

Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

RESPONSE FROM
HATTON PARISH COUNCIL

If your comments relate to more than one proposed Modification you will need to complete a separate Part B of this form for each representation.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the Modifications have been made available (see the table below). You can also respond online using the Council's e Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be returned by **4.45pm on Friday 22 April 2016**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Leamington Town Hall, Parade, Royal Leamington Spa
- Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
- Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
- Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
- Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
- Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
- Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title

HATTON PARISH COUNCIL

First Name

Katherine

Last Name

Skudra.

Job Title (where relevant)

CLERK

Organisation (where relevant)

Address Line 1

Address Line 2

Address Line 3

Address Line 4

Postcode

Telephone number

Email address

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Modifications to the appointed Inspector

Yes No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes No

The adoption of the Local Plan.

Yes No

For Official Use Only

Person ID:

Rep ID:

Part B - Your Representations

Please note: this section will need to be completed for each representation you make

4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

Modification or SA:	16
Mod. Number:	
Paragraph Number	
Mod. Policies Map Number:	POLICIES MAP 21 - HATTON PARK

5. Do you consider the Local Plan is :

5.1 Legally Compliant? Yes No

5.2 Sound? Yes No

6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

Positively Prepared:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

See attached sheets (3)

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached sheets (3)

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

For Official Use Only

Person ID:

Rep ID:

Warwick District Council - Modified Local Plan February 2016 – relating to Modification 16, Map 21 Hatton Park, H28 and H53

Submission by Hatton Parish Council

- The Council's view of the Plan in general remains as previously, and as detailed in our response to the Publication draft, revised as above. In particular we remain deeply concerned by the change to the character of Warwick District by the projected increase in population, and encroachment on the Green Belt.
- However, it is understood that, for whatever reasons the Inspector has determined that 16,776 dwellings shall be built if the Plan is to succeed, and that the law is such that failure of the plan would lead to the imposition of a Plan by the DCLG and thus probably more extensive, and certainly less controlled development. This further response is based on acceptance of this understanding, and the views expressed at a public meeting held to discuss the modifications, and attended by over 100 residents.
- Infrastructure: It is proposed that a total of 175 homes are built on Hatton Park, increasing the estate by 25%. This, along with 245 homes on the adjacent village of Hampton Magna will place significant strain on the local infrastructure:
Primary Education: At present, children from Hatton Park attend Ferncumbe School, Hatton, and Budbrooke School, Hampton Magna both about 1.5 miles distant and accessed by roads only usable by motor vehicle thus adding considerably to rush hour traffic. It is proposed that the additional places will be provided by expansion of Budbrooke School. There is therefore a strong case for a new primary school on Hatton, within walking distance for most of the families and which would make a valuable contribution to the social fabric of the estate.
Highways: There is already considerable congestion on A4177 towards Warwick at peak times and this will be exacerbated by the increased population of Hatton, Hampton Magna and other villages to the north and west of Warwick. The proposed engineering works at the A46/A4177 roundabout will also delay eastbound traffic towards Warwick. This is a matter of great concern to local residents as the eventual point of constriction is Warwick centre, and there is no way this can be relieved. The Plan does not contain any realistic provision for the mitigation of this problem.
Health: GP surgeries are available in Hampton Magna and Warwick. Again this will generate more traffic. With or without additional housing, it is unlikely that a branch surgery on the estate would be viable. The additional burden on Hospital services resulting from the increased population of South Warwickshire, on top of demographic and other factors does not appear to have been addressed.
Communications: Even at this early stage of the planning process, there should be a commitment to connect all new homes to superfast broadband or its then equivalent.
- Site H28, Land north of Birmingham Rd.: The original draft proposed development of the whole area bounded by Hatton Park, the Birmingham Rd., the drive to KEVII Park and Smith's Covert (7.8h) for 90 dwellings. The Modified Plan proposes 120 dwellings on 5.1h at a density of 35 dwellings per hectare of the 67% developable proportion of the site. This leaves strips of land to the north and east; the reason given is to protect the environmentally sensitive ancient woodland (Smith's Covert) and hedgerow bordering the KEVII drive (which is of no recognised ecological

significance). These parcels of land are not agriculturally viable and there is no indication as to how dereliction will be prevented.

The Parish Council considers that it would be preferable to include the full 7.8h in the plan. This would allow:

- 1h to be set aside for amenities. In the past, residents have requested allotments which, if situated adjacent to Smith's Covert, together with soft landscaping, would provide more ecological protection than the current arable cultivation.
 - Ten dwellings to be transferred from site H53 (Brownley Green Lane), allowing both sites to be developed at about 28dph, which would be more in keeping with the open nature of Hatton Park.
 - Soft landscaping between the new and existing developments, and so lessen the impact on present residents
-
- Site H53, Land between Brownley Green Lane and Barcheston Drive: The problems of access to this site are not fully resolved. The proposed access onto Barcheston Drive will have to negotiate a considerable gradient; this will take up land, so increasing the density of the development. Another reason to transfer some of the allotted dwellings to H28. The proposed access will reduce or eliminate the recently extended Village Hall car park. There is no clear indication as to where this may be relocated.

MLT 17.04.16

Submission by Hatton Parish Council

Preparation:

- The initial consultation as to the level of development indicated a majority in favour of a low level (about 5,500 dwellings). The eventual plan proposes 12,900.
- Although the Plan has been presented to the public at the various stages of its evolution, there has been no change as a result of the response from the public opposing the overall scale of development, urbanisation of the south of the District, and encroachment on the Green Belt. The only consultees to have had any influence are those able to anticipate the outcome of the Inspector's examination. This is in conflict with the spirit, if not the letter of the Localism Act 2011.
- Site H28 (Hatton Park): The final revision of this site, reducing the site area without commensurate reduction in housing numbers took place without proper consultation with the local community, although the Local Planning Authority (LPA) was in contact with the developer involved.

Soundness:

- Housing numbers: This calculation is highly speculative and inevitably based on poor quality evidence and data. The LPA calculates a need for 12,900 dwellings, while another equally competent assessment reached a figure of 5,500. Given the pressure from developers to acquire and develop greenfield sites in areas of high property value where profit can be maximised, and given the acknowledged negative impact of over-development on the District, it would be safer to plan for the lower figure. As the plan is subject to review during its 15 year life, this could be revised upwards if need were demonstrated.
- The recently (2014) published ONS population projection shows a 29% reduction on its previous estimate. This illustrates the difficulty of predicting population trends, and thus housing requirement. The numbers should in any case be reduced accordingly. The process of 'development' is not reversible.
- Infrastructure: There is insufficient planning (including financial) for the additional infrastructure necessary to support the proposed level of growth. This would in any case be constrained by the historic nature of Warwick centre, the site and size of Warwick Hospital and the capacity of local schools.
- Sustainability: *'Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations'* [sic], (Ministerial Forward, NPPF). Increased congestion, loss of open countryside, burden on infrastructure and fundamental change to the character of the District will do nothing to better the lives of the present, or future generations.
- Green Belt: Site H28 (Hatton Park) (amongst others) lies in the Green Belt. No 'exceptional circumstances', as required by the NPPF to justify such development are identified, nor indeed exist. A Housing Needs Survey for the Parish of Hatton carried out in May 2014 demonstrated a need for 13 dwellings, for which there is already sufficient windfall and brownfield sites. In a survey for the recently prepared Parish Plan 64% opposed any further development in the Parish, and 80% opposed any change to the Green Belt

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made available to the public.

Signed:

Date:

18th April 2016

Copies of all the comments and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

For Official Use Only

Person ID:

Rep ID: