**1. USING THE GREEN BELT INCORRECTLY TO RESOLVE STRUCTURAL PLANNING PROBLEMS:**

The proposed development in Henley-in-Arden uses development in the Green Belt incorrectly to resolve structural planning problems in the district. Henley lies between two much larger urban developments in a section of Green Belt land which serves to prevent urban sprawl extending such that the developed envelopes extend to such an extent that they join. To the south, there is extensive white space on the outskirts of Stratford upon Avon, for example, which is ideally suited to development that meets the needs of a modern economy that is responsive to the environmental demands and the new working patterns that have emerged as imperatives in recent years. Development of brownfield sites around existing urban envelopes is consistent with modern planning policy that co-locates living, working and leisure spaces, and preserves the integrity of the nearby Green Belt and all of its benefits.

Stratford District Council itself highlights the evidence that supports this argument:

“Unemployment across the District is low, with 0.3% of workers claiming jobseekers allowance in May 2016. This is lower than the UK average (1.8%) and West Midlands average (2.2%). **There is an imbalance between the number of jobs in the District and its working population. An increasing number of residents commute to higher paid employment outside the District***,* while lower paid jobs are often filled by people coming into the District from adjoining areas. These commuting patterns impose significant pressures on the road network. Employers in and around Stratford-upon-Avon can struggle to recruit staff into lower paid and part time roles and cite the absence of affordable commuting options, particularly outside of peak travel times, as a barrier to filling vacancies.”

**2. ERODES THE COMMITMENT TO THE PRESERVATION OF THE GREEN BELT**

The West Midlands Green Belt wraps around Birmingham, the Black Country and Coventry and extends to a ring of towns beyond the conurbation. Within Stratford-on-Avon District it stretches from the northern edge of Stratford-upon-Avon, along the A46 westwards and the A439 eastwards up to the District boundary with Redditch (apart from small areas of land to the west of Mappleborough Green), Bromsgrove, Solihull and Warwick. The settlements of Alcester, Henley and Studley are excluded from the Green Belt.

Commitments from Stratford and Warwick in the existing planning frameworks reiterate a commitment to the integrity of the Green Belt and the prevailing government guidance and policy in respect of the Green Belt.

It is critical that the Green Belt around Henley is preserved for its environmental benefits and the health and social benefits that it brings to residents. The proposed development is inconsistent with commitments made in the existing planning policies.

**3. SIGNIFCANT INFRASTURCTURE LIMITATIONS AND CONSTRAINTS**

**Traffic Limitations:**

Existing Plans to Match funding has been secured to calm traffic on the High Street in an initiative to impose during the first six months of 2023 a 20 mph speed limit on the High Street and commuter ‘rat run’ cul de sac roads that lead off the main artery. It is counterintuitive to simultaneously restrict the flow of traffic through the town – a demonstrated need in response to recent traffic safety issue – and at the same time expand the volume of traffic resulting from increased housing development around the town.

**Poor Bus Links:**

The bus and train infrastructure is barely sufficient to sustain the existing population, before considering an additional 2,000 residents which might result from the proposed development. The X20 bus service runs 12 buses a day on a weekday and covers the North – South route between Stratford and Solihull. Bus passengers requiring to travel East – West to Redditch and Warwick are required to travel to the end of the north or south routes and then change to another service.

Stratford District Council agree – the 2018 SDC Transport Strategy reports that *“A key barrier to bus use is journey length and issues of punctuality and service reliability which are exacerbated in Stratford-upon-Avon by congestion”*, which is central to the operation of any bus routing to service Henley-in-Arden. Further, SDC reports that *“bus passenger facilities … are currently insufficient for the volume of passengers….”.*

**Impact of Closure of the M40 and other Congestion:**

With the current level of housing, any closure of the M40 south of the M42 junction leads to the diversion of traffic off the motorway and through the town, predominantly using the north-south axis along the High Street. Statistics show that the M40 is the subject of a temporary closure between 3 and 4 times a year. Roadworks anywhere in the town – typically driven by servicing the antiquated drainage system and other infrastructure – currently creates significant delays in the town. Additional development will have an adverse impact on the existing street scape within Henley.

**Inability to Expand or Widen Existing Roads to Accommodate Traffic:**

Henley-in–Arden is a medieval market town with a strong architectural heritage reflected in the North – South road axis and the listed buildings which line the A3400 and High Street. The listed buildings which exist along the main roads in the town preclude any expansion or widening of the road to accommodate increased volumes of traffic arising from increased development and volume of housing.

**Road Safety:**

An increase in development in or around Henley-in-Arden will lead to an increase in traffic of all modes to service population movement around a market town based around two intersecting roads.

A brief review of the traffic accident statistics for Henley in Arden for the last five years shows 25 incidents in the Henley-in-Arden area, one of which is classed as fatal and five of which are classed as serious, all of which centre on the High Street and the crossroads at the South of the town. An increase in population of the scale proposed by the draft Plan would inevitably lead to an increase in road traffic casualties.

**Car Parking:**

Car parking is an acknowledged problem in Henley-in-Arden, where the existing historic housing prevents the development of extensive car parking and on-street parking on the High Street predominates and cars have been forced into small off-street parking facilities – such as that behind the Co-op store. The proposed plan makes no accommodation for the resultant car traffic that would be generated by extensive development around the town.

**Air Quality and the Environment:**

Development of the scale proposed will have a disproportionate and adverse impact on air quality and other factors driven by additional traffic from the aggressive development proposed by the town.

**Propensity to Flooding:**

Henley-in-Arden is famously susceptible to flooding, and certainly more so than other sites and locations proposed in the plan. The SFRA highlights that Henley is one of the most sensitive areas in the Stratford District to the fluvial impacts of climate change. The town rests at the base of a hilly catchment area providing an obvious outlet for when the River Alne floods, as it did most notably in memory in 2007. Additional development would increase the impact of that flooding and place greater demands on the surrounding environment in the event of flooding.

**No Potential to Future Proof the Infrastructure:**

There is no obvious solution to the problem of future-proofing any development proposed in Henley-in-Arden. Ageing water and sewerage infrastructure means that there is little chance of expansion or the development of the infrastructure of the future, particularly electric charging points for cars and the support of renewables.

**4. LOCAL SERVICES ARE INADEQUATE TO SUPPORT PLANNED EXPANSION:**

An increase in the housing stock in Henley-in-Arden such as that proposed in the draft Plan would require additional infrastructure investment, most obviously in **schools and medical facilities**.

Henley in Arden School is part of the Arden Multi-Academy Trust. It has a capacity of 700 pupils and yet already has 710 pupils enrolled. Expansion would inevitably be necessary to sustain development of the extent proposed and local government would need to provide funds.

The existing medical practice moved from the High Street to the existing site in 1990, and access is via a footpath from the High Street or via car through a housing estate to a council run car park. Again, the site of the existing facility and the lack of potential for expansion into surrounding space means that expansion in Henley-in-Arden would require a new medical facility in a new location.

Any expansion of either of these facilities or the commission of new sites would inevitably lead to an increase in the risk of road, pedestrian and traffic incidents as a direct result of the crossroads and road configuration which dominates the town.

**5. ABSENCE OF A FOCUS ON LOCALISM:**

The outline proposals make **no reference to even the sense of the principles of localism** in the Henley-in-Arden community and run contrary to local sentiment. Those responsible for the development of the plan must provide opportunities for communities to influence decision-making. support placemaking and. deliver services that reflect local requirements.

The scale of the development proposed is completely inconsistent with the scale of the existing town and the development of the population to date. Between 1975 and 2015, the population of Henley grew by 14.3%, and grew even more strongly in later years where between 2000 and 2015, it grew by 10.2%. Using data and projections from 1. JRC (European Commission's Joint Research Centre) work on the GHS built-up grid and 2. CIESIN (Center for International Earth Science Information Network), the population in 2022, stood at 2,571. Assuming an average of 3.5 heads occupying a lower estimate of 500 additional houses in Henley-in-Arden as proposed in the Plan, the population of the town would grow by 68%, which is completely disproportionate development.

The plan ignores Stratford Council’s own observations about the importance of Henley’s heritage and the impact of further development upon it. The Heritage and Settlement Sensitivity Assessment for Warwick and Stratford-on-Avon Local Plan of September 2022 observes that “The setting of some of (the) assets, particularly the castle and church, are still currently experienced within the historic open agricultural landscape. It is therefore recommended that development of the land beyond the north-eastern edge of the settlement should be avoided.” There are also similar observations about the land to the south-east and south-west of the town which are completely contrary to the scale of the development proposed in the plan.

Similarly, there is little consideration of the sites north of the Warwick Road (reference HEN.02 in the Stratford Heritage Assessment) where the RED assessment risk of both harm to surviving Ridge and Furrow and harm to archaeological monuments runs contrary to the proposed sites offered for development to the East of the town.

The economy of Stratford upon Avon is delicately dependent on visitors and those in search of rural tourism – the strength of demand is such that the town has its own Heritage Centre for visitors and queues for the locally-made ice cream regularly generate queues that extend up the High Street. Extensive development of the type which is proposed would likely jeopardise local businesses and a tourism-centred town: Solihull was originally a pleasant town in the Green Belt – literally ‘Urbs in Rure’ – but development without reference to local concerns has let it evolve into something much different.

**6.  INFRASTRUCTURE HAS ALREADY BEEN STRETCHED BY UNCONTROLLED DEVELOPMENT TO DATE**

Existing brownfield infill within the town has occurred over previous years without any improvement in the infrastructure within the local area. Stratford District Council agree and go further, commenting on its impact on the environment: “Henley-in-Arden has had modern development to the west and southeast which has partially enclosed and eroded its value and sense of place on those sides of the settlement.” (Settlement Sensitivity Assessment, 2022). The legacy infrastructure has already been stretched by infill development – further development would be unsustainable.

**References:**

1. Traffic calming:

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2. Bus Frequency:

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3. Traffic accidents:

[https://www.crashmap.co.uk/Search](https://www.crashmap.co.uk/Search 4)

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5. Impact of Traffic on Environment:

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