

## Beaudesert and Henley-in-Arden Neighbourhood Development Plan

### Submission Neighbourhood Plan Regulation 16 Consultation (Neighbourhood Planning (General) Regulations, 2012)

#### Schedule of Responses

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| BH01         | Natural England | General                          | <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p> |

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| BH02         | Environment Agency | General                       | <p>Thank you for referring the Regulation 16 consultation in respect of the Beaudesert and Henley-in-Arden Neighbourhood Development Plan (NDP), which we received on 12 October 2023.</p> <p>For completeness, we most recently commented on the Regulation 14 consultation in our letter dated 24 August 2020 (reference UT/2007/101490/AP-16/PO1-L01).</p> <p>Further to our review of the Submission Draft Plan version of the NDP, we welcome the inclusion of paragraph 10.6.3 in the Vision Statement which encourages opportunities to reduce existing flood risk, as well as reference to financial contributions in Policy B3 – Water Management.</p> <p>Notwithstanding the above, we reiterate our previous comments.</p> |
| BH03         | National Grid      | General                       | <p>An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.</p> <p>NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>NGET provides information in relation to its assets at the website below.</p> <p><a href="http://www.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p>   |
| BH04         | National Gas       | General                       | <p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.</p>  |

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|              |                  |                               | <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a>  |
| BH05         | Sport England    | Policy C1                     | <p>Sport England notes that the policy relates to playing field sites and sports facilities as such the policy criteria for the loss of such provision should be consistent with NPPF paragraph 99. Sport England therefore considers that the policy should be amended to reflect NPPF paragraph 99 or playing field sites and sports facilities should be removed from the remit of the policy.</p> <p>Sport England supports the policy support for the enhancements and improvements to existing community facilities and the promotion of them being within active travel routes.</p>   |
| BH06         | Coal Authority   | General                       | Having reviewed your document, I confirm that we have no specific comments to make on it.  |
| BH07         | Arqiva           | General                       | We have no assets in the area.   |
| BH08         | Historic England | General                       | <p>Thank you for the invitation to comment on the Submission Neighbourhood Plan.</p> <p>Our previous comments on the earlier regulation 14 consultation remain entirely relevant, that is:</p> <p>“Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>The emphasis on the conservation of local distinctiveness and variations in local character through good design and the protection of landscape character, along with the recognition afforded to historic farmsteads and archaeological remains is commendable.</p> <p>Overall the plan reads as a well-considered document which we consider takes a suitably proportionate approach to the historic environment of the joint Parishes”.</p> |

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|              |                       |                               | <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of a community led plan.</p>  |
| BH09         | Canal and River Trust | General                       | <p>Thank you for consulting the Canal &amp; River Trust on the submission version of the Beaudesert and Henley-in-Arden Neighbourhood Plan.</p> <p>The Trust does not own or operate any waterways within the Plan area and therefore I can advise that we have no comments to make on the Plan.</p>  |
| BH10         | National Highways     | General                       | <p>Thank you for consulting National Highways on the Beaudesert and Henley-in-Arden Neighbourhood Plan.</p> <p>National Highways 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 economic growth.</p> <p>In responding to Local Plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>We note that the SRN in closest proximity to the plan area is the M40 motorway which is approximately 7 miles from Henley-in-Arden and Beaudesert. We have considered the contents of the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no further comments to make.</p> |

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| BH11         | Resident   | Policy H1                     | Object - The Settlement Boundary should include Beaudesert Park as this is clearly a cluster of dwellings (6 apartments and 5 houses) that is served by the full range of services and facilities available and provided in the local service town centre (as opposed to being an isolated location). By definition Beaudesert Park site is therefore not an isolated development and the same parameters afforded to the area defined as the Settlement Boundary should be applied. Case history shows that 'infill' development outside the defined boundary is acceptable where a sites location can be considered within the town's settlement, if assessment 'on the ground' indicates this to be appropriate. Reference - judgment of Lord Justice Sullivan in the case of Wood v SoS and Gravesend Borough Council (2015) ECWA Civ 195 Appeal dated August 2020 Consistent development criteria for this none isolated site would clearly be no more harmful than that applicable to the boundary shown within the Settlement Boundary. |
|              |            | Policy H2                     | Object - The use of the word adjoins is inappropriate and should be given more context by being described as being within the town by assessment 'on the ground' for example, is the area served by the same transport system, the same medical centre, the same schools, the same opticians, the same dentist practice, the same library etc etc  |
|              |            | Policy E1                     | Support  |
|              |            | Policy E2                     | Support  |
|              |            | Policy E3                     | Support  |
|              |            | Policy E4                     | Support  |
|              |            | Policy E5                     | Support  |
|              |            | Policy C1                     | Support  |
| Policy C2    | Support    |                               |  |

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|              |            | Policy C3                     | Support        |
|              |            | Policy N1                     | Support        |
|              |            | Policy N2                     | Support        |
|              |            | Policy N3                     | Support        |
|              |            | Policy B1                     | Support        |
|              |            | Policy B2                     | Support        |
|              |            | Policy B3                     | Support        |
|              |            | Policy B4                     | Support        |
| BH12         | Resident   | Policy H1                     | Support        |
|              |            | Policy H2                     | Support        |
|              |            | Policy E1                     | Support        |
|              |            | Policy E2                     | Support        |
|              |            | Policy E3                     | Support        |
|              |            | Policy E4                     | Support        |
|              |            | Policy E5                     | Support        |
|              |            | Policy C1                     | Support        |

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|              |            | Policy C2                     | Support        |
|              |            | Policy C3                     | Support        |
|              |            | Policy N1                     | Support        |
|              |            | Policy N2                     | Support        |
|              |            | Policy N3                     | Support        |
|              |            | Policy B1                     | Support        |
|              |            | Policy B2                     | Support        |
|              |            | Policy B3                     | Support        |
|              |            | Policy B4                     | Support        |
| BH13         | Resident   | Policy H1                     | Support        |
|              |            | Policy H2                     | Support        |
|              |            | Policy E1                     | Support        |
|              |            | Policy E2                     | Support        |
|              |            | Policy E3                     | Support        |
|              |            | Policy E4                     | Support        |
|              |            | Policy E5                     | Support        |

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|              |            | Policy C1                     | Support   |
|              |            | Policy C2                     | Support   |
|              |            | Policy C3                     | Support   |
|              |            | Policy N1                     | Support   |
|              |            | Policy N2                     | Support   |
|              |            | Policy N3                     | Support   |
|              |            | Policy B1                     | Support   |
|              |            | Policy B2                     | Support   |
|              |            | Policy B3                     | Support   |
|              |            | Policy B4                     | Support   |
| BH14         | Resident   | Policy H1                     | Support - A realistic and manageable aspiration, in keeping with the local character and layout of the town/joint parish. |
|              |            | Policy H2                     | Support - The criteria set out are fair and reasonable.   |
|              |            | Policy E1                     | Support - The criteria set out are fair and reasonable and support the commercial aspirations of the town/joint parish.   |
|              |            | Policy E2                     | Support - The criteria set out are fair and reasonable and highly important to the town/joint parish.                     |



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|              |            | Policy E3                     | Support - The retention and protection of local character, residential amenity and highway safety must be a priority.   |
|              |            | Policy E4                     | Support - Fully agree with the proposals that have been set out.  |
|              |            | Policy E5                     | Support - Fully agree with the proposals that have been set out.  |
|              |            | Policy C1                     | Support - Fully agree with the proposals that have been set out.  |
|              |            | Policy C2                     | Support - The retention and protection of designated local green space is very important to the local community and the character of the town/joint parish.                       |
|              |            | Policy C3                     | Support - The retention and protection of existing and/or, the development of new, community sports and leisure facilities, is key for the local community and town/joint parish. |
|              |            | Policy N1                     | Support - Strongly agree with the points as set out above.  |
|              |            | Policy N2                     | Support - Fully agree with the above.   |
|              |            | Policy N3                     | Support - Fully agree with all of the above.  |
|              |            | Policy B1                     | Support - Agree with all of the above.  |
|              |            | Policy B2                     | Support - Fully support the above.  |
|              |            | Policy B3                     | Support - Fully support all of the above.   |
|              |            | Policy B4                     | Support - Heritage assets are a key feature of the town/joint parish and must be fully protected and retained, wherever possible and/or practicable.                              |

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| BH15         | Resident   | <p data-bbox="680 280 887 911">Policy H1</p> <p data-bbox="680 911 887 1377">Policy H2</p> | <p data-bbox="920 280 2029 911">Object - I find point one contradictory. Supporting new housing development within the settlement boundary, i.e. the area that is shaded is bemusing as Henley In Arden settlement is "full" unless they build on the existing schools, the existing car parks (which is already an issue) or have a request from one property on Redditch Road to be knocked down and houses built upon. I find it difficult to support this as it is not a reasonable statement. This is a NDP to cover to 2031 when the settlement is in effect full already. Not a great vision. Regarding point 2, Green Belt, to resist in favour of point 1 develop within existing settlement is as per my concerns above - the existing settlement is already full so where else can Henley expand other than green belt. My view on Green Belt development should be one that is allowed only for small scale, sympathetic designs and only in-fill in the surrounding hamlets and small villages - there are many that surround Henley. To develop a new large scale housing development (200+) on green belt land should be resisted and this includes for example the disused golf course close to the settlement boundary that the parish council have already been in discussion with. This is green belt land that was originally farmland and can easily be converted back to farmland. I am in favour of green belt development but I believe over the next 7 years that should be achieved by infilling hamlets and surrounding villages with extra homes on a smaller scale.</p> <p data-bbox="920 911 2029 1377">Object - I refer to my comments made on Policy H1 to be included. Rural Exception sites should mainly be focused on expanding the local hamlets and villages that surround Henley in Arden and not focused on expanding the Henley Settlement Area because a parcel of land adjoins the settlement boundary. I believe all additional housing - affordable through to 2031 can be achieved via land infill in hamlets and rural green belt areas to improve community life there. What is deemed affordable homes is very questionable in rural areas even for local people who wish to remain where they were brought up. I would not want the immediate green belt land adjoining the settlement boundary to be built upon during this period up to 2031. Other rural green belt options are available on a smaller scale. My concern with Policy H1, H2 and H3 is that it targets the immediate green belt farmland that was once used by an unsuccessful golf course. This land can be returned to farmland and to justify otherwise would be very concerning.</p> |

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|              |            | <p>Policy E1</p> <p>Policy E2</p> <p>Policy E3</p> <p>Policy E4</p> <p>Policy E5</p> | <p>Support</p> <p>Object - I do not see how proposals for new employment sites can be applied in Henley in Arden as the only sites exists outside of the settlement and therefore green belt which would erode green belt. There are far better sites in towns closer to Henley to build and attract employers and many of these employment sites have better transportation links so by building new employment sites would mean more vehicles. To build a technology park or other on the boundary of Henley I question how many businesses would employ many locals given the current demographic.</p> <p>Support - I support the improvements to existing leisure and tourism facilities but would also support the building of a sporting leisure facility on green belt that is on the the boundary of the settlement area. These type of facilities would more likely employ local people than technology parks or business parks.</p> <p>Support - Fibre Optic connections should be a given but realistically it is driven by the technology available at the time by the core infrastructure provider. Improvement in telecommunications for cellular communications is a major requirement in Henley. Cannot believe that over 23+ years of modern day cellular communications in England and we still have poor reception areas. Sad to say it is driven by cost and the return on investment for such a small community. Tesla Mobile Satellites will become the norm!</p> <p>Support - I do not see why this should be a policy. People worked from home long before the Pandemic. if people want to build outside buildings or offices on their land then it should comply with current planning legislation and not intrusive to their neighbours. That is just good planning reviews and decisions. I do not see why this should be a policy. Feels a bit knee jerk to me. Businesses should encourage people to work at the business location for good of mental health and feeling part of a working community. If the business world encourages Policy E5, which i read in the FT more are demanding people return, then I do not see the reason for Policy E2 as there will be no requirement.</p> |

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|              |            | Policy C1                     | I support the protection of the existing community assets but more importantly enhancing them. My concern is that all these existing community assets require significant financial support to keep them up to date and viable. Having lived in the area for over 40+ years the sports recreational field where bowls, tennis, football and scout hut exist is a prime site that should be collectively reviewed to develop into a sporting facility including a gym, sports hall , swimming etc. The space is there but without local funds i cannot see it being developed into what it could be for another 40 Years!  |
|              |            | Policy C2                     | Support   |
|              |            | Policy C3                     | Support   |
|              |            | Policy N1                     | Object - No Solar Farms. Currently National Grid's cost to connect to the 400kV National Grid line from Berkswell to Feckenham which runs in parallel to Henley making it unviable at this current time...circa. £10-12m to connect plus the 400kV line is notoriously unstable   |
|              |            | Policy N2                     | Support   |
|              |            | Policy N3                     | Support - Many of the areas where the views overlook are towards land that is a flood plain. No land should be developed where it is a natural flood plain for the River Alne. By all means plant Trees and vegetation but no building development.   |
|              |            | Policy B1                     | Object - Generally, I support this policy and these are points that are have previously been commonplace in planning but very rarely adhered to. For this I object but in particular to points A, I and J. Design quality to be in keeping with the character and style of buildings, building styles, lines etc. Yet none of this has been adhered to in the past where i cite the development on the old market, the recent development on the goldsmiths site and one of the earlier developments mid town which effectively put modern red brick houses that have no keeping in the character of the surrounding. I find this one difficult to support as it does not give me confidence it will be adhered to. Only smaller traditional style builders would have a chance of meeting this criteria but at a cost that probably is not affordable. |

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|              |            | Policy B2                     | Support - Support Re-use of rural buildings and non agricultural land in rural areas   |
|              |            | Policy B3                     | Support - I add that no development should be achieved on flood plain land - ever.   |
|              |            | Policy B4                     | Support  |
| BH16         | Resident   | Policy H1                     | Neither support nor object. Disagree with statement: 'New housing development within the Settlement Boundary will be supported in principle'. Applications should be considered on a case by case basis.   |
|              |            | Policy H2                     | Neither support not object. But this is contradictory to H1. Needs more detail on the percentage of 'market housing' permissible. This should be as limited as possible.   |
|              |            | Policy E1                     | Neither support nor object. Disagree with: 'Extensions to existing commercial buildings in the Neighbourhood Area will be supported providing there is no conflict with other policies in this Plan.' Think this should be considered on a case by case basis. |
|              |            | Policy E2                     | Support - However, this should depend on where they will be located.   |
|              |            | Policy E3                     | Neither support nor object. Think this should be considered on a case by case basis. For example, it depends on location.  |
|              |            | Policy E4                     | Support  |
|              |            | Policy E5                     | Support  |
|              |            | Policy C1                     | Support, but why focus just on 10-16 year groups in final para, what about all people under 18 and all people over 65?   |
|              |            | Policy C2                     | Support, however have concerns about what 'enhancement of the special qualities' will permit. For example, not convinced of need for new car park close to the Mount.  |

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|              |            | Policy C3                     | Support   |
|              |            | Policy N1                     | Support   |
|              |            | Policy N2                     | Support, but why limited just to trees and hedgerows, important though they are.  |
|              |            | Policy N3                     | Support, however interested in how plans for a car park near the Mount will impact on this policy. N3 policy should take pre-eminence.  |
|              |            | Policy B1                     | Support - Welcome the insertion of the Conservation Area in this document. I think there should also be a policy to: 'avoid the conversion of residential dwellings in the Conservation Area into business premises where this would cause significant harm to residential amenity.'                                  |
|              |            | Policy B2                     | Support   |
|              |            | Policy B3                     | Support - Think urgent action is needed on flood prevention in Henley. There should be no building on or near flood plains, as this will only exacerbate flooding risk. Existing drainage issues should be speedily resolved.   |
|              |            | Policy B4                     | Support - Think there should be a more specific and explicit policy on protecting the Conservation Area as well as other designated Heritage Assets. Also, no space for extra comments, but agree this plan should be reviewed in 2026. Concerned what plans for the 'refurbishment' of the Mount would mean as well. |
| BH17         | SDC        | General                       | The NPPF was updated in September 2023 so this version should be referred to throughout the document.   |
| BH17         | SDC        | General                       | The District Council should be referred to as "Stratford-on-Avon District Council" throughout (not "Stratford-upon-Avon")   |

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|                     |  |                                   | The Core Strategy should be referred to as the “Stratford-on-Avon District Core Strategy” instead of the “Stratford-upon-Avon Core Strategy”.  |
| BH17                | Stratford-on-Avon District Council (SDC) | Maps                              | 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.   |
| BH17                | SDC                                      | Page 7 – Producing the NDP        | This section does not make any reference to the initial Regulation 14 consultation in 2019, or the Regulation 14 re-consultation on the NDP that took place in July and August 2020. Considering that this consultation is a statutory part of the NDP process, it is surprising that these consultations have not been referenced here.   |
| BH17                | SDC                                      | Page 12 – Vision Statement        | <p>Paragraph 10.6.3 – it is unclear why this paragraph is in the Economy section as it is about flood risk.</p> <p>Paragraph 10.7.2 – not all of these matters are in the capacity of the NDP to control and/or would require agreement with other authorities.</p> <p>Paragraph 10.8.1 – ‘Biodiversity and Ecology’ needs to be removed from the beginning of the paragraph.</p>  |
| BH17                | SDC                                      | Page 14 - Policy                  | <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. 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> |
| BH17                | SDC                                      | Page 14 – P1 Housing              | The first paragraph under ‘P1 Housing – Strategic Objective’ – sentence “All such homes have now been built and received planning consent in line with the following policies:” this doesn’t make sense in light of the subsequent paragraphs.   |

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| BH17                | SDC               | Page 14 – paragraph 11.2          | The sentence “Residents are keen to preserve the railway line as the natural boundary...” A small section of the BUAB includes a parcel of land to the west of the railway line. Is there a conflict here?   |
| BH17                | SDC               | Page 14 – Policy H1               | <p>The basis on which the Built-up Area Boundary [BUAB] has been defined requires clarification. It is understood that the BUAB is based on the BUAB from the 2022 SDC draft Site Allocations Plan (SAP) but this should be confirmed within the Explanatory Text to the Policy.</p> <p>Paragraph 1 of the Policy refers to Figure 2 on page 16 – this Figure is on Page 15.</p> <p>Paragraph 2 of the Policy in relation to appropriate development in the Green Belt should be brought in line with wording in the 2023 NPPF and Core Strategy.</p>  |
| BH17                | SDC               | Page 14 – Policy H1 Explanation   | <p>The final sentence of the Explanation states “It has been confirmed with SDC that Henley has exceeded its housing requirement with recent development and no further residential development is required by SDC within the Neighbourhood Area”</p> <p>In this respect, the Core Strategy indicates an approximate amount of homes to be provided over the Plan period, however this is not a limit on house numbers that cannot be exceeded. Paragraph 6.4.16 of the Core Strategy under Policy AS.4 clarifies: “Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about 90 homes are to be provided in the town over the plan period. Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.”</p> |
| BH17                | SDC               | Page 15, paragraph 11.6           | The last part of this paragraph contradicts Policy H2: “In particular, social and affordable housing should be located within the Settlement Boundary as infill sites so as to ensure that they are properly integrated into the community...” as Policy H2 allows for local need housing adjacent to the settlement boundary.   |



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| BH17         | SDC        | Page 15,<br>paragraph 11.8               | 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/H2.   |
| BH17         | SDC        | Page 15,<br>paragraphs 11.9<br>and 11.10 | There appear to be typographical errors in paragraphs 11.9 and 11.10.  |
| BH17         | SDC        | Page 15 - Policy<br>H2                   | <p>The most recent local housing needs survey covering the Neighbourhood Area was commissioned by the Joint Parish Council and undertaken by the Rural Housing Enabler. Its findings are detailed in a report dated January 2020 and have been adopted by the Joint Parish Council. Briefly, the survey identified unmet local housing needs amongst a total of 19 households, although reference was also made to the considerable number of households locally on the District Council's housing waiting list. Since the adoption of the above survey no tenable scheme or schemes to address the identified need have been proposed or completed.</p> <p>The inclusion of Policy H2 is, in principle, welcome. It overcomes the previous concern about the lack of such a policy, and it is considered the Plan better reflects the strategic approach of the Core Strategy regarding the distribution of development and the status of Henley-in-Arden as a Main Rural Centre.</p> <p>It is still considered that it would have been preferable for the Plan to have allocated one or more sites for a 'Local Need' housing scheme. However, the latest iteration of the Plan does at least introduce a criteria-based policy against which proposals for community-led schemes can be considered.</p> <p>There are two main issues to raise at this stage:</p> <ol style="list-style-type: none"> <li>(1) Significant concerns and objections about its detailed wording and likely operational effectiveness but consider those issues could be resolved through changes to the wording.</li> <li>(2) The supporting text to Policy H2 is inappropriately worded, especially in respect of the local occupancy controls that would apply but, again, consider this matter could be easily resolved.</li> </ol> |

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|              |            |                               | <p><b><u>Policy H2</u></b></p> <p>In terms of the Policy wording, there are some specific concerns and objections:</p> <p>(1) The title could usefully be changed to ‘Community-led Housing Schemes’ to better reflect the strategic context.</p> <p>(2) There appears to be a lack of direct alignment with the strategic approach set out in Core Strategy Policy CS.15, which provides for a wider role for community-led schemes than that suggested by Policy H2.</p> <p>(3) The reference in criterion (d) to ‘an element of market housing’ (implying open market housing) is both confusing and un-necessary and would benefit from modification: preferably to include reference to the scope for ‘local market’ housing, given that a modest need for such is identified in the 2020 survey.</p> <p>(4) The final sentence ‘First Homes and Self-build proposals will be welcomed’ appears to conflate different housing delivery policy platforms and it is considered these matters would be better addressed in a separate Policy.</p> <p><b><u>Explanatory Text</u></b></p> <p>In terms of the explanatory text, those parts of the explanatory text accompanying Policy H2 concerning local connection criteria are misleading, but in any case, this part of the Plan could be better worded.</p> <p>Additionally, Part S of this Authority’s Development Requirements Supplementary Planning Document (“the SPD”) was adopted in April 2019. Yet it is unclear as to what regard has been had to the detail in this document in preparing the Plan. The following Sections are particularly relevant:</p> <ul style="list-style-type: none"> <li>• S2 – Local Needs Housing Schemes</li> <li>• S3 – General Needs Housing Mix and Type</li> <li>• S4 – Affordable Housing Tenure</li> <li>• S5 – Management of Affordable Housing</li> </ul> |

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|              |            |                               | <ul style="list-style-type: none"> <li>• S6 – Integrating Affordable and Market Housing.</li> </ul> <p>For reasons of practicality, it may be useful for the Plan to simply confirm that the local community are content with the guidance set out in the above parts of the SPD if this is indeed the case.</p> <p>Of greatest concern are the final two paragraphs of the explanatory text on page 15. The following statement is misleading:</p> <p>“The SDC Priority Nominations arrangements outlined in the Development Requirements SPD allows for circumstances where people from across the District could be nominated to the tenancies of new affordable homes in the Parish in preference to people with a local connection”</p> <p>Whilst it would be possible for the Plan to set out alternative arrangements – if that is indeed the wish of the local community – the reference to Priority Nominations arrangements is, in fact, only one aspect of a broader set of arrangements concerning local occupancy requirements for both affordable and ‘local market’ housing. The reference has therefore been taken out of context. The statement in the fifth and final paragraph that “The Policy seeks to address this issue.” is therefore unclear. For example, criterion c) does not modify those arrangements, although it (or Policy H2 more generally) could do so.</p> <p>Given the above issue and the fact that the Plan contains no reference to the findings of the 2020 survey it is considered that this whole section of text would benefit from being redrafted.</p> <ul style="list-style-type: none"> <li>• The opening three paragraphs, whilst factually correct, would benefit from a more local focus – for example, reference to the findings of the 2020 survey.</li> <li>• Unless it is the express wish of the local community to derogate from the detailed occupancy control arrangements set out in Section S5 of the SPD (in which case Policy H2 itself needs to make this explicit) then it would be useful to explain that the detailed arrangements in the SPD would apply. For the avoidance of doubt, taken as a whole, they</li> </ul> |

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|              |            |                               | <p>would prioritise allocation/sale to households with a local connection to the Neighbourhood Area.</p> <p><b><u>Proposed Rewording of Policy and Explanation</u></b><br/>It is recommended to replace Policy H2 (Rural Exception Site) as drafted and accompanying explanatory text as follows:</p> <p><i><u>“H2 Local Needs Housing</u></i><br/><i>To meet identified local needs within the Plan area, the provision of one or more small-scale community-led schemes will be supported where the following criteria are met:</i></p> <ul style="list-style-type: none"> <li><i>(a) The site or sites adjoin the Settlement Boundary; and</i></li> <li><i>(b) The profile of the scheme, in terms of the number, type, size and tenure of the dwellings proposed is justified by evidence from an adopted local housing needs survey; and</i></li> <li><i>(c) A planning obligation will be used to ensure that all housing is available in perpetuity for people with a qualifying local connection to the Plan area.”</i></li> </ul> <p><i><u>Explanation</u></i><br/><i>In addition to the housing growth provided for by Policy H1, it is also important this Plan should make provision for community-led schemes to meet purely local housing needs.</i></p> <p><i>The Core Strategy provides scope for the development of ‘local needs’ schemes: small-scale community-led schemes brought forward to meet a need identified by local communities. The Joint Parish Council (JPC) note the development of many such schemes elsewhere within Stratford-on-Avon District in recent years, including schemes located within the Green Belt. They are keen to promote the development of a similar scheme or schemes within the Plan area.</i></p> <p><i>The relevant strategic policy framework is provided by Part G of Core Strategy Policy CS.15. Policies AS.10 and CS.10 further provide scope for such schemes to be located within the Green Belt.</i></p> |

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|              |            |                               | <p><i>The most recent evidence of an unmet local housing need is contained in a report prepared by the Rural Housing Enabler and adopted by the JPC in 2020. Briefly, that report identified an unmet housing need amongst a total of 19 households, for a mixture of both affordable and local market housing. However, the JPC will also consider commissioning future similar surveys from time-to-time to ensure that schemes are designed based on the most relevant and up-to-date information.</i></p> <p><i>A key issue is to ensure that all the housing developed in this way – whether affordable or market – is prioritised for occupation by households with a suitable qualifying local connection to Beaudesert and Henley-in-Arden parishes. This applies both on first letting or sale and all subsequent lettings/re-sales in perpetuity. Such occupancy controls will be given effect via a planning obligation. The detail of such arrangements should follow the principles set out in Part S of the District Council’s Development Requirements Supplementary Planning Document or any successor document.”</i></p> <p>NB: To correct an error in the explanation of the way nomination arrangements to affordable homes work, a cross-reference to the District Council’s Development Requirements SPD on this matter has been incorporated. This is on the assumption that the JPC are content to adopt those arrangements for the purpose of applying Policy H2, rather than applying any alternative bespoke arrangements. It is emphasised that the current ‘standard’ arrangements have been successfully developed and refined over many years and – in particular – will ensure that the letting or sale of properties will be prioritised to people with a qualifying local connection to the parishes of Beaudesert and Henley-in-Arden.</p> |
| BH17         | SDC        | Page 16 – Policy E1           | <p>The policy requires all the criteria to be met. This is not appropriate as the criteria cover some quite different circumstances. For example, you wouldn’t expect d) to always be the case.</p> <p>The policy explanation would benefit in outlining the types of uses (workshop/offices as mentioned in Policy E2) or the use classes (Class E/ Class B2/B8/Sui Generis/Class E(i,ii,iii)) Policy E1 applies to.</p>  |

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| BH17                | SDC               | Page 16 - Policy E2                   | <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 2023].</p> <p>The Explanation does not explain where this conclusion is taken from e.g. 2015 Residents Survey, a consultation event, etc.?</p>  |
| BH17                | SDC               | Page 17 - Policy E4                   | <p>Suggest tightening “all new residential and commercial developments” to exclude e.g. householder developments, or extensions to existing commercial sites.</p> <p>This policy may not be enforceable/relevant to certain types of telecommunications equipment if it is Permitted Development.</p>  |
| BH17                | SDC               | Page 18 – Policy E5                   | Suggested to include criteria “It would comply with Green Belt policy”   |
| BH17                | SDC               | Page 19 - Policy C1                   | <p>The reference in this policy should presumably also be to Appendix 1?</p> <p>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 Core Strategy 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>The final paragraph of the Explanation could be clarified as it seems to refer to some unrelated issues e.g. electric charging points in new homes.</p> |
| BH17                | SDC               | Page 20 – Policy C2                   | <p>The reference in this policy should be to Appendix 2.</p> <p>LGS 1 appears to be designating the Scheduled Ancient Monument. It already has significant protection from development (see NPPF paragraph 200), so it is unclear what the purpose of designation as an LGS would be.</p>  |
| BH17                | SDC               | Page 21 - Policy C3                   | The reference in this policy should be to Appendix 3   |

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| BH17         | SDC        | Page 22 - Policy N2           | <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><i>"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. 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.</i></p> <p><i>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".</i></p> |
| BH17         | SDC        | Page 23 - Policy N3           | <p>The reference in this policy should be to Appendix 4.</p> <p>The view descriptions have been lifted from the photograph descriptions in Appendix 4 – and include elements such as "during dry period in summer" that should be deleted from the policy. This has also resulted in numbering where 2 and 3 refer to the same view. Views 2 and 3 should be combined into a single view, and views renumbered 1-5.</p> <p>Figure 4 is lacking a caption.</p>   |
| BH17         | SDC        | Page 24 - Policy B1           | <p>The relationship to Core Strategy Policy CS.9 is unclear, and should be explained.</p> <p>g) should be 'Part O' of the SPD, not Part 0</p>   |

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|              |            |                                   | <p>i) – This criterion feels unnecessarily restrictive of innovative architecture. Criterion a)'s requirement to be “compatible” with the character of the area seems to adequately cover this point without the further restriction in criterion i)</p> <p>k) – Typo in the reference to “Building for Life 12”.</p> <p>It is not considered that all the bullet points would fit under the policy heading of ‘design quality’. 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> |
| BH17         | SDC        | Page 25 - 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 that this Policy should make reference to Core Strategy Policy AS.10.</p>  |
| BH17         | SDC        | Page 26 - Policy B3               | <p>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”.</p> <p>There is a typographical error in the Explanation to this Policy in the sentence “Developments 2 Requirements...”</p>  |
| BH17         | SDC        | Page 27 - Policy B4 - explanation | <p>Policy B4 Explanation makes reference to Figure 5, which doesn’t appear in the document.</p>   |
| BH17         | SDC        | Project 1 – Car Parking           | <p>This project should have as its first and fundamental step, an aim to reduce demand for car parking, by finding ways to encourage walking and cycling.</p>   |
| BH17         | SDC        | 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.</p>   |



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| BH17                | SDC               | Appendix 3                            | The reference in the 2 <sup>nd</sup> sentence should be to Appendix 1. |