

Table 1

Malvern Hills District Council Officer Comments

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NP
1. Malvern Hills District Council Officer Comments	All				<p>Clifton upon Teme Neighbourhood Plan (June 2016) Pre-Submission Consultation Draft</p> <p>Thank you for forwarding a copy of the emerging Draft Clifton upon Teme Neighbourhood Plan for comment.</p> <p>This is a Malvern Hills District Council officer response to the consultation draft. The response has not been considered nor endorsed by Members.</p> <p>A schedule of our comments is hereto attached.</p> <p>As a context for our comments, the National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so, it sets out requirements for the preparation of neighbourhood plans and the role these should take in setting out policies for the local area. The requirements set out in the Framework have been supplemented by guidance contained in</p>	<p>Noted.</p> <p>These matters are addressed in more detail in the schedule of officer comments below.</p>	<p>No change – see below for detailed changes.</p>

				<p>DCLG's Planning Practice Guidance (PPG) on Neighbourhood Planning.</p> <p>PPG on Neighbourhood Planning includes the following guidance on what evidence is needed to support a neighbourhood plan and how neighbourhood plan policies should be drafted:</p> <p><i>"Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan".</i></p> <p><i>"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared".</i></p> <p><i>"Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly</i></p>		
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				<p><i>identifiable. For example, set out in a companion document or annex”.</i></p> <p>In relation to the emerging Draft Clifton upon Teme Neighbourhood Plan, we consider that there is a need to strengthen the supporting text which explains the intention and rationale behind some of the policies. In order to be effective, some of the draft policies could also be more concise and made clearer to help decision makers apply them consistently and with confidence when determining planning applications. We appreciate that the Parish Council is responsible for editing the Plan and we are simply suggesting that you consider some alternative wording for some policies. Some of the draft policies in the neighbourhood plan also set out community aspirations which might be more appropriately described as projects or actions for the Parish Council. Where this is the case, we have suggested that they be moved to Appendix 8 of the Plan. PPG on Neighbourhood Planning also outlines the Basic Conditions against which a draft neighbourhood plan will be examined.</p> <p>As background, when the draft Clifton upon Teme neighbourhood plan is submitted to the District Council it will need to be accompanied by a Basic Conditions Statement and a Consultation Statement. The Basic Conditions, as applied to neighbourhood plans, are:</p> <p>“a. having regard to national policies and advice contained in guidance issued by the</p>		
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					<p>Secretary of State it is appropriate to make the neighbourhood plan.</p> <p>d. the making of the neighbourhood plan contributes to the achievement of sustainable development.</p> <p>e. the making of the neighbourhood plan 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).</p> <p>f. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</p> <p>Officers consider that the emerging Clifton upon Teme neighbourhood plan is logically structured and generally clearly presented. Our main comments on the emerging Plan are as follows: ☒</p> <ul style="list-style-type: none"> • Structure of the plan. Whilst it is a matter of choice for the Parish Council, it is suggested that the Plan could be clearer if the policies preceded the reasoned justification. • Policy CL1 – It is suggested that CL1 could be two separate policies – one relating to protecting significant views, the other protecting local landscape character. To make the policies more concise and enable decision makers to apply them consistently and with confidence, 	
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					<p>alternative policy wording has been suggested for your consideration.</p> <ul style="list-style-type: none">• Policy CL2 - It is suggested that the protection and enhancement of green infrastructure may be a community aspiration and could be included in Appendix 8 which deals with community projects / Parish Council actions. A possible policy seeking to protect local wildlife habitats is suggested.• Policy CB3 and CB4 – It is suggested that these policies could be made more concise.• Policy CB5 – It is suggested that the policy should relate to non-designated heritage assets because designated heritage assets already have a high degree of protection through legislation, national policy (the Framework) and the South Worcestershire Development Plan. Evidence to support the proposed non-designated heritage assets should be included with the Plan.• Car parking standards – It is suggested that reference be made to County Council car parking standards or the issue be included in Appendix 8 (Actions for the Parish Council).		
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				<ul style="list-style-type: none">• Policies ET1 – ET3 – These policies are potentially quite permissive of development in the open countryside. We have suggested that there is a need to strengthen the reasoned justification to explain what is intended and the rationale behind some aspects of these policies.• Policy CR1 – It is suggested that the CR1 is divided into two policies because it addresses two separate issues - the protection of existing community facilities and the development of new or expanded community facilities.• Policy CI1 – It is suggested that the policy could include broadband.• Policies CI2 and CI3 – It is suggested that improvements in traffic management, signage and street furniture, together with support for community-led renewable and low carbon energy projects could be more appropriately addressed in Appendix 8 related to Actions for the Parish Council. <p>We would like to congratulate the Parish Council and its volunteers for all the hard work that has clearly gone into preparing the draft Plan.</p>		
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					We hope that the schedule of comments is constructive and helpful. Should you have any queries in relation to our comments, or would like to discuss the comments further, please do not hesitate to contact me.		
MHDC Schedule of MHDC Officer Comments				Comment	<p>Structure and Presentation of the Plan</p> <p>Generally, the draft Plan is logically structured and clearly presented.</p> <p>However, the policies have been presented by preceding the policy with often lengthy background information. This somewhat detracts from the importance of the policies.</p> <p>Whilst it is a matter of choice for the Parish Council, it is suggested that a policy precede the reasoned justification.</p>	Noted.	No change.
				Comment	<p>Cover</p> <p>Planning Practice Guidance says that a neighbourhood plan must set out the period for which it is to have effect in accordance with (section 38B(1)(a) of the Planning and Compulsory Purchase Act 2004). The cover helpfully says that the Plan will cover the period to 2030. It is suggested that the time period during which the Plan is to have effect should be 2016 – i.e. the Plan is to cover the period 2016 – 2030.</p>	Accepted. Amend Plan as suggested.	Amend Plan. Amend front cover to provide the Plan period 2016 – 2030.
				Comment	Executive Summary	Accepted.	Amend Plan.

					Paragraph 3 – After (NPPF), suggest add “Planning Practice Guidance provides additional guidance on the application and implementation of the Framework’s approach.”	Amend Plan as suggested.	Paragraph 3 – After (NPPF), add “ Planning Practice Guidance provides additional guidance on the application and implementation of the Framework’s approach. ”
		1.3 1.8 1.9		Comment	<p>Introduction</p> <p>Paragraph 1.6 refers to the NDP Steering Group. It would be helpful if the role and composition of the Steering Group was explained at the beginning of the document – perhaps in a Forward or in paragraph 1.3.</p> <p>When the Parish Council submits the Plan proposals to the District Council (at the next stage in the neighbourhood plan process) it will need to be accompanied by a Basic Conditions Statement. It is suggested that the key positive contributions to sustainable development from the Basic Conditions Statement are picked up in the Introduction section.</p> <p>Suggest that after paragraph 1.8, add “Planning Practice Guidance provides additional guidance on the application and implementation of the Framework’s approach.”</p> <p>Paragraph 1.9 refers to background document “Planning Policy Background and Evidence Base review”. It would be helpful to provide a weblink to the NDP background documents.</p>	Accepted. Amend Plan as suggested.	<p>Amend Plan.</p> <p>Amend 1.3. Insert additional text / new 1.4: “A Steering Group of Parish Councillors and interested local residents was set up in 2014 to oversee the preparation the Plan on behalf of the Parish Council. The Steering Group has met regularly throughout the NDP process and has led on local community consultation and engagement”.</p> <p>Add new para after 1.8. Add “Planning Practice Guidance provides additional guidance on the application and implementation of the Framework’s approach.”</p> <p>Amend 1.9. Add weblink to the NDP background documents.</p>

		2.0		Comment	<p>2.0 Background to the Parish</p> <p>Over time, the information contained in Appendices 2, 3 and 7 will become out of date. It is therefore suggested that they include a date – e.g. “as at June 2016”.</p> <p>This section provides an interesting read about many aspects of the built and natural environment of the Parish and also sets out many of the social statistics from the evidence base. There is, however, considerable detail about the County Council’s Landscape Character Assessment. Whilst it is a matter of choice for the Parish Council as to how much information is presented in the Plan, it is suggested that this section could be shortened by simply providing clear cross references to the evidence base. It may also be helpful to either include a map showing the landscape character areas or inserting a link so that the information can be found if required.</p>	<p>Accepted.</p> <p>The Parish Council considers that inclusion of the information about landscape character areas is useful background and should be retained.</p> <p>Landscape Character Areas are shown on Map 4 but this could be referred to in Section 2.</p>	<p>Amend Plan.</p> <p>Amend Appendices 2, 3 and 7 to include a date, “as at October 2016” and update planning consents / commitments in Appendix 2.</p> <p>Para 2.10 – refer to Map 4 – insert “These are shown on Map 4”.</p>
		3.0		Comment	<p>3.0 Vision and Objectives</p> <p>In essence, the intention of the 6 Objectives appear to be about:</p> <ol style="list-style-type: none"> 1. Protecting the environment 2. Supporting economic development 3. Meeting local housing needs 4. Ensuring provision of a range of facilities for education and recreation 	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p>Objective 3 – delete “affordable and market” and delete second sentence.</p> <p>Objective 5 – insert “and accessible” between “welcoming” and “setting”.</p> <p>Delete “which are accessible” to end.</p>

				<p>5. Encouraging the provision of improvements to the way people move around the Parish</p> <p>6. Encouraging partnership working</p> <p>Objective 3 should say what the Parish wishes the Plan to achieve, not what it does not want i.e. positively worded. It is suggested that the 2nd sentence of Objective is deleted.</p> <p>In relation to Objective 3, it should be noted that it is unlikely to be possible to secure affordable housing on the back of small scale schemes given the current national policy context. As background, in November 2014 the Housing Minister announced in a written statement that for developments of 10 homes or fewer, local councils would not be able to impose affordable housing contributions through section 106 agreements. The South Worcestershire Councils are having to apply SWDP 15 (Meeting Affordable Housing Needs) in light of this. Because Clifton upon Teme is in a Designated Rural Area, it is possible to ask for affordable housing on schemes of 6 or more dwellings, but this will be in the form of a commuted sum to be paid on completion of the scheme, so it would not provide on-site affordable housing. It is also subject to viability considerations.</p> <p>Objective 5 could be made clearer. Is the focus of the Objective about welcoming visitors (tourism) or improving accessibility within and to the Parish?</p>		
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			CL1	<p>Comment</p> <p>4.1 Landscape, Natural Heritage and Green Infrastructure</p> <p>Policy CL1 – Protecting and Enhancing Local Landscape Character</p> <p>Policy CL1 seeks to:</p> <p>(i) Protect locally significant views, and (ii) Ensure that new development takes local landscape character into account in order to protect and enhance the landscape character of Clifton upon Teme.</p> <p>Policy CL1 seeks to address two related, but different, issues. It is therefore suggested that the two issues be covered by separate policies.</p> <p>Protecting Locally Significant Views</p> <p>This policy seeks to protect locally significant views.</p> <p>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.</p> <p>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).</p>	<p>Partially accepted.</p> <p>The Parish Council are happy with the justification provided for each view and have checked that the photographs correspond correctly to the relevant arrows on the maps. The section should be retained in the main text as part of the supporting text / justification for the Policy.</p> <p>The views are from and to areas that lie outside the Proposals Map and if this was amended much of the existing detail would be lost on the smaller scale. Therefore Map 3 should be retained and referred to in the Policy.</p>	<p>Amend Plan.</p> <p><u>Amend Policy CL1</u></p> <p>Amend first paragraph of CL1 to:</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>Insert:</p> <p>“Where a development proposal impacts on an identified Significant View, a Landscape and Visual Impact Assessment or similar study should be carried out to ensure that the landscape is not compromised.”</p>
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				<p>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 photographs taken from viewpoints is a very helpful feature of the Draft Clifton upon Teme Plan providing additional clarity to assist decision making.</p> <p>In relation to the policy seeking to protect locally significant views it is suggested that:</p> <ul style="list-style-type: none">• A clear justification is provided for the protection of each view.• Photographs of the views need to match the direction and extent of the views shown on the maps.• To make the policy more concise, photographs of the proposed significant views could be included in an Appendix. <p>To make the policy more concise and ensure compliance with the policy, the following wording is suggested:</p> <p>Development proposals should respect the Significant Views identified on the Proposals Map and in Appendix X.</p>		
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					<p>Where a development proposal impacts on an identified ‘Significant View’ a Landscape and Visual Impact Assessment or similar study should be carried out to ensure that the landscape is not compromised.</p>		
			CL1	Comment	<p>Protecting and Enhancing Local Landscape Character</p> <p>The policy seeks to ensure that new development takes local landscape character into account in order to protect and enhance the 4 landscape characters covering the parish. Proposals are expected to demonstrate how landscape considerations, in relation to the 4 landscape character areas have been taken into account.</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>SWDP 25 (Landscape Character) says that development proposals must take account of the latest Landscape Character Assessment and its guidelines.</p> <p>There is nothing to prevent policies in neighbourhood plans emphasising the importance of this issue particularly when the impact of future development is demonstrably important to the future vision for the area. There is no prescription in national policy or guidance as to the level of detail necessary. Neither is the issue of</p>	<p>Partially accepted.</p> <p>The Parish Council considers that the detail is useful in that it adds further information and local context to the existing Policy SWDP25.</p> <p>Also it is considered that the identified landscape areas are unlikely to change significantly over the Plan period.</p> <p>The term, “where appropriate” provides sufficient flexibility but the Parish Council considers that even small schemes, such as for one single house can have an unacceptable</p>	<p>Amend Plan.</p> <p>Insert additional text into second part of policy referring to landscape character:</p> <p>“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.”</p>

					<p>landscape character restricted to higher tier level.</p> <p>However, we have the following concerns about the policy as drafted:</p> <ul style="list-style-type: none"> • As the policy to includes design guidelines for each of the 4 local character areas they may become dated when the 2011 Landscape Character Assessment is updated. • Planning Practice Guidance says that policies should be concise and precise. • It may be considered onerous by the examiner for the policy to apply for small or low impact developments. For example, SWDP 25 only requires a Landscape and Visual Assessment on proposals of 10+ dwellings or >1,000 sq m floorspace. • It is not clear how the policy will be applied. <p>To simplify the policy and future-proof it in the event of updated Worcestershire Landscape Character Assessments, it is suggested that the policy be amended along the following lines:</p> <p>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.</p>	<p>impact on a significant view.</p> <p>Therefore the detail should be retained, but the sentence referring to the latest Worcestershire landscape assessment and guidelines should be inserted.</p>	
Biodiversity	33-40			Comment	<p>Biodiversity</p> <p>Pages 33 – 40 include extensive descriptions of wildlife sites and include 5 maps showing</p>	<p>Accepted.</p> <p>Insert new policy as suggested.</p>	<p>Amend Plan.</p> <p>Insert new policy and renumber others.</p>

				<p>the location of sites and networks in the parish.</p> <p>However, there is no policy specifically related to biodiversity and the purpose of the extensive descriptions is therefore unclear.</p> <p>It is suggested that the neighbourhood plan could include a biodiversity-focused policy to make better use of the detailed information provided. That would 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>Any supporting text should provide links to the evidence which supports the policy, rather than lengthy general descriptions of the wildlife sites. It would also be necessary to ensure that sites to which the policy applied are clearly identified on the policies / proposals map.</p> <p>Policy wording could be along the following lines:</p> <p>“Development proposals that impact on local wildlife and habitats identified on Map X should demonstrate how biodiversity will be protected and enhanced”.</p>		<p>Policy CL2 Protecting and Enhancing Biodiversity</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>
		CL2	Comment	Policy CL2 Green Infrastructure	Partially accepted.	No change.

				<p>The supporting text for Policy CL2 describes the Teme Valley & 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>Neighbourhood plans can include policies related to green infrastructure. Any Green Infrastructure policy in the neighbourhood plan should be in general conformity with SWDP 5 (Green Infrastructure).</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>Further, as currently worded, the policy lacks sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications.</p> <p>In light of the above, it is suggested that the protection and enhancement of green infrastructure may be a community aspiration and could be included in Appendix 8 of the Plan which deals with Parish Council actions.</p>	<p>Policy CL2 Green Infrastructure has been amended and improved following representations from Worcestershire County Council.</p>	
	CB1		Comment	Policy CB1 Design Guidance for New Buildings and Extensions in the Clifton upon	Accepted.	Amend Plan.

				<p>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>It is suggested that Map 8 showing the Clifton upon Teme Conservation Area Plan is made larger and clearer.</p> <p>It is suggested that inclusion of the bullet points in paragraph 20.0.6 of the Clifton upon Teme Appraisal and Management Strategy could be used in the Reasoned Justification to better explain the design guidance proposed in Policy CB1.</p> <p>Policy CB1 accurately reflects the wording in paragraph 20.0.0 of the Design Guidance in the Clifton upon Teme Appraisal and Management Strategy, but there may be scope for making some elements of the policy more concise if the reasoning for the policy is explained as suggested above. For example:</p> <p>1. Plot and Density - The current Conservation Area is characterised by tightly packed buildings in The Village, and by</p>	<p>Amend Plan as suggested.</p> <p>Note: “have special regard to the desirability of preserving or enhancing the character or appearance of any Conservation Area.” Is not a basic condition for neighbourhood plans but it is for neighbourhood development orders.</p> <p>In terms of the use of red brick, the Parish Council proposes alternative wording which continues to support a more sympathetic response, although the reference to machine red brick should be deleted.</p>	<p>Amend Map 8 – increase size and clarity.</p> <p>Add additional text to para 4.2.3 from para 20.0.6 of the Clifton upon Teme Appraisal and Management Strategy:</p> <p>“The Clifton upon Teme Appraisal and Management Strategy sets out in para 20.0.6 that <i>“In terms of ongoing and future proposed development within the conservation area, the District Council considers that the character and appearance of the conservation area can best be preserved and enhanced in the following manner:</i></p> <ul style="list-style-type: none"> • <i>Encouraging only new development within the conservation area or its immediate setting where the type, character and design of the development actively enhances the conservation area.</i> • <i>Ensuring that development would not result in the demolition of a building or structure if its loss would be harmful to the character of the conservation area.</i> • <i>Ensuring that any new buildings or extensions do not disturb the overall building density within the conservation area.</i> • <i>Ensuring that any new buildings or extensions reflect the overall pattern of building within the conservation area in size and scale, form, proportion and detailing, ideally using local materials or vernacular techniques. Extensions should always be in materials sympathetic to the main building.</i> • <i>New buildings or extensions should be sited according to the locally prevailing building pattern within the village, and service buildings</i>
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				<p>properties in larger gardens in The Anchorage. It is important that these existing proportions of space, plot division and density in The Village and The Anchorage are respected.</p> <p>Materials – the draft policy proposes that where red brick is employed, modern machine brick should be avoided. It is suggested that this is too prescriptive. It may be acceptable for a Grade I Listed Building, but not really enforceable for Grade II, or other properties within the conservation area.</p>	<p><i>such as garages and outbuildings sited so as to be subsidiary to the main house and not unduly prominent within the street scene.</i></p> <ul style="list-style-type: none"> • <i>Ensuring that any planning application would result in the retention of important views and open spaces, trees and hedgerows or boundary features within the conservation area.</i> • <i>New boundary or dividing walls, railings or hedging should be built from suitable local materials or of native species and be designed into new developments to suit the character of the village."</i> <p>Amend Policy CB1 as suggested:</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"> 1. Plot and Density - It is important that existing proportions of space, plot division and density are respected. 2. Heights - The height of any new development should respect the height of the surrounding buildings and should not exceed two storeys. 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. 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
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							<p>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>
	4.2.4	CB2	Comment	<p>Policy CB2 Building Design Principles for Development outside the Conservation Area and within the Development Boundary</p> <p>Policy CB2 proposes design guidance for development that is outside the Conservation Area, but within the settlement 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 characteristics.</p> <p>Either as part of Policy CB2 or earlier in the document, the neighbourhood plan will need to include a map clearly showing the development boundary (currently Map 11 on page 59).</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</p>	<p>Partially accepted.</p> <p>Amend Plan as suggested for most items.</p> <p>CB2(2) – not accepted. The Parish Council considers that the Policy reads well and should be retained.</p> <p>CB2(3) – not accepted. The Policy “encourages” the use of sustainable materials but does not require it. Worcestershire CC have submitted representations encouraging the strengthening of sustainable building policies. No change.</p>	<p>Amend Plan.</p> <p>Insert additional supporting text to 4.2.4: “It should be noted that Zone 1 (The Village) and Zone 2 (The Anchorage) cover the Conservation Area. Therefore, the design principles in both Policies CB1 and CB2 would apply to the Conservation Area.”</p> <p>Add further justification in relation to lighting and impacts on wildlife in following paragraph: “Clifton upon Teme is noted for its dark skies and lack of street lighting. Planning Practice Guidance (Para 007 Reference ID: 31-007-20140306) notes that “wildlife differs from humans in their sensitivity to light (e.g. they can be affected by very low levels of light) and may be adversely affected in a number of ways The positioning, duration, type of light source and level of lighting are all factors that can affect the impact of light on wildlife.” The dark skies around the Parish are highly valued and security and other lighting should be appropriate, unobtrusive and energy efficient. “</p> <p><u>Amend Policy CB2.</u></p>	

				<p>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>It is noted that Zone 1 (The Village) and Zone 2 (The Anchorage) cover the Conservation Area. Therefore, the design principles in both CB1 and CB2 would apply to the Conservation Area.</p> <p>Policy CB2(1) sets out the matters that should be considered during the design stage. It is suggested that the policy could be made more concise if the 3rd sentence was deleted and / or included in the reasoned justification.</p> <p>CB2(2) serves a purpose in making it 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. It is suggested that the policy could be made more concise if the 1st and 2nd sentences were deleted and / or included in the reasoned justification.</p> <p>CB2(3) – Guidance on energy efficiency in buildings issued by the Secretary of State on 25th March 2015 states neighbourhood plans should not include local standards relating to the technical performance of new dwellings. There does not appear to be any evidence to support CB2(3) and it is considered to be</p>	<p>CB2(4) Not accepted. PPG recognises the importance of careful lighting design in relation to reducing impacts on wildlife. Add further justification to 4.2.4.</p>	<p>Delete “settlement” and replace with “development” (boundary) in second line and insert “as shown on Map 11”.</p> <p>CB2(1) – delete 3rd sentence and add text to 4.2.4.</p>
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					<p>overly prescriptive. It is suggested that CB2(3) is deleted.</p> <p>CB2(4) – It should be noted 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. It is therefore suggested that the Sentences 2 and 3 are deleted.</p>		
			CB3	Comment	<p>Policy CB3 Protecting Historic Farmsteads</p> <p>Farmsteads, and in particular traditional farm buildings of 19th century or earlier date make a fundamental 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>The Worcestershire Farmstead Assessment Framework (2014) provides Guidance to inform and achieve the sustainable development of historic farmsteads, including their conservation and enhancement.</p> <p>Policy CB3 helpfully includes a map showing the location of the historic farmsteads and lists them in Appendix 5.</p>	<p>Accepted.</p> <p>Amend Plan as suggested.</p>	<p>Amend Plan.</p> <p>Amend 4.2.8: Insert:</p> <p>“Farmsteads are also an important aspect of local landscape character (Policy CL1) and Policy CB3 seeks to protect landscape character as well as historical significance.”</p> <p><u>Amend Policy CB3.</u></p> <p>Delete existing text and replace with: “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>In relation to the first paragraph of the policy and part 6, please see earlier comment regarding the need to discern between the use of the words “must “ and should”.</p> <p>It is suggested that the supporting text for Policy CB3 could usefully make a cross reference to the Local Landscape Character (Policy CL1) because it is not just the historic significance that the policy seeks to protect.</p> <p>Policy CB3 reiterates the Design issues from page 13 of the Worcestershire Framework.</p> <p>However, the policy is not concise and could also become out-of-date if the Worcestershire Farmstead Assessment Framework is updated.</p> <p>To future proof the policy and make it more concise, it is suggested that the policy be re-worded along the following lines:</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>		
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	<p>4.2.10 4.2.11</p>	<p>CB4</p>	<p>Comment</p>	<p>Policy CB4 Archaeology</p> <p>Policy CB4 requires all new development to take account of known surface and sub-surface archaeology. In areas of archaeological interest, the policy proposes a series of guidelines that must be adhered to. In planning policy it is important to discern between “must” (a policy requirement) and “should” (to be applied in appropriate circumstances). For policy CB4, it is suggested that “must” is changed to “should”.</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 should 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>As currently worded, Policy CB4 requires all development, irrespective of size and</p>	<p>Partially Accepted.</p> <p>Amend some text as suggested.</p> <p>Paragraph 4.2.10 refers to the HER Parish Search. This includes multiple maps showing sites of archaeological interest and is referenced in a footnote. It is not necessary to reproduce them in the NDP.</p> <p>The third paragraph on 4.2.10 does refer to Clifton upon Teme and should be retained.</p> <p>4.2.11 – If the Policy is to be re-worded, taking out the detail from the GI Strategy, then it would be appropriate to remove reference to the document here and delete the paragraph.</p>	<p>Amend Plan.</p> <p>Delete 4.2.11.</p> <p>Amend Policy CB4 as suggested but retain “must” to avoid weakening the Policy.</p> <p>Amend Policy CB4 to: “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>
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				<p>location, to take account of archaeology and does not say how this should be achieved. It is considered that the policy does not provide a framework by which decisions can be made with a high degree of predictability and efficiency and the requirement may not be proportionate to the likelihood of unidentified heritage assets being discovered.</p> <p>Paragraph 4.2.10 of the reasoned justification refers to an existing assessment of sites of archaeological interest. It is suggested that a map showing sites of known archaeological interest be included in the neighbourhood plan to assist applicants and decision makers.</p> <p>The 3rd paragraph in 4.2.10 and paragraph 4.2.11 do not relate directly to archaeology in Clifton upon Teme and it is suggested that they be deleted.</p> <p>The supporting text for Policy CB4 does not explain how the proposed 5 guidelines for the siting and design of development on sites of archaeological interest have been developed, or by whom.</p> <p>It is suggested that Policy CB4 could be re-worded along the following lines:</p> <p>Development proposals in areas shown on Map X should take account of known surface and subsurface archaeology and ensure</p>	<p>Historic England submitted comments congratulating the Parish Council on the exemplary approach to protecting historic assets in the Plan.</p> <p>CB4 – The Parish Council do not accept with the proposed change of “must” to “should” as this would weaken the policy.</p>	
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					<p>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>		
			CB5	Comment	<p>Policy CB5 Protecting Local Heritage Assets</p> <p>Policy CB5 seeks to protect designated and non-designated heritage assets. The Policy says that non-designated heritage assets will be nominated by the Parish Council 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>However, there is a clear distinction between designated heritage assets (such as listed buildings and conservation areas) and other heritage assets (identified by the local authority).</p> <p>Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers to have special regard to the desirability of preserving a listed building or its setting.</p>	Accepted.	Amend Plan.
						Amend Plan as suggested.	<p>Amend 4.2.12. Delete first sentence and replace with:</p> <p>“In addition to the designated heritage assets in the Parish (which enjoy significant protection provided under national planning policy), there are a number of buildings / assets within the Parish that have local heritage value. These may not be appropriate for national listing, but could be locally listed. The Local List will be designated and maintained by Malvern Hills District Council. It would, however, be appropriate for the Parish Council to nominate non-designated heritage assets for consideration in the MHDC Local List SPD through the neighbourhood plan process. As non-designated heritage assets these buildings would be afforded some protection through local planning policy. The identification of proposed non-designated heritage assets is included in the Appendix 8 Related Actions Identified for the Parish Council.”</p> <p>Appendix 8 –Replace idem 2 action for Parish Council with:</p>

				<p>Section 72(1) of that Act requires decision makers to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. All development proposals relating to designated historic assets are subject to these statutory tests, which affords them a high degree of protection.</p> <p>However, the current wording of Policy CB5 is confusing since it is attempting to deal with both designated historic assets that are protected through national policy, and local heritage assets to be protected through local policy.</p> <p>Since conservation areas, listed buildings scheduled monuments etc and their settings are protected through legislation and national policy it is suggested that reference to designated heritage assets in the policy is not necessary.</p> <p>The aspiration to identify non-designated heritage assets through the neighbourhood plan process is appropriate. However, it is suggested that the aspiration should be included in Appendix 8 which with Parish Council actions. Also, there needs to be robust evidence to justify the heritage assets which are proposed in paragraph 4.2.12 for inclusion in the Malvern Hills Local List SPD.</p>	<p>“The Parish Council will work with Malvern Hills District Council to identify non designated heritage assets in the Parish”.</p> <p><u>Insert New Appendix 10</u></p> <p>Heritage Assets under Consideration for Local Listing</p> <p><i>Clifton upon Teme has many listed buildings and structures, scheduled monuments and a conservation area which are “designated heritage assets” (“designated heritage assets” is the term used to describe heritage that is identified and protected under legislation).</i></p> <p><i>There are still however many buildings, structures and historic designed landscapes which the community values and which make an important contribution to a local sense of history, place and quality of life.</i></p> <p><i>Whilst these heritage assets can be a consideration in planning matters, inclusion of a non- designated heritage asset on a “local list” will give them a greater level of protection by helping to inform decisions on matters that affect them.</i></p> <p><i>The local list will be designated and maintained by Malvern Hills District Council:</i></p> <p><i>The following heritage assets have been identified by the Parish Council as potential</i></p>
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				<p>It is suggested that the supporting text for Policy CB5 acknowledges the designated heritage assets in the parish and the significant protection provided to them under national planning policy. It is suggested that the text then explains that there are a number of buildings / assets within the parish that have local heritage value which may not be appropriate for national listing, but could be locally listed. It is suggested that the supporting text makes it clear that the Local List will be designated and maintained by Malvern Hills District Council. It would, however, be appropriate for the Parish Council to nominate non-designated heritage assets for consideration in the MHDC Local List SPD through the neighbourhood plan process. As non-designated heritage assets these buildings would be afforded some protection through local planning policy. It is suggested that the identification of proposed non-designated heritage assets could be included in the section of the Plan dealing with actions for the Parish Council.</p> <p>It is suggested that the plan include an Appendix titled Heritage Assets under Consideration for Local Listing with supporting text along the following lines:</p> <p><i>Clifton upon Teme has many listed buildings and structures, scheduled monuments and a conservation area which are "designated heritage assets" ("designated heritage</i></p>	<p><i>inclusions on the local list:</i></p> <ul style="list-style-type: none"> - Asset 1 Village pound - Asset 2 Village pump(s) - Asset 3 The New Inn - Asset 4 Royal Observer Corps nuclear monitoring bunker by B4204 opposite Salford Court - Asset 5 Camp House (FORT) (Sapey Common – just inside parish boundary) - Asset 6 Roman fortlet linked to Roman trackway leading to footpath to Church House Farm. - Asset 7 Iron Age/Roman enclosure in field opposite Upper House, Pound Lane. <p><u>Add new Map.</u></p> <p>It is important when proposing local heritage assets to ensure that they meet the necessary criteria. 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.</p>
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				<p><i>assets“ is the term used to describe heritage that is identified and protected under legislation).</i></p> <p><i>There are still however many buildings, structures and historic designed landscapes which the community values and which make an important contribution to a local sense of history, place and quality of life.</i></p> <p><i>Whilst these heritage assets can be a consideration in planning matters, inclusion of a non- designated heritage asset on a “local list” will give them a greater level of protection by helping to inform decisions on matters that affect them.</i></p> <p><i>The local list will be designated and maintained by Malvern Hills District Council:</i></p> <p><i>The following heritage assets have been identified by the Parish Council as potential inclusions on the local list:</i></p> <ul style="list-style-type: none"> • <i>Asset 1</i> • <i>Asset 2</i> • <i>Asset 3 etc</i> <p>It is important when proposing local heritage assets to ensure that they meet the necessary criteria. 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</p>	<p><u>Amend Policy CB5:</u></p> <p>Delete text and replace with:</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>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>
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				<p>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. Policy CB5 (or the relevant Appendix) should therefore include a schedule seeking to justify each of the proposed non-designated heritage assets.</p> <p>It is suggested that Policy CB5 be re-drafted along the following lines:</p> <p>Following adoption by Malvern Hills District Council, proposals requiring consent which affect a building or structure on the Local List must demonstrate how they protect or enhance the heritage asset.</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>		
Housing			Comment	Housing	Not accepted.	No change.

				<p>The section on housing that defines the village of Clifton upon Teme is one of the most important in the Plan. It will determine which other policies then apply when considering development proposals.</p> <p>Whilst the ordering of sections in the Plan is a matter of choice for the Parish Council, it is suggested that the section on housing may be more appropriately located earlier in the Plan.</p>	<p>The order of the chapters was agreed by the Steering group and reflects the high priority placed on landscape character and built heritage and that these should be provided first as part of setting the local context and to inform other policies in the plan.</p>	
		CH1	Comment	<p>Policy CH1 New Housing Development in Clifton upon Teme village</p> <p>Policy CH1 seeks to support small-scale housing development within the village settlement 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</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p><u>Amend Map 12 to show Steps Farm and add date (June 2016).</u></p> <p>Amend Paragraph 4.3.12.</p> <p>Amend 2nd sentence to read “Given the level of commitments in the NDP area it is considered that this policy will allow for further housing growth in addition to existing commitments.”</p>

					<p>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>Map 12 (Existing Housing Commitments) – It is suggested that it may be helpful to show Steps Farm on the map. Map 12 should include a date – e.g. June 2016.</p>		
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					Paragraph 4.3.12. It is suggested that the 2 nd sentence be amended to read “Given the level of commitments in the NDP area it is considered that this policy will allow for further housing growth in addition to existing these commitments, this will allow the NDP to support the growth anticipated in national and strategic planning policy. ”		
Car Parking Standards			CH1	Comment	<p>Car Parking Standards</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 25th March 2015 (http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/) 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>Not accepted.</p> <p>Car parking is a significant issue on the village and this is evidenced through representations made by local people during informal consultations on the emerging Plan. The justification is set in para 4.3.13.</p> <p>Worcestershire County Council did not object to this Policy.</p> <p>The car parking standard therefore should be retained in the Plan.</p>	No change.

					<p>Additional comments related to the proposed car parking policy include:</p> <ul style="list-style-type: none"> • Car parking standards are probably not the solution to concerns about street parking around the village centre and school. • It is probably not appropriate to address car parking in the section of the Plan which deals with the location of new housing. • Reference should be made to Worcestershire County Council Parking Standards. <p>It is suggested that car parking standards may be more appropriately addressed in Appendix 8 which deals with actions for the Parish Council. 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 http://www.worcestershire.gov.uk/download/file/1847/highways_design_guide</p> <p>It is suggested that a car parking policy along the following lines may be appropriate:</p> <p>Proposals must provide adequate parking in accordance with the standards adopted at the time.</p>		
		CH2	Comment	<p>Policy CH2 New Housing Development and Extensions in the Parish’s Countryside Area</p> <p>Policy CH2 seeks to strictly control housing development in the open</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p><u>Amend CH2.</u></p> <p>Delete “and extensions” in the title of the Policy.</p>	

				<p>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>Policy CH2 provides a clear local interpretation of SWDP 2C as it relates to housing development.</p> <p>It is suggested that reference to extensions be deleted from the Policy title because in most cases extensions will be permitted development. It is suggested that Policy CH2 d) and e), which relate to extensions and conversions, be decoupled from CH2 a) to c) – i.e. after CH2 c) there would be separate paragraphs relating to extensions and conversions:</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>For consistency with Policy CH1 it suggested that Policy CH2 add “d) It accords with other</p>	<p>Delete d) and e).</p> <p>Insert new paragraphs:</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>Insert new d):</p> <p>“It accords with other relevant policies in the Clifton upon Teme Neighbourhood Development Plan and South Worcestershire Development Plan”.</p>
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					<p>relevant policies in the Clifton upon Teme Neighbourhood Development Plan and South Worcestershire Development Plan.”</p> <p><u>Car Parking Standards</u></p> <p>It is suggested that car parking standards may be more appropriately addressed in the Infrastructure section of the Plan <u>or</u> Appendix 8 – see comments above.</p>		
Employment and Tourism		4.4.6 and 4.4.7	ET1 ET2	Comment	<p>4.4 Employment and Tourism</p> <p>Paragraph 4.4.6 – It is suggested that “and contributing to the local economy” is deleted – all businesses and residents contribute to the local economy. Also, listing the tourist accommodation and number of rooms is an unnecessary level of detail.</p> <p>Paragraph 4.4.7 – It is suggested that reference to facilities outside the parish of Clifton upon Teme are deleted.</p> <p>Policies ET1 and ET2 seek to be in accordance with paragraph 28 of the Framework.</p>	<p>Partially accepted.</p> <p>Amend text of 4.4.6 as suggested.</p> <p>The Parish Council considers that the text in 4.4.7 should be retained; this is supporting text and not a policy, and deleting it would miss the point that there are attractions nearby which make Clifton upon Teme an attractive B&B etc destination.</p>	<p>Amend Plan.</p> <p>Amend Para 4.4.6 –</p> <p>Delete “and contributing to the local economy” and list of tourist accommodation and number of rooms.</p>
			ET1	Comment	<p>Policy ET1 - Supporting Economic Growth and Protecting Existing Employment</p> <p>Policy ET1 a) and b) support the <u>development</u> of existing and new employment sites,</p>	<p>Accepted.</p> <p>Amend Plan in line with comments.</p>	<p>Amend Plan.</p> <p>First and last paragraphs of ET1 deleted.</p> <p>Para. 2 amended to read:</p>

				<p>subject to no adverse impact on residential amenity, local landscape, the road network and there being good design.</p> <p>Policy ET1 c) and d) support the <u>redevelopment</u> of existing employment sites, subject to the proposals either removing a source of nuisance from a residential area or the buildings being beyond economic repair.</p> <p>The wording in Policy ET1 is currently not particularly clear. The policy says “development of existing and new business (B1), general industrial (B2) and warehousing (B8) sites and premises ...”</p> <p>Our interpretation, is that the policy relates to employment sites with business which currently fall into Use Classes B1, B2 and B8.</p> <p>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>ET1 appears to apply to the whole parish and is arguably more permissive of new employment sites in the open countryside than it is of new housing development. Is this what is intended?</p> <p>Given the desire expressed in other policies is to confine development within the development boundary and prevent encroachment into the countryside, Policy</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"> 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; 2. They do not have an adverse impact on residential amenity and the local road network; and 3. They are of good design and do not have a negative impact on the local landscape. <p>ET1 retitled:</p> <p>Policy ET1 Supporting Economic Growth and Protecting Existing Employment Generating Uses</p> <p>These changes bring ET1 into line with SWDP.</p>
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				<p>ET1 could be seen to be in conflict with other policies.</p> <p>Whilst the intention of ET1 seems to be to encourage small scale businesses, this is not explicit in ET1 a) and b). It is suggested that ET1 could be strengthened if it included “a) They are of a scale appropriate to the location”. The current ET1 a) and b) would then become ET1 b) and c) respectively.</p> <p>Policy ET1 relates to business, general industrial and warehousing (B1, B2 and B8) use classes but is silent about rural enterprise and agriculture. Is this what is intended?</p> <p>Whilst Policy ET2 supports rural diversification, this is only if it is tourism-related.</p> <p>Policy ET1 also seems to be more permissive for the development of new or expansion of existing sites than it is of supporting the re-development of existing sites. <u>Again, is this what is intended?</u></p> <p>It should be noted that an unviable business would not necessarily meet criteria ET1 c) or d). There could, therefore, be a position where buildings are left vacant because it does not meet the two criteria. Is this what is intended?</p> <p>Currently, the supporting text in paragraphs 4.4.8 and 4.4.9 is weak and does not provide a robust justification for Policy ET1.</p>		
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					<p>The policy would benefit from strengthening the reasoned justification. In particular, it would be helpful to explain why the policy focuses on businesses which fall into Use Classes B1, B2 and B8, whether the Plan is equally supportive of employment sites within and outside the development boundary, and whether the policy is equally (or possibly more) supportive of proposals for new employment sites as it is for the expansion of existing sites.</p>		
			ET2	Comment	<p>Policy ET2 Supporting the Growth of Tourism</p> <p>Policy ET2 supports the growth of tourism activities in the parish with few restrictions, other than the development should not generate significant noise or visual intrusion.</p> <p>Paragraph 28 of the Framework says neighbourhood plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.</p> <p>Policy ET2 would apply to the whole parish and is significantly more permissive than SWDP 34 (Tourist Development), SWDP 35 (Visitor Accommodation) and SWDP 36 (Static and Touring Caravans, Chalets and Camping Sites).</p> <p>As currently worded, development proposals would only have to meet one of the criteria in</p>	<p>Delete Policy.</p> <p>These issues are covered by SWDP Policies 34-36.</p>	Policy deleted.

				<p>Policy ET2 to be supported – i.e, expansion of an existing tourism / food / drink business <u>or</u> diversification of an existing rural business <u>or</u> re-use / conversion of an existing building <u>or</u> outdoor facility without large buildings.</p> <p>Unlike SWDP 34, Policy ET2 includes no reference to development being compatible with the physical character of the area, prior consideration being given to the availability of brownfield sites, accessibility by means other than the private car, car parking etc. Unlike SWDP 35, Policy ET2 does not distinguish between development within or outside the development boundary.</p> <p>It should be noted that paragraph 185 of the Framework says that “once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict”.</p> <p>Given that there is a potential conflict between Policy ET2 and both SWDP 34, SWDP 35 and possibly SWDP 36, ET2 would take precedence if adopted.</p> <p>Currently, the supporting text in paragraphs 4.4.10 is weak and does not provide a robust justification for Policy ET2. The policy would benefit from strengthening the reasoned justification.</p>		
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					Issues which it is suggested that further consideration is given to include what use classes does the policy apply to? Does “tourism or food and drink” include pubs, hot food take-aways, restaurants, bottling plants, food manufacture etc? Also, ET2 c) is more supportive of the re-use or conversion of existing buildings for tourism than it is for other businesses in ET1 c) and d). Is this what is intended?		
			ET3	Comment	<p>Policy ET3 Supporting Homeworking</p> <p>Given that homeworking often does not require planning permission, Policy ET3 appears to support the development of office / small workshop space within an existing building, subject to it respecting local character and residential amenity.</p> <p>Policy ET3 has 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>Policy ET3 refers to re-use of an “existing building”, but it does not specify that it should be an existing dwelling. This implies that the change of use of existing buildings which are not currently dwellings will be supported for homeworking. The policy therefore needs to make clear that the policy would support alterations to an existing dwelling.</p>	<p>Accepted.</p> <p>Amend text as suggested.</p> <p>This is not an open door for extension proposals – schemes would be guided by other design policies in the NDP.</p>	<p>Amend Plan.</p> <p>Insert additional text after 4.4.10:</p> <p>“Home working is the practice of working at home rather than in a shop, factory or office and there is a growth in the number of people working from home across the UK and in Worcestershire. The SWDP notes that home working accounts for over 11% of all employment in south Worcestershire (SWDP 8: Providing the Right Land and Buildings for Jobs, Reasoned Justification, para 3). In many cases planning consent will not be required, such as for minor alterations to houses, but larger extensions to provide office accommodation, and development of bespoke live / work units are likely to require planning permission. Policy ET3 applies to working from home where planning permission is required, for instance for live / work units and larger extensions to domestic dwellings.”</p> <p><u>Amend ET3:</u></p> <p>To read:</p>

					<p>It is considered that the policy could be an open door for extension proposals. Is this what is intended?</p> <p>A reasoned justification / supporting text should be provided for Policy ET3. A definition of homeworking may be helpful to explain whether Policy ET3 is supporting general working from home with little change to the character of the dwelling (in which case, planning permission will probably not be required) or is the policy supporting live / work units which can be very different.</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>
		4.5.3	CR1	Comment	<p>4.5 Recreation</p> <p>Policy CR1 Provision and Protection of Community Facilities and Services</p> <p>Policy CR1 seeks to:</p> <ul style="list-style-type: none"> (i) Protect local community facilities and services from a change of use for residential purposes, and (ii) Support the development of new or expanded community facilities and services. <p>The policy would support Objective 4 and possibly Objective 6, but probably not Objective 5.</p> <p>Policy CR1 relates to community facilities and services, but the policy wording currently</p>	<p>Partially accepted,</p> <p>Amend the Policy as suggested.</p> <p>However, para 4.5.3 demonstrates that local people value these services and supports the justification to protect the facilities where the various activities are hosted. The paragraph is in the supporting text and does not form part of the Policy and should be retained.</p>	<p>Amend Plan</p> <p><u>Amend Policy CR1</u></p> <p>Delete existing wording and amend to:</p> <p>“Policy CR1 Protection of Local Community, Retail, Commercial Facilities and Services</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</p>

				<p>includes retail and commercial uses. It is suggested that commercial (and possibly retail) uses should be addressed in Chapter 4 (Employment and Tourism) rather than Chapter 5 (Recreation).</p> <p>Paragraph 4.5.3 provides interesting background information about what the local community like about 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 paragraph 4.5.3 is edited-down.</p> <p>Policy CR1 seeks to achieve 2 separate objectives and it is suggested that they are addressed in separate policies.</p> <p><u>Protection of Local Community Facilities and Services</u></p> <p>Policy CR1 says that the change of use of named community facilities for residential uses will not be supported. This implies that change of use for other purposes could be supported. Is this what is intended?</p> <p>The protection of local community facilities and services currently relates to “shop, public house, post office, school, village hall, nursery or other community facilities.” A map showing the location of the community facilities to be protected should be included in the Plan to provide certainty to providers of the facilities and decision makers.</p>		<p>months and that no sale or let has been achieved during that period.”</p> <p><u>Insert new map showing location of community facilities.</u></p> <p><u>Insert new CR2 and renumber other Policies:</u></p> <p>“Policy CR2 Provision of Buildings for Community Use</p> <p>Development proposals for new or expanded community and recreation facilities will be supported provided that:</p> <ol style="list-style-type: none"> 1. the siting, scale and design respects the character of the surrounding area, including any historic and natural assets; and 2. it is accessible to the community it is to serve; and 3. the impact on the residential amenity is acceptable; and 4. there is no adverse impact on traffic generation; and 5. adequate parking is provided on the site.
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				<p>If the community wishes to protect these facilities, have any of them been proposed as Assets of Community Value?</p> <p>Policy CR1 currently says that before any change of use would be supported it would have to be empty for at least 12 months. This could encourage vacant premises. Also, very prescriptive marketing is proposed, some of which may not be relevant.</p> <p>To address the above concerns, it is suggested that Policy CR1 could be along the following lines:</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>If the facility has demonstrated that it is no longer financially viable, reference to provision for the facility to be provided elsewhere within the settlement boundary would obviously be unnecessary.</p>		
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					<p><u>Provision of Buildings for Community Use</u></p> <p>The current wording of Policy CR1 refers to “retail, commercial and community facilities including the primary school”. It is suggested that development related to commercial uses (other than retail) would be more appropriately addressed in the chapter on employment, not the chapter on recreation.</p> <p>It is suggested that alternative wording relating to provision of community facilities could be along the following lines:</p> <p>Development proposals for new or expanded community and recreation facilities will be supported provided that:</p> <ul style="list-style-type: none"> • the siting, scale and design respects the character of the surrounding area, including any historic and natural assets; • it is accessible to the community it is to serve • the impact on the residential amenity is acceptable; • there is no adverse impact on traffic generation; and • adequate parking is provided on the site. 		
			CR2	Comment	<p>Policy CR2 Local Green Spaces</p> <p>Policy CR2 identifies and seeks to protect 10 Local Green Spaces. The identified Local Green Spaces are:</p>	Noted.	No change.

				<ol style="list-style-type: none"> 1. Village Green; 2. Area around horse chestnut tree/telephone box; 3. Playing Field; 4. Two green areas at top of Manor Road; 5. Green Verge on Kenelm Road; 6. Two green areas in Forge Meadows; 7. Well Ground; 8. Children's Play Area; 9. Village Hall grass area; <p>10. Kenelm Close green space.</p> <p>The Plan includes a map (Map 13) showing the location of the 10 sites. It is accompanied by a very 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'.</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,</p>		
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					<p>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 is provided in Table 2.</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>		
		4.6.2	CI1	Comment	<p>4.6 Infrastructure</p> <p>Policy CI1 Communication Technologies</p> <p>Policy CI1 supports the development and improvement of mobile telecommunication infrastructure providing that it is appropriately located and designed.</p> <p>The objective of CI1 is to ensure that new development in the parish is supported by broadband and mobile phone services. However, Policy CI1 appears to address mobile telecommunication infrastructure only. It is suggested that Policy CI1 could be</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p>Insert additional text after para 4.6.2:</p> <p>“The SWDP Policy SWDP 26 notes in para 3 of the supporting text that “a digitally accessible south Worcestershire will allow people an enhanced freedom of choice about where and how they work, how they interact with services and facilities and how they promote and operate their businesses. A connected community is a more sustainable one, as it represents the opportunity for a reduction in car-based commuting and a commensurate reduction in carbon outputs and traffic congestion. It also</p>

				<p>strengthened by adding policy wording along the following lines:</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>Currently, the supporting text in paragraph 4.6.2 is weak and does not provide a robust justification for Policy CI1. The policy would benefit from strengthening the reasoned justification.</p>		<p>promotes the idea of south Worcestershire as a suitable place for high technology activities and employment to take place.”</p> <p><u>Amend Policy CI1</u></p> <p>Insert additional text to Policy:</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>
		CI2	Comment	<p>Policy CI2 Supporting Improvements in Traffic Management, Signage and Street Furniture</p> <p>Policy CI2 seeks to:</p> <ul style="list-style-type: none"> (i) Encourage various traffic management measures in the parish, and (ii) Ensure that the design of new street furniture and signage is appropriate to the area. <p><u>Traffic Management</u></p>	<p>Noted and partially accepted.</p> <p>Refer to Worcestershire County Council comments.</p> <p>The Policy and Appendix 8 have been amended in line with representations made by the Highways</p>	<p>Amend Plan.</p> <p><u>Amend Appendix 8 Point 7</u> – Replace with suggested wording:</p> <p>“The Parish Council will support infrastructure improvements in the parish, particularly those which address local traffic issues including existing traffic calming, HGV restrictions and commuter traffic.”</p>

				<p>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 4.6.3 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 therefore aspirations of local people and it is suggested that should be included in Appendix 8 of the Plan that deals with actions for the Parish Council.</p> <p>When it comes to new development the objectives are likely to be about promoting adequate connectivity, encouraging use of sustainable transport and provision of adequate parking. The Plan should therefore concentrate on these matters.</p> <p>It is suggested that the Infrastructure chapter could provide a link to Appendix 8 along the following lines:</p> <p><i>The Parish Council will support infrastructure improvements in the parish, particularly those which address local traffic issues including existing traffic calming, HGV restrictions and commuter traffic.</i></p>	<p>Authority. The County Council provided some new wording for the first part of the Policy but did not suggest changes to the wording relating to signage.</p> <p>Amend Appendix 8.</p>	
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					<p><u>Signage</u></p> <p>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 considered that this issue would 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>		
			CI3	Comment	<p>Policy CI3 Supporting Renewable and Low Carbon Energy Schemes and Technologies</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>The title of Policy CI3 refers only to low carbon energy and should be amended to relate to renewable and low carbon energy to accord with national guidance.</p>	<p>Accepted.</p> <p>Refer to comments submitted by Worcestershire County Council – the Policy has been amended and strengthened in relation to supporting sustainable development.</p> <p>Para 4.6.5 has been amended and strengthened in response to comments about fuel poverty from the County Council.</p>	<p>Amend Plan.</p> <p>Amend Title of CI3 as suggested to: “Policy CI3 Supporting Renewable and Low Carbon Energy Schemes and Technologies”</p> <p>Insert further text after para 4.6.5:</p> <p>“Clifton upon Teme is supportive of renewable and low carbon energy. In particular, the Parish is keen to attract renewable and low carbon energy schemes that demonstrate evidence of community consultation at early stages in the development – especially when this leads to a tangible benefit to the community. This could, for example, be in the form of allowing community investment in the scheme or developer investment in other low carbon initiatives in Clifton upon Teme. The Parish Council will seek to identify potential schemes and invite interest from private funders.”</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.</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</p>		
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				<p>Neighbourhood Plan has not identified sites suitable for wind energy.</p> <p>Currently, the supporting text in paragraph 4.6.5 is weak and does not provide a robust justification for Policy CI1. The policy would benefit from strengthening the reasoned justification.</p> <p>Given that the community aspiration is to encourage community-led initiatives, it is suggested that the issue would be more appropriately included in Appendix 8 of the Plan that deals with actions for the Parish Council. It is suggested that the Infrastructure chapter could provide a link to Appendix 8 along the following lines:</p> <p><i>Clifton upon Teme is supportive of renewable and low carbon energy. In particular, the parish is keen to attract renewable and low carbon energy schemes that demonstrate evidence of community consultation at early stages in the development – especially when this leads to a tangible benefit to the community. This could, for example, be in the form of allowing community investment in the scheme or developer investment in other low carbon initiatives in Clifton upon Teme. The Parish Council will seek to identify potential schemes and invite interest from private funders.</i></p>		
				5.0 Next Steps		Update.
	6.1		Comment	6.0 Monitoring and Review	Accepted.	Amend Plan.

					<p>To reflect Planning Practice Guidance, it is suggested that paragraph 6.2 be amended as follows:</p> <p>When new issues are identified, or policies are found to be out of date, or in need of change, for example due to changing national or strategic planning policy, the Parish Council, in consultation will work with Malvern Hills District Council, may decide to formally review and update the NDP, or part of it.</p>	Amend text as suggested.	Amend 6.2 to: “When new issues are identified, or policies are found to be out of date, or in need of change, for example due to changing national or strategic planning policy, the Parish Council, in consultation with Malvern Hills District Council, may decide to update the NDP, or part of it.”
	App 7			Comment	<p>In time the list of local businesses will become out-of-date. It is suggested that Appendix 7 says “local businesses include ...” and that a date is provided, e.g. “as at June 2016”.</p>	Accepted.	<p>Amend Plan.</p> <p>Amend Appendix 7.</p> <p>Insert “Local Employers and Businesses include:”</p> <p>And “as at June 2016”.</p>