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Our ref: L:\FPI\Neighbourhood  
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19 December 2005

Dear Tony,

**Leeds City Council response to the Pre-Submission Draft Clifford Neighbourhood Plan**

Thank you for consulting the Council on the Pre-Submission Draft Clifford Neighbourhood Plan. The Clifford Parish Neighbourhood Plan Group and the parish council have produced a well laid out and professional plan that seeks to improve the sustainability of the village.

We hope that these formal comments on the pre-submission plan will help the neighbourhood plan group and the parish council in making changes to the document prior to formal submission for examination. You will be aware that there is no obligation to take them on board. For ease of understanding, comments have been grouped under the following headings:

1. Timing/risks – the risk of proceeding with a neighbourhood plan in the absence of an approved Site Allocations Plan
2. Basic Conditions – the neighbourhood plan will be assessed against the Basic Conditions at examination
3. Planning policies – more detailed comments on each policy in the draft plan with observations and suggestions for you to consider.

1. **Timing/risks**

- 1.1 As you will be fully aware, the Publication Draft Site Allocations Plan has recently been subject to public consultation. The City Council is currently in the process of assessing all the representations received and this is likely to result in further modifications to the draft plan. The removal of the Headley

Hall site just prior to the consultation period will necessitate the identification of alternative housing sites in the Outer North East area and therefore increases uncertainty in this area generally. Therefore there is a continued risk that if/when the SAP is adopted after the neighbourhood plan is made, elements of that neighbourhood plan could be superseded.

## 2. **Basic Conditions**

2.1 At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990. The following are considered to be relevant to Clifford's pre-submission draft neighbourhood plan and comments are made on these in relation to the content of the draft Plan:

### **a) Having regard to national policies and advice contained in guidance issued by the Secretary of State**

2.2 The draft Clifford Neighbourhood Plan is considered to generally have regard to the provision of the NPPF. It promotes sustainable development and by and large supports the strategic development needs and priorities set out in the Leeds Core Strategy. The development needs of the area have been assessed and the Plan contains policies and guidance to positively direct and shape future sustainable development to enhance and improve Clifford. Policies address a wide range of issues highlighted in the NPPF including housing mix, design quality, conservation of heritage assets, protection of village facilities and green spaces, new green spaces and sustainable transport. Detailed comments on specific policies and paragraphs are contained in paragraphs 3.1 – 3.43.

2.3 It is felt that the draft plan is silent on climate change, renewable resources, energy and flood risk. These are important considerations in the NPPF and it would be advisable to consider them through the neighbourhood plan if there is anything locally specific to Clifford to say. It should be noted that the Environment Agency did comment on flooding during the SEA screening process.

### **b) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development**

2.4 Overall, sustainable development is a core theme running throughout the document and this is clearly reflected through many of the policies. The allocation of a small housing site within the built up area of the village close to facilities and services gives scope for new properties to be provided in a sustainable location, potentially to meet local need. Much of the plan is

focussed on the protection and enhancement of the existing environmental, social and economic characteristics of the village. It contains specific reference to protecting and improving open space provision, footways, footpaths and cycleways but there are issues of how these will be delivered.

2.5 As outlined previously, it is suggested that the draft plan should consider low carbon energy e.g. wind turbines, solar energy etc and show how these can contribute to sustainability of the village and plan if relevant.

**c) That making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority.**

2.6 The policies contained in the draft Clifford Neighbourhood Plan should be in conformity with the strategic policies of the Local Plan. The Core Strategy was adopted in November 2014 and there are a number of RUDP policies that are 'carried over'.

2.7 Most policies in the Core Strategy that concern a wider area than just the parish might be considered strategic but the key strategic policies are set out in **Appendix 1** with a brief commentary on the conformity of the draft neighbourhood plan.

**d) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.**

2.8 You will receive a formal response from the City Council on the need for any assessments in relation to these European Directives, however following consultation with the Environment Agency, Heritage England, Natural England and the Council's Nature Conservation Officer, the general view is that the policies and proposals in the draft Clifford Neighbourhood Plan would not have a significant effect on the environment, habitats or birds of the area and therefore formal assessments will not be required.

### 3. **Detailed comments on the Draft Planning Policies**

#### **Key Community Priority -1 Preferred Location for Development**

3.1 The Plan makes it clear that only the Site Allocations Plan can allocate sites in the Green Belt which is the responsibility of Leeds City Council. However, it appears that the parish council are recommending that the City Council allocates this area as either safeguarded land or a housing site through the Site Allocations Plan. The plan could recommend this but it would have no

status and would not be an appropriate neighbourhood plan policy. It is recommended that this section be removed from the Plan.

- 3.2 It is appreciated that the Plan does not put forward the key community priority as a policy but, nevertheless, it raises issues of non-conformity with Leeds' Core Strategy. Clifford is not a settlement within Leeds' Settlement Hierarchy. Policy SP1 expects the largest amount of Leeds' development growth to be focussed on the Main Urban Area and Major Settlements, with Smaller Settlements contributing limited growth related to the particular size, function and sustainability of the settlement. The policy offers no explicit role for the settlements that fall outside of the Settlement Hierarchy (such as Clifford). Paragraph 4.1.15 says that such settlements offer "...limited development opportunities..." where development "...will only be permitted if it functionally requires a rural location". The scale of KCP1 clearly exceeds the expectation of this policy.

### **Introduction**

- 3.3 The last paragraph refers only to residents having a real influence over development that takes place in the parish. Neighbourhood Plans should consider the needs of not only those who live in the area but also those who work or carry out business. The Plan should say more about this. For example how have businesses in the area been involved in the process e.g. St John's School, Bramham Primary School, Boston Spa High School, St Martin House Hospice etc?

### **Clifford parish – a brief sketch**

- 3.4 There is reference to the 'schedule of heritage features' in the appendices but this could benefit from more detail on the intention as well as a list of the assets. Clarity is sought on whether the intention is to merely highlight the features listed or to afford statutory protection. If it is the latter, sufficient evidence will need to be provided.

### **The Neighbourhood Planning Process**

- 3.5 First bullet point - the Parish Council did not need to gain 'approval' to be the designated body for the preparation of the neighbourhood plan as parish councils are automatically the qualifying body. The approval was for the neighbourhood area.
- 3.6 How will the last bullet point be achieved?

### **Policy DEV-1 Protected Areas of Search**

- 3.7 This policy duplicates national and local plan policy. It is not appropriate for a neighbourhood plan to do this. The desire (contained in the 'explanation' section) to return the two safeguarded sites to Green Belt and focus development to the west of the village is not in general conformity with local planning policy. The examiner recommended a modification to delete a similar policy in the Linton Neighbourhood Plan on the grounds that it dealt with an issue that must be determined by Leeds City Council rather than a neighbourhood plan. The City Council therefore advises that the policy should be deleted along with any supporting text.

### **Policy DEV-2 Appropriate Housing Mix**

- 3.8 Policy Dev-2 aligns with Policy H4 of the Core Strategy. However, the policy requires a trigger point as it would not be possible to insist on a mix when dealing with an application for a single dwelling. The neighbourhood plan highlights the need for the housing mix to reflect the local needs. This is a good intention but clarification is needed on how these needs have been identified. The policy could explore the opportunity to seek a proportion of new dwellings as 1 & 2 bedrooms.
- 3.9 Under the 'factor in reasoning/justification' section, some clarification of the phrase 'there is still a good range in household economic situations' would be useful. Also, some further explanation of the bullet point covering the 'importance of housing types from Household Survey (Autumn 2012)' would be helpful. It is noted that 55% of respondents thought 3-4 bed housing was important even though the policy promotes the provision of smaller units.
- 3.10 The Council's Adult Social Care service suggests it might be appropriate to add a reference to ensure that any resulting housing developments are able to be adapted for older people e.g. even surfaces, passages wide enough for wheelchairs and appropriately designed toilets, bathrooms and kitchens.

### **Policy DEV-3 Design Standards**

- 3.11 Para 60-65 of the NPPF set out national expectations in relation to the influence of local policy on design. Policies should seek to promote local distinctiveness but not impose certain styles or stifle innovation and originality. The policy highlights the importance of new development meeting the high standards of design that match the Clifford Parish Character Assessment and therefore aligns with Core Strategy Policy P10.

- 3.12 The 'Character Assessment' is not particularly detailed. The policy references design, height, scale, layout and materials but little mention is made of these aspects. For example, Character area 2 has no accurate reference to design, height or scale. Court Barton Lane appears not to be in a character area. Further detail would be helpful and a definition of a "high standard" of design would be useful. Perhaps the key principles and advice could be summarised in terms of design, height, scale, layout and materials for each character.
- 3.13 The photos within this section show roads and parking. This is an opportunity to show examples of good design and some of the distinctive characteristics of Clifford that are important when considering design of new development. This can assist Development Management in determining planning applications.
- 3.14 There are policies within the Core Strategy requiring open space and landscaping within new development. There is a threshold for the provision of open space therefore development needs to be of a sufficient scale to justify provision.
- 3.15 Policy P10 considers how design can create a safe and secure environment that is accessible to all. The plan should offer further guidance and clarity on this.

#### **Policy DEV-4 Parking**

- 3.16 This policy would be difficult to apply as applications could not be refused because of the loss of parking spaces. For example, consider the conversion of a pub to a single dwelling which would reduce the parking requirements from needing 10/20 parking spaces to 2? The policy does follow Leeds Council guidelines. These can be found in Leeds Parking Policy Supplementary Planning Document. It would also be useful to define the 'central area' on a plan so it is clear where this policy applies.
- 3.17 The Council's Design Team considers there could be potential for a village centre 'pedestrian-priority' section of paved highway to slow traffic through the village and help to relieve traffic congestion by restricting parking in the central area. The Boston Spa NP is proposing such a scheme. The Council would be happy to discuss this further.
- 3.18 Adult Social Care highlights the importance of ensuring pavements are clear of any obstructions (including parked cars) particularly for the elderly.

### **Policy DEV-5 St. John's Site**

- 3.19 This site lies within Green Belt and as such it will be Green Belt policy that will be considered in assessing a planning application. In particular, the key consideration will be that any future development of the site will be limited to that which has no greater impact on the openness of the Green Belt than what is already there. The policy is broadly in conformity with national Green Belt policy. However, it is more restrictive and prescriptive than para 89 of the NPPF. The limitation of new development to within the existing footprint removes potential flexibility of reducing the impact of development on the Green Belt by for example increasing footprint or relocating development but reducing heights or massing. It may be more useful to consider volume rather than footprint. Also, what evidence supports the first bullet point?
- 3.20 The City Council is proposing to protect 4 areas of green space at St John's School through the Site Allocations Plan (G1398). There will be a presumption that these will be retained, subject to the provisions of Core Strategy Policy G6. The criteria set out in the policy to protect the greenspace are consistent with City Council policy. Nevertheless introducing more flexibility on the provision of green space could create opportunities for other benefits e.g. improved public access to the areas.
- 3.21 It would be useful to define 'largely' in relation to the retention of the eastern aspect of the building. How would a 'detrimental effect on the character of the area, amenities of neighbouring properties, or the highway network' be specifically assessed?
- 3.22 Some other neighbourhood plans have included marketing period requirements though these should be reasonable and not excessively onerous. Perhaps the policy could simply establish a 'presumption in favour of an educational use.'

### **Policy BE-1 Enhance Village Hall & Grounds Facilities**

- 3.23 The Council is supportive of the overall aims of the plan in this respect. However, a planning application would be required to meet one of the following criteria:
- (i) There is an adequate supply of accessible green space in Clifford
  - (ii) The green space is replaced by an area of at least equal size, accessibility and quality in the same locality
  - (iii) Where supported by evidence the delivery of wider planning benefits, redevelopment proposals demonstrate a clear relationship to improvements of existing green space quality in the same locality.

Stage B of the Policy meets criteria (ii). Clifford can decide its own local priorities based on consultation, if it can be proved consistent with Policy G6.

- 3.24 A further report went to the Council's Asset Management Board on 10<sup>th</sup> December to explore this proposal in more detail. The Council as land owner of the current village green is generally supportive of the scheme on the proviso that planning permission is secured and a capital receipt is achieved. There are a number of major concerns particularly relating to achieving an appropriate layout on such a challenging site. Development Management have advised that the layout currently included in the Plan fails to comply with Core Strategy Policy P10 and Unitary Development Plan Policies BD5 and GP5 and would be refused therefore it should be removed. It is also doubtful whether the layout would meet space standards. It is advised that early discussions with Development Management take place to explore how these issues can be resolved. There is legal provision for the deregistration and exchange of common land however it is likely to be a complex process.

### **Policy BE-2 – Protect & Enhance Heritage Features**

- 3.25 Leeds City Council doesn't currently have a local list and there are no current plans to adopt one. The policy doesn't address current legislation in place to protect those buildings that are listed and within the conservation area. However, it is appreciated that it should not just replicate higher order policy. Looking at the table on page 37 it is not clear what is classed as a heritage asset and how these criteria have been applied. A more comprehensive list including those elements that are already protected would be a valuable addition to the document. It also has little regard for how they will be protected in the wider document. Does the policy apply to the 'heritage features' on the local list (contained in the appendix) and those that are Grade II listed buildings? Are there ancient monuments or other heritage features this policy should apply to?
- 3.26 The policy appears to support any development that will protect and or enhance heritage features regardless of other policy or material planning considerations which is not acceptable. Further clarification is required and the use of caveats relating to other considerations is recommended. How would a proposal to put houses on a pub car park and use the profits from the development to restore a heritage building be considered as it would be in conflict with policy Dev-4 but comply with BE-2?
- 3.27 The supporting text/justification to Policy BE-2 cites a presumption against infill and back land development, which implies that permission will not be granted for such developments. This should be set out within the policy itself.



Although there is a Conservation Area within Clifford, it is not referenced in BE-2. Whether a site is in or outside of a Conservation Area is an influential factor to be taken into account in development decisions and therefore should be acknowledged in this policy. It would be useful to show the conservation area boundary on the plan on page 17.

**Policy BE-3 – Protect & Enhance Built Community Facilities**

- 3.28 The identification of important community assets and the future formal registration of Assets of Community Value are supported. However, the policy is very broad, supporting any development which results in improvements to the built community facilities listed without reference to other policies or planning considerations. Such a policy could not be supported by the Council. Further clarification is required and use of caveats relating to other considerations is recommended. Furthermore, the Council cannot force facilities to keep operating if the owners don't want to keep running them.
- 3.29 Adult Social Care strongly support the continued maintenance and further development of community facilities as this will be increasingly important with an ageing population. It is recommended that thought is be given to the types of services/facilities that might be needed by an older population and having benches in key areas to make outdoor spaces age friendly.

**Policy GS-1 – Protect & Enhance Green Spaces**

- 3.30 The protection of green space is supported however what are the 'special circumstances' where development could be allowed? Is this an attempt to reflect GB policy and the need for 'very special circumstances' or is it just a loose phrase? A 'loose phrase' would benefit from being tightened up so it is clear under what circumstances development would be allowed.
- 3.31 The City Council should protect sites of 0.2ha or more that are in an open space, recreational use through the SAP. Does Clifford Parish Council want to propose any sites for such protection?
- 3.32 The table below sets out comments on each of the identified local green spaces.

SITE	COMMENT ON PROPOSED DESIGNATION
A - War Memorial	Valued publically accessible space used for village events. Too small for designation in the SAP.

B – Millennium Gardens	Key recreation area close to the village hall. Identified as green space in the SAP (G574).
C – Northways playing fields	Formal outdoor sport provision. Majority of the area identified as green space in the SAP (G572), though SAP excludes the car park. Check the area of the site.
D – Woodland walk	Publicly accessible woodland, identified in the SAP as green space (G572) (part of Northways playing fields)
E – St Edwards Wood	The majority of the site is identified as green space in the SAP (G1455)(outdoor sport) except the south east corner which lies within identified site HG1-45 (i.e. a site with planning permission or a UDP housing site.) This is not consistent with the emerging SAP or compatible with NPPG.
F – Village green	The plan (Policy BE-1) proposes that this site is developed to help fund the purchase of a larger site adjacent to Millennium Gardens therefore it would be contradictory to designate this as Local Green Space.
G – Cricket ground	Well used cricket ground. This is not currently identified as green space in the SAP which needs investigating further by LCC.
H - Allotments	Identified as green space in the SAP.
I – Mill pond area	Not identified as green space in the SAP. Is the area currently in an open recreational use? Should it be designated as green space in the SAP?
J – St Edward’s surrounds	Most of the area identified as green space in SAP (G1461) except a strip of land at eastern edge to provide a vehicular access off High Street to the Safeguarded Site (HG3-11) to the north. This is not consistent with the emerging SAP or compatible with NPPG.
K – St Luke’s surrounds	Churchyard to St Luke’s. Identified as green space in the SAP (G1471)
L – Former Springfield grounds	Proposed housing site in the Issues and Options SAP. Sieved out as Clifford not within the settlement hierarchy. Is it publically accessible and in an open recreational use? Should it be designated as green space in the SAP?

- 3.33 The NPPF (para 77) and the NPPG give clear advice relating to the designation of local green space. It should be in reasonably close proximity to the community it serves, be demonstrably special to the local community and hold particular local significance and not be an extensive tract of land. There is no definition of an 'extensive tract of land' but Site L could possibly be considered as such. The NPPG states that qualifying bodies should contact the owners of any proposed local green space at an early stage. Evidence of this should be provided.

### **Policy GS-2 – Protect Views & Notable Trees**

- 3.34 Overall the policy complies with Core Strategy policies P12, G9 and G2 in acknowledging the positive effects that trees provide for Leeds' landscape. It also complies with good design principles laid out in P10 of the Core Strategy which ensures development protects locally important skylines and views. The policy could not prevent development which is otherwise acceptable but it covers matters to be taken into account. Nevertheless, the policy should not impose what is essentially a blanket TPO on numerous trees as this would be overly burdensome and likely to be unreasonable. Where is the evidence to show all the trees within the area are worth protecting, i.e. do they have amenity value, do they have a reasonable life span and are they healthy? An analysis of existing tree protection could be useful as it could highlight areas where protection is weak and could lead to a strategy for additional formal TPO cover. Who would review these 'professional tree surveys'? Who would advise on appropriate species replacements?
- 3.35 Considering the visual impact of development is a good idea and is something Development Management can use. DM strongly suggests rethinking the first part of the policy to suggest that all significant developments should have regard to landscape character.
- 3.36 The 'explanation' paragraph refers to accompanying maps, photographs and commentary in a following schedule. There is no commentary. It is not always clear what features the pictures of the views are particularly concerned with. It is suggested that views and trees are separated into different policies.
- 3.37 The Design Team suggests there is an opportunity to look at possible new tree planting, including planting to replace older specimens. This would require comprehensive analysis of existing trees.

### **Policy TR-1 –Cycleways/Footpaths/Bridleways**

- 3.38 Policy TR-1 aims to improve the sustainable transport network around the Clifford area. This complies with policy TR1 of the Leeds Core Strategy and the Leeds Travel Plan SPD. However, it is too 'loose' as it is supportive of any development which improves the existing cycle ways, bridleways and footpath network regardless of other planning considerations. The policy needs to be tightened up and the use of caveats relating to other considerations is recommended.
- 3.39 It should be noted that the footway and cycleway improvements highlighted are off-highway and therefore not within the gift of Highways to implement however potentially Public Rights Of Way or Sustrans would be involved.
- 3.40 Adult Social Care has suggested it would also be useful to reference that pathways should be smooth, level, non-slip and wide enough to accommodate wheelchairs with low curbs that taper off to the road.

### **Policy TR-2 – Public Transport**

- 3.41 Policy TR-2 generally complies with Core Strategy Policy T1 though as with previous policies it is too loose as it supports any development which supports enhancements to public transport. The policy needs to be tightened up and the use of caveats relating to other considerations is recommended. Further clarification on the specific needs of parishioners and how this policy could be applied would be useful. Any public transport improvements will be delivered by others (WYCA / bus operators) subject to funding and demand.

### **Community projects**

- 3.42 Community projects are an important and useful part of a neighbourhood plan and most are supported. CCP-01 should be pursued through the SAP.

I hope these comments are useful and help the neighbourhood planning group to review the pre-submission draft Clifford Neighbourhood Plan before it progresses to examination. I understand you have received comments from the Leeds Local Access Forum separately. We are happy to meet to discuss these comments in more detail if you feel the need.

Yours sincerely,



Stephen Speak  
Deputy Chief Planning Officer

**APPENDIX 1 - GENERAL CONFORMITY WITH STRATEGIC POLICIES OF THE DEVELOPMENT PLAN**

Core Strategy Policy	Comments on Clifford NP
SP1 (location of development), SP2 (hierarchy of centres) and SP 7 (distribution of housing)	<ul style="list-style-type: none"> <li>• Clifford falls outside the settlement hierarchy it is not expected to accommodate significant growth.</li> <li>• Policy SP7 seeks 700 dwellings in ‘other rural’ locations over the plan period and Clifford would be considered as one such location therefore it may need to take a limited role in meeting the needs across the district.</li> <li>• The ‘publication draft’ SAP does not propose any housing allocations in Clifford nevertheless this may need to be revisited in the light of the decision by Leeds University to withdraw the Hedley Hall site.</li> <li>• The draft plan does identify a ‘preferred location’ for development to the west of the village under KCP-1 and allocates a small site for housing development on Willow Lane (Policy BE-1). The Council’s comments on these policies are set out in paras 3.1-3.3 and 3.24-3.25.</li> </ul>
H2 (New Housing Development on non-allocated sites), H3 (Housing Density), H4 (Housing Mix), H5 (Affordable Housing), H7 (Gypsies and Traveller accommodation), H8 (Housing for Independent Living)	<ul style="list-style-type: none"> <li>• Policy H2 sets out clearly when the development of non-allocated sites will be acceptable in principle.</li> <li>• If housing development was to be proposed in the context of KCP-1, it would need to be considered against this policy, especially (iii) and compliance with Green Belt policy.</li> <li>• Policy BE-1 would result in the loss of greenfield land with recognised recreational value in an area where all green space typologies are not in surplus but an alternative, larger area that is not currently green space is being proposed. See more detailed comments in paras 3.24-3.25.</li> <li>• The plan suggests there is a need for properties for older people and affordable housing in line with paras 47 and 54 of the NPPF (clearly plan for housing need of an area). It would be useful to quantify the need and say something on how this could be delivered.</li> </ul>
SP8 (Economic development priorities)	<ul style="list-style-type: none"> <li>• The draft Clifford Neighbourhood Plan does not specifically address economic development in the parish. Is this something you would like to address in the Plan or is there nothing ‘Clifford-specific’ you would like to add?</li> </ul>
EC2 (Office development), EC3 (Safeguarding existing employment)	<ul style="list-style-type: none"> <li>• Policy EC2 allows office development up to 1,500sqm in smaller settlements like Clifford. You may consider it sensible for the neighbourhood plan to comment on how such proposals would be viewed.</li> <li>• Policy EC3 notes there may be a case to retain business premises in areas of shortfall</li> </ul>

	(including Outer North East Leeds). Does Clifford have any small businesses and business premises? If so, the neighbourhood plan should set out its position regarding future loss or retention of such premises.
P4 (Shopping Parades and Stand-alone food stores)	<ul style="list-style-type: none"> <li>• Policy P4 is generally permissive of small retail outlets e.g. a supermarket up to 372 sqm so is there anything you would like to say in the plan in relation to such proposals in the Clifford context? There is no requirement to explicitly address this if there is nothing 'Clifford-specific' you would like to add.</li> </ul>
P9 (Community Facilities and other Services), P10 (Design), P11 (Conservation), P12 (Landscape)	<ul style="list-style-type: none"> <li>• The Plan promotes the protection and enhancement of community facilities and heritage features in line with Policies P9 and P11.</li> <li>• Although the Plan does not have a policy explicitly on landscape conservation and enhancement, it does make provision to protect views and notable trees (CNP Policy GS-2).</li> <li>• Policy DEV-3 supports new development that respects and reflects the local distinctive character of Clifford and will deliver high quality design as required by Policy P10.</li> </ul>
SP13 Strategic Green Infrastructure, G1 (Enhancing and extending Green Infrastructure), G2 (Tree Cover), G3 (Open space standards), G4 (New Greenspace) G6 (Protection of Greenspace), G7 (Cemeteries), G8 (Protection of habitats), G9 (Biodiversity improvements)	<ul style="list-style-type: none"> <li>• The draft neighbourhood plan promotes the protection and enhancement of green infrastructure, including trees, and makes provision for the improvement of green space through Policies BE-1 and GS-1.</li> <li>• May be more could be said on the protection of habitats and biodiversity improvements, including how local green infrastructure could be better connected and enhanced.</li> <li>• The designation of greenspace is broadly in accordance with these policies.</li> </ul>
EN1 (Climate Change), EN2 (Sustainable design and construction), EN3 (Low carbon energy), EN5 (Flood Risk)	<ul style="list-style-type: none"> <li>• The draft neighbourhood plan should consider the issues dealt with in these policies if there are some things specifically relevant to Clifford you would like to include.</li> <li>• Parts of Clifford do flood at times therefore the plan should address this as well as suggest mitigation measures to reduce the risk of flooding e.g. the use of porous surfaces.</li> </ul>