

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 (February 2017)

Policy related comments:

Section	Reference/NDP page	Comment
General	Introduction	It is a surprise there is no mention of the Pathlow gypsy caravan site. Its existence should be acknowledged even if nothing else is said about it.
Section 5 – Key Issues	Figure 5 (p.17)	It is unclear what the numbers in brackets after settlement names represent – they need to be explained or deleted to avoid uncertainty.
Section 5 – Key Issues	Para 5.10 (p.18-19)	First line at the top of p.19 – amend to read: “The Core Strategy was adopted by the District Council on 11 July 2016. It does not change Green Belt boundaries within the Parish which means that the Wilmcote NDP...”
Section 5 – Key Issues	Para 5.12 (p.19)	Delete paragraph because the District Local Plan has been superseded by the Core Strategy.
Section 5 – Key Issues	Para 5.13 (p.19)	Amend first sentence to read: “The Stratford-on-Avon Core Strategy (Policy CS15) identifies Wilmcote as a Local Service Village. It is ‘washed over’ by the Green Belt which means that only limited infilling and redevelopment is acceptable within its boundaries”. Additionally, in the second sentence, delete ‘emerging’.
Section 7 - Policies	All Policies (General)	It is good practice to highlight policies by placing them in a box or picked out with some form of shading. As things stand, the use of blue type would be lost in a black and white copy of the document.
Section 7 - Policies	Policy WP2 (p.22)	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.23)	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.25)	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 WP7: Policy and Figure 7 (p.28-29)	The railway station could be usefully included.
Section 7 - Policies	Policy WP8 (p.30)	Replace 'permitted' with 'supported' in the second line.
Section 7 - Policies	Policy WP9 (p.34)	First paragraph, second line – consider amending to read 'including residential gardens where appropriate'.
Section 7 - Policies	Policy WP9 (P.34)	A boundary to define the extent (confines) of Wilmcote has not been identified in the NDP. As such, the District Council will do this through its Site Allocations Plan as a means of applying Policy WP9 and Policy CS.15.D in the Core Strategy.
Section 7 - Policies	Policy WP9 (P.34)	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.36-37)	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.37)	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 WP13: Background/Justification (p.39)	Last line of first paragraph – delete 'A' as this is not correct. Only A3400 is this class of road within the NDP area.
Section 7 - Policies	Policy WP13: Supporting Actions (p.40)	These seem repetitive and could be merged into one.
Section 7 - Policies	Policy WP14 (p.41)	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).
Section 9 – How to comment	Entire section (p.44)	This section should be removed from the Plan.