**Wilmcote and Pathlow Neighbourhood Development Plan**

**Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General)**

**Regulations, 2012**

**Appendix 1 - Comments from Stratford-on-Avon District Council**

**Policy related comments:**

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| **Section** | **Reference/NDP page** | **Comment** |
| **General** | **Entire document** | Policies should be distinguished more clearly from other text, e.g. within a box or shaded. |
| **Section 7 - Policies** | **Policy WP1 (p.22)** | Second paragraph - given the status of the SSSI, should consideration be given to any exception being appropriate in terms of potentially developing this site? |
| **Section 7 - Policies** | **Policy WP1 (p.22)** | The final sentence may need to be applied more flexibly as a suitable form of compensation may not always be available in the parish itself – suggest it reads ‘within or in close proximity to Wilmcote Parish’. |
| **Section 7 - Policies** | **Policy WP1: Background/Justification (p.23)** | Suggest adding some text to explain to the reader the difference between identified Local Wildlife Sites and potential Local Wildlife Sites, particularly in terms of designation or status. |
| **Section 7 - Policies** | **Policy WP1: Figure 6 (p.24)** | Stratford-upon-Avon Canal is not shown as a Potential LWS although it is listed on previous page. |
| **Section 7 - Policies** | **Policy WP2** | Paragraph 2 – How will potential applicants know whether the development site could potentially impact on important geology? Are you expecting relevant surveys to be submitted with planning applications? Given the relatively small-scale nature of development that will be achieved in the village in accordance with para 89 of the NPPF, it is considered too onerous to insist on the inclusion of such reports for individual applications of a minor nature. |
| **Section 7 - Policies** | **Policy WP3 (p.26)** | Criterion (b) – replace the word ‘permitted’ with ‘supported’ for consistency with the other policies within the Plan. Additionally, it is unclear what is meant by the phrase “when development is permitted, this will be conditioned in such a way so to ensure the development takes place after the loss or harm has occurred”. This requires clarification. |
| **Section 7 - Policies** | **Policy WP5: Background/Justification (p.30)** | The subject covered by this policy is not specifically related to Green Belt designation and its purposes as identified in para. 80 in the NPPF. Green Belt is not a landscape designation per se. Basis of policy should be landscape character/quality/sensitivity and this should be set out in the supporting text. |
| **Section 7 - Policies** | **Policy WP6: Figure 8 (p.32)** | Reference numbers on the map don’t always correlate with the list of views set out in the policy text, e.g. 13 (view from the railway station footbridge). |
| **Section 7 - Policies** | **Policy WP7 (p.33)** | It is suggested replacing the paragraph beginning “Development proposals for non-community uses…” with the following: “The loss of existing community facilities will be resisted unless it can be demonstrated that the current use is no longer viable or that the facility is no longer in active use and has no prospect of being brought back into active community use” for clarification purposes. |
| **Section 7 - Policies** | **Policy WP9 (P.39)** | A settlement boundary for Wilmcote has not been defined to establish where this policy would be applicable. The District Council’s Site Allocations Plan can do this but it is considered more appropriate for the NDP to do so, in order to tie in with the policies set out in the Plan. |
| **Section 7 - Policies** | **Policy WP9 (P.39)** | Criterion (f): there is no reference to harm to the visual amenity of the Green Belt in national policy. Suggest ‘of the Green Belt’ is deleted or (f) is reworded to read ‘would not harm the openness of the Green Belt’. |
| **Section 7 - Policies** | **Policy WP11 (p.41)** | It is considered that criterion b) is at the same time too vague and too lengthy. The criterion should simply read “design that takes into account site characteristics and surroundings”. The 12 sub-points could then be listed somewhere in the explanatory text. It should also be noted that these criteria are all material considerations in the determining of planning applications. |
| **Section 7 - Policies** | **Policy WP11 (p.42)** | Criterion (m): there is no reference to harm to the visual amenity of the Green Belt in national policy. Suggest ‘of the Green Belt’ is deleted or (m) is reworded to read ‘would not harm the openness of the Green Belt’. |
| **Section 7 - Policies** | **Policy WP12 (p.43)** | Criterion (d): there is no reference to harm to the visual amenity of the Green Belt in national policy. Suggest ‘of the Green Belt’ is deleted or (d) is reworded to read ‘…do not have an adverse impact on the openness of the Green Belt’. |
| **Section 7 - Policies** | **Policy WP15 (p.46)** | New footpaths etc. could only be requested via appropriate legal agreements, given that the land in question would invariably lay outside the application site (i.e. in the public highway). |