

Cuddington Neighbourhood Plan – Regulation 16 Consultation

Non online responses

Historic England

(note text extracted from email)

To whom it may concern:

Thank you for consulting Historic England on the submission version of the Cuddington Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment including advising on the conservation of heritage assets and champion good design in historic places. As such, our review of the plan is limited to those areas that fall within our remit and silence on other matters should not be treated as agreement or consent.

I am happy to confirm that, having reviewed the plan, we do not have any objections to submit to the examiner. We are pleased to commend the plan to the examiner in several places, notably the basis of design policies for the conservation area and other characters areas on a robust character assessment including the identification of a list of non-designated heritage assets of local interest and the identification of the witchert walls as a locally distinctive feature of the Parish. We do feel the policy relating to non-designated heritage assets CDN.03 would benefit from brining the list of addresses affected by the policy into the policy (it is not an extensive list) or at least into the supporting text. Policy CDN.03 may require modification to ensure it complies with the weight given to non-designated heritage assets set out in paragraph 203 of the NPPF, we feel the inclusion of a policy that protects the non-designated heritage assets of the parish, as identified by the community in the plan making process, is an important element of the plan that we would hope to see retained. The Planning practice Guidance was updated in July 2018 to clarify that neighbourhood planning is an appropriate means of identifying features of the historic environment that should be included in a local list (see NPPG Historic Environment, Paragraph: 040 Reference ID: 18a-040-20190723).

We hope these brief comments are of help to the examiner but would be pleased to answer any queries relating to them.

Yours faithfully

Robert Lloyd-Sweet

Robert Lloyd-Sweet | Historic Places Adviser | South East England | Historic England
Cannon Bridge House|25 Dowgate Hill|London|EC4R 2YA

Steve Adkins

(note text extracted from email response)

The reference to the old ADVLP saved policies which have been superseded in September 2021, by VALP should be removed. I think the plan focuses too much on housing and should broaden out to cover some of the points below.

I would like to see more about developing a safe cycling path route from Cuddington to join with Haddenham Cycle path network.

I think that there should be more on the transport of buses, as the 110 bus services have been cut dramatically due to the pandemic and this needs to be protected. We should also look at teaming up with other villages to provide a community bus.

I would also like to see more about the protection of village amenities such as the pub, playing fields, Bernard hall, social club, hairdressers, post office and shop. This should say something like it would not be welcome to change any of these into housing or other non-economic uses. Currently this is not stated and could cause problems later if someone wants to convert one of these to housing.

Regards,

Steve Adkins

Date: 06 January 2022
Our ref: 374920
Your ref: Cuddington Neighbourhood Plan – REG 16



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T 0300 060 3900

Dear Sir or Madam

Cuddington Neighbourhood Plan – REG 16

Thank you for your consultation request on the above dated and received by Natural England on 18th November 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..

Natural England does not have any specific comments on this draft neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England



Sent by email to:
neighbourhoodplanning@buckinghamshire.gov.uk



thameswaterplanningpolicy@thameswater.co.uk



22nd December 2021

Buckinghamshire: Cuddington Neighbourhood Plan 2017-2033 Regulation 15 Submission

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you may be aware, Thames Water are the water and sewerage undertaker for Buckinghamshire and hence are a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Development Sites

The information contained within the Neighbourhood Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.

There are no development sites in the draft plan to comment upon.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service (link below)

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Infrastructure Policies – Comments on Water and Wastewater/Sewerage Infrastructure

Thames Water consider that there should be a separate policy covering water and wastewater/sewerage infrastructure in the Neighbourhood Plan.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "*Strategic policies should set out an overall*

strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."

Paragraph 11 states: *"Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: *"Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."*

Paragraph 26 of the revised NPPF goes on to state: *"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."*

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *"Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.***"

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the number above if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

Buckinghamshire Council Response to Cuddington Neighbourhood Plan Regulation 16 Consultation

Neighbourhood plan document sections where comments have been made

Foreword

1. Introduction & Background

Para 1.8 The VALP was adopted in Sept 2021 so can comment for the Examiner this can be updated - there shouldn't be any references to VALP Modifications etc. in the final neighbourhood plan. The AVDLP 2004 saved policies are no longer in use so it's an awkward situation of the neighbourhood plan being submitted to us when they were still in force but now at the Regulation 16 stage they are no longer in force having been replaced by the adopted VALP.

2.The Neighbourhood Area

Countryside

There is very little understanding and mention of biodiversity within the neighbourhood plan. It is recommended that a biodiversity enhancement policy or biodiversity net gain is to be incorporated within the plan for the following reasons:

It is welcomed to see in section 2.16 noting that the Parish is part of a Thames Valley Extension Biodiversity Opportunity Area and the highly abundant priority habitats; ponds, lowland meadows, hedgerows, arable fields. It is recommended to incorporate a policy to enhance and conserve this BOA particularly the watercourses and floodplains. It is important to acknowledge that Local Plan Policy 'NE2 River and stream corridors' of the Aylesbury Local Plan 2013-2033 states that: "Development proposals must not have an adverse impact on the functions and setting of any watercourse and its associated corridor. They should conserve and enhance the biodiversity, landscape and consider the recreational value of the watercourse and its corridor through good design. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting. Development proposals adjacent to or containing a watercourse shall provide or retain a 10m ecological buffer (unless existing physical constraints prevent) from the top of the river watercourse bank and the development and include a long-term landscape and ecological management plan for this buffer".

There is however no mention of statutory and non-statutory sites within the Parish, nor the diversity notable and protected species found within. It is important to mention these areas especially when referring back to potential development within the area.

There are many records of bats, farmland birds and badgers within Cuddington.

Permission for planning can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet the requirements of the National Planning Policy Framework (2019), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017. The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications' states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.

With regards to protected habitats and priority habitats the Local Plan Policy 'NE1 Biodiversity and Geodiversity' of the emerging Vale of Aylesbury Local Plan 2013-2033 states: "Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance including habitats of principal importance or the habitats of species of principal importance will not be permitted except in exceptional circumstances where the need for, and benefits of the development significantly and demonstrably outweigh the harm it would cause to the site, and the loss can be mitigated and compensation provided to achieve a net gain in biodiversity/geodiversity."

Therefore, it is recommended that Buckinghamshire and Milton Keynes Environmental Record Centre should be contacted to gain this data.

Summary

3.Planning Policy Context

National Planning Policy (NPPF)

Para 3.2 There was a further revision to the NPPF (July 2021) so this section and para 5.25 should be updated with the latest references in the NPPF

The Vale of Aylesbury District Local Plan (AVDLP) saved policies

Para 3.4 The Saved policies from the 2004 Adopted Aylesbury Vale District Local Plan have all been superseded (in September 2021 by adoption of the Vale of Aylesbury Local Plan) now and are no longer in use. However, at the point the Regulation 15 neighbourhood plan was prepared, in June 2021 the saved policies were still in force. Therefore, it is a query to the examiner if the AVDLP 2004 policies should be removed and just assess conformity against the Vale of Aylesbury Local Plan as that is the position at the time of this Regulation 16 stage.

The Vale of Aylesbury Local Plan (VALP) (as modified)

Para 3.5 A further query to the examiner if this section should be updated with reference to the adopted VALP (rather than modifications) as the plan was adopted in September 2021 and the Regulation 16 consultation commenced 18 November 2021.

Para 3.8 Table 2 in the Adopted VALP still shows an allocation of 15 homes on site CDN003 but that the total housing development needed was 28 homes and so 13 committed/completed already since 2013.

Recent Planning Issues

4.Vision and Objectives

5.Policies

- Figure 8 – in some cases, the important local views (shown with dark and light blue dots) appear to be located within private land eg. farmers’ fields. The viewpoints for the important local views need to be in publically accessible locations, rather than in private land.
- Figure 8-it would be helpful if arrows could be included to show the direction of the important view
- Could public footpaths also be added to Figure 8?
- Figure 8- other buildings of note – it is not clear what these buildings of note are -the map should also point out listed buildings (and their grading eg. Grade I, Grade II, Grade II*). These buildings and the local note buildings should be identified using shading as opposed to a dot on top because it’s difficult to understand which building this is referring to.

Housing

Settlement Boundary

Para 5.11 The wording as shown at the Further Modifications Stage was accepted by the VALP examiner therefore is that in the Adopted VALP September 2021 Policy D3 at page 158.

Policy CDN 01 Settlement Boundary

- Within 01 policy wording- sentence 2 could be combined with the last sentence? The wording of the last sentence could also be amended to read “new isolated homes outside of the settlement boundary will not be supported” this would aid understanding of the policy and link back to the settlement boundary designation.
- “Housing proposals should meet CNP objectives for small/ medium scale development” should be replaced with “Development proposals should meet CNP objectives for small/ medium scale development” because the current wording does not include proposals such as commercial.

It is suggested to the examiner it would improve the policy to achieve sustainable development to make it positively worded so say what grounds development would be supported within or outside the settlement boundary. Also the policy should include criteria rather than saying the CNP objectives for small/medium scale development should be met (those aren’t in the policy).

Affordable Housing

As VALP has now been adopted the policies therein will apply and AVDLP presumably no longer needs to be referenced? VALP policies H1, H2, H6a & H6c.

VALP Policy H1 states a minimum of 25% affordable housing. Might the NHP want to seek more than this as others are?

Para 5.16 The VALP Policy H1 says 'at least 25% affordable housing' and the Council believes the words 'at least' to be very important compared to saying it will be 25%. Can 'at least' be added for accuracy.

What about other elements of the NPPF that have been introduced after the drafting of VALP which was based on the 2012 version? Do they want or need to consider for example First Homes or Para 65 10% affordable home ownership?

If First Homes, then would they want to apply a local connection to these as per First Homes Guidance?

Ideally if they include First Homes then we would welcome an approach that would maintain the same number of affordable rent and shared ownership that we would have expected from a min 25% with a 80% rent, 20% intermediate (preferred shared ownership) split. For example, 35% with 25% First Homes, 60% rent, 15% shared ownership as per Winslow's current proposals.

Important Local Views CDN 02

- Replace "must not obscure nor detract" with "should not obscure nor detract"
- Could some of the points within 04 and 05 that refer to important local views be moved into this policy which would help to cut down the length of policies 04 and 05?

Local Heritage Assets CDN 03

- The policy title and wording only refers to buildings of 'local heritage assets'-. 'Local' should be removed because this only implies that assessment will be carried out on the NDHAs rather than the designated heritage assets.
- This policy is worded too heavily/not worded too well, with no reference being made to the 'significance' of heritage assets or levels of harm. Policy CDN 03: "New development proposals must not lead to the loss or damage of Local Heritage Assets".
- This should be replaced with "should not lead to loss or harm"
- The wording of policy BE1 is a bit lighter for NDHAs – "Proposals which affect the significance of a non-designated heritage asset should be properly considered, weighing the direct and indirect impacts upon the asset and its setting".
- The supporting text for BE1 in VALP also says "Where applications affect the significance of these assets [non-designated buildings and structures], the likely harm that will be caused is weighed in the planning balance, and weight is placed on the conservation of these assets. Where it is not practicable to retain a building which is considered to be a non-designated heritage asset, the council will expect to see a full appraisal of the significance of the building and the reasons why it is not practicably repairable or reusable submitted as part of the planning application. In addition, the council may require a full record of the building to be made prior to demolition."
- The wording in VALP is not reflected in the wording for policy CDN 03

Policies CDN04 and CDN05 general points

- Both policy 04 and 05 are lengthy with 18 and 17 points respectively
- Could some of the points be combined to reduce the number of criteria? Eg. in policy 05 could points 3 and 4 be combined? Points 2 and 5 be combined? Points 6 and 12 are also fairly similar.
- Point 18 of CDN 04 and point 17 of CDN 05 – construction management plan is this referring to every development within the settlement boundary, including householder applications? If so, the level of details required appear excessive, especially because noise/ disturbance from building operations is not a material planning consideration. In many cases (for all householder applications that I deal with), hours of working is also not a consideration. In many cases, the LPA cannot reasonably request this information. Could the wording be updated to say "where deemed appropriate by Development Management highways, the proposal may need to be accompanied by a construction management plan...."

Point 13.

Design of New Development in the Conservation Area CDN 04

- Please note that some of these points are also applicable to the criteria of CDN 05 but have only been referred to here.
- Point 4- sentence “and allow views of the countryside from adjacent properties” should be removed as a right to a view is not a material planning consideration
- Point 5- should be updated to read “Building heights should generally follow the existing pattern of gently pitched roofing. Thatched roofs should have steeper pitches with low eaves lines and a lower ridge line.”
- Point 9- remove where possible from the sentence that continues to read “off street parking should be provided in order to avoid increase pressure....”. This is because our parking standards are off-street parking, we cannot condition or secure on street parking as part of a parking plan so it’s not in compliance with VALP
- Point 11- should remove “with the possible exception of Upper Church Street” from the sentence. As officers we will make the assessment whether a deviation from the policy is appropriate.
- Point 12- For small scale applications, this is something we don’t need to consider. Perhaps the policy criteria could read “light spill from any external lighting should be mitigated”

Point 12.

In relation to the external lightening the Local Plan Policy ‘NE8 Trees, hedgerows and woodlands’ of the Aylesbury Local Plan 2013-2033 states that: “Developers should aspire to retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25 m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting.” Bats may be impacted by artificial lighting as a result of the proposed development. Artificial lighting design needs to be designed in accordance with the ‘Guidance Note 08/18: Bats and artificial lighting in the UK’ (Institute of Lighting Professionals, 2018).

- Point 13- What does it mean by “corridors and pockets of green”? “protect important green spaces” may be more appropriate

Should incorporate ‘Wildlife’ when discussing corridors.

It should also be noted that the point should include the words ‘road verges’ to provide that connecting habitat throughout Cuddington.

It is welcomed to see they would like to keep the grass verges however to enhance native biodiversity only locally native sourced plants should be planted. Similar to restoring orchards within the Parish. This also should be integrated within Policy CDN 05: Design of New Development Outside the Conservation Area point 12 (page 30).

Many ornamental non-native species can have a negative effect to orchards and grass verges for example they can potentially introduce diseases, spread rapidly reducing biodiversity, compete with native species for resources, which can result in the decline of so many native species (Road_verge_guide_2021_WEB.pdf (plantlife.org.uk). There are also many ornamental plants which are listed within Schedule 9 Wildlife and Countryside Act 1981 (as amended), where it is illegal to plant or otherwise cause to grow in the wild.

Non-native species can also be more expensive to buy and manage. Please take a look at the below link which provides appropriate management techniques in creating biodiversity rich and wildlife friendly grassland road verges:

- [Managing_grassland_road_verges_Singles.pdf \(plantlife.org.uk\)](#)
- [Wilder-Road-Verges-Toolkit \(2\).pdf](#)

Road verges are mentioned as one of the actions within the new Biodiversity Action Plan (BAP) (MKNEP, 2021) to increase across Buckinghamshire and Milton Keynes also to enhance the habitats through management (Forward to 2030 – Buckinghamshire & Milton Keynes Natural Environment Partnership (bucksmknep.co.uk). The Neighbourhood Plan should be in accordance with the new BAP document.

It is recommended throughout the neighbourhood plan when referring to the plantation of flowers, trees, scrub or hedgerows it should be stated to be of 'local provenance' which entails the native species to be sourced locally and planted in appropriate areas.

The Neighbourhood plan should not completely rely on the NPPF and VALP to protect the locally rich biodiversity as they are not specific to Cuddington. Within the NPPF a great weight should be given to protecting and enhancing the natural landscape and biodiversity. A biodiversity policy is required.

It should be noted that with regards to the Local Plan Policy 'NE2 Biodiversity and Geodiversity' of the emerging Vale of Aylesbury Local Plan (VALP) 2013-2033 states that: "c. A net gain in biodiversity on minor and major developments will be sought by protecting, managing, enhancing and extending existing biodiversity resources, and by creating new biodiversity resources. These gains must be measurable using best practice in biodiversity and green infrastructure accounting and in accordance with any methodology (including a biometric calculator) to be set out in a future Supplementary Planning Document". Also in paragraph 118a of the National Planning Policy Framework (NPPF) states: "Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside". Furthermore, paragraph 170d of the NPPF requires that: "Planning policies and decisions should contribute to and enhance the natural

and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure". Currently there is no policy or information provided within the proposed neighbourhood plan, it is recommended to be incorporated following the legislations, guidance and policies as there is a mandatory requirement to demonstrate long-term and measurable biodiversity net gain as part of any development application. These enhancements which can be incorporated within the neighbourhood plan should reflect to data produced by BMERC.

With the Environmental Act 2021 in place alongside the NPPF and VALP it should be noted within the Neighbourhood plan that biodiversity net gains are required through new development, specifically 10%.

- Point 17- not a planning issue, wouldn't consider as part of planning application

Design of New Development outside the Conservation Area CDN 05

- Point 9- Creation of driveways and dropped kerbs can often be done under PD and therefore this wording would be contrary to our policies.

Point 11. In relation to the external lightening the Local Plan Policy 'NE8 Trees, hedgerows and woodlands' of the Aylesbury Local Plan 2013-2033 states that: "Developers should aspire to retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25 m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting." Bats may be impacted by artificial lighting as a result of the proposed development. Artificial lighting design needs to be designed in accordance with the 'Guidance Note 08/18: Bats and artificial lighting in the UK' (Institute of Lighting Professionals, 2018).

- Point 15- this policy should be less specific, remove the part that reads "as a result of scale, siting, massing, impact or overlooking"

All policies

- Wording throughout is too inflexible, eg. lots of "must not". This needs to be revised to allow some flexibility.

- Should there also be some reference to electric charging points? All new and existing buildings should incorporate integrated biodiversity features.

Biodiversity enhancement features are required in line with the VALP for new development. The Aylesbury Vale Green Infrastructure Strategy states that development in suitable areas should provide bat or bird roosting provision within the fabric of the buildings. In this instance by understanding the local biodiversity enhancements can be put in place to provide species specific habitats. For example, there are many bat records within the Parish therefore it is recommended within each new dwelling a bat box should be integrated into the design. Or there are very little records of hedgehog therefore it is recommended to incorporate hedgehog holes within any new boundary walls and fences.

There is mention of orchard pockets within the Parish. It is recommended to incorporate a policy to include enhancing and restoring the orchards.

Buckinghamshire has a number of fruit tree varieties of historical and local significance. The proposed fruit trees are recommended to be traditional and local fruit varieties to Buckinghamshire to maintain species richness, for example:

- Dessert Apples (Ball's Pippin, Cox's Orange Pippin, Feltham Beauty, Langley Pippin)
- Cooking Apples (Arthur Turner, Small's Admirable)
- Dual Purpose Apples (Cox's Pomona)
- Damsons (The Aylesbury Prune)
- Plums (Allgrove's Superb, Bullace Langley and Stewkley Red)
- Cherries (Prestwood Black).

6. Implementation

Development Management

Monitoring & Review of both the Policies and the Plan

Infrastructure Projects

Appendices

Appendix A: Cuddington Neighbourhood Plan: General Evidence base

Appendix B: Cuddington Neighbourhood Plan: Landscape Report

Appendix C: Cuddington Neighbourhood Plan: Important Local Views

The two plans on page 6 and 13 showing the important views in and out would sit better replicated at the back of the neighbourhood plan itself as they provide what is needed to clearly understand the direction of view to assess Policy CDN02

Appendix D: Cuddington Neighbourhood Plan: Built Environment

Appendix E: Cuddington Neighbourhood Plan: Social Infrastructure

Appendix F: Cuddington Neighbourhood Plan: Traffic

Other supporting documents

Cuddington Neighbourhood Plan: Consultation Statement

Cuddington Neighbourhood Plan: Basic Conditions Statement

Cuddington Neighbourhood Plan – online responses

Organisation - Not Answered

Name - Elizabeth Greenwood-Hughes

Address -

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Request to be notified of future progress of the neighbourhood plan - Yes

Email address -

[REDACTED]

Support or object to neighbourhood Plan - I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

Comments suggested changes and reasons - I support the plan and agree with everything the PC have suggested.

My only comment is that the proposed travel and transport plans don't seem to include those of us who live on the edge of the village. Currently villagers who live on the roads from both Chearsley and Dinton cannot walk, cycle or ride safely into the village to access amenities. The roads are either 50 or national speed limit with busy traffic and extremely dangerous bends. It is therefore only fair that our needs are also included in any future travel infrastructure. It would also be beneficial if the proposed cycleways could allow horse riders.

Ref - ANON-35YE-RN22-A

Cuddington Neighbourhood Plan – online responses

Organisation - Not Answered

Name - Gillian Fisher

Address -

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Request to be notified of future progress of the neighbourhood plan - Yes

Email address -

[REDACTED]

Support or object to neighbourhood Plan - I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes

Comments suggested changes and reasons - On the Dadbrook Farm site, the plan is to build 'at least' 15 houses.

Given the size of the site this should state a maximum of 15 houses, preferably 12.

Ref. Appendix B landscape report it states that Cuddington is quiet and tranquil with a lack of intrusion from large development.

The building of 'at least' 15 houses would constitute an intrusion given that a minimum of 30 extra vehicles, and probably nearer to 40 would be entering the 'quiet and tranquil' village.

Ref. Appendix D Built environment. Point 10. reference is made to numbers 1 and 2 Dadbrook Farm cottages and a stone and timber barn with a striking timber frame which is a 'significant trace of local rural architecture that is also aesthetically valuable to the community with stone and witchert walls which are a distinctive historic feature of the village'

An access road into a development of 'at least' 15 houses would detract significantly from the aesthetic value of the above properties. Ref. Cuddington neighbourhood plan Regulation 15 submission 1.6 Does the plan protect Listed Buildings?

Ref. Appendix E Social infrastructure. reference is made to Cuddington and Dinton Church of England Primary School and the fact that as the population grows , there is a possibility that the school will outgrow its current site. Given that there is no space for the school to

physically extend there would then be implications for sustainability in that residents would have to transport their children to schools in other towns and villages.

Also under Appendix E reference is made to the fact there is no means of reaching amenities in Haddenham by public transport and the infrequency of buses to Thame and Aylesbury increases the number of private car journeys.

If plans go ahead to build at least 15 houses there will probably another 30-40 vehicles from Cuddington making those private car journeys. Again implications for sustainability.

The Consultation document states that the Parish Council proposes improved pedestrian and cycle access along Dadbrook between Cuddington and the A418 where there is access to the 280 bus service between Thame and Aylesbury. However how realistic is this when under the Regulation 15 submission Public Transport 2.11 it states 'the 280 bus stops are only accessible via Dadbrook, a walk of about half a mile from the village centre, the majority of which is on a derestricted road with no footway. This route has poor sightlines due to the winding and undulating nature of the road and is unsafe for pedestrians especially at night. The Parish Council has asked Bucks Highways to provide a safe pedestrian route along Dadbrook to encourage greater use of the 280 but have been advised that there are technical difficulties in providing safe refuge for pedestrians because of drainage issues as well as the considerable cost.' Realistically, residents will not be walking to the A418 to use the 280 bus. Instead they will use their own vehicles and with the proposed extra housing there will be 30-40 extra vehicles making these journeys.

Ref. NPPF 3.9 It states that 'there are concerns about the potential for coalescence (visual and or physical) as Haddenham expands northwards towards Cuddington. Ref. 3.10 'the CNP seeks to identify and protect the unique qualities of the village.

The unique qualities of the village will be impacted detrimentally if at least 15 houses are built at Dadbrook Farm and as the site is to the south of the village there is certainly potential for coalescence with Haddenham as it extends northwards.

Ref. NPPF 3.11 it states' The proposed allocation of housing at Dadbrook Farm in VALP as modified offers the opportunity to offset traffic impacts of development by improving access to public transport. It would meet the village aspiration to provide safe pedestrian and cycle linkages within the village and to the wider network on land controlled by the site owner.' How realistic is this given the technical, drainage and cost issues referred to above, regarding pedestrian access to Dadbrook and the A418 which is presumably 'the wider network'.

Ref. CDN 05 Design of new Development outside the conservation area.

Point 2. Proposals shall take account of the context of the site in relation to landscape, character, local distinctiveness and building types and densities. 3. Developments should preserve existing public views from the village into the surrounding countryside and retain the graduated edges of the existing settlement. 4. The layout and elevations should provide sufficient gaps between buildings to protect views of the countryside from public viewpoints and allow views of the countryside from adjacent properties.

The proposed site at Dadbrook Farm is elevated in relation to existing surrounding properties, therefore in order to preserve existing views of the countryside from adjacent properties and public viewpoints the site would need to be excavated to ensure lower roof lines. To ensure sufficient gaps between buildings to protect views of the countryside, fewer than 15 houses should be built.

Ref. point 15 Proposals for new developments or for alterations to existing buildings should not be detrimental to the amenities of neighbours as a result of scale, siting, massing, impact or overlooking.

15 or more new houses on the Dadbrook Farm site would contravene this policy statement for residents on Dadbrook and Bernard Close.

Consideration should also be given to access to the proposed site from Dadbrook at a point in the lane which is particularly narrow, undulating and with poor sightlines when a possible 40 vehicles could be using this access.

In order to retain the tranquil quality of the village of Cuddington any development should be kept to a minimum and I feel that at least 15 houses is excessive and unviable. A maximum of 12 houses could ensure that the properties have adequate parking and relatively large gardens and green spaces in keeping with the existing properties on Dadbrook and Bernard Close.

Ref - ANON-35YE-RN2H-Z

Cuddington Neighbourhood Plan – online responses

Organisation - Not Answered

Name - Dr Michael Straiton [REDACTED]

Address - [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Request to be notified of future progress of the neighbourhood plan - Yes

Email address - [REDACTED]

Support or object to neighbourhood Plan - I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons

Comments suggested changes and reasons - When the Plan for Cuddington Bucks. was first formulated in 2018 the idea of developing Dadbrook Farm was rejected. Since then this has been reversed and a large colony had been suggested.

I feel that this would be a retrograde step for the Village for several main reasons :

- 1 a large number of houses would most likely be built on the Dadbrook Farm site.
- 2 Dadbrook Lane is difficult for traffic : from the Village the narrow Lane winds down - hill when it reaches the lowest point that usually floods after heavy rain then winds uphill again to join the Aylesbury Road. There used to be regular motor crashes at this point but has been re-configured to make it safer.
- 3 Each new house would have at least two cars that would add to the danger
- 4 This country needs as much farmland as it can retain with hazards to shipping and increasing population.
- 5 Climate change demands reduction in traffic air pollution.

Ref - ANON-35YE-RN2N-6