

**Representations of the
CLIFTON IMPROVEMENT AND PRESERVATION SOCIETY
Housing Site, Clifton HA16**

General

1. The site allocation strategy in the proposed “Site allocations” of the LDF is required to conform with the Core Strategy and Development Policies of November 2009. In relation to the 400 housing units apportioned by the latter Plans to the rural areas, the Adopted Core Strategy Document general approach and policies needs to be applied. In paragraph 2.2.2 there is the challenge to reduce the district’s contribution to climate change. Strategic Objective 4 (iii) is to provide only “limited development” outside the Major and Minor Centres. Objective 8 states that “Provision made will reflect closely local needs” and refers (inter alia) to Policy CS8. On page 22 of the Core Strategy where the approach to development is set out, the framework recites that the approach, after supporting the concentration of future development on major and minor centres, is “To allow more limited new development in the rural areas to serve local needs and help support local services”. Having established a Settlement Hierarchy, in relation to the Rural Areas, the Policy CSI relates that “The Site Allocations DPD will make small-scale allocations of new homes, jobs and amenity facilities that reflect the size and character of the community”. On page 71 of the Core Strategy the figure of 400 is ascribed to the Rural Area in the tables as part of the number needed in order to meet the Objective of 17950 dwellings provided from 2001-2026. In arriving at the total requirement it must be remembered that under Policy CS8 up to 10 dwellings could be built in every village listed in Policy CS1, a possible total of 390, outside “Settlement Areas” for local needs. If this were done outside areas in the Proposed Allocations proposed, the total provision would be exceeded. The allocations when examined by reference to the Technical Report document amount to 417 dwellings on the basis of developments submitted by those who support the sites.
2. The foregoing analysis of the Core Strategy Document demonstrates that the Settlement Allocations Policy is not in conformity with the Core Strategy. There is no reduction in the land apportioned for future development shown in the new Settlement Plans for the possible growth attributable to the exceptions likely to arise from Policy CS8. At the maximum of 390 the new dwellings in the Rural Areas could mount to 800 or thereabouts. Such a policy of dispersal would be inconsistent with the objectives of the framework strategy for sustainable development and to meet the needs of climate change. There should be an allowance for the number of CS8 dwellings, arising over the next fifteen years when Government Policy could revert to supporting public promoted housing, in the Settlement Allocations made. A reduction of a figure of 50% of the defined allocations should be made at this point to allow for Policy CS8. That can be monitored over the period in accordance with paragraph 14.12 of the Site Allocations Document. The overall figure of 400 should be reduced to 200 and sites reduced or deleted. Given Policy CS1 referring to “small-scale” developments the reductions should be concentrated in the view of the Society, on the larger site allocations.
3. The reductions and its replacement by an allowance for GS8 sites is consistent with the approach to Development on page 22 of the Core Strategy suggesting “Limited development to serve local needs” as housing built privately, which is not small-scale, is unlikely to cater for truly local needs and more likely to be occupied by house-seekers from elsewhere, which would without doubt add to carbon dioxide omissions driving climate change. Residents of villages in this part of Bedfordshire travel to work in diverse centres – London, Bedford, Hatfield, Hitchin, Luton, Letchworth and Stevenage. Local bus travel does not serve that multiplicity of routes. Because rural village development has mainly favoured 3 – 4 bedroom houses, these are attractive to people fleeing Luton and Stevenage. The instance of the Bovis estate on the site of Taylor’s Coach Yard in Meppershall is an example of large sites built in villages by national builders, where few residents are in origin “local” to the village or nearby and the majority travel to work by car in the nearby large towns or London. The result is that the large allocations made in the Rural Area are unlikely to serve ‘local need’ in the proper

sense but to be just sites as open to all as the large schemes in the Major and Minor Centres. Such is not consistent with the principles of sustainable development and the Core Strategy.

4. The approach to development on page 22 of the core strategy has already been noted. The limited development in rural areas is “to serve local needs and help support local services”. The emphasis on “local needs” is important and clearly the limitation in Policy CS1 to “small scale” sites is designed to be consistent with the stated approach to development. However, the manner of allocation in the Site Allocation Document neither
 - (i) provides for “local needs” on a comprehensive all district basis in the rural areas nor
 - (ii) observes the limitations to “Small-Scale” sites consistent with the scale and character of the village.

As to (i)

Of the 15 larger villages, only 9 have been made the subject of an allocation. Of the remaining 6, Silsoe appears to be in an anomalous position. It is treated in the text as a Minor Centre in Policy CS1 and on page 71 is allocated 400 houses, but, still remains in the category of large villages. There are therefore 5 where it is claimed that no provision for “local need” is justified. In the list of smaller villages only 5 out of 24 appear to have local need. There is no explanation in the submitted documents as to how the criterion has been applied and it is implausible to predicate that the “local” need identified applies in but 13 village communities out of 39 and that the other 26 have no “local need” within the policy. If site allocation is to reflect the Approach to Development claimed in the Core Strategy the allocations should be revised and the claims of the omitted villages acknowledged. Study of the allocations by reference to the population of parishes in Mid-Bedfordshire in 2007 discloses that of the parishes in West Mid Bedfordshire housing allocations have been made only to Clophill, Maulden, Shillington and Stondon within the Rural Area in the Plan. The first three villages, assuming 30 houses per hectare, amount to 53. Stondon is linked to Henlow and is part of the cluster of villages in South East Bedfordshire, where the large allocations have been made. Villages in Western Mid-Bedfordshire with significant populations in 2007 have been wholly omitted in terms of the recognition of local need, for example, Aspley Guise (2040 population), Flitton and Greenfield (1380), Harlington (2200), Haynes (1090), Houghton Conquest (1830), Lidlington (1230), which has a railway station and Westoning (2190). The Site Allocations “limited to local need” in this respect do not conform with the Core Strategy. There is no justification in terms of the Core Strategy for the distribution which has been made, weighting the villages in southern east Bedfordshire with housing to meet “local need” but disregarding substantially the western part of the District. The notion, as already pointed out, that “local” need is divisible so that the majority of communities have none, while others have large requirements, is irrational. No reasonable authority acting on the basis of the Adopted Core Strategy could arrive at such a conclusion and the Site Allocation Plan is unlawful.

As to (ii)

Given the limitation on the ability to control occupation of new housing to local people without public intervention, the only mechanism available is to confine development to “small-scale” sites. The site allocation has not followed that approach with consistency. The weight of the allocations has been apportioned to four villages: Clifton (80 houses), Henlow Camp (70 dwellings), Meppershall (68 dwellings) and Langford (53 dwellings) amounting to 271 dwellings out of 417. These are not “small-scale” sites or allocations. The Henlow Camp site is 4.7 hectares (part mixed use), the main site in Meppershall 6.7 hectares (mixed use), and the Clifton site 2.76 hectares (no mixed use) and Langford 2.24 hectares (including a cemetery). The housing allocations are not “small-scale” and the concentration in the four villages is disproportionate, amounting to 57% of the Rural Area provision. In terms of the relationship to the scale and character of the villages concerned these allocations need to be examined by reference to the populations of the places affected. If parish populations in 2007 are converted into households (as a

reasonable equivalent to dwellings at a ratio of 2.4 persons per dwelling, the Meppershall provision represents an 11.08% increase on the 2007 housing stock. From 2001 to 2007 at Meppershall the stock increased by 10.8% between 2001 and 2007. The Core Strategy has as its object sustainable development reducing climate change. The increase and perpetuation of the high-growth rate in 2001 – 2007 is at variance with that policy. The position in Clifton is not dissimilar. The household change from 2001 – 2007 was a 6.8% increase in the housing stock and the site proposed at 80 dwellings would also be a 6.8% increase on the 2007 population, in other words, no variation in the upward curve of development and a failure to apply the criterion of sustainable development to it and diminish climate change. At Langford the allocation of two sites (44 plus 19 dwellings according to the Technical Report) providing 63 houses continues the 2001 – 2007 level of increase in stock virtually identically – 2001 – 2007 (4.91%) compared to 4.99%. The Stondon figure of increase is difficult to compare because Henlow Camp adjoins the parish and Henlow will include the camp itself. These are not “small scale” increases related to the scale and character of the villages meeting the object of the policy of catering for “local need” but rather for general need. The Society believes that “small-scale” should be limited generally to 1-15 dwellings and not exceed 20. Such levels can be of interest to small local builders and be more likely to attract, therefore, local occupants. Large sites tend, on the other hand, to attract national or regional builders who market homes over a wide area. The allocations above the suggested limits are not in conformity with the Core Strategy in the view of the Society.

5. Summary

For the above reasons set out in paragraph 1-4 the Society is of the view that the site allocation Plan is not in conformity with the Core Strategy and reserves the right, should the Clifton site remain in the allocations as planned to challenge the lawful validity of the allocations. The exercise should be re-examined to take account of the requirements of the Core Strategy framework properly applied. To disregard them is a failure to take account of relevant circumstances applying to the submission.

6. Methodology

The analysis used for comparison of the sites in the Technical Report has been done by reference to a methodology which is subject to significant limitations. The outcome depends wholly on the categorisation of the points being considered, the comprehensiveness of the points and subjective judgments, i.e. whether the site relates well or not to the general area. Analysis of the categorisation, for example, in relation to the Clifton site (H261 in the Consultation Documents) for example, seems to disregard an important element of this site. The site is in fact at the entrance of the Conservation Area at the northern section of New Road which forms the southern entrance to the area. It is noted that the Policy CS15 provides that the Council will protect, conserve and enhance the districts Heritage including Conservation Areas and their setting. That accords with the approach of the Secretary of State who has dismissed appeals with regard to the effect on the setting of Conservation Areas. Yet in the appraisal document (Stage 3) for the Clifton site, the element of ‘Conservation’ is marked as “none”. It would appear that the categories were narrowly drawn so that important but more intangible elements in the assessment were not reflected. A similar position appears to hold for Biodiversity considerations including biodiversity networks.

It is also noted that in relation to the result of scoring in Stage 2 based on essentially on employment, services, physical relationships and public transport, the resulting scores have not in themselves determined the allocations. Among the village sites for example Maulden has a site scoring 73 but the site allocated in the village scores only 48. The Major and Minor Centre scores veer widely on allocated sites from 247 (Flitwick) to -5 (Wixams). The manner therefore in which the analysis has been used is not clear because in the end the scores seem only to constitute a background to which little weight has been given in making the site allocations themselves. The actual allocations are wholly subjective.

7. Clifton

Site H16 lies to the south of the village with its frontage to New Road. The latter road forms the southern entrance to the Conservation area, which includes the traditional village area in Shefford Road, Broad Street, Church Street and Grange Street. The road from the A507 is banded by hedges and has a rural character. The frontage of site H16 is strongly hedged and together with the mainly Victorian cottages and the field opposite forms a gateway to the conservation area. In 1974 the Conservation Area was designated in part to preserve its rural character. Both to its East and west the village had experienced modern estate development. Development has occurred in the Conservation Area, some of it not necessarily desirable such as aggressive detached dwellings in Church Street, but, much of the openness remains. The importance of New Road to the area is that it brings a rural setting right up to Victorian cottages, which gives a dense 19th century style to the village core. In Grange Street and Church Street the loose built texture enables the area to retain a diverse biodiversity. The maintenance of that biodiversity depends on the existence of “networks” to the country which are not blocked. Surveys done indicate strong bio-diversity in the area of the Fairfax Drive gardens and Clifton Grange, but, it is dependent on the countryside remaining proximate: at present the distance from agricultural land north of Pedley lane servicing this network to south of Shefford Road is 300 metres. Should HA16 be developed the distance will be increased to 400 metres.

The rapid expansion of the village since 1960, which continues with current consent for 61 houses, has ensured that village facilities and services have been sustained. There is a general store/post office, a hairdresser, a butcher, two public houses and an Indian restaurant. The Lower School is understood to be full and there is a Church Hall and a Community Centre. The nearest medical centre is at Shefford as is the Upper School and the nearest supermarkets (Morrisons and Tesco).

Bus services to the village are limited. There is only one service which would be able to cater for commuting daily to Bedford and Hitchin, (M1, M2). No other employment centre is served, save for occasional services (such as 197) which runs on Tuesdays only, the return bus being at 14.23 to Milton Keynes. Travel for all purposes is therefore dominated almost completely by use of the car.

8. Conservation Area Consideration

Attention has already been directed to policy CS15 (see paragraph 6 above) which aims at the preservation and enhancement of Conservation Areas and their Settings.

Site HA 16 commences within 30 metres of the Southern edge of the conservation Area and will occupy with a suburban type estate the frontage south for 100 metres. At present this open site with its mature hedge links the country to the original village cottages a line of which extend 90 metres south of the Conservation Area boundary broken only by a site for two bungalows which are set back. The remainder of the frontage opposite site HA16 comprises open agricultural land. The housing to the south of HA16 is very low density in and among hedges and trees. The overall effect is to create a “rural” gateway to the Conservation Area consistent with the nature and character of an agricultural villagescape reflecting its 19th century past. Development on this site will be visible from the road beside the pond, which is described in the Conservation Area Appraisal (January 2004) as follows – “The area around the village pond contributes positively to the character of Clifton; often children are seen with their parents and grandparents feeding the ducks, the noise of the ducks adds to the sense of rural idyll”. Residents enjoying that local amenity have at present a view south to a well restored weatherboard building framed by an open sky and a distant view of trees. The allocation will replace that view by creating an urban estate view behind the restored farm building and eliminate one of the elements relating to the “rural idyll” identified in the Conservation Area. It will harm the setting of a positive contribution to the Conservation Area.

The use of the HA16 land for housing neither preserves the entry setting to the to the Conservation Area nor enhances it. It destroys one of the two routes into the Conservation Area which still make a visual statement that Clifton is a country village (Stamford Lane and New Road). It also harms the visual amenities around the pond area

and does not preserve them. It therefore harms the area and its development, is inconsistent with national policy and Policy CPS15 of the Core Strategy and is not in conformity with that document.

The Society is also concerned that the allocation of site HA 16 will lead to the development of land presently developed at a low density to the north east adjacent to the Conservation Area further derogating from its setting. The Shefford Road entrance has already been urbanised by the replacement of the last single storey cottage (probably from the eighteenth century) by three suburban-style houses and thus degraded. For a similar position to arise on the sites of 70 and 71 Shefford Road (the bungalows) and on the house curtilage of the dwelling house north of the site in New Road would be, in the view of the society, unacceptable.

9. Biodiversity Consideration

Overall diversity of species and plants is now protected by the Natural Environment and Rural Communities Act (2006). Section 40 imposes a duty on local authorities (including local planning authorities) to conserve biodiversity. The duty provides that:

- Every Public Authority must in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions to the purpose of conserving biodiversity. Conserving biodiversity includes in relation to a living organism or type of habitat restoring or conserving a population or habitat.

In paragraph 7 above it has already been pointed out that the biodiversity within the village, which exists, depends for its survival for corridors (networks) of open and treed land to provide for the passage through the village of species passing from one area of agricultural open land to another. Such a corridor links the land north of Pedley Farm with the land now being suggested as housing area H16. That corridor has traditionally passed through Pedley Farm, Fairfax Close and Clifton Grange to the Shefford Road area. The Pedley Farm portion of the link is already affected by a proposal for low density development where the character of the landscaping will be significant. The present proposal at a theoretical density of about 29 to the hectare further obstructs the corridor to open land by adding 110 metres of linear development, which will block use of the corridor by species found in the village.

The Society has had the advantage of the advice of a leading local expert on Nature conservation (Mr Alan Outen) who has considered the effect on the biodiversity of the current proposals. The advice is:

Clifton has an extraordinarily rich biodiversity with a total of 1536 recorded species (Fully documented lists available if required). This includes 265 naturally occurring flowering plant species, 311 fungi (among them the Red Data listed *Jafneadelphus amethystinus* with only 9 British records), and 75 species of birds. The birds include 12 Red-listed species (Herring Gull; Cuckoo; Skylark; Spotted Flycatcher; Fieldfare; Redwing; Song Thrush; Yellowhammer; Linnet; House Sparrow; Tree Sparrow; Starling;) and 20 Amber-listed species (Little Egret; Mallard; Eurasian Teal; Tufted Duck; Kestrel; Black-headed Gull; Lesser Black-back Gull; Stock Dove; Common Swift; Common Kingfisher; Green Woodpecker; Barn Swallow; House Martin; Grey Wagtail; Dunnock; Common Whitethroat; Willow Warbler; Mistle Thrush; Reed Bunting; Bullfinch). Red is the highest conservation priority, with species needing urgent action, mainly considered as globally threatened, Amber listing is mostly for species giving serious cause for concern. The majority of these are of regular occurrence. In addition a number of species uncommon in the County are also often present in the village. In recent years however we have lost House Martins from the village, Swallows, have all but gone and Swifts are under threat.

The eighteen species of mammals recorded in the village include at least four species of bats which occur within the village (all British Bat species are protected by law) whilst Hedgehogs are relatively common but are giving cause for concern nationally as a

declining species. Over 420 moth species have been recorded in the village – a total far exceeding that recorded from many SSSI's.

There are a number of reasons why Clifton is so important for biodiversity, including the mosaic of available habitat and a more or less open corridor through the village that enables free movement of species.

Although the proposed development site has no major intrinsic ecological value it is important nonetheless to appreciate that it will undoubtedly have an impact on the biodiversity of the village and of the surrounding area.

As an ecologist I am concerned that the isolation of species populations is a major threat to a sustainable biodiversity. I consider that the loss of the important open corridor through the village will be seriously detrimental to interconnections by species and that there will be reduced opportunities for birds to take advantage of winter feeding resources available in the village and for other species to flourish here. Other species groups such as insects and mammals are also likely to be detrimentally affected.

Biodiversity is not just about SSSI's or rare species though. A rich overall biodiversity is an important part of our heritage and continual building through in-filling or expanding settlements into the surrounding countryside poses a serious threat to this. Where biodiversity is known to be rich then it is important to safeguard this wherever possible. One reason why many SSSI's in South-East England are deteriorating in their biodiversity is because of their increasing isolation in an urban sprawl.

Bird Conservation Status

Red is the highest conservation priority, with species needing urgent action.

Red list criteria

- Globally threatened
- Historical population decline in UK during 1800–1995
- Rapid (> or =50%) decline in UK breeding population over last 25 years
- Rapid (> or =50%) contraction of UK breeding range over last 25 years

Amber list criteria

- Historical population decline during 1800–1995, but recovering; population size has more than doubled over last 25 years
- Moderate (25-49%) decline in UK breeding population over last 25 years
- Moderate (25-49%) contraction of UK breeding range over last 25 years
- Moderate (25-49%) decline in UK non-breeding population over last 25 years
- Species with unfavourable conservation status in Europe (SPEC = Species of European Conservation Concern)
- Five-year mean of 1–300 breeding pairs in UK
- > or =50% of UK breeding population in 10 or fewer sites, but not rare breeders
- > or =50% of UK non-breeding population in 10 or fewer sites
- > or =20% of European breeding population in UK
- > or =20% of NW European (wildfowl), East Atlantic Flyway (waders) or European (others) non-breeding populations in UK

On the basis of this advice the Society is of the view that the carrying out of development on Site HA16 will remove accessibility from the corridor to open agricultural land and create an obstruction of 110 metres to the link route which will affect and diminish the recorded bio-diversity present in the village. The allocation of this site is therefore contrary to the provisions of Section 40 of the Natural Environment and Rural Communities Act 2006 and is not in conformity with the provisions and text supporting Policy DM15, which provides inter alia that “applications considered harmful to wildlife will be refused”. Any future development application would not accord with the policy in the Plan and that consideration is relevant to whether the site should be allocated.

Reference to the documents leading to the adoption of the allocation on this site does not disclose that any of the matters set out in this paragraph were taken into account and a relevant consideration has been, so far, disregarded.

10. Site Accessibility Consideration

In the technical report dealing with site H261 part of which has become site HA16, the schedule for the site notes that there are “Two acceptable access points, although access onto New Road should be discouraged.” The two accesses for HA16 comprise one to Shefford Road between two existing properties and a track adjacent to boundaries of houses onto New Road. Neither access, in the view of the Society, is adequate for an estate of 80 houses and it is noted that the policy qualifies the availability of the site by requiring “Provision of adequate access of the site”

The access to Shefford Road passes through a pinch point between the curtilages of the dwellings fronting that road. While that point has not been measured, the provision through this pinch point of a suitable access for an estate of 80 houses including access for refuse vehicles and furniture vans, i.e. possibly a 4.5 metre carriageway with footpath, will be constrained at best, even were it possible on a proper basis.

The access to New Road as planned is narrow and adjacent to the boundary trees of the house, the removal of which could be required up to the point where the main site is entered. That would have an effect in the local landscape in the area. Provision of an adequate access to an estate of the size proposed would also be constrained.

The use of New Road is in any event undesirable in traffic terms as the Technical Report implies. The existing road from the commencement of the cottages on the east side to the junction with Shefford Road is the subject of parking which reduces the carriageway to a single lane. At times (week-ends, evenings and school holidays) there is a line of parked vehicles for about 120 metres. Visibility on entry into New Road from Shefford Road, because of a slight bend at the end of the parked cars, is impeded. There is no pull-in place at times of heavy parking apart from the entrance to the two bungalows in the line of dwellings. This section of road would require to be used and be needed by many residents of the estate going to and coming from the village and could be used by commuters who travel north east for work. The present usage of the road is unsatisfactory because of the single lane and causes delay and congestion in the route and at the Shefford Road junction. An additional flow of cars from the HA16 estate would severely aggravate that position.

In the view of the Society to allocate a Site for housing of the size proposed with potentially inadequate future accesses is not in the best interest of sound planning. There is no assurance that a proper estate access is possible to Shefford Road at this stage and access to new Road is undesirable.

11. Travel to Work

Large estate allocations are, as has been contended, likely to result in extensive travel to work over a wide area to the significant work destinations (see paragraph 3 above). The 80 houses likely or estimated on the basis of the Technical Report on the hectorage will produce in peak hours some 48 vehicular trips at least. The bus services at Clifton are such that it is most unlikely that the use of public transport facilities will reduce that figure save marginally. The only current bus services which serve employment destinations are Services M1 and M2 to Bedford and Hitchin, The 200 to Flitwick and Biggleswade runs only at inconvenient times for commuting. None of the other services (197, E7, WW7, WW8, and WW9 and WW13) are regular daily services. Access therefore other than by car to most of the major work centres is unlikely and a village such as Clifton is unsuitable in sustainability terms for estates of the size proposed in HA 16. The allocation conflicts in this respect with the Objectives of the Plan.

12. Visual Amenity and Residents

The discussion in paragraph 8 above relating to entry to the conservation Area raises the issue of local visual amenity. The development of site HA16 because of its prominence on New Road will affect the visual amenities of all the users of the road as well as the

cottages on the road and the houses on Shefford Road. Much of the landscape around Clifton has little quality. The northern approach of the village in Stanford Lane is the most attractive countryside but the hedges and trees of New Road with the open land perform a similar role to the south of the village. New development should be encouraged in locations where such quality as there is, however limited, is not affected.

13. Alternative Allocation

It is not the position of the Society that there should be no allocation at Clifton for local need. Providing any allocation complies with the Core Strategy as a “small scale” development designed for limited local needs, it is acceptable. The site needs not to do damage to the Conservation Area, Biodiversity or visual amenity. A development of up to 15 – 20 houses in the vicinity of Hitchin Lane would avoid much of the damage to the considerations listed above, although it would affect the amenity of local residents. Sites were suggested at the earlier stage in this location and should be examined. The access problems present on HA16 are unlikely to arise. The small-scale nature of the development is of course beneficial in limiting the impact of any allocation.

14. Conclusion

It is the contention of the Society that the Site HA16 should not be allocated for housing because –

- (i) its allocation is not in conformity with the Core Strategy and would be unlawful (see paragraphs 1 – 5)
- (ii) the Methodology leading to the allocations is questionable (see paragraph 6)
- (iii) its allocation damages significantly the Conservation Area and is contrary to Policy CS15 in the Core Strategy and national policies (see paragraph 8)
- (iv) its allocation does significant damage to considerations of biodiversity and is contrary to the duty imposed on the Council by Section 40 of the National Environment and Rural Communities Act 2006 and to Policy DU15 of the Core Strategy.
- (v) its allocation is undesirable by reason of the possible use by site vehicular traffic of New Road and the likely difficulty of proper access to the Shefford Road (see paragraph 10)
- (vi) its allocation at the scale proposed (80 dwellings) conflicts with the policy for sustainable development by promoting travel to work by car (see paragraph 11)
- (vii) its allocation is harmful to the visual amenity enjoyed by the users of New Road on the approach to the village and by local residents in the vicinity (see paragraph 12)
- (viii) a small-scale allocation of up to 15 or 20 houses could be accommodated on another site in the vicinity of Hitchin Lane without so much damage to the quality and character of the village (see paragraph 13)