

LANDSCAPE & VISUAL NOTE ON THE CLIFFORD CHAMBERS AND MILCOTE NEIGHBOURHOOD PLAN

LAND OFF CAMPDEN ROAD, CLIFFORD CHAMBERS

ON BEHALF OF SPITFIRE BESPOKE HOMES LTD

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CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	DRAFT NEIGHBOURHOOD PLAN	2
3.	SHLAA – COMPARISON	5
4.	LANDSCAPE AND VISUAL ISSUES – COMPARISON	6
5.	SUMMARY	8

1. INTRODUCTION

- 1.1 This Note has been prepared by Pegasus Group on behalf of Spitfire Bespoke Homes Ltd in respect of promoting the site at Land off Campden Road, Clifford Chambers through the Stratford-upon-Avon Council Site Allocations Plan. The Site is located on the south western side of the village of Clifford Chambers, south of Stratford-upon-Avon. It is bounded to the west by the B4632 / Campden Road, which skirts the western edge of the village and links with Stratford-upon-Avon to the north.
- 1.2 The Site has been promoted by Spitfire Bespoke Homes Ltd since 2017 with a *Landscape Appraisal* prepared by Pegasus Group in early September 2018. The Site has been subject to the *Strategic Housing Land Availability Assessment (SHLAA)*, first produced in 2012, with the latest version produced in 2020, as part of evidence base to the now adopted Core Strategy, and is proposed for allocation as a Reserve Site in the District Council's forthcoming Site Allocations Plan (SAP): Site reference CLIF.A and CLIF.B.
- 1.3 A draft *Clifford Chambers and Milcote Neighbourhood Plan: Submission Document* (August 2019) (hereafter referred to as the *Draft Neighbourhood Plan*), has been submitted by the Clifford Chambers and Milcote Parish Council (the Parish Council) for examination. The *Neighbourhood Plan* has identified a single plot for future residential development, but it excludes the land taken through the Council's objective SHLAA assessment. This Note considers the landscape character and visual qualities of the Site, discussed in the context of the *Draft Neighbourhood Plan*, its policies, and work carried out by third parties.
- 1.4 The main purpose of this Note is to provide an objective critique, from a landscape and visual point of view, of the approach adopted in the *Neighbourhood Plan* with regards to their Reserved Site allocation, and assist the Neighbourhood Plan Examiner and Stratford-on-Avon District Council (the ultimate decision-maker on the Neighbourhood Plan) with an additional landscape and visual evidence base.
- 1.5 On-site assessment was carried out in early September 2018 and early August 2020. The purpose of the site visit was to verify the findings of the desk-based review, to confirm the landscape and visual qualities of the Site, and verify information in the published assessments. At the same time the assessor considered the Reserved Site, as proposed in the *Draft Neighbourhood Plan*.

2. DRAFT NEIGHBOURHOOD PLAN

2.1 The *Draft Neighbourhood Plan* includes a number of policies that relate to the natural environment with one of its Strategic Objectives aiming: **“To protect important landmarks and valued landscapes”**. This is supported by Policy NE2 To Protect Valued Landscapes and Skylines, which states:

“In order to maintain the distinctive and inobtrusive character of the Village, all new development must have regard to the landscape character and protect valued landscapes. Proposals which have an adverse impact will not be supported.”

2.2 The above quoted Policy NE2 is the only relevant policy in terms of landscape and visual issues. Policy NE4 Maintaining ‘Dark Skies’ and its supporting text relate to issues of design and light pollution within the village, rather than potential effects upon the surrounding landscape or its tranquillity.

2.3 The *Draft Neighbourhood Plan* goes on to identify Martin’s Hill, located south of Clifford Chambers, as being ‘valued landscape’ and a key landmark in the Parish, visible from the edge of the village. In addition, a line of mature oak trees, along the southwestern edge of the village, has also been identified and have been described as a ‘distinctive feature’.¹

2.4 The *Draft Neighbourhood Plan* including Policy H1 and Policy NE2 is not supported by any professional landscape or visual analysis. We understand that the Parish Council revealed in comments responding to the Regulation 16 consultation responses that the only site assessment work which had been carried out by a planning consultancy APS Avon Planning Services over three years ago: *Site Assessment - September 2017* document.

2.5 The APS website does not list any landscape architects as its employees and their 2017 *Site Assessment* document lacks any credentials that would confirm their professional expertise. It is not clear whether the planning consultants were aware of or sufficiently experienced to utilise the available guidelines namely the *Guidelines for Landscape and Visual Impact Assessment* Edition3 2013 (IEMA & Landscape Institute); *An Approach to Landscape Character Assessment* 2014 (Natural England); *An Approach to Landscape Sensitivity Assessment - To Inform Spatial Planning and Land Management* 2019 (Natural England); or indeed the

¹ *Draft Neighbourhood Plan*, Figures 6(a), 6(b), 7(a), 7(b), pp. 26-27.

now out of date *Topic Paper 6: Techniques and criteria for judging capacity and sensitivity* (The Countryside Agency). The document does not refer to these documents and has various evidential gaps and inaccurate statements, which would have been avoided had a robust methodology been employed. We shall set these out below.

- 2.6 In contrast, Pegasus Group and its qualified landscape practitioners have been supporting Spitfire Bespoke Homes Ltd since 2017 with Pegasus Group's *Landscape Appraisal* (September 2018) prepared by a Chartered Member of the Landscape Institute with over 10 years of experience in LVIA work. All of this is evident in the submission documents which were provided to the District Council in support of the SHLAA: *Landscape Appraisal* (Prepared by Pegasus), *Technical Note - Pre application Flood Risk and Drainage Technical Note* (Prepared by Hydrock) and *Update note* (prepared by Hydrock), and *Technical Note Highways* (BWP), and latterly provided to the Parish Council in the Regulation 14 consultation response and the Regulation 16 consultation response.
- 2.7 With regards to the Site, the *APS Site Assessment* states that: **"The site is not well contained being exposed from the south where there are open fields. (...) A large scale development (...) would be exposed to open views from the south and has the potential to be very dominant in the landscape. (...) Housing development would be highly visible from the south..."**
- 2.8 The *APS Site Assessment* fails to recognise the screening provided by the intervening field boundary and roadside vegetation, and also very limited public access in this part of the landscape. The Site is well contained. Views from the south along the B4632 are considerably interrupted by trees and hedgerows, with views already influenced by built form, including modern large scale dwelling.
- 2.9 The *APS Site Assessment* also asserts that: **"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."** This statement is at odds with the Council's own assessment in the SHLAA. The proposed Spitfire Site at Land off Campden Road has not been identified as exerting any potential effects upon the settlement character (refer to para 3.2 below). Contrary to this, the SHLAA 2019 states that it's Parcel CLIF.01 / the Reserved Site in the *Draft Neighbourhood Plan* that would result in **"...impact on settlement character."**

- 2.10 The *APS Site Assessment* concludes that there is: “...**likelihood for any development to be highly prominent in the landscape...**”. This contradicts the *Draft Neighbourhood Plan*, which illustrates on Figure 7(b) the enclosed nature and very limited potential for inter-visibility with the Site.
- 2.11 APS’ formulaic approach is not helpful, particularly in the context of landscape and visual issues. Lack of appropriately qualified assessment is evident. Lack of understanding of the issues around village character also transpire with the Reserved Site in the *Draft Neighbourhood Plan* adjacent to the north eastern edge of the village of lose village grain, with dwellings set in relatively large plots. In contrast, the Site promoted by Spitfire Bespoke Homes Ltd abuts distinctly small scale village grain.
- 2.12 Furthermore, the *Draft Neighbourhood Plan* and Policy NE2 ignore the judgment of Ouseley J in *Stroud DC v SSCLG* [2015] EWHC 488 (Admin) where the judge established that for landscape to be valued it has to exhibit demonstrable physical attributes, for the purposes of paragraph 109 of the then NPPF1 (now in NPPF2 paragraph 170a). In short, the landscape has to exhibit particular attributes that take it out of the category of ordinary countryside. The Warwickshire County Council’s landscape assessment observes that undulating landform and blocks of woodland are typical for this area: “**Large scale rolling topography (...) Large woodlands often associated with rising ground.**”² In short, Martin’s Hill is part of a number of localised hills in the local area and its topography alone cannot be used as a determining factor.
- 2.13 Views of Martin’s Hill can be gained as one leaves Clifford Chambers and travels south along Public Right of Way SD52, with views of the Site interrupted and filtered by the intervening vegetation. Furthermore, the Site is not seen directly in the same angle of view or landscape context. Confusingly, views illustrated in the *Draft Neighbourhood Plan* appear to have been taken from an agricultural track that skirts the village edge. It is not taken from a PRow, the track is not identified on the OS Explorer Map 1:25,000 as ‘Other Routes with Public Access’, and is not identified in situ as a permissive path. The *Draft Neighbourhood Plan* is also silent on the nature of this location or this particular track, and does not identify it as a route of any special quality or function. To clarify, views from the

² *Warwickshire Landscapes Guidelines*, Avon Landscape Map, <https://apps.warwickshire.gov.uk/api/documents/WCCC-688-142> [accessed 06 August 2020]

adjacent allotment plots are considerably screened by canopies of mature Oak trees that line this particular track.

- 2.14 Notwithstanding this, it is important to stress that the Site falls outside of the view cone illustrated on Figure 6(a) of the *Draft Neighbourhood Plan*, thus its allocation would not affect this view. It also falls on the periphery of the view from Martin's Hill towards the village, as shown in Figure 7(b) of the *Draft Neighbourhood Plan*. The identified line of mature Oaks encloses the allotments in the village and then continues south east where it terminates on the PRoW SD52, thus away from the Site. The above mentioned Figure 7(b) is also helpful in confirming that the Site would be considerably screened by layers of intervening tree canopies. Development within the Site therefore would not interrupt, screen, or obstruct this identified view.

3. SHLAA – COMPARISON

- 3.1 The Site has been subject to the Council's SHLAA in 2012, which assessed potential development sites for their suitability, availability and deliverability and was undertaken by an independent consultant, Peter Brett Associates. The Site was identified by a blue star as a broad location for future development and was the only such location site identified in the village. Most importantly the SHLAA (2012) states with regards to the Site and Clifford Chambers: **"The principal physical constraint is the flood zone to the north east. The most potential in landscape terms is identified within zones CI03 to the south of the village."**³
- 3.2 The SHLAA (2019) is more specific and identified the area promoted by Spitfire Bespoke Homes Ltd as the only 'developable area' within SHLAA Parcels CLIF.02 and CLIF.04, out of five parcels around Clifford Chambers. Both SHLAA Parcels CLIF.02 and CLIF.04 have been assessed in the Council's SHLAA (2019) as 'Likely to be deliverable'. In comparison, the Reserve Site included in the *Draft Neighbourhood Plan*, and identified as Parcel CLIF.01, was assessed as not deliverable with poor relationship to the settlement form and not capable of being integrated into the existing built form. Potential landscape effects were also noted.
- 3.3 The most recent SHLAA (April 2020 but published July 2020) identifies Parcel CLIF.01 as 'Likely to be deliverable' with a net developable and potentially

³ SHLAA (2012), p.44.

deliverable area reflecting the extent of Reserve Site in the *Draft Neighbourhood Plan*. The text makes clear however that the maximum deliverable number would be 15 dwellings. With regards to landscape and visual issues, the most up to date SHLAA maintains the previously expressed concerns about effects upon the settlement character with this particular Parcel identified as significantly contributing to the character of Clifford Chambers.

- 3.4 In contrast, the SHLAA 2020 identifies that Site and its associated Parcels CLIF.02 and CLIF.04 are capable of delivering 30 and 12 units respectively (including associated infrastructure and landscape buffers. They have been appraised by the Council as making a moderate contribution to the village. The SHLAA map makes clear that the Site itself forms a relatively small part of the overall physical extent of Parcels CLIF.02 and CLIF.04.
- 3.5 In summary, the Reserve Site which has been identified for allocation in the *Draft Neighbourhood Plan* (Parcel CLIF.01) has been appraised in the Council's SHLAA as less suitable than the Site and the associated, and much larger Parcels CLIF.02 and CLIF.04.

4. LANDSCAPE AND VISUAL ISSUES – COMPARISON

- 4.1 The Council's adopted *Landscape Sensitivity Study* (2012) identifies the Site as forming part of a relatively large Parcel CL03 that skirts the south western edge of the village, from the B4632 towards the eastern outer edge of Clifford Manor. The interface between the village edge and adjacent fields does vary depending on the level of screening, proximity to and inter-visibility with existing built form, which create a suitable development context, as is the case with the Site and evidenced in Pegasus' *Landscape Appraisal*. This is supported by the *Study*, which states: **"Its western end is not clearly visible from the wider landscape..."**. The *Study* goes on to recognise the suitability of the Site, in landscape and visual terms: **"...development of part of the zone may be acceptable and the most suitable location for development associated with the settlement... The north western quadrant of the zone (...) is well screened and relates well to the layout of the settlement. Development of this part of the zone, (...) could be appropriate, but only if considerable care and attention were paid to fully protecting the setting of the TPOd trees.**
- 4.2 This differs from the character and visual qualities associated with the Reserve Site of the *Draft Neighbourhood Plan*, identified in the *Study* as Parcel CL01. The

Study states: **“It abuts CL04, which is the floodplain of the river Stour, and shares its pastoral character. Both serve as a foreground to the approach to the settlement from the north and as part of the main entrance to the settlement. (...) Development in the western half of the zone would be visible (although partly filtered by field boundary vegetation) when approaching the settlement from the north and entering it and is therefore considered inappropriate.”**

- 4.3 The *Study* goes on to state: **“...the zone is visible from the bridge crossing the river Stour and forms part of the foreground to views of the settlement from the north. There is some intervisibility with housing on the northern edge of the settlement.”**
- 4.4 Parcel CL01 is best described as a small scale field and, in landscape character terms, such field pattern is less suitable for housing due to increased contrast between landscape scale and built form. In other words, large scale landscape is capable of accommodating change more easily.
- 4.5 The ongoing construction, associated with dwellings along Stour Field Close, are evident as one travels along the B4362 and enters the village. At this point, the change in levels exacerbates the new built form, creating a somewhat dominant feature on the settlement edge.
- 4.6 The development of Parcel CL01 / CLIF.01 would extend the presence of built form further north along the road, which is currently perceived as a green corridor. The approach from the north is likely to include views of this new built form, affecting the current perception of the village edge. Most importantly, the development of this Parcel would bring the settlement edge closer to the nearby Clifford Mill, physically and visually closing the gap. As recognised by the aforementioned *Study*, this area forms part of the pastoral valley landscape.
- 4.7 In addition, there are a number of PRowS, which skirt the northern edge of the valley and include the promoted long distance route of Shakespeare’s Way. The pastoral landscape of northern Clifford Chambers provides a rural setting and a strong component of the visual amenity of these receptors. Development on the edge of the village, in this location, has the potential to locally compromise the rural setting to the village and the landscape character of the River Stour.

4.8 In terms of views from PRowS, a single Public Footpath crosses the northern edge of this Parcel and views would be very close range, focused on and considerably affected by any development within this location. The gentle yet detectable change in ground levels across Parcel CL01 / CLIF.01 also has the potential to unnecessarily exacerbate the height of the new built form, making it prominent in views from this particular PRow. In such views, the development would be seen separated and not integrated with the existing settlement edge, lacking any appropriate context. This observation has been consistently expressed by the Council through their SHLAA published in 2019 and updated in early 2020.

5. Summary

5.1 The proposed Spitfire Site at Land off Campden Road represents a suitable development opportunity that can be successfully integrated in landscape character and visual terms. It is respectful of the landscape features, and views in and out, and responds well to the village grain of Clifford Chambers. This analysis is supported by the Council's SHLAA. No equivalent exercise has been conducted in respect of the Neighbourhood Plan's proposed Reserve Site.