

Table 3

Consultation Responses from Consultation Bodies, Other Groups and Residents

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision/ Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NP
<p>15. Historic England</p> <p>peter.boland @HistoricEn gland.org.uk</p>	All			Support	<p>Dear Ms Hill</p> <p><b>CLIFTON UPON TEME NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION.</b></p> <p>Thank you for the invitation to comment on the Clifton upon Teme Draft Neighbourhood Plan. Historic England is extremely supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the use of historic characterization to provide a context and a sound evidence base for well thought out Plan policies. In this and other respects Historic England considers that the Plan takes an exemplary approach to the historic environment. It is also clear that full and effective use has been made of the professional advice available through the relevant local authorities, particularly the Worcestershire Historic Environment Record (HER).</p>	<p>Noted with thanks.</p> <p>Insert note advising that characterisation workshop undertaken for the Parish by Worcestershire Archive and Archaeology Service was made possible through Historic England grant funding.</p>	<p>Amend Plan.</p> <p>Insert footnote to para 4.2.4 at end of first sentence:</p> <p><b>“Note - The characterisation workshop undertaken for the Parish by Worcestershire Archive and Archaeology Service was made possible through Historic England grant funding.”</b></p>

				<p>The recognition in the Plan of the importance of the local historic environment is highly commendable and Historic England strongly support that view. The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains, farm buildings and important views is equally to be applauded. Those who have clearly worked extremely hard in drafting the Plan are to be congratulated.</p> <p>Overall Historic England considers that the Clifton upon Teme Draft Neighbourhood Plan exemplifies “constructive conservation” and constitutes a very good example of community led planning.</p> <p>On a minor point we would welcome an acknowledgement in the Plan that the characterisation workshop undertaken for the Parish by Worcestershire Archive and Archaeology Service was made possible through Historic England grant funding. I hope you find this advice helpful. If you have any queries please do not hesitate to contact me.</p> <p>Yours sincerely,</p> <p>Peter Boland Historic Places Advisor</p>		
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<p><b>16.</b> <b>Worcester</b> <b>shire County</b> <b>Council</b> <b>Natasha</b> <b>Friend</b> <b>Principal</b> <b>Planner</b></p>	<p>All</p>			<p>Comment</p>	<p><b>From:</b> Natasha Friend, Principal Planner</p> <p><b>Subject:</b> Consultation from Clifton upon Teme Parish Council in respect of the Clifton upon Teme Draft Neighbourhood Development Plan</p> <p><b>Recommendation:</b> that these comments are taken into account in the development of the Clifton upon Teme Neighbourhood Development Plan</p> <p><b>Summary of Worcestershire County Council response:</b></p> <p>In respect of the departments contributing to this advice (namely Strategic Planning and Environmental Policy, Waste and Minerals Planning, Sustainability, Transport and in the Worcestershire County Council role as a Lead Local Flood Authority (LLFA), Worcestershire County Council officers have no objection to this plan, however, we would strongly recommend that the Clifton Upon Teme Neighbourhood Plan takes account of both the Waste Core Strategy and Minerals Local Plan as detailed below. The comments of contributing departments referred to below are intended to help improve the sustainability of the proposal and to direct the applicants towards best practice. Any departments not included within this response may choose to comment and/or object separately.</p>	<p>Noted.</p>	<p>No further changes in addition to those in response to detailed comments below.</p>
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				<p><b>Location:</b> Clifton upon Teme</p> <p><b>Introduction</b></p> <p>Thank you for consulting Worcestershire County Council on the consultation above. Please find below officer comments.</p> <p>This response comprises officer only comments from Strategic Planning and Environmental Policy, Waste and Minerals Planning, Sustainability, Transport and in the Worcestershire Council role as a Lead Local Flood Authority (LLFA).</p>		
			CL2	<p><b>Green Infrastructure</b></p> <p>It is great to see that this Neighbourhood Plan builds on the county-wide GI evidence base and uses this GI approach in relation to new developments in the neighbourhood area.</p> <p>We welcome the Draft Policy CL2 Green Infrastructure. However, we would encourage a slightly more comprehensive approach to GI. The first policy sentence could potentially state:</p> <p>Where appropriate, new development should ensure the protection and enhancement of the existing green infrastructure assets and creation of multifunctional green infrastructure networks as part of masterplanning, landscaping and building design. These networks should contribute to</p>	<p>Accepted.</p> <p>Amend Plan using text as suggested.</p>	<p>Amend Plan.</p> <p>Amend Policy CL2. Delete first sentence and replace with:</p> <p><b>“Where appropriate, new development should ensure the protection and enhancement of the existing green infrastructure assets and creation of multifunctional green infrastructure networks as part of masterplanning, 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.”</b></p>

					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.		
	Exec Summary			Comment	<p><b>Waste &amp; Minerals</b></p> <p>We are disappointed to note that the Waste Core Strategy and Minerals Local Plan are not recognised in the draft Neighbourhood Plan as part of the adopted Development Plan for the area, as per the comments we provided in response to the designation of the area in June 2013.</p> <p>Whilst it is true that as County Matters, minerals and waste developments are "excluded development" under Section 61 of the Localism Act, meaning that the neighbourhood plan and any development orders are not be able to make provision for minerals or waste development in that area, it is important that the Neighbourhood Plan is in conformity with the development plan as a whole, and does not conflict with the provisions of the Waste Core Strategy or Minerals Local Plan.</p> <p>To remedy this, a number of changes are required to consistently refer to the Development Plan as a whole.</p> <p>The third paragraph of the Executive Summary should be amended to read: "The</p>	Accepted.	Amend Plan.
						Amend Plan using text as suggested.	<p>Amend Executive Summary, third paragraph to read:</p> <p><b>"The NDP is a statutory (legal) document and has to be in general conformity with local strategic planning policies set out in the Development Plan and to take account of national planning policy set out in the National Planning Policy Framework (NPPF). The Development Plan for the NDP area consists of the South Worcestershire Development Plan (SWDP), the Worcestershire Waste Core Strategy and the saved policies of the County of Hereford and Worcester Minerals Local Plan. A new Minerals Local Plan is being prepared for Worcestershire and is expected to be adopted in 2018."</b></p>

					<p>NDP is a statutory (legal) document and has to be in general conformity with local strategic planning policies set out in the Development Plan (footnote) South Worcestershire Development Plan (SWDP) and to take account of national planning policy set out in the National Planning Policy Framework (NPPF)." The footnote should read:</p> <p>"The Development Plan for the NDP area consists of the South Worcestershire Development Plan (SWDP), the Worcestershire Waste Core Strategy and the saved policies of the County of Hereford and Worcester Minerals Local Plan. A new Minerals Local Plan is being prepared for Worcestershire and is expected to be adopted in 2018."</p>		
		1.2		Comment	<p>Paragraph 1.2 should be amended to read: "Neighbourhood Planning is a central government initiative introduced by the Localism Act 2011 and recognised in the National Planning Policy Framework (NPPF) in March 2012. The aim of the legislation is to empower local communities to use the planning system to promote appropriate and sustainable development in their area. Neighbourhood Development Plans (NDPs) must have regard to national policies and be in general conformity with strategic policies in the Local Development Plan – the recently adopted South Worcestershire Development Plan (SWDP) 2006 - 2030."</p>	<p>Noted.</p> <p>This reads the same as the existing text so no change required.</p>	No change.

		1.7		Comment	Paragraph 1.7 should be amended to read: "The NDP must have regard to national policies and be in general conformity with strategic policies in the Local Development Plan – the South Worcestershire Development Plan <sup>1</sup> ." The footnote could include links to <a href="http://www.worcestershire.gov.uk/planning">http://www.worcestershire.gov.uk/planning</a> for the Waste Core Strategy and Minerals Local Plan.	Noted and partially accepted.  Para 1.7 reads eh same as the text suggested but the footnote could include a reference to the Waste Core Strategy.	Amend Plan.  The footnote should include:  <b>"See also the Waste Core Strategy and Minerals Local Plan see <a href="http://www.worcestershire.gov.uk/planning">http://www.worcestershire.gov.uk/planning</a>"</b>
		1.9		Comment	Paragraph 1.9 should be amended to read: "The current local planning policy framework for the neighbourhood plan area <del>comprises</del> includes the recently adopted South Worcestershire Development Plan (SWDP). The South Worcestershire Development Plan was prepared jointly by Malvern Hills District Council, Worcester City Council and Wychavon District Council and will guide development in the area up to the year 2030. The Clifton upon Teme NDP will cover the period to 2030, the same as the South Worcestershire Development Plan. A summary of the national and local planning policy context relevant to Clifton upon Teme is provided in the background document Planning Policy Background and Evidence Base review which forms part of the NDP evidence base."	Accepted.  Amend Plan using text as suggested.	Amend Plan.  Amend Paragraph 1.9 first sentence to read: <b>"The current local planning policy framework for the neighbourhood plan area <u>includes</u> the recently adopted South Worcestershire Development Plan (SWDP)."</b>
					We have concerns that the Planning Policy Background and Evidence Base document also does not sufficiently consider the	Noted.	No change to the NDP.

					<p>implications of the Waste Core Strategy or the Minerals Local Plan.</p> <p>Section 3.0 of that document refers briefly to the Worcestershire Minerals Core Strategy 2012 – this should be the <i>Waste Core Strategy</i> – and to the Minerals Local Plan 1997, but does not give any analysis of the implications of their policies for the Neighbourhood Plan. We would refer you to the comments we provided in response to the designation of the area in June 2013 as the starting point for such analysis.</p>	<p>The Planning Policy Background and Evidence Base was used to inform the development of the Draft NDP.</p> <p>At Submission Stage the more relevant document is the Basic Conditions Statement and this will refer to the local strategic planning context in more detail.</p>	
		4.0.1		Comment	<p>Paragraph 4.0.1 of the draft NDP states that "The policies in this section are designed to be applied when Malvern Hills District Council consider any planning application submitted within the designated NDP area". Whilst this is true, Worcestershire County Council also has a role as County Planning Authority, determining planning applications for mineral and waste developments, as well as the County Council's own developments such as for schools and infrastructure. In addition, we think this is a missed opportunity to encourage developers to consider the policies as they develop proposals. Paragraph 4.0.1 could therefore be amended to read:</p> <p>"The policies in this section are designed to guide developers and be applied when</p>	<p>Accepted.</p> <p>The text should also reflect the fact that the County Council may be the local planning authority for certain matters such as buildings for education and other county functions.</p> <p>Amend Plan.</p>	<p>Amend Plan.</p> <p>Amend Paragraph 4.0.1 first sentence to read:</p> <p><b>"The policies in this section will be applied in the consideration of any planning applications submitted within the designated NDP area."</b></p>



					Malvern Hills District Council consider any in the consideration of any planning applications submitted within the designated NDP area. These policies are necessarily wide ranging in their scope and represent the community's aspiration for delivering sustainable development within their parish. "		
			CH1 c)	Comment	<p>We do not think part c of Policy CH1 is necessary, but if kept Policy CH1 should be amended to read:</p> <p>"New housing development within the Clifton upon Teme village development boundary (Map 11) will be considered favourably if: a) It is infill development on previously developed land, or is the conversion, re-use or extension of an existing building; and</p> <p>b) It does not lead to the loss of community or recreation facilities or local employment opportunities; and c) It accords with other relevant policies of the Clifton upon Teme Neighbourhood Development Plan and South Worcestershire Development Plan as a whole. "</p>	<p>Accepted.</p> <p>This change has already been made in response to comments from Malvern Hills District Council.</p>	No further change.
				Comment	<p><b>Waste Core Strategy</b></p> <p>Policy WCS 5 (Landfill and disposal) of the Waste Core Strategy seeks to ensure that waste is managed as a resource in accordance with the waste hierarchy. Landfill and disposal of waste should be a last resort. This is relevant to the development of neighbourhood plans in relation to excavated</p>	<p>Accepted.</p> <p>Amend Plan using text as suggested.</p>	<p>Amend Plan.</p> <p>Insert additional supporting text before Policy CL1:</p> <p><b>"At Regulation 14 consultation stage, Worcestershire County Council submitted comments referring to the Waste Core Strategy; "excavation activities, a normal part of the construction process, can result in considerable</b></p>

				<p>materials from development.</p> <p>The explanatory text supporting policy WCS 5 states that "excavation activities, a normal part of the construction process, can result in considerable arisings of subsoils. In some cases, this type of waste can usefully be re-used for purposes such as... landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation. However, <b>to prevent inappropriate development, these kinds of proposals will be considered against Policy WCS 5: Landfill and disposal.</b> The decision on whether proposals are a form of disposal will be guided by the Environment Agency's advice (currently set out in "Defining Waste Recovery: Permanent Deposit of Waste on Land" Regulatory Guidance Series No RGN13)". (<a href="https://www.gov.uk/government/publications/rgn-13-defining-waste-recovery-permanent-deposit-of-waste-on-land">https://www.gov.uk/government/publications/rgn-13-defining-waste-recovery-permanent-deposit-of-waste-on-land</a>)</p> <p>We consider that this could be strengthened by reference within the Neighbourhood Plan requiring developers to specifically address the disposal of excavated materials arising from development, perhaps as part of Policy CL1 or CB1 and CB2.</p>		<p><i>arisings of subsoils. In some cases, this type of waste can usefully be re-used for purposes such as landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation".</i> The County Council advised in their submission that this could be strengthened by reference within the Neighbourhood Plan requiring developers to specifically address the disposal of excavated materials arising from development."</p> <p>Amend Policy CL1.</p> <p>Add further text at the end of Policy CL1:</p> <p><b>"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."</b></p>
		CB2	Comment	<p>In addition, Waste Core Strategy policy WCS 17 requires new development to make appropriate provision for occupiers to separate and store waste for recycling and recovery. We consider that policies CB1 and</p>	<p>Accepted.</p> <p>Amend Plan using text as suggested.</p>	<p>Amend Plan.</p> <p>Insert additional text to Policies CB1 and CB2:</p>

					CB2 could include a requirement for integration of bin stores and recycling facilities to minimise the impact of domestic paraphernalia on the character of the parish.		<b>“Development proposals are required to provide integrated bin stores and recycling facilities to minimise visual impact”.</b>
			CL2	Comment	<p><b>Flooding</b></p> <p>We note that SuDS are mentioned briefly in the plan, however we recommend the Neighbourhood Plan elaborating on this more and be more specific asking for SuDS to be considered on all developments (regardless of size). The Neighbourhood Plan could go on to specify that at surface level SuDS provide the most opportunity for multiple benefits and should be considered before below ground SuDS.</p> <p>The Neighbourhood plan needs also to detail the need to ensure the maintenance of SuDS for the lifetime of the development.</p>	<p>Accepted.</p> <p>Amend Plan using text as suggested.</p>	<p>Amend Plan.</p> <p>Amend Policy CL2.</p> <p>Insert additional wording at the end of the Policy:</p> <p><b>“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.”</b></p>
			CI3	Comment	<p><b>Sustainability</b></p> <p><b>Low Carbon Energy and New Technologies</b></p> <p>We are pleased that the Parish Council has sought to include sustainability and low carbon technologies into the Neighbourhood Plan. However, we have the following comments which can be used to justify Policy CI3 and strengthen sustainability within the Plan.</p> <p>The Neighbourhood Plan could be more ambitious around sustainability. They note</p>	<p>Noted.</p> <p><b>The Written Statement to Parliament: Planning Update, 25 March 2015</b> sets out that Local planning authorities and qualifying bodies preparing neighbourhood plans should not</p>	<p>Amend Plan.</p> <p>Insert additional supporting text after Policy CI3:</p> <p><b>“Worcestershire County Council submitted representations at Regulation 14 consultation stage, advising that the NDP could be strengthened in terms of promoting sustainability. Ultra-energy efficient building design should make good financial sense as well as reducing carbon emissions. Good thermal performance of buildings will significantly help with fuel poverty rates, ensuring that local</b></p>

				<p>that 'sustainable building design is largely covered in Building Regulations'. However, Building Regulations only covers basic building design in terms of sustainability and energy efficiency and does not go far enough, so by being more ambitious and promoting sustainable building design, both residents and the environment will benefit.</p> <p>The Neighbourhood Plan could look to further Building Regulations by pushing for above – standard energy efficiency measures. We would encourage the Neighbourhood Plan to consider the benefits for residents by promoting a high standard of energy efficient homes and reflect that within the Neighbourhood Plan. The Government has committed to reducing CO2 emissions by 80% by 2050, and as 70% of building stock will still be standing at that time, improving the energy efficiency of existing housing stock as well as new developments is important.</p> <p>Ultra-energy efficient building design should make good financial sense as well as reducing carbon emissions.</p> <p>Developments can be encouraged to promote energy efficiency and for commercial or public buildings to comply with BREEM's Excellent or Outstanding rating. Non-residential buildings can be subject to a Neighbourhood Plan's local requirements, unlike housing developments.</p> <p>Good thermal performance of buildings will</p>	<p>set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code.</p> <p>However the Parish Council would like to support sustainable design, and energy efficiency measures to tackle fuel poverty.</p>	<p>residents are able to live in warm, healthy homes which they can afford to heat.</p> <p><b>Fuel poverty is a significant issue across Worcestershire. Worcestershire now has more than one in ten households in fuel poverty. Fuel poverty is particularly prevalent in areas of the county without mains gas or where there are older properties that are difficult or expensive to insulate. This can have an extremely adverse effect on both the physical and mental well-being of residents, as well as development in children and young adults.</b></p> <p><b>Fuel poverty results from a number of factors, including high energy prices and under occupation, but the main reasons are low income and energy inefficient housing. As fuel prices increase, the level of fuel poverty in the County is liable to increase. Since 2006 household heating bills have increased by £500 per year for a typical home (Committee on Climate Change report 'Household energy bills - impact of meeting carbon budgets').</b></p> <p><b>Tackling fuel poverty is strongly linked to energy efficiency in homes and to community energy generation. A new Fuel Poverty Strategy for Worcestershire is currently being drafted (July 2016).</b></p> <p><b>The latest data available is for 2014. For Malvern, it is thought there were 14.1% of household considered to be fuel poor. This was an increase on the previous year of 1.5%. Malvern Hills has the highest levels of fuel</b></p>
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				<p>significantly help with fuel poverty rates, ensuring that local residents are able to live in warm, healthy homes which they can afford to heat.</p> <p>Fuel poverty is a significant issue across Worcestershire. Worcestershire now has more than one in ten households in fuel poverty. Fuel poverty is particularly prevalent in areas of the county without mains gas or where there are older properties that are difficult or expensive to insulate. This can have an extremely adverse effect on both the physical and mental well-being of residents, as well as development in children and young adults.</p> <p>Fuel poverty results from a number of factors, including high energy prices and under occupation, but the main reasons are low income and energy inefficient housing. As fuel prices increase, the level of fuel poverty in the County is liable to increase. Since 2006 household heating bills have increased by £500 per year for a typical home (Committee on Climate Change report 'Household energy bills - impact of meeting carbon budgets').</p> <p>We would recommend that fuel poverty, the impact of fuel poverty and measures that can be taken, are considered in the neighbourhood plan. Tackling fuel poverty is strongly linked to energy efficiency in homes and to community energy generation.</p> <p>A new Fuel Poverty Strategy for</p>	<p>Therefore it is proposed to strengthen Policy CI3 to encourage sustainable design and energy efficiency measures in new buildings as suggested by the County Council.</p> <p>The County Council subsequently provided further information for inclusion in the supporting text in relation to Clifton upon Team.</p>	<p><b>poverty in Worcestershire with the percentage sitting above the Worcestershire (10.8%) and West Midlands (12.1) figures. The data can be refined down to groups of around 800 houses called Lower Super Output Areas (LSOA). For the LSOA area covering Clifton upon Teme, 21.8% of households are considered to be fuel poor and therefore struggle to heat their home affordably.</b></p> <p><b>Fuel poverty is now measured using the Low income, High Cost definition. Under the LIHC indicator, a household is considered to be fuel poor if:</b></p> <ul style="list-style-type: none"> <li>• they have required fuel costs that are above average (the national median level)</li> <li>• were they to spend that amount, they would be left with a residual income below the official poverty line</li> </ul> <p><b>The main fuel type for this area is oil. Households are over 2km from the nearest gas connection.</b></p> <p><u>Insert new Policy CI4.</u></p> <p><b>“Policy CI4 Energy Efficiency and Tackling Fuel Poverty</b></p> <p><b>“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</b></p>
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					Worcestershire is currently being drafted (July 2016). We are able to provide details on the fuel poverty rates in the neighbourhood plan area if requested.		<b>warm, healthy homes which they can afford to heat.”</b>  <u>Amend Chapter Heading to “Infrastructure and Energy”</u>
			CI3	Comment	<p><b>Policy CI3 Supporting Low Carbon Energy Schemes and Technologies</b></p> <p>We strongly support this policy within the Neighbourhood Plan and commend the inclusion of this.</p> <p>Governmental legally-binding targets are for 15% of the UK's energy consumption to be from renewable sources by 2020.</p> <p>The NPPF states that local planning authorities “should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources...They should support community-led initiatives for renewable and low carbon energy”.</p> <p>Worcestershire County Council is keen to see community energy schemes develop and to encourage such schemes. See <a href="http://www.worcestershire.gov.uk/info/20235/sustainability/1167/community_renewable_energy">http://www.worcestershire.gov.uk/info/20235/sustainability/1167/community_renewable_energy</a>. The Department for Energy and Climate Change's Community Energy Strategy should be considered (<a href="https://www.gov.uk/government/publications/community-energy-strategy">https://www.gov.uk/government/publications/community-energy-strategy</a>).</p> <p>Community energy schemes will improve</p>	Noted.	No change.

				<p>energy security, meaning that a community is not fully dependent on outside energy sources, can generate vital revenue for a community which can be used for other community projects and initiatives, and will reduce the carbon emissions from a community.</p> <p>Community renewable energy could therefore be supported within the neighbourhood plan. This could consider low carbon energy sources, (such as renewable energy e.g. ground, air or water source heat, solar PV etc.), and opportunities for community energy generation etc., perhaps within the neighbourhood's policy on design of new buildings.</p> <p>For development in areas of the parish that are off gas grid in particular, renewable energy may make good financial sense as well as reducing carbon emissions. Renewable electricity and renewable heat could be considered.</p> <p>Community energy generation can be a range of options from a community renewables scheme e.g. Solar PV on a community building to a district heat network; a shared heating system for a new development.</p> <p>A statement related to the community's stance on larger scale renewable energy generation might also be relevant.</p> <p>Whilst the SWDP Policy 27 is mentioned, it</p>		
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					may be worth outlining that a full 10% of energy required by new developments must come from low carbon or renewable sources, so this technology is required in development.		
			CH1	Comment	<p><b>Policies CH1 and CH2</b></p> <p>These policies regarding should also reflect a desire for sustainable building design.</p>	Not accepted.	No change.
			CI2	Comment.	<p><b>Transport</b></p> <p>In relation to Policy CI2, which includes the following:</p> <ul style="list-style-type: none"> <li>• Introduction of 20 mph speed limits and traffic calming where appropriate</li> <li>• Pedestrian crossings</li> <li>• Entrance gates to the village</li> </ul> <p>20mph zones are generally ineffective on A and B roads unless there is significant natural surveillance, camera enforcement or physical measures to naturally enforce lower speed limits. Recent evidence suggests that entrance gates, whilst not particularly expensive, are no longer that effective at reducing traffic speeds any more as drivers have got used to them and so ignore them.</p> <p>To give this plan a bit more longevity, we</p>	<p>Accepted.</p> <p>Amend Policy CI2 as suggested.</p> <p>However it should be noted that there is an A road between Tenbury Wells and Worcester (A443).</p>	<p>Amend Plan.</p> <p>Amend Policy CI2.</p> <p>Delete first paragraph and the 3 bullet points, and replace with:</p> <p><b>“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.”</b></p> <p>Amend Appendix 8 Actions for the Parish Council.</p> <p>Add additional text to Point 7: <b>“In particular, the following measures will be considered:</b></p>



					<p>would suggest the following alternative policy statement: Clifton upon Teme Parish Council will support measures which 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>The B4204 that runs through the village performs a strategic accessibility function, being the fastest and most direct route between Tenbury Wells and Worcester. Any proposal to reduce speed limits to 20mph through Clifton-upon- Teme would increase overall journey times between Tenbury and Worcester, resulting in a severance effect which Worcestershire County Council could not support on socio-economic grounds. With regards to the appendix, a couple of measures that could be considered include the following:</p> <ul style="list-style-type: none"> <li>• <b>Removal of the centre-line through the village</b> – This simple measure visually narrows the road, slowing down traffic;</li> <li>• <b>Cohortisation of on-street car parking</b> – Marked out on-street car parking areas can visually narrow the road, creating <i>de-facto</i> chicanes which act to slow down traffic;</li> </ul>		<ul style="list-style-type: none"> <li>• <b>Removal of the centre-line through the village</b> – This simple measure visually narrows the road, slowing down traffic;</li> <li>• <b>Cohortisation of on-street car parking</b> – Marked out on-street car parking areas can visually narrow the road, creating <i>de-facto</i> chicanes which act to slow down traffic.”</li> </ul>
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	All			Comment	<p><b>Health</b></p> <p>The Directorate of Public Health at Worcestershire County Council welcomes the opportunity to comment on the Clifton upon Teme Neighbourhood Plan.</p> <p>It is increasingly recognised that the places and spaces where we live/work can have an impact on health and wellbeing and that an individual's actions to improve their lifestyle or health status are likely to be influenced by the environmental and socio-economic context within which they take place.</p> <p>The design of the built environment can have a significant impact on physical and mental health and how people perceive their environments. The location, density and mix of land uses can have wide-reaching implications on how individuals live their lives; it can affect user experience of access to and provision of key community facilities such as public services, employment opportunities, healthy food choices and parks and green spaces. How areas and buildings connect to one another through street layout, footpaths, cycleways and open spaces can impact on mental health and well-being and the amount of physical activity people undertake. As an example, well connected, attractive, safe, and legible streets, footpaths and cycle networks can encourage more people to use them, promote physical activity and consequently reduce the frequency of car usage.</p>	Noted.	No change.
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					<p>This is recognised through the national planning policy. The 2012 National Planning Policy Framework (NPPF) states that <i>the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities</i> (NPPF, Para 8.69).</p> <p>The National Planning Practice Guidance (PPG) goes on to state that health, wellbeing and health infrastructure must be considered in local and neighbourhood plans. Decision-making should promote physical activity, consider health infrastructure implications of proposed development, promote access to healthy food, and consider pollution and other hazards which might impact on human health. The PPG also recognises that Health Impact Assessments may be a useful tool in identifying significant impacts on the health of local people as a result of new developments.</p> <p>The Localism Act 2011 gives new freedoms to local areas and includes provision for neighbourhood planning. This offers opportunity for the local communities to take positive action to improve health and wellbeing by identifying new facilities that are required and improving the design of development sites and new buildings</p>		
			Addition al Policy	Comment	We would encourage the inclusion of health and wellbeing design policies/guidance within the Neighbourhood Plan. Any development within the Neighbourhood Plan area should	Accepted.  Add in further policy to promote	<b>Amend Plan.</b>

				<p>contribute to the health and wellbeing of local communities through:</p> <ul style="list-style-type: none"> <li>• Encouraging healthy lifestyles through providing opportunities for active travel and fresh food growing;</li> <li>• Enhancing opportunities for community cohesion through creation of environments that encourage residents to get outdoors and participate in social interaction;</li> <li>• Considering routes and public transport provision which offer convenient, safe and attractive access to employment, homes, schools and public facilities;</li> <li>• Catering for the need of all age groups, in particular the elderly, through the provision of seating areas, shading and simple and clear signage.</li> </ul> <p>We would also encourage that the Clifton upon Teme Neighbourhood Plan includes a requirement for the preparation of Health Impact Assessments for future development sites. This process offers a great opportunity to encourage future developments within Clifton upon Teme to be designed to support the health and wellbeing of the existing communities and any future residents. A Health Impact Assessment is a process which ensures that the effects of development on both health and health inequalities are considered and responded to during the planning process. A Health Impact</p>	<p>health and wellbeing as suggested.</p>	<p><b>Insert additional supporting text to Section 4.5 Recreation and change title of Section to “Recreation and Health”</b></p> <p><b>“At Regulation 14 consultation stage Worcestershire County Council commented that they would encourage the inclusion of health and wellbeing design policies/guidance within the Neighbourhood Plan.</b></p> <p><b>It is increasingly recognised that the places and spaces where we live and work can have an impact on health and wellbeing and that an individual’s actions to improve their lifestyle or health status are likely to be influenced by the environmental and socio-economic context within which they take place.</b></p> <p><b>The design of the built environment can have a significant impact on physical and mental health and how people perceive their environments. The location, density and mix of land uses can have wide-reaching implications on how individuals live their lives; it can affect user experience of access to and provision of key community facilities such as public services, employment opportunities, healthy food choices and parks and green spaces. How areas and buildings connect to one another through street layout, footpaths, cycleways and open spaces can impact on mental health and well-being and the amount of physical activity people undertake. As an example, well connected, attractive, safe, and legible streets, footpaths and cycle networks can encourage more people to use them, promote</b></p>
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				<p>Assessment aims to enhance the potential positive aspects of a proposal through assessment while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that might be affected. Information on the HIA process, data sources, and guidance on health and wellbeing considerations in relation to new development sites can be found in the HIA Toolkit for Planning available on the WCC webpages:  <a href="http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment">http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment</a> If you would like to discuss these matters further please contact Marta Dziudzi at the Department of Public Health E: <a href="mailto:mdziudzi1@worcestershire.gov.uk">mdziudzi1@worcestershire.gov.uk</a>, T: 01905 766794. Yours sincerely <b>Natasha Friend</b>  Principal Planner</p>	<p><b>physical activity and consequently reduce the frequency of car usage.”</b></p> <p>Insert additional policy:</p> <p><b>“Policy CR? Supporting Health and Wellbeing in Clifton upon Teme</b></p> <p><b>New development within the Neighbourhood Plan area should contribute to the health and wellbeing of local communities through:</b></p> <ol style="list-style-type: none"> <li><b>1. Encouraging healthy lifestyles through providing opportunities for active travel and fresh food growing;</b></li> <li><b>2. Enhancing opportunities for community cohesion through creation of environments that encourage residents to get outdoors and participate in social interaction;</b></li> <li><b>3. Considering routes and public transport provision which offer convenient, safe and attractive access to employment, homes, schools and public facilities;</b></li> <li><b>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.</b></li> </ol> <p><b>A Health Impact Assessment (insert footnote) will be required for new development proposals.</b></p> <p><b>Footnote:</b> Information on the HIA process, data sources, and guidance on health and wellbeing considerations in relation to new development sites can be found in the HIA Toolkit for Planning</p>
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							available on the WCC webpages: <a href="http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment">http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment</a> ”
17. John Fletcher on behalf of self/ Lion Inn/ Clifton Engineering/ Clifton Early Years Centre		3.0  Vision and Objectives:		Support	I enthusiastically support this section including the 6 objectives	Noted.	No change.
		1.12		Comment	Population growth arising from an additional 118 properties, 37% increase, would to me at first sight be a threat to the village and village life as we know it. The development of Saxon Close and Manor Road simultaneously was a precedent. (from which I benefitted)	Noted.	No change.
		4.3		Comment	If this new development takes place over a longer period, say 10 years, the village and it's resources will have time to adjust. As an observer it would appear that explosive growth will not occur, developers have to be confident they can sell or let the new properties and not flood the market to the detriment of unit prices. I think that commercial limitations and cash flow issues will control the rate of building. Growing population will certainly assist EYC and The Lion in their endeavours. Increased population will benefit Clifton businesses by providing local staffing resources.	Noted.	No change.

		4.6		Comment	<p>Parking: More off road public parking in village is desirable, and also clear but discrete signage to same to aid visitors and “drop-offs” and help reduce congestion with on-street parking especially outside Shop, Lion, School, EYC.</p> <p>Need space for nominal “5 minute” parking outside the Shop for passing traffic and for residents en route in or out of the village, but no yellow lines please. Additional housing will generate greater brief parking demand here.</p>	<p>Noted.</p> <p>See comments from Worcestershire County Council re parking in the village centre.</p>	No further change.
			CH1	Support	<p>New development parking requirement, 1 place per bedroom is noted and I agree I also support traffic speed controls especially near the school and EYC, also at the top of Hope Lane</p> <p>SAFETY OF OUR CHILDREN IS ABOVE ALL ELSE</p>	Noted.	No change.
	All			Comment	<p>Street Cleaning. <b><i>Occasional street sweeping is needed.</i></b> We used to have an occasional pass of a mechanical road sweeper. Street gutters are dirty, take a look outside the school....under the safety rails...accumulated natural debris</p>	<p>Noted.</p> <p>This is not a land use planning matter – refer to Parish Council.</p>	No change.
	All			Comment	<p>Telephone Box: This listed building is in need of work to conserve it and for it to look good. It is an important feature of our heritage. Pity to paint it green for another function. I am in favour of installing a Defibrillator of course but else-where than in the telephone box. See note elsewhere. With free internet telephones, could we not have such a device installed at “our” cost in the telephone box to</p>	<p>Noted.</p> <p>This is not a land use planning matter – refer to Parish Council.</p>	No change.

					provide a useful amenity? Question emergency 'phone use?		
		4.5		Comment	Village information board. Could be more visible, more structured, access for private notices, see Martley	Noted.  This is not a land use planning matter – refer to Parish Council.	No change.
		4.6		Comment	Better Broadband. Make the village a better place from which to run a business. Additional homes planned plus the growth in working from home on line will need a high standard of broadband. School and EYC also need the best service possible.	Noted.  This is addressed in the NDP.	No change.
				Comment	<b>Defibrillator:</b> I would be happy for this to be installed on The Lion wall but we went through the exercise and evidently, the equipment has to be nominally owned by the location housing it and that carries liabilities in the case a misfortune. The Lion's insurer would not cover this.	Noted.  This is not a land use planning matter – refer to Parish Council.	No change.
		4.5 and 4.65		Comment	Bus services: With planned growth in population of village, attention must be given to improving bus services. We need times to suit working hours.  Many new residents will commute to adjacent areas, probably Worcester will be main destination....for work, college, charity work, shopping, social. Often 1 person / car. What is the carbon footprint effect if all this is by private transport? Much bigger than the benefit of a "Energy Generation" on buildings etc in Clifton.	Noted.	No change.



					I suggest Tenbury and Bromyard are great destinations too and will also appeal to retired persons and non-motoring residents, for a day out. The present Tenbury bus gives fleeting moments at its once a week destination.		
		4.5		Comment	<p><b>EYC...nursery:</b> A wonderful facility for Clifton and surrounding areas. A non-profit organisation supported by much voluntary help. <b><i>Needs all possible help and consideration in the development plan.</i></b></p> <p>Some of the benefits it brings:  Opportunity for our young ones to enjoy the company of others and to learn to interface with them; brings in children from other villages and other walks of life to broaden our children's life experience and to learn the routines of school ahead of time. Gives working parents opportunity to leave their child in safe, qualified, enjoyable and early educational environment. Gives parents free time for social and other reasons.  Promotes pupil input to Clifton school 'though this may be a fait accompli with the prospective population growth  Provides employment opportunity in the village for staffing requirements</p>	Noted.  The NDP aims to protect and support improvements to local community facilities.	No change.
		4.4	ET2	Comment	The Lion. (I am the proprietor) This enterprise was at the point of "extinction" between 5 and 6 years ago, in common with so many pubs in the UK. See Teme Triangle Ca 2010. Through my own capex and ongoing financial support it has come back to life and with a small but hard working team is creeping back	Noted.  The NDP aims to protect and support improvements to local businesses	No change.

				<p>towards economic viability, but some distance to go yet. Our books are open for inspection.</p> <p>Business rates are a disproportionate component of our operating costs. (A la private high street shops in cities, which are closing)</p> <p>(Post Script. Received on 25th August, Business Rate Relief granted [25%] for the current year after much correspondence).</p> <p>Our "Round-the-World" dining programme and other menu attractions with supporting marketing are bringing in clientele from a wider area.</p> <p>Incoming new population will assist.</p> <p>WHAT THE LION OFFERS:</p> <p>Encourages tourism, we promote local walks.</p> <p>We provide accommodation in three superb rooms. (Do come and view)</p> <p>We invite clubs, walking groups, retired people's groups, Shelsley visitors, car clubs and many more &amp;c.</p> <p>We support our local football team, Clifton Rovers, and host their various functions</p> <p>We create employment including for young people.</p> <p>We purchase where viable from local suppliers</p> <p>We offer fine and affordable fayre, dining and ales</p> <p>A great restaurant "on the doorstep"</p> <p>A great social centre and meeting place</p> <p>I am open to any suggestions which would support and secure the future of The Lion.</p>	and commercial facilities.	
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		4.2		Comment	Built Heritage. I am totally in favour of objectives under this heading and have myself long practiced the maintenance and enhancement of my home Bury's Place and it's farm buildings and in recent years same for The Lion JF, Lion	Noted.	No change.
18. Resident				Comment	<p>My comments against the Discussion Draft Version 3 (February 2016) highlighted the need to clarify the Settlement Boundary given its importance to the NPD. The revised document still contains ambiguities on the definition of the Settlement Boundary.</p> <p>1) The only diagram which appears to attempt to define the Settlement Boundary is Map 11 which is titled "Clifton upon Teme Development Boundary (SWDP)" and yet the index refers to this as the "Clifton upon Teme Settlement Boundary".</p> <p>2) Draft Version 3, Map 2 defined the proposed Settlement Boundary as including the housing developments opposite Steps Farm and Blueshot Meadow. There is no explanation as to why these have been excluded from the Map 11 within the latest version.</p> <p>3) The change highlighted in point (2) above is inconsistent. Planning permission has been approved for the Hope Lane proposal, which is included within the Settlement</p>	<p>Noted.</p> <p>1) Refer to comments from MHDC submitted at informal consultation stage. Map 11 provides the settlement boundary as currently adopted by MHDC. The terms "settlement boundary" and "development boundary" are both used in planning documents, but "development boundary" is the term used by MHDC. Appendix 9 - Glossary of Terms could be amended to include "development boundary" as well as settlement boundary.</p>	<p>Amend Plan.</p> <p>Amend Glossary of Terms – insert "Development Boundary" and refer to "Settlement Boundary".</p> <p>Amend Map 2 Proposals Map to include Development Boundary.</p>

					<p>Boundary, yet Blueshot Meadow has not been given final approval. Given the state of these development proposals through the Planning Application Process, it is inappropriate to remove any influence the Parish Council will have over the nature of these housing development which have not been given full planning permission.</p> <p>4) Section 4.3.14 states “New housing development in the open countryside, outside the Clifton upon Teme village settlement boundary (Map 13)....” and yet Map 13 defines the open spaces within the Village. Therefore Map 13 does not give any indication of the Settlement Boundary or the defined “Open Countryside”.</p> <p>5) Map 11 area excludes Church House Farm which is identified within the September 2015 Policy Map Changes of the SWDP designated as SWDP 59b.</p> <p>6) Section 4.3.10 states “....The Clifton upon Teme NDP, therefore, seeks to manage future housing growth largely within the confines of the adopted development boundary.” and yet the plan itself covers the area defined in Map 1 according to section 1.3. This again highlights the</p>	<p>2) and 3) The Note provided with Map 11 explains the inclusion of this development boundary. The Parish Council is aware that this is confusing, however it has followed the advice of MHDC planning officers in this approach.</p> <p>4) Map 11 defines the settlement boundary. Map 2 Proposals Map could be amended to show the development boundary to improve clarity.</p> <p>5) Refer to MHDC comments. The NDP has to be in general conformity with the strategic policies in the local plan and officer comments from MHDC confirm that the correct development</p>	
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					<p>need for clarity over the area covered by the plan, and the Settlement Boundary defining the use of policies CH1 and CH2.</p> <p>In order to ensure clarity in the definition of the Settlement Boundary labelling and a clear and concise map needs to be provided.</p> <p>I feel that the Settlement Boundary should revert back to that of Map 2 within Draft Version 3 with the addition of Church House Farm, i.e. all approved and proposed housing developments should be included. In addition the boundary should also be extended along Church Road to the village boundary, i.e. past Steps Farm. Policy CI2 supports the erection of "Entrance gates to the village", presumably the position of these gates will coincide with the village sign posts and yet the apparent current definition of the Settlement area is inside this village boundary which appears illogical.</p> <p>Exclusion of these proposed developments will render section 1.13 null and void.</p>	<p>boundary is provided in the NDP.</p> <p>6) The NDP covers the parish, as per Map 1, but seeks to manage growth within the development boundary.</p> <p>This is geographically incorrect. Opposite ends of the village. Past Church Farm?</p>	
19. Resident	69/74			Comment	<p>I still think that the page headed "Recreation Ground" should be "Playing Field." Also the listing includes the children's play area.</p>	<p>Accepted.</p> <p>Amend photograph notation to "Playing Field".</p>	<p>Amend Plan.</p> <p>Amend photograph notation to "Playing Field".</p>
20. Resident	67/68/69		SWDP 38 Green Space,	Object/Comment	<p>I have lived in Clifton for 33 years-Well Meadow has never been an "open space". Events or access to the field have been</p>	<p>Refer to comments from landowner above.</p>	<p>Amend Plan.</p>

			Well Meadow		hosted by Mr & Mrs Crump on a specific "permission" basis only. It needs to be removed from the plan as it has been entirely misrepresented as a "local green space". The fact that it is and has always been fenced and gated with marked footpaths should clearly indicate that it is private land-no one has a right to access it other than by way of the official WCC footpaths. Please can you advise what substantiation was used to include it in the plan in the first place.		Insert footnote to section on candidate local green spaces clarifying this:  <b>"Note – See definition of Local Green Space in Glossary of Terms, Appendix 9. It is important to note that Local Green Space designation does not assume or require recreational use or public access (other than on existing public rights of way) and sites can be in private ownership or controlled and used by bodies other than the Parish Council or local authorities."</b>
21. Verbal Comment from New Inn	85				We do have a pool team.		