



## BEAUDESERT & HENLEY IN ARDEN JOINT PARISH COUNCIL

### NEIGHBOURHOOD PLAN - REG. 14 - SUMMARY OF COMMENTS

No.		Consultee	Policy	Summary of Comments	Response	Proposed Amendments
1		Historic England	General	<p>Thank you for the invitation to comment again on the Beaudesert and Henley-in-Arden Neighbourhood Plan following the incorporation of various minor amendments. I can confirm that we do not wish to comment further, and our previous Regulation 14 comments still stand.</p> <p>I trust the above comments will be of help in taking forward the Neighbourhood Plan.</p> <p>Peter Boland Historic Places Officer</p>	Noted.	None
2		National Grid	Various	<p>Dear Sir / Madam Beaudesert &amp; Henley-in-Arden Parish Neighbourhood Development Plan Regulation 14 Consultation July – August 2020 Representations on behalf of National Grid National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network</p>	Noted	None

				<p>operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. National Grid assets within the Plan area Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary. If you require any further information in respect of this letter, then please contact us. Matt Verlander Director</p>		
3		Highways England	General	<p>Dear Mr Evans , Beaudesert &amp; Henley-in-Arden Neighbourhood Development Plan 2020: Regulation 14 Public Re-Consultation Notice Highways England welcomes the opportunity to comment on the Henley Neighbourhood Development Plan which covers the period from 2011 to 2031. We note that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national</p>	Noted	None

				<p>economic growth. In relation to the Henley Neighbourhood Plan, our principal interest is in safeguarding the operation of the M40 and M42 to the north of the Plan area. We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Boroughwide planning policies. Accordingly, the Neighbourhood Plan for Henley Parish is required to conform to the Stratford-on-Avon District Core Strategy (2011-2031), which is acknowledged within the document.</p> <p>We note that no specific housing or employment sites have been allocated in the Core Strategy for the Parish, although the Neighbourhood Plan will support small scale housing and employments within the main built-up areas of the parish.</p> <p>Considering the limited level of growth proposed across the Neighbourhood Plan area, we do not expect that there will be any impacts on the operation of the SRN. We therefore have no further comments to provide and trust the above is useful in the progression of the Henley Neighbourhood Plan.</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p>
4		Environment Agency	Various	<p>Ray Evans Parish Clerk &amp; Proper Officer Beaudesert &amp; Henley in Arden JPC Our ref: UT/2007/101490/AP16/PO1-L01 Your ref: Date: 24 August 2020 Dear Mr. Evans Beaudesert &amp; Henley-in-Arden Neighbourhood Development Plan 2020 (Regulation 14) Thank you for referring the above Neighbourhood Development Plan (NDP) pre-submission which was received on 09 July 2020. We wish to make the following comments: The NDP policies should be consistent with the policies in the NPPF and</p>	<p>Noted</p>	<p>None</p>

			<p>seek to reinforce and enhance the policies in Stratford on Avon District Council's adopted Core Strategy 2011 to 2031. In particular, we consider the following policies should be considered: • Policy CS.2 (Climate Change and Sustainable Construction) • Policy CS.4 (Water Environment and Flood Risk) • Policy CS.7 (Green Infrastructure)</p> <p>We have the following comments on the NDP and the proposed Policies; The River Alne is classified as a Main River and runs through the NDP area as well as through the centre of Henley-In-Arden. There is flood risk associated with this watercourse, as shown on the Flood Map for Planning (Rivers and Sea) and many properties located along the river corridor are highlighted as being at risk of flooding.</p> <p>The NDP currently contains a policy for 'Water Management (Policy B3)' however we recommend that this is developed further to take into consideration the existing flood risk within the town and the opportunities to reduce flood risk through new development and/or safeguarding land for future flood risk management purposes.</p> <p>Section 10 – Vision Statement This should ideally make reference to the existing flood risk within Henley-In-Arden and the potential opportunities to reduce this flood risk though Natural Flood Risk Management interventions or other engineered solutions, either as part of new or existing development or via a standalone Flood Risk Management scheme.</p> <p>Policy H1 – Housing Growth The inclusion and consideration of flood risk should be incorporated within</p>	<p>Noted</p> <p>We believe that Policy B3 in conjunction with existing national policy on flood risk is sufficient.</p> <p>Reference to Natural Flood Risk Management interventions or other engineered solutions is added</p>	<p>None</p> <p>None</p> <p>Change to be made as indicated.</p> <p>None</p>
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			<p>this policy. Cont/d.. 2 All new development should be located within Flood Zone 1 and where ever possible contribute to reducing flood risk as well as ensuring flood risk is not increased.</p> <p>Policy H2 – Infrastructure Criteria We recommend that the first bullet point is amended to ensure that all new development should provide above ground sustainable drainage features and should limit the rate of surface water discharge to pre-development Greenfield runoff rates. P4.</p> <p>Natural Environment Consideration of a Policy relating to ‘Blue and Green Infrastructure’ should be given within the Natural Environment section. We recommend emphasis on blue-green corridors as they provide multiple benefits to areas including services such as flood management provision, green space, cooling local temperatures, ecological function and some amenity. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure. Consequently they then need to be afforded a high level of protection from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This could be integrated with the 8m easement requirement as discussed in Policy B3 comments below. If green spaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential in relation to the impacts of climate change. This can also be incorporated into the surface water management of future development sites.</p>	<p>to the Vision at paragraph 10.14.</p> <p>Development in Flood Zones is covered by national planning policies and does not need to be repeated here.</p> <p>Agreed. We will create a new design policy to replace H2, B1 and B4</p> <p>Noted. This will be considered on review of the NDP.</p>	<p>Change to be made as indicated.</p> <p>None</p>
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			<p>Policy B3 – Water Management Consideration should be given as to whether this policy should fall under ‘P4. Natural Environment’ rather than ‘P5. Built Environment’. The River Alne corridor is a natural feature running through the NDP area and needs to be fully considered within the policies of the NDP.</p>		None
			<p>This policy should build upon the requirements of Policy CS.4. This policy should be strengthened to consider the flood risk from the River Alne as well as surface water flooding. The explanation table on page 26 highlights that the town is vulnerable to flooding and alleviating this is a high priority for residents. As a result, policy wording should be incorporated to ensure all new development is located within Flood Zone 1, does not increase flood risk and wherever possible reduces flood risk. The policy should also include detail and reference to what works could be undertaken to reduce the existing flood risk to Henley-In-Arden. The Environment Agency are promoting a scheme on the next capital programme (from 2021 – 2027) to reduce flood risk to Henley-In-Arden. Currently, within that scheme, there are opportunities to incorporate Flood Storage Areas to hold back water as well as Natural Flood Management interventions which can slow, hold back and de-synchronise the flow of water within the upper River Alne catchment. Such measures could include the creation of swales, offline holding ponds and leaky dams to divert water runoff, combined with strategic tree planting and other measures to enhance soil permeability. Initial investigations have taken place to look into potential options, however at present it is unlikely the scheme will be able to attract Government funding (Flood Defence Grant in Aid</p>	<p>We consider the location of the policy to be appropriate. If growth requirements increase in the future, we will consider a review of the NDP and address this issue at that point.</p> <p>We believe that the policy is appropriately worded. There is very limited growth earmarked for the neighbourhood area through the plan period.</p> <p>These issues will be considered in a review of the NDP which is likely to</p>	<p>None</p> <p>None</p> <p>None</p>

			<p>(FDGiA) to fully fund the scheme. Therefore further contributions will be End 3 required to implement a scheme in the River Alne catchment to reduce flooding to Henley-In-Arden. With this in mind, we recommend that Policy wording is included to attract funding from developers. For example “developers are required to contribute towards the cost of any future Flood Risk Management scheme proposed in the River Alne catchment”. In addition, the current policy states ‘New developments for residential or commercial buildings will be expected to provide and incorporate sustainable drainage systems unless it is demonstrated that this would be inappropriate.’ We recommend strengthening the policy relating to SuDS due to the multiple benefits they provide alongside flood risk mitigation. Climate change will result in a an increase in peak rainfall in addition to peak river levels and therefore all new development, including infill development and small scale development, should incorporate above ground SuDS, and limit the rate of surface water discharge to pre-development Greenfield runoff rates, to reduce flood risk and ensure that surface water runoff does not increase the risk of flooding elsewhere.</p> <p>We recommend that the NDP defines a “no build zone” either side of the River Alne extending at least 8m from the top of bank and incorporating the 1 in 100 year plus climate change extent. This will create open space and offer the opportunity to create multifunctional flood storage areas and ensure access for maintenance of the watercourses is maintained in the future.</p> <p>In addition to the comments above, we note the Water Framework Directive (WFD) and objectives from the Severn River Basin Management Plan have not been</p>	<p>take place once future growth requirements are known and the review of Green Belt undertaken.</p>	<p>Change to be made as indicated</p> <p>None</p>
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				<p>included as part of the evidence base within Section P.4 (Natural Environment) and Section P.5 (Built Environment). The River Alne within the NDP boundary is classified as having 'Moderate Ecological Status or Potential' and under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The NDP should support the WFD to secure water quality improvements where possible and align with Stratford-on-Avon District Council's Core Strategy 2011 to 2031, in particular Policy CS.4 Water Environment and Flood Risk. Further Recommendations We recommend that Warwickshire County Council as the Lead Local Flood Authority are consulted on this NDP. The LLFA are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water. If you have any queries contact me on the details below. Yours sincerely</p>	<p>Agreed</p> <p>Noted. Warwickshire CC were consulted on this NDP.</p> <p>We do not believe that the stated references are required as they are highlighted in the Core Strategy, with which the NDP is in general conformity with.</p>	None
5	Canal & River Trust	Various	<p><b>From:</b> Ian Dickinson  <b>Sent:</b> 20 August 2020 10:14  <b>To:</b> Parish Clerk</p>	Noted	None	



				<p><b>Subject:</b> Beaudesert and Henley in Arden Neighbourhood Development Plan Regulation 14 consultation</p> <p>Dear Mr. Evans, Thank you for consulting the Canal &amp; River Trust on the amendments to the proposed Neighbourhood Plan. The Plan area does not include any of the Trust's waterways and we therefore have no comments to make.</p> <p>Regards, Ian Dickinson MRTPI Area Planner</p>		
6		WCC Flood Risk	Various	<p>Tabulated Warwickshire County Council Flood Risk Management Comments on the Beaudesert &amp; Henley-In-Arden Neighbourhood Development Plan 2011 to 2031 WCC FRM has the following content related comments: Page Paragraph Comment No. Commencing: 12 10.6/10.7 10.11</p> <p>Vision Statement We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces for flood risk benefits as well as biodiversity and ecology. You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites. All developments will be expected to include sustainable drainage systems. If a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must</p>	Noted	None
					We Have amended the vision statement to include reference to Natural Flood Risk Management interventions.	None

			<p>be submitted to the Lead Local Flood Authority for review.</p> <p>14 11.1 Green Belt and Rural Setting We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.</p> <p>16 Policy H2 We support reference to flood risk and sustainable drainage in policy H2 in steering development away from flood risk areas and minimising the impact of future development on flood risk. We recommend references made to the Environment Agency Flood Mapping for the River Alne and Surface Water Flood Mapping. As LLFA we have strategies and guidance documents on our website for further information. Henley-in-Arden is in an Environment Agency designated Flood Risk Area. These areas determine where Flood Hazard and Risk maps and Flood Risk Management Plans must subsequently be produced to meet obligations under the EU Floods Directive. You may wish to refer to this in the NDP and recommend consulting the Environment Agency to discuss further. Page Paragraph Comment</p> <p>25 Policy B1 – Development Criteria Policy B3 – Water Management You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites. If a site is classed as a major planning application, in line with the National Planning Policy Framework, to demonstrate an acceptable level of flood risk, a site specific Surface Water Drainage Strategy must be submitted to the Lead</p>	<p>Agreed. We will add in this reference.</p> <p>Agreed. We will add in reference to Environment Agency Flood Mapping for the River Alne and Surface Water Flood Mapping in a new design policy.</p> <p>It is inappropriate to require consultation with a third party in a policy.</p> <p>We do not anticipate large scale developments and consider the policy to be sufficient.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>None</p> <p>None</p> <p>None</p>
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			<p>Local Flood Authority for review. All developments will be expected to include sustainable drainage systems. You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length. You have detailed that new developments for residential or commercial buildings will be expected to provide and incorporate sustainable drainage systems unless it is demonstrated that this would be inappropriate. This could be strengthened to say all developments will be expected to include sustainable drainage systems.</p> <p>In the explanation you have mentioned the creation of containment ponds. Do you mean attenuation ponds?</p> <p>28 Project 1 – Car Parking The document suggests that new car parks might be developed at some stage. Depending on the size and type of drainage, there is an opportunity to introduce SuDS and adequate treatment for flows (such as permeable paving), to ensure that discharge/run off flows leaving the car park site do not degrade the quality of accepting water bodies, providing greater amenity. This may also reduce the rate of runoff therefore have a positive benefit on flood risk.</p>	<p>This will be reconsidered in a subsequent review of the NDP if growth targets change.</p> <p>We will create a new design policy incorporating elements of H2, B1 and B4.</p> <p>We will keep as is because there may be circumstances where ALL development cannot incorporate sustainable drainage systems.</p> <p>This is not a planning policy but a community project. The detailed planning requirements will be considered should</p>	<p>None</p> <p>None</p>
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					the project be feasible.	
7		Sport England	General	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b>, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be</p>	These general comments are noted	None

			<p>found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and</p>		
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			<p>implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p>		
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				<p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p> <p>Yours sincerely, Planning Administration Team</p>		
8		Inland Water Authority	General	<p>Dear Sir,</p> <p>Thank you for sending me the NDP document which I received from the Inland Waterways Association head office recently. As the IWA Planning Officer for the</p>	Noted	None

				<p>Warwickshire branch, it is my job to deal with all planning matters in our area (HS2 excepted). Whilst the Beaudesert &amp; Henley Parish contains no navigable waters which are our main concern, we are happy to support your NDP in order to maintain the character and independence of the area. We hope you achieve a speedy passage for your excellent presentation.</p> <p>Best wishes, Dr G J Nicholson Planning Officer, IWA Works branch.</p>		
9		HIA	Various	<p>THE BEAUDESERT AND HENLEY-IN-ARDEN NEIGHBOURHOOD PLAN 2011-2031 REGULATION 14 DRAFT PLAN CONSULTATION ON BEHALF OF HIA DEVELOPMENTS LLP AUGUST 2020 REF: PF/10053</p> <p>Representations to Pre-submission Draft 2 Frampton's Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 1.0 INTRODUCTION 1.1 These submissions are made on behalf of HIA Developments LLP, the owners of land to the west of Henley-in-Arden (Appendix 1). 1.2 These submissions consider that the Neighbourhood Plan is seeking to add an unnecessary layer of restrictive development plan policy which is inappropriate and will restrict future sustainable growth around Henley-in-Arden.</p> <p>Representations to Pre-submission Draft 3 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 2.0 SUBMISSIONS 2.1 The Draft Neighbourhood Plan sets out its vision statement at section 10. At paragraph 10.3 it states: "Our town aims to</p>	<p>Noted. We disagree that the NDP adds an unnecessary layer of restrictive development plan policy. The NDP includes policies that support appropriate development but carefully manages what that development is, and where it goes, in line with broader strategic policies, which is the purpose of neighbourhood planning.</p>	<p>None</p> <p>None</p>



			<p>be a strong, inclusive and accessible community that supports the needs of new and existing businesses and residents of all ages.” 2.2 Paragraph 10.11 sets out that one of the objectives is ‘Sustainable Residential Development’, and states: “The NDP should support, where feasible and not in contravention with other objectives, new small scale opportunities for residential development within the existing town boundary to support local and district housing needs that are well related to the villages and are of a high quality and contextually responsive design. It should also support incremental growth through redevelopment of brownfield sites and/or infill sites. Any such developments should not encroach on the Green Belt, so that future generations can also enjoy the sense of freedom living on the edge of such natural beauty offers.”</p> <p>2.3 The NDP acknowledges that the “Core Strategy identifies Henley as one of eight Main Rural Centres where up to 90 new homes will be expected to be provided between 2011 and 2031 in order to assist the dispersed approach to housing provision across the district”. 2.4 The NDP sets out at paragraph 11.8 that “a total of 162 dwellings have been granted planning permission since 2011, many of which have already been built”. The NDP provides a table of committed developments since 2011 in the NDP area. 2.5 It can be seen that since 2011 only 39 affordable dwellings have been committed. It is not clear whether these have yet been delivered.</p> <p>Representations to Pre-submission Draft 4 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 2.6 Policy H1 (Housing Growth)</p>	<p>Noted</p> <p>The Local Planning Authority has confirmed that the housing requirement for 90 new dwellings has already been exceeded, therefore there is no residual housing requirement for the Parish.</p>	<p>None</p> <p>None</p>
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			<p>states: 1. The built up area boundary of Henley is defined by the Town Boundary as shown in Figure 2 on Page 16. New housing development within the Town Boundary will be supported in principle. 2. All areas outside of the Town Boundary are classed as Green Belt and countryside. New housing in the Green Belt and countryside will be strictly controlled and resisted in favour of development within the existing Town Boundary. New housing developments in general should be restricted to no more than ten dwellings per new development site unless there are very special circumstances which are endorsed by the JPC. 3. New housing developments should be prioritised in infill sites within the existing town boundary and only in very special circumstances, in appropriate cases on land to the south of the A4189 Warwick Road. 2.7 The supporting text to policy H1 (Housing Growth) considers the following with regard to affordable housing (para 11.6): “The NDP supports the creation of appropriate numbers of social and affordable housing within the joint parishes. Any such housing should be prioritised for local needs and for those with an existing connection to the joint parishes. Such housing should comply with the broader housing policies set out in this NDP. In particular, social and affordable housing should be located within the town boundaries as infill sites so as to ensure that they are properly integrated into the community. There is little or no desire amongst residents to see an isolated grouping of social housing on the periphery of the town, whether in the green belt or otherwise. Any such housing should instead be encouraged to be sited within the existing town boundary so that the residents of those homes are a seamless part of the Henley community.” *our emphasis</p>	<p>Noted. We question the value of just repeating what is in the NDP.</p>	<p>None</p>
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			<p>Representations to Pre-submission Draft 5 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 2.8 Stratford-on-Avon District Council published their Significant Comments on the previous iteration of the Neighbourhood Plan. Of particular relevance is the Councils acknowledgement that affordable housing need has grown, and no new affordable housing schemes have been developed in the town since the 2014 Housing Needs Survey. The comments state: “The level of local housing need (as evidenced by the most recent housing waiting list data – 102 households) appears to have grown significantly since the 2014 Housing Needs Survey. No doubt, in part at least, a reflection of the fact that no new affordable housing schemes have been developed in the town since the date of that Survey.” 2.9 In response to the Significant Comments from the District Council the Parish Council commissioned a Housing Needs Survey (HNS) the results of which were published in January 2020 (Appendix 2). Approximately 1750 survey forms were distributed to local residents and 215 were completed, either partly or fully, equating to a response rate of 12.29%. The Survey authors confirm within the HNS that the level of response is considered to be reasonable for a survey of this type. 2.10 The HNS identifies 19 households with a defined local connection looking for alternative accommodation. The survey has also identified that “at November 2019 there were 107 households with an address within Henley in Arden parish registered on the local authority housing waiting list”. 2.11 There is a clear need for affordable housing, given the level of demand on the housing waiting list, which has not been met in recent years (and is evidenced in the Neighbourhood Plans table of planning</p>	Noted	
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			<p>commitments and the comments of Stratford-on-Avon District Council). 2.12 The Stratford-on-Avon Core Strategy identifies Henley-in-Arden as one of eight Main Rural Centre's (MRC), along with Bidford-on-Avon, Kineton, Wellesbourne, Southam, Alcester,</p> <p>Representations to Pre-submission Draft 6 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 Studley and Shipston-on-Stour. These are the eight most sustainable settlements behind only Stratford-upon-Avon. 2.13 Henley-in-Arden is the only MRC's that has a railway station and provides an hourly train service to Birmingham. 2.14 It is acknowledged that Henley-in-Arden is located within the Green Belt, along with the MRC's of Studley and Alcester. There has been very little growth in Henley-in-Arden due to its location in the Green Belt. 2.15 However, there are mechanisms for the release of Green Belt land for development in exceptional circumstances via Strategic Green Belt reviews through the Local Plan process. These are matters for review of the Plan – this Plan should not add on other layer of restrictive development plan policy for meeting those needs. 2.16 The protection of Henley-in-Arden is a burden on sustainable development. 2.17 It is evident that this lack of growth is impacting the availability of affordable housing in Henley-in-Arden (see para 2.8 above which demonstrates the increase in demand and lack of delivery). Brownfield Land 2.18 The NPPF considers that policies and decisions should “promote an effective use of land in meeting the need for homes”, in doing so, they should make “as much use as possible of previously-developed or ‘brownfield’ land”. 2.19 The Stratford-on-Avon Brownfield Register update (January 2020)</p>	<p>We question the assertion that the NDP adds another layer of restriction.</p> <p>The NDP has to be in general conformity with the Core Strategy and can add additional detail as it is choosing to do.</p> <p>Whatever the extent of recent house building, the fact is that the Parish is not required to promote further commercial or residential</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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			<p>(Appendix 3) identifies one site in Henley-in-Arden. These are set out in table 1:</p> <p>Representations to Pre-submission Draft 7 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 Table 1: Brownfield Register sites in Henley-in-Arden Site Name and Address Size (ha) Dwelling capacity Planning Ref. Mayfield Farm, Bear Lane, Henley-in Arden 0.65 8 15/03517/OUT 2.20 It is clear that currently, the evidence shows that there is not enough brownfield land in Henley-in-Arden to address the housing need. Growth in Henley-in-Arden 2.21 An assessment of the potential directions of growth (see Constraints Plan at Appendix 4) identifies that there are limited growth options for Henley-in-Arden. 2.22 As identified above, the settlement is surrounded by Green Belt. To the north the settlement is constrained by a large area of flood risk. As well as Beaudesert Park School and Henley Golf Club. 2.23 To the east there is the Beaudesert Castle Scheduled Ancient Monument (SAM). There is a band of steep topography which runs north-south and would be an impediment to future development to the west. 2.24 To the south of Henley is further areas of flood risk, Henley in Arden School, Arden House Conference Centre and Warwickshire College and Henley Sports Pavilion. Beyond this is an area of undeveloped greenfield land before further residential land. 2.25 To the west, beyond the railway line, there is some areas of flood zone. However, there is relatively unconstrained land (other the Green Belt designation). 2.26 It is evident from this assessment, that any future growth of Henley-in-Arden will need to be directed to the west of the settlement, beyond the railway.</p>	<p>development. Given the significant impediments to development in the Parish, including but not restricted to the scale of the Green Belt, the NDP has gone as far as it can under these circumstances.</p> <p>In the event of these circumstances changing, the NDP will be reviewed.</p> <p>Noted.</p> <p>The NDP supports the development of brownfield sites through its vision (10.11) and through Policy H1 which</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>Representations to Pre-submission Draft 8 Framptons Beaudesert and Henley-in-Arden Neighbourhood Plan Town Planning Consultants HIA Developments LLP August 2020 GM/10053 2.27 Appendix 5 shows the range of facilities available within 1km of the land to the west of Henley-in-Arden. It can be seen that the town centre is accessible within this distance, which includes a variety of retail, employment, eating and community facilities. It is also located adjacent Henley-in-Arden Rail Station, which provides hourly services to Birmingham. Moreover, within the 1km distance is Henley Sports Pavilion, Warwickshire College and Henley-in-Arden School. Conclusions 2.28 The Stratford-on-Avon Core Strategy identifies Henley-in-Arden as one of eight Main Rural Centre's (MRC). These are the most sustainable settlements behind only Stratford-upon Avon. Henley-in-Arden is the only MRC's that has a railway station and provides an hourly train service to Birmingham. 2.29 It is acknowledged that Henley-in-Arden is located within the Green Belt. There has been very little growth in Henley-in-Arden due to its location in the Green Belt. The protection of Henley-in-Arden is a burden on sustainable development. 2.30 It is evident that this lack of growth is impacting the availability of affordable housing in Henley-in-Arden (see para 2.8 above which demonstrates the increase in demand and lack of delivery). 2.31 Henley-in-Arden is heavily constrained for future growth. Notwithstanding that the settlement is surrounded by Green Belt, there are topographical, heritage and flooding constraints which are an impediment to future growth to the north, east and south, which therefore directs future growth to the west of the settlement, beyond the railway. 2.32 It is submitted that the NDP should not attempt to provide an unjustified layer of additional constraint to restrict all development outside</p>	<p>prioritises development on brownfield sites.</p> <p>Noted</p>	<p>None</p>
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				<p>the development boundary. There are mechanisms for the release of Green Belt land for development in exceptional circumstances via Strategic Green Belt reviews through the Local Plan process.</p> <p>These are matters for review of the Plan – the Neighbourhood Plan should not add on another layer of restrictive development plan policy for meeting those needs. 2.33 It is respectfully submitted that Neighbourhood Plan is seeking to add an unnecessary layer of restrictive development plan policy which is inappropriate and will restrict future sustainable growth around Henley-in-Arden. Framptons August 2020</p>	<p>Restrictions to development outside the Settlement Boundary is a matter that is covered in the Core Strategy and NPPF. The NDP adds no further unreasonable constraints.</p>	
10		Warks Police	Various	Place Partnership Limited Placepro House, Unit 6 Berkeley Business Park Wainwright Road, Worcester.	Noted	None

			<p>WR4 9FA contact@placepartnership.co.uk  www.placepartnership.co.uk Tel: 01905 673190 VAT  Registration Number 215590907 Registered in England  &amp; Wales 09484378 Regulated by RICS Beaudesert &amp;  Henley-in-Arden Joint Parish Council 150 High Street  Henley-in-Arden B95 5BS Our Ref: P/H/Div/0024/20 27  August 2020 Dear Sir or Madam, Beaudesert &amp; Henley-  in-Arden Neighbourhood Development Plan – Regulation  14 Re-Consultation Notice Place Partnership (PPL) is  instructed by Warwickshire Police (WP) to submit  representations to the public consultation on the  Beaudesert &amp; Henley-in-Arden Neighbourhood  Development Plan (B&amp;HANDP). The B&amp;HANDP, when  ‘made’, will provide the planning framework for the Joint  Parish over the next ten years. Its policies will therefore  be critical to ensuring that developments are safe and  accessible, so that crime and disorder, and the fear of  crime, do not undermine quality of life or community  cohesion, as required by paragraphs 91 (b) and 127 (f)  of the National Planning Policy Framework (February  2019) (NPPF). Therefore the purpose of this response is  to propose amendments that will enable the B&amp;HANDP  to promote design measures that will reduce crime,  enable the delivery of infrastructure for new  developments that will support the emergency services  and ensure suitable access is provided for ‘blue light’  vehicles in the event of incidents.</p> <p>It is in this positive and constructive spirit that WP would  like to submit representations in relation to the following  parts of the B&amp;HANDP:</p> <p>Policy H1 – Housing – Page 14 Under the Stratford-on-  Avon District Core Strategy (adopted July 2016), 90  homes are to be provided in Henley-in-Arden up to Plan</p>	<p>Noted</p> <p>Agreed. Reference  to Secured by  Design will be  made.</p>	<p>None</p> <p>Change to be  made as  indicated.</p>
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				<p>Period 2031. However, whilst Policy H1 of the B&amp;HANDP focuses on ensuring that new development will not be detrimental to the historic character of the town and its conservation area, it does not mention the importance of Secured by Design (SBD) and emergency services infrastructure, which will be necessary for maintain a crime free and safe environment for the Parish and the new residential developments in the area. In view of this, WP suggest that the following paragraph should be included within the explanation for this policy: 11.11 Applicants or developers proposing new homes must show how they have responded to the guidance provided through Stratford-on-Avon District Council Developments 2 Requirements Supplementary Planning Document, Secured by Design and the Lifetime Homes Standard. New housing must also provide the required infrastructure where necessary, such as for the emergency services. The inclusion of the requested new paragraph would be in accordance with 91 (b) and 20 of the NPPF. It would also confirm that potential applicants for residential development are adhering to point 7 and paragraph 3.8.5 of Policy CS.9 – ‘Design and Distinctiveness’, whereby proposals will help to incorporate measures to reduce crime and the fear of crime through SBD principles. To give a brief summary of SBD, it is a long-running flagship initiative of the National Police Chiefs’ Council (formally Association of Chief Police Officers). Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous public bodies (including Warwick District Council) and professional bodies. SBD is therefore a vital guidance resource for planners. SBD was created in 1989, is available online, regularly updated and consequently there is no danger of it ceasing to exist during the lifetime</p>		
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			<p>of the Neighbourhood Plan. Incorporating SBD though will not though negate the need for additional emergency services infrastructure in relation to new developments. Not least because there is no statutory power under which police, fire &amp; rescue and ambulance services could be reduced because a given scheme incorporated SBD. This fact further underpins the requested amendment above. The Independent Examiner and the Joint Parish Council should be aware that applicants can obtain free specialist advice and guidance with regards to SBD from WP's dedicated Design Out Crime Officer. The following paragraph should be included after the proposed paragraph above to reflect this: 11.12 Applicants can seek guidance from Warwickshire Police's Design Out Crime Officer about Secured by Design, who will provide specialist advice on the security, design and refurbishment of developments to create crime free and safe environment.</p> <p>Policy H2 – Infrastructure Criteria – Page 16 Although it is beneficial to ensure existing infrastructure is not affected by new residential development, WP are disappointed that the policy does not consider the impact of an increase in population to Henley-in-Arden will have on the emergency services. The proposed development of 90 dwellings up until plan period 2031 will effectively be creating a new community within the town that will require policing and fire services to respond to an increase in 999 and 101 calls. Whilst there is a fire station located within the area, there will be a need to either create a new police post or fund the current Safer Neighbourhood Team from the increase in housing. Therefore, the following bullet point is requested by WP:</p> <ul style="list-style-type: none"> <li>• To promote a safe environment for existing and future residents by ensuring that new developments</li> </ul>	<p>The additional 90 homes referenced here have already been granted planning permission so the opportunity is not there to influence these dwellings.</p> <p>Furthermore, the proposed words merely reflect existing policy within the NPPF and Core Strategy</p>	<p>None</p> <p>None</p>
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			<p>incorporate provision for emergency services infrastructure where necessary. The above amendment would be in accordance with paragraphs 8, 16, 20, 28, 38, 91, 92, 95 and 127 of the NPPF. Conversely, crime and community safety are key planning considerations to ensure that the Joint Parish maintain a crime free and safe environment, which is in line with Policy CS.9 of Stratford-on-Avon District Council Core Strategy.</p> <p>3 Policy B1 – Development Criteria and Policy B4 – Design Quality – Pages 25 and 26 Whilst WP support Policy B1 in setting the out the criteria that new developments are expected to meet within the Neighbourhood Plan Area and Policy B4 for making reference to Lifetime Homes (2012), both policies fail to make reference to SBD principles, which is a key factor in maintaining safe communities. Given the above, the following amendments are proposed: Policy B1 h. Make reference to Secured by Design and where necessary, emergency services infrastructure.</p> <p>Policy B4 Favourable consideration will be given to housing proposals that can demonstrate the principles of Secured by Design and make use of the Design Requirements Supplementary Planning Document (July 2020) within the Design and Access Statement. Proposals should also evaluate against the Building for Life (2012), with all criteria achieving a ‘Green’ Score. Developments which include a ‘Red’ or ‘Amber’ score against any criterion must be justified in the Design and Access Statement or other supporting statements. Making the suggested amendments for both policies would be wholly compliant with the NPPF. Paragraphs 8, 26, 32 and 92 together confirm that sustainable development means securing a safe environment</p>	<p>and do not add any further local detail.</p> <p>Agreed</p> <p>We will create a new design policy incorporating elements of H2, B1 and B4.</p> <p>As above</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated</p>
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			<p>through the delivery of social infrastructure needed by communities. In this respect, paragraph 20 specifically states policies should deliver development that makes sufficient provision for security infrastructure. Paragraphs 16, 26, 28, 32 and 38 collectively envisage this being delivered through joint working by all partners concerned with new developments. This is expanded on by paragraph 95, which states planning policies and decisions should promote public safety and security requirements by using the most up-to-date information available from the police; who are essential local workers providing frontline services to the public, according to Annex 2 of the NPPF. The above policy requirements are included because the NPPF seeks environments where crime and disorder and the fear of crime do not undermine quality of life, the health of communities and community cohesion (paragraphs 91 and 127). Planning policies and decisions are expected to deliver this; an assertion confirmed by the appeal decisions summarised in Appendix 1.</p> <p>Overall, WP wishes to emphasise that they welcome the opportunity to submit comments to the B&amp;HANDP and look forward to continuing this positive constructive dialogue with the Parish Council. Should there be any queries about the response, please do not hesitate to contact us and we would be pleased to assist. 4 Yours faithfully Emily Kingswell Graduate Planner Direct Dial: 07711 188266 Email: emily.kingswell@placepartnership.co.uk “Without prejudice to any other obligation imposed upon it, it shall be the duty of each local authority to exercise its various functions with due regard to the likely effect of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area: Section 17(1) of</p>	Noted	None
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				the Crime and Disorder Act.” Enc. 5 Appendix 1 Examples of Appeal Decisions Supporting the Police		
11		Natural England	General	<p><b>From:</b> SM-NE-Consultations (NE) &lt;<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>&gt; <b>Sent:</b> 29 July 2020 13:59 <b>To:</b> Parish Clerk &lt;<a href="mailto:clerk@henley-in-arden-pc.gov.uk">clerk@henley-in-arden-pc.gov.uk</a>&gt; <b>Subject:</b> NE Response 323387: Neighbourhood Development Plan 2020 Regulation 14 Public Re-Consultation Notice</p> <p>Dear Mr Evans,</p> <p><b>Beaudesert and Henley-in-Arden Neighbourhood Development Plan 2020 - Regulation 14 Public Re-Consultation Notice</b></p> <p>Thank you for your consultation.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p>	Noted	None

				<p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p> <p>Yours sincerely</p> <p>Victoria</p> <p><b>Victoria Kirkham</b>  Operations Delivery  Consultations Team  Natural England  County Hall  Spetchley Road  Worcester WR5 2NP</p>		
12		Stratford DC	Policies Section	<p>The Plan does not present any proposals to rectify the shortages of certain types of open space noted in AS.4 of the Core Strategy. This will act as a constraint to residential development, so needs to be addressed.</p>	<p>No policies are mandatory in a NDP. Given that there is no residual housing requirement for the Parish and the NDP does not allocate any sites for development, this matter should be addressed in any future review of the NDP.</p>	None
13			Maps	<p>A policies/proposals map appears to be missing. A map showing the constraints/designations and policies of the Plan for the entire Neighbourhood Area should be provided. This should also make clear the extent of the designated Neighbourhood Area.</p>	<p>Individual policy maps are provided and a map of the neighbourhood area is shown on</p>	None

					page 6. This is deemed to be sufficient.	
14			Section 9 – Core Strategy	<p>The relationship of the Plan to specific policies in the Core Strategy is not clearly explained. Section 9 does not include substantive content in this respect.</p> <p>This omission may present difficulties in terms of demonstrating statutory ‘basic conditions’ compliance unless this issue is addressed.</p> <p>It is recommended that each policy is accompanied by a list of the relevant Core Strategy policies and sections of the NPPF to show the relationship of the NDP policies to existing local and national planning policy.</p>	<p>Section 9 will be extended to describe the relationship between the Core Strategy and the NDP.</p> <p>It is not considered necessary to link each NDP policy to the local and national planning policy framework. This is the job of the Basic Condition Statement.</p>	<p>Change to be made as indicated.</p> <p>None</p>
15			Section 10 – Vision Statement: Cultural Landscape	Is this heading utilising the correct or most appropriate terminology? Most of the features identified are heritage assets, with the exception of the Green Belt.	Yes, this is an appropriate description of the NDP aims as reflected in the Vision.	None
16			Section 10 – Vision Statement: Traffic and Transport	It is considered that this section should make it clear that these are not policies, since they are aspirations only and will therefore not be assessed during the Independent Examination of the Plan.	Paragraph 10.2 makes it clear that the NDP contains aspirations as well as planning policies and this is felt to be sufficient.	None
17			Section 10 – Vision	There is a concern that the Plan as presently drafted does not appear to adequately address the issue of how	The narrative in section is	None

			Statement: Sustainable Residential Development	locally-identified housing needs will be addressed (please see general comment on 'Housing' below). It is recommended that the text in the section on 'Sustainable Residential Development' be revised to explain how the Plan could more effectively address identified local housing need.	considered to satisfactorily address the issue by explaining that development on brownfield sites and/or windfall is supported.	
18			Vision Statement	Where is the vision statement underpinning the 'Built Environment' topic area/policies?  How do these objectives align themselves with the 5 chosen topic areas within the Plan? Should they be listed under the topic area headings, to create a better understanding of the relevance of each objective and the continuity of the thoughts and ideas throughout the document?	Agreed	Change to be made as indicated
19			Housing General –	Recent data from the 2020 Housing Needs Survey shows a significant level of housing need, with 19 households with a defined local connection looking for alternative accommodation in Beaudesert and Henley-in-Arden, and 107 households with an address within Henley-in-Arden parish registered on the District Council's housing waiting list. It is recognised that the town is subject to significant Green Belt and other constraints. Nevertheless, there is scope for the local community to promote Local Need housing schemes to address the identified local housing need, and the Plan provides an ideal platform for achieving and demonstrating consensus within the local community as to where such scheme(s) might be located.  It is not clear why there is no policy within the Plan for 'rural exception', social or affordable housing, to take account of potential future local need. Other	We will include a policy on Rural Exception Sites  As above	Change to be made as indicate  None



				<p>Neighbourhood Plans within the Green Belt have embraced this opportunity.</p> <p>Paragraph 6.4.16 of the Henley-in-Arden Area Strategy within the Core Strategy relating to housing distribution and Reserve Sites has also not been addressed in the Plan.</p> <p>The above situation could be addressed by modifying the Plan prior to submission stage. However, it is strongly recommended that this is only done following close consultation with this Authority and, where appropriate, the Rural Housing Enabler.</p>	<p>The NDP confirms that the 90-dwelling housing target has been exceeded. There is nothing further to address as the Preferred Options SAP currently out for consultation does not identify any reserve sites in the Parish.</p> <p>Noted.</p>	<p>None</p> <p>None</p>
20			<p>Housing – preamble: Green Belt and Rural Setting</p>	<p>Fifth paragraph – Green Belt policy also affords protection against new employment sites, which should be acknowledged. Additionally, this paragraph appears to contradict the second paragraph of this section ('some' vs 'significant' protection). 'Significant protection' is more accurate.</p> <p>The sentence "Residents are keen to preserve the railway line as the natural boundary..." A small section of</p>	<p>We do not think it is appropriate to reference employment sites in a section on housing.</p> <p>We will ensure that the references to protections afforded by the Green Belt is described as 'significant'</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>None</p>

				the BUAB includes a parcel of land to the west of the railway line. Is there a conflict here?	There is no contradiction to the general desire to retain the railway line as a boundary.	
21			Housing – preamble: Scale of Residential Development	First paragraph – fails to inform the reader about national policy restrictions in relation to Green Belt. It is considered this should be made clear, for clarification and consistency of approach.	This is not essential	None
22			Housing – preamble: Social & Affordable Housing	<p>There appears to be a disconnect between Policy H1 and its relationship to the preamble, especially the section headed ‘Social &amp; Affordable Housing’.</p> <p>The explanatory text at Section 11.6 includes the statement that “<i>Any such housing should be prioritised for local needs and for those with an existing connection to the joint parishes.</i>” There therefore appears to be a clear local preference for the allocation of all new affordable homes to people with a qualifying local connection in the first instance. However, this Section itself does not amount to a policy. Indeed, it does not appear to relate to any specific policy within the Plan. In the absence of a specific policy on this matter, the Priority Nominations arrangements outlined in the Development Requirements SPD will apply. This could, in certain circumstances, result in homeless households without a local connection to Beaudesert and Henley-in-Arden being nominated to tenancies of new affordable homes in preference to people with a local connection. It would be useful for the Joint Parish Council to confirm if they are content with this ‘default’ approach. If not, a new policy (or policy criterion) should be included to give effect to the</p>	Agreed. We will include a local policy on rural exception sites.	Change to be made as indicated.

				principle included in Section 11.6, so as to take precedence over the arrangements described in the SPD.		
23			Policy H1 – Housing Growth	<p>The basis on which the Built-up Area Boundary [BUAB] has been defined requires clarification.</p> <p>The Policy refers throughout to the ‘Town Boundary’ whereas associated Figure 2 refers to a ‘Development Boundary’ and the Core Strategy refers to the ‘Built-up Area Boundary’. There needs to be some consistency of terminology. Would ‘settlement boundary’ be more appropriate, if ‘built-up area boundary’ is not deemed acceptable? The terms ‘Town boundary’ and ‘Development boundary’ may mean different things to different parties/organisations.</p> <p>Second paragraph: The wording of this paragraph in relation to appropriate development in the Green Belt should be brought in line with wording in the 2019 NPPF and Core Strategy. It is unclear whether or not the second paragraph of the Policy applies only inside the BUAB/settlement boundary or throughout the Plan area.</p> <p>If only within the settlement, there does not appear to be reasoned justification for an arbitrary limit of 10 dwellings unless ‘very special circumstances’ exist. This will, in practice, place an artificial limitation on affordable housing supply (see further below). Where is the evidence to support this figure? Shouldn’t this be dictated by the site size and efficient use of land? Would this mean that any new apartments or conversion to apartments over 10 would be resisted? This appears to be a very restrictive policy.</p> <p>Furthermore, the District Council is the determining</p>	<p>Noted</p> <p>We will ensure that the correct, consistent term is used in the submission version of the NDP (Settlement Boundary).</p> <p>We will clarify this in the Submission version of the NDP. The policy applies across the neighbourhood area.</p> <p>Agreed. We will replace the figure 10 with ‘small-scale development’.</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>

				<p>authority, not the Parish Council, so the reference to the JPC here is inappropriate.</p> <p>Third paragraph, last phrase – it is presumed it means land outside the BUAB and within the Green Belt. That being the case, there is no provision in the Core Strategy to revise Green Belt boundaries to accommodate market-led housing schemes, and housing to meet a local need is already provided for in Core Strategy Policy CS.10 so very special circumstances wouldn't need to be applied. Clarification is critical as this is a significant issue.</p> <p>The reference in the third paragraph to development on land south of the A4189 Warwick Road seems inappropriate as all the land immediately to the south of Warwick Road within the Neighbourhood Area is located within Flood Zones 2 or 3 (the vast majority being within Flood Zone 3), wherein residential development would normally be unacceptable.</p>	<p>Agreed. This reference will be removed.</p> <p>Agreed. This reference will be removed.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
24			Policy H1 - Explanation	<p>It is appreciated that the town is surrounded by Green Belt and sensitive countryside, and that its strategic housing requirement <i>may</i> already have been met (although this point is not clear in the Plan). Nevertheless, and notwithstanding references in the section headed 'Social and Affordable Housing', it is not clear that the Plan "<i>supports the creation of appropriate numbers of social and affordable housing</i>".</p>	<p>Agreed. We will remove this reference.</p> <p>Noted. We will clarify that the Parish has exceeded its housing requirement.</p>	<p>Change to be made as indicated.</p>

				<p>Indeed, it appears that there is little realistic prospect of new affordable housing being secured on sites within the settlement boundary, especially if (a) schemes of more than 10 dwellings or (b) conversion of business premises to residential in the Conservation Area are ruled out. Attention is drawn to the site size thresholds in Policy CS.18 of the Core Strategy.</p> <p>The above situation is set in the context of 107 households on the Council's housing waiting list with a Henley-in-Arden address (as at January 2020). The 2020 Housing Needs Survey also identified 19 households with a defined local connection looking for alternative accommodation in Beaudesert and Henley-in-Arden.</p> <p>A more positive approach would be to highlight the scope for 'Local Needs' schemes within the scope of Core Strategy Policy CS.15(G). Provided all the relevant criteria are met, there is scope for delivery of such schemes outside the settlement, within the Green Belt.</p>	<p>Noted. We will include a policy relating to Rural Exception Sites.</p>	<p>Change to be made as indicated.</p>
25			Paragraph 11.10	<p>This paragraph seems to provide additional policy criteria for the design of development rather than explanatory text, and it is not clear how it relates to Policy H1.</p>	<p>Agreed. We will move this narrative into a newly written design policy.</p>	<p>Change to be made as indicated.</p>
26			Policy H2	<p>"All new housing developments must demonstrate, through the submission of appropriate evidence, that existing infrastructure would not be adversely affected". This assumes that capacity cannot be increased and will remain constant, suggest adding "or that additional capacity will be provided where necessary".</p> <p>The policy states that <i>all</i> new housing development</p>	<p>Agreed. We will create a new design policy incorporating elements of H2, B1 and B4.</p>	<p>Change to be made as indicated.</p>

			<p>should meet certain criteria – this seems onerous. Does this only apply to new build or does it include conversions, too? Would the criteria be appropriate for conversions?</p> <p>First bullet point – the District Council is the determining authority, not the Parish Council. Therefore, to say “where suggested by the JPC” is inappropriate. If you wish to identify places where hydrological surveys are appropriate, the place to do it would be in the NDP.</p> <p>Fourth bullet point (residential energy efficiency): There is concern that the criteria are too vague to enable their effective application. If it meets Building Regulations does it comply?</p> <p>Fifth bullet point: Conversion of business premises in the Conservation Area into residential dwellings could be Permitted Development [i.e. does not require prior planning consent] in certain circumstances. It also does not align with the direction of Government policy in this regard. Additionally, the point doesn't fit in with the thrust of the policy and should be removed. Finally, this point appears to conflict with Policy E1 relating to the Protection of Existing Employment Sites.</p> <p>Sixth bullet point (parking): SDC's latest parking standards are now adopted so should prevail unless different standards can be justified based on local circumstances. The way this bullet point is worded is confusing as there are two different sets of standards provided.</p>	<p>Agreed. We will add in 'where appropriate' and state that these criteria are supported.</p> <p>Agreed. We will remove this reference.</p> <p>We will rephrase this bullet point to make the policy intent clearer.</p> <p>Agreed. We will add to the policy 'where this would cause significant harm to residential amenity'.</p> <p>We agree and will revert to the adopted policy</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated</p>
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27			Policy H2 – Explanation	The explanatory text refers to flood risk specifically, not infrastructure, generally.	Text to be rewritten to be broader in scope, in line with the policy	Change to be made as indicated
28			Economy – Strategic Objective	The wording of the objective suggests it is only intending to support tourism activity, however the subsequent policy wording does not support this.	Agreed. We will extend the scope of this statement.	Change to be made as indicated.
29			Policy E1	<p>Criterion a) may need some clarification as to whether the sufficient supply of sites referred to is within Henley or District wide. The Development Management Considerations to Core Strategy Policy CS.22 state “employment land in the locality”.</p> <p>Criterion b) ‘capable’ - how would this be assessed? Do you mean that the site is no longer viable?</p>	<p>This refers to the neighbourhood area as do all policies in the NDP. We cannot influence policies outside of this area. However, we will make this absolutely clear.</p> <p>Yes, we mean viable and will amend accordingly.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
30			Policy E2	<p>It would be helpful if the policy referred to provisions of Policy CS.10 in Core Strategy regarding provision of employment uses to meet an identified local need. Such development would not be inappropriate development in the Green Belt if fully justified.</p> <p>The Explanatory text: Where would this be located? The text suggests it would be outside of the Town Boundary. If this would be in the Green Belt, it would be contrary to national Policy [see paragraph 145 of the NPPF 2019].</p>	<p>We consider the policy to be clear as it is. There is no requirement to reference Core Strategy policies.</p> <p>The narrative says ‘subject to overarching planning policies’ so is not contrary to national policies.</p>	<p>None</p> <p>None</p>

31			Policy E4	This policy repeats the fourth bullet point in Policy H2, is it necessary as a separate policy?	Policy H2 is to be reformatted as part of a wider design policy	Change to be made as indicated.
32			Policy E5	This policy may not be enforceable/relevant to certain types of telecommunications equipment if it is Permitted Development.  Suggested to include criteria "It would comply with Green Belt policy"	Agreed	Change to be made as indicated
33			Policy E5 – Explanation	There is no explanatory text for this policy.	Agreed. We will combine E4 and E5 and amend the explanatory text to cover both aspects.	Change to be made as indicated.
34			Policy E6	It has been clarified that this Policy applies to new dwellings within the Town Boundary. However, it is unclear why this policy does not apply to all new homes. The scope of the policy should be clarified.	Agreed. The policy will be revised to apply to all new homes in the neighbourhood area.	Change to be made as indicated.
35			Policy E7	Alternative wording for criterion d) which has been included in a number of 'made' neighbourhood plans could be: "They are in locations where housing development would be acceptable".  Other 'made' Plans which have incorporated a policy on live-work units have also included an additional criterion "They shall not adversely impact on neighbouring amenity". It is suggested this is included, as it is essential to ensure the potential work use would be acceptable to neighbouring dwellings/uses.  Suggested to include criteria "It would comply with Green Belt policy"	Agreed	Change to be made as indicated.



36			Policy C1	<p>Refers to “Protecting and enhancing existing community assets/facilities, of the like described in the Explanation”. A brief list of the types of community assets/facilities should be included, otherwise it could suggest it only applies to the facilities discussed in the Explanation.</p> <p>The policy itself seems to have a lighter touch than the Core Strategy, with less robust wording. The NDP says the loss of existing community facilities will be resisted unless it can be demonstrated that the facility is no longer viable or in active use and has no prospect of being bought back into use. Compared to Core Strategy Policy CS.25 which requires active marketing to show the use is not viable, with no realistic prospect of the use continuing. In addition the Core Strategy also allows the discontinuance of use where there are overriding environmental benefits – the NDP doesn’t include this provision, so would the NDP override the CS if a proposal sought to remove a community asset on grounds of negative environmental impact? The NDP wouldn’t support it, but the Core Strategy would.</p> <p>Consider inserting further policy that supports facilities being provided targeted at the 10-16 year old age group, to tie in more with the explanation or remove the wording from the explanation?</p>	<p>Agreed</p> <p>Agreed. We will strengthen the policy.</p> <p>Agreed. We will include reference.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
37			Policy C2	<p>Proposed Local Green Spaces need to be thoroughly justified in accordance with NPPF/PPG.</p> <p>Each proposed site needs to be fully justified against the criteria set out in paragraph 100 of the NPPF 2019. There is no justification in the Plan. This work is crucial</p>	<p>Agreed. The evidence base has been updated.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>

				<p>evidence for the assessment of suitability. It is <b>vital</b> that site assessments are undertaken of each proposed Local Green Space to demonstrate that they are appropriate for designation, in accordance with the criteria set out in the NPPF. This policy will be unlikely to meet the statutory Basic Conditions without evidence to support the designation of the proposed Local Green Spaces. Site assessments for each proposed Local Green Space should be undertaken, and added as an Appendix to the Plan.</p> <p>LGS 1 appears to be designating the Scheduled Ancient Monument. It already has significant protection from development (see NPPF paragraph 194), so it is unclear what the purpose of designation as an LGS would be.</p> <p>LGS 6 is situated partly outside of the designated Neighbourhood Area. The NDP cannot control development outside of its designated boundaries, so this site needs to be reconsidered.</p> <p>The boundaries of the Local Green Spaces should be outlined more clearly, to make the map more readable. In particular, LGS 5 should be provided as a zoomed in section, as it is difficult to see the exact extent of it due to the size of the map.</p>	<p>Agreed. Full justifications will be provided.</p> <p>The purpose of a LGS designation is to highlight its importance locally, not just to afford additional protection.</p> <p>This is understood. The line will be redrawn to clarify that it is only land within the neighbourhood area that can be designated.</p>	<p>None</p> <p>Change to be made as indicated.</p>
38			Policy C2 – Explanation	The paragraph acknowledges that Local Green Space should be ‘robustly justified’ but the Plan fails to provide any such justification. This is a critical requirement.	Agreed. Full justifications will be provided.	Change to be made as indicated.

			Policy C3	Second paragraph – what are ‘such facilities’? This needs to be clarified.	It refers to the existing facilities at the Memorial Sports Ground.	None.
39			Policy N1	As written, the first element of the policy seems to be seeking to preserve the rural surroundings [of the settlement?] This appears to be more related to design which suggests it should not be part of this policy or the ‘Natural Environment’ section of the Plan. The second part of the policy is missing a word(s) and does not currently make sense. The second element of the policy as drafted does not suggest how tranquillity would be achieved or how development would be assessed to comply with the policy. This needs clarifying.	Agreed. Policy to be deleted.	Change to be made as indicated.
40			Policy N2	<p>SDC have now adopted the Part V: Climate Change Adaptation and Mitigation of the Development Requirements SPD, which requires applicants to provide a certain number of climate change mitigation/adaptation measures (including renewable energy) depending on the type and scale of development. It is suggested that this policy refers to the document within the Explanatory Text.</p> <p>Whilst the policy states that it supports proposals for renewable energy developments, the policy as written appears to be more concerned with the visual impact of renewable energy technologies than with promoting their use.</p> <p>Second paragraph: Suggest re-wording as follows: ‘<del>Plans coming forward</del> <u>New development</u> should ensure that adverse impacts are addressed, including cumulative landscape and visual impacts <del>and are not in conflict with any other policies in this Plan.</del>’ The entire paragraph as currently drafted, reads that the</p>	Agreed. The policy will be re-written to reflect these changes.	Change to be made as indicated.

				NPPF states this - it doesn't - this could be made clearer by inserting a full stop after "paragraph 147 of the National Planning Policy Framework 2019".		
41			Policy N3	<p>Whilst not inappropriate, the policy as drafted does not encourage the planting of new trees and hedges in new developments. Set out below is an alternative policy on the same topic which is from a 'made' neighbourhood plan that has passed Examination, which might be worthy of consideration:</p> <p>"All new development will be encouraged to protect all trees and hedges where appropriate, as per BS 5837: 2012 Trees in relation to design, demolition and construction or as subsequently revised or replaced. Where this is not appropriate, new trees and hedges should be planted to replace those lost. <u>Most new developments should incorporate appropriate new tree and hedge planting of a suitable size and species in their plans. The new hedge or shrub planting should be implemented as per the recommendations in BS 4428:1989 Code of practice for general landscape operations and any new tree planting should be carried out in accordance with BS 8545:2014 Trees from nursery to independence in the landscape or as subsequently revised or replaced.</u></p> <p><u>Relevant new development proposals will be expected to demonstrate that they have, where possible, had regard to appropriate sustainable landscaping, in order to avoid later retrofitting of poor quality or token landscape design".</u></p>	Agreed. The policy will be re-written to clarify its intent and to support the creation of new habitats.	Change to be made as indicated.
42			Policy N4	There is an inherent confusion in this policy, as it seems to cover landscape features, landmarks, views, skylines and landscapes. It is suggested deleting referencing to 'skylines' in the policy as the explanation/justification for	Agreed. The policy will be re-written to take these points into account and to	Change to be made as indicated.

			<p>the policy is based on landscape importance, including views, not 'skylines'.</p> <p>In addition, the list of views to be protected should be set out within the policy itself.</p> <p>Development proposals should demonstrate more than 'regard to the local landscape character'. Suggest phrase is replaced with '<u>take fully into account</u>'.</p> <p>It is considered that the second paragraph of the policy does not provide sufficient flexibility, as it suggests that any adverse impact (no matter how small) would be unacceptable regardless of the potential benefits of a development proposal. Suggest amending the second sentence to: "<u>Where development would have a significant adverse effect on these Valued Views it will only be permitted where the benefits of the proposal clearly outweigh the harm.</u>"</p> <p>The valued landscapes/ views identified need to be fully justified in order to assess whether the protection of the landscapes/views would be appropriate. This work is <b>crucial</b> evidence to assess their suitability. The policy will be unlikely to meet the Basic Conditions without appropriate justification of each proposed valued landscape/view. This should provide evidence of why they should be protected, and preferably photographs to illustrate each view. These assessments should be provided as an Appendix to the Plan.</p>	<p>offer a detailed justification for the important views identified.</p>	
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				The explanation should make it clear that the Landscape Sensitivity Assessment was produced for Stratford-on-Avon District Council.		
43			Policy B1	<p>It is not considered that all the bullet points would fit under the policy heading of 'development criteria'. The policy appears to be made up of a disparate collection of criteria that would be more appropriate for other parts of the Plan, since they refer to issues of heritage, landscape and design.</p> <p>First sentence - "Where applicable" – where would they be applicable?</p> <p>Criterion f) with reference to building heights – should there be a requirement to justify a need/why a proposed building may need to be higher than existing building heights as a small increase may not cause harm and some areas may have variation?</p> <p>Criterion g) as drafted reads as being 'judgemental' and suggests buildings earmarked for replacement are already incongruous, which may not be the case. Suggest rewording as: "be designed to complement or enhance the historic character by adhering to high quality design principles as set out in the District Council's Development Requirements Supplementary Planning Document or its successor document".</p>	Agreed. We will prepare an additional policy incorporating design elements from H2, B1 and B4.	Change to be made as indicated.
44			Policy B2	<p>Some conversions may be classed as Permitted Development so in such circumstances it would be difficult to control in terms of criteria set out.</p> <p>Suggest including "<u>complies with Green Belt policy</u>" as a criterion.</p>	Agreed. The policy will be re-written to clarify the policy intent and additional justification will be provided.	Change to be made as indicated.

				The policy justification/explanatory text is brief and does not provide evidence of “residents’ wish” in terms of e.g. Neighbourhood Surveys.		
45			Policy B3	Demonstrating adequate means of foul drainage, as required by the Policy, may not be relevant to all new development and consequently, the policy does not have regard to Paragraph 44 of the NPPF that “Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question”.	Agreed. Will add in ‘where appropriate’	Change to be made as indicated.
46			Policy B4	<p>The relationship to Core Strategy Policy CS.9 is unclear, and should be explained.</p> <p>It is noted that previous reference to the Lifetime Homes Standard has been deleted. This effectively means that the focus of the Policy is on urban design and the public realm. However, it means that the policy as it currently stands does not address issues around accessibility and flexibility of new homes. The default position is that the provisions of CS Policy CS.19 Part D apply.</p> <p>It is unclear why this isn’t applicable to all forms and locations of development, particularly given the settlement is surrounded by Green Belt and the development of greenfield sites is highly unlikely.</p> <p>Paragraph 2: “Favourable consideration will be given to housing development proposals that can demonstrate evaluation against Building for Life 20121 (BfL 12) with all criteria achieving a ‘Green’ score. Developments which include a ‘Red’ or ‘Amber’ score against any criterion must be justified in the Design and Access Statement or other supporting statement.”</p>	Agreed. We will include a new policy on design which incorporates aspects from policies H2, B1 and B4	Change to be made as indicated.

				<p>This paragraph suggests that this consideration would trump any other factors in determining the acceptability of development, which is incorrect. 'Red' scores [referred to in paragraph 3] should be avoided through re-design, thus reference to such scores being "justified" is inappropriate.</p> <p>Could policies B1 and B4 be amalgamated?</p> <p>The explanatory text does not appear to clearly relate to this policy.</p>		
47			Policy B5	<p>This policy does not reflect the full criteria of the NPPF in relation to designated heritage assets, such as that any potential harm caused to heritage assets by proposals should be weighed against the public benefits of the scheme (see paragraphs 195 and 196 of the NPPF). Additionally, the explanation refers to archaeology, but this is not mentioned in the policy text.</p>	<p>Agreed. The policy wording will be changed to address these issues.</p>	<p>Change to be made as indicated.</p>
48			Project 1 – Car Parking: Justification	<p>Build new car parks on unused land – criterion a) would be classified as inappropriate development in the Green Belt and it is unclear how this would be justified.</p>	<p>Noted. The projects are not subject to examination and are community aspirations to be progressed with third parties.</p>	<p>None</p>
49			Project 2 – Road Safety	<p>The proposed measures listed are the responsibility of Warwickshire County Council as County Highways Authority. These aspirations will not happen unless WCC has agreed to the proposals. Additionally, the proposed cameras, flashing signs etc. appear to conflict with Policy B5.</p>	<p>All projects can only be progressed with others. This does not diminish their importance locally.</p>	<p>None</p>
50			Project 4 – The Mount	<p>Paragraph 1 refers to "pathways...turning into an inaccessible wilderness...". Are there public rights of way over/through this site? This should be checked with Warwickshire County Council.</p>	<p>This is a project and not a planning policy</p>	<p>None</p>



51			Project 4 – The Mount: Justification	The first paragraph refers to a 'perimeter pathway'. Is this a public right of way [see comment above]? If so, this should be made clear and perhaps the project would benefit from including a map showing the alignment of the public rights of way across/around the site and also including the plan prepared by the owners in 2014 to illustrate the potential improvements to the site.	This is a project and not a planning policy and is not required to be as descriptive as is being suggested.	None
52		Cllr Matt Jennings	Section 3 – Producing the NDP	There seem to have been no community consultation on this NDP since 2018 – there has been a new JPC since then and a lot has changed in 2 years. I am unsure how up to date this document is or how reflective it is of the views of the community or JPC.	The document will be updated prior to submission and further community consultation to add to the significant amount already undertaken will take place prior to submission.	Change to be made as indicated.
53			Section 10 – Vision Statement: Sustainable residential development	Where are the identified areas to satisfy this - I cannot see any areas or a map to indicate / identify these.	The NDP supports appropriate sustainable residential development but does not allocate specific sites as there is no residual housing requirement in the Parish.	None
54			Section 10 – Vision Statement: Sustainable Economic development	Where are the identified areas to satisfy this - I cannot see any areas or a map to indicate / identify these?	The NDP supports appropriate sustainable economic development but does not allocate specific	None

					employment sites. NDPs are not required to do so.	
55			Policy E2 - New Employment Opportunities	Where? Henley town boundary is ring-fenced in with the greenbelt so there will have to be a conflict – There are no options to satisfy residential or economic development within the boundary. The only logical alternatives are to therefore identify local areas within the green belt which could satisfy this (classify them as ‘special enterprise / local housing zones’ or such like?) or expand the boundary?	General supportive policies are included in the NDP but without a residual housing requirement and with the severe constraints including the Green Belt it is not feasible to allocate residential or commercial development sites.  The NDP will be reviewed when circumstances change in the future to ensure that the NDP shapes future development activities in the Parish.	None

Ray Evans – Parish Clerk – June 2023