

Haddenham Parish Council Submission

Local Plan Site Selection Consultation

16 March 2026

Please find below comments from Haddenham Parish Council following a review of the documents published online by Buckinghamshire Council on 17 February 2026. Our response is submitted in this format as the online survey does not allow for an appropriate response to the scale of development proposed for Haddenham.

Haddenham Parish Council has undertaken some initial work towards the preparation of a new neighbourhood plan. This preparatory work has been referenced below and indicates a quite different assessment of the suitability of Haddenham to be identified for such significant growth. The limited engagement with parish councils is evident in the published documents in which we have found errors and inconsistencies with our own assessments and those previously published for the Local Plan.

The limited time allowed to review these documents raises concerns about the rigor with which the parish council can assess their content, however it is very clear from the assessment we have been able to carry out that if the Local Plan progresses on the basis of these documents unamended it will devastate the existing village and create a dormitory commuter town. The impact on the surrounding area will be profound.

A new neighbourhood plan cannot allocate strategic growth on this scale so it is vital that the parish council is involved in any further master planning or spatial development strategy. This could be progressed in part through a neighbourhood plan, but would require willingness from Buckinghamshire Council to work with the parish and to date there has been little evidence of this .

Sustainability Appraisal (AECOM Feb 2026)

AECOM's Feb 26 Sustainability Appraisal (hereafter SA 2026) for the Local Plan makes no reference to AECOM's March 2025 Strategic Environmental Assessment Scoping Study (SEA 2025) for Haddenham PC's Neighbourhood Plan Review. Both documents use broadly similar formats of environmental themes. Surprisingly, key issues identified for the PC's Scoping Study are not used to inform the 2026 appraisal. This should be corrected. Other available information has also been ignored. Some examples follow:

- SA 2026 makes much of Haddenham's accessibility to Aylesbury for common infrastructure. But the PC has repeatedly pointed out that Haddenham's principal service centre is Thame, in Oxfordshire, which is nearer.
- SA 2026 dismisses biodiversity as having low constraint. SEA 2025 refers to various designations, constraints and opportunities.

- SA 2026 finds no flood risk. SEA 2025 says “surface water flood risk is changing and becoming a serious issue”.
- SA 2026 says “there are few traffic concerns”, ignoring evident problems of congestion, parking generally, and commuter parking in residential streets near the station. On the latter issue, BC Highways have conditioned a S106 contribution from the HAD007 site to find a way forward. BC’s 2025 Conservation Area review highlights the impact of traffic increase and HGV incursion on heritage assets. BC part-funded the Parish Council’s “Streetscape” project commissioned to address traffic impact problems identified in the Neighbourhood Plan, evident even before the completion of recent new development.
- SA 2026 says on water there is capacity for growth in local plan period. This is contradicted elsewhere (see below).
- The published “Interactive Map” shows land south of Aston Road as “part suitable” for development. This conflicts with BC’s NESS “Methodology Note” which rules out progressing land to the south because of flooding constraints. Note that BC’s own response to the PC’s SEA 2025 also ruled out land to the south for heritage reasons. We think this should include the south east site.

New & Expanded Settlement Study Part 3 Site Assessment (AECOM Feb 2026)

Location Summary - Location & General Area Summary

1. We appreciate the reference to “three sites” is a summary, but this sets a misleading tone of uniformity across the whole appraisal, masking that there are several distinct locations with different challenges. An alternative geographic grouping of sites is suggested at the end of our response.

Location Summary - NESS Typology

2. *Major urban expansion with range of services required – dependent on associated settlement (higher order services and transport connections)*
The associated settlement is assumed to be Aylesbury, but Haddenham’s principal dependency for higher order services is Thames, which is nearer and of course in Oxfordshire. In particular the two settlements are bound by their shared railway station, located in Haddenham. The station’s “Parkway” designation also implies wider use by other settlements (indeed it is mentioned by estate agents’ adverts for miles around, and is signed from the M40). To a lesser extent Haddenham also looks to Princes Risborough, and many residents look to Oxford for employment. But it’s the relationship with Thames which is significant.

Location Summary - Assumed Site Capacity

3. Is a density of 50dph really appropriate in such an historic village (see Buckinghamshire Historic Towns Project 2008, Conservation Area reviews 2008 and 2025) with such a wealth of heritage assets?

Place - Strategic Planning Considerations

4. The PC considers that the highest area of attractive landscape is not the AAL northwards referred to by VALP but the south west site (south of Thame Rd and west of Station Rd) with its views east and south towards Chilterns ridge. We consider that heritage considerations should be regarded as strategic matters. Yet we score 'low/medium' for 'Preserve the rural and urban character'. How does the scoring system work? These plans would obliterate the existing character of the village.
5. In our view distance BC should adopt the 20-minute walking distance as a key consideration. The real problem in Haddenham is that the station was sited on the western edge of the settlement, primarily as a Parkway station serving Thame and other communities. Moving eastwards, essentially east of Stanbridge Rd, increasingly cannot meet the 20-minute criterion.

Place - Settlement Hierarchy

6. Haddenham is classified as Tier 3 – small market town/ other large settlement. In the May 2025 settlement study Haddenham's distance to the nearest Tier 1 or 2 settlement is identified as Aylesbury. For many residents Haddenham's principal service centre is not Aylesbury (6 miles away) but Thame (4 miles), similarly Princes Risborough (6 miles). Thame would probably be an equivalent tier 2 settlement. Again, how is the impact on settlements with a closer relationship than Aylesbury being assessed?

Place - Historic Environment

7. See paras 3 & 4 above. The text refers to "a number of listed buildings" - in fact there are 120. Note that Snakemoor in the north west site (north of the Thame Rd west of the railway) is not referenced but is a designated Local Nature Reserve. There is a second significant reserve at Pond Close (known locally as "Ponnie") at Manor Farm, Church End, immediately south of the railway and in the Conservation Area which really should have a protection designation with a large fishing lake, breeding swans, various duck and bird species, and herons.

Place - Landscape and Settlement Character

8. The Parish Council **strongly opposes** inclusion for development of the sites to the south west (ie west of Station Road) and, if pursued, to the south (Aston Road). The NESS assessment clearly has some reservations about the site west of Station Road, but probably not from a detailed local knowledge perspective. This site adjoins, and is accessed directly on foot from, the oldest part of the conservation area at Church End with its heritage of listed buildings (including one Grade 1 and

three Grade 2*). It adjoins the reserve at Pond Close (known locally as “Ponnie”) at Manor Farm immediately south of the railway and in the Conservation Area, and really should have a protection designation with a large fishing lake, breeding swans, various duck and bird species, and herons. This would be under pressure from any development nearby, and public access may be withdrawn. The site has popular public footpaths and permissive paths. It affords excellent and special long-distance views along many miles of the Chiltern Hills escarpment both to the east and running southwards; conversely this land if developed will be visible from that ridge. The site has long been a breeding ground for ground-nesting skylarks. Skylarks are in decline with the RSPB reporting a 68% reduction since 1967, the decline being largely due to changes in farming and grassland management. Skylarks are RSPB red listed as endangered and are a protected species. This land has been carefully managed in recent years by the landowner with Government grants to support Regenerative Farming and encourage biodiversity.

9. §192 of the draft NPPF requires plans to protect habitats and support the recovery of protected species in compliance with the Wildlife and Countryside Act 1981 and the Habitats Regulations. At N1 (page 87) the draft NPPF refers to steering “*the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in the Framework*” (which also links to policy N2, that follows).

10. The site should be assessed from a landscape appraisal and historic environment perspective, applying the Landscape Institute's (LI) Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd edition and the LI's technical notes on landscapes outside of national designations. We would also draw attention to GLVIA's Box 5.1 '*range of factors that can help in the identification of valued landscapes*' which refers to landscape quality, scenic quality, rarity, representativeness, conservation interest, recreational value, perceptual aspects and associations. The Parish Council also points to the Florence convention (the European Landscape convention - which the UK Government is still a signatory to, since ratification in 2007), which deals with a '*sense of place*', '*the setting for day-to-day lives*' and '*a shared resource which is important in its own right as a public good*'. The landscape to the south west (and south) exhibits high levels of '*perceptual landscapes*' (elements of wildness and tranquillity). These baseline assessments are supported by the Buckinghamshire Landscape Character Assessment (by LUC in 2011), with land to the west and south mostly within LCA 8.9 Haddenham Vale (within Landscape Character Type 8 - Vale). Whilst this LCA will need updating, in light of Haddenham's expansion since 2011, the '*sensitivity*' of Haddenham's landscape in these areas is medium to high when taking forward the GLVIAs methodology - also see Figure 5.1 of that document. Notwithstanding the mooted amendment to the 2025 draft NPPF to delete '*valued landscapes*', the Local Planning Authority (LPA) must still consider the significant effects of development in its assessment of environmental impacts. By applying the

GLVIA methodology, this is more than an '*ordinary, everyday landscape*' (see GLVIA page 85). Both the land west of Station Road and, if pursued, the land off Aston Road perform highly on landscape quality and scenic quality, perceptual aspects, recreational value and conservation interest.

11. This important habitat must not be lost to development and will be resisted.

Environment - Environmental Designations

12. Reference is made to Snakemoor Nature reserve and ancient woodland to the west. These protected habitats must remain protected, if surrounded by development they will become much more intensively used by visitors. **Any development must respect the Local Nature Reserve allowing for it to be extended and enhanced, ensuring it is linked through green corridors to other green spaces, and not isolated.**

Environment – Relevant Water Bodies (see also Infrastructure section below)

13. The designated “main river” that runs through north-south through the centre of Haddenham (known as the Haddenham stream) is not mentioned. Recent development has been approved that allows controlled discharge of surface water into this river. The calculations for this discharge are made on the assumption that the river is running freely, however it is not. In the last two years there have been two major flooding incidents of properties in the historic areas of the village that have boundaries with the main river, both times causing damage to buildings and belongings. The Parish Council has identified over 100 properties in the village with riparian responsibilities for maintenance of this river. Many of the home owners are unaware of their responsibility to maintain the river, or struggle to do so. The Parish Council is working with residents and Bucks Highways to reduce the flooding risk and is funding an initial assessment of the cost for a full survey. Redrow in particular experienced substantial problems at the HAD007 site (west of Churchway) with surface water problems, compounded by old street drains unable to cope. The PC has requested a S19 (Flood Act) review.
14. A second north-south stream runs to the east of Haddenham and is shown on the government’s flood map as Folly Farm ditch. **The PC strongly asks that any future development leaves this watercourse as a green/blue corridor for recreation and biodiversity and that it not be built over or incorporated within individual property boundaries creating riparian responsibilities.**
15. **Any future development plan for Haddenham must include a surface water drainage scheme for the whole village, taking into account the historic drainage system, not a piecemeal assessment for individual planning applications.**

Infrastructure - Oil

16. There is a GPPS pipeline that may impact the developable area to the east and requires a protected corridor.

Infrastructure – Water & Waste Water, Flood Risk and Surface Water Drainage

17. AECOM's Scoping Report for the PC (SEA 2025) says “surface water flood risk is changing and becoming a serious issue” – see above.
18. Thames Water's Haddenham Sewage Treatment Works has been given a green ‘capacity for growth’ rating. This is contradicted by the Planning for Infrastructure (p15) of the Draft Plan Spatial Strategy which states ‘*There are 73 wastewater treatment works within or serving Buckinghamshire, 41 of which are likely to be close to (including Haddenham), or to have exceeded their flow permit by the end of the Local Plan period (2045)*’.
19. Recent development in Haddenham has demonstrated that both the foul water network and water supply network are at capacity and not coping. Residents of the new development on land at Stanbridge Road (Rectory Homes) and by the station (Persimmon) have suffered sewage flooding their streets and homes in heavy rainfall. The Cala homes development on the airfield is being served by tankers to empty sewage. Residents on the Airfield site have suffered such low water pressure that heat pumps are difficult to install in their properties and the water supply has on occasion completely stopped at the extreme reaches of the development.
20. Thames Water itself has responded to two current large speculative planning applications on sites within the site assessment area as follows.

25/02417/AOP 700 homes on Haddenham airfield: Thames Water has identified that the existing FOUL WATER network does not have sufficient capacity to support the proposed development; Thames Water has identified that the existing SURFACE WATER network does not have sufficient capacity to support the proposed development; Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.

25/02006/AOP - Outline planning application for mixed use development comprising up to 192 residential units on land At Station Road Haddenham Bucks HP17 8DD: Thames Water has identified that the existing FOUL WATER network does not have sufficient capacity to support the proposed development; Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.

21. With Thames Water being the responsible body to deliver upgraded infrastructure but is a failing institution, there seems little optimism that any number of new homes connected to the water system will be deliverable within a sensible timeframe. The national growth agenda will replicate this scenario across the Thames Valley. If Buckinghamshire Council is to deliver the number of new homes in its local plan it will need to lobby Government to step in and resolve the water related infrastructure issues.
22. There is also the challenge of how any new infrastructure to the west of the railway can be connected to the existing foul water system and on to the treatment works as it would need to cross the railway line in a cutting.
23. On mitigation, the statement that *'Large residential developments and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage in order to reduce water demand'* is considered by the Parish Council to be of insufficient strength to make this vital consideration for the future of water management enforceable. This must be incorporated as a clear requirement in the local plan policies.
24. There are large areas of flood plain to the west and south of the village which will limit future expansion. These flood plains extend to the boundaries of other nearby settlements so the impact of development within Haddenham should take into account the potential flooding impacts of the wider area.
25. **Again, any future development plan for Haddenham must include a surface water drainage scheme for the whole village, not a piecemeal assessment for individual planning applications .**

Movement - DfT Connectivity Metrics

26. Data from this tool needs contextualising to have any meaningful use. It does not take into account the suitability of the routes or their current state of maintenance.

Movement - Highway network

27. The A418 is stated to be 60mph as it runs past the area, this is incorrect, there is a section of 40mph either side of the Thame Road junction, and as one travels towards Aylesbury the speed limit reduces to 50mph until it reduces to 30mph at Stone, so only a relatively short stretch is 60mph in the Aylesbury direction.
28. Traffic through the centre of Haddenham has increased significantly due to growth in Haddenham and the surrounding area. Our Mobile Vehicle Activated Sign (MVAS) has recorded extremely high vehicle numbers when positioned on Stanbridge Road.

If growth is as proposed like an ‘onion layer’ surrounding the existing village then traffic through the centre of village will become beyond any acceptable level.

29. There is no mention of parking in the highway assessment. This is a significant problem surrounding the station, primary schools and village hall. Parking on the roads to access local services creates a major congestion and hazard to cyclists and pedestrians. There is no capacity to cater for additional residents using these existing facilities.

Implications and mitigation

30. There are limitations on the existing village roads (Thame Road, Fort End, Banks Road, Woodways, Stanbridge Road, Churchway, Aston Road and Church End) that currently suffer from the impact of traffic and parking. Whilst some improved traffic calming has been identified in the Parish Council’s Streetscape project it does nothing to address the volume of traffic. Something more radical would be needed.
31. Commuter parking in residential roads near the station has become a major problem. As a designated Parkway, the station serves Thame, Haddenham and the surrounding area over a large radius. The implications of this have never been properly addressed. Access to the station is currently via Thame Road and the main east-west route through the village. **If there is to be development of this scale then a new access to the station from the A418 with an extension to the car park is proposed by the Parish Council in order to take traffic away from the centre of the village.**
32. The assessment states that *‘To the southwest of Haddenham, the A418-A4129 roundabout on the edge of Thame can significantly experience congestion during the weekday peak periods’* which may require physical mitigation. What could possibly be done that would mitigate for traffic from an extra 5-7000 homes, having stated that it will be a *‘key route to access the M40’*? The interactive map also shows an allocation south of Long Crendon for 30 hectares of employment land, which would be served by the same roundabout. For growth at this level there must be a serious solution to take cars off the road in significant numbers e.g. a tram or segregated busway between Thame and Aylesbury.
33. Similarly no assessment is made of traffic into and then within Aylesbury, despite section 7 stating that there is relatively little employment opportunity within Haddenham, whereas Aylesbury is *“a priority town for economic growth and regeneration”* and is also close *“to nearby growth sector assets such as Westcott Park and Stoke Mandeville Hospital”*, implying *‘good future employment potential’*. Neither of the latter two are realistically accessible via public transport or active travel, meaning that everyone will drive.

Movement – Rail Transport

34. The study states that *'It is unlikely improvements to rail services would be secured as a result of development in this area.'* So why is proximity to the station listed as an opportunity (scored 'high' in the assessment table 5.1)? Chiltern Railways 2030 business plan is aware of the pressure of demand from recent growth, but pre-dates the requirements of the draft Local Plan for Bucks. Passenger experience with standing room only on many trains suggests there are already capacity issues, and Marylebone in particular cannot be expanded, suggesting limited scope for further improvement.
35. Whilst it is stated that development to the east would be 20-30 minutes' walk to the station this would be reliant of the inclusion of new cycling and walking connections. These have proven difficult to achieve over multiple planning applications in recent years with little support from planning officers to ensure their inclusion. Indeed, in a recent example on VALP site HAD007 land west of Churchway a vital pedestrian connection has been removed by the local planning authority (the Parish Council is currently challenging this).
36. A temporary cycle lane on Thame Road trialled during the pandemic with Emergency Active Travel Plan funding was not retained as it was not considered feasible in the long term so it cannot be stated that station improvements *'could include onward active mode connections to wider Haddenham'* as this has already been assessed. What is needed and has proven undeliverable for around 25 years is the cycleway to Thame to improve access to the station.

Movement – Active mode routes

37. The study states that *'There are currently poor active mode links to Thame where there are a higher order of key services and shops'*. This has not been addressed over recent years when the village has absorbed growth of c. 1200 homes in 13 years, despite a planned link to Thame having been part of the grounds for one large development being approved on appeal by the secretary of state, and despite campaigning by both Haddenham and Thame over 30 years for a greenway between the two settlements. The route alignment on leaving the station needs to be safeguarded **now** before land is allocated for other development. This greenway should also extend eastwards to Aylesbury, but the study makes no mention of the lack of safe active travel links to anywhere else. This includes the secondary schools that take many, possibly the majority, of village pupils in Aylesbury, Princes Risborough and Waddesdon. The nearby village of Cuddington is only accessible via a dangerous crossing over the A418; despite requests for a safer junction funded by recent development, the only change has been to widen access to the junction to make it yet more car friendly.

38. We score 'medium' for access to existing or committed strategic active mode routes, when the document admits that there are none. Similarly we score 'medium' for 'proximity and sustainable connectivity to Key Employment areas' when there is no sustainable connectivity at all to two of the three employment areas listed.

People – Existing Infrastructure

39. The study lists 2 primary schools: there in fact 2 infant schools and one junior school, but no full primary school. 6 food shops are listed: there are 5 (2 small supermarkets, 1 green-grocer, plus limited food offers at the post office and garden centre). The green-grocer is a community-owned enterprise. The library is supported financially by the Parish Council as BC funding reduces. 3 pubs and the sole restaurant have closed despite growth by 1134 homes during the VALP period. According to the study no further shops, pubs or restaurants will be required. This suggests the reliance on Thame will only increase.

40. There is an existing traveller site on Baghill Lane on the north west site (north of Thame Rd and west of the railway). We understand that development should avoid surrounding such sites.

Economy – Existing & Potential

41. Thame is not mentioned but has a growing number of employment sites; likewise, nearby Long Crendon (see para 32). The surprising omissions are London & Oxford (eg universities and hospital), both accessible by rail, which is surely the principal reason so much growth is being proposed. Oxford is also accessible by the regular bus service connecting Aylesbury and Oxford.

Implementation

42. 1134 homes have been built in Haddenham over 13 years under the VALP: a delivery rate of under 85 per year. The study's trajectory of 3500 homes in the Bucks local plan period would require twice this rate, which looks unrealistic on current performance. The developers have told the Parish Council that the main contributory factor is BC's resourcing ability.

Opportunities Plan (page 73)

43. A corridor of green space is shown along the east side of Churchway north of the Green Lane bridleway. Planning permission has been granted for 89 homes on this site and there is a live reserved matters application. (23/00311/AOP and 25/02312/ADP). The south east corner refers to an airstrip. The PC is not aware of one or any proposal for one.

SUMMARY OF SITE- SPECIFIC COMMENTS BY GEOGRAPHICALLY GROUPED LOCATIONS

Summary comments on Haddenham South West site (south of Thame Rd & west of Station Rd)

- Should **not** be developed because of landscape value, recreation value, biodiversity value, proximity to conservation area and heritage assets.

Summary comments on Haddenham North-West sites (north of Thame Rd & west of railway) and site south of station, west of railway & east of Station Rd

- Snakemoor designated Local Nature Reserve should not to be isolated and fully enclosed. Create green corridor southwards to link with high value landscape field (above).
- Safeguard route alignment of Thame greenway on leaving station NOW
- Existing traveller site on Baghill Lane not to be enclosed
- Create new access to station from A418 and extend station car park to limit traffic into central village
- Problem of introducing new utilities infrastructure particularly waste water/sewage across railway in cutting

Summary comments on Haddenham North sites (east of railway & west of Churchway)

- Currently 3 parcels of land - probably the least constrained sites
- Current outline application for 700 homes & primary school on airfield north site (western of the 3 parcels)
- Need to ensure walking & cycling connectivity to station, Co-op supermarket & Airfield Pavilion facilities from remaining parcels NOW before airfield north access is finalised
- Radically improve Kings Cross (A418/Cuddington) junction for vehicle safety and active travel modes

Summary comments on Haddenham East sites (east of Churchway/Stanbridge Rd)

- Watercourse known as Folly Farm ditch must be retained as green corridor for wildlife, biodiversity, recreation and not enclosed by development
- Radically improve Kings Cross (A418/Cuddington) as above and Stanbridge Rd/Lower Rd junctions for vehicle safety and active travel modes