



Beaudesert and Henley-in-Arden Neighbourhood Development Plan

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

Comments from External Parties

Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
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</p>	Noted. No comment to make.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<p>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>	
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</p>	Noted. Support for the vision statement is welcomed.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<p>financial contributions in Policy B3 – Water Management.</p> <p>Notwithstanding the above, we reiterate our previous comments. If you have any queries contact me on the details below.</p>	
BH03	National Grid	General	<p>An assessment has been conducted 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>www.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p>	Noted. No comment to make.
BH04	National Gas	General	<p>An assessment has been conducted 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>	Noted. No comment to make.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			https://www.nationalgas.com/land-and-assets/network-route-maps	
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>	<p>It is Policy C3 not Policy C1 that relates to playing field sites and sports facilities.</p> <p>The relevant NPPF reference is paragraph 103 (NPPF, December 2023).</p> <p>NDP Policy C3 is consistent with the NPPF paragraph 103.</p> <p>No changes are deemed necessary.</p>
BH06	Coal Authority	General	Having reviewed your document, I confirm that we have no specific comments to make on it.	Noted. No comment to make.
BH07	Arqiva	General	We have no assets in the area.	Noted. No comment to make.
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>	Noted. Support for the approach within the NDP to the historic environment is welcomed.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<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> <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 & 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>	Noted. No comment to make.
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</p>	Noted. No comment to make.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<p>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>	
BH11	Resident	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	Beaudesert Park is considered to be too far from the built-up area to justify being a sustainable location in its own right.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		H2 E1 E2 E3 E4 E5 C1 C2 C3	<p>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</p> <p>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.</p> <p>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.</p> <p>Support</p> <p>Support</p>	<p>The word 'adjoins' is used in national planning policy and is considered to be appropriate.</p>



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		N1	Support	
		N2	Support	
		N3	Support	
		B1	Support	
		B2	Support	
		B3	Support	
		B4	Support	
			Support	
			Support	
			Support	
			Support	
			Support	
			Support	
BH12	Resident	H1	Support	
		H2	Support	
		E1	Support	
		E2	Support	



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		E3	Support	
		E4	Support	
		E5	Support	
		C1	Support	
		C2	Support	
		C3	Support	
		N1	Support	
		N2	Support	
		N3	Support	
		B1	Support	
		B2	Support	
		B3	Support	
		B4	Support	
BH13	Resident	H1	Support	
		H2	Support	
		E1	Support	



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		E2	Support	
		E3	Support	
		E4	Support	
		E5	Support	
		C1	Support	
		C2	Support	
		C3	Support	
		N1	Support	
		N2	Support	
		N3	Support	
		B1	Support	
		B2	Support	
		B3	Support	
		B4	Support	
BH14	Resident	H1	Support - A realistic and manageable aspiration, in keeping with the local character and layout of the town/joint parish.	Noted
		H2		Noted



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		E1	Support - The criteria set out are fair and reasonable.	Noted
		E2	Support - The criteria set out are fair and reasonable and support the commercial aspirations of the town/joint parish.	Noted
		E3	Support - The criteria set out are fair and reasonable and highly important to the town/joint parish.	Noted
		E4	Support - The retention and protection of local character, residential amenity and highway safety must be a priority.	Noted
		E5	Support - Fully agree with the proposals that have been set out.	Noted
		C1	Support - Fully agree with the proposals that have been set out.	Noted
		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.	Noted
		C3	Support - The retention and protection of existing and/or, the development of new, community	Noted



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		N1 N2 N3 B1 B2 B3 B4	<p>sports and leisure facilities, is key for the local community and town/joint parish.</p> <p>Support - Strongly agree with the points as set out above.</p> <p>Support - Fully agree with the above.</p> <p>Support - Fully agree with all of the above.</p> <p>Support - Agree with all of the above.</p> <p>Support - Fully support the above.</p> <p>Support - Fully support all of the above.</p> <p>Support - Heritage assets are a key feature of the town/joint parish and must be fully protected and retained, wherever possible and/or practicable.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
BH15	Resident	H1	<p>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</p>	<p>It is necessary to distinguish between the built-up area within the settlement boundary and the countryside outside of it. It is appropriate for development in principle to be supported in the most sustainable locations, but any development proposal will need to demonstrate compliance with other policies as appropriate.</p>



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		H2	<p>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 large new 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>It is not possible for the NDP to override strategic policy relating to development of the green belt.</p> <p>The NDP supports the protection of the green belt.</p> <p>The policy on rural exception sites merely adds local detail and additional protections to strategic policies in the Core Strategy and NPPF which allow for such development in specific circumstances.</p> <p>The policy does not make the possibility of a rural exception site coming forward more or less likely, it adds in local protection against that development being made available for people outside of Henley.</p>
		E1	Object - I refer to my comments made on Policy H1 to be included. Rural Exception sites should	
		E2	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	
		E3	is deemed affordable homes is very questionable	



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response	
		E4	<p>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>	<p>Noted</p> <p>The policy sets conditions that would need to be applied for development proposals to be supported, and therefore helps to protect the community from adverse impacts of development.</p> <p>Noted.</p>	
		E5	<p>Support</p>		
		C1	<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>		
		C2	<p>Support - I support the improvements to existing leisure and tourism facilities but would also support the building of a sporting leisure facility</p>		
		C3			



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		N1 N2 N3 B1 B2 B3 B4	<p>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</p>	<p>Noted.</p> <p>The policy sets conditions against which any planning application will be assessed, and therefore supports home working but ensures that and adverse impacts are mitigated.</p>



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<p>people return, then I do not see the reason for Policy E2 as there will be no requirement.</p> <p>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!</p> <p>Support</p> <p>Support</p> <p>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</p> <p>Support</p> <p>Support - Many of the areas where the views overlook are towards land that is a flood plain. No</p>	<p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>The policy does not identify specific sites but sets the conditions that are to be included for any proposal to be supported. As such, it adds restrictions to existing strategic policies.</p> <p>Noted</p> <p>Noted</p>



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			<p>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.</p> <p>Object - Generally, I support this policy, and these are points that 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.</p> <p>Support - Support Re-use of rural buildings and non agricultural land in rural areas</p> <p>Support - I add that no development should be achieved on flood plain land - ever.</p> <p>Support</p>	<p>It seems that the person submitting the comment agrees with the policy but is concerned that it might be ignored when planning decisions are taken.</p> <p>This is the first time locally that such a policy has been given the weight associated with neighbourhood plans and we are confident that it will be given significant weight as is required when planning determinations are made.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
BH16	Resident	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.	Noted.
		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.	Affordable housing is treated differently to market housing. The two policies are not contradictory but rather complementary in approach.
		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.	Noted.
		E2	Support - However, this should depend on where they will be located.	Noted
		E3	Neither support nor object. Think this should be considered on a case by case basis. For example, it depends on location.	Noted
		E4	Support	Noted
		E5	Support	Noted
		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?	Noted
		C2	Support, but why focus just on 10-16 year groups in final para, what about all people under 18 and all people over 65?	It is considered that the 10-16 year age group is under-provided for locally.



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
		C3	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.	The special qualities are those identified for each LGS as described in Appendix 2
		N1	Support	Noted
		N2	Support	Noted
		N3	Support, but why limited just to trees and hedgerows, important though they are.	This policy specifically targets trees and hedgerows and is in addition to the other environmental protections included in the NDP.
		B1	Support, however interested in how plans for a car park near the Mount will impact on this policy. N3 policy should take pre-eminence.	Noted
		B2	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.'	Noted
		B3		
		B4	Support	Noted
			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.	Noted



Response No.	Respondent	Page number/ Policy/ Topic	Representation	Qualifying Body response
			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.	The Conservation Area is appropriately protected by national policy. The NDP cannot add to this level of protection.