

**WARWICK DISTRICT COUNCIL**

**CONSULTATION ON PROPOSED MODIFICATIONS (2016)  
RESPONSE FORM**

**STATEMENT  
ON BEHALF OF MR EDWARD WALPOLE BROWN**

We will comment on the Plan and the Proposed Modifications in two sections. The first section is to address specifically general comments which relate to the Plan and by reference to questions 7 and 8 in the response form and then secondly, we make further comment in our analysis on the actual modifications proposed which do, to an extent, interlink with our comments on 7 and 8 of the response form.

**Response Form**

<b><u>Question</u></b>	<b><u>Comment</u></b>								
7	<p>They are unsound because site allocations, particularly those proposed within the villages, has not been reasonably assessed, consulted upon and due consideration given to factors which should be taken into account in line with the NPPF and the principles of sustainable Planning. Insufficient regard has been given to the suitability of other sites and the strategy and allocations are flawed. We refer back to previous comments submitted and in particular, with regard to the proposed allocation of land at Hatton Park.</p> <p>We consider to make the Plan sound, sustainable and to derive community benefits at our client's site at Hatton Green, which is Site Reference R73 in the 2015 SHLAA should be allocated.</p> <p>We confirm again – there may be duplication here with previous comments submitted, that some of the reasons for this:</p>								
	<table><tr><td>1.</td><td>Hatton School is a much sought after education establishment with very good Ofsted reports. The Governors of the School have indicated that they would be interested in a scheme, in line with what we have proposed, that would produce:</td></tr><tr><td>(1)</td><td>Improved access.</td></tr><tr><td>(2)</td><td>A reduction in the amount of congestion which takes place in Hatton Green. The main road through Hatton Green becomes extremely congested in the morning and evening when children are being delivered to or collected from the School and also this does create issues where the Village Road (The Green) meets the Hockley Road to the south and the Birmingham Road to the north. A new improved access onto the Birmingham Road to a car park area which can be used for both the School and the Church would significantly improve the situation.</td></tr><tr><td>(3)</td><td>The ability to expand the classrooms and playing facilities. Evidence of support from the School will be provided in due course.</td></tr></table>	1.	Hatton School is a much sought after education establishment with very good Ofsted reports. The Governors of the School have indicated that they would be interested in a scheme, in line with what we have proposed, that would produce:	(1)	Improved access.	(2)	A reduction in the amount of congestion which takes place in Hatton Green. The main road through Hatton Green becomes extremely congested in the morning and evening when children are being delivered to or collected from the School and also this does create issues where the Village Road (The Green) meets the Hockley Road to the south and the Birmingham Road to the north. A new improved access onto the Birmingham Road to a car park area which can be used for both the School and the Church would significantly improve the situation.	(3)	The ability to expand the classrooms and playing facilities. Evidence of support from the School will be provided in due course.
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	<table><tr><td>2.</td><td>A well designed scheme will not be detrimental and cause substantial harm to the Grade 2 listed Holy Trinity Church. As is evidenced by the proposal which we have submitted, reinforcing the setting by tree planting, being careful not to focus too much built development immediately adjoining the Church and also providing car parking will in part make sure substantial harm is not caused and</td></tr></table>	2.	A well designed scheme will not be detrimental and cause substantial harm to the Grade 2 listed Holy Trinity Church. As is evidenced by the proposal which we have submitted, reinforcing the setting by tree planting, being careful not to focus too much built development immediately adjoining the Church and also providing car parking will in part make sure substantial harm is not caused and						
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<b><u>Question</u></b>	<b><u>Comment</u></b>
	there will also be benefits that will accrue. The Church desperately needs car parking and this can be provided as part of a joint scheme with the adjoining Ferncumbe Primary School as referred to before. An inspection of the site will show that works are now needed to the Church and also the trees surrounding are mature and further strategic planting would be of benefit to enhance the setting and protect it in the longer term. This is something which our scheme can achieve.
	3. It will provide an opportunity for the expansion of a popular school which is strategically well positioned to serve expected growth in the area. It is a very desirable School sought after by local people and it is in a much better location for accessibility to other schools where expansion is proposed. We cite, for example, the Budbrooke Primary School. This has poor facilities and an extremely poor access. Surprisingly, from a sustainability and transport viewpoint, a SHLAA report identifies that Primary places will be provided by enhancements to Budbrooke School which is less suitable and is further away than the Primary School at Hatton Green. As is alluded to elsewhere in this Paper, the access to Budbrooke is poor, as is indeed its reputation, and enhancing the facilities at the Hatton Green School is a much more acceptable sustainable planning solution.
	4. The overall spatial policies remain questionable particularly the addition of a further large urban extension. Many of the urban extensions are in multiple ownership and could take a considerable amount of time to secure the site assessment, procure the infrastructure and to start the process of building when agreements are needed between a number of Landowners and Developers. It is not everybody's choice to live in large urban developments such as is proposed in strategic urban areas and there should be greater choice and a much greater allocation of housing to village sites which will help support the infrastructure and indeed create the opportunities as is illustrated by the scheme which we are proposing at Hatton Green. As a single owner site with good access and community benefits there could be a rapid delivery of much needed housing growth in a good location that can be dealt with in a sensible way through discussions and a proper Planning exercise. Many Councils that we deal with now are looking to create opportunity and to build a more balanced housing base with choice. This can be provided in this case with high quality housing in a nice rural location. Consideration should be given to the spatial distribution to enable more to be built in village sites and also the relative merits of the various sites should be considered in greater detail rather than the blanket equal proportions that are proposed. Also fundamentally, as alluded to before, there are serious question marks over the appropriateness of further allocations of land at Hatton Park. We comment on this at 8 below.
8.	The land at Hatton Green (Site R73 in the 2015 SHLAA) should be allocated in addition to those proposed or in substitution for other less desirable sites particularly those at Hatton Park. The sites which are proposed offer by comparison very few benefits compared to our client's proposals. We also draw to your

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	attention the fact that a previous strategic Plan review and the Report by the Inspector indicated that expansion of Hatton Park would be inappropriate. This seems to have been ignored in considering strategic allocations, the spatial distribution and the choice of villages which should receive growth. In terms of facilities, Hatton Park has a small shop and a community hall. The adjacent Hatton Green has a Village Hall (very successful), a Church and a thriving Primary School in close proximity. Our client could also assist with much needed car parking at the Village Hall. We would at this stage draw to your attention the salient points in the Report which was undertaken by a Clive A Richardson in 2006 on the Warwick District Local Plan 1996 to 2011. We would particularly draw to your attention the following from Chapter 14 of that Report. This completely undermines the proposed allocation of additional property at Hatton Park.
	The Inspector's appraisal and conclusions in the following should be considered:
	<b>14.2.2 – General background.</b>
	<b>14.2.5 – The analysis of what was proposed the fact that the initial development of the sites was carefully controlled through a Planning Brief – any additional development here would, I feel, be likely to put pressure on community facilities and infrastructure and we would be out of scale with the setting of the site. I consider that removing the settlement from the Green Belt to facilitate future development would risk harming the special character of this newly formed community.</b>
	<b>14.2.6 – Hatton Park/Hatton Village is not recognised as a limited Growth Village in the revised Deposit Plan. Identifying a settlement boundary is, in my view, unnecessary and inappropriate. It will put pressure on land within the boundary for further development that would be likely to damage the character of the area and the setting of the community. Hatton Park has reached its natural boundaries set by the parkland of the former hospitals.</b>
	<b>14.2.6 – Whilst we appreciate time has moved on, the opening statement by the Inspector is pertinent to our observations and we quote:</b>  <b>I am content that there is no evidence to suggest that further development is required at Hatton Park to make it sustainable. The development is balanced.</b>
	<b>14.2.7 – Then goes onto comment about those that have commented before about an extension of Hatton Park and generally supporting the view that its retention in the Green Belt was appropriate. It is accepted that, in view of the development demands in the area, releases from the Green Belt will be necessary but we feel this is an inappropriate location for that to take place.</b>
	<b>In summary:</b>
<b>1.</b>	<b>We contend that facilitating some additional growth at Hatton Green will</b>

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	make the Plan sound and it will offer much needed improvements for the School, Church and the community generally to offer a variety in the housing base.
	2. Meet the aspirations of the District.
	3. Provide housing that can be built quickly to fulfil shortfalls in housing supply and additional delays that are expected from the delivery of other large strategic urban extensions.

**Proposed Modifications**

<b>No</b>	<b>Page</b>	<b>Modification Number</b>	<b>Statement</b>
	2	1	There is insufficient reference in the mix of homes needed to cater for a variety of housing, not just large scale strategic urban extensions and other large scale schemes. There must be a variety of housing sites provided across the whole District.
	3	3	In passing we would make an observation that our client's site at Hatton Green does fit with this Spatial Strategy and more so than other areas identified which we will be challenging as part of the Inquiry process.
	4	6	We challenge the need to accommodate windfall sites as part of the overall assessment and again challenge the fact that our client's site is not allocated and there is insufficient flexibility in the Plan Policies to cater for good sensible limited development in village locations that will produce community facilities and other benefits.
		7	This does allude to the fact that there is a real possibility that some sites may not come forward and it is important, therefore, to make sure that there is if anything an over allocation to make sure that the targets can be met and the housing delivery can then be managed both through what happens in the market place generally and by the way consents are granted.
	5 & 6	8	There should be an increase in the distribution of houses to the Growth Villages and the rural area. As alluded to before, a number of Growth Villages should be expanded or a further category produced for other village locations where sensible sustainable limited housing growth can occur consistent with general Plan Policies.
	6	9	We challenge the 2015 SHLAA assessment because there has been insufficient regard of the scale of development proposed, the way the impact on the Church can be mitigated and also the fact that the benefits that can be brought to the village have been underestimated and not taken into consideration.
	8/9/10	14	Generally we contend that there has been an over allocation of large strategic sites which do not deliver community benefits and a diversity of housing growth that meets with general requirements. Also, as is

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			alluded to in Modification 15 on pages 10 and 11 of the Modifications, we also again make an observation that there are many sites which are in multiple ownership and this, when there are different developers involved means that it will be extremely difficult to deliver in a comprehensive and speedy way, sustainable growth. Inevitably there will be difficulties in bringing a Masterplan and infrastructure together in a coordinated way which could result in the lack of delivery which is essential given the numbers which need to be accommodated in a short period of time in accordance with the proposed Plan.
	<b>11/12</b>	<b>16</b>	We maintain our objection up to the allocation of Hatton Park Sites H28 and H53 and their removal from the Green Belt.
	<b>14/15 /16/ 17</b>	<b>19</b>	To maintain our objection to the proposed allocations, etc. of Sites H28 and H53 at Hatton Park and the fact that Hatton Green has still not be classified as a Growth Village or another category created and generally the inappropriateness of some of the sites indicated. They lead to development in far less sustainable and appropriate locations and will be challenged in the Inquiry process.
	<b>30</b>	<b>10</b>	Again would challenge reference to the allocation of the sites at Hatton Park and also some of the other allocations proposed which we contend should be treated in a less favourable way than our client's site at Hatton Green.
	<b>39</b>	<b>Appendix C</b>	Again to omit reference to sites proposed to be allocated at Hatton Park.