

**Regulation 16 Consultation  
Clifton upon Teme Neighbourhood Plan  
February 2017**

**Schedule of MHDC Officer Comments**

<b>Draft Policy</b>	<b>MHDC Officer comments</b>
	<b>Executive Summary</b>
	<p><b>Introduction</b></p> <p>Paragraph 1.11- to ensure that the document does not become out-of-date, it is suggested that the word “recently” be deleted from the first sentence.</p> <p>Paragraph 1.4 refers to the number of dwellings “currently” approved or pending. To ensure that the document does not become out-of-date, it is suggested that the wording be amended to “At the time the NDP was being prepared (November 2016) there were applications approved or pending for a further 118 dwellings. If these were all approved the Parish <b>would</b> see ...”</p> <p>Paragraph 1.12 – There is a need to ensure that the weblink to the supporting documents works.</p>
	<p><b>2.0 Background to the Parish</b></p> <p>Paragraph 2.11 – It is suggested that the link is made between paragraph 2.11 and Maps 7a and 7b by adding “The two Environmental Character Areas are show on Maps 7a and 7b”</p>

	<p><b>3.0 Vision and Objectives</b></p> <p>In essence, the intention of the 6 Objectives appear to be about:</p> <ol style="list-style-type: none"> <li>1. Protecting the built, historic and natural environment</li> <li>2. Supporting economic development</li> <li>3. Meeting local housing needs</li> <li>4. Ensuring provision of a range of facilities for education and recreation</li> <li>5. Encouraging visitors by improving footpaths, bridleways and parking</li> <li>6. Encouraging partnership working</li> </ol>
	<p><b>4.0 Neighbourhood Development Plan Policies</b></p> <p>Paragraph 4.0.3 – It is suggested that the first paragraph be amended to read “The policies <b>seek to</b> focus <del>their</del> development ...“</p> <p>Is paragraph 4.0.4 necessary given that monitoring and review are covered in Section 6?</p> <p>The Proposals Map on page 20 is helpful, but it is suggested the Development Boundary, Conservation Area and Character zones are more clearly distinguishable.</p>
	<p><b>4.1 Landscape, Natural Heritage and Green Infrastructure</b></p>
<p><b>Policy CL1 Protecting and Enhancing Local Landscape Character</b></p> <p>Development proposals should respect the identified Significant Views on Map 3 which are locally valued and which make an important contribution to the neighbourhood area’s landscape character.</p> <p>Where a development proposal impacts on an identified Significant View, a Landscape and</p>	<p><b>Policy CL1 Protecting and Enhancing Local Landscape Character</b></p> <p>Policy CL1 seeks to:</p> <ol style="list-style-type: none"> <li>(i) Protect locally significant views,</li> <li>(ii) Ensure that new development takes local landscape character into account in order to protect and enhance the landscape character of Clifton upon Teme, and</li> <li>(iii) Encourage the re-use of excavation materials arising from development.</li> </ol> <p>Policy CL1 seeks to address three separate issues. It is suggested that the issues may be more appropriately be covered by separate policies.</p>

Visual Impact Assessment or similar study should be carried out to ensure that the landscape is not compromised.

Where appropriate, landscaping proposals in new development should take into account the latest Worcestershire Landscape Character Assessment and its guidelines in accordance with SWDP 25.

The following landscape design guidelines should be incorporated into schemes where appropriate:

In developments within Landscape Character Area Timbered Plateau Farmlands, landscaping schemes must demonstrate that they:

- Conserve any ancient woodland on the site, and restock with locally occurring native stock where appropriate.
- Support the coalescence of fragmented remnants of ancient woodland through new woodland planting, favouring native broadleaves with oak as the major species.
- Infill any gaps in tree cover along watercourses and dingles.
- Conserve hedgerow oaks and restore the pattern of hedgerows.

In developments within Landscape Character Area Principal Wooded Hills, landscaping

### Protecting Locally Significant Views

The policy seeks to protect locally significant views.

Whilst national and local planning policy protects local character, it does not provide or protect a “right to a view.” Consequently, land use planning policies relating to key vistas, intrinsic to local character, need to be carefully and appropriately worded.

Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publically accessible land).

While there is no legislative or regulatory requirement for neighbourhood plans to be accompanied by a proposals / policies map it is important that the views and vistas to which policies and proposals apply are clearly identified in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as required by paragraph 17 of the Framework. The inclusion of maps and photographs taken from viewpoints is a very helpful feature of the Draft Clifton upon Teme Plan providing additional clarity to assist decision making.

In relation to the policy seeking to protect locally significant views it is suggested that:

- A clear justification is provided for the protection of each view.
- To make the policy more concise, maps and photographs of the proposed significant views could be included in an Appendix.

### Protecting and Enhancing Local Landscape Character

Where appropriate, the policy seeks to ensure that new development takes local landscape character into account in accordance with SWDP 25 (Landscape Character). The policy also outlines the characteristics which should be incorporated across the four landscape characters

<p>schemes must demonstrate that they:</p> <ul style="list-style-type: none"> <li>• Conserve and, if necessary restore the ancient broadleaved character of any woodlands on the site.</li> <li>• Strengthen the wooded character of hedge lines and streamlines on the site through replanting or natural regeneration, taking account of the identified Significant Views.</li> </ul> <p>In developments within Landscape Character Area Riverside Meadows, landscaping schemes must demonstrate that they:</p> <ul style="list-style-type: none"> <li>• Conserve existing areas of permanent pasture on the site.</li> <li>• Conserve and enhance continuous tree cover along hedge lines, ditches and watercourses on the site.</li> <li>• Conserve existing wetland habitats, where possible provide further wetland habitat, and explore opportunities to return to patterns and processes of natural flooding cycles.</li> </ul> <p>In developments within Landscape Character Area Principal Timbered Farmlands, landscaping schemes must demonstrate that they:</p> <ul style="list-style-type: none"> <li>• Maintain and enhance hedgerows where appropriate.</li> <li>• Conserve ancient woodland sites and</li> </ul>	<p>covering the parish.</p> <p>The Framework says that the planning system should respond to local character (paragraph 58) and protect and enhance valued landscapes (paragraph 109).</p> <p>However, we have the following concerns about the policy as drafted:</p> <ul style="list-style-type: none"> <li>• Planning Practice Guidance says that policies should be concise and precise.</li> <li>• As the policy sets out the design guidelines for each of the four local character areas they may become dated when the 2011 Landscape Character Assessment is updated.</li> <li>• The supporting text should note that SWDP 25 only requires a Landscape and Visual Assessment on proposals of 10+ dwellings or &gt;1,000 sq m floorspace. Incorporating the proposed design guidelines in small or low impact developments may be onerous.</li> </ul> <p><u>Encouraging the re-use of excavation materials arising from development</u></p> <p>Encouraging the re-use of excavation materials arising from development is a laudable aim.</p> <p>However, it is not clear whether the proposed policy reflects and responds to the unique characteristics and planning context of the parish. The policy would be strengthened if evidence was provided to support the proposed approach. It would also be helpful if the policy was drafted with sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications.</p>
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<p>plant new woodland with locally occurring native species.</p> <ul style="list-style-type: none"> <li>• Conserve and restore tree cover along water courses and streamlines.</li> </ul> <p>Consideration should be given to the re-use of waste such as subsoils arising from the development process on site, for such purposes as landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation. Such proposals will be considered against relevant Environment Agency advice and policies in the Waste Core Strategy.</p>	
<p><b>Policy CL2 Protecting and Enhancing Biodiversity</b></p> <p>Development proposals that impact on local wildlife and habitats identified on Maps 5a, 5b and 5c and 6a and 6b should demonstrate how biodiversity will be protected and enhanced.</p>	<p><b>Policy CL2 Protecting and Enhancing Biodiversity</b></p> <p>Policy CL2 proposes that development proposals that impact on local wildlife and habitats identified on Maps 5a, 5b, 5c, 6a and 6b should demonstrate how biodiversity will be protected and enhanced.</p> <p>The objective of the policy appears to be consistent with the environmental objective of sustainable development in the Framework of “moving from a net loss of biodiversity to achieving net gains for nature” (paragraphs 9 and 109) and SWDP 22 (Biodiversity and Geodiversity).</p> <p>However, cumulatively, the sites identified on Maps 5a, 5b, 5c, 6a and 6b are extensive and the boundaries on some maps are not clear. This would make the policy difficult to apply consistently and with confidence when determining planning applications. Also, Maps 5a and 6b both relate to Local Wildlife Sites, but the difference between the two maps is not clear.</p> <p>Supporting text is provided for the Local Wildlife Sites on pages 39 and 40, but there does not appear to be evidence for protecting broadleaved woodland networks or areas covered by Biodiversity Action Plans.</p>

	<p>It is suggested that the supporting text draws on proportionate, robust evidence to justify the biodiversity sites which Policy CL2 is seeking to protect and that the boundaries of the sites are shown clearly on a single map.</p>
<p><b>Policy CL3 Green Infrastructure</b></p> <p>Where appropriate, new development should ensure the protection and enhancement of the existing green infrastructure assets and the creation of multifunctional green infrastructure networks as part of master planning, landscaping and building design. These networks should contribute to ecological enhancements, flood risk and water quality management, landscape and historic character of Clifton upon Teme. The proposal should demonstrate how these networks will be achieved and maintained in perpetuity.</p> <p>Proposals should include, for example, enhancements such as sustainable drainage systems (SuDS), re-naturalising watercourses and incorporating ponds, woodland planting, roosting opportunities for bats, the installation of bird nest boxes and the use of native species in the landscape planting.</p> <p>Priority habitats such as ancient woodlands, acid grasslands and wetlands and other environmental assets in the area should be protected to preserve the existing eco-system network.</p>	<p><b>Policy CL3 Green Infrastructure</b></p> <p>Policy CL3 seeks to ensure that, where appropriate, new development protects and enhances green infrastructure assets and encourages the creation of multifunctional green infrastructure networks.</p> <p>The supporting text for Policy CL2 describes the Teme Valley &amp; Wyre Forest and Eardiston Environmental Character Areas (ECA's) which cover the parish and sets out priorities for the ECA's, as outlined in the Worcestershire Green Infrastructure Framework.</p> <p>However, the Worcestershire Green Infrastructure Strategy priorities on which the policy is based are primarily concerned with the management and maintenance of the land, rather than development proposals, and therefore probably fall outside the remit of a neighbourhood plan. CL2 does not appear to translate the strategic Worcestershire Green Infrastructure Framework to the local level.</p> <p>As currently worded, it is considered that the policy lacks sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications.</p> <p>It is suggested that the supporting text for any Green Infrastructure policy in the neighbourhood plan could usefully provide a link to SWDP 5 (Green Infrastructure).</p>

<p>Where possible, SuDS should be provided as part of all new development schemes, regardless of size. At surface level SuDS provide the most opportunity for multiple benefits and should be considered before below ground SuDS. Schemes should ensure appropriate maintenance of SuDS for the lifetime of the development.</p>	
<p><b>Policy CB1 Design Guidance for New Buildings and Extensions in the Clifton upon Teme Conservation Area</b></p> <p>Development proposals for new buildings and extensions in the Conservation Area are required to respond positively to the following building design guidelines:</p> <ol style="list-style-type: none"> <li>1. Plot and Density - It is important that existing proportions of space, plot division and density are respected.</li> <li>2. Heights - The height of any new development should respect the height of the surrounding buildings and should not exceed two storeys.</li> <li>3. Scale - Most of the buildings in Clifton are of a small, domestic scale. Any changes which will not maintain or which disrupt this existing scale will be resisted.</li> </ol>	<p><b>4.2 Built Heritage and Design</b></p> <p><b>Policy CB1 Design Guidance for New Buildings and Extensions in the Clifton upon Teme Conservation Area</b></p> <p>Policy CB1 sets out design guidance for new buildings and extensions in the Clifton upon Teme Conservation Area.</p> <p>One of the Basic Conditions that apply to neighbourhood plans is that they have special regard to the desirability of preserving or enhancing the character or appearance of any Conservation Area.</p> <p>Policy CB1 proposes design guidance, based on Clifton upon Teme Appraisal and Management Strategy (April 2009), to help preserve and enhance the character or appearance of the Clifton upon Teme Conservation Area.</p> <p>CB1(2) proposes that no new development should exceed two storeys. Unless no current buildings in the Conservation Area exceed two storeys, this would appear severe.</p> <p>CB1(6) - Would a proposal for a single dwelling be required to have an integrated bin store and recycling facilities?</p>

<p>4. Materials - The use of traditional materials is encouraged within new development and colour and texture and uniformity of new brickwork should be complimentary and sympathetic to the surrounding area. Roofs are generally plain clay tile and this material should be used where possible. Alterations to existing buildings should seek to use the same materials as the original building as far as possible.</p> <p>5. Local building details - Traditional detailing, such as mortared verges, steeply pitched roofs, dormer windows and door and window patterns should be retained and, where appropriate, be reflected in new extensions or new development.</p> <p>6. Development proposals are required to provide integrated bin stores and recycling facilities to minimise visual impact.</p>	
<p><b>Policy CB2 General Building Design Principles for Development within the Development Boundary</b></p> <p>Development proposals for new buildings and extensions in the village within the development boundary are required to respond positively to the following building design principles:</p>	<p><b>Policy CB2 General Building Design Principles for Development within the Development Boundary</b></p> <p>Policy CB2 proposes design guidance for development that is outside the Conservation Area, but within the development boundary.</p> <p>The Government is seeking to support high quality design in all new development. The Framework (paragraph 58) says that neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on an understanding and evaluation of its defining</p>



<p>1. New development should enhance and reinforce the local distinctiveness of Clifton upon Teme. New development should be of a scale, mass and built form which responds to the characteristics of the site and its surroundings, within the identified Character Zone (see Map 10 above and Appendix 6). Proposals should not feature designs specific to a generic “scheme” and should display how they take account of the locally distinctive character of the area in which they are to be sited.</p> <p>2. New buildings should follow a consistent design approach in the use of materials, fenestration and the roofline to the building. Materials should be chosen to complement the design of a development and add to the quality or character of the surrounding environment. New development proposals need not imitate earlier architectural periods or styles and could be the stimulus for the use of imaginative modern design using high quality traditional materials such as local stone in innovative ways.</p> <p>3. The use of natural materials from environmentally responsible sources is encouraged. Schemes should incorporate the use of energy saving materials, and materials of high quality, which have been reclaimed, salvaged or recycled from appropriate sources</p>	<p>characteristics.</p> <p>Following a character appraisal by the neighbourhood plan Steering Group, the Plan indicates that 13 different character zones were identified within the Development Boundary. Appendix 6 of the Plan summarises the key characteristics of the 13 character zones. This is an innovative approach which clearly seeks to take account of local distinctiveness.</p> <p>Paragraph 4.2.5 indicates that a copy of the village Character Appraisal is on the Clifton upon Teme NDP website. It would be helpful if the NDP included a weblink to the document.</p> <p>Map 9 shows the Clifton upon Teme Character Zones. The key in the bottom left corner of the map needs to be clearer.</p> <p>CB2(2) makes clear that contemporary design will be encouraged as well as traditional design. In this way the policy encourages innovation, originality, or initiative in line with paragraph 60 of the Framework.</p> <p>CB2(3) – proposes that schemes should incorporate high quality materials “which have been reclaimed, salvaged or recycled from appropriate sources to support resource efficiency”. There does not appear to be any evidence to support this requirement and it may be considered to be overly prescriptive.</p> <p>CB2(4) – It may be worth noting that pollution (including light and noise) is addressed in SWDP 31 (Pollution and Land Instability). Private security lighting is not development and as such cannot be controlled under planning. Also, star gazing and appreciation of the night sky are not material considerations in planning.</p> <p>CB2(5) - Would a proposal for a single dwelling be required to have an integrated bin store and recycling facilities?</p>
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<p>to support resource efficiency. Where possible locally appropriate materials should be used such as red brick and plain clay tiles.</p> <p>4. Proposals should minimise the adverse impact on local residential amenity and give careful consideration to noise, odour and light. Light pollution should be minimised wherever possible. Street lighting is not appropriate; the area's dark skies support local wildlife and encourage star gazing and appreciation and understanding of the night sky.</p> <p>5. Development proposals are required to provide integrated bin stores and recycling facilities to minimise visual impact.</p>	
<p><b>Policy CB3 Protecting Historic Farmsteads</b></p> <p>Redevelopment, alteration or extension of historic farmsteads and agricultural buildings within the Neighbourhood Area should be sensitive to their distinctive character, materials and form.</p> <p>Due reference and consideration should be made to the Worcestershire Farmstead Assessment Framework.</p>	<p><b>Policy CB3 Protecting Historic Farmsteads</b></p> <p>Policy CB3 proposes design guidelines for the redevelopment, alteration or extension of historic farmsteads.</p> <p>Farmsteads, and in particular traditional farm buildings of 19<sup>th</sup> century or earlier date make an important contribution to local distinctiveness and a sense of place, through their varied forms, use of materials and the way they relate to the surrounding form and patterning of landscape and settlement.</p> <p>Policy CB3 proposes design guidelines set out in the Worcestershire Farmstead Assessment Framework (2014) to inform and achieve the sustainable development of historic farmsteads, including their conservation and enhancement.</p> <p>Map 10 helpfully shows the location of the historic farmsteads and Appendix 5 lists the historic farmsteads. It is suggested that Map 10 showing the location of the historic farmsteads</p>

	needs to be clearer.
<p><b>Policy CB4 Archaeology</b></p> <p>Development proposals in areas shown on maps in the Historic Environment Record (HER) for Clifton upon Teme Parish must take account of known surface and subsurface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development.</p> <p>In all instances the Worcestershire Historic Environment Record should be consulted at an early stage in the formulation of proposals.</p>	<p><b>Policy CB4 Archaeology</b></p> <p>Policy CB4 <u>requires</u> development proposals in areas shown on maps in the Historic Environment Record (HER) to take account of known surface and subsurface archaeology.</p> <p>The Framework (paragraph 128) says that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>SWDP 24 (Management of the Historic Environment) says that where proposals are likely to affect heritage assets with archaeological interest they <u>should</u> be accompanied by a description informed by available evidence, desk-based assessment and, where appropriate, field evaluation to establish the significance of known or potential heritage assets.</p> <p>To provide a framework by which decisions can be made with a high degree of predictability and efficiency it is suggested that the policy includes a map (or links to a map) showing areas of known surface and subsurface archaeology in the parish.</p> <p>The 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs in 4.2.13 do not relate directly to archaeology in Clifton upon Teme and it is suggested that they could be deleted.</p>
<p><b>Policy CB5 Protecting Local Heritage Assets</b></p> <p>Proposals requiring consent which affect a building or structure on the Local Heritage List (following adoption by Malvern Hills District Council) must demonstrate how they protect or enhance the heritage asset.</p>	<p><b>Policy CB5 Protecting Local Heritage Assets</b></p> <p>Policy CB5 seeks to protect non-designated heritage assets. The Policy proposes 7 non-designated heritage assets for consideration in the MHDC Local List SPD.</p> <p>Heritage assets are an irreplaceable resource and the Framework (paragraph 17) requires that historic assets should be conserved in a manner that is appropriate to their significance.</p>

<p>The renovation or alteration of buildings or structures identified on the Local Heritage List should be designed sensitively, and with careful regard to the heritage asset's historical and architectural interest and setting.</p>	<p>The policy rightly distinguishes between designated heritage assets (such as listed buildings and conservation areas) and other heritage assets (identified by the local authority).</p> <p>The aspiration to identify non-designated heritage assets through the neighbourhood plan process is appropriate. The policy rightly makes clear that the Local List will be designated and maintained by Malvern Hills District Council and proposes 7 heritage assets for consideration of Local Listing in Appendix 10.</p> <p>The Local List SPD (May 2015) says that local heritage assets will need to be significant with regard to at least one of the following - a significant period in the District's history, the social history of the District or a notable example of planned or incidental planning or associated with an individual of local importance. In addition a nominated asset will need to be significant having regard to one or more of the following – age, rarity, aesthetic value, group value, evidential value, archaeological interest, designed landscape, landmark status and social / communal value. It would be helpful if Appendix 10 included a schedule seeking to justify each of the proposed non-designated heritage assets.</p> <p>The proposed non-designated heritage assets are also listed in paragraph 4.2.15. It is suggested that the assets should not be listed in paragraph 4.2.15 because the list will become out-of-date if any of the assets are not included in the Local List or additional assets are subsequently Listed.</p>
	<p><b>4.3 Housing</b></p> <p>Figure 2 shows the age structure of those living in the parish. The purpose of the figure for decision taking is unclear. Also, the age groups shown in the figure appear to be quite random. There is a 15 year age group (for 45 to 59 year olds), a 10 year age group (65 to 74 years old), whilst for others there are 5, 4, 3 and 2 year age groups, and a specific group for 15 year olds.</p>
<p><b>Policy CH1 New Housing Development in Clifton upon Teme village</b></p>	<p><b>Policy CH1 New Housing Development in Clifton upon Teme village</b></p>

<p>New housing development within the Clifton upon Teme village development boundary (Map 11) will be considered favourably if:</p> <ol style="list-style-type: none"> <li>1. It is infill development on previously developed land, or is the conversion, re-use or extension of an existing building; and</li> <li>2. It does not lead to the loss of community or recreation facilities or local employment opportunities; and</li> <li>3. It accords with other relevant policies of the Clifton upon Teme Neighbourhood Development Plan and South Worcestershire Development Plan.</li> </ol>	<p>Policy CH1 seeks to support small-scale housing development within the village development boundary.</p> <p>As background, the Objectively Assessed Housing Need (OAHN) to 2030 in south Worcestershire is 28,370 dwellings. The SWDP makes provision for around 28,400 dwellings to meet this need, including 45 in Clifton upon Teme parish (30 on land at Hope Lane and 15 at Church House Farm. In addition there have been further planning approvals outside of the settlement boundary, including 20 dwellings opposite Steps Farm and 48 dwellings at Blueshot Meadow. In light of this, it is considered that there is no immediate need to identify sites for further development in Clifton upon Teme within the Neighbourhood Plan.</p> <p>Notwithstanding the above, Policy CH1 provides flexibility and supports small scale development within the development boundary, providing it accords with other policies in the Plan and SWDP. It is, however, considered that restricting infill development to previously developed land may be too restrictive.</p> <p>Policy CH1 is considered to be in general conformity with the strategic policy SWDP 2 (Development Strategy and Settlement Hierarchy). SWDP 2 focuses most development on the urban areas where both housing needs and accessibility to lower-cost public services are greatest. SWDP 2B says windfall development proposals will be assessed in accordance with the settlement hierarchy. Clifton upon Teme is identified as a Category 1 settlement in the hierarchy. The role of Category 1 settlements in the SWDP is predominately aimed at meeting locally identified housing and employment needs.</p> <p>Map 11 correctly shows the revised settlement boundary for Clifton upon Teme which includes the SWDP allocation (Hope Lane) coterminous with the development boundary.</p>
<p><b>Car Parking Standards</b></p> <p>Car parking provision should be provided at a rate of 1 space per bedroom on all new housing schemes.</p>	<p><b>Car Parking Standards</b></p> <p>This policy seeks to ensure that car parking in all new housing developments is provided at a rate of 1 parking space per bedroom.</p> <p>Paragraph 4.3.13 explains that the introduction of the policy is in response to concerns about street parking raised during informal consultation.</p>

	<p>The Written Ministerial Statement on 25<sup>th</sup> March 2015 (<a href="http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/">http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/</a>) says “Local Planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.” This obligation applies equally to neighbourhood plans.</p> <p>It is considered that car parking standards may not be the solution to concerns about street parking around the village centre and school. It is also probably not appropriate to address car parking in the section of the Plan which deals with the location of new housing.</p> <p>It is suggested that any supporting text should make reference to the County Council’s Parking Standards in Appendix A of the Worcestershire County Council’s Highways Design Guide at <a href="http://www.worcestershire.gov.uk/downloads/file/1847/highways_design_guide">http://www.worcestershire.gov.uk/downloads/file/1847/highways_design_guide</a>. If the current County Parking Standards are not considered appropriate, it would be helpful to explain why this is considered to be the case.</p> <p>It is suggested that a car parking policy along the following lines may be <b>more</b> appropriate – “Proposals must provide adequate parking in accordance with the standards adopted at the time”.</p>
<p><b>Policy CH2 New Housing Development and Extensions in the Parish’s Countryside Area</b></p> <p>New housing development in the open countryside, outside the Clifton upon Teme village development boundary (Map 13) will be considered favourably if it is:</p> <p>1. A dwelling clearly necessary for use by rural workers including persons employed in</p>	<p><b>Policy CH2 New Housing Development in the Parish’s Countryside Area</b></p> <p>Policy CH2 seeks to strictly control housing development in the open countryside in accordance with SWDP 2. The policy provides flexibility for new development for use by rural workers, rural exception sites, replacement dwellings, house extensions and conversions.</p> <p>It is considered that Policy CH2 provides a clear local interpretation of SWDP 2C as it relates to housing development.</p> <p>Reference to Map 13 in the policy should be amended to Map 11.</p>

<p>agriculture, horticulture, forestry or a rural enterprise; or</p> <p>2. Affordable housing on an exception site to meet identified local need; or</p> <p>3. A replacement of an existing dwelling with established use rights and where the replacement dwelling does not exceed the original footprint by 30%; and</p> <p>4. It accords with other relevant policies in the Clifton upon Teme Neighbourhood Development Plan and South Worcestershire Development Plan.</p> <p>Extensions to existing dwellings will be supported providing that they are subordinate to, and do not dominate the character and appearance of the original dwelling.</p> <p>Conversions or the re-use of existing buildings will be supported providing there is no need for substantial reconstruction or need for large extensions.</p> <p>Car Parking Standards</p> <p>Car parking provision should be provided at a rate of 1 space per bedroom on all new housing schemes.</p>	<p>Given that Policy CH2 also relates to extensions and conversions, it is suggested that the word “new” be deleted from the policy name.</p> <p>In relation to car parking standards, see comments above.</p>
	<p><b>4.4 Employment and Tourism</b></p>

	<p>Paragraph 4.4.1 – 2<sup>nd</sup> sentence refers to shops (plural), whereas paragraph 2.20 says that there is only one shop serving the village.</p> <p>Paragraph 4.4.7 – It is suggested that reference to facilities outside the parish of Clifton upon Teme are deleted.</p>
<p><b>Policy ET1 Supporting Economic Growth and Protecting Existing Employment</b></p> <p>Existing business (B1), general industrial (B2) and warehousing (B8), tourism, leisure and/or recreation-related sites will be safeguarded for employment generating uses in line with SWDP Policy 12. Development of existing employment generating will be supported when:</p> <ol style="list-style-type: none"> <li>1. It is to support expansion of an existing use on an existing employment generating site and would not lead to encroachment into the open countryside;</li> <li>2. They do not have an adverse impact on residential amenity and the local road network; and</li> <li>3. They are of good design and do not have a negative impact on the local landscape.</li> </ol>	<p><b>Policy ET1 - Supporting Economic Growth and Protecting Existing Employment</b></p> <p>Policy ET1 seeks to protect existing employment sites. The Policy also supports the development of existing employment sites, subject to there being no encroachment into the open countryside, no adverse impact on residential amenity, local road network and local landscape and there being good design.</p> <p>It would be helpful if the Policy (or supporting text) and/or Proposals Map clarified what employment sites the policy is seeking to protect. Blanket protection of employment sites may not be consistent with the paragraph 22 of the Framework.</p> <p>It would also be helpful if the wording in Policy ET1 was clearer that the policy relates to employment sites rather than businesses. The need for clarity is important because the neighbourhood plan relates to the development and use of land, not the development of businesses.</p> <p>It should be noted that Policy SWDP 12B provides a greater level of flexibility than ET1. Policy SWDP12B relates to the protection of existing employment sites and SWDP12C relates to the expansion of existing employment sites in rural areas.</p> <p><u>SWDP 12B:</u> To help promote rural regeneration across south Worcestershire, existing employment sites in rural areas that are currently or were last used for B1, B2, B8, tourism, leisure and /or recreation-related purposes will be safeguarded for employment-generating uses during the plan period. Proposals to change the use of such sites to any non-employment-generating purpose will need to demonstrate that the site has been actively marketed for employment, tourism, leisure or recreation purposes for a period of at least 12 months and that it is no longer viable for an employment-generating use. Details of what is required of a marketing exercise</p>



	<p>are contained in Annex F.</p> <p><u>SWDP 12C:</u> The expansion of existing employment sites in rural areas will be supported where it has been demonstrated that intensification of the existing site is not viable or practical.</p>
<p><b>Policy ET2 Supporting Homeworking</b></p> <p>Development for homeworking will be supported when it would involve alterations or extensions to an existing dwelling which are not significant, or it would be part of a proposal for a dwelling house that re-uses or brings back into use an existing building, where such development would not have an adverse impact on residential amenity, heritage or townscape or landscape character.</p>	<p><b>Policy ET2 Supporting Homeworking</b></p> <p>Policy ET2 supports alterations / extensions to existing dwellings for homeworking if they are not “significant”. Policy ET2 also supports the re-use of existing buildings (not necessarily dwellings) if part of the proposal is for a dwelling and the proposal does not have an adverse impact residential amenity, heritage or townscape or landscape character.</p> <p>Policy ET3 seeks to have regard to paragraph 21 of the Framework which says that plans should “facilitate flexible working practices such as the integration of residential and commercial uses within the same unit”.</p> <p>However, it is considered that homeworking rarely requires an extension to a dwelling. The decision maker would therefore need to assess whether a proposed alteration / extension is necessary to enable homeworking.</p> <p>In relation to the first part of ET2, on the one hand the supporting text acknowledges that minor alterations to dwellings are unlikely to require planning consent. On the other hand, the policy only seeks to support alterations or extensions which are not significant. It would be helpful if the policy was drafted with sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications.</p> <p>The second part of Policy ET2 refers to re-use of an “existing building”, but it does not specify that it should be an existing dwelling. The policy implies that the change of use of existing buildings which are not currently dwellings may be supported for homeworking if part of the proposal is for a dwelling. This would be more permissive than Policy CH2 and could conflict with Policy SWDP2.</p>
	<p><b>4.5 Recreation and Health</b></p>

<p><b>Policy CR1 Provision and Protection of Community Facilities and Services</b></p> <p>Changes of use of the shop, public house, post office, school, village hall or nursery will be resisted unless it can be demonstrated that the existing use is no longer economically viable or equivalent or better provision of the facility to be lost is made in an equally or more accessible location.</p> <p>If the existing use is no longer economically viable, evidence should be provided to show that the site has been actively marketed, at the market rate current at the time, for at least 12 months and that no sale or let has been achieved during that period.</p>	<p><b>Policy CR1 Protection of Local Community, Retail, Commercial Facilities and Services</b></p> <p>Policy CR1 seeks to protect the following 7 named community facilities from change of use unless it can be demonstrated that the existing use is no longer economically viable or equivalent or better provision of the facility to be lost is made in an equally or more accessible location:</p> <ul style="list-style-type: none"> <li>• St Kenelm's Church</li> <li>• The Lion Inn</li> <li>• Primary School</li> <li>• The Village Stores</li> <li>• Village Hall</li> <li>• BP Hut</li> <li>• Sports Pavilion</li> </ul> <p>The supporting evidence in paragraph 4.5.5 refers to SWDP 10 I which relates to change of use of village shops to non-retailing purposes.</p> <p>Paragraphs 4.5.1 to 4.5.3 provide interesting background information about community clubs and facilities in Clifton upon Teme, but much of the information is not related to land-use planning issues and is not relevant. It is therefore suggested that these paragraphs are edited-down.</p> <p>The Parish Council could consider nominating certain buildings eg public house as Assets of Community Value. The driving principle of the Assets of Community Value legislation is to provide a Community Right to Bid should such assets come onto the open market thereby offering communities an opportunity to seek to acquire and operate a local asset for the benefit of the local and wider community.</p>
<p><b>Policy CR2 Provision of Buildings for Community Use</b></p>	<p><b>Policy CR2 Provision of Buildings for Community Use</b></p> <p>Policy CR2 supports development proposals for new or expanded community and recreation</p>

<p>Development proposals for new or expanded community and recreation facilities will be supported provided that:</p> <ol style="list-style-type: none"> <li>1. The siting, scale and design respects the character of the surrounding area, including any historic and natural assets; and</li> <li>2. It is accessible to the community it is to serve; and</li> <li>3. The impact on the residential amenity is acceptable; and</li> <li>4. There is no adverse impact on traffic generation, and adequate parking is provided on the site.</li> </ol>	<p>facilities, subject to appropriate safeguards.</p>
<p><b>Policy CR2 Local Green Spaces</b></p> <p>Green spaces as identified on Map 14 Local Green Spaces will be protected from development except in very special circumstances.</p> <p>These identified local green spaces are:</p> <ol style="list-style-type: none"> <li>1. Village green;</li> <li>2. Area around horse chestnut tree/telephone box;</li> <li>3. Playing Field;</li> <li>4. Two green areas at top of Manor Road;</li> <li>5. Green Verge on Kenelm Road;</li> <li>6. Two green areas in Forge Meadows;</li> </ol>	<p><b>Policy CR2 Local Green Spaces</b></p> <p>Policy CR2 identifies and seeks to protect 10 Local Green Spaces. The identified Local Green Spaces are:</p> <ol style="list-style-type: none"> <li>1. Village Green;</li> <li>2. Area around horse chestnut tree/telephone box;</li> <li>3. Playing Field;</li> <li>4. Two green areas at top of Manor Road;</li> <li>5. Green Verge on Kenelm Road;</li> <li>6. Two green areas in Forge Meadows;</li> <li>7. Well Ground;</li> <li>8. Children’s Play Area in Pound Lane;</li> <li>9. Village Hall grass area;</li> <li>10. Kenelm Close green space.</li> </ol>

<p>7. Well Ground;  8. Children's Play Area;  9. Village Hall grass area;  10. Kenelm Close green space.</p>	<p>The Plan includes a map (Map 14) showing the location of the 10 sites. It is accompanied by a helpful Schedule (Table 2), which sets out a justification for the 10 sites.</p> <p>The Framework makes provision for a neighbourhood plan to identify Local Green Spaces of particular importance to the local community. Paragraph 76 states that 'by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances'. It would be helpful if the supporting text provided examples of "very special circumstances".</p> <p>Local Green Space is a restrictive and significant policy designation. It gives the land a similar status to that of Green Belt and for that reason the Framework states that such designations will not be appropriate for most green areas or open space. It should only be used when the green space is in reasonably close proximity to the community it serves, where it is demonstrably special to the local community and holds a particular local significance. The allocation of each Local Green Space within the policy therefore requires robust justification, which Table 2 seeks to do.</p> <p>The Framework distinguishes between Open Space (in paragraphs 73 – 74) and Local Green Space (paragraphs 76 – 78). The Framework glossary definition of Open Space is "all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity." Each site identified as a Local Green Space must address the criteria in the Framework, and most particularly demonstrate why it is "demonstrably special" and "holds a particular local significance".</p>
<p><b>Policy CR4 Supporting Health and Wellbeing in Clifton upon Teme</b></p> <p>New development within the Neighbourhood Plan area should contribute to the health and wellbeing of local communities through:</p> <p>1. Encouraging healthy lifestyles through</p>	<p><b>Health and Wellbeing</b></p> <p><b>Policy CR4 Supporting Health and Wellbeing in Clifton upon Teme</b></p> <p>Policy CR4 seeks to support health and wellbeing in new development by encouraging healthy lifestyles, opportunities for community cohesion, public transport provision, seating areas and clear signage. Policy CR4 also requires that all new development proposals be accompanied by a Health Impact Assessment.</p> <p>It is considered that the policy does not really provide a practical framework within which</p>

<p>providing opportunities for active travel and fresh food growing;</p> <p>2. Enhancing opportunities for community cohesion through creation of environments that encourage residents to get outdoors and participate in social interaction;</p> <p>3. Considering routes and public transport provision which offer convenient, safe and attractive access to employment, homes, schools and public facilities;</p> <p>4. Catering for the need of all age groups, in particular the elderly, through the provision of seating areas, shading and simple and clear signage.</p> <p>A Health Impact Assessment<sup>22</sup> will be required for new development proposals.</p>	<p>decisions on planning applications can be made with a high degree of predictability and efficiency as required by paragraph 17 of the Framework.</p> <p>The supporting text for Policy CR4 has been taken from the emerging South Worcestershire Health SPD which may change.</p> <p>It is suggested that the requirement for a Health Impact Assessment is likely to be overly onerous for small developments and may not be appropriate for all new development proposals.</p>
	<b>4.6 Infrastructure and Energy</b>
<p><b>Policy CI1 Communication Technologies</b></p> <p>Improvement and development of new mobile telecommunication infrastructure will be supported provided that:</p> <p>1. Its design and placement seeks to minimise impact on the visual amenity, character or appearance of the surrounding area; and</p> <p>2. Its design and siting does not have an</p>	<p><b>Policy CI1 Communication Technologies</b></p> <p>Policy CI1 supports the development and improvement of mobile telecommunication infrastructure providing that it is appropriately located and designed. Policy CI1 also supports the connection of superfast broadband to all new development unless it can be demonstrated that it would not be practical or economically viable.</p>

<p>unacceptable effect on the village Conservation Area, historical features and buildings, visually sensitive landscape or views.</p> <p>Improvements to broadband infrastructure will be supported. Any new development within the Parish should be served by a superfast broadband (fibre optic) connection unless it can be demonstrated through consultation with the NGA Network providers that this would not be possible, practical or economically viable. In such circumstances, suitable ducting should be provided within the site and to the property to facilitate future installation.</p>	
<p><b>Policy CI2 Supporting Improvements in Traffic Management, Signage and Street Furniture</b></p> <p>Clifton upon Teme Parish Council will support measures which achieve and maintain appropriate traffic speeds and civilised driver behaviours within the Neighbourhood Plan area, as well as enhancing the public realm to support walking and cycling as modes of choice, particularly for local trips.</p> <p>Where planning permission is required, any future replacement of existing or provision of</p>	<p><b>Policy CI2 Supporting Improvements in Traffic Management, Signage and Street Furniture</b></p> <p>Policy CI2 seeks to support traffic management measures in the parish. Policy CI2 also seeks to ensure that the design of new street furniture and signage is appropriate to the area.</p> <p>In relation to traffic management measures, Planning Practice Guidance says that neighbourhood plans can consider what infrastructure is needed to support development. Policies should, however, relate to additional infrastructure needed to enable development proposals to be delivered in a sustainable way.</p> <p>The concerns and proposals outlined in paragraph 4.6.4 relate to the aspirations of the local community to address the existing effects of vehicle movements in and around the village. They do not specifically relate to dealing with the effect of additional traffic generated by development proposals. The proposed measures are aspirations of local people and may more appropriately be addressed in Appendix 8 of the Plan that deals with actions for the Parish Council. Action 7 in Appendix 8 outlines infrastructure improvements that the Parish</p>

<p>new street furniture and signage should be of a design and quality that enhances the character of the Conservation Area and wider village.</p>	<p>Council will support.</p> <p>In relation to maintaining appropriate traffic speeds, it is considered that this does not relate to development per se, so cannot be controlled through the planning system.</p> <p>In relation to signage, it is appreciated that the local community want to ensure that street furniture and signage is appropriately designed. However, the link between signage and development proposals is tenuous. It is suggested that this issue may be more appropriately included in Appendix 8. This would enable the Parish Council to work with the County Council and other statutory agencies in the future.</p>
<p><b>Policy CI3 Supporting Low Carbon Energy Schemes and Technologies</b></p> <p>Community led initiatives for renewable and low carbon energy will be supported where schemes improve local access to low carbon energy for heat, power and transport schemes.</p> <p>Such schemes should minimise any adverse impacts on visual amenity, landscape and biodiversity and be sensitive to the character of the Conservation Area and other built heritage assets.</p>	<p><b>Policy CI3 Supporting Renewable and Low Carbon Energy Schemes and Technologies</b></p> <p>Policy CI3 seeks to support community-led initiatives for renewable and low carbon energy, subject to the impacts being acceptable in terms of visual amenity, landscape, biodiversity and also being sensitive to the significance listed buildings and the Conservation Area.</p> <p>Policy CI3 has regard to Planning Practice Guidance which says that neighbourhood plans are an opportunity for communities to plan for community led renewable energy developments.</p> <p>Policy CI3 does not provide any evidence about the types of renewable and low carbon energy installations that may be acceptable in the parish or any areas that may be suitable. The policy does, however, include a clear aspiration for community-led renewable and low carbon energy projects. Given that the policy specifically relates to community-led initiatives, it is suggested that it may be appropriate to re-title the policy “Community-led Renewable and Low Carbon Energy Schemes”.</p> <p>As background, SWDP 27 (Renewable and Low Carbon Energy) requires all new developments to incorporate renewable or low carbon energy equivalent to at least 10% of predicted energy requirements. SWDP 27 also supports stand-alone renewable and low carbon energy schemes (with the exception of wind turbines), subject to compliance with other relevant policies in the SWDP. The South Worcestershire Councils have not yet set out factors to be considered in determining proposals for renewable and low carbon energy, but will set out guidance in a Renewable and Low Carbon Energy SPD.</p>

	<p>Also, in June 2015, the Secretary of State for Communities and Local Government set out considerations to be applied to proposed wind energy developments. It made clear that planning permission should only be granted if the site has been identified as suitable for wind energy development in a Local Plan or Neighbourhood Plan and that the planning impacts identified by the affected local community have been fully addressed and the proposal has the local community's backing. The Clifton upon Teme Neighbourhood Plan has not identified sites suitable for wind energy.</p>
<p><b>Policy CI4 Energy Efficiency and Tackling Fuel Poverty</b></p> <p>New development is encouraged to incorporate energy efficiency measures and sustainable design wherever possible, to help address climate change. Good thermal performance of buildings is encouraged to help reduce fuel poverty rates, and ensure that local residents are able to live in warm, healthy homes which they can afford to heat.</p>	<p><b>Policy CI4 Energy Efficiency and Tackling Fuel Poverty</b></p> <p>Policy CI4 encourages energy efficiency in new development.</p> <p>Evidence of the need for new development to be energy efficient in Clifton upon Teme is compelling and encouraging energy efficiency is laudable.</p> <p>However, it is considered that Policy C14 does not really provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as required by paragraph 17 of the Framework. New development will have to incorporate energy efficiency measures to comply with Building Regulations. In reality, no planning application is likely to be refused on the basis that it did not comply with Policy CI4.</p> <p>As background, it is noted that the Written Ministerial Statement of March 2015 indicated that local planning authorities and qualifying bodies should not set in their emerging plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.</p>
<p><b>5.0 Next Steps</b></p>	<p><b>5.0 Next Steps</b></p>
<p><b>6.0 Monitoring and Review</b></p>	<p><b>6.0 Monitoring and Review</b></p>