

PART A: Contact Information

For official use only

You must provide a contact name and address.

Please complete Part A in BLOCK CAPITALS as appropriate.

Please use black font or pen throughout

	Person/Organisation	Agent (if applicable)
Title	MS	
First Name	KAREN	
Last Name	PARNELL	
Job Title	CLIFFORD CHAMBERS & MILCOTE PARISH CLERK	
Organisation	CLIFFORD CHAMBERS & MILCOTE PARISH COUNCIL	
Address	109 ST MARY'S ROAD	
	STRATFORD-UPON-AVON	
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Notification of subsequent stages of the Site Allocations Plan

Please specify if you wish to be notified of any of the following:

- Submission of the Site Allocations Plan for independent examination Yes No
- Publication of the recommendations of the person appointed to carry out an independent examination of the Site Allocations Plan Yes No
- Adoption of the Site Allocations Plan Yes No

How we will use your details

Please note that your response will be published on the District Council's website. However, this will exclude the postal address, telephone number and email address of individual respondents. The details of respondents will only be retained by the District Council for the purposes of consulting on Development Plan and supplementary documents and will not be used for any other purpose.

PART B: Your Representation

For official use only

Ref: /

Please use a separate form for each representation

Please use black font or pen throughout

Name of Person / Organisation (if appropriate) making representation:

Name:	CLIFFORD CHAMBERS & MILCOTE PARISH CLERK
Organisation	CLIFFORD CHAMBERS & MILCOTE PARISH COUNCIL

1. To which part of the Proposed Submission Site Allocations Plan does this representation relate?	
Policy/Proposal Reference	See attached representation
Section/Paragraph Number	See attached representation
Map Reference	See attached representation
Annex / Appendix Number	See attached representation

2. In respect of this part of the Plan, do you consider the Proposed Submission Site Allocations Plan is:		
(a) Legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(b) Compliant with the Duty to Co-operate?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

The considerations in relation to the Site Allocations Plan being compliant or sound are explained in the Guidance Note available at www.stratford.gov.uk/siteallocations.

If you have answered **No** to Question 2(a), please go to Questions 3 and 4.

If you have answered **No** to Question 2(b), please go to Question 5.

If you have answered **No** to Question 2(c), please go to Questions 6, 7 and 8.

Otherwise, please go to Questions 9, 10 and 11.

3. In what way do you consider this part of the Site Allocations Plan is not legally compliant? Please be as precise as possible.
See attached representation

4. What modification do you consider is necessary to make the Site Allocations Plan legally compliant? You should explain why this modification would make the Plan legally compliant.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representation

5. In what way do you consider this part of the Site Allocations Plan is not compliant with the Duty to Co-operate? Please be as precise as possible.

It should be noted that any non-compliance with the Duty to Co-operate is incapable of being resolved through modification at the Examination.

See attached representation

6. In what respect do you consider this part of the Site Allocations Plan is unsound?

(i)	Not positively prepared	X
(ii)	Not justified	X
(iii)	Not effective	<input type="checkbox"/>
(iv)	Not consistent with national policy	X

7. In what way do you consider this part of the Site Allocations Plan is unsound? Please be as precise as possible.

If you wish to comment on more than one of the four matters of soundness in relation to a specific aspect of the Plan, please complete a separate Part B sheet for each one.

See attached representation

8. What modification do you consider is necessary to make the Site Allocations Plan sound, having regard to the test you have identified at Question 6?

You should explain why this modification would make the Site Allocations Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representation

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

9. In what way do you support the legal compliance or soundness of the Site Allocations Plan?

See attached representation

10. Does your representation relate to another document associated with the Site Allocations Plan, e.g. Sustainability Appraisal, Strategic Housing Land Availability Assessment? If so, please specify below with your comments on it.

See attached representation

11. Do you wish to express an interest to participate in the Examination?

- Yes,** I wish to participate at the oral Examination **X**
- No,** I do not wish to participate at the oral Examination

If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Site Allocations Plan is it appropriate for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the District Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.

We wish to be involved as we believe Clifford Chambers and Milcote should be removed from the SAP.

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature:

Date:

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

Clifford Chambers & Milcote Parish Council (CCMPC) finds the Stratford-on-Avon (SDC) Site Allocations Plan (SAP) unsound in its findings and that SDC has failed in its Duty to Co-operate specifically in regard to CCMPC, specifically:

1. The SAP ignores the local evidence base provided to SDC that was formulated through in-depth local assessments, rigorous research and analysis by the CCMPC, an independent Planning Consultant and consultation with SDC officers. All of which formed the basis of Clifford Chambers & Milcote's Neighbourhood Plan (CCMNP). The SAP assessments are a high level, desk top exercise made without site visits. All detailed local assessments, based on site visits and consultations with the community, were provided to SDC at the time of consultation and have subsequently been ignored in this SAP.

The government's guidance on Neighbourhood Planning states:¹

“What if a local planning authority is also intending to allocate sites in the same neighbourhood area?”

If a local planning authority is also intending to allocate sites in the same neighbourhood area, the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.”

In this way, SDC has not fulfilled its Duty to Co-operate and has seriously undermined the spirit of the Localism Act (2011).

2. The SAP does not take the CCMNP into account at all. It disregards and contradicts a parallel plan making process which is not in the spirit of neighbourhood planning. Moreover, the Parish of Clifford Chambers & Milcote has submitted its Reg 16 NP Submission in early September 2019 and should be at examination stage directly after the associated consultation period. Its NP includes a reserve site. It should therefore be considered for removal from this SAP as its NP will have reached an 'advanced stage' before the SAP is examined as identified and defined in the quote below in reference to the parishes of Ilmington and Tysoe.

“It should be noted that Ilmington and Tysoe parishes are included within the Site Allocations Plan at the current time. Both neighbourhood plans, however, identify reserve housing sites and are moving towards an advanced stage of preparation (i.e. examination) later this year. As such, in line with its approach, it is likely that the Council will need to remove sites in both parishes from the Site Allocations Plan prior to formal submission.” (Paragraph 3.6, Report to SDC Cabinet Members the Council's Proposed Submission Site Allocations Plan for statutory Regulation 19 Representations Period Public Consultation (15 July 2019), by John Careford, Policy Manager, Enterprise, Housing and Planning²)

¹ Paragraph: 043 Reference ID: 41-043-20140306 9 (<https://www.gov.uk/guidance/neighbourhood-planning--2>)

² <https://democracy.stratford.gov.uk/ielistDocuments.aspx?CId=485&MId=5575&Ver=4>

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

CCMPC strongly supports the approach set out in the report to the Cabinet above that Ilmington and Tysoe should be excluded from the SAP process as the INDP is at an advanced stage and includes a reserve site. The same approach should be considered for Clifford Chambers & Milcote.

By not giving due weight and consideration to an NP that has planned positively for future development in line with NPPF (Feb 2019 paragraphs 11, 16 and 35a), the SAP ignores the wishes of a community who have invested a great deal of time working on this important local planning document.

CCMPC asserts that as a result of the above, SDC cannot 'satisfy the tests of soundness relating to positive preparation and effectiveness'³. SDC also cannot show that they have worked 'collaboratively with other bodies to ensure that strategic priorities are properly co-ordinated and clearly reflected in Local Plans.'⁴

CCMPC's specific comments are outlined in the table on the following pages.

³ (SDC's Statement of Compliance with the Duty to Co-operate, July 2019 paragraph 2.1.3).

⁴ (SDC's Statement of Compliance with the Duty to Co-operate, July 2019 paragraph 2.1.3).

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

CLIFFORD CHAMBERS AND MILCIOTE’S SPECIFIC OBSERVATIONS RE THE PLAN

POLICY REF	PARAGRAPH	PAGE NO.	COMMENTS
Part A Annex 1	Reserve Housing Sites	p.58 p.147	<p>RESERVE SITES</p> <p>Density: The dwelling capacities of 30 and 35 dw per hectare as suggested in Annex 1 do not take into account Clifford Chambers & Milcote Villages’ rural nature or settlement pattern as noted in SDC Core Strategy CS.16 and would be inappropriate. The densities cited in Annex 1 of either 30 or 35, are urban densities. This is particularly concerning as Site CLIF.A of the SAP was considered by the local community for development and overwhelmingly rejected. Moreover, it has been identified locally as an important Valued Landscape in the CCMNP. This has not been taken into account.</p> <p>For this reason, this part of the SAP is unsound and has not fulfilled its Duty to Co-operate.</p> <p>Proposed Numbers of Dwellings: SDC Core Strategy CS.15.D (Local Service Villages) sets out that ‘the scale of housing development that is appropriate in each village is specified in the Policy CS.16 Housing Development’. The strategic housing allocation for Clifford Chambers as a Local Service Village Category 4 (LSV4) is for approximately no more than around 32 dwellings (CS.16.B). “The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031.” (CS.16.D). Twenty percent (20%) of Clifford Chamber’s strategic housing allocation would be around 6 dwellings rather than the proposed number of between 48 and 56 dwellings which would constitute between 150% and 175% of the total number of strategic housing allocations. This size of allocation is disproportionate especially as it does not take into account that the majority of the village sits within a conservation area.</p> <p>CCMNP has planned positively for reserve housing allocations.</p> <p>For this reason, this part of the SAP is unsound and has not fulfilled its Duty to Co-operate.</p>

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

POLICY REF	PARAGRAPH	PAGE NO.	COMMENTS
Part A Annex 1	Reserve Housing Sites	p.58 p.147	<p>SITE ASSESSMENTS: Clifford Chambers and Milcote’s proposed reserve site allocation was assessed in detail through CCMNP local research, analysis, public consultation and independent assessment. (See appendix 2.)</p> <p>All this technical analysis was made available to SDC through the Reg 14 and 16 consultation processes as well as the SHLAA consultations but is not reflected in the SAP. For example, the reserve site proposed in the CCMNP is not included in the SAP whereas three sites which were specifically excluded following the CCMNP consultation and assessment process (See Appendix 3 & Appendix 4).</p> <p>For this reason, this part of the SAP is unsound and has not fulfilled its Duty to Co-operate.</p>
SAP.5	Point B	p.24	<p>SAP.5 opens the door to building into the countryside and in some cases extending the built form of a settlement inappropriately. This seems to contradict SAP.6, paragraph 4.1.4 which asserts that part of the purpose of the BUAB is to protect the countryside from encroachment.</p> <p>For this reason, this part of the SAP is unsound.</p>
SAP.6		p.27	<p>BUAB: Clifford Chambers & Milcote NP was submitted in early September 2019 and will become a well advanced NP in that it will be at Reg 16/examination stage⁵ by the time the SAP is submitted to the Secretary of State. It should therefore be considered for exclusion from the SAP.</p> <p>For this reason, this part of the SAP is unsound.</p>
Part A Part C		p.58 p.98	<p>BUAB & Reserve Site Allocation: The BUAB proposed for Clifford Chambers in relation to the positioning of SDC’s proposed reserve site allocation CLIF.C makes no sense. Based on the BUAB proposed by SDC, Site C would be disconnected from the settlement. Whereas, had SDC used the BUAB proposed in Clifford Chambers and Milcote’s NDP, Site C would have been adjacent to the BUAB (See Appendix 1). This demonstrates the lack of co-ordination with and consideration of evidence from the NDP’s qualifying body.</p>

⁵ As defined in Report to SDC Cabinet Members the Council’s Proposed Submission Site Allocations Plan for statutory Regulation 19 Representations Period Public Consultation (15 July 2019), by John Careford, Policy Manager, Enterprise, Housing and Planning - <https://democracy.stratford.gov.uk/ieListDocuments.aspx?CId=485&MId=5575&Ver=4>

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site
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POLICY REF	PARAGRAPH	PAGE NO.	COMMENTS
			<p>For this reason, this part of the SAP is unsound and has not fulfilled its Duty to Co-operate.</p>
Appendix 1	Bullets 7 & 12	p.149	<p>Should the same 'miscellaneous uses' bullet point be included in both the included and excluded sections? This is confusing, contradictory and needs clarifying.</p> <p>For this reason, this part of the SAP is unsound.</p>

Appendix 2. Clifford Chambers Neighbourhood Plan - Reserve Housing Site

APS Ltd - Independent Planning Consultants

Clifford Chambers Neighbourhood Plan Site Assessment - September 2017

Site Address

Land to the north of Stour Field Close, Clifford Chambers

Site Area (approx.) 1 ha

Site Capacity 25 dwellings (25 dpha)

Site Description

The site comprises part of an open agricultural field situated to the north of Stour Field Close, which is a recently constructed development of 3 detached dwellings with a further 2 dormer bungalows under construction. The site is located to the north of the village.

The site currently has no vehicular access but there is opportunity to create an access off Stour Field Close or Campden Road. There is open agricultural land to the north, new residential development to the south and residential garden to the east. The Campden Road forms the western boundary, beyond which there is open agricultural land. The eastern and western boundaries comprise mature hedgerows.

Relevant Planning History

None.

Site Constraints

Status – The site represents undeveloped greenfield land which is currently in productive agricultural use.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

Highways – Access would need to be gained from Campden Road or from the newly built Stour Field Close where the site has road frontage. There is reasonable visibility in both directions at this point on Campden Road but it would be close to the existing Stour Field Close access. Access onto Campden Road would be within the existing 50mph limit. Traffic speeds would need to be measured to ascertain the required visibility and frontage hedge/tree cut back may be needed. Utilising Stour Field Close is likely to be preferable.

Topography – The site is unchallenged by topography.

Landscape – The site falls within Character Zone – CL01 according to the White Consulting Study (2012). The study concludes that the site has a ‘high/medium’ sensitivity to housing development on this site.

The site is reasonably well contained being enclosed by existing residential development to the south and east. There is a mature roadside hedge to the west but the site is open to the north due to the arbitrary nature of the site boundary. The existing roadside hedgerow would provide some screening of development but it would be clearly seen over the top. Localised hedgerow removal required for any new access from Campden Road would reduce the amount of screening available.

Flooding and Drainage – The site falls within Flood Zone 1 (low risk) of river (fluvial) flooding and with the exception of a very small spot on the site, has a ‘very low’ risk of surface water (pluvial) flooding (see map below).

Sustainability and Accessibility – Clifford Chambers has a very limited range of local amenities. There is no school, shop, post office or medical facilities within the village. The nearest primary and high schools are in Stratford-upon-Avon which is approximately 2.5km away.

The 14th Century Parish Church of St Helens is located in the historical core of the village adjacent to the rectory and near the Manor. There is a ‘Jubilee’ Village Hall with a private club next door located in the centre of the village. There is also a village pub (The New Inn) which is located on the western entrance to the village.

Clifford Chambers is served reasonably well by public transport due to its location on the main B4632 and proximity to Stratford-upon-Avon. There is a bus service between 07:00 and 19:40 Mondays-Saturdays but there is no service on Sundays or Bank Holidays. The bus stops are located in Orchard Place at the western end of the village. There is no direct rail access, the nearest railway station being located at Stratford-upon-Avon.

There are pavements and pathways through the village which is generally lightly trafficked because it is effectively a no through village due to the River Stour. There is a wealth of rural footpaths in and around the village and along the banks of the River Stour. The village has no street lighting. The site is approximately 145m from the bus stops in Orchard Place accessed by a route through Stour Field Close. Whilst there are few pavements in Stour Field Close, the route is relatively safe it being a small cul-de-sac and is likely to be attractive to pedestrians.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

Natural Heritage – Being productive agricultural land the site has low ecological value but has potential habitat support for small mammals, birds, insects and invertebrates, some of which may have conservation status. The presence of hedgerows and mature trees in and around the periphery of the site increases the biodiversity value of the site.

Built Heritage – The site is not in close proximity to any listed building or the conservation area so is unlikely to adversely affect the setting of these important heritage assets.

Conclusion

The site is rectangular in shape and effectively ‘rounds off’ the northern tip of the village. The site is closely related to the existing built form of the village but is currently open agricultural land. There is currently good screening and a feeling of enclosure within the site.

A large-scale development in this location would be exposed to open views from the north where there are public rights of way along the river but otherwise development would be reasonably well contained within the landscape.

The village is characterised by linear development along the principal village street with a few small-scale modern cul-de-sac developments together with organic infilling.

There are a number of historical buildings including some conversions within and close to the conservation area. A new large-scale cul-de-sac development on the northern edge of the village is likely to be at odds with the settlement pattern and historic organic growth of the village.

Access to the site from Campden Road would appear deliverable, subject to the provision of the necessary visibility splays. However, this is a fast stretch of B class road where the legal speed limit is currently 50mph but in reality, may be far greater. Speed surveys would be needed in order to inform the necessary visibility splays. Access directly onto the Campden Road would at least prevent large volumes of traffic passing through the currently tranquil village. It may be preferable to access the site off the new Stour Field Close cul-de-sac, subject to capacity and Highway Authority approval. Development is unlikely to affect any public right of way.

Any development would need to ensure satisfactory car parking arrangements in a layout which is not dominated by parked cars as this would detract from a high-quality design.

Being in such close proximity with easy access to Orchard Place, there are strong opportunities for social integration. Development will be able to easily connect, visually, socially and physically into the existing community creating an inclusive development.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

There is an opportunity to retain the existing boundary hedgerows to preserve some amenity and ecological value. Development has the potential to enhance and strengthen existing ecological features and create new habitats with new planting particularly along the northern boundary.

Due to the compact nature of the village the site is very close (145m) to Orchard Place where the bus stops and public house are located. The route to Orchard Place is not currently served by pavements but it is through a small cul-de-sac where traffic levels and speeds are very low.

The site is well drained and does not suffer from a risk of surface water flooding. Housing development would be visible from the north but is likely to be read in the context of the existing village due to the close proximity of existing built form.

The exposed northern boundary would need careful consideration and treatment. Robust landscaping will help soften the development but is unlikely to fully mitigate the impact of any development in the short-medium term.

Based on the land being considered and a density of around 25 dph, the site could accommodate around 25 dwellings. An allocation of this scale would seem excessive given the limited amenities the village has to offer, the existing well-established settlement pattern (which does not include large scale cul-de-sac developments) and the historical rate of growth the village has seen over the years, namely small-scale development and organic infilling.

A smaller development of dwellings to meet local needs, namely, bungalows and 1 and 2-bedroom properties could assist existing residents to downsize from larger houses in the village which would in turn free them up for young families to move into and provide the necessary low-cost housing for young families to occupy. A high - quality design addressing the need for private (or shared) amenity space and adequate parking and accessing arrangements should be a priority. The site has good potential for development given the lack of constraints but a smaller scale development should be considered for the reasons outlined above unless there is empirical evidence for a larger development exists.

Appendix 3. Reserve housing Sites A & B in SDC's SAP

APS Ltd - Independent Planning Consultants

Clifford Chambers Neighbourhood Plan Site Assessment - September 2017

Site Area (approx.) 1.38 ha

Site Capacity 35 dwellings (25 dpha)

Site Address

Land off Campden Road, Clifford Chambers

Site Description

The site comprises part of two open agricultural fields situated to the east of Campden Road and is located on the southernmost tip of the village. The site currently has no vehicular access off Campden Road. There are no pavements along the site frontage with the Campden Road, the nearest being outside the residential property known as Whittcliff to the north. There is open agricultural land to the south and east. To the north the site adjoins the existing village boundary where there are a number of residential properties abutting. There is a line of mature oaks in the north-eastern and north-western corner of the site. There is also a mature hedge with mature trees which dissects the site where it extends into the southern field parcel.

Site Constraints

Status – The site represents undeveloped greenfield land which is currently in productive agricultural use.

Highways – Access would need to be gained from Campden Road where the site has road frontage. There is reasonable visibility in both directions at this point due to the alignment of the road. Access would be within the existing 50mph limit. Traffic speeds would need to be measured to ascertain the required visibility and frontage hedge/tree cut back may be needed. There are currently no pavements outside the site and limited opportunity for connectivity to the existing village. The Nashes, is a private road.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site
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Topography – The site is unchallenged by topography.

Landscape – The site falls within Character Zone – CL03 according to the White Consulting Study (2012). The study concludes that the site has a ‘high/medium’ sensitivity to housing development on this site. The site is not well contained being exposed from the south where there are open fields. However, the north-eastern and north-western boundaries of the site are contained by existing landscaping and residential development beyond. The existing roadside hedgerow would provide some screening of development but it would be clearly seen over the top. Localised hedgerow removal required for the new access would reduce the amount of screening available.

Flooding and Drainage – The site falls within Flood Zone 1 (low risk) of river (fluvial) flooding and has a ‘high’, ‘medium’ and ‘low’ risk of surface water (pluvial) flooding (see map below). The site appears poorly drained in the northern corner where there were signs of pooling water and boggy conditions.

Sustainability and Accessibility – Clifford Chambers has a very limited range of local amenities. There is no school, shop, post office or medical facilities within the village. The nearest primary and high schools are in Stratford-upon-Avon which is approximately 2.5km away. The 14th Century Parish Church of St Helens is located in the historical core of the village adjacent to the rectory and near the Manor. There is a ‘Jubilee’ Village Hall with a private club next door located in the centre of the village. There is also a village pub (The New Inn) which is located on the western entrance to the village. Clifford Chambers is served reasonably well by public transport due to its location on the main B4632 and proximity to Stratford-upon-Avon. There is a bus service between 07:00 and 19:40 Mondays-Saturdays but there is no service on Sundays or Bank Holidays. The bus stops are located in Orchard Place at the western end of the village. There is no direct rail access, the nearest railway station being located at Stratford-upon-Avon.

There are pavements and pathways through the village which is generally lightly trafficked because it is effectively a no through village due to the River Stour. There is a wealth of rural footpaths in and around the village and along the banks of the River Stour. The village has no street lighting. The site is approximately 250m from the bus stops in Orchard Place from the envisaged site entrance. The route would require a pavement extension from Orchard Place into the site to make this route safe and desirable.

Natural Heritage – Being productive agricultural land the site has low ecological value but has potential habitat support for small mammals, birds, insects and invertebrates, some of which may have conservation status. The presence of hedgerows and mature trees in and around the periphery of the site increases the biodiversity value of the site.

Built Heritage – The site is not in close proximity to any listed building or the conservation area so is unlikely to adversely affect the setting of these important heritage assets.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

Conclusion

The site is irregularly shaped and wraps around the southernmost tip of the village on open unspoilt agricultural land. It is shaped in this way in order to ensure road frontage for the creation of a new access to serve the development. Whilst at face value the site appears closely related to the existing built form, there is currently a significant landscape buffer with mature oak trees along the existing southern boundary of the village. A large-scale development in front of this strong landscaped boundary would be exposed to open views from the south and has the potential to be very dominant in the landscape.

The village is characterised by linear development along the principal village street with a few small-scale modern cul-de-sac developments together with organic infilling. There are a number of historical buildings including some conversions within and close to the conservation area. A new large-scale cul-de-sac development on the exposed southern edge of the village is likely to be at odds with the settlement pattern and historic organic growth of the village.

Access to the site from Campden Road would appear deliverable, subject to the provision of the necessary visibility splays. However, this is a fast stretch of B class road where the legal speed limit is currently 50mph but in reality, may be far greater. Speed surveys would be needed in order to inform the necessary visibility splays. Access directly onto the Campden Road would at least prevent large volumes of traffic passing through the currently tranquil village. Development is unlikely to affect any public right of way. Any development would need to ensure satisfactory car parking arrangements in a layout which is not dominated by parked cars as this would detract from a high-quality design.

Being on the edge of the settlement and with limited connectivity to the existing village, opportunities for social integration will be very challenging. It is likely that any development will struggle to connect, visually, socially and physically into the existing community creating an isolated development likely to be occupied by commuters.

There is an opportunity to retain the existing boundary hedgerows to preserve some amenity and ecological value. Development has the potential to enhance and strengthen existing ecological features and create new habitats with new planting particularly along the southern boundary.

Due to the compact nature of the village the site is reasonably close (250m) to Orchard Place where the bus stops and public house are located. The route to Orchard Place is, in part, not currently served by pavements but this could be delivered as part of any scheme to develop the site. Overall the site is reasonably accessible to Orchard Place.

Clifford Chambers and Milcote Parish Council Representation to Stratford-on-Avon District Council Proposed Submission Site Allocations Plan September 2019

The site is very poorly drained and suffers from significant high risk of surface water flooding. This was evident during the site visit undertaken for this assessment. Whilst an engineering solution may be found to resolve this issue, there is doubt over the development of the site given this significant constraint.

Housing development would be highly visible from the south and is unlikely to be read in the context of the existing village due to the presence of mature landscaping and trees which have the effect of hiding the village and making it inconspicuous from the surrounding landscape. The site is currently exposed to the open countryside to the south so this would need very careful consideration and treatment. Robust landscaping will help soften the development but is unlikely to sufficiently mitigate the impact of any development in the short-medium term.

Based on the land currently being promoted and a density of around 25 dph, the site could accommodate around 35 dwellings. An allocation of this scale would seem excessive given the limited amenities the village has to offer, the existing well-established settlement pattern (which does not include large scale cul-de-sac developments) and the historical rate of growth the village has seen over the years, namely small-scale development and organic infilling.

A smaller development of dwellings to meet local needs, namely, bungalows and 1- and 2-bedroom properties could assist existing residents to downsize from larger houses in the village which would in turn free them up for young families to move into and provide the necessary low-cost housing for young families to occupy. A high-quality design addressing the need for private (or shared) amenity space and adequate parking and accessing arrangements should be a priority.

However, based on the scale of the development envisaged, the high risk of exacerbating existing surface water flooding, the likelihood for any development to be highly prominent in the landscape and the limited opportunities for the development to be fully integrated into the existing village, both physically and socially, the site has limited potential for development.

Appendix 4. Reserve housing Site C in SDC's SAP

APS Ltd - Independent Planning Consultants

Clifford Chambers Neighbourhood Plan Site Assessment - September 2017

Site Address

Land west of Rectory Farm, Milcote Road, Clifford Chambers

Site Description

Area: 0.4 ha

Capacity: 10 dwellings (25 dpha)

The site comprises part of two open agricultural fields situated to the west and south of Rectory Farm between Milcote Road and Campden Road. The site is located on the western fringe of the village.

The site currently has no vehicular access off Milcote Road or Campden Road. There are no pavements along the site frontage with the Milcote Road or Campden Road, the nearest being on the opposite (village) side of Campden Road. There is open agricultural land to the south and west. To the north the site adjoins Rectory Farm where planning permission has been granted for the erection of 5 dwellings. There are mature hedgerows along the roadside boundaries but the site is exposed to the open countryside to the south and west.

Status – The site represents undeveloped greenfield land which is currently in productive agricultural use.

Highways – Access could be gained from Campden Road or Milcote Road where the site has road frontages. There is reasonable visibility in both directions on Campden Road but it is in close proximity to the crossroads with the village and within the existing 50mph speed limit. Access off Milcote Road is close to a bend in the road but visibility appears reasonably good. Traffic speeds would need to be measured to ascertain the required visibility and frontage hedge/tree cut back may be needed. There are currently no pavements outside the site and limited opportunity for connectivity to the existing village due to the location of the site on the opposite side of the Campden Road to the village.

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Topography – The site is unchallenged by topography.

Landscape – The site falls within Character Zone – CL02 according to the White Consulting Study (2012). The study concludes that the site has a ‘high/medium’ sensitivity to housing development on this site. The site is not well contained being exposed from the south where there are open fields. However, the north-eastern and north-western boundaries of the site are contained by existing boundary treatments to residential development beyond. The existing roadside hedgerows would provide some screening of development but it would be clearly seen over the top. Localised hedgerow removal required for the new access would reduce the amount of screening available.

Flooding and Drainage – The site falls within Flood Zone 1 (low risk) of river (fluvial) flooding and has a ‘very low’ risk of surface water (pluvial) flooding. The site appears well drained.

Sustainability and Accessibility – Clifford Chambers has a very limited range of local amenities. There is no school, shop, post office or medical facilities within the village. The nearest primary and high schools are in Stratford-upon-Avon which is approximately 2.5km away.

The 14th Century Parish Church of St Helens is located in the historical core of the village adjacent to the rectory and near the Manor. There is a ‘Jubilee’ Village Hall with a private club next door located in the centre of the village. There is also a village pub (The New Inn) which is located on the western entrance to the village.

Clifford Chambers is served reasonably well by public transport due to its location on the main B4632 and proximity to Stratford-upon-Avon. There is a bus service between 07:00 and 19:40 Mondays-Saturdays but there is no service on Sundays or Bank Holidays. The bus stops are located in Orchard Place at the western end of the village. There is no direct rail access, the nearest railway station being located at Stratford-upon-Avon.

There are pavements and pathways through the village which is generally lightly trafficked because it is effectively a no through village due to the River Stour. There is a wealth of rural footpaths in and around the village and along the banks of the River Stour. The village has no street lighting.

The site is approximately 280m from the bus stops in Orchard Place from the envisaged site entrance off the Milcote Road. The route would require crossing the busy and fast Campden Road and walking along a stretch of Milcote Road which has no pavements and a sharp bend.

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Natural Heritage – Being productive agricultural land the site has low ecological value but has potential habitat support for small mammals, birds, insects and invertebrates, some of which may have conservation status. The presence of hedgerows and mature trees in and around the periphery of the site increases the biodiversity value of the site.

Built Heritage – The site is not in close proximity to any listed building or the conservation area so is unlikely to adversely affect the setting of these important heritage assets.

Conclusion

The site is irregularly shaped and wraps around the southern boundary of Rectory Farm to the west of the village on open unspoilt agricultural land. It is shaped in this way in order to ensure road frontage is available on Milcote Road for the creation of a new access to serve the development.

The site is disconnected from the village by the Campden Road which would act as a physical and social barrier to the integration of the site into the local community. However, the Council have set a precedent for development to the west of Campden Road by approving 5 dwellings on land at Rectory Farm. A development of around 10 dwellings would be exposed to open views from the south and has the potential to be very dominant in the landscape.

A small-scale cul-de-sac of well-designed homes (perhaps with a rural theme) could complement the recently permitted development. Such a development on this site would not be read in the context of the rest of the village so is unlikely to detract from its historical character and pattern.

Access to the site from Milcote Road or Campden Road would appear deliverable, subject to the provision of the necessary visibility splays. However, the Campden Road is a fast stretch of B class road where the legal speed limit is currently 50mph but in reality, may be far greater. Speed surveys would be needed in order to inform the necessary visibility splays for both accesses and inform the case for a new pedestrian crossing. Development would not affect any public right of way. Any development would need to ensure satisfactory car parking arrangements in a layout which is not dominated by parked cars as this would detract from a high-quality design.

Being on the edge of the settlement and with limited connectivity to the existing village, opportunities for social integration will be very challenging. It is likely that any development will struggle to connect, visually, socially and physically into the existing community creating an isolated development likely to be occupied by commuters.

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There is an opportunity to retain the existing roadside boundary hedgerows to preserve some amenity and ecological value. Development has the potential to enhance and strengthen existing ecological features and create new habitats with new planting particularly along the southern boundary.

Due to the compact nature of the village the site is reasonably close (280m) to Orchard Place where the bus stops and public house are located. However, the route to Orchard Place would require crossing the busy and fast Campden Road and with there being no pavements around the site, walking to the bus stop may not be desirable for some. To create a safe accessible development, a crossing may need to be considered in consultation with the Highway Authority. Whilst the site may be close to Orchard Place it is not easily accessible due to the Campden Road.

The site appears well drained and is not susceptible to any risk of surface water flooding.

Housing development would be highly visible from the south due to the open and arbitrary nature of this boundary. However, it would be read in the context of the existing Rectory Farm building and associated new development. Careful consideration and treatment of the southern boundary with robust landscaping will help soften any development but is unlikely to completely mitigate the impact of any development in the short-medium term.

Based on the land identified above and a density of around 25 dph, the site could accommodate around 10 dwellings. An allocation of this scale would be on the upper limit of successfully creating and assimilating a small scale organically designed development into the context of the village.

A small development of dwellings to meet local needs, namely, bungalows and 1 and 2-bedroom properties could assist existing residents to downsize from larger houses in the village which would in turn free them up for young families to move into and provide the necessary low-cost housing for young families to occupy. A high-quality design addressing the need for private (or shared) amenity space and adequate parking and accessing arrangements should be a priority.

A development of up to 10 dwellings on this site has some potential but the negative impacts on landscaping and the fact that the site is separated from the village by the Campden Road would weigh against any development as it limits the opportunity for the development to be fully integrated into the existing village, both physically and socially.