

LOCAL PLAN FOR BUCKS REG.19 CONSULTATION, AUG-SEPT 2026
RESPONSE BY HADDENHAM PARISH COUNCIL

Context

1. Haddenham Parish Council is not anti-development. We have worked with developers to achieve significant community benefits. The absence of 5YHLS and a unitary Plan promised by 2025 has resulted in unplanned development without matching infrastructure. The scale of growth proposed opens big questions about infrastructure and deliverability. We regret the haste of the Plan's later stages with limited consultation and response time, and failure to engage with proactive local councils able to help inform. Our comments relating to the Plan's soundness are attached. **We wish to be represented at the inquiry to present additional evidence from ongoing work.**

Housing Strategy Comments

2. **The Plan concentrates 75% of housing growth in the north** of the County, where only 37% of Bucks population lives. **By not releasing any grey belt sites**, the Plan is: inconsistent with national policy; renders such sites open to speculative development pressure; and loses an opportunity to even up the distribution of growth across the County. *[Sound; effective; national policy]*
3. **The Plan relies heavily on large strategic allocations** materialising in the latter part of the plan period, representing a **high deliverability risk**. In Haddenham over 1100 homes have been built during 13 years since the start of the VALP (Vale of Aylesbury Plan) period: a delivery rate of under 85 per year. The Plan's trajectory of 4,150 over 20 years would require 2.5 times this rate, which looks unrealistic on recent performance. Developers have told the Parish Council that their main blockage is **Buckinghamshire Council's resourcing ability**, which realistically is unlikely to improve in the medium term. *[deliverable]*
4. Conversely, reliance on stepped-up development in the latter period carries the **risk of under-performance in the early period** resulting in speculative applications. In recent years some 600 dwellings have been approved in the absence of a 5YHLS, with a further 3 speculative applications for 1300 houses currently awaiting determination. Housebuilding is being delivered in abundance, but not Planning. The Local Plan must provide effective delivery throughout its 20 years. *[effective; deliverable; national policy]*
5. **The Plan fails to identify a comprehensive delivery strategy for NESS sites like Haddenham. It relies on housebuilders, with individual site contributions to community infrastructure decided through the development management process** with consequent random (in timing and location) amounts of funding, and delivery after the housing is occupied. The Plan relies on building a large quantity of market housing for sale as the sole means of procuring relatively limited numbers of the housing most needed,

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particularly social rented as identified in Buck's Housing Needs Assessment and other sub-market affordable options. High-quality social infrastructure delivered in advance holds the key to creating sustainable communities where people want to live. Escalating building costs make it unlikely developers will be able to finance such projects on their own. The Local Plan should be considering **alternative approaches**, such as modern public-private partnerships. *[effective; deliverable]*

Haddenham Specific Comments

6. **Haddenham's experience of recent growth is a legacy of struggling infrastructure** with full schools, children having to attend schools outside the village, classroom sizes at the maximum allowed, over-stretched health & dental services, traffic & parking problems, drainage & sewage overflows. No master plan or Supplementary Plan of any kind has been done. Obligations in the Neighbourhood Plan to carry out both education and traffic impact assessments were not undertaken, leaving the Parish Council to carry out a traffic impact report and to write a sports & recreation plan. Our local authority has approved the closure of 3 of our 5 pubs while yet approving substantial housing growth. **We will start the Local Plan with an infrastructure deficit, and have been informed that the Plan will not address existing deficiencies.** *[sound; national policy]*
7. **Haddenham SEA Scoping Study not evidenced.** Given this situation in March 2025 the Parish Council commissioned AECOM to prepare a Strategic Environmental Assessment Scoping Study (SEA 2025) to inform a Neighbourhood Plan review. A copy of this is submitted as a separate document. Our Reg 18 response to Bucks Council in March 2026 cited several issues identified in the SEA, but there is **scant evidence that these are addressed.** *[effective; evidence]*
8. **No employment opportunities created.** No additional employment land is envisaged in the Local Plan. It is **unclear where people seeking employment amongst the additional 10,000 residents by 2045 will find work.** The 2021 census suggests 40% of these will do so by car, with road and active travel implications both in Haddenham and beyond, particularly towards Aylesbury and Oxford (which is barely mentioned). **An active travel link to the proposed 30ha employment land at Long Crendon**, whilst mentioned under the employment allocation LOC02 for Long Crendon, **is not referenced within NESS005.** *[sound; effective]*
9. **Heritage impact not assessed. Haddenham is a Tier 3 settlement with a rich heritage.** It isn't a town but a large rural village with a medieval core and street

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pattern, a large Conservation Area with 120 listed buildings, known for its wychert buildings and walls, merits its own chapter in the Buckinghamshire Historic Towns Report 2008 (English Heritage, BCC & AVDC), and is comprehensively described in Conservation Area reviews in 2008 and 2025. The latter identifies the problem of heritage erosion caused by growth and increased traffic. **The Plan fails to assess the harm to the village's heritage assets.**
[effective; national policy]

10. **Retail.** There has never been a traditional “town centre” with a High Street or Market Square (Haddenham’s market moved to Thame in 1302), but only what NPPF calls a “neighbourhood centre”. Yet the Settlement Review assesses that Haddenham has “an extensive range of services and facilities”, defined at EC8 as a “Local Centre” and shown on the Plan located at Banks Parade/Fort End. This fails to understand that Haddenham’s retail offering is not located in a single centre. Shops are distributed across the village, not conveniently located together as they would in a town centre; notably the post office, the pharmacy and the larger convenience store all have different edge of settlement locations some distance from the “Local Centre”. By adding another 4,150 dwellings, with more beyond the Plan period, the Plan risks creating what can best be characterised as “**field sprawl**”. **The Plan offers no real vision for the form and function of this settlement resulting from such significant expansion.**
[sound; effective; national policy]

11. **Recent development in Haddenham has demonstrated that both the foul water and water supply networks are at capacity** and not coping. Local Plan supporting documentation 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)*”. Residents of the new developments at Stanbridge Road (Rectory Homes) and by the station (Persimmon) have suffered sewage overflows 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. Thames Water has responded to two current speculative planning applications for over 1000 dwellings on NESS005 land saying that **neither fresh water, foul water nor surface water networks have sufficient capacity to support these developments**. The Plan presents **no evidence that these utilities can be delivered**. [sound; deliverable; national policy]

12. **Surface Water drainage** Recent development has allowed controlled discharge of surface water into the water course (EA designated “main river”) that runs through north-south through the centre of Haddenham, known as the

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Haddenham stream. In the last two years there have been two major flooding incidents of properties bordering the stream causing damage to buildings and belongings. The watercourse was not safeguarded in earlier development leaving 100 properties with riparian responsibilities for maintenance. Many residents are unaware of, or unable to, maintain their responsibility. The Parish Council is supporting residents to reduce the flooding risk and Bucks Council as LLFA will be undertaking a S19 Flood & Water Management Act review, so is aware of the problem. The NESS site assessment doesn't reference the main river under Relevant Water Bodies. **The Plan regards Haddenham as flood-free risk and makes no reference to this matter.** *[effective; evidenced]*

13. **Density.** NESS density is prescribed as 50dph, using a figure in the Dec 2025 draft NPPF for development near stations. This is **too dense in a rural village situation.** The final 2026 NPPF has reduced this figure to 35 dph, acknowledging that 50dph was inappropriate in some circumstances. The size of the NESS means some parcels are distant from the station. A current planning application 25/02417/AOP has assessed the existing housing density of the village to determine an appropriate density for their proposal. Their design and access statement states "The overarching density of these sites is in the region of 30-35 dwellings per hectare (dph). Generally sites increasing the development edge of Haddenham have an average density of 30dph, whilst some of the newer sites to the south and within the settlement boundary are closer to 35dph". **We urge a comparable reduction in the immediate vicinity of the station, with graded reduction with distance away.** *[national policy]*
14. **Railway Station.** Haddenham's "sustainability" assessment derives in large part from its railway station. Shared with Thame, with the Parkway designation serves a wide catchment. **But only 2.4% of Haddenham residents travel to work by train** in the 2021 census, down from 8% in 2011 despite growth. So **why is the station the focus for growth when so few in employment use the train?** By contrast 48% work from home, and 40% use the car. What Haddenham does experience is a large daily inflow of cars from Thame and the wider area along country lanes and through village streets, and a severe commuter parking problem on roads near the station by people avoiding station parking charges, generating repeated residents' complaints. The station's location will be **beyond the active travel 20-minute walking threshold from some proposed development in the village**, with every likelihood of adding to existing traffic and parking problems. There **is no assessment of additional station parking** arising from growth in Haddenham, Thame and beyond in the wider Parkway catchment. *[sound; effective]*

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15. **Rail Service operating near or at capacity.** All towns along the line have experienced growth, with more to come. Track infrastructure and London Marylebone in particular have no room to expand. Notwithstanding an efficient train operating company, the common experience is increasingly overcrowded trains, with standing room only to/from London. **No evidence is presented that rail transport infrastructure capacity will keep up with demand**, undermining the Local Plan's statement that the station provides "opportunities to support sustainable travel patterns". *[sound; evidenced; deliverable]*
16. **40% of Haddenham residents use the car to get to work not reflected.** Local Plan growth will mean residents experience increasing congestion and journey times, in particular east to Aylesbury, and west to Thame & Oxford, where many Haddenham residents work. The employment implications of Haddenham's growth are not even considered – see para 8 above. Existing problems approaching Aylesbury on the A418 are recognised in the Local Plan but not addressed. The Plan says Haddenham is close "to nearby growth sector assets such as Westcott Park and Stoke Mandeville Hospital" for employment potential. Neither of these are realistically accessible via public transport or active travel, meaning that everyone will drive. **Likely continuing reliance on the car requires modelling of more comprehensive and radical solutions.** *[effective; evidenced; deliverable]*
17. **Cross-border co-operation inadequate.** Haddenham is adjacent to the Oxfordshire border, with strong inter-dependence with Thame. Comments from Oxfordshire County Council are simply "noted", and left for future consideration under development management. An example is congestion at the A418/A4129/B4010 roundabout outside Thame, which will have to manage Haddenham's growth and the Local Plan's proposed 30 ha expansion of the Long Crendon business park on the B4010. There are no comments from SODC or from Thame Town Council, suggesting no active contact. Haddenham hosts the shared Haddenham & Thame Parkway railway station. Contrary to the Local Plan's assumption, Thame, rather than Aylesbury, is our principal service centre (eg for weekly market, retail, secondary school for many Haddenham children, employment). The retail assessment for example includes Haddenham within the Buckinghamshire Rural Zone 6 area, rather than in the Thame/Chinnor Zone 7 area, which would seem more appropriate. Thame has expressed concern to us about Haddenham's growth implications through both the Town Council and its MP. We do not sense they are being addressed. *[sound; effective; evidenced]*
18. **Active Travel lacks ambition. Haddenham-Thame Greenway** also requires cross-border co-operation and is the subject of a 25-year campaign by residents in both Haddenham and Thame. Although recently included in Buck's LCWIP,

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this has never been given priority. This **should be essential infrastructure**, along with the proposals to extend the greenway from **Haddenham to Aylesbury** which sits entirely within Buckinghamshire. The statement within the Sustainability Appraisal for Haddenham NESS that ‘recent growth has delivered new strategic pedestrian and cycle links’ is simply not true: S106 contributions are still being held by Buckinghamshire Council with no progress being evident. The Parish Council tries to secure active travel connectivity between sites within the village but has twice recently experienced obstruction from Bucks Council, undermining confidence that active travel connectivity objectives in the proposed NESS master plan will be effective. There’s **no mention of the active travel implications** of the proposed new schools likely serving a wider catchment, nor of the proposed employment allocation at Long Crendon. *[effective; national policy]*

19. **Loss of Best & Most Versatile agricultural land not assessed.** Land around the village contains a high proportion of BMV and remain in productive agricultural use. There is **no assessment of how much BMV would be lost**, or the resultant risks of losing such land from food production given increasing concerns about food self-sufficiency and climate change. Our experience is that these matters are always brushed aside, yet are surely integral to land-use planning. *[sound; effective; national policy]*

20. **Lack of forward planning for Health Facilities. Baseline Infrastructure Assessment** under Medical **proposes no expansion of medical facilities** at Haddenham, whilst other NESS sites will require expansion. The draft plan itself requires onsite primary care or an offsite contribution. It is hard to believe that the existing facilities will be sufficient to serve an estimated additional 10,000 new residents by 2045. **How is this being assessed?** It also notes that no S106 contributions will be sought because BOB ICB has no strategy for new infrastructure. Haddenham Health Centre was opened in 2004. It is capable of expansion with under-used internal space and vacant unused land, part of which was recently sold and fenced off. **This land should surely be allocated for health use only in the Local Plan. This lack of quantified forward planning must be addressed.** *[sound; evidence]*

21. **Aston Road HAD01 site questions.** The Local Plan includes at HAD01 a housing site for 560 dwellings on land south of Aston Road. There is no explanation why this is not included in the NESS005 site, and thereby excluded from wider NESS infrastructure considerations. Also concerning is that in response to the Parish Council’s SEA Scoping Study 2025 and our subsequent “Future Haddenham” exhibition, we were advised by Bucks Council that this land **should not be considered for development for heritage reasons and should be excluded**

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from our scenarios because of its proximity to the historic core of the Conservation Area at Church End. The distance of this site from the station reduces its sustainability but is not considered. A small part of the site has previously been given planning permission to extend the adjoining St Mary's (Infants) School, although not implemented. The Local Plan's growth proposals must surely suggest extending St Mary's School, along with an opportunity to resolve current school parking problems and related heritage erosion at Church End itself. This could be readily facilitated as the land is owned by Bucks Council, the local education authority. Yet the Council is seeking to maximise the land's value by using it entirely for housebuilding outside the NESS infrastructure obligations. **This matter surely demands independent review.** *[sound; effective; national policy]*

22. **NESS005** at chapter 6 and the Proposals Map **includes land south of Thame Rd & west of Station Rd and of the railway which has not been assessed.** The Parish Council have previously objected to the inclusion of this parcel of land in the overall NESS, but this is not acknowledged. The Parish Council believes this should not be developed because: it has high landscape value; has long-distance views including to the Chiltern ridge; borders the Conservation Area; has long been a breeding ground for RSPB "Red" category protected Skylarks (Wildlife & Countryside Act 1981); is in part steeply contoured, unlike most of Haddenham. It shows land for recreation which would be on a slope and does not fit with the PC's recreation plan or take into account buildings, noise, light pollution and vehicle movements associated with sports facilities; it also contains a very popular rural walking pathway. This all suggests a quick desk-top assessment rather than familiarity with the situation on the ground. We note the **site is not included in the HELAA review and we ask that it be entirely excluded from NESS005.** *[effective; national policy]*

23. **NESS005 includes Budnall Farm land** south of Aylesbury Road and west of Churchway but **has not been assessed** in the HELAA. NESS005 also includes at chapter 6 specific reference to Wheatclose Cottage. This is in Scotsgrove (OX9 postcode), so unclear why singled out. *[sound; evidence]*
24. **Small sites in Appendix K** includes land adjoining Carwithen Close for 25 dwellings, where Bucks Council granted planning permission in 2025 for 15 dwellings. *[sound; evidence]*