# Warwick District Local Plan Revised Development Strategy Consultation

Representations by

THE HATTON ESTATE & LINDEN HOMES



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### 1.0 INTRODUCTION

- 1.1 The comments set out below are made jointly by The Hatton Estate ("HE") and Linden Homes ("LH") in response to the Warwick Local Plan: Revised Development Strategy Consultation currently being undertaken by Warwick District Council.
- 1.2 This consultation response focuses primarily on the merits of future development at Hatton Station with reference to the Council's evidence base and the National Planning Policy Framework (NPPF).

# 2.0 COMMENTS ON REVISED DEVELOPMENT STRATEGY

### General

- 2.1 HE & LH support the general thrust of the Revised Development Strategy (RDS), particularly the recognition at Paragraph 4.4.5 that supporting only the larger rural settlements runs the risk of ignoring housing needs at the District's smaller rural settlements. HE & LH are also encouraged that Paragraph 4.4.5 recognises the complexity of the District's rural areas and the assistance that future development can provide to supporting the rural economy and protection of local services and facilities.
- 2.2 The Council's approach to the District's rural areas is in line with the Government approach contained in the NPPF, which states at Paragraph 54 that "In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing..." Paragraph 54 goes on to state that "Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs."



- 2.3 In terms of locating housing in rural areas, the NPPF states at Paragraph 55 that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."
- 2.4 HE & LH welcome the consistency of the RDS with the NPPF in this regard.

## **Hatton Station - Sustainability**

- 2.5 Table 3 of the RDS identifies 2 groups of villages across the District, namely "smaller and feeder villages" and "very small villages and hamlets". The groupings in Table 3 are predicated on the findings of the Council's Settlement Hierarchy Report (SHR). Hatton Station is identified as being one of the District's "very small villages", having scored 14 points when assessed against the sustainability criteria set out at Appendix 3 of the SHR. Although HE & LH acknowledge that Hatton Station is a small settlement, it is important to note that it is the only settlement listed in Table 3, which has a rail station and therefore rail service.
- In the context of the above, HE & LH are concerned that the assessment criteria set out at Appendix 3 of the SHR does not give due weight to the provision of the rail service from Hatton Station. Specifically, HE & LH would question why the assessment criteria only consider 'access to main towns by public transport' in terms of busses and not train. Hatton Station scores 0 points against this criterion, when in reality, Hatton Station benefits from excellent public transport (train) links to Warwick and further afield. HE & LH would argue that the SHR should be amended to rectify this inconsistency. Any amendment to the SHR is likely to result in Hatton Station receiving an additional 3 points and therefore being elevated to the 2<sup>nd</sup> most sustainable small village.
- 2.7 HE & LH would argue that additional housing growth at Hatton Station would be consistent with the overriding principles of sustainable development in the rural areas, as it would be located at a sustainable location, support local

services and facilities and assist Hatton Station in continuing to provide an important role in the context of the surrounding village network.

### New Village Envelopes/Green Belt Review

- 2.8 Paragraph 4.4.6 of the RDS makes provision for the establishment of new village envelopes to allow for future infill or groups of dwellings at the District's villages, provided it is practical and would not compromise the open character of the Green Belt. As set out above, HE & LH's view is that future residential development at Hatton Station would accord with the provisions of the NPPF in terms of sustainable rural development, therefore, in order to facilitate future growth at Hatton Station, a new village envelope should be pursued.
- 2.9 Paragraph 86 of the NPPF recognises that unless it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be excluded from the Green Belt. HE & LH's view is that based on the advice in the NPPF, Hatton Station should be excluded from the Green Belt and a new village envelope drawn, which "insets" the village within the Green Belt.
- 2.10 NPPF paragraph 85 sets out 6 bullet points that local planning authorities should consider when defining new Green Belt boundaries, namely:
  - Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
  - Not include land which it is unnecessary to keep permanently open;
  - Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green belt, in order to meet longerterm development needs stretching well beyond the plan period;
  - Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent



development of safeguarded land should only be granted following a Local Plan review which proposes the development;

- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.11 In undertaking a review of the current Green Belt boundary and defining a new village envelope to facilitate future growth at Hatton Station, HE & LH's view is that the land to the west of Station Road (SHLAA Site R71) should be included. The inclusion of Site R71 within the new village envelope, would accord with the relevant criteria of NPPF Paragraph 85 as follows:
  - The RDS recognises the need for development at the District's rural villages to support services and facilities and promote sustainable development. Inclusion of Site R71 is therefore consistent with the Local Plan Strategy;
  - Due to the location and physical characteristics of the site, it is unnecessary to keep the site permanently open;
  - The site benefits from strongly defined and defensible boundaries.
    The site is bounded by the existing road network, which represents permanent, physical features.
- 2.12 In addition to the above, Site R71 does not serve any of the 5 purposes of the Green Belt as set out at Paragraph 80 of the NPPF, as demonstrated below:

### 1) To check the unrestricted sprawl of large built-up areas

Hatton Station is not a large built-up area. Release of Site R71 would not result in unrestricted sprawl as the site has strong defensible boundaries.



#### 2) To prevent neighbouring towns merging into one another

Release of Site R71, would not result in neighbouring settlements merging into one another.

#### 3) To assist in safeguarding the countryside

Site R71 is well screened from the countryside and is bordered by strong, permanent, defensible boundaries. The site reads as part of the settlement and as such development would not prejudice the safeguarding of the countryside.

#### To preserve the setting and special character of historic towns 4)

Hatton Station has no designated historic conservation area. Release of Site R71, would not result in any detriment to the setting and special character of an historic town.

### 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

HE & LH are not aware of any derelict or previously developed sites in Hatton Station, which could be recycled or assist in urban regeneration.

#### 3.0 **SUMMARY AND CONCLUSION**

- 3.1 HE and LH support the overall thrust of the RDS in terms of the approach to the rural areas and welcomes the recognition at Paragraph 4.4.5 of the assistance that future housing development can provide to supporting the rural economy and protection of local services and facilities within the District's rural villages.
- 3.2 Table 3 of the RDS lists the District's smaller villages, including Hatton Station. The categorisation of these villages is predicated on the findings of



the SHR. Hatton Station is the only village in Table 3 that has a rail station. HE & LH's view is that the assessment criteria of the SHR do not fully take into consideration the increased access to main towns that the rail station offers. HE & LH's view is that when fully considered, the rail station would elevate Hatton Station in terms of sustainability.

- 3.3 Due to the recognition of the need for additional housing in the rural villages and the sustainability of Hatton Station, HE & LH's view is that a new village envelope/review of the Green Belt boundary at Hatton Station should be pursued. The land to the west of Station Road (SHLAA Site R71) represents a logical extension to the village envelope and does not serve any of the 5 purposes of the Green Belt as set out at Paragraph 80 of the NPPF. Site R71 also falls squarely within the criteria for reviewing Green belt boundaries as established at Paragraph 85 of the NPPF.
- 3.4 The Inclusion of Site R71 within Hatton Station's new village envelope would assist the delivery of much needed housing in a practical manner without compromising the open character of the Green Belt.

