

Clifford Chambers and Milcote Neighbourhood Development Plan

Regulation 16 Representations: By Contributor

Rep.No.	Name	Policy/Section	Representation
CC 001	<i>(Resident)</i>	H1 – Growth	Must define/ quantify ‘small sites’. Should be limited to 5 houses.
		H2 – Local Housing Need	Must define/quantify ‘small sites’. Should be limited to 5 houses. Building should not be permitted beyond the BUAB unless within the allocated ‘reserve site’. Need definition of ‘affordable housing’.
		H4 – Use of garden land	Support IF garden land developments fall within the small site definition – see comments from HE1 and HE2.
		NE1 – Flood Risk and Surface Water Drainage	Support IF this section if additional focus is put on historical flooding – including photographic evidence.
		NE2 – To protect valued landscapes & skylines	Support.
		NE3 – Nature Conservation.	Support.
		NE4 – Maintaining ‘Dark Skies’	Support.
		LC1 – Designated Heritage Assets	Support.

Rep.No.	Name	Policy/Section	Representation
		LC2 – Designated Local Green Spaces.	Support.
		LC3 – Neighbourhood Area Character.	Support.
		TT3 – Highway Safety	Object. Require definition of ‘unacceptable adverse impact’ – suggest wording should be stronger and clearer.
CC 002	<i>(Resident)</i>	H1 – Housing Growth	<p>The village boundary should include the end section of the garden at no. 19, which is cut off by the currently proposed boundary. A plan is attached showing this area which xx has always used as part of the garden. Photos are also attached (<i>photos and plans attached in original representation</i>), showing that it is clearly garden land.</p> <p>Para. 4.6 of the draft NP says that “<i>Residential curtilages are included within the Village Boundary unless an area is clearly a paddock and more appropriately defined as ‘non-urban’</i>”. This area of garden land is within the residential curtilage of no. 19 and is not a paddock so should be included within the village boundary.</p>
CC 003	<i>(Coal Authority)</i>	General	Having reviewed the document, there are no specific comments to make on it.
CC 004	<i>(Windfarms)</i>	General	No comment. There are no wind farms in Clifford Chambers.
CC 005	<i>(National Grid)</i>	General	An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National grid has identified that it has no record of such assets within the Neighbourhood Plan area.
CC 006	<i>(Highways England)</i>	General	It is noted that the Neighbourhood Plan will provide between 15-20 homes during the Neighbourhood Plan period whilst up to 32 new homes could potentially be provided according to the Core Strategy. The Neighbourhood Plan will support small scale live-work development

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			<p>provided they are consistent with the Core Strategy.</p> <p>Considering the limited level of growth proposed across the Neighbourhood Plan area, it is not expected that there will be any impacts on the operation of the SRN. Therefore Highways England has no further comments to provide and trust the above is useful in the progression of the Clifford Chambers and Milcote Neighbourhood Plan.</p>
CC 007	<i>(Highways England)</i>	General	No comments to make at this time.
CC 008	<i>(Network Rail)</i>	General	Network Rail has no comments to make.
CC 009	<i>(Environment Agency)</i>	General	<p>The Neighbourhood Development Plan (NDP) should propose local policies to safeguard land at risk from fluvial flooding and the provision of sustainable management of surface water from both allocated and future windfall sites. The local policies should seek to enhance the policies in Stratford-on-Avon District Council's Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment.</p> <p>The plan area includes a number of watercourses including the River Stour and River Avon which are designated main rivers. Further to this the Marchfront Brook, designated watercourse, is within the southwest boundary. These watercourses have significant areas of floodplain associated with it, most of which is Flood Zone 3 (high probability). Any proposals that are considered during the Neighbourhood Plan process should take account of this.</p> <p>All proposals for new development must demonstrate that existing flood risk will not be increased elsewhere (downstream), ideally by managing surface water on site and limiting runoff to the greenfield rate or better. The use of sustainable drainage systems and permeable surfaces will be encouraged where appropriate. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should</p>

Rep.No.	Name	Policy/Section	Representation
		H4 – Use of Garden land	<p>include measures that mitigate and adapt to climate change.</p> <p>In line with National Planning Policy we would wish to see all new development, directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. In addition all new development, including infill development and small scale development, should incorporate sustainable drainage systems (SuDS) to reduce flood risk and manage surface water and to ensure that runoff does not increase the risk of flooding elsewhere. Planning applications for development within the NDP area must be accompanied by site-specific flood risk assessments in line with the requirements of national policy and advice. These should take account of the latest climate change allowances.</p> <p>In addition to the comments above, it is noted that the Water Framework Directive (WFD) and objectives from the Severn River Basin Management Plan have not been included as part of the evidence base within Section 5 (Natural Environment).</p> <p>The River Avon and River Stour within the NDP boundary are classified as having ‘Moderate Ecological Status or Potential’. Under the WFD there is a requirement for all waterbodies to meet ‘Good Ecological Status or Potential’ by 2027. The NDP should support the WFD to secure water quality improvements where possible and align with Stratford-on-Avon District Council’s Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk.</p> <p>It is strongly advised that the following recommendations are included in the NDP: Policy H4 – Use of Garden Land: We recommend part ‘e)’ is changed to ‘Will not increase flood risk elsewhere and where possible, reduces flood risk in line with Policy NE1’. Strategic Objective – Development should not increase flood risk.</p>

Rep.No.	Name	Policy/Section	Representation
		NE1 – Flood Risk and Surface Water Drainage:	<p>We recommend this strategic objective is expanded to include ‘reduce flood risk where possible and improve flood resilience’.</p> <p>Policy NE1 – Flood Risk and Surface Water Drainage:</p> <p>Consideration should be given to the following measures to protect and enhance the river corridor of the River Avon and River Stour and Ordinary Watercourses located in the NDP area. The existing flood risk management policy, Policy NE1 could be strengthened and should consider the inclusion of the following mitigation measures;</p> <ul style="list-style-type: none"> • Ensuring all new development is in Flood Zone 1. • Only if there is no viable/available land in Flood Zone 1 should other areas be considered using the Sequential Test approach. Please note that any watercourse which does not have any flood extents associated with them, will require further work or modelling as part of detailed planning applications to ensure the development will be safe and not increase flood risk. • All developments should create space for water by restoring floodplains and contributing towards Blue and Green Infrastructure. • Allocated sites should be highlighted and the flood risk associated with them identified. • Opportunities to reduce flood risk elsewhere by allocating flood storage areas. • Setting back development 8m from the watercourses to allow access for maintenance and restoring the natural floodplain. This includes existing culverted watercourses and flood defences. • Ensure all SuDs features are located outside of the 1 in 100 year plus climate change flood extent. • Open up culverted watercourses and remove unnecessary obstructions.

Rep.No.	Name	Policy/Section	Representation
			<p>All developments should seek to control and discharge all surface water runoff generated on site during the 1 in 100 year plus climate change rainfall event. For Greenfield development sites, the surface water runoff generated as a result of the development should not exceed the Greenfield runoff rate and if possible betterment. For Brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent Greenfield rate.</p> <p>It is recommended that the second paragraph within 'Policy NE 1 – not increase the risk of flooding elsewhere' should be expanded to include 'must demonstrate that flood risk will not be increased elsewhere and where possible, reduces flood risk and ensures the development is appropriately flood resistant and resilient.'</p> <p>It is recommended that the wording for the fourth paragraph of Policy NE1 is amended. Surface water discharge should not exceed the Greenfield runoff rate (as described above) and this does not usually require detailed hydraulic modelling to be carried out to determine the effects of this.</p> <p>It is recommended that the fifth paragraph of Policy NE1 is amended. Surface water drainage discharge should give priority to groundwater where possible to encourage groundwater recharge in the NDP area.</p> <p>The Explanation section of Policy NE1 could be strengthened to include information from Stratford-on-Avon's SFRA and evidence in relation to climate change. This is further supported by Stratford-on-Avon's emerging Climate Change Mitigation and Adaptation SPD.</p> <p>Strategic Objective – To preserve and protect habitats to ensure that wider biodiversity is protected</p> <p>It is recommended that this strategic objective is amended to include 'enhance'.</p>

Rep.No.	Name	Policy/Section	Representation
		NE3 – Nature Conservation	<p>Policy NE3 – Nature Conservation:</p> <p>Whilst support is given to the inclusion of a specific policy relating to watercourses, it is strongly recommended that this policy is strengthened. Development should not have an adverse effect on the water quality, ecological quality and structural integrity of water quality as it conflicts with the objectives of the WFD. This should include a requirement to retain and enhance river habitats and taking opportunities to improve connectivity through blue and green infrastructure.</p> <p>It is recommended that the inclusion of the following ‘In line with the objectives of the WFD, development proposals must not adversely affect the ecological status of a waterbody and wherever possible take measures to improve ecological value in order to help meet the required status.’ The evidence base for this policy could be improved to include further details on how this Policy will support WFD objectives.</p> <p>Support is given for the policy to improve access to watercourse corridors. Blue and green infrastructure could be referred to as this is key in managing and reducing flood risk. Sustainable drainage measures should always be considered for the improvement of water quality, even if it is necessary for surface water attenuation.</p> <p>It is recommended that Warwickshire County Council as the Lead Local Flood Authority (LLFA) are consulted on this Plan. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water.</p>
CC 010	<i>(Natural England)</i>	General	Natural England does not have any specific comments on this draft neighbourhood plan.

Rep.No.	Name	Policy/Section	Representation
CC 011	<i>(Warwickshire County Council Flood Risk Management)</i>	<p>NE1 – Development should not increase flood risk</p> <p>Policy NE2, Policy NE3, Policy LC2</p> <p>H1 – Local Housing Need</p> <p>H1 – 4.4</p> <p>NE1 – Flood Risk and Surface Water Drainage</p>	<p>It is recommended that there is an addition to the objective regarding new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>If a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.</p> <p>The protection of open spaces and river corridors is supported – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.</p> <p>It is recommended including an additional point that encourages new developments to open up any existing culverts on a site providing more open space/ green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.</p> <p>If a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.</p> <p>In this policy you have mentioned that the use of sustainable drainage systems and permeable surfaces will be encouraged where appropriate. This could be strengthened to say all developments will be expected to include sustainable drainage systems .</p> <p>The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored</p>

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		Figure 4a	<p>and cleaned regularly as a matter of importance.</p> <p>It is recommended using the EA Flood Map for Planning for the purposes of representing fluvial flood risk to the area. This also gives better definition to the flood risk areas. Please see the attached link - https://flood-map-for-planning.service.gov.uk/</p> <p>You may also wish to consider using the Flood Extent from Surface Water Runoff which supports your statement regarding runoff from Martins Hill. To access this please use this link and select surface water extent from the drop-down menu – https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</p>
CC 012	Bletsoes <i>(on behalf of local resident)</i>	General	<p><u>Clifford Chambers and Milcote Neighbourhood Plan – Representation to Submission Document</u></p> <p>We write on behalf of our client, the xxx , in response to your letter dated 13 January 2020 inviting representations on the draft plan.</p> <p><u>Background</u></p> <p>On 17 January 2019, we wrote to Clifford Chambers and Milcote Neighbourhood Plan Steering Group with our representation to the Pre-submission Consultation Neighbourhood Plan. This letter was followed up by an email on 17 January 2019 (timed at 16:09) requesting the names of the members of the Steering Group to allow our client to ascertain whether there were any conflicts of interest. We have <u>not</u> received a response from the steering group to either missive.</p> <p><u>The Plan Itself</u></p> <p>Within our representation to the Pre-submission Consultation Neighbourhood Plan, we highlighted concerns that it does not respond to the local needs of the village and fails to respond to National Planning Policy Guidance, which seeks to encourage villages to grow and thrive in order to enhance and maintain the vitality of rural communities. As a consequence, we felt that it did not provide enough opportunity to deliver new homes and businesses, which are both necessary for sustainable development. The submission document has not addressed our concerns. We note from previous comments Appendix 1 – Significant Comments from Stratford-</p>

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		H1 – Housing Growth	<p>on-Avon District Council that there are similar concerns in respect of page 10 paragraph 3.3.</p> <p><u>Community Engagement</u></p> <p>We also raised concerns regarding Paragraph 1.20, specifically the absence of the referenced Consultation Statement. To date, we have not been furnished with the Consultation Statement to ascertain the response rate to the consultations undertaken. Paragraph 1.19 states that <i>“the NP accurately reflects the views and aspirations of the majority of residents and consultees”</i>, which would suggest a response rate of more than 50% of parishioners. Has this been checked?</p> <p><u>Policy H1 – Housing Growth (Reserve Housing Allocation)</u></p> <p>Our concerns regarding this policy have not been addressed. In short, the allocation of a single reserve housing allocation could be perceived as putting “all eggs in one basket” in that if it transpires that this site is not deliverable (for whatever reason), there could be a housing deficit in the village. The reserve housing site strikes as somewhat detached from the village and whilst it has a few immediate neighbours it is, in our opinion, not necessarily the most suitable site. The reserve housing site itself lies within close proximity to a flood zone, which is of material consideration when you consider the three serious flooding events in 1998, 2007 and 2012. We understand that this was one of the main reasons that the residents opposed the spitfire scheme, which according to figure 4a of the Submission Document, is not located within the flood plain. We have also raised concerns regarding highways, as the current access to the reserve housing site is onto the very busy and fast paced Campden Road. From our discussions with members of the Parish Council, we understand that there are real concerns relating to the Campden Road, especially when Long Marston Airfield is developed in the very near future.</p> <p><u>Sustainability</u></p> <p>We raised concerns regarding sustainability. We do not believe the plan currently meets the three objects of sustainability as defined in the National Planning Policy Framework. The plan should identify meaningful policies that contribute to <u>building</u> a strong responsible and competitive economy. Instead, the Submission Document concentrates on maintaining the status quo and as</p>

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			<p>a tool to <u>protect</u> the village from development.</p> <p><u>Our Client's Site</u></p> <p>We have promoted our client's site off the Milcote Road which was previously looked upon favourably by members of the Neighbourhood Plan Steering Group, and we were encouraged to submit the site for consideration. However, we are interested to know the reasons behind why this opinion is now so very different and what has changed with the site to incite such a change of heart. The reasons that have been quoted to us via the specialist planning promoter Rosconn include:</p> <ul style="list-style-type: none"> • The site being on the 'wrong' side of Milcote Road • The access not being adequate • Overlooking neighbouring properties. <p>Firstly, to suggest that the site is on the 'wrong' side of the road is illogical especially when you consider the recent development of Rectory Farm, which adjoins the site.</p> <p>Secondly, in terms of access not being adequate, our client owns significant road frontage to the Campden Road and Milcote Road. In discussions with members of the Parish Council it was suggested that access onto the Campden Road was dangerous due to the quantity and speed of traffic; this reiterates our concerns in respect of the reserve housing site. Consequently, schematic plans were changed to include provisions for access off the Milcote Road; we did suggest keeping pedestrian access onto the Campden Road for better 'linkage' to the village, but members of the Parish Council were against this on grounds of safety. In short, my client's site can be accessed off either road; the same cannot be said for the reserve housing site, which only has access to the Campden Road.</p> <p>Lastly, new development will almost always affect the outlook of adjoining properties. As such, those affected will inevitably object. It is the responsibility of plan makers to put public benefit</p>

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			<p>ahead of private interests. Members of the Parish Council did raise concerns about the ridge height of the proposed development on our client's site. Consequently, the ridge heights were reduced to lessen the impact of adjoining houses. It is accepted that development will mostly affect rectory farm, however, it should be noted that recent development at Rectory Farm has already affected the property; an objection our client's development would surely be contradictory.</p> <p>We look forward to receiving confirmation that this representation has been received and properly considered. We would be grateful from a response from Clifford Chambers and Milcote Neighbourhood Plan Steering Group to our letter dated 17 January 2019 but more importantly, our email of 17 January 2019 (timed at 16.09).</p>
CC 013	<i>(The Inland Waterways Association – Warwickshire branch)</i>	<p>Policy H1 – Housing Growth.</p> <p>Policy H2 – Local Housing Need.</p> <p>Policy H3 – Live work units.</p> <p>Policy H4 – Use of Garden Land.</p> <p>Policy NE1 – Flood Risk and Surface Water Drainage.</p>	<p>Support.</p> <p>Support.</p> <p>Support.</p> <p>Support.</p> <p>Support.</p>

Rep.No.	Name	Policy/Section	Representation
		Policy NE2 – To Protect Valued Landscapes and Skylines.	Support.
		Policy NE3 – Nature Conservation.	Support.
		Policy NE4 – Maintaining ‘Dark Skies’.	Support.
		Policy LC1 – Designated Heritage Assets.	Support.
		Policy LC2 – Designated Local Green Spaces.	Support.
		Policy LC3 – Neighbourhood Area Character.	Support.
		Policy LC4 – Promoting High Speed Broadband.	Support.
		Policy TT1 – Parking.	Support.
		Policy TT2 – Walking and	Support.

Rep.No.	Name	Policy/Section	Representation
		Cycling.	
		Policy TT3 – Highway Safety.	Support.
CC 014	<i>(Resident)</i>	Policy H1 – Housing Growth.	Support.
		Policy H2 – Local Housing Need.	Support.
		Policy H3 – Live work units.	Support.
		Policy H4 – Use of Garden Land.	Support.
		Policy NE1 – Flood Risk and Surface Water Drainage.	Support.
		Policy NE2 – To Protect Valued Landscapes and Skylines.	Support.
		Policy NE3 – Nature Conservation.	Support.

Rep.No.	Name	Policy/Section	Representation
		Policy NE4 – Maintaining ‘Dark Skies’.	Support.
		Policy LC1 – Designated Heritage Assets.	Support.
		Policy LC2 – Designated Local Green Spaces.	Support.
		Policy LC3 – Neighbourhood Area Character.	Support.
		Policy LC4 – Promoting High Speed Broadband.	Support
		Policy TT1 – Parking.	Support.
		Policy TT2 – Walking and Cycling.	Support.
		Policy TT3 – Highway Safety.	Support.
CC 015	(CALA Homes)	LC2 – Designated Local Green Spaces	We oppose the identification of land at Orchard Place (site 1) as Local Green Space. We have two concerns: First, such designation would appear to conflict with the NPPF 2018, specifically

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			<p>paragraph 100 b) which requires LGS to be: "demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife" It is unclear as to the scope of assessment undertaken to support the designation beyond the brief explanatory text in the plan itself which rests on the area's provision of screening of and from the B4632 and of wildlife habitat, although it would appear that no formal ecological assessment has been undertaken. Given the area's characteristics and roadside verge location we would question its visual and ecological value, and submit that it does not meet LGS criteria as set out in the NPPF. Second, as part of our vision for Long Marston Airfield Garden Village, CALA Homes has submitted specific proposals to improve road safety on the B4632 through Clifford Chambers. These include junction improvements that require land in this location. The proposals have been worked up in conjunction with Warwickshire County Council as highway authority and land owner, and in consultation with the Parish Council. While the latter were known to have reservations, it is surprising that this designation would appear to directly contradict one of the plan's own objectives, namely to improve road safety at key access points and junctions (page 41). To conclude, we contend that the designation at Orchard Place fails to meet LGS criteria and should be deleted, and suggest that the Parish resumes discussions with WCC, SDC and CALA Homes to establish appropriate road safety improvements in this key location.</p>
CC 016	<i>(Resident)</i>	<p>H1 – Housing Growth.</p> <p>H2 – Local Housing Need.</p> <p>H4 – Use of Garden Land</p>	<p>Support.</p> <p>Support as long as not built on community or wildlife assets such as the allotments or old orchards which both are just outside the village boundary.</p> <p>Whilst villagers 'voted' for development in gardens they also valued the environment, wildlife and green spaces above almost everything else. So I think we need an additional criteria here that means that any garden development maintains or preferably enhances the environment and</p>

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			wildlife eg cutting down a mature tree and replanting a sapling is not acceptable. Disturbing bat roosts is illegal etc etc. A number of garden developments have arguably already not conformed to the existing a) to e) above and in addition have been very negative for trees and other wildlife. How do we enforce these criteria? We also need to build in incorporating wildlife into new buildings eg bat and swift bricks, opening up wildlife highways in walls and fences for hedgehogs etc etc as gardens are very important for our wildlife.
		NE1 – Flood Risk and Surface Water Drainage	Support. Surely we need to improve the drainage off Martins Hill, to prevent avoidable flooding that is already happening, before we even contemplate further building in that area?
		NE2 – To Protect Valued Landscapes and Skylines	Support.
		NE3 – Nature Conservation	Support. I support it but it is at odds to some extent with H4 development in gardens (which is why I have not supported H4). Woodland, mature trees and hedgerows and protected, rare, endangered and priority species occur in gardens as well as other locations. Some gardens are therefore totally unsuitable for development under policy NE3. The older a hedge or tree is the more valuable it is for wildlife - and old dead/dying trees are valuable for a whole new set of wildlife. A 100 year old tree or hedge cannot be replaced for 100 years. Much of our unprotected wildlife is still in decline and needs our help eg hedgehogs are a headline example. Gardens are a key place for wildlife conservation.
		NE4 – Maintaining Dark Skies	Support. Dark skies are important for people and rural character but essential for wildlife so the patterns of behaviour for, for example, nocturnal species, are not disrupted eg bats, hedgehogs. Also, should existing properties not have to apply for planning permission to install an outside light with a limit of say 60W so they don't illuminate surrounding properties?

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		LC1 – Designated Heritage Assets	Support. But we should not just protect the buildings and structures and their boundaries. The heritage assets including listed buildings (of which mine is one) also have great value in their gardens/outdoor spaces. Many have gardens and garden areas that are just as valuable as the buildings - obvious examples being the churchyard and the old vicarage. These are massively important to wildlife and also to villagers
		LC2 – Designated Green Spaces	Support. I support but it does not go far enough to protect green space as, in the original questionnaire consultation, many villagers value 'green spaces' beyond those listed above or indeed 'all green space'. So whilst this is a useful summary, it does not capture all the green space that villagers want protecting. Whilst this refers to development, it's worth noting that 'Protection' should not preclude improvement eg planting more trees.
		LC3 – Neighbourhood Area Character	Support. Needs enforcing.
		LC4 – Promoting High Speed Broadband.	Support.
		TT1 – Parking	Object. This may be in line with latest regulations but they are way behind the curve. Whilst I don't want to encourage concreting over more green space, providing 2 bed properties with one parking space is madness - only exacerbating the existing problems. Of course, discouraging car ownership would be even better. Where is the necessity for electric charging points?
		TT2 – Walking and Cycling	Support. I support this but see no evidence of it being enforced with the properties built to date. Individuals are making large profits at the cost to the community. Why are 106 monies not used

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		TT3 – Highway Safety	<p>towards improving cycling, walking routes to Stratford/Waitrose (and why are 106 monies not far larger!!). The pavement to Stratford/Waitrose is narrow and dangerous with increasingly heavy traffic the norm. We need to reduce reliance on cars (and car parking) for benefit of all.</p> <p>Support. I support this but taken literally means there will be no development unless existing properties reduce their car ownership and usage. Great!</p>
CC 017	<i>(Wild about Clifford Charity)</i>	<p>H1 – Housing Growth.</p> <p>H2 – Local Housing Need</p> <p>H4 – Use of Garden Land</p> <p>NE1 – Flood Risk and Surface Water Drainage.</p> <p>NE2 – To protect Valued Landscapes and</p>	<p>Support.</p> <p>Support as long as not built on wildlife assets such as the allotments or old orchards which both are just outside the village boundary.</p> <p>Object. We support it but it does not go far enough. Whilst villagers 'voted' for development in gardens they also valued the environment, wildlife and green spaces above almost everything else. So I think we need an additional criteria here that means that any garden development maintains or preferably enhances the environment and wildlife eg cutting down a mature tree and replanting a sapling is not acceptable. We also need to build in incorporating wildlife into new buildings eg bat and swift bricks, opening up wildlife highways in walls and fences for hedgehogs etc etc as gardens are very important for our wildlife.</p> <p>Support.</p> <p>Support.</p>

Rep.No.	Name	Policy/Section	Representation
		Skylines.	
		NE3 – Nature Conservation.	Support. We support it but it is at odds to some extent with H4 development in gardens (which is why we have not supported H4). Woodland, mature trees and hedgerows and protected, rare, endangered and priority species occur in gardens as well as other locations. Some gardens are therefore totally unsuitable for development under policy NE3. The older a hedge or tree is the more valuable it is for wildlife - and old dead/dying trees are valuable for a whole new set of wildlife. A 100 year old tree or hedge cannot be replaced for 100 years. Much of our unprotected wildlife is still in decline and needs our help eg hedgehogs are a headline example. Gardens are a key place for wildlife conservation.
		NE4 – Maintaining ‘Dark Skies’	Support. Dark skies are essential for wildlife so the patterns of behaviour for, for example, nocturnal species, are not disrupted eg bats, hedgehogs.
		LC1 – Designated Heritage Assets	Support. But we should not just protect the buildings and structures and their boundaries. The heritage assets including listed buildings also have great value in their gardens/outdoor spaces. Many have gardens and garden areas that are just as valuable as the buildings - obvious examples being the churchyard and the old vicarage. These are massively important to wildlife. For example, Warwickshire Bat Group located Lesser Horseshoe Bats roosting in the garden of the old vicarage - a bat rare locally, the nearest recorded site being Ettington.
		LC2 – Designated Green Spaces	Support. We support but it does not go far enough to protect green space as, in the original questionnaire consultation, many villagers value 'green spaces' beyond those listed above. So whilst this is a useful summary, it does not capture all the green space that villagers want protecting. Whilst this refers to development, it's worth noting that 'Protection' should not preclude improvement eg planting more trees.

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		LC3 – Neighbourhood Area Character	Support.
		LC4 – Promoting High Speed Broadband	Support.
		TT1 – Parking	Support
		TT2 – Walking and Cycling	Object.
		TT3 – Highway Safety	Support.
CC 018	<i>(Resident)</i>	H1 – Housing Growth	Support.
		H2 – Local Housing Need	Support. Perhaps to avoid confusion, the inclusion of the current definition of 'affordable' would help.
		H3 – Live Work Units	Support. I think there is a typo in the summary grid, first sentence, where the word 'comprising' has become 'compromising'.
		H4 – Use of Garden Land	Object. I believe the criteria should be extended, to include not only detriment to the character of the settlement etc which can be interpreted to mean the built heritage, but also adverse effects on the green spaces within the settlement boundary, and the biodiversity associated with it.

Rep.No.	Name	Policy/Section	Representation
		NE1 – Flood Risk and Surface Water Drainage	Object. Should obviously reference recent flooding, in 2020, in the list of flooding events. Should reference 'improvement' to existing properties, whereby large expanses of tarmac add to run off, and should therefore be discouraged in favour of permeable driveways and parking surfaces. I do not know if such improvements require permission, but to comply with the spirit of the text here, they ought to.
		NE2 – Protection of Valued Landscapes	Support. Referring to the full text, I would like to see more emphasis on the role of the oak trees in protecting the village from the prevailing winds. This is mentioned, but in passing, in a text devoted mainly to visual impact. The protection they offer from storms is considerable, which in the current climate emergency is increasingly important. While the trees are TPO, the desire of residents to prune them is expressed publicly, and indeed the Alscot Estate recently embarked on a tree management programme without the necessary permissions. The trees play a heroic functional role and I would like this to be emphasised more.
		NE3 – Nature Conservation	Object. Again, this is an important point not only for new developments but for existing houses, and I would like the point made more firmly. While hedgerows provide important habitats that help support biodiversity, the erection of solid boundaries and inappropriate fencing not only does not deliver this, it creates an impermeable barrier to the fauna with which we share our environment. The erection of urban style fencing and other solid barriers should be discouraged, or at the very least mitigated with measures to allow the free movement of hedgehogs and the like.
		NE4 - Maintaining 'Dark Skies'	Object. As above, I feel this could be emphasised to include the addition of / or replacement of lighting on current housing. Domestic lighting which also illuminates the houses opposite is simply inappropriate, and unnecessary. Please incorporate wording that empowers the Parish Council to intervene.

Rep.No.	Name	Policy/Section	Representation
		LC1 – Designated Heritage Assets	Support.
		LC2 - Designated Green Spaces	Support. Query: the text briefly mentions the grass verge, which contributes to the aesthetic of the street scene throughout the village, but this is not listed as a green space warranting special protection. While I understand that the Highways Dept have a role in this, our lovely verge is under constant pressure to be tarmacked over for parking. This happens. Can the section be expanded to incorporate better protection.
		LC3 – Neighbourhood Area Character	Support.
		LC4 – Promoting High Speed Broadband	Support.
		TT1 - Parking	Support.
		TT2 - Walking and Cycling	Object. Again, more emphasis required. While I agree with the points made, the focus is on recreational (therefore discretionary) journeys made in and around the village, not least because our lovely rural setting encourages this. However - and I will really emphasise this - WE ARE WITHIN WALKING DISTANCE OF STRATFORD TOWN CENTRE. There is no mention of functional journeys to and from Stratford, either by bicycle (often quicker than car) or on foot (30-40 minutes). Please emphasise the importance of encouraging sustainable alternatives to the car

Rep.No.	Name	Policy/Section	Representation
		TT3 - Highway Safety	<p>and maintaining the appropriate, safe, infrastructure.</p> <p>Support. It needs to be mentioned that the existing footpath / cycleway into Stratford, is in places narrower than guidelines suggest, and often in poor condition with overhanging foliage. Within the past few days, 2 lorries have left dramatic tyre marks on the path itself where it narrows to join the Waitrose roundabout, which surely could have been fatal to anyone unlucky enough to have been on the path at that time. The current path is what we got, in 2005, with the resources available at the time, and we are grateful to have it. But traffic volumes have increased considerably. I would like to see a statement in the plan supporting the provision of a safe path, for cyclists and pedestrians that connects the village to facilities at the Rosebird centre and the town of Stratford.</p>
CC 019	(Resident)	<p>H1 - Housing Growth</p> <p>H3 – Live work units</p> <p>H4 - Use of Garden Land</p> <p>NE1 - Flood Risk and Surface Water Drainage</p>	<p>Object. The Plan makes no allowances for elderly residence who have lived in Clifford Chambers for many years to stay in the community. Current smaller housing is NOT suitable for the elderly and infirm. Their only option is to sell and move elsewhere. This has happened on a number of occasions.</p> <p>Support.</p> <p>Object. The plans and the builds seen so far have not achieved the aims above.</p> <p>Support. Clifford Chambers is listed in the Domesday book. There does not seem to be any history of the village flooding. The village houses are still in the same place as they were in 1086. The only time that some of the houses have floods is the run of rainwater from Martins Hill to the south of the village. The river Stour frequently comes over its banks, sometimes 3 times a week. It has NEVER reached any house in the village, except the Water Mill. This includes the flood of</p>

Rep.No.	Name	Policy/Section	Representation
			1997 and 2008.
		NE2 – To Protect Valued Landscapes and Skylines	Support.
		NE3 – Nature Conservation.	Support.
		NE4 - Maintaining 'Dark Skies'	Support. The sky at night was ruined by Waitrose lights and the tall street lights on the roundabouts.
		LC1 - Designated Heritage Assets	Support. Archaeologist who lived in the village expressed the view that no one knew what "treasures" lay under the houses in Clifford as they had not been disturbed ever.
		LC2 - Designated Green Spaces	Support. Who decides what "Substantial Evidence" is enough to harm a green space?
		LC3 - Neighbourhood Area Character	Support. Best of luck.
		LC4 - Promoting High Speed Broadband	Support. Fibre Optics is in the village - but I believe BT is the only supplier.
		TT1 - Parking	Support. In the USA the ratio is 1.5 cars per bedroom.
CC 020	(Resident)	H1 - Housing Growth	Object. The current reserved sites elongate the village, making the village lose its present friendly feeling. We asked for some of our land behind xx-xx Clifford Chambers to be included in the BUAB

Rep.No.	Name	Policy/Section	Representation
			as we wished to build a terrace of 3/4 houses suitable for residents to downsize to. Enabling them to stay within the centre of their community as age, infirmness or accident necessitated easy to live in accommodation. To date none of the existing or recently built houses fulfil this purpose. This terrace would be within 2 mins walking distance of the village hall, recreation ground and Clifford Club where most village activities occur.
		H2 – Local Housing Need.	Support.
		H3 – Live work units.	Support.
		H4 - Use of Garden Land	So far garden infills that have been recently allowed have proved controversial. The houses built have not been suitable for downsizing and have all been very expensive. They have not fulfilled a, b or c of the above criteria
		NE1 - Flood Risk and Surface Water Drainage	Support. Contrary to belief it is not the river that causes flooding in our village and even accounting for climate change flooding has occurred due to run off from Martens Hill to the south of the village - the land owners have not maintained ditches or ponds. The drainage system has not been upgraded since it was first installed so that drainage from properties built over the last 40 years have not been catered for. Not all of the drainage is known for definite either rain water or sewerage and many outlets have been altered or blocked off as has suited without a holistic view. SDC could if they were minded to enforce land owners to maintain drainage on their land. They chose not to do so and Severn Trent have no plans to upgrade their pipe work.
		NE2 - Protection of Valued Landscapes	Support. Houses given planning recently certainly have not fulfilled this criteria.

Rep.No.	Name	Policy/Section	Representation
		NE3 – Nature Conservation.	Support.
		NE4 - Maintaining 'Dark Skies'	Support. New housing so far built have all had outside lighting which has not contributed to the dark skies wished for in the village.
		LC1 – Designated Heritage Assets.	Support.
		LC2 - Designated Green Spaces	Support. Any new large developments should have their own green space allocated.
		LC3 - Neighbourhood Area Character	Support. Again so far this has not been adhered to.
		LC4 - Promoting High Speed Broadband	Support. There is a channel down the main road that could be used for all amenities so far this has mostly been ignored. All amenities should in future be underground.
		TT1 – Parking	Support.
		TT2 - Walking and Parking	Support. It may be difficult to sustain this as outside of the village cycling, walking and horse riding is already dangerous. Footpaths and bridle paths are not being recorded for the soon to be published definitive map. Many of them are poorly maintained and are not correctly signposted.
		TT3 - Highway Safety	Support. As the village streets within the BUAB are of minimum width but suit the age of the

Rep.No.	Name	Policy/Section	Representation
			village they should not be widened or altered, off road parking would be preferable for all new builds. Already certain access roads have been over loaded by new builds.
CC 021	<i>(Resident)</i>	H1 - Housing Growth	Support. Within the Housing Section I feel it very important that the present position within the village be set out, vis-à-vis current affordable housing and almshouse provision within the village, and the brief findings, or 'need', of the 2016 Housing Needs Survey, which is referenced at para 1.16. In terms of the current position there are: 2no. 1 bed almshouses 1no. 2 bed almshouse, and 1no. 2-bed rental property, all owned and managed by Clifford Chambers Charities. The Chairman of the Trustees to the Charities confirms that the 3no. almshouses are offered at a below-market rent. In addition Warwickshire Rural Community Council (WRCC) confirm that their records show that the village has 2 x 3 bed houses and 13 x 2 bed bungalows (15no. total) all of which are either affordable rental or social rented from Orbit Housing Association. The 2016 (Village) Housing Needs Survey identified a need for 2no. houses for Housing association rental, as follows: • 1 x 2 bed house • 1 x 2 bed bungalow Plus 2 x 2bed bungalows for owner occupiers. Table 1, page 15, the no. of house completions during the plan period is now 15. Para 4.4 The village has already provided a significant number of houses quite early within the plan period. It may well have met its reasonable capacity for this plan period, given that the village has significant constraints to development by virtue of the River Stour (that floods) to the north-east of the village and significant surface water flooding to the south of the village and east of The Nashes (I will be forwarding photographic evidence by email). Home shave been flooded this Winter by virtue of surface water run-off. These factors need to be factored in when assessing the reasonable housing capacity of any village, and here, Clifford Chambers. Within the District's point-scoring assessment of settlements for settlement categorisation Clifford Chambers scores only 3, but the bus service provision would actually make it only 2. The Reserve Site should, given windfall provision and completions, only be used to meet any unmet 'local housing need' i.e. specific to the village, not district, during the Plan period. And, if that is already met the Reserve Site be rolled forward for any future housing need in the next plan period, post 2031. I support

Rep.No.	Name	Policy/Section	Representation
			the BUAB boundary shown in principle.
		H2 - Local Housing Need	Support. This is envisaged to be for small sites and provision, and likely 3-6 houses maximum.
		H3 - Live Work Units	Object. Whilst people work at home, generally in a home office, I do not believe there is a proven need for live work units and that this is a policy copied down from other plans with no real foundation. The Clifford Business Park is just beyond the village boundary and offers space for B1 or B2 uses as necessary.
		H4 - Use of Garden Land	Support. This must also mention the need to avoid harm to Heritage assets such as the designated Conservation Area and Listed Buildings, plus separately protected TPO trees.
		NE1 - Flood Risk and Surface Water Drainage	Support. But see earlier comments re: village reasonable capacity for housing in light of known and recent flood events.
		NE2 – To Protect valued landscapes and skylines.	Support.
		NE3 – Nature Conservation.	Support.
		NE4 – Maintaining ‘Dark Skies’	Support.
		LC1 – Designated	Support.

Rep.No.	Name	Policy/Section	Representation
		Heritage Assets.	
		LC2 - Designated Green Spaces	Support. Other local footpaths, formal and informal, should be added to the list.
		LC3 – Neighbourhood Character Area	Support.
		LC4 – Promoting High Speed Broadband.	Support.
		TT1 – Parking.	Support.
		TT2 – Walking and Cycling.	Support.
		TT3 – Highway Safety.	Support.
CC 022	<i>(Resident)</i>	H1 - Housing Growth	Support. Support BUAB boundary. Housing Needs Survey results should be shown in full in the text. The current position re: affordable housing in the village should be set out.
		H2 - Local Housing Need	Support. For SMALL sites (3-6 houses) to meet local need only.
		H3 - Live Work Units	Object. No identified need.
		H4 – Use of Garden Land	Support.

Rep.No.	Name	Policy/Section	Representation
		NE1 - Flood Risk and Surface Water Drainage	Support. We have a severe flood issue in the village, which reasonably hampers development potential and if ignored could put new houses at risk of flooding or move a problem to affect other existing houses.
		NE2 - Protection of Valued Landscapes	Support. More mention and a plan needed to pick up the important TPO to the south of the village which defines well the edge of the village.
		NE3 - Nature Conservation.	Support.
		NE4 - Maintaining 'Dark Skies'.	Support.
		LC1 - Designated Heritage Assets.	Support.
		LC2 - Designated Local Green Spaces.	Support.
		LC3 - Neighbourhood Area Character.	Support.
		LC4 - Promoting High Speed Broadband.	Support.
		TT1 - Parking.	Support.

Rep.No.	Name	Policy/Section	Representation
		TT2 – Walking and Cycling.	Support.
		TT3 – Highway Safety	Support.
CC 023	Stansgate	LC2: Designated Local Green Spaces	<p>Objection to 4) The allotments at rear of Main Street</p> <p><u>Statement of representations</u></p> <p>1. INTRODUCTION</p> <p>1.1 These representations relate to the Regulation 16 Consultation draft version of the Clifford Chambers and Milcote Neighbourhood Plan (the ‘draft Neighbourhood Plan’), specifically the proposal contained therein to designate the allotments at the rear of Main Street as a Local Green Space (Policy LC2). The representations are made on behalf of our client who owns the affected land. The Estate made similar representations to the Pre-Submission consultation draft of the Neighbourhood Plan.</p> <p>1.2 The proposal in the draft Neighbourhood Plan, to identify the land as a Local Green Space, seeks to rely on paragraphs 99 to 101 of the National Planning Policy Framework (February 2019). The landowners submit however that the proposed designation fails to meet the criteria set down in the NPPF, and those in the accompanying National Planning Practice Guidance. In reaching this conclusion regard has been had to the contents of the Neighbourhood Plan Survey report (2017) and the response given to the representations made to the Pre-Submission consultation draft Neighbourhood Plan.</p> <p>1.3 The Estate considers that the draft Neighbourhood Plan fails to meet the Basic Conditions as it does not pay sufficient regard to national planning policies and advice with regard to the designation of land as Local Green Space.</p> <p>2. PLANNING POLICY CONTEXT</p> <p>National Planning Policy Framework</p> <p>2.1 The National Planning Policy Framework (NPPF) states:</p>

Rep.No.	Name	Policy/Section	Representation
			<p>“99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.</p> <p>“100. The Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. <p>“101 Policies for managing development within a Local Green Space should be consistent with those of Green Belts.”</p> <p>National Planning Practice Guidance</p> <p>2.2 Further advice on the designation of Local Green Spaces is contained in the National Planning Practice Guidance (NPPG).</p> <p>2.3 Paragraph: 005 Reference ID: 37-005-20140306 states Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.</p> <p>2.4 Paragraph: 007 Reference ID: 37-007-20140306, states that the designation of any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used</p>

Rep.No.	Name	Policy/Section	Representation
			<p data-bbox="981 320 1570 352">in a way that undermines this aim of plan making.</p> <p data-bbox="882 405 2033 517">2.5 Paragraph: 009 Reference ID: 37-009-20140306, states Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.</p> <p data-bbox="882 569 2033 724">2.6 Paragraph: 011 Reference ID: 37-011-20140306 points out different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.</p> <p data-bbox="882 735 2033 932">2.7 Paragraph: 013 Reference ID: 37-013-20140306 states the green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.</p> <p data-bbox="882 943 2033 1139">2.8 Paragraph: 014 Reference ID: 37-014-20140306, notes the proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.</p> <p data-bbox="882 1192 2033 1388">2.9 Paragraph: 015 Reference ID: 37-015-20140306, makes it clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land.....blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.</p>

Rep.No.	Name	Policy/Section	Representation
			<p data-bbox="882 363 2036 560">2.10 Paragraph: 017 Reference ID: 37-017-20140306 notes some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).</p> <p data-bbox="882 612 2036 724">2.11 Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with landowners, whose legal rights must be respected.</p> <p data-bbox="882 777 1823 804">3. ASSESSMENT OF PROPOSED IDENTIFICATION AS LOCAL GREEN SPACE</p> <p data-bbox="882 820 2036 1054">3.1 The NPPF, and the NPPG state designation of a Local Green Space should only be used where the land is:</p> <ul data-bbox="981 903 2036 1054" style="list-style-type: none"> <li data-bbox="981 903 1738 930">• in reasonably close proximity to the community it serves; AND <li data-bbox="981 943 2036 1011">• demonstrably special to a local community AND holds a particular local significance; AND <li data-bbox="981 1024 1641 1051">• local in character and is not an extensive tract of land. <p data-bbox="981 1067 2036 1136">The proposed designation in the draft Neighbourhood Plan fails to meet all of these requirements, and therefore there is no justification for its inclusion in the Plan.</p> <p data-bbox="882 1152 2036 1386">3.2 The draft Neighbourhood Plan fails to demonstrate or bring forward any compelling evidence that the land should be identified as a Local Green Space, and it is evident from the responses to the Neighbourhood Plan Survey in 2017 (Question 18) that residents primarily see the designation as a way to stop development rather than because of the special and particular value and significance of the land. Indeed, the actual wording of the question, as reproduced below, is unfortunate in that it encourages this form of response,</p>

Rep.No.	Name	Policy/Section	Representation
			<p>rather than specifically asking residents which parcels of land, if any, they see as being ‘demonstrably special’ and of ‘particular local significance’ and, if any, why this is the case.</p> <p><i>Question 18 The National Planning Policy Framework states that local communities, through Local and Neighbourhood Plans, should be able to identify for special protection existing green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development, other than in very special circumstances. Which green spaces within the parish would you wish to preserve?</i></p> <p>3.3 The draft Neighbourhood Plan, and its evidence base fail to show that the land is ‘demonstrably special’ to the local community. Further, there is nothing to show why the land ‘holds a particular local significance’ to local residents. For example, there is nothing in the draft Neighbourhood Plan or its evidence base to demonstrate that the land is of especial beauty; or of historic significance; or that it is particularly important because of its tranquillity or richness of its wildlife. It is recognised that the land is used as allotments, and therefore has a degree of recreational value but that is not sufficient to meet the specific requirements set down in the NPPF and NPPG.</p> <p>3.4 In response to the representations made by the Estate in respect of the Pre-Submission version draft, the Neighbourhood Plan Steering Group (SG) comment that an independent assessment of the site has been undertaken and <i>“it clearly demonstrates that the site is entirely eligible for allocation as LGS. It is the only allotment in the neighbourhood plan and is very well used and cherished by the local community. The designation is not permanent. The NDP will be reviewed every 5 years. The SG understands that there is a rolling 3 year lease to the PC for the allotments which the PC will seek to maintain and extend.”</i></p> <p>3.5 The independent assessment of the site was undertaken by the planning consultant appointed by the Parish Council to assist with and advise on the preparation of the</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Neighbourhood Plan. The assessment forms part of the background documentation to the Neighbourhood Plan and it describes the site as a <i>“large, well maintained allotment garden. It is populated with numerous horticultural plots, garden sheds and compost bins/heaps – all of which are in active usage. It is enclosed on all sides by fencing and hedges. Mature oaks line the southern boundary and an agricultural field borders the same boundary. Residential properties border the site on the three other sides.”</i></p> <p>3.6 The assessment provides other information about the site and has a section titled ‘Ecological Significance’. The section makes generalised points about the ecological benefits of mixed hedgerows and shrubs, and of trees, and it concludes the site plays an <i>‘important contributory role in the wider ecological significance of the village.’</i> However, there is no reference to an ecological appraisal of the particular site, carried out by a qualified competent person, to support the conclusions drawn in the assessment and to demonstrate that the land itself is of especial ecological significance, or which identifies the particular ‘richness of its wildlife’. The general comments made in the assessment are not sufficient to meet the stringent tests set down in the NPPF and NPPG.</p> <p>3.7 The assessment states <i>‘the site is locally significant because it is well used and valued by the local community as the only allotment garden in the village.’</i> The assessment summarises ‘the site is well related to and used by the local community and makes a positive contribution to health and well-being of local residents.’ But access to the allotments is limited to holders, and there is no hard evidence to support the generalisations made in the assessment. As there is no general public access to the land the benefits to the wider local community’s health and well-being are not significant and the level of usage of the land does not justify designation as Local Green Space.</p> <p>3.8 The assessment comments the site <i>‘is also highly appreciated and prized by the local community as an undeveloped tranquil area of open land close to the heart of the village</i></p>

Rep.No.	Name	Policy/Section	Representation
			<p data-bbox="981 320 2036 930"><i>with views across the agricultural field and the hills beyond and which contributes to its green setting and sustainability.</i> There is no evidence to support the view that the stated attributes of the site are <i>'highly appreciated and prized by the local community'</i> and, once again, it is relevant to note the relative restricted public access to the land. Furthermore, the attributes ascribed to the land do not find mention in the Character Assessment contained at Appendix 1 of the draft Neighbourhood Plan. Indeed, there appears to be no reference to the allotments in that Character Assessment. The Character Assessment, and the main body of the Neighbourhood Plan do not show the allotment gardens as providing a valued view of the surrounding countryside landscape and skylines, nor does the site feature in the setting of the village as shown in Figures 7(b) and 7(c). As noted in the assessment of the allotments and the Character Assessment the south western edge of the village is formed by the ancient row of oak trees and hedging, and no important views over the allotments are identified. Views from the allotments of the surrounding countryside do not mean that the site is <i>'demonstrably special'</i> or of <i>'a particular local significance'</i>.</p> <p data-bbox="882 983 2036 1345">3.9 The assessment of the site claims it has <i>'special qualities'</i> which include its <i>'strong contribution to local character and distinctiveness due to its natural beauty.'</i> The Estate challenges this conclusion. Bearing in mind that points made in the preceding paragraph and the recognition in the assessment itself that the site is surrounded on three sides by residential properties it is hard to see how the site can make a strong contribution to local character and distinctiveness. Further having regard to the stated fact that the site <i>'is populated with numerous horticultural plots, garden sheds and composts bins/heaps – all of which are in active usage'</i>, the Estate cannot accept that the land has <i>'natural beauty'</i> worthy of having the additional protection which would result from LGS designation.</p> <p data-bbox="882 1358 2036 1385">3.10 It may well be that those working their allotments find it to be a tranquil environment but</p>

Rep.No.	Name	Policy/Section	Representation
			<p>that is not open to all members of the local community and once again does not demonstrate the site is particularly special or of local significance. Furthermore, the fact that the site provides the only allotments in the neighbourhood area is not justification for LGS designation.</p> <p>3.11 The SG's response to the representations made by the Estate's to the Pre-Submission draft states 'The designation is not permanent.' This comment, in itself, shows that the site cannot be demonstrably special and of a particular local significance, as it's indicates the Parish Council might be willing to delete the designation in a subsequent review of the Plan. If this is the case then the land should not be designated in the first place, and to designate the land now would be contrary to the advice given in paragraph 99 of the NPPF '<i>Local Green Space should only be designated when capable of enduring beyond the end of the plan period.</i>'</p> <p>3.12 There is no justification for designating the land as Local Green Space under the guidance in paragraphs 99 to 101 of the NPPF. Furthermore, any development proposals affecting the allotments and their setting would need to be determined in the line of the policies in the development plan and material considerations. Such policies include the following policies of the adopted Core Strategy:</p> <ul style="list-style-type: none"> • CS.5 Landscape • CS.6 Natural Environment • CS.7 Green Infrastructure • CS.8 Historic Environment • CS.9 Design and Distinctiveness • CS.15 Distribution of Development • AS.10 Countryside and Villages • CS.25 Healthy Communities

Rep.No.	Name	Policy/Section	Representation
			<p>3.13 Proposals would also need to be considered under other policies in the Neighbourhood Plan including Policy H1 which defines the village boundary; Policy NE2 – to protect valued landscapes and skylines; Policy NE3 – nature conservation; Policy NE4 – maintain ‘dark skies’; and Policy LC1 – designated heritage assets. Regard would also need to be given to material considerations such as paragraph 97 of the NPPF.</p> <p>3.14 The interplay of Core Strategy and other Neighbourhood Plan policies, as well as other material considerations means that no additional local benefit would be gained by designation of the site as Local Green Space. Designation therefore would be contrary to the advice in paragraph: 011 Reference ID: 37-011-20140306 of the NPPG and be an unnecessary and unjustified duplication of policies contrary to paragraph 16(f) of the NPPF.</p> <p>4. CONCLUSIONS</p> <p>4.1 The Regulation 16 Submission version of the Clifford Chambers and Milcote Neighbourhood Plan fails to bring forward any sound justification for the designation of the allotments to the rear of Main Street as Local Green Space as required by the NPPF and NPPG. Accordingly, in terms of the proposal to designate the land (site 4) as Local Green Space, the draft Neighbourhood Plan does not meet the basic conditions for the preparation of neighbourhood plans.</p> <p>4.2 The site should be removed as a Local Green Space designation in Policy LC2 of the draft Neighbourhood Plan and consequentially the notation (site 4) should be deleted on Figure 9.</p>
CC024	Framptons <i>(Spitfire Homes)</i>	Evidence Base	<p>2.0 EVIDENCE BASE</p> <p>2.1 The Core Strategy (adopted 2016) expressly envisaged that a later Site Allocations Plan (SAP) would need to be prepared to define Built-Up Area Boundaries and to identify Reserve Housing Sites providing flexibility to ensure that the District can meet in full its agreed housing</p>

Rep.No.	Name	Policy/Section	Representation
			<p>requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). 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. If the Council's monitoring shows that there is, or there is likely to be, an undersupply of housing or that the Council accepts that additional housing is required to be accommodated within the District by 2031.</p> <p>2.2 Given the ongoing statutory preparation of the Site Allocation Plan, the subject site has been assessed through the relevant stages, from the Strategic Housing Land Availability Assessment processes in 2012 onward. These documents have all been made public on the Council's website and we do not append them here.</p> <p>2.3 A key stage in identifying reserve sites for housing development is an up-to-date Strategic Housing Land Availability Assessment (SHLAA).</p> <p>2.4 It is also noted that as far back as 2012, the site was identified as a 'blue star' site as a broad location for further growth around the settlement, in the PBA 2012 SHLAA on behalf of the Council. No other sites were identified as a broad location for development (APP 2).</p> <p>2.5 In March 2018, a submission was prepared by Framptons, for the land at Campden Road, in response to Stratford on Avon Council's Site Allocation Plan, Regulation 18 Consultation Revised Scoping and Initial Options.</p> <p>2.6 On 15th September 2018 (APP 3), a submission was also made to draft Strategic Housing</p>

Rep.No.	Name	Policy/Section	Representation
			<p>Land Availability Assessment (SHLAA) 2018 Consultation, for the land at Campden Road, Clifford Chambers (Part of Site Ref. CLIF.02 and CLIF.04). The submission was accompanied by the following appendices:</p> <ol style="list-style-type: none"> 1. Red Line Boundary 2. Illustrative Masterplan 3. Access Plan 4. SHLAA Plan 5. Landscape Sensitivity Study Extract 6. Landscape Appraisal (we would particularly like to draw your attention to this appraisal prepared by Pegasus) <p>2.7 During this process, Site CLIF.A (East of Nashes) (which had previously been termed “CLIF.02 in the SHLAA) was taken forward at each stage, culminating in the recording of the site as a Reserve Housing site in the Site Allocations Plan (SAP). In September 2019, Stratford-on-Avon published the Regulation 19 Proposed Submission Consultation on the Site Allocations Plan. This allocated the site as a reserve site and we submitted representations to support this allocation.</p> <p>2.8 Supporting the SAP, is the 2019 SHLAA, in the SHLAA the subject site is identified as a site as ‘likely to be deliverable’ albeit only part of the site is potentially deliverable. Only Sites 2, 4 and 5A in Clifford Chambers were identified as being ‘likely to be deliverable’ all other sites were identified as ‘not deliverable’ (the site comprises part of sites 2 and 4).</p> <p>2.9 The Council has identified that the site is available, achievable and deliverable for allocation for 30-35 dwellings. It is sustainably located, capable of being integrated into existing development, and would be well contained within the landscape. All environmental and</p>

Rep.No.	Name	Policy/Section	Representation
		The Draft Neighbourhood Plan	<p>technical issues are considered capable of mitigation. Above all, the development of this site would make an important contribution to the housing requirements of the District and Clifford Chambers.</p> <p>2.10 The purpose of the consultation on the Site Allocation Plan was to permit interested parties to comment on that documentation, and in due course the document will be subject to examination. However, irrespective of any objections to the site, it is manifestly clear that the allocation of this Site follows professional, informed technical work by those acting for Spitfire and the Council's own Officers in assessing the site.</p> <p>2.11 In that immediate background, we turn to consider the text of the Draft Submission Document Neighbourhood Plan and its supporting documentation.</p> <p>3.0 THE DRAFT NEIGHBOURHOOD PLAN</p> <p>3.1 Using the headers set out in the draft Neighbourhood Plan, we set out our comments below.</p> <p>Introduction</p> <p><i>How does the Neighbourhood Plan fit into the Planning System</i></p> <p>3.2 At paragraph 1.3 reference is made to Stratford on Avon's adopted Core Strategy however, no reference is made to the emerging Site Allocations Plan (SAP) and the 2019 SHLAA (we have made previous representations on this point). At paragraphs 1.1 to 1.3 the draft Neighbourhood Plan recognises the importance of providing a policy framework with certainty, but in our view, this should situate the neighbourhood plan correctly within the emerging planning policy context. It cannot simply ignore the Site Allocations Plan.</p>

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			<p>3.3 Preferably, the Neighbourhood Plan should have regard to section 38(5) whereby later adopted plan documents take precedence over earlier documents. This is set out in established case law in respect of the term ‘out of date’ (please see APP 4). It also ignores case law in respect of the term ‘out-of-date’, notably as defined in Bloor Homes. (East Midlands) v SSCLG [2014] EWHL 754 (Admin) [45] “overtaken by things that have appeared since it was adopted”. A higher tier development plan is a prime example.</p> <p>3.4 The SAP document specifically allocates the subject site under CLIF. A as a Reserve Housing Site.</p> <p>3.5 Our headline submissions are therefore as follows:</p> <p>(1) The Draft Neighbourhood Plan does not meet the basic conditions under paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.</p> <p>(2) In particular, Draft Policy H1 seeks to circumvent the SAP by excluding from development a site now proposed for a Reserve Housing Site allocation.</p> <p>(3) The Draft Neighbourhood Plan is therefore seeking directly to frustrate the achievement of sustainable development, by impeding the delivery of strategic needs, directly contrary to the PPG Neighbourhood Planning Chapter (almost none of which have been referred to within the supporting text of the Draft Plan).</p> <p>(4) The evidence base underlying the plan and in particular Draft Policy H1 is deficient and does not meet the requirements of the Planning Practice Guidance (PPG 41-0042).</p>

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			<p>(5) There is no evidence that the Draft Neighbourhood Plan and the SAP have together been the subject of the necessary detailed discussion with the Local Planning Authority's Officers, required pursuant to paragraph 3 of Schedule 4B and PPG 41-009 and 41-040. Justification for the site identification process taken by the Neighbourhood Plan Steering Group is also required to demonstrate the comments made by officers on the 11th February 2019 have been addressed.</p> <p>(6) The Draft Neighbourhood Plan cannot lawfully or practically be submitted for examination in advance of the examination of the SAP, as it has an allocation that contradicts and effectively seeks to ignore Stratford-on-Avon District Council's detailed site assessment process. Proceeding to submission would be a serious error in respect of the neighbourhood plan process.</p> <p>(7) The authors of the Draft Neighbourhood Plan must therefore remove Policy H1 before the plan can proceed any further through preparation stages.</p> <p>8) In the present circumstances, given the centrality of the Policy H1, submission of the Neighbourhood Plan should await the completion of the statutory examination of the SAP before proceeding to a further Regulation 16 Consultation on a revised Draft Neighbourhood Plan.</p> <p><i>Meeting the Basic Conditions</i></p> <p>3.6 Paragraph 1.9 again makes no reference to the SAP and states "... <i>a Neighbourhood Plan is entitled to a different interpretation providing sufficient justification exists</i>", however no 'justification' is provided</p> <p>3.7 Paragraph 1.11 states a Basic Condition Statement will be prepared for the independent examination which demonstrates consistency between the policies in the NP and policies in Core Strategy and NPPF.</p>

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			<p>3.8 There is no attempt to do the same for the Site Allocations Plan and the basic condition table in the Basic Condition Statement, just lists Core Strategy policies – there is simply no analysis of consistency.</p> <p>Constitution</p> <p>3.9 Paragraph 1.14 refers to the tasks that the Steering Group have undertaken. Bullet point one refers to produce and review substantial evidence base from the Village, District and National Policy’, however there is no evidence base attached.</p> <p>3.10 Bullet point three refers to an interface with the officers at the Council. Again, there is no evidence base provided of this and the Steering Group has ignored the Council’s evidence base in the SHLAA and SAP; and has not addressed comments previously made by the Council officers.</p> <p>Evidence</p> <p>3.11 Paragraphs 1.15 to 1.18 refers to evidence, this includes material generated from community’s consultation but in our view, this should also include emerging development plan documentation, such as the SHLAA (2019) and older evidence such as the 2012 SHLAA and Landscape Sensitivity Study, and information submitted in representations, and the draft Site Allocations Plan.</p> <p>3.12 Inclusion of this evidence would make the Neighbourhood Plan in compliance with PPG 41-009 which makes direct reference to the need for evidence sharing in respect of the most up to-date housing information, and PP 41-040 which re-states the need for a robust evidence base.</p>

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			<p>There should be reference to the SHLAA and the Site Assessment work which has informed the SHLAA. The Neighbourhood Plan Steering Group should have regard to them in advance of publishing the present document.</p> <p>3.13 The ‘basic conditions’, against which the Examiner will assess the Neighbourhood Plan, once appointed only following a lawful Regulation 15 submission and Regulation 16 consultation are set out in paragraph 8(2) of Schedule 4B:</p> <p><i>“(2) A draft order meets the basic conditions if—</i> <i>(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</i> ... <i>(d) the making of the order contributes to the achievement of sustainable development,</i> <i>(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</i></p> <p>3.14 The basic conditions, and especially 8(2)(a) and (d), have been considered in a significant number of High Court and Court of Appeal cases in the past 3 years (as listed out in APP 4)</p> <p>3.15 In short, basic condition 8(2)(a) and (e) are tests which require considerable care on the part of Neighbourhood Plan Steering Groups and LPAs in supervising them under paragraph 3 of Schedule 4B.</p> <p>3.16 Paragraphs 1.1 to 1.3 recognise the importance of providing a policy framework with</p>

Rep.No.	Name	Policy/Section	Representation
		Policy H1 – Housing Growth	<p>certainty, but in our view needs to situate the Neighbourhood Plan correctly within the emerging planning policy context.</p> <p>3.17 At paragraphs 1.16 and 1.17 references are made to the Parish Appraisal but this document had no statutory status as it was not statutorily examined and had advisory status only, this should be recognised.</p> <p>Community Engagement</p> <p>3.18 Paragraph 1.19 – 1.22 refers to community engagement and the Consultation Statement, our substantial concerns regarding the content of this statement are set out below.</p> <p>Policy H1 Housing Growth</p> <p>3.19 The first part of H1 sets the village boundary for the site. It is submitted that the boundary takes account of land at Campden Road which we are proposing for 23 dwellings (see accompanying location plan). With regard to the principles being applied to the identification of reserve sites, land at Campden Road would not be contrary to these principles.</p> <p>3.20 Part 2 of Policy H1 identifies a Reserve Housing Allocation Site for housing on Figure 3. The site identified is the site at ‘East of Campden Road, North’ in the 2018 draft SHLAA. Notably this site is considered in the draft 2018 SHLAA a site 1 and is identified in the Council’s evidence based attached to the SHLAA as not being suitable for housing, with particular concerns identified in relation to ‘Landscape impact. Impact on settlement character.’ Notably the site in the SHLAA is located partially in flood Zone 2 and 3 as defined by the Environment Agency although the site as shown in the Neighbourhood Plan is located adjacent to this zone</p>

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			<p>but not within it.</p> <p>3.21 There is no explanation in the Neighbourhood Plan as to why the Neighbourhood Plan Reserve Allocation site has been selected. There is no analysis of the site compared to other sites for example with regards to: general site information; planning considerations such as environmental, heritage and ecology designations; and other technical consideration such as accessibility, flood risk etc. Of particular omission is that there is no assessment of the visual impact of developing this site which is on a prominent location at the north-eastern entrance to the village, this is particularly relevant as the site scores negatively in the 2019 SHLAA assessment with refers to ‘Landscape Impact. Impact on settlement character.’</p> <p>3.22 A further omission is any analysis of the flood risk analysis of the site, particularly as the site is located directly adjacent to the Zone 2 and 3 flood risk area (this is discussed further below).</p> <p>3.23 Having interrogated that Neighbourhood Plan web site there is no evidence of any comparative site analysis undertaken of the sites considered by the Neighbourhood Plan Steering Group. This was an issue raised by SDC Council Officers on 11th February 2019. There are power point presentations titled ‘Site Allocations’ for the public consultation exercise undertaken and then published minutes where the site appears to have been chosen (included in the Consultation Statement) but not via any objective analysis of the sites put forward.</p> <p>3.24 It appears that the reserve site has been chosen merely on the basis of ‘subjective popularity’ and not on the basis of any technical evidence. This is despite us raising the issue in previous representations and the council officer raising this issue of a lack of evidence base.</p> <p>3.25 We therefore respectfully request that evidence is provided by the Parish Council to confirm</p>

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			<p>that all housing sites have been comparatively assessed. We query whether the Parish Council has undertaken their own surveys at Campden Road as we have never been provided with the information. Without such evidence that there are no technical constraints for the identified reserve site or that these can be overcome, the site should be deleted.</p> <p>3.26 For the reasons as set out Spitfire's SHLAA submission (as attached), it is considered that the Spitfire site is suitable for development and should be allocated as a reserve site in the Neighbourhood Plan.</p> <p>3.27 The allocation of the Spitfire controlled land as a reserve site will:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Assist in meeting the District's housing need, including a diversity of housing stock for both market and affordable housing in the critical early part of the local plan; <input type="checkbox"/> Provide much needed affordable housing for the Parish which we be for local people which is a key need for the area; <input type="checkbox"/> Provide high quality and sustainably designed housing; <input type="checkbox"/> Assist in the vitality and viability of small businesses and services within the area; <input type="checkbox"/> Deliver new public open space on presently private land; <input type="checkbox"/> Offer a betterment to the properties at the Nashes and the village in terms of surface water run-off; <input type="checkbox"/> Potential traffic calming, if required, could be delivered via a Traffic Regulation Order, to improve speed along the B4632; and <input type="checkbox"/> Other potential benefits could be provided through s106 payments, if required, for example contributions towards education, health provision etc. <p>3.28 The allocation of the Spitfire controlled land as a reserve site will have the potential to</p>

Rep.No.	Name	Policy/Section	Representation
			<p>improve biodiversity on the site by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Enhance the biodiversity credentials of the site; <input type="checkbox"/> Retain and enhance existing vegetation on the site; <input type="checkbox"/> Using different varieties of native species for landscaping; <input type="checkbox"/> Provide green/brown roofs and wall climbers; <input type="checkbox"/> Include bird/bat boxes, amphibian kerbs, hibernacula, hedgehog homes, garden ponds; <input type="checkbox"/> Provide private outdoor spaces; <input type="checkbox"/> Creation of green buffers. <p>3.29 The allocation of the Spitfire controlled land as a reserve site will include sustainable housing design by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Providing housing at a suitable density; <input type="checkbox"/> Promoting permeability to the village centre and encouraging walking; <input type="checkbox"/> Providing a travel plan for residents to encourage modes of transport other than the car; <input type="checkbox"/> Encouraging cycling by providing cycle spaces and storage areas; <input type="checkbox"/> Provision of electric charging points; <input type="checkbox"/> Achieving BREEAM 'very good'; <input type="checkbox"/> Improving energy efficiency in buildings by: <ul style="list-style-type: none"> <input type="checkbox"/> Reducing the need for energy via efficient layout which maximises solar gains and natural ventilation; <input type="checkbox"/> Using energy more efficiently e.g. low energy lighting, well insulated buildings; <input type="checkbox"/> Using renewable energy sources - for example the use of photo voltaics, or solar water heating; <input type="checkbox"/> Mitigation of flood risk through SUDs such as raingardens, swales, etc

Rep.No.	Name	Policy/Section	Representation
		Policy NE1 – Flood Risk and Surface Water Drainage	<ul style="list-style-type: none"> <input type="checkbox"/> Employing water efficiency and rainwater harvesting; <input type="checkbox"/> Using permeable surfaces for roads, car parking areas etc. <p>3.30 Following the SHLAA submission and attachments, the following documents are also submitted which demonstrate that the site is suitable for development:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Hydrock Technical Note ‘Pre-application Flood Risk and Drainage Technical Advice Note (APP 5); and <input type="checkbox"/> BWB Technical Note Highways (APP 6). <p><i>Policy NE1 – Flood Risk and Surface Water Drainage</i></p> <p>3.31 Paragraph 5.1 and Figure 5 refer to flooding caused by run off from Martin’s Hill. Notably there is no corresponding plan, similar to that on Figure 5 which shows the extent of flooding from the River Stour which is clearly extensive (as shown on Figure 4 (b)).</p> <p>3.32 It appears that the run off plan (Figure 5) and evidence (notably from local residents only and not supported by any technical evidence) are weighted towards preventing development on the Campden Road side.</p> <p>3.33 The site is located within Flood Zone 1 as defined by the Environment Agency’s Flood Map. Flood Zone 1 is defined as a low flood risk zone with a risk of flooding less than 1 in 1000 years or 0.1%.</p> <p>3.34 The attached Hydrock Report, titled ‘Technical Advice Note Pre-Application Flood Risk and Drainage Technical Advice Note’, demonstrates that the site is at ‘low’ risk of fluvial (the River Stour), tidal and infrastructure failure flooding. However, surface water modelling confirms</p>

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			<p>that two potential overland flood flow routes exist which enter the site from the fields to the south-east and south-west.</p> <p>3.35 Historical flooding has occurred in the surrounding area which is associated with the flow route entering the site from the south-west. The source of the flows is unclear, though it is expected to be related to one, or a combination of, the following sources: surcharged flows generated from a burst highway drain; surface water run-off generated from the higher land to the south of the site and/or groundwater emergence, specifically related to the hydrogeological conditions at 'Martins Hill'. Flows would be expected to enter the ditch in the centre of the site and be directed northwards to a 450mm culvert.</p> <p>3.36 Flood mitigation measures have been modelled which remove the surface water flood risk from the site almost completely, with the site showing to be at 'very low' risk post mitigation. Measures include a shallow interception basin in the field to the south-west of the site, raising of the eastern portion of the site by 300mm and an interception swale along the south-eastern site boundary. These mitigation measures were also shown to have a minor positive effect on the surrounding area. The proposal is also to undertake further investigative work to confirm the route of the culvert.</p> <p>3.37 Other suggested mitigation measures include clearing the ditch on site, jetting of the 450mm culvert that receives flows from the ditch or upsizing the culvert if there are no blockage issues.</p> <p>3.38 The proposed Drainage Strategy is to pump foul and surface water flows, with surface water discharging to the existing site ditch and foul water discharging to the combined sewer manhole at the junction of The Nashes and Campden Road. Surface water flows will be</p>

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			<p>restricted to the pre-development QBAR rate and stored in an attenuation basin to the southwest of the site. This will provide betterment for the receiving ditch by limiting the 1 in 100 year plus climate change event to the QBAR rate, which will be an additional improvement in terms of surface water flood risk.</p> <p>3.39 In conclusion, subject to detailed design and approvals, and assuming the measures outlined within the Technical Note can be incorporated into the design and construction of the proposed development, it has been identified that the site can be satisfactorily protected from the surface water flood risk identified, and surface and foul water adequately managed and discharged, whilst ensuring that flood risk to surrounding areas is also reduced compared to the existing situation.</p> <p>3.40 As previously discussed with Members of the Parish Council, surface water run off at Campden Road is currently not attenuated. Development at the site would therefore offer a betterment to the properties at the Nashes and the wider allocation and allow for water to be captured and filtered into the drainage system delivered as part of the development proposals. Surveying of the culvert under the B4632 will be undertaken and should there need to clear it, repair it, or potentially upsize it, this will be looked at in conjunction with the Parish.</p> <p>3.41 An updated note has been prepared by Hydrock (APP 7) which provides a summary of the surface water management proposals and which demonstrates that the proposals will alleviate the current surface water issue on site by providing a safe area of surface water storage for events up to and including the extreme 1 in 100 year storm accounting for climate change. The delivery of new homes at the site would therefore improve surface water run off for the site and the local area.</p>

Rep.No.	Name	Policy/Section	Representation
		Policy NE2 – To protect valued landscapes and skylines	<p>Policy NE2 – To Protect Valued Landscapes and Skylines</p> <p>3.42 Paragraph 5.7 refers to the view of Martin’s Hill as a key landmark that has been enjoyed by parishioners for centuries. And at paragraph 5.8 it is stated that:</p> <p><i>“The view from the edge of the woods looking back towards the Village is one of the most revered landscapes of the neighbourhood area, given its elevation and panoramic attributed (see Figures 7(a) and 7 (b) above). The ancient row of oaks that run along the western boundary of the Village, masking the village from view and maintaining the valued discreet and unobtrusive view of the Village. The oaks are a distinctive feature of the vista from Martin’s Hill. As well as the aesthetic quality of the natural and prominent boundary the historical oaks also play an important practical role, by helping to reduce road noise from the B4632 and protecting the village from the prevailing winds. Many of the oaks have tree preservation order and are mature tree of more than 150 years.”</i></p> <p>3.43 Paragraph 5.9 states that <i>“these are key asset to the Village scene and underscore our history and heritage, New development should enhance or maintain the green and rural nature of these and other view to and from the Village and should not draw the eye to new development.” (emphasis added)</i></p> <p>3.44 Of note, the proposed development site area is just to the north of the line of oaks and due to the extent of Spitfire interest in the land, it would be entirely possible to enhance the line of oaks immediately to the north, adjacent to the village and to the south west boundary of the development site. This would significantly enhance and maintain the line of oaks further screening the village in the Martin’s Hill view. The site is sensitively located, but can be master planned to respect and reflect the constraints and setting of Clifford Chambers. As stated, the red line plan is part of a larger site and this allows for housing to be delivered in a sensitive way.</p>

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			<p>3.45 Furthermore, the supporting text only refers to this view and does not refer or any of the other views around the village as referred to in Appendix 1 (Character Assessment) of the Neighbourhood Plan such as views from the River Stour and its weirs and the Mill Pond, and the footpath to the north east of the village. It is considered that an omission not add and consider these other views and we have raised this issue previously.</p> <p>3.46 The supporting text contains a number of assertions as to the geographical context that are at odds with the best available professional evidence, comprised within the Landscape Statement submitted as part of Spitfire’s SHLAA submission, the Council’s Landscape Sensitivity Study (2012) and the 2019 SHLAA and the 2012 SHLAA.</p> <p>3.47 In the evidence base to the now adopted Core Strategy also included a Landscape Sensitivity Study (2012), the site is referenced as part of site CLO3 and as having ‘high/medium’ sensitivity to housing development. Of note, there are no other sites in Clifford Chambers which have ‘medium’ or ‘low’ sensitivity to housing development. The report concludes that for site CLO3: <i>“The north western quadrant of the zone [i.e. half a field] bound to north west and north east by TPO trees and to the south by a thorn hedge (albeit gappy) is well screened and relates well to the layout of the settlement. Development of this part of the zone, eastwards to the point where it abuts the Conservation Area, could be appropriate, but only if considerable care and attention were paid to fully protecting the setting of the TPOd trees to create an internal greenspace around which housing development could take place. Extension of an area south eastwards towards the PROW would not be appropriate due to its boundary with the Conservation Area, proximity to the boundary of the Registered Park and the much less dense form of settlement at this end. Extension beyond The Old Dairy would be inappropriate as within the wider open farmed</i></p>

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		Policy LC2 – Designated Local Green Spaces	<p><i>landscape and adjacent to a river valley (CL04) and Registered Park. Access to the potential site would have to be carefully considered, preferably not off the Campden Road, as this would separate the development from the village and create further impact.” [emphasis added]</i></p> <p>3.48 For the evidence base to the now adopted Core Strategy included a Strategic Housing Land Availability Assessment (SHLAA), produced in 2012, the SHLAA assessed potential development sites for their suitability, availability and deliverability and was undertaken by an independent consultant, Peter Brett Associates in 2012. The subject site is identified by a ‘blue star’ as a <i>“broad location for further growth around the settlement”</i> and is the only site in the village identified as such.</p> <p>3.49 We are concerned that there is no site analysis provided without real engagement with the evidential position. It is contended that a more robust evidence position is required. Again, this was raised by SDC Officers on 11th February 2019. Importantly, if no technical assessment of the landscape has been evidenced (LVIA) and despite professional officers raising this issue, the Neighbourhood Plan is flawed.</p> <p><i>Policy LC2 – Designated Local Green Spaces</i></p> <p>3.50 Policy LC2 designates the Spinney opposite Orchard Place as a designated area of Local Green Space. We are concerned about this designation.</p> <p>3.51 In paragraphs 99 to 100 National Planning Policy Framework (NPPF) sets out national policy on Local Green Space (emphasis added):</p>

Rep.No.	Name	Policy/Section	Representation
			<p><i>“The Local Green Space designation should only be used where the green spaces is:</i></p> <ul style="list-style-type: none"> - <i>in reasonably close proximity to the community it serves;</i> - <i>demonstrably special to a local community and holds a particular local significance, forexample because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> - <i>where the green area concerned is local in character and is not an extensive tract of land.</i> <p>3.52 A Local Green Space is a ‘restrictive and significant policy designation’ equivalent to Green Belt designation, therefore it is essential that, when allocating Local Green Space, plan-makers must clearly demonstrate that the requirements for its allocation are met in full.</p> <p>3.53 Given that the NPPF is not ambiguous in stating that a Local Green Space designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements.</p> <p>3.54 The designation would appear to conflict with the NPPF 2018, specifically paragraph 100 b) which requires LGS to be: "demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife" It is unclear as to the scope of assessment undertaken to support the designation beyond the brief explanatory text in the plan itself which rests on the area's provision of screening of and from the B4632 and of wildlife habitat, although it would appear that no formal ecological assessment has been undertaken. Given the area's characteristics and roadside verge location we would question its visual and ecological value, and submit that it does not meet LGS criteria as set out in the</p>

Rep.No.	Name	Policy/Section	Representation
			<p data-bbox="882 320 958 347">NPPF.</p> <p data-bbox="882 403 2018 683">3.55 Second, Cala Homes has submitted specific proposals to improve road safety on the B4632 through Clifford Chambers. These include junction improvements that require land in this location. The proposals have been worked up in conjunction with Warwickshire County Council as highway authority and land owner, and in consultation with the Parish Council. While the latter were known to have reservations. it is surprising that this designation would appear to directly contradict one of the plan's own objectives, namely to improve road safety at key access points and junctions (page 41).</p> <p data-bbox="882 735 2029 847">3.56 To conclude, we contend that the designation at Orchard Place fails to meet LGS criteria and should be deleted, and suggest that the Parish resumes discussions with WCC, SDC and CALA Homes to establish appropriate road safety improvements in this key location”.</p> <p data-bbox="882 900 1980 1054">3.57 In summary it is considered that the need for the community to protect the space from development by designating it as Local Green Space is not justified. The case for designation as Local Green Space in the context of the NPPF and PPG has not been sufficiently made and the potential designation should be removed.</p> <p data-bbox="882 1107 1352 1134">4.0 CONSULTATION STATEMENT</p> <p data-bbox="882 1187 2018 1378">4.1 A Consultation Statement has been submitted alongside the draft Neighbourhood Plan. The Consultation Statement has no regard to the detailed submissions made on behalf of my client, with a short paragraph stating (page 377) that the site was not allocated as it was the ‘least popular’ site as part of the community engagement exercise and compares the subject site to the Steering Groups; preferred site but there is no evidence base provided as to why</p>

Rep.No.	Name	Policy/Section	Representation
			<p>the steering groups site is preferred apart from a few subjective comments which are purely conjecture. To allocate a site based on popularity with a complete lack of evidence base is a fundamental flaw in the draft Neighbourhood Plan.</p> <p>4.2 The paragraph is also out of date as community consultation has now been undertaken on the SAP.</p> <p>5.0 CONCLUSIONS</p> <p>5.1 The proposed Neighbourhood Plan does not meet the basic conditions under paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990;</p> <p>5.2 Draft Policy H1 has been prepared in advance of the Site Allocations Document. Its further progress would not be compliant with national policy and guidance for the purposes of 8(2)(a), it would frustrate the achievement of sustainable development contrary to 8(2)(d) and it would not be in general conformity with the development plan contrary to 8(2)(e).</p> <p>5.3 There is no evidence that the Draft Plan has been the subject of the necessary detailed discussion with the Local Planning Authority's Officers, pursuant to paragraph 3 of Schedule 4B and PPG 41-009 and 41-040.</p> <p>5.4 If the Parish Council are seeking to submit the Plan for examination in advance of the adoption of the Site Allocations Document, with an allocation intended that is not underpinned by any robust evidence base, then that would be a very serious matter. It would subvert the plan preparation process in a manner directly contrary to the legislative scheme.</p>

Rep.No.	Name	Policy/Section	Representation
			<p>5.5 In summary, as a first step, the authors of the Draft Neighbourhood Plan must therefore amend draft Policy H1 before the plan can proceed any further through preparation stages.</p> <p>5.6 In the present circumstances, given the centrality of the Policy H1, submission of the Neighbourhood Plan should await the completion of the statutory examination of the Site Allocations Plan before going back to a further Regulation 14 consultation on a dramatically revised draft.</p> <p>5.7 The current Neighbourhood Plan fails to demonstrate how the proposed and discounted reserve housing sites have been properly appraised and supported by technical evidence.</p> <p>5.8 In summary, as a first step, the authors of the Draft Neighbourhood Plan we request that the Steering Group consider Spitfire’s Campden Road site as a reserve site before the plan can proceed any further through preparation stages.</p> <p>5.9 Should the site be allocated, the approach would be to meet with the Parish and key stakeholders so that the Parish and village would have a key input into the scheme. This would help ensure the highest quality of design.</p> <p>5.10 For the reasons set out above, it is considered that the site has the capacity to accommodate change and could support a residential development as part of an appropriate extension to Clifford Chambers, at a scale which is proportionate to the location’s sustainability credentials.</p> <p>5.11 It is acknowledged that the release of land would result in the encroachment of hitherto undeveloped land. Such a consequence is almost inevitable with development on greenfield land surrounding an existing settlement and the high-quality proposals have the potential of bringing significant benefits to the Parish including: provision of affordable housing; the</p>

Rep.No.	Name	Policy/Section	Representation
			<p>creation of new public open space, biodiversity improvements; flood risk improvements, traffic calming, and other s106 contributions.</p> <p>5.12 The allocation of land at Campden Road for housing will help to meet housing needs of the District and Clifford Chambers and should be allocated for housing.</p>
CC025	<i>(Canal and River Trust)</i>	General	No Comment
CC026	<i>(Severn Trent)</i>	Policy H1 – Housing Growth	<p>With specific reference to paragraph 4.4 it is noted that the NP provision for 15-20 homes under reserve site showing on Figure 3 does not align with the reserve housing sites identified in the Stratford-on-Avon District Council Site Allocations Plan Draft consultation from July 2019. This draft plan identified a further 3 reserve housing sites for Clifford Chambers CLIF.A (30-35dw), CLIF.B (12-14dw) and CLIF.C (6-7dw). As these are all identified as reserve housing sites it is therefore slightly confusing why the Neighbourhood Plan reserved housing site does not align with the Site Allocations Plan identified sites. If all sites were to come forward this would total between 63 and 76 dwellings to Clifford Chambers.</p> <p>The Site Allocation Plan reserve housing sites have been assessed through a high level desktop assessment of potential impact on the sewerage network and individually these sites have been identified as low risk providing that surface water is managed sustainably on site through Sustainable Drainage Systems SuDS. This would be the same for the reserve housing site identified in the Neighbourhood Plan, which would have potential to discharge surface water to the nearby watercourse if infiltration is not feasible. However, if all 4 reserve housing sites were to come forward it is possible that capacity issues could arise and as such it would be recommended that hydraulic modelling be undertaken to understand the impact to the network. It would therefore be beneficial to understand in advance if and when these reserve housing sites are due to be built so that our plans can be developed.</p>

Rep.No.	Name	Policy/Section	Representation
		Policy H4 – Use of Garden Land	Severn Trent is supportive of this policy in particular section e) ‘Do not exacerbate the risk of flooding’. We would mention that the building over of garden areas can contribute to urban creep and the overall loss of permeable area which may lead to incremental increases of surface water connections into the sewer network. We therefore encourage developers to ensure that surface water is managed sustainably on these sites through use of SuDS.
		Policy NE1 – Flood Risk and Surface Water Drainage	Severn Trent is supportive of this policy as a whole particularly comments on water efficiency. We are also supportive of promotion of SuDS however would suggest rewording the policy so that it is more of a requirement than an option. In addition we are supportive of wording included in support of this policy in paragraphs 5.3 and 5.4.
		Policy NE3 – Nature Conservation	Severn Trent is supportive of this policy as a whole, in particular the protection of trees and hedgerows and retention of natural features and functions of watercourses.
CC 027	Stratford District Council	General comments	<p>The latest version of the NDP does not appear to have taken into account:</p> <p>(1) This Authority’s emerging Site Allocations Plan (“The SAP”). https://www.stratford.gov.uk/planning-building/site-allocations-plan.cfm</p> <p>(2) Relevant guidance in part S of this Authority’s Development Requirements Supplementary Planning Document (“the SPD”) (adopted 15 April 2019). https://www.stratford.gov.uk/planning-building/development-requirements-spd.cfm</p> <p>There are also concerns over some detailed technical concerns around the wording of Policy H2. More specifically, and to summarise the original concerns:</p>

Rep.No.	Name	Policy/Section	Representation
			<p>(1) Policy H1. Part 2 of this policy identifies what is described as a 'reserved housing site'. Its release will only be countenanced if there is an 'identified local housing need' justifying its release. This appears to be at odds with the remit for 'reserve sites' set out in Core Strategy policy CS.16. There is, in any case, already an 'identified local housing need'.</p> <p>(2) Paragraph 4.9. Although only explanatory text, it refers to local occupancy control arrangements that differ in detail from those normally applied to 'Local Need' schemes of this nature. Whilst it would be preferable for local occupancy control arrangements to align with those set out in the SPD, the main concern is that unless there is provision for a 'cascade' mechanism, no housing association (Registered Provider) would be willing to develop a scheme.</p> <p>It is noted that since the pre-submission draft of the plan was published, the submission draft of the SAP has also been published. Amongst other things, the SAP identifies three sites on the edge of Clifford Chambers village as reserve sites.</p>
		Page 1, contents.	Amend Policy title for LC2 to read "Designated Local Green Spaces".
		Page 1, contents.	Amend Policy title for LC3 to read "Neighbourhood Design Principles".
		Page 2, list of figures.	Amend 6 (a) to read "Valued Landscape view to Martin's Hill".
		Page 3, Background.	Insert 'Development' between 'Neighbourhood' and 'Plan' in the first sentence of the opening paragraph.
		Page 5, Para 1.6.	Suggest inserting 'vote' after 'majority'.
		P 8. Para.1.26.	It will be necessary to consider reviewing the NDP before 2029 as when SDC's Core Strategy

Rep.No.	Name	Policy/Section	Representation
			Review has been adopted the current NDP is likely to be out-of-date at that point in time.
		P 10. Para 3.3.	Given that the NDP does not take the opportunity to allocate sites for housing, other than relying on possible windfall development throughout the Plan period and supporting a 'local needs' scheme should the evidence support such a proposal, it is unclear how the policies in the Plan will achieve the strategy of providing a wider range of affordable and smaller properties.
		P 10. Para 3.3. Section 3 – strategy.	The paragraph states that the NDP ' <i>will enable residents to live the whole of their lives in the village</i> '. It is not clear how this will be achieved, with the policies that are included within the plan. This needs to be expanded upon.
		P 10. Para 3.4. Bullet Point 6.	Windfall development will not necessarily be undertaken to 'satisfy demonstrable village housing needs', as suggested. Additionally, the Reserve Housing site in the NDP would be released to satisfy one of the 4 purposes set out in Policy CS.16D of the Core Strategy which would equate to District (or wider) need, not local housing need.
		P 11. 1 st Objective.	The Plan does not allocate sites or have an associated policy relating to the control of development via regular dispersal therefore the NDP cannot comply with this objective.
		P 11. Objectives.	The plan does not appear to include objectives to encourage sustainable travel patterns and encourage retention of local facilities, as there are so few of them in the Parish.
		P.11. Policy H2.	Refers to sites "within the confines of the existing settlement boundary". However, this is not what the policy is about. Policy H2 on p.18 of the NDP refers to affordable housing on sites "beyond but reasonably close to the village boundary".
		P.12. Sixth objective.	Amend objective to read "To protect valued landscapes".

Rep.No.	Name	Policy/Section	Representation
		P.12. Policy NE2.	Remove “skylines” from final line in the policy and also in the Objective.
		P.12. Eighth objective.	Replace “strongly moderate” with “minimise”.
		P.13. Fourteenth objective.	Replace “prioritised” with “incorporated” to match the policy on p.40 of the plan.
		P14. Policy H1. Para 4.4.	To meet the provisions of Core Strategy Policy CS.16 a reserve site needs to be available to meet the purposes specified in Part D of that policy. If the NDP is proposing to identify reserve site for local housing needs only then it will still be necessary for SDC to consider identifying reserve sites for District-wide purposes at Clifford Chambers.
		P14. Policy H1. Housing Growth.	Part 2 of this Policy identifies what is described as a ‘reserved housing site’. Its release will only be countenanced if there is an ‘identified local housing need’ justifying its release. This appears to be at odds with the remit for ‘reserve sites’ set out in Core Strategy Policy CS.16. There is, in any case, already an ‘identified local housing need’. This appears to be at odds with the remit for ‘reserve sites’ set out in the Core Strategy.
		P 14. Para 4.1. Policy H1.	The first sentence does not accurately reflect Policy CS.16 of the Core Strategy. It is suggested it should be amended to read “where up to <u>approximately 32 new homes</u> ”.
		P.14. Strategic Objective.	The plan does not allocate sites or have an associated policy relating to the control of development via regular dispersal therefore the NDP cannot comply with this objective. There does not appear to be a link between the objective and the associated policy.
		P 14 – 19. Policy H1 and	The proposed ‘reserved site’ (H1-2) has been coded red (i.e. ‘not deliverable’) as part of the SHLAA

Rep.No.	Name	Policy/Section	Representation
		Policy H2.	<p>assessment process; whereas the three SAP reserve sites have been coded amber (i.e. 'likely to be deliverable') for the purposes of the Strategic Housing Land Availability Assessment ("the SHLAA").</p> <p>Whilst it is open to any neighbourhood plan to promote alternative reserve sites to those proposed in the SAP, there is concern that there is no reasoned explanation as to why a specific alternative site has been proposed, given the findings of the SHLAA, in the Plan itself.</p> <p>There is also concern about the wording of paragraph 4.4 in the Plan. It indicates that the Plan 'provides' for between 15-20 homes to be built during the plan period. How this 'provision' is to be made is unclear, since Policy H1-2 makes no reference to overall capacity of the site and only countenances its release where there is evidence of an 'identified local housing need'. As previously noted, evidence of an unmet local housing need <i>already</i> exists (albeit only for a total of three additional homes, comprising two for housing association rent and one for owner-occupation).</p> <p>The Parish Council has submitted representations on the soundness of the pre-submission SAP, but those representations must be considered separately. It is noted that those representations include (at Appendices 2, 3 and 4 respectively) copies of the Site Assessments (dated September 2017) prepared for the plan (as opposed to the SAP). Nevertheless, it would have been useful if the plan itself could have, as a minimum, summarised why the proposed site (H1-2) has been identified as an alternative to the three sites identified in the SAP and why that site is only identified as a 'reserve housing allocation' rather than an explicit allocation (having regard to the role of Clifford Chambers as a Category 4 Local Service Village). The above issues do not have significant implications for the delivery of affordable housing.</p> <p>The issues arising from the SAP process must necessarily be considered separately. It is difficult to see how the apparent role of the Policy H1-2 site catering for an 'identified local housing need' <i>only</i> properly reflects the role of the village envisaged in Core Strategy Policy CS.16: which is to contribute towards meeting District-wide housing needs as opposed to purely local needs.</p>

Rep.No.	Name	Policy/Section	Representation
		<p>P14. Policy H1 (part 1).</p> <p>P14. Policy H1 (part 2).</p>	<p>The Parish Council’s Site Assessment suggests a capacity of 25 dwellings (based on an assumed density of 25 dwellings per hectare). In contrast paragraph 4.4 of the plan implies provision of 15-20 homes during the plan period, although this is not expressed as a specific policy requirement. However, even the latter figure is significantly in excess of the level of local need identified in the 2016 Housing Needs Survey.</p> <p>Taking the lower of the two site capacity figures mentioned above would, on the basis of the current Core Strategy requirement for 35% affordable housing provision, give an indicative affordable housing yield of between 5 and 7 affordable homes. With an appropriate stock and tenure specification, such a yield could easily accommodate the locally identified need whilst contributing towards meeting wider District – level needs.</p> <p>In contrast, whilst it is theoretically possible to envisage a partial release of the site to cater only for the current identified local need for three homes, this will simply not be tenable in practice. For example, supporting infrastructure (in particular, highway access and utilities) will require sizing for longer term development on the remainder of the site and this will represent a significant up-front cost.</p> <p>Given the above, it would be preferable to modify Policy H1-2 to make it a straightforward housing allocation, available for immediate release. Apart from achieving a better alignment with strategic housing requirements, it would also provide a much more credible mechanism for meeting currently identified local housing need.</p> <p>Paragraph 2 of the policy needs to ensure it complies with Core Strategy Policy AS.10 in terms of housing development allowed outside settlements. The final sentence of paragraph 2 has been added since the Reg.14 version of the plan. The sentence is a statement, not policy, and should be removed.</p> <p>The heading is confusing in that it uses the words ‘Reserve and ‘Allocation’ which in terms of</p>

Rep.No.	Name	Policy/Section	Representation
		<p>P14. Para 4.1.</p> <p>P16. Figure 2.</p>	<p>promoting sites for housing, have very different meanings. The policy identifies a 'Reserve Housing Allocation' on land immediately to the north of the village, fronting Campden Road. Its status as a 'reserve site' is queried, since the policy states it has been identified for 'potential future suitable small-scale housing' which is more akin to a housing allocation for 'organic growth' during the plan period, as set out in the explanatory text to the policy. Additionally, its release is conditional upon their being an 'identified local need'. This appears to be conflating two issues. The policy as drafted at odds with the four reasons for releasing 'Reserve Sites' set out in Core Strategy Policy CS.16D – one of which is to rectify any shortfall in housing delivery on a District-wide basis. This is especially significant as there is already an identified local housing need, referenced in the Plan, and which it is desirable to meet. As drafted, the policy is not in general conformity with the Core Strategy and therefore fails to meet the Basic Conditions test. Finally, the policy should identify the approximate number of dwellings to be provided on the site.</p> <p>The first sentence does not accurately reflect Policy CS.16 of the Core Strategy. As written, it suggests the village has a target of houses to reach. This is incorrect. It is recommended that 'up to' is replaced with 'approximately' in order to comply with the Core Strategy.</p> <p>It is noted that there are differences between the BUAB set out in the NDP and the BUAB within the Site Allocations Plan. The main difference being the inclusion of proposed LGS site 1 plus dwellings at Rectory Farm between Campden Road and Milcote Road in the NDP version. The District Council does not raise objection to the Parish Council having a difference of approach, as long as the evidence and justification for including these additional parcels of land is clear and meets the Basic Conditions test. If the Campden Road is not deemed to be a feature that would cause physical separation sufficient to warrant the exclusion of dwellings to the west of the road, there appears to be some inconsistency in not also including the dwellings to the south of Rectory Farm.</p>

Rep.No.	Name	Policy/Section	Representation
		P 17. Para 4.4. Section 4 – Housing.	The basis of reserve sites is not consistent with Policy CS.16.D. What is proposed is an allocation with its release restricted to when a local need is identified. It is not appropriate to restrict allocations to a local need as it is necessary for housing development to meet all aspects of the District’s housing requirements.
		P.17. Para 4.4.	The first sentence states the NDP ‘provides for between 15-20 homes to be built during the NDP period’. This is an incorrect statement in that the one site in the plan is seemingly being promoted as a Reserve Site and as such may not need to be released during the plan period of there is no identified need. If the site is being promoted to bring forward development for ‘modest organic growth’ (as stated later on in paragraph 4.4) then the site should be earmarked as an allocation, not a reserve site. Whilst it is acknowledged that this version of the NDP has raised the potential quantum of development from 15 dwellings (at Reg.14) to 15-20 dwellings, there is concern that this is a very low density for a greenfield site that is not constrained. It does not seem to be making the best use or most sustainable use of land as promoted by the NPPF. Would this meet the Basic Conditions test?
		P.18/19. Policy H2 and paragraph 4.9.	Policy H2 refers to only ‘affordable housing development’ being permitted where an unmet local housing need is identified. It therefore lacks the flexibility provided in Core Strategy policies CS.15 (G) and AS.10 (a) to cater for any identified need for local market housing, and there is an inherent inconsistency with paragraph 4.8. Not only would this policy not be able to deliver a scheme which fully meets the currently identified local need (which includes a need for one local market dwelling), it is difficult to identify any ‘added value’ generated by this policy, bearing in mind the development that could <i>already</i> be brought forward under the above Core Strategy policies. Therefore, unless there are specific issues local that require a ‘bespoke’ policy it may be better to

Rep.No.	Name	Policy/Section	Representation
		<p>P.18. Policy H2. Strategic Objective</p> <p>P19. Para 4.9.</p>	<p>omit Policy H2 altogether and simply rely on the current Core Strategy policies to provide a framework for considering any 'Local Need' proposals.</p> <p>If, notwithstanding the above issues, Policy H2 is to be retained, it is recommended:</p> <ol style="list-style-type: none"> (1) Deletion of reference to "Affordable housing development..." and replacement with "small-scale community led schemes..." to ensure better alignment with Core Strategy policies and provide scope to meet local market housing needs as well. (2) A change to the wording of the policy by deleting reference to 'land owners' and substituting reference to 'promoters'. (3) Deleting paragraph 4.9 in its entirety, and its replacement with the following: <p>"Policy H2 includes a requirement for any scheme to include provision for secure arrangements to ensure the housing will remain affordable and available to meet the continuing needs of local people. Applicants will therefore be required to enter into a planning obligation (S106 Agreement) prior to the grant of planning permission including provisions that ensure priority is given to the letting or sale of properties to people with a local connection to Clifford Chambers and Milcote Parish. It is expected that the detailed arrangements described in Part S of the District Council's 'Development Requirements' Supplementary Planning Document (or any subsequent amendment thereto) will be implemented".</p> <p>It should be noted that Policy H2 would be unworkable in practice without the above change.</p> <p>Replace 'permitted' with 'supported' in the first paragraph, for consistency of language throughout the plan. It is questioned whether the policy fits the objective, or delivers on it, as it only refers to affordable housing and does not cover 'various stages' of people's lives per se.</p> <p>Although only explanatory text, it refers to local occupancy control arrangements that differ in detail from those normally applied to 'Local Need' schemes of this nature. Whilst it would be</p>

Rep.No.	Name	Policy/Section	Representation
			preferable for local occupancy control arrangements to align with those set out in the SPD, there is a concern that unless there is provision for a 'cascade' mechanism, no housing association (Registered Provider) would be willing to develop a scheme. In addition, it is noted that since the pre-submission draft of the Plan was published, the submission draft of the SAP has also been published. Amongst other things, the SAP identifies three sites on the edge of Clifford Chambers's village as reserve sites.
		P 20. Policy H3.	It is important to make it clear that the location of a new build live-work dwelling should be that the location of a live-work dwelling must be consistent with the control of housing development established in policies CS.15 and AS.10.
		P 21. Policy H4.	Replace 'permitted' with 'supported' in the first paragraph, for consistency of language throughout the plan.
		P 22. Policy NE1.	Propose adding "(SUDS)" after "systems" in fourth paragraph.
		P 25. Strategic Objective.	The associated policy does not look to protect 'important landmarks'. Therefore, it is suggested that the objective is amended to read "To protect valued landscapes".
		P 25. Policy NE2.	Suggest the policy heading should be amended to read "Protection of Valued Landscapes" to comply with the associated policy content. On a more fundamental note, it is suggested that the policy relates more to the protection of views than landscapes.
		P 29. Policy NE3.	Has any evidence been collected to support this policy regarding local habitats and those which would need to be protected?
		P 29. Policy NE3.	Additional text has been inserted into the second paragraph of this policy relating to 'habitat

Rep.No.	Name	Policy/Section	Representation
			<p>buffers' being established in "areas peripheral to a sensitive site which is landscaped or managed". It is not clear what is meant by a 'sensitive site' and how an applicant (or indeed the Local Planning Authority) would know how to determine a planning application on this basis. The final paragraph of the policy asks for "replacement trees/and or hedgerows to be of an equivalent or better standard" than those to be lost to development. It is not clear how this could be complied with, particularly in relation to the replacement of mature trees?</p>
		P29. Policy NE3. Nature Conservation.	<p>Policy NE3 Nature Conservation states that development should protect and where possible, enhance, the natural environment including natural features, boundaries and areas of biodiversity. Development will not be supported that will adversely effect, inter alai 1. Woodland and copses and 2) Mature trees and hedgerows.</p> <p>This policy could again potentially impact on the proposed works at the junction of Campden Road, Clifford Chambers and Milcote Road by preventing the removal of the trees/vegetation that would be required for any such extensive highway improvements to be undertaken.</p>
		P 30. Policy NE4. Second paragraph.	<p>It is considered that the term "must" may be too strong in relation to all development proposals. It is suggested a more appropriate alternative term would be "should".</p>
		P30. Strategic Objective.	<p>Consider amending the objective to read "To minimise light pollution and retain 'dark skies'".</p>
		P30. Policy NE4.	<p>There are concerns as to whether the NDP has any jurisdiction over the issues of property and street lighting, as referred to in the first paragraph of the policy. The majority of domestic lighting would not be controlled through planning legislation and street lighting is the responsible of Warwickshire County Council as the Highway Authority and as such they would be able to carry out lighting schemes outside the planning process under relevant regulations.</p>
		P30. Policy NE4.	<p>Policy NE4 Maintaining 'Dark Skies' states that development should aim to minimise light</p>

Rep.No.	Name	Policy/Section	Representation
		Maintaining 'Dark Skies'.	<p>pollution by avoiding obtrusive external property and street lighting. The explanation in paragraph 5.14 makes reference to the fact that all new developments should adopt an environmentally sustainable approach, supporting a dark skies environment with no street lighting and responsible Passive Infrared Sensor (PIR) based external property lighting.</p> <p>This policy could potentially impact at the junction of Campden Road, Clifford Chambers and Milcote Road by preventing the use of street lighting which would almost certainly be required for any such extensive highway improvements.</p>
		P31. Para 5.14.	Reference is made to 'PIR based external property lighting' but there is no explanation as to what this is or why it would be deemed appropriate. This needs to be expanded upon.
		P31. Para 5.15.	2 nd line. Suggest replace 'required' with 'expected'.
		P33. Para 6.2.	There is a concern that the explanatory text does not explain the balancing principle of 'public benefits' as set out in the NPPF. Wording "including boundaries and outbuildings" has been added to the second sentence when referring to listed buildings. Outbuildings and boundary walls would be curtilage listed in these circumstances and would enjoy the protection of the listing of the host dwelling. Should this relate to the 'setting' of listed buildings instead?
		P34. Policy LC2.	The first Local Green Space is likely to be affected by a new junction scheme associated with implementing the LMA proposal within the Core Strategy. In this respect it should be considered that such a road scheme is in the public benefit because it is necessary to deliver a major component of the adopted Development Plan. In 2 nd paragraph, 2 nd line – 'permitted' should be replaced with 'supported' as the Parish Council is not the determining authority.
		P 34. Policy LC2.	Replace 'permitted' with 'supported' in the final paragraph, for consistency of language

Rep.No.	Name	Policy/Section	Representation
		<p>P34. Policy LC2. Designated Local Green Spaces</p>	<p>throughout the plan. There are concerns over the inclusion of site 1 (Spinney) as a LGS as it does not appear to meet test b) of para 100 of the NPPF (2019) in that the site in question does not hold any particular significance for the local community (it is an 'island' of scrub created when highway junction and road alignment alterations were carried out to the Campden Road sometime in the past); it is not a site renowned for its 'beauty'; it does not hold any historic significance; it has no recreational value and could not be described as 'tranquil' given its juxtaposition with the Campden Road. From the evidence submitted with the plan, there is little evidence to confirm the site is 'rich in wildlife'. Therefore, it is considered that this is brought to the Examiner's attention as to the potential prospect of road improvements associated with LMA which would lead to the destruction of this area of scrub. The area of main concern is that, should this site be allocated as a LGS, this could scupper the road improvements and potentially put the wider objectives of the Core Strategy at risk in terms of housing delivery.</p> <p>Policy LC2 proposes to designate 5 areas of Local Green Space. Two of these areas of Local Green Space are the Spinney opposite Orchard Place and the Village Pound at Milcote Lane. The explanation in paragraph 6.4 makes reference to the fact that the spinney opposite Orchard Place provides significant screening from noise and pollution from the B4632 along with the habitat for birds, insects and wild flowers.</p> <p>The District Council is currently in the process of evaluating two major planning applications of strategic importance:</p> <p>18/01892/OUT – Long Marston Garden Village – Outline application for 3100 dwellings, commercial and employment land and all associated works.</p> <p>18/01883/FUL – Construction of a South Western Relief Road</p> <p>As part of the application for Long Marston Garden Village a large amount of highways modelling has been undertaken. This has shown that a significant amount of off-site highway works need to</p>

Rep.No.	Name	Policy/Section	Representation
			<p>be undertaken in order to accommodate the growth in traffic in the form of junction improvements. One of the junctions identified as requiring improvements is at the junction of Campden Road, Clifford Chambers and Milcote Road which would impact on the two areas of Local Green Space detailed above. A plan is attached to these comments (Junction work) showing the proposed highway works which show the implementation of a double roundabout. This plan is in the public domain having been submitted in respect of the Long Marston Garden Village outline application.</p> <p>Proposed Policy LC2 has the potential to prevent the implementation of these off-site highway works which could have implications in respect of the ability to implement application 18/01892/OUT should this be granted outline permission. The wording of the policy is very restrictive in the fact that it states that development would harm the character and intended use or purpose of Local Green Space or its significance and value to the local community will not be permitted unless there is substantial evidence to prove that the public benefit would outweigh the harm to the Local Green Space.</p>
		P36. Policy LC3.	<p>Would it be more accurate to amend the policy title to read “Neighbourhood Design Principles” in order to reflect the policy content. Criterion i) relates to street and other lighting and the same issues apply as set out here in respect of Policy NE4.</p>
		P36. Policy LC3.	<p>Paragraph 6.9 states that the design principles outlined in Policy LC3 “should be addressed”. However, this section provides no evidence or explanation to confirm why these criteria (in particular) are required.</p>
		P39. Policy TT1.	<p>Suggest amending the wording of paragraph 2 to read “Residential development must provide off-road parking spaces”. The paragraph as drafted states that garage spaces would be included as a parking space. However, part O of adopted Development Requirements SPD (Parking and</p>

Rep.No.	Name	Policy/Section	Representation
		P41. Policy TT3. Highway Safety.	<p>to tackle issues of potential congestion etc. However, the policy does not take account of documents in the public domain relating to associated road improvements close to Clifford Chambers which could impact on the long-term existence of the site earmarked as Local Green Space 1. Should the second paragraph of the policy read “increase congestion within the village” rather than Neighbourhood Area’ given the final part of the sentence refers to a particular area of the village? As the policy is currently drafted, any development will increase congestion within the neighbourhood area and as such, policies H1 and H2 could not be implemented. Suggest amending the first sentence of paragraph 4 to read “Development proposals that have the potential to generate significant amounts of vehicle trips”</p> <p>Policy TT3 states that new development should not result in inappropriate traffic generation or have an unacceptable adverse impact on road safety. The explanation at paragraph 7.5 states that it is broadly accepted that current or imminent development (Meon Vale and Long Marston Garden Village) in adjoining and surrounding areas will significantly increase traffic volumes along the B4632, the main access road to the majority of local roads and residences in the area. Existing concerns are also raised about road safety with particular emphasis at key intersections along the B4632 when leaving the village or accessing the village from The Nashes, the New Inn or when leaving/joining Milcote Road at its junction with the B4632, either by car or on foot. Paragraph 7.7.states that significant emphasis must be placed on maintaining or improving road safety at intersections along the B4632 (within the Neighbourhood Area).</p> <p>To this effect the policies previously detailed above seem to contradict the aspirations of Policy TT3 by effectively restricting the ability to undertake any significant highway improvements that would be required as a result of development either within the Neighbourhood Plan area or along the Campden Road corridor (such as Long Marston Garden Village).</p> <p>Overall, there is great concern that the proposed policies in the Clifford Chambers & Milcote Neighbourhood Plan 2011-2031 could prevent the ability to undertake the required off-site</p>

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		P42. Para 7.7.	<p>highway works put forward in respect of the Long Marston Garden Village which is of strategic importance to the District Council and an allocated site in the Core Strategy.</p> <p>Whilst the District Council agrees with this statement, any potential highway/safety improvement for the village might be severely compromised through the designation of LGS1.</p>