



**BEAUDESERT AND HENLEY IN ARDEN  
JOINT PARISH COUNCIL**

**NPPF CONSULTATION AUGUST/SEPTEMBER 2024**

**DRAFT RESPONSE**

| ISSUE      | RESPONSE   | KEY CHAPTER NUMBERS |
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| 1.OVERVIEW | We had a neighbourhood plan approved by Stratford upon Avon DC in May 2024. In that document over 90% of residents made it clear that they would accept new developments if they were proportionate to the existing settlement and made sustainable through infrastructure improvements. Most of the comments on the consultation document are linked in one way or another to these two principles. | 1.INTRODUCTION      |
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| 2.LOCALISM  | <p>We strongly support the emphasis on localism and strategy. It is essential that government empowers local areas to think strategically, and to consult and involve local communities as much as possible. We are fortunate in the local area that Stratford upon Avon and Warwick councils are well advanced with a Local Plan and have an approved economic strategy for the subregion. At the same time there are a significant number of approved neighbourhood plans in the District and the Joint Parish Council successfully had a neighbourhood plan approved In May this year. It is therefore extremely disappointing that the importance of town and parish councils is not mentioned anywhere in this document. This is not only a procedural mistake. Neighbourhood Plans have a legal status in the planning system. Although there are frequent references to local authorities and other statutory agencies, this gap is concerning. The consultation stresses local determination of a range of issues making this an important omission which must be corrected when the final NPPF is issued.</p> | 3.PLANNING FOR THE HOMES WE NEED |
| 3.RESOURCES | <p>National housing targets are increased in the document in urban areas outside London and in combined authorities in the conurbations outside the capital. There is no in principle reason to oppose this. A question which is raised throughout the document is funding support. The capital has received very high housing funding priority for the last 30 years. The redirection in</p>  | 4.STANDARD METHOD OF ASSESSMENT  |

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|                     | <p>targets raises the question whether resources will also be redirected to the provincial regions to meet the new priorities. There is a strong emphasis within the document on collaborative working. This principle makes great sense. However for adjacent areas not identified as priority, receiving significant uplifts in targets (xx% for South Warwickshire) This presents a major resource challenge. The South Warwickshire area is expected to contribute to provide homes for both the Coventry and the West Midland Combined Authority areas . It must be made clear that wherever a local partnership target is distributed, development across Local Authority districts outside the boundary will receive appropriate public grant support. There is no mention of this intention in the document.</p> |  |
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| <p>4.GREEN BELT</p> | <p>The consultation puts much emphasis on the distinction between brownfield, greyland, low quality and high quality green belt. The definitions of brownfield land and high-quality green belt are clear and well established in legal and policy precedent. Definitions of grey land and of low quality green belt, however, are not clear. As these categories form a fundamental part of the plan and a major resource to increase the output of new housing this definition must be significantly improved. Henley in Arden is washed over by green belt currently. It is therefore particularly vulnerable to large-scale changes of definition of green belt deemed suitable for development. The definition of grey land</p>   | <p>5.BROWNFIELD/GREY BELT AND GREEN BELT</p> |

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|                      | <p>does not apply at all within the boundaries of the town. This is a fundamental issue because the quality of the environment is consistently rated by residents and visitors, as a key quality of the town. In the 2023 town consultation, 98% of respondents mentioned environmental quality as being a fundamental factor in their decision to live in the town. The terminology of what is high quality and lower quality greenbelt is clarified further otherwise the town can anticipate many controversies around planning applications. There is a green belt review at sub-regional level being carried out at this moment so this debate will take place in any case in the local area. However, clarity at national level on such an important issue is essential to prevent “turf wars”.</p> |   |
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| 5.AFFORDABLE HOUSING | <p>The government emphasis on far more affordable housing is fully justified.it is already stressed in current draft South Warwickshire Local Plan . There is a proper emphasis on the need for affordable housing in the Stratford and Warwick areas. This need is for both affordable rent and affordable sale and includes social housing needs locally. The section on affordable housing is particularly disappointing because of the flawed economic analysis. It assumes that in high value areas, such as the joint parish there will be landowners and developers willing to develop green belt sites released for housing with a designation</p>  | <p>5.BROWNFIELD/GREY BELT AND GREEN BELT<br/>6.DELIVERING AFFORDABLE WELL DESIGNED HOMES AND PLACES</p> |

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|                    | <p>of 50% affordable., The land value in Henley in Arden for open market private housing is X million per hectare. There is no way in which local landowners will release land for development if they are required to provide 50% affordable housing on their site without additional financial assistance. There needs to be grant assistance at different levels for affordable rent, social rent and shared ownership to deliver housing growth. Land will either be kept off the housing market and/or developers will battle with local authorities continuously about viability. The consultation indicates that viabilities will only be allowed in exception. This is an unrealistic assumption which will be undermined by future events. Recent history demonstrates that developers will try to reduce the amount of affordable housing to the minimum on any site. Local authorities and local communities do not have the finance or expertise to fight well-funded private landowners and developers. In the past the town has seen original targets of 30% affordable homes bartered down to 5% or even zero in the viability process. It is not at all clear how this situation is to be avoided in the future.</p> |   |
| 6.DESIGN STANDARDS | <p>We strongly support the principle of local design codes determined at local level. The government funding for this is vital and a small overall increase in funding would help numerous communities develop good quality design codes</p>   | <p>6.DELIVERING AFFORDABLE WELL DESIGNED HOMES AND PLACES</p> |
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| 7.INFRASTRUCTURE | <p>The economic weakness of the consultation document is further demonstrated by the approach to infrastructure funding. Large-scale infrastructure funding is understandably targeted on economic and commercial sites and initiatives. However many areas which have received relatively little development in the past are targeted in the new Local Plans. Where there is an accelerated release of green belt land many of these areas are likely to have infrastructure that is outdated underfunded and in significant need of improvement. Henley is a town which suffer particularly. This point has been raised in every planning consultation to date and the town has had formal reassurances from Stratford-upon-Avon District Council that any significant growth will be matched by infrastructure improvements. The consultation paper states that housing development in the greenbelt will be matched by funding for infrastructure improvements sourced by developer contributions. This is Alice in Wonderland economics. Developers contributions are restricted to issues within the site boundaries. Where there is improvement required in roads, railways, sewage and water provision as well as basic community services, such as education and health this funding source will be totally inadequate. We are fully aware that public funds are very stretched is essential that any development targets are matched by economic and infrastructure strategies at the same level and not as an</p> | <p>6.DELIVERING AFFORDABLE WELL DESIGNED HOMES AND PLACES</p> <p>7.BUILDING INFRASTRUCTURE TO GROW THE ECONOMY</p> <p>8.DELIVERING COMMUNITY NEEDS</p> |

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|                | <p>afterthought. There is a need for all the elements of infrastructure to be brought together in an additional chapter to the final NPPF document. The clear danger is that without much greater emphasis on funding for infrastructure improvements housing provision will be neither sustainable nor appropriate.</p>  |   |
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| 8.GREEN ISSUES | <p>There is an emphasis within the document on major infrastructure projects in order to combat climate change. The town fully supports these initiatives and believes that an accelerated programme of large-scale development is necessary and would look favourably on ones within its boundary. However, it is very disappointing that the contribution that can be made to climate change strategies by changes in rules for new and renovated housing are not given consideration. This needs to be rectified in the final document. Methods of tackling climate change through new and improved housing needs to be given significant emphasis in the final document</p> | <p>7.BUILDING INFRASTRUCTURE TO GROW THE ECONOMY</p> <p>8.DELIVERING COMMUNITY NEEDS</p> <p>DELIVERING GREEN ENERGY AND ENVIRONMENT</p> |
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| 9.FLOODING AND WATER SUPPLY | There are urgent concerns about the quality of water infrastructure in the town. There was a major flood 17 years ago but two serious flooding incidents in the last two years. Local authorities have worked to ameliorate this situation but the age and capacity of the clean and foul water system struggles to deal with existing volumes. Significant additional development will lead to unacceptable pressures. Policy B3 in the approved neighbourhood plan requires additional investment to these services provided linked to new developments of any scale. | DELIVERING GREEN ENERGY AND ENVIRONMENT       |
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| 10.COMMERCIAL LAND          | it is important that issues around the economy local infrastructure and services are given significant weight alongside housing proposals. There is no reason where there is low grade vacant land it can be released for commercial uses which complement the other strategies for the area. The Local Plan and Economic strategy are clearly the right place for these policies to be embedded.   | 7.BUILDING INFRASTRUCTURE TO GROW THE ECONOMY |
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| 11.AGRICULTURAL LAND        | Policies towards quality agricultural land are only given minimal attention in the document and articulated more clearly  | DELIVERING GREEN ENERGY AND ENVIRONMENT       |
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