



KEEP HATTON STATION RURAL (KHSR)

RESPONSE TO THE S.W.L.P PREFERRED SITES CONSULTATION

FEBRUARY 2025



KHSR Response to the SWLP Preferred Sites Consultation
February 2025

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1. Introduction

Introduction and Summary

This report ("**Report**") is prepared by Keep Hatton Station Rural ("**KHSR**"), which comprises a group of residents of Hatton and its surrounding area.

The Report addresses a proposed new settlement at Hatton Station ("**Hatton Proposal**"), which has been expanded to include the wider area labelled B1 ("**Proposed New Settlement B1**"), and the adjacent strategic growth site SG07. These are identified in the preferred sites document (January 2025), prepared by Warwick District Council as joint promoter of the South Warwickshire Plan ("**Plan**") with Stratford-upon-Avon District Council.

It is the position of KHSR that:

- **the Hatton Proposal should not be included in the preferred sites identified for the Plan by Warwick District Council because it is so clearly fraught with delivery problems relating to infrastructure that there is no prospect of its inclusion resulting in a sound Plan.**
- **Other sites in Warwick District should be included as preferred sites instead of the Proposal.**
- **The agglomeration of the Hatton Proposal with the wider Proposed New Settlement B1/SG07 tends to obscure the very real difficulties with the Hatton Proposal by diluting them. As a result, the impacts of the Hatton Proposal are not properly characterised and there is a risk that decision-makers would misdirect themselves.**
- **The sustainability appraisal relating to Proposed New Settlement B1/SG07 is flawed and reliance upon it would jeopardise the soundness of the emerging local plan.**
- **The Green Belt appraisal of New Settlement Site B1/SG07 is inconsistent with prior appraisals, since when there has been no material change in circumstances.**

Furthermore,

- **The Hatton Proposal would not demonstrate "exceptional circumstances" under the current National Planning Policy Framework ("NPPF"), meaning that it cannot justify inclusion of Green Belt land as a new settlement.**
- **Under the NPPF (December 2024), the Hatton Proposal would not be on:**
 - **Previously developed land.**
 - **Would not be Grey Belt Land.**
 - **Is not a higher performing Green Belt site that could be made more sustainable because of the infrastructure constraints and.**
 - **Does not demonstrate "exceptional circumstances"; and**

- **The infrastructure problems set out in this Report will render the Proposal highly problematic in plan-making and delivery terms.**

Findings of this report

This report demonstrates:

- That in terms of **rail infrastructure**, Hatton station is poorly served by existing rail services; difficult to serve with additional services owing to line capacity, timetabling, rolling stock and necessary infrastructure upgrades to turn back trains at Leamington Spa; difficult to expand so as to accommodate modern rolling stock owing to its landlocked site; difficult to make accessible to mobility impaired passengers; and difficult physically to access by car or other vehicular means, on foot or by cycle from the land intended for the Hatton Proposal. Extensive third-party land would be required, meaning that any attractiveness of a single-landowner allocation would be defeated.
- In relation to **road infrastructure**, the Hatton Proposal would be reliant on heavy and expensive infrastructure to make the land of the Hatton Proposal accessible at all and would result in significant impacts on all highway networks from the Strategic Road Network to local roads and lanes surrounding the land in question. Such impacts will result from materially increased traffic on extant substandard and/or congested networks. These would be expensive and impactful, including on land elsewhere in the Green Belt. Extensive third-party land would be required, meaning that any attractiveness of a single-landowner allocation would be defeated.
- There is limited **other infrastructure** in terms of electricity, gas, water and sewage with capacity to accommodate a development in the location of the Hatton Proposal adding to its impacts, costliness and deliverability.
- The location of the proposal is of **ecological significance** for protected species, notably otter, meaning that its ability to accommodate development is constrained.
- That **healthcare** provision for such a large development as the Hatton Proposal would swamp existing provision, requiring the Proposal to support material additional facilities; and
- That **education** provision would also be required on site, but this would not only be expensive but tend to exacerbate sustainability/transport impacts since new schools on site would result in in-commuting whilst it cannot be guaranteed that all on-site children would be educated in the location itself.

KHSR considers that the Hatton Proposal would be inappropriate for other reasons, such as its impact on the Green Belt, its poor performance in Landscape and Visual terms and its effect on the amenity of existing communities and will make submissions on these points if need be. However, the findings of this report demonstrate that if the Proposal were to be included in the Plan it would be very

difficult indeed to make it sustainable, particularly in transport terms. These problems would jeopardise the delivery of the Hatton Proposal and the housing that it would seek to deliver. At the examination of the Plan these difficulties will be demonstrated to be very great indeed, risking a finding that the emerging Plan is not sound. If the Hatton Proposal were to survive to the plan itself, it would be likely to fail, which would jeopardise the true five-year land supply and delivery of housing, which would in turn risk unplanned release of land for housing. All these risks can be avoided by not proceeding with the inclusion of the Proposal in the list of preferred sites for by Warwick District Council.

All these positions would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.

The development of a new settlement around Hatton Station and Hatton Park is not appropriate and should not be pursued under proposed allocation B1/SG07 – or in part, and particularly the land Hatton Proposal. The location is inappropriate, the infrastructure inadequate and the availability of alternatives means that there is no need for this proposed settlement.

**Keep Hatton Station Rural
February 2025**

2. Green Belt considerations

National Planning Policy Framework 2024

Warwick District Council (WDC) is the local planning authority for the area of land in which the Hatton Proposal would be located. That area of land on which the Proposal would be situated is presently designated as Green Belt. Under the National Planning Policy Framework (Dec 2024) ("**NPPF 2024**") it is necessary before removing such land from the Green Belt to show that changes are subject to "exceptional circumstances ... fully evidenced and justified."

An example is given -

Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

In terms of the NPPF 2024, KHSR does not believe it is possible to demonstrate and justify exceptional circumstances, even including because the District Council cannot meet its identified need for homes, because:

- Other non-Green Belt sites exist and there is a hierarchy that should be followed before green belt land is lost.
- Even if other sites perform less well than Proposed New Settlement B1/SG07, that does not justify loss of Green Belt because "other means" exist for provision of housing, even if it did not perform as well (which is not accepted by KHSR); and
- any settlement at the location of the Hatton Proposal and the Proposed New Settlement B1/SG07 would be exceptionally difficult to make sustainable in transport and other infrastructure terms as this Report demonstrates.

NPPF 2024

Even subject to the amendments to the NPPF adopted in December 2024, the Hatton Proposal is misconceived and should not be included by Warwick District Council as a preferred site since its inclusion would not deliver a sound local plan. The Hatton Proposal should not be preferred as it is not previously developed land, is not a higher performing site that can be made sustainable and does not possess exceptional circumstances.

The Government revised the NPPF in order to enhance the delivery of new housing in particular. Among the changes that the Government made were provisions that would make removal of Green Belt designations easier, especially in respect of what it terms *Grey Belt*. The definition of Grey Belt is:

Grey belt: *For the purposes of Plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any*

of purposes (a) [to check the unrestricted sprawl of large built-up areas], (b)[to prevent neighbouring towns merging into one another], or (d)[to preserve the setting and special character of historic towns] in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

As the site of the Hatton Proposal and Proposed New Settlement B1/SG07 is not Previously Developed Land, to qualify it would need to "make a limited contribution to the three identified Green Belt purposes" to fall within that definition. The land performs well as Green Belt and KHSR reserves its right to make further, more detailed submissions on that point should it need to do so.

The Government has stated:

*We remain clear that brownfield sites should be prioritised, and our proposed changes to developing [Previously Developed Land ("PDL")] in the Green Belt (outlined above) reinforce this commitment. **To support release in the right places, we propose a sequential test to guide release.** This will ask authorities to give first consideration to PDL within in the Green Belt, before moving on to other grey belt sites, and finally to higher performing Green Belt sites where these can be made sustainable.*

KHSR notes this policy but would point out that the sequential test ought to be applied so that non-Green Belt land must be preferred after PDL and before any Green Belt site, whether PDL, Grey Belt or otherwise. There are such sites identified to and by Warwick District Council and these should be preferred as their inclusion would not jeopardise the soundness of the Plan.

The Government goes on to state:

The aim of this approach is to ensure that low quality Green Belt is identified first, while not restricting development of specific opportunities which could be made more sustainable (for example, on land around train [sic] stations). This is in recognition that not all PDL or 'Grey Belt' will be in the most suitable or sustainable location for development.

Green Belt assessment issues

The Government has now updated its policy on Green Belt and Grey Belt land within it. The WDC assessment is highly problematic as contained in the sustainability assessment, which is described below. However, there are additional issues that must be addressed in the Green Belt Review Stage 1 carried out on behalf of WDC. Many of these issues stem from agglomeration and the failure properly to characterise critical areas of Green Belt.

The site of Proposed New Settlement B1/SG07 is in part contained within "parcels" HAT1, HAT2 and HAT3, but also and largely in the vicinity of the Hatton Proposal

within BA3, which is a very broad area stretching across vast areas of the district. As a result, the Proposed New Settlement B1/SG07 area is addressed in terms of the performance of the three parcels and the Broader Area, whereas in fact it should be assessed *on its merits* in terms of the effect of the inclusion of the new settlement and **not** as a result of the perceived insensitivity of the receiving environment based upon identification of the HAT 1-3 parcels and the very extensive Broad Area 2.

If properly assessed against the Green Belt principles, the correct performance of the Proposed New Settlement B1/SG07 can be assessed as follows:

Purpose A – to check the unrestricted sprawl of large built-up areas – the proposed new settlement is adjacent to the urban area of Warwick or so close as to make no difference. There are no readily identifiable features that would check or constrain development and the result of including Proposed New Settlement B1/SG07 or any part of it in the Local Plan would be a finger of development extending along the historic Hockley Road and Birmingham Road, incongruous with the surrounding land uses. Precluding such inappropriate development means the land has a ***Strong contribution*** to Purpose A

Purpose B – to prevent neighbouring towns merging into one another – the inclusion of the proposed new settlement does not result in the merging of towns into each other, but does form part of the gap between Warwick and the Birmingham conurbation. It would have some impact on the merging of towns by extending along the historic roads between settlements and change the appreciation of separation of Warwick from other towns. The land has a ***Moderate contribution*** to purpose B.

Purpose C: to assist in safeguarding the countryside from encroachment – it is agreed that the relevant land has a ***strong contribution***.

Purpose D: to preserve the setting and special character of historic towns – because the land affected by Proposed New Settlement B1/SG07 and the Hatton Proposal lies upon the historic highways approaching Warwick and comprised in the Birmingham Road and the Hockley Road, which would approach Warwick through a country setting and Ancient Arden, the extension of the built environment of Warwick in a finger-type development along them affects the experiential element of the approach to the historic town of Warwick. The setting of Warwick in this respect receives a ***strong contribution*** from the affected land.

Purpose E: to assist in urban regeneration, encouraging recycling of urban land – it is agreed that the land has no more than a moderate contribution.

In light of the above, the areas of Proposed New Settlement B1/SG07 and the Hatton Proposal perform well as Green Belt and should not be identified under any circumstances as Grey Belt. However, even if (which is not accepted) the land could be classified as in any way acceptable for development, it could not be made sustainable in line with paragraph 115 of the NPPF and hence cannot be released.

3. Sustainability Appraisal

It is noted that Proposed New Settlement B1/SG07 was ranked 2nd as part of this appraisal. The rankings across the various sustainability objectives have been examined and found to be, in places, factually inaccurate or contradictory. Furthermore, there are instances where subjective assessments have led to unsound conclusions.

As a result, to rely upon the Sustainability Appraisal for the purpose of decision-making would jeopardize the soundness of the emerging plan. The matters addressed below result in a need to reconsider whether Proposed New Settlement Site B1 truly performs as the appraisal suggests.

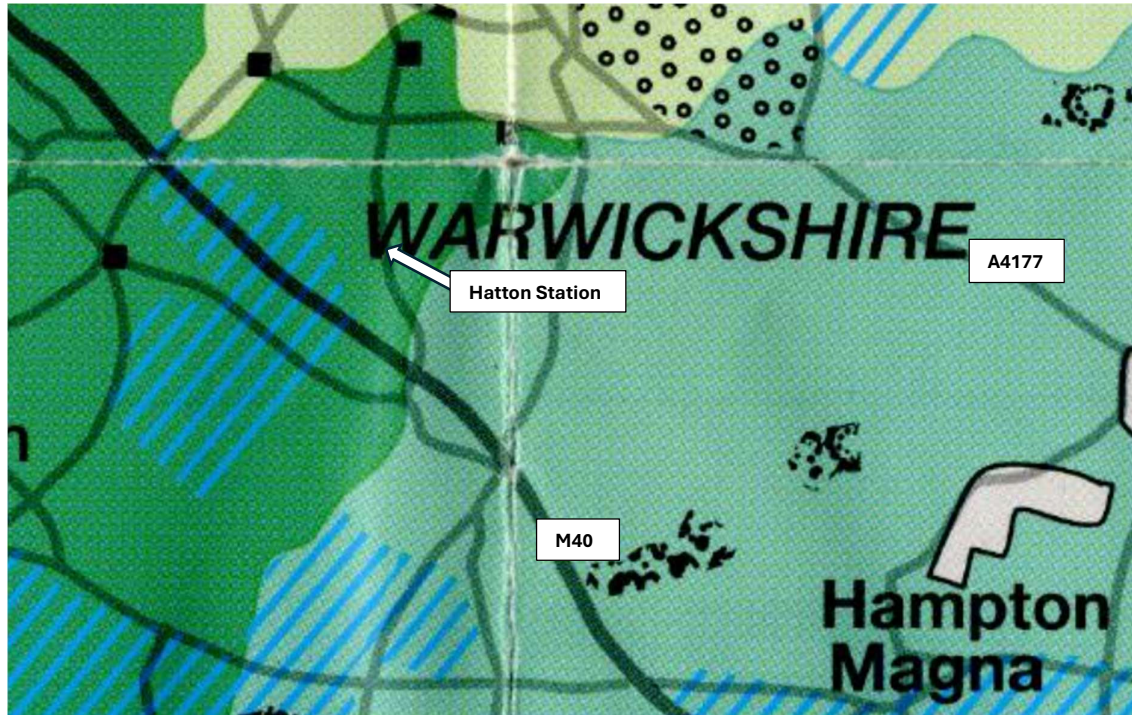
A particular concern relates to the inconsistency of measurement in terms of distances. For instance but including areas of Proposed New Settlement B1/SG07 close to Hatton Park, it is possible spuriously to suggest that the site as a whole is close to a given asset or facility. In reality, those areas closer to Hatton Station are distant from and inaccessible to the locations in respect of which they purport to perform well.

SA Objective 4: Landscape

The Sustainability Appraisal overstates the suitability of B1/SG07 for the following reasons:

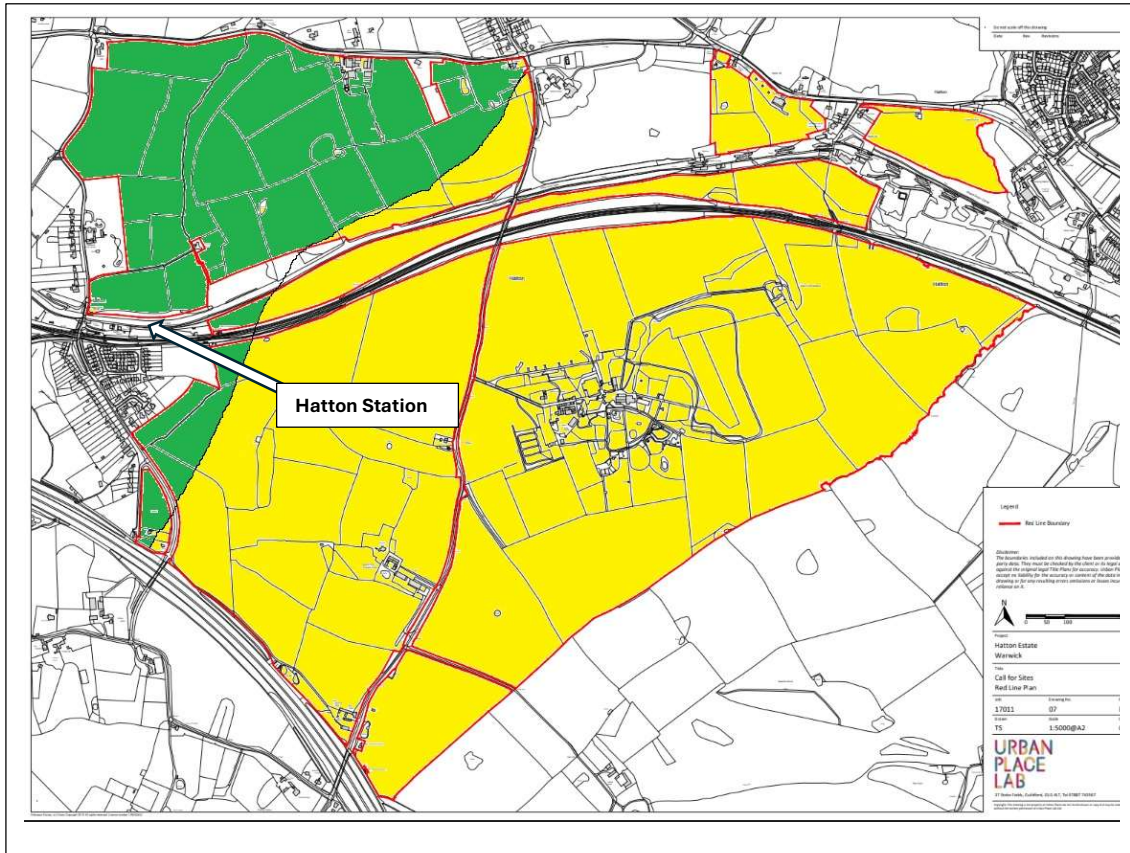
Landscape Character Assessment

There is an error at C.5.3.3. It states that B1/SG07 is located within the “Wooded Estatelands” landscape type. This is not accurate. This is an enlarged portion of the Warwickshire Landscape Guidelines map:



N.B. The location of Hatton Station has been confirmed with a member of the landscape team at Warwickshire County Council.

This shows that a large part of the land around Hatton Station falls into Ancient Arden. The map below shows how this relates to the southern part of B1 which is on the Arkwright estate – the Hatton Proposal.



Key: Green – Ancient Arden
 Green and Yellow – Hatton Proposal

There is no doubt that Ancient Arden, the only area of ancient countryside in Warwickshire, is a particularly precious landscape and quite unsuitable for housing development:

Ancient Arden

This landscape is especially significant as it is the only area of ancient countryside in Warwickshire. The irregular landscape pattern reflected in the shape of fields and the network of narrow winding lanes is the essential structural element. Maintaining this pattern is the key to conserving the ancient landscape character. The pastoral character of the landscape is also important. Though now fragmented, this creates visual unity where it survives and contributes to Ancient Arden's distinct sense of place.

Management strategy

- **Conserve and restore the ancient irregular landscape pattern**

Source: Warwickshire Landscape Guidelines, 1993, Part 2

It is notable that the recommended Management Strategy comprised in the Guidelines is: "conserve and restore". Plainly, the development of Proposed New Settlement B1/SG07 would be in conflict with this recommendation and the failure of

the Sustainability Appraisal to report and take account of this means that this has not been properly taken into consideration.

Particular reference should also be made to the Railways section of this report (below). Hatton Station sits alongside the canal conservation area and within Ancient Arden. The open views from the canal towpath, a landscape of ancient oaks and gently undulating fields indicate that it is a sensitive receptor. At present, Hatton Station is relatively unobtrusive, but it would require substantial upgrading, e.g. more car parking, if greater use were to be made of it for the purposes of Proposed New Settlement B1/SG07. This would have a material adverse impact on the landscape.

Moreover, Station Road, Dark Lane and Pinley Road are examples of sunken, winding country lanes, characteristic of Ancient Arden. For proper road access to the Hatton Station or other parts of the Hatton Proposal to be created substantial damage to these historic routes would occur – most notably Station Road in Ancient Arden itself.

Protecting *at very least* the portion of B1/SG07 which falls into Ancient Arden would serve another important purpose: the avoidance – to a limited degree - of coalescence between the community of Hatton Station and the new settlement.

Landscape Sensitivity

At C.5.4.1 in the Sustainability Appraisal, it states that:

“All 12 new settlements are located outside of the currently published Landscape Sensitivity study areas.”

It is noted that all 12 potential new settlements have been given a neutral rating as the necessary work on landscape sensitivity has not been carried out. However, this results in the importance of landscape sensitivity when this is demonstrable not being taken into account. It is unsafe to proceed without this analysis.

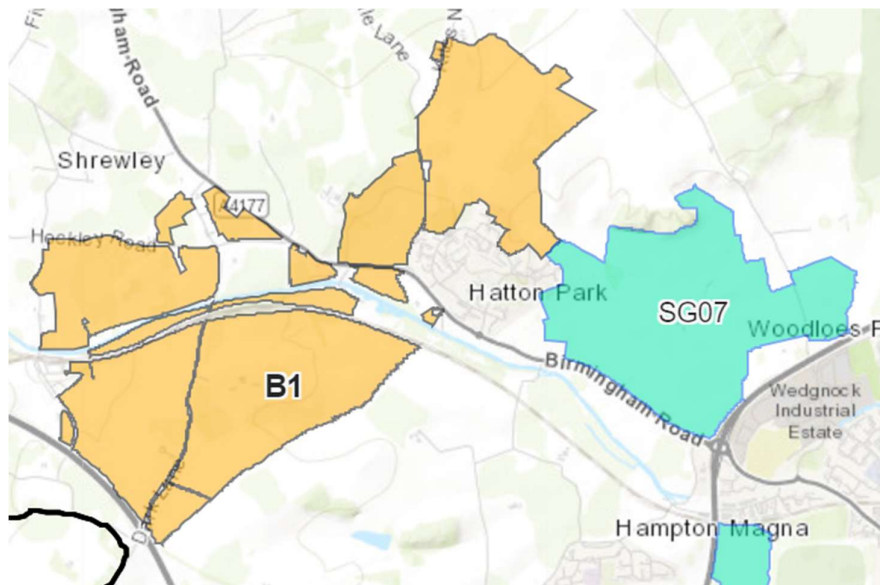
That being said, in Appendix 2: New Settlement Analysis – RAG Rating Results in the New Settlements Assessment (as at Preferred Options) – South Warwickshire Local Plan, B1 is given an Amber rating for landscape. The Amber rating derives solely from an assessment of the visual sensitivity of each LDU. Crucially, it does not look at any other aspect of landscape sensitivity. This is **very** narrow range of evidence on which to arrive at a rating.

It is necessary to refer to the Landscape Sensitivity and Ecological and Geological Study which was produced in November 2013, as part of the current local plan. This was a far more wide-ranging study of landscape sensitivity. Notably, the landscape and its sensitivity has not materially changed since the 2013 study – there is no reason to suppose that its findings do not remain valid.

Whilst the study undoubtedly needs to be updated and broadened out to cover **all** of the Proposed New Settlement B1/SG07, large **parts** of B1/SG07, at Hatton Park and Hatton Station, were assessed in 2013. It is difficult to imagine why the conclusion

should be any different when this study is revised. Virtually every area has a “high” sensitivity rating.

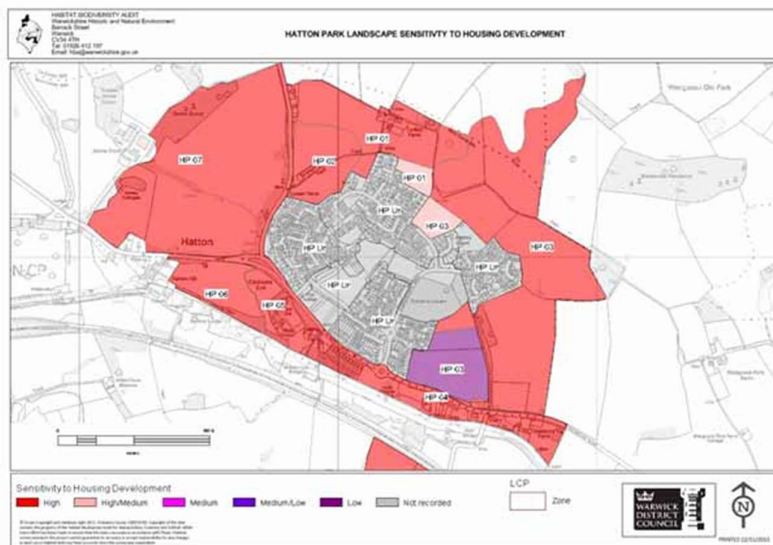
Proposed New Settlement B1 is shown here:



Source: SWLP Interactive Map

The area already subject to a sensitivity analysis in 2013 are shown below.

HATTON PARK

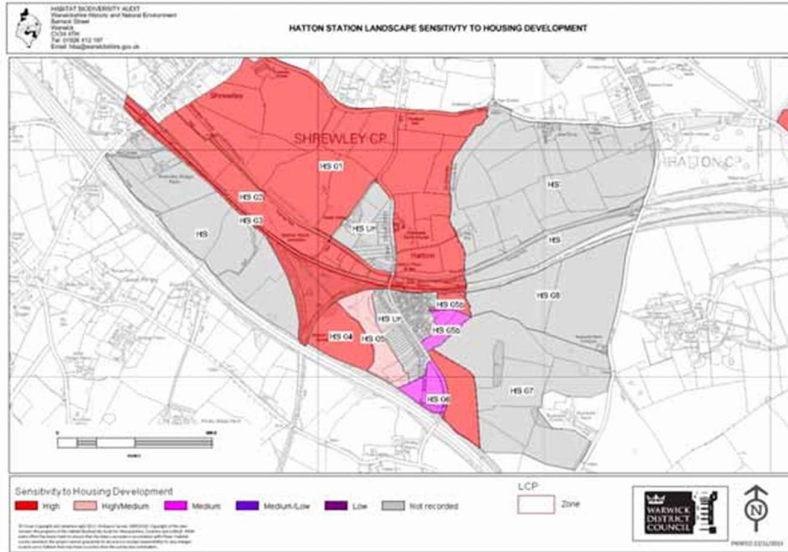


Source: Landscape Sensitivity and Ecological and Geological Study, November 2013

The red zone overlaps B1 to a large extent and shows that there is high sensitivity to development, both housing and commercial.

Below is the equivalent for Hatton Station. Again, the high proportion of areas shown in red should be noted.

HATTON STATION



Source: *Landscape Sensitivity and Ecological and Geological Study, November 2013*

This is how the “high” (red) rating is defined:

Table 1 Sensitivity Definition

Sensitivity	Definition
High	Landscape and / or visual characteristics of the zone are very vulnerable to change and / or its intrinsic values are high and the zone is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low.

Thus, a large part of Proposed New Settlement B1 was deemed unsuitable for housing or commercial development in 2013.

Whilst appreciating that further work needs to be undertaken to cover **all** of the Proposed New Settlement B1/SG07, it is quite clear that large parts of the Proposed New Settlement B1/SG07, if not all of it, will be given a high rating for landscape sensitivity. The Sustainability Appraisal ratings do not yet reflect this and nor does the New Settlements Assessment.

Special Landscape Areas

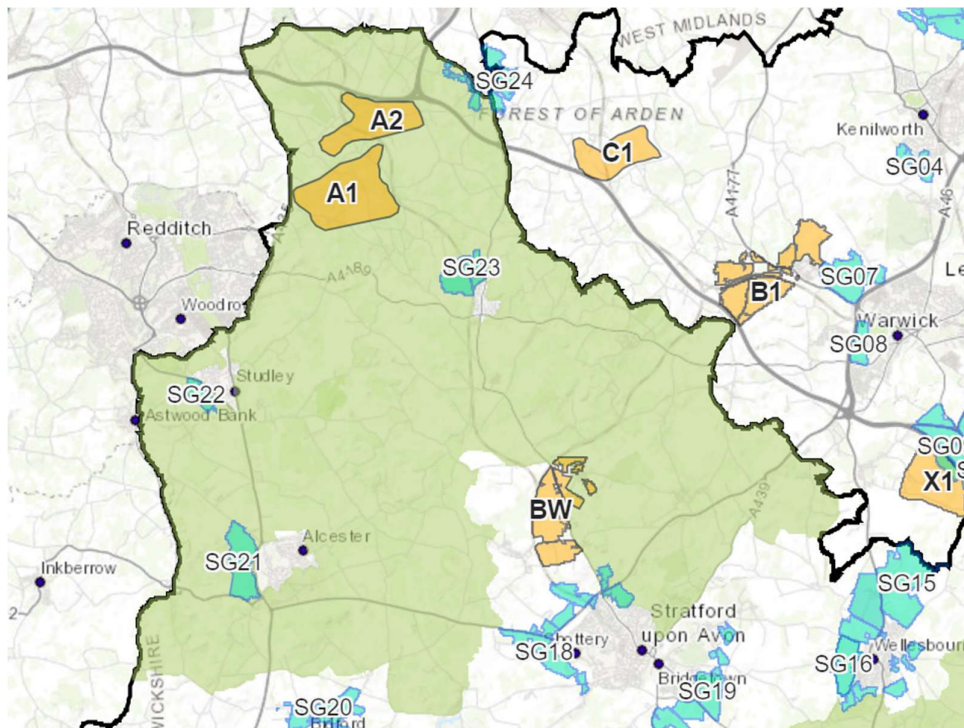
In the Preferred Options Regulation 18 Consultation, it states that, until now, only Stratford upon Avon District Council ("SDC") has had designated Special Landscape Areas. These have received a degree of protection from development. Warwick

District Council have had no such landscape designation until now but have agreed to the possibility of following Stratford's lead. The important point is that no Warwick Special Landscape Areas have thus far been identified. This particularly skews the assessment of Proposed New Settlement B1/SG07.

The consequence of this is that the Sustainability Appraisal has proceeded without any areas within Warwick District being identified as Special Landscape Areas. This has had a detrimental effect on the rating of Proposed New Settlement B1/SG07 – i.e. it performs more favourably than it ought to.

One of the Special Landscape Areas recognized by SDC is Arden. Thus, Proposed New Settlements A1 and A2 receive double minus ratings because they sit within SDC's Arden Special Landscape Area.

Arden extends into WDC and covers all of Proposed New Settlement B1/SG07, as recognized in the Sustainability Appraisal at C.5.3.3, but Proposed New Settlement B1/SG07 receives the much higher 0 rating.



Source: SWLP Interactive Map

This is illogical.

The importance of the Arden landscape area does not stop at the SDC boundary, and this statement is therefore untrue in respect of B1:

“The remaining seven new settlements (B1, E1, C1, F1, F2, X1 and X2) are located beyond the visual envelope of the SLAs and will be expected to have a negligible impact on SLAs.”

Source: Sustainability Appraisal C.5.5.3

This appraisal assumes that intervisibility between the other Proposed New Settlements (including B1) is the principal consideration. It does not have regard to the quality of the landscape in which Proposed New Settlement B1 in particular is located. If that settlement had been within SDC's administrative area, it would have been designated as an SLA and would have received a double negative in terms of its performance. It is not safe to proceed without recognizing the consistent landscape quality of Proposed New Settlement B1 with the land metres away in SDC.

Conclusion:

Landscape Character: Not all of B1 is Wooded Estate lands; some is Ancient Arden. The Sustainability Appraisal is therefore inaccurate.

Landscape Sensitivity: Large parts of B1 were subjected to sensitivity analysis in 2013 and mostly rated "high". There seems to be no reason to suppose a revision (and expansion) to this analysis would conclude any differently. The Amber rating in the New Settlements Assessment is based on data which is far too narrow.

Special Landscape Areas: B1 suffers by comparison with settlements falling within SDC's Arden Special Landscape Area and yet is **IN** the Arden regional character area. Why is there no equivalent WDC Arden Special Landscape Area?

SA Objective 7: Natural Resources

There is an error at C.8.2.1. Settlement B1 does not contain any previously developed land.

**SA Objective 10: Health
Overview**

At C.11.1.1 in the Sustainability Appraisal, it states:

"Ideally residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital providing emergency healthcare within 5km will be considered a sustainable distance."

However, at C.11.1.3, it states:

"It is acknowledged that new healthcare facilities could be provided alongside the development of a new settlement. However, it is more likely that existing healthcare facilities can be expanded to cater for the new settlement, rather than the development of a new healthcare facility."

These two statements are inconsistent.

Option 1 - expand existing facilities:

The nearest GP surgeries to any part of Proposed New Settlement B1 are at Claverdon and Hampton Magna. Neither is remotely within 10 minutes' walk of any part of B1. Claverdon does not currently provide the full range of GP services; some referrals are made to Trinity Court in Stratford.

There is no evidence that either facility has the capacity to expand, bearing in mind that each are already currently dealing with extra patients from Union View and Hampton Trove. Therefore, a favourable sustainability appraisal based upon these two locations is flawed – the assessment is simply incorrect.

Option 2 – provide a new GP surgery somewhere within B1. This ignores the size of B1. There is no location within the proposed site that everyone could reach within 10 minutes.

NHS Hospital with A&E department

At C.11.2.2, it states that:

“The majority of New Settlement is located within a sustainable distance to Warwick Hospital, located 3.3km west of the hospital.”

This is not the case. Here are some destinations within Proposed New Settlement B1 and actual mileages, measured by the shortest route from Warwick Hospital:

- Shell Garage, A4177 Birmingham Road – 3.8km
- Hatton Arms, A4177, Birmingham Road – 5.3km
- Holy Trinity Church, Hatton Green – 5.9km
- Hatton Country World, Dark Lane – 6.9km
- Hatton Station, Station Road – 8km

Thus, a journey of 3.3km from Warwick Hospital, using the most efficient route, does not reach **any part** of B1 and much of B1 sits beyond the 5km preferred limit. Hatton Station – and the Hatton Proposal represent the most distant point. Hence, the reliability of the Sustainability Appraisal is flawed in this sense also.

Distances, however, are only one factor in determining whether A&E can be reached quickly. The quality of the roads also needs to be considered. The part of Proposed New Settlement B1 which sits south of the A4177 Birmingham Road also suffers from poor connectivity.

Greenspace

At C.11.5.1, public green spaces are defined as parks, playing fields, allotments and sports facilities.

At C.11.5.2, it states at the beginning of the paragraph that B1 is within sustainable distance to existing public green spaces and then a few lines later, contradicts this, stating that B1 is located only partially within a sustainable distance. As there is no map showing those green spaces, it is impossible to say which is true.

Ranking

At C.11.7, it is explained that the greatest weighting has been given to proximity to NHS hospitals and GP surgeries as these may be considered more essential.

B1 has been given a ranking of first with a double plus awarded for the (inaccurately measured) distance to Warwick Hospital.

Conclusion

- **The comments about GP surgeries ignores the realities of both current facilities and the size of the site.**
- **The double plus awarded to B1 is inaccurate, bearing in mind the large part of the site which does not lie within a sustainable distance of Warwick Hospital. Reliance on this ranking is flawed.**

SA Objective 11: Accessibility

B1 has been ranked fifth.

At C.12.3.1, it is stated that five new settlements, including B1, are located with a sustainable distance of 2km to a railway station.

This is then contradicted further on in the same paragraph; Proposed New Settlement B1 is described as only partially located within a sustainable distance to Hatton Station. Given the issues with serving development from Hatton Station, reliance on this element of the Sustainability Appraisal is flawed – as WDC well knew when the draft preferred options were published.

SA Objective 12: Education

There is an error at C.13.4.1 which affects the ranking. A plus rating has been awarded to B1 because it is within a sustainable distance to a higher education facility. As far as can be ascertained from an extremely indistinct map, the higher education facility being referred to is Northleigh House.

Whilst this school does have a sixth form, it is a fee-paying school for children who have difficulties accessing mainstream education. It only has around 36 pupils.

Conclusion:

- **This error has unfairly disadvantaged Proposed New Settlement B1 by making it perform more favourably than it should.**

SA Objective 13: Employment

B1 has been placed first in the Sustainability Appraisal.

A plus rating is awarded when:

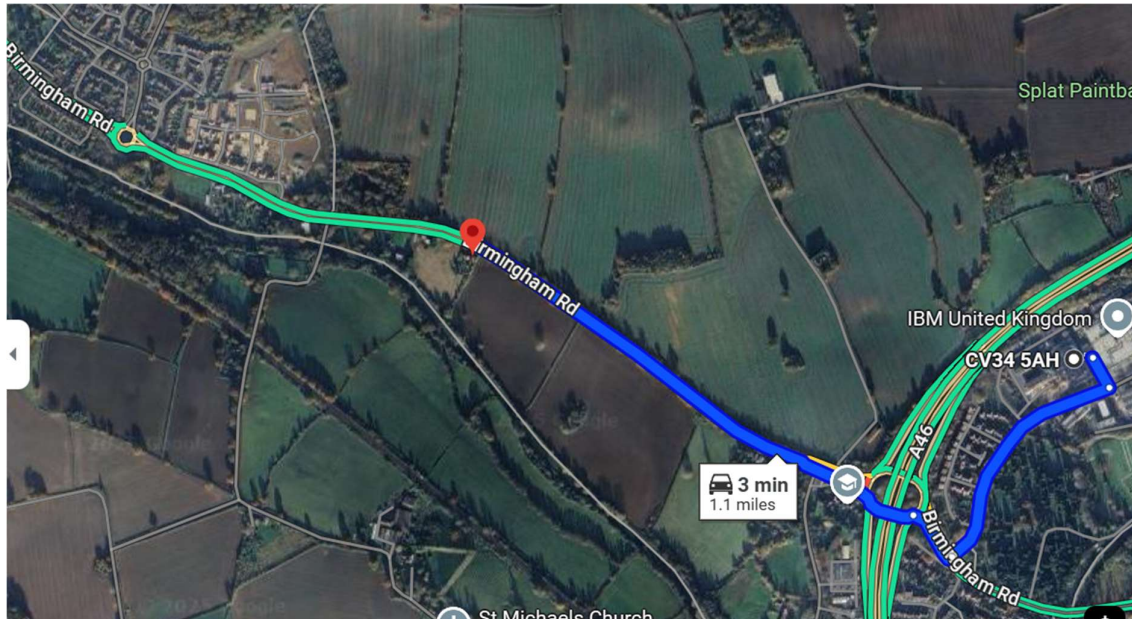
“Residential development proposals are located within 5km of a key employment location.”

Source: Sustainability Appraisal, table 2.14, page 41

The Sustainability Appraisal at C.14.2.1 states that B1 is located a sustainable distance of 1.6km from “Opus 40” which includes various business including IBM.

This is wrong for the following reasons:

- It is not clear where the 1.6km is measured from. Much of the site is significantly further away than this, particularly the Hatton Proposal.



The map shows the journey from IBM on the Opus 40 site. Travel 1.8km from here (the Shell Garage on the A4177 – the red pin) and the edge of B1 has not been reached. The area around Hatton Station is over 6km from here.

- Reference should be made to the section on Active Travel where the dangers to cyclists and pedestrians heading from B1 into Warwick are set out.

At C.14.4.2, it is acknowledged in the Sustainability Appraisal that there is little to separate sites B1, X1, X2 and G1 and yet B1 is given the highest rating because it is:

“...adjacent to the Birmingham Road, providing access to Warwick and is also located within sustainable distance to Hatton Railway Station and could potentially reduce travel time to surrounding employment locations.”

This is equally misguided for the following reasons:

- The majority of site B1 is **not** adjacent to the Birmingham Road.
- Much of B1 is **not** a sustainable distance to Hatton Station, particularly the areas north of the A4177.
- Walking or cycling to Hatton Station is **not safe** as set out in the Active Travel section.
- Issues with Hatton Station itself are many and various and discussed under the Railways section.
- Many major employers are **not** accessible by train from Hatton Station.

It is interesting to compare the location of Hatton Station with the list of Major Investment Sites set out in the consultation document. They are:

MIS.1 Jaguar Landrover/ Aston Martin Lagonda at Gaydon

MIS 2 Long Marston Airfield

MIS 3 Long Marston Rail Innovation Centre

MIS 4 South of Coventry Area (including Coventry Airport and National Battery Innovation Centre/Coventry Gateway/Whitley South)

MIS 5 Stoneleigh Deer Park

MIS 6 Stoneleigh Park

MIS 7 University of Warwick Main Campus

MIS 8 University of Warwick Wellesbourne Campus

MIS 9 Wellesbourne Airfield.

These are presumably intended to be the major employment sites of the future.

What all of these sites have in common is that they are completely impossible to reach by rail from Hatton Station, e.g. Gaydon, or extremely challenging, e.g. Coventry.

Conclusion:

- **Suggesting that B1 is within a sustainable distance Opus 40 is incorrect.**
- **There is a wholly misplaced reliance placed on Hatton Station to deliver employees to the important employment sites of the future.**
- **The rating of first in this section of the Sustainability Appraisal cannot be justified.**

4. Transport – Rail

Introduction

The NPPF now provides that:

115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

However, this report demonstrates that far from sustainable transport modes being prioritised in selecting Proposed New Settlement Site B1/SG07, the selection of that site or the Hatton Proposal would result in *disregard* of the highly problematic transport provision at Hatton Station.

The Hatton Proposal (B1/SG07) is not appropriate in this context. Specifically, inclusion of the Hatton Proposal and B1/SG07 in the context of developing along a rail corridor, which currently operates at near capacity (SWLP High Level Transport Assessment – Rail 4.11.22) is flawed. A proposed settlement of 8000 plus houses (estimated population 20000 plus) with the expectation that a significant number of people, from currently 5% up to 11%, would use rail is unrealistic given the evidence provided in this section of our report – see further below. Rather than benefiting from scope to increase rail capacity, the Hatton Proposal (B1/SG07) would lead to excessive use of road transport, which is contrary to the stated.

Understanding capacity at Hatton Station

Figures in section 4.2.4 relating to passenger usage at stations without ticket barriers and infra-red sensors which record actual passengers travel, can be very misleading, and it is unwise to make policy decisions using this data. Many adjacent small stations show a very high level of season ticket use. This is often as a result of “The Golden Ticket ruse”. In fact, Hatton and Lapworth are the nation's number one ranked stations for this as shown in (www.railforums.co.uk). Anyone anywhere in the country buys an annual season ticket for this short journey, which comes with a Gold Card giving them significant discounts on tickets anywhere in the country for a full year. Thousands of pounds can be saved in this way by regular rail users for a small outlay, currently just over £200. It is extremely unlikely they actually travel between these stations. The report's assumption using these figures, says “season tickets form a relatively high proportion of the overall total of journeys, which suggests that rail activity is predominantly used for commuting rather than for leisure.” This is very much not the case. Figures for season ticket sales at Hatton (57,508) and Lapworth (60,528) should therefore be discounted. In fact, the station is sparsely used, which truly reflects the constrained infrastructure on site.

A recent survey (2025) carried out by KHSR volunteers over a two-week period (Monday to Thursday only) showed that 81 daily journeys were made during peak times (before 09:00 and between 17:00 and 1900), and 79 off peak as well. Although off peak services are only two-hour frequency, they are well used. A total of 160 journeys per day shows that Hatton Station with its limited timetable is well supported by casual travellers (leisure) as well as regular commuters. (See *Appendices for Hatton Station Data*)

Furthermore, the increased use of Hatton Station would not be likely to deliver the West Midlands Rail Strategy 2026 – 2031, which recommends the remodelling of Leamington Spa station as well as the doubling of the Coventry to Leamington Line. Other proposals are better suited to delivering these benefits to sustainable travel. The deployment of sites *south* of Leamington Spa would be an excellent opportunity to develop the most well-connected rail centre in South Warwickshire into a bus-rail interchange. Given the recent growth in housing to the south of Leamington, and the potential of sites X1 and X2 and adjacent Strategic Growth Areas, those proposals, more truly in keeping with a rail-served, sustainable rail strategy would bring greater benefit to Warwick District. Network Rail would be more likely to invest in such a significant project, than the rebuild of the small, difficult-to-access rural station at Hatton, which has minimal scope for expansion due to significant geographical constraints, as set out in this section of the report. Promoting the Hatton Proposal and/or Proposed New Settlement B1/Site SG07 would be to forego real benefits to the wider travelling public and the district.

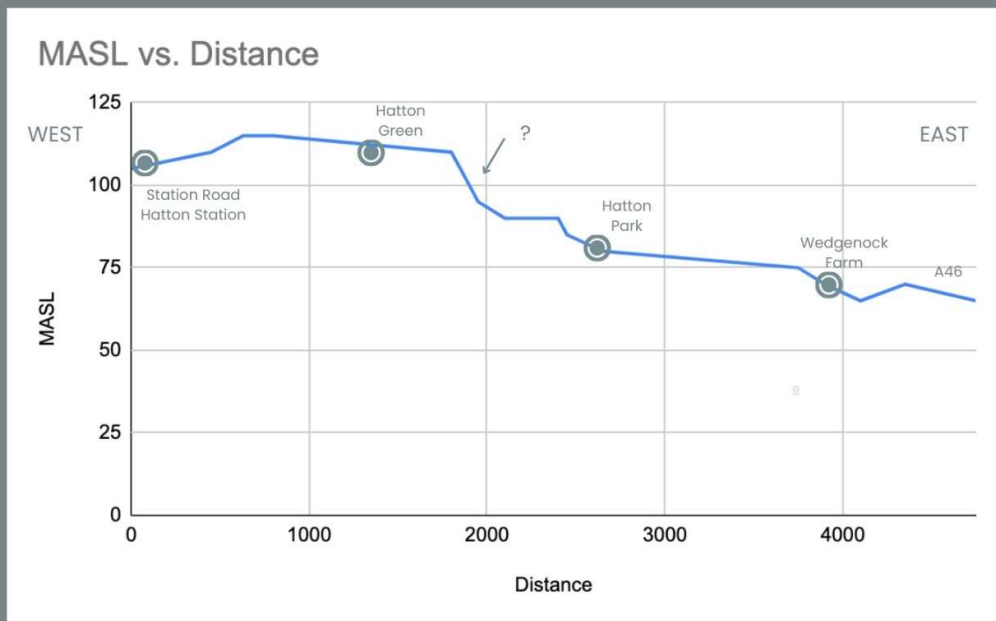
Agglomeration issues relating to transport

Furthermore, Proposed New Settlement B1 is composed of two very distinctly different areas in terms of topography (land around Hatton Park down to the A46, and land around Hatton Station and Hatton Green). Each one has its own unique features. The presence of a significant incline identified with a question mark on the diagram below, joins these two sites which could significantly impact the construction of housing and the accompanying infrastructure. Therefore, to rank the site as one entity is to fail to understand that the two areas of the site perform differently. To average out features and give a rating in all the categories given in the Site Assessment is totally misleading. For example, in the New Settlements Assessment site B1 is rated AMBER for Rail and Bus. This is not an appropriate assessment of the two parts of the site - Rail and Bus should be separated. There are no bus services at Hatton Station as the road/rail connection is not accessible due to narrow lanes, so it should be RED. At Hatton Park, where roads are better, there is still no bus service. This would suggest that it could be rated AMBER, but the agglomeration of the two distinct site areas is not appropriate and is used to suggest a better performing site than is in reality the case.

Road access for Hatton Station is poor, and capacity for expanding the station itself is, as stated previously in this section, extremely limited. This should make it AMBER/RED. Rail access for the Hatton Park section requires road travel to

Warwick Parkway station, it too having limited scope for development. That too should be at the very least AMBER/RED.

Topography of Site B1 / SG07



Detailed analysis of Hatton Station constraints

Of the five spatial growth options referenced in the Issues and Options Consultation document, the most preferred transport was rail according to the "Story So Far" Topic paper of August 2022. The five spatial growth options were formally consulted upon in January 2023.

In May 2024 the decision of Warwick District Council and Stratford-upon-Avon District Council was to abandon the *Dispersed* growth option. This has resulted in remaining options, identifying growth locations close to Hatton Station. Further, the potential new settlement areas identified in Figure 12 of the Issues and Options Consultation document shows both Area B and Area C, containing location B1 connecting at Hatton Station.

Whilst superficially, the junction at Hatton Station is an appropriate location in rail, and hence sustainable transport terms, this is in fact a fallacy. The location has material issues in terms of rail service, which would render material growth in this location, difficult to deliver. The existing rail infrastructure is inaccessible, poorly configured, and very difficult to enhance.

For a development plan to be adopted containing a settlement that relied upon the existing or expanded Hatton station, it would be necessary for Warwick District Council to be confident that these very real difficulties could be overcome. There is no evidence available that this is so, and that the inclusion of a new settlement at Hatton Station would be able to achieve this.

Any settlement in this location would need to address interfaces with the railway, mitigate its impacts on existing rail infrastructure, and to provide for growth associated with the new development. This would be costly and, absent a requirement and commitment of external funding from developer or Government, a new settlement in this location would have difficulties in terms of viability. Train fares from increased ridership at Hatton station would be most unlikely to meet the cost of enhanced infrastructure. The cost would have to be contributed in full by the developer(s) of the proposal and amortised across the development, as a whole. Early phases would need to bear the cost disproportionately, enhancing the threat to viability and risk of the plan not being sound. This applied whether considering the Hatton Proposal or the wider Proposed New Settlement B1, much of which would be distant from Hatton Station.

**What follows is an examination of the issues associated with rail transport.
Existing railway infrastructure**

The Proposal is located between the existing railway stations at Hatton and at Warwick Parkway. This is the Chiltern Main Line, which serves Leamington Spa and London Marylebone Station, and the stations of Moor Street and Snow Hill in Birmingham.

The Proposal is located closest to Hatton Station. From Hatton Station via a triangular junction, trains also serve Stratford-upon-Avon.

Hatton Station comprises three platforms, one each in an Up (London-bound, Platform 1), Down (Birmingham-bound, Platform 2) and loop (Stratford-upon-Avon, Platform 3). Each platform is approximately 124 metres in length and can serve a five-car diesel multiple unit train.



Hatton Station, looking towards Leamington, showing Platforms 1,2 & 3

Hatton Station is accessed by road from Station Road (D50930), which passes over a narrow bridge to the west of the station. The road on the bridge is sub-standard, and does not have pedestrian accommodation or street lighting, whilst Station Road, also, does not have footways at all on either side along its length – or street lighting. The station is accessed from Station Road along a narrow, steep, access road, descending to platform level. There are no footways.



Station Road (D50930) looking south across canal bridge to station access road on left and road over bridge beyond.



Rail bridge Hatton Station looking south from Station Approach

There are no scheduled bus services calling at the station as there is no bus stand. It is not known whether a “Swept Path Analysis” is available to demonstrate whether public service vehicles could access the station. This is because of the configuration of the road bridge, which links immediately with the bridge over the Grand Union Canal, which is elevated and is adjacent to Station House (listed building). The reconfiguration of the access would be very challenging.



Junction of Station Approach and Station Road, viewed from Station Approach

Hatton Station is land-locked, with the Grand Union Canal to its north, Station Road and residential properties to the west, residential properties on Ash Close and Antrobus Close to the South and the Stratford-upon Avon down junction to the east. The railway infrastructure to the west comprises the triangular junction serving Stratford-upon-Avon. To the north of the railway, west of Station Road, is located a privately owned amenity, The Mid Warwickshire Yacht Club promoting boat cruising on the canal systems as well as an as well as an area housing an animal rescue sanctuary between the canal and the railway.

Hatton Station is unmanned and has no disabled access. It has two shelters serving its three platforms. Trains of up to five carriages pick up and set down passengers.

The weekday service provides twelve Birmingham bound trains and thirteen trains running south to Leamington. There are seven trains to Stratford upon Avon and nine from there to Leamington. When engineering work affects services there is no replacement bus service due to constraints of access in the adjoining narrow country lanes.



View of Hatton Station from Platform 1 looking towards 2 & 3

The Local Transport Plan to 2026, which is currently under review, calls for an *Hourly plus Peak Extras* service on the route Birmingham-Leamington-London and an *Hourly Stratford-Leamington (London)* service. In other words, there should be a train each way, each hour. At present this modest aspiration is not met.

Trains serving Hatton and terminating at Leamington Spa are required to reverse there, and to cross the Chiltern Main Line before returning in a Down direction. This manoeuvre absorbs timetable capacity in crossing the line.

Free parking for 43 cars is provided in two car parks at Hatton Station. The access is substandard with poor visibility where the station access road joins Station Road as noted above. Access to Platform 1 is at grade from the car park level. However, access to Platform 2 and Platform 3 is by means of an open foot bridge. There is no access for disabled or mobility impaired passengers to Platform 2 or Platform 3, meaning that they must travel in an Up direction to another station with better access if they are to access services in a Down direction. This is also difficult for travellers with luggage or small children in push chairs.

Warwick Parkway station is located 5km from the western edge of the Proposal; 3.5km from the centre; and 2km from the eastern edge.

Services on the Chiltern Main Line are operated Chiltern Trains, which is owned by Arriva Trains (UK), a subsidiary of 1 Square Capital. Its franchise expires in 2027, and given the Government's policy set out in 2024, it is reasonable to assume that

the franchise will be taken back into public ownership and operation. The rolling stock used by Chiltern Trains is now 30 years old and, in their document, "*Right Route 2030 Vision*," they state that significant help from Central Government to renew or replace rolling stock would be required. Limited train refresh works are currently underway, but these do not increase capacity. Other limited services are provided by West Midlands Rail which serve Leamington Spa and Birmingham.

Hatton Proposal and new settlement location

The South Warwickshire Local plan is predicated on a transport focussed approach. For this reason, it favours locations that are apparently suitable for non-car borne travel modes.

The concept of utilising a railway corridor for locating a large new settlement in a rural area is superficially attractive. However, this location, Hatton Station, is highly problematic in terms of its ability to provide rail services because:

- The station must be accessible:

Even now, it is difficult to access the station. A new settlement would need to provide access by foot, cycle and motorised transport. The existing station is used by commuters and other travellers from an existing catchment, any changes to accessibility should not harm its current patronage.

- The services that it provides must be sufficient to be attractive in terms of:

- Destination

The purpose of sustainable transport is to provide access to appropriate destinations. The settlement growth envisaged by the South Warwickshire Local Plan, and housing mix, has not been analysed in terms of Origin and Destination information for new households. The proportion of households likely to use rail transport, and the destinations likely to be desired, is not stated.

It is difficult for Hatton Station to serve locations outside existing rail corridors within reasonable travel times such as:

- Coventry
- Nuneaton
- Rugby
- Warwick University
- Advanced manufacturing locations such as Gaydon and the planned Coventry battery plant

- *Capacity and frequency*

At present Hatton Station is served by two to five-car diesel multiple units. The trains are operated by Chiltern Railways (London-Birmingham and London-Stratford) and West Midlands Trains. Capacity and frequency of services are functions of the ability of the existing network to accommodate more services i.e. longer trains and more frequent stops.

- For additional stops at Hatton Station, it would be necessary for timetables to be considered for all services on the Chiltern main line. A following London service, behind a Hatton Station stopper *en route* to Leamington, might not fit within timetabling at the London end of the line. More modern signalling might address this, but signalling studies alone are expensive.
 - Train stopping patterns are also affected by the type of train. Commuter services to and from London, and Birmingham, are already congested in the morning and evening at peak times. To address this, longer trains are required. However, Hatton station platforms can only accommodate at most, six-car trains, which require Selective Door Opening for longer trains – eight car sets are now normal. This a safety feature that is mandatory as platforms here can only allow 5 car trains to safely access. Replacement rolling stock would likely be eight-car sets with such equipment. It would be necessary for commitment from Central Government to fund upgrades to rolling stock.
 - It is necessary to turn services between Leamington and Birmingham, at Leamington. At present this is complicated in terms of enabling services to cross from the Up to Down direction. New track infrastructure would be required. This would need to be planned years in advance to coordinate with route blockades and funding.
- The station facilities must be sufficient and attractive to users:
At present the facilities at Hatton Station are basic at best. They are not accessible except to able-bodied passengers. Achieving full accessibility would require a new pedestrian bridge with lifts as a bare minimum. This would be complex and expensive.
- Necessary measures:
So that Hatton Station could serve a new settlement of up to 8,000 houses, the following basic measures would need to be implemented:
 - New buildings would be required providing waiting rooms/covered waiting areas, along with toilets and refreshments.
 - A new, accessible footbridge, with passenger lifts to cater for passengers with luggage as well as those with mobility issues. It would be necessary to identify if this can be accommodated within the existing station infrastructure.
 - To serve a population of around 20,000 would require new rolling stock with greater capacity. This would mean trains of six or more coaches with Selective Door Opening, as explained above.
 - The current platforms would need extending, and a remodelling of the track layout would be required at Hatton Station and, potentially, elsewhere. The constraints of the site are explained above. These mean that it is difficult to provide extensions to platforms. Whilst Platform 1 could conceivably be extended, there would need to be major engineering work to extend platform

- 2/3, which is an island platform, constrained by existing trackwork, the overbridge and the need to access it from Platform 1.
- The existing timetable would need to be enhanced. This would challenge the Chiltern Main Line's capacity in a period where demand for "paths" is increasing year on year, with increased freight traffic. Container traffic to and from Southampton, along with increased aggregates movement countrywide, are two examples. Network Rail have pledged to increase freight traffic by 8% in the next four years.
 - An enhanced service would attract passengers from outside the settlement who would travel by car. It would be necessary for car parking spaces to be provided, sufficient for current and projected usage, whilst compromising neither. This applies with equal force to access to the station by road. Measures to accommodate walkers and cyclists, such as narrowing Station Road, would not be appropriate. Road access and the junction serving the station would need to be improved.
 - Conversely, pedestrian access to the station would also require major improvement with remodelling of the station access road, and creation of new footpaths. The station lies on the western edge of the proposed development which would mean most residents would need to walk a considerable distance to access the station.
 - Pedestrian and cycle routes to Hatton Station, would need to be provided. This would require access by routes other than via Station Road. This type of development-level analysis is required at this stage otherwise the superficial attractiveness of Hatton Station is not properly understood. For instance, if tunnelling beneath the railway line is proposed (or enhancement of existing culvert access) the acceptability of this to Network Rail would need to be understood.

Even for a smaller settlement, to enable sustainable transport choices, it would be necessary for most, if not all, of these measures to be put in place. This would increase the burden upon the development, with contributions being necessary either from the developer, or from the public purse. Neither a large, nor a smaller development at Hatton Station would be able to address the issues identified above and the measures considered below, increasing the likelihood of such an allocation in the development plan being un-sound.

- *Railway interfaces*

A new settlement in the Hatton Station area, on land identified to date, would require crossings of the Chiltern Main Line and the Grand Union Canal. At present these are provided by:

- Dark Lane
- Station Road

It seems clear that none of these, in their current form, would be acceptable for the purposes of a new development. Therefore, at least one new bridge would be needed. The cost and viability of this, in engineering terms, needs to be understood, both in absolute terms and in terms of the safe and efficient

operation of the railway. This adds further to the cost of developing a new settlement in the vicinity of Hatton Station. However, it can be observed that where developments elsewhere (e.g. in the vicinity of Grantham) have relied on this nature of infrastructure, local plan allocations have not been built out.

Conclusion

Whilst superficially attractive the Hatton station location is very difficult to make sustainable in terms of transport choices without very significant expenditure on railway infrastructure. Such expenditure would potentially entail costs measurable in £ multiples of millions. For an allocation of land in this location to be conceivable, the burden of such infrastructure would have to fall on the site and developer(s), materially increasing its cost and hence affecting adversely the viability of a settlement at Hatton Station. To include a site at Hatton station would endanger a finding that the Plan was sound.

5. Transport – Road

Introduction

Whatever the provision for online working, or telecommuting in new developments, reliance on the private car will remain the preponderant transport mode for the SWLP new settlements. This remains the case in spite of the proximity of rail infrastructure, especially given its limited capacity, whether or not public transport is provided. Provision for a substantial number of daily car journeys will be needed, for commuting and scholastic journeys, the latter potentially being in-bound as well as out-bound.

This location (B1/SG07) is not well served by the existing highway infrastructure. This would, itself, require provision of substantial on-site highway networks/private roads. This is rendered relatively difficult to achieve by the presence of the Grand Union Canal, and the Chiltern Main Line Railway line on embankment. These constraints make the delivery of these sites likely to be highly problematic.

Furthermore, the offsite highway network is already constrained, making access to the trunk road, and strategic highway network, as well as logical workplace locations, difficult and hence expensive to achieve.

Existing Highway infrastructure

Site B1/SG07 is bounded by the Warwick Road (B4439) to the north, to the east it straddles Dark Lane (C 93 0). On its southern margin, it is bounded by the M40 Motorway, beyond which is Pinley Road (C136 0) and on its western limit is Station Road (D 50930). There is no nearby junction with the M40 motorway.

The Birmingham Road (A4177) is the main transport artery likely to serve these sites. It is a rural standard single carriageway road with crossroads serving the settlement of Hatton Green.



B4439 crossroads at Hatton Green

The Hockley Road (B4439) connects at its easternmost extent, with the Birmingham Road (A4177). It is subject to a 50-mph speed limit at its junction with Station Road, and a 40-mph speed limit at its junction with the Birmingham Road.



A4177 / B4439 Hockley Road junction looking towards Warwick

The Birmingham Road junction comprises a T-junction, with a link road for traffic westbound and turning towards Hatton Station and Shrewley. This junction is difficult to negotiate, particularly where traffic is heavy, and queues develop on the Hockley Road where right turning traffic waits to move.

The Birmingham Road is a main artery between Solihull, Knowle and the M42 Motorway. It connects to the Strategic Road Network (SRN) by descending *via* Hatton Park to Stanks Island on the A46 Warwick Bypass. By that route, traffic can access the M40 Motorway, some 9.6kms away.

The Birmingham Road (A4177) has recently been subject to lengthy road works to enable the construction of the Union View housing development. Those works have frequently resulted in delays and tailbacks on the Birmingham Road around the roundabout serving Hatton Park. The capacity of the Hatton Park and Union View junctions would need to be understood.

The Birmingham Road (A4177) is relatively heavily trafficked. Traffic queues develop at Stanks Island with existing traffic levels, and the capacity of these elements of the highway network would need to be understood to establish whether such development could be accommodated without major road works.



B4439, Hockley Road junction with Station Road and Green Lane

Station Road (D50930) is a narrow country road from its connection with the B4439 to the settlement of Hatton Station. The road in this location is narrow with only a limited ability for cars to pass with care, although it is in theory bi-directional. In the settlement, it is restricted at 30mph, without footways in any location. Private land extends as far as the kerb-line, making improvement to the highway and provision of footway infrastructure difficult. Beyond the settlement, a short section of Station Road, where it passes over the M40, has the capacity to allow for the bi-directional passing of cars and larger vehicles and is subject to a 50-mph speed restriction as far as its junction with Pinley Road (C136 0)



Station Road (D50930) approaching Hockley Road (B4439) junction

Station Road (D50930) crosses the Grand Union Canal and the Chiltern Main Line on two more-or-less contiguous structures, which are difficult, if not impossible, for two vehicles to traverse simultaneously in opposing directions.

The main access to Hatton Railway Station is from Station Road as its name suggests. The junction has poor visibility in either direction, particularly towards the south as the road forms a brow across the railway bridge whilst visibility is constrained by the parapets of the bridge itself. This difficult location is surrounded by existing infrastructure, developments or important land uses on all sides, making realignment extremely challenging without the acquisition of existing residential properties.



Station Road looking towards Station Approach (obscured and at a lower level) on the right



Station Road with Station Approach on the right, looking North



View from Station Approach looking South

Pedestrians walking to Hatton Station are exposed to risk as there are no footways leading to the station access road. This has been compounded by the installation of concrete impact protection barriers adjoining the road bridge. Pedestrians with mobility issues and parents with children on foot or in push chairs have reported finding this a great challenge when it is necessary to seek refuge from oncoming traffic.

In general, there is an absence of pedestrian facilities in the area, such that access on foot to schools such as Ferncumbe is not considered safe by the local education authority.

Pinley Road (C136 0) is a narrow, single-track road with passing places. It is de-restricted along its length and is not subject to highway drainage. At its north end it connects with the hamlet of Pinley and, at its southern extent, makes its junction with Dark Lane amid a cluster of dwellings close to the M40.

Dark Lane (C93 0) is a narrow country lane for much of its length, including at its junction with the B4439, where vehicles are required to pull over to allow others to pass. As a result, large delivery vehicles and coaches have difficulty accessing the road and, in common with other routes (Station Road, Pinley Road and Norton Curlieu Lane (D5275)), this has contributed to severe kerbside erosion making it extremely dangerous for cars and cyclists.



Dark Lane looking northwards towards canal bridge

Dark Lane (C93 0) crosses the Grand Union Canal on a single-track bridge, which is connected to the overbridge across the Chiltern Main Line, by a narrow chicane formed by the bridge parapets. The railway bridge here is at high elevation as the railway is in a deep cutting and comprises three tracks



Dark Lane with buses accessing Hatton Country World from Henley Road (A4189)

Dark Lane (C93 0) extends as a single-track road, with passing places, as far as the Henley Road (A4189) at Norton Lindsey. It has a junction with Norton Curlieu Lane (D 5275) which is a particularly constrained and narrow country road, passing through the hamlet of Norton Curlieu to join the Henley Road (A4189). There are no facilities for pedestrians.



Norton Curlieu Lane looking south

The B4439 road junctions at Station Road and Dark Lane, have poor visibility and limited capacity for turning traffic, as do the junctions of Dark Lane and Norton Curlieu Lane with the Henley Road.

None of the highways immediately surrounding the Hatton Station have street lighting. A number of them (Station Road, Dark Lane) have significant drainage problems and regularly flood. There is little, if any, highway drainage.

Existing infrastructure conclusions:

In common with railway infrastructure, sites B1/SG07 are highly constrained in terms of highway infrastructure –

- Access to the Western section of B1 would be dependent upon the B4439 Warwick Road, requiring new junctions
- The access to the SRN is via the B4439 and the A4177 Birmingham Road, which is constrained, particularly close to Hatton Park, Union View and Stanks Island.
- Access to the SRN to the southeast via Dark Lane and the Henley Road is reliant on narrow country lanes with poor visibility which would require upgrade as well as materially changing their character.
- Station Road, Pinley Road and Dark Lane are not suitable for internal movements and, in particular, could only provide sub-standard, if not dangerous, access to Hatton Station.
- The site itself is bisected by the Grand Union Canal and Chiltern Main Line railway line.
- There is little ancillary highway infrastructure such as street lighting or modern highway drainage in situ.

Issues specific to Site B1/SG07

As set out immediately above, the site of B1/SG07 is bisected by the Grand Union Canal and the Chiltern Main Line railway line. In terms of internal movement, this presents challenges in that community severance would be built into a development from its very outset. It would be necessary to protect the railway line from trespass, meaning that palisade fencing would need to be installed. These two features hinder the establishment of a new community and also make transport itself very difficult. There are only two existing routes to Hatton Railway Station, requiring use of Dark Lane and Station Road. The use of the railway station for sustainable transport purposes is itself materially hindered by these accessibility issues.

The proposed new access road to a development around Hatton Station, running parallel to Dark Lane, will require the building of two significant bridges crossing the canal and the deep railway cutting or, further west over the railway where it is on embankment above existing fields. This is a substantial structure as it must attain material height and would be affected by levels in any development at this location. It would be a large and very visible structure. It will also require the acquisition of land to the south of the settlement to link it to the Henley Road (A4189).

Consideration would need to be given to impacts on other links such as Pinley Road and Dark Lane as it links with the Henley Road. Potentially, Norton Curliou Lane would also be affected by traffic growth.

The Vectos Traffic Modelling Report (Jan 2023) predicts 12,517 extra car journeys per day emanating from the new settlement. 85% will be heading to Stanks Island and the A46. It is predicted in the Vectos report that this could cause a queue of 600 cars forming at the junction of the B4439 and A4177. This extra traffic flow would also be likely to have a dramatic effect on the A46 and M40 intersections, as well as the roads within Warwick.

It is necessary as a matter of policy for developments having a material effect on the SRN to mitigate such impacts. This would entail the promoter of the development funding improvements (if they are possible at all) to the A46 Stanks Island.

Warwickshire County Council assessment

Importantly for any assessment of the Hatton Proposal and/or Site B1/SG07, the NPPF states at paragraph 116:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

The development of the Hatton Proposal and/or Proposed New Settlement B1 would result in severe impacts on the strategic highway network is acknowledged by Warwick County Council, which observes:

The interdependencies between the SRN and LRN ... will require mitigation from a new settlement option in this area as well as other major growth proposals across the SWLP area to ensure that strategic and local traffic uses the most appropriate routes. As such, further improvements to the A46 Stanks junction and M40 Junction 15 are likely to be needed, albeit with the costs apportioned according to impact...

The County Council then goes on to identify that a new settlement at Hatton Proposal/Proposed New Settlement B1/SG07 would be assessed as **Amber/Red**. This plainly indicates that other sites should be preferred.

Conclusion

As for other infrastructure, the development of these locations is particularly problematic. The offsite highway network would require substantial upgrades to accommodate the exceptional demand created by road users from within the sites as well as those passing through. The physical constraints of the railway and the canal, and the nature of highways associated, the green belt characteristics of the area impose constraints that will mean such mitigation costs will be borne early in the process, which affects viability and deliverability.

6. Active Travel

Active travel is taken to mean walking and cycling. Some constraints have already been identified in the South Warwickshire Local Plan

Strategic Transport and Education Assessment of New Settlement Options (Warwickshire County Council, October 2024) but not all. For completeness, all the issues are set out below:

Cycling

A 4177 Birmingham Road (wrongly identified in this document as the A425):

It is correct that:

- The pavement is currently a shared space with pedestrians and is far too narrow to support both.
- It is dangerous to negotiate the Stanks island on a bicycle, particularly at peak times.
- The gradient on Hatton Hill could be challenging on the ascent and dangerous on the descent.
- Attempts to widen it would encroach on private land and require the removal of vegetation.

A4439 Hockley Road

This is not discussed in the above report, but it is important because it forms the route from the northern part of the Proposed New Settlement B1 to Hatton Station.

- It has no dedicated cycle path, and the existing pavement is narrow and only on one side of the road.
- It is unlit.

Station Road

This is the main access road to Hatton Station:

- It is a narrow, country lane. There is a particularly bad pinch point outside the Banana Moon nursery where it is not possible for two cars to pass each other.
- There is no pavement.
- It is not wide enough for motorists to give cyclists the 2 metres clearance required under the Highway Code.
- It has two blind bends.
- It is unlit.
- In common with other minor roads, usage by inappropriately large vehicles has eroded the side of the carriageway, leaving a dangerous ragged edge to the tarmac.
- The exit from the station has poor visibility, particularly to the south.



- The road down to the station has no cycle path, no pavement and is only wide enough for one vehicle.
- There are limited cycle racks at the station. Although it would not be unduly expensive to add bike racks, there are significant space constraints.

Dark Lane/Pinley Green Lane

- These are both single track lanes, as are many of the lanes south of the M40.

The canal towpath

This is not suitable for cyclists at present:

- Access at Hatton Station is via a set of steps. These steps are particularly difficult to negotiate due to their uneven risers. Creating step-free access would be difficult due to space constraints.



Access at Dark Lane is also via a set of steps.

- The towpath is extremely narrow for much of its length, bringing cyclists dangerously close to the water's edge. It is difficult for two bicycles to pass one another, or for a bicycle to pass a pedestrian.
- There are several places where widening the towpath would be very challenging. For example, the towpath has a significant sheer drop to one side just beyond the Station Road bridge. On the approach to Warwick, the gardens of neighbouring properties come close to the water's edge.



- Although there is a short section of towpath alongside the locks (above left) which has a proper surface, it can nevertheless be almost impassable after rain. The photo above was taken after one night of rain during a generally dry week.
- Most of the surface is unmade (right) and extremely muddy in winter. Bicycles churn up the surface creating problems for pedestrians.

- There is significantly reduced headroom under some of the bridges, creating an extra danger for cyclists. This bridge is where Dark Lane crosses the canal. There is no possibility of widening the towpath or improving the headroom without destroying an historic bridge.



Left is a bridge on the approach to Warwick. This has even more restricted headroom.

- Access to Warwick Parkway is via two unmade tracks: one is clearly an “unofficial” track.

The other track is at least level. However, both lead onto Old Budbrooke Road which does not have a cycle path.





- The towpath passes through the Canal Conservation Area and is a tranquil and picturesque walk in any season. Although improved access would be welcomed for leisure purposes, it is inappropriate to promote it as a commuter route. It is an important wildlife corridor for bats, and otters are also present.



- In order to make the towpath safe, it would have to be lit, causing disturbance to wildlife.

Walking

Walkers encounter similar problems to cyclists but there are some additional hazards.

Station Road

There are additional problems for walkers along Station Road:

- Not only is there no lighting or pavement but along much of its length there is no verge. The steeply raked sides prevent a pedestrian stepping off the road when a vehicle approaches. Station Road sits within Ancient Arden, one of the area's characteristics being lanes running between high banks. It is inappropriate to destroy its historic character.
- The blind bends can only be negotiated safely by crossing and recrossing the road to maintain the best line of sight.
- The bridge over the railway line is now bordered by recently installed high kerb stones, leaving no refuge for pedestrians.



The canal towpath

- The problems mentioned in relation to cyclists are essentially the same. However, it should be noted that encouraging the use of the route for cycling is putting pedestrians at significant risk.

Public Rights of Way

There are issues with all the PROWs which cross B1:

- They are generally accessed by kissing gate which restricts access.
- They are unmade tracks which are difficult to negotiate in winter.
- They are unlit.

As part of the development of Proposed New Settlement B1, the kissing gates could be removed, lighting installed and the surface tarmacked. However, as the paths would pass through housing estates, their essential character and purpose is lost:

the provision of a healthy, pleasant country walk with open views of fields and trees for locals and visitors alike.

Conclusion

- Whilst all the routes mentioned above are used by walkers and cyclists currently, to promote them as a **safe** means of accessing areas around Proposed New Settlement B1 and onward towards SG07 and Warwick would be inappropriate.
- Whilst some of the issues mentioned above are not insurmountable, cumulatively the problems would require significant investment to solve.
- Improvements would ruin the essential rural character of the area, depriving residents from urban areas the chance to enjoy a healthy day out in the countryside.
- The AMBER rating awarded to active travel should be RED

7. Other Infrastructure

Introduction

The Hatton Proposal/B1/SG07 relates to development of an area in which there is limited existing infrastructure provision. As such, the provision that would need to be made for the Proposal in this location would be difficult to provide without disruption to existing communities and its own impacts. A local plan allocation reliant upon such an allocation would necessarily include elements that made delivery of the Proposal at such an allocation, more costly and hence less likely. This enhances the risk of the Plan being found not to be sound.

This is a location where the provision of infrastructure is relatively complicated, and the delivery of the site is consequently more difficult. This section of the Report considers the issues associated with other infrastructure for the Proposal.

Energy Demand and Capacity Assessment

This is demonstrated by the current application for 34 houses on land to the rear of Antrobus Close / Oakdene Crescent which states it is necessary to understand how the heating demand for the houses will be met. It is stated in that case, to be by a new mains gas supply. However, this is highly unlikely as there is presently no mains gas infrastructure in the Hatton Station area, and this demonstrates the dearth of provision in this area. Shrewley Parish Council approached infrastructure providers, in around 2015, to understand the cost of providing mains gas into Hatton Station and was told it would be prohibitively expensive. As such, the provision of mains gas (whether methane or hydrogen) is problematic in this location.

Although the UK government moratorium on the fitting of gas boilers in new houses has recently been moved from 2025 to 2035, given the longer timescales for potential development of the Hatton Proposal (running out to 2050) it is assumed that gas will not be used in those properties. Therefore, for the Hatton Proposal, electricity is considered to be the likely, most carbon-appropriate primary energy source for heating.

This Report therefore aims to consider the potential levels of electrical capacity demand and the ability of existing local electrical infrastructure to meet that demand. To the extent that additional infrastructure is required, the ability to provide this is a material consideration in the decision whether or not to prefer this location for development of a new settlement under the Hatton Proposal.

Assumptions around Capacity Demand per Household:

The rating of electrical circuits ie: capacity required to meet electrical demand is measured in kVA (kilo-Volt-Amperes). This is also known as “apparent power”. In a 100% efficient system, 1kW of real power output would only need 1kVA of apparent power – but in reality, systems are not 100% efficient. The level of inefficiency varies depending on the type of load, with transformers and large motors being particular causes. For domestic settings, it is sufficient to know that to get 1kW of output from an appliance, slightly more than 1kVA of apparent power will be needed.

Given that not all loads in every household will be on all the time, it is necessary to consider a typical maximum capacity when designing a network, otherwise if the network was built assuming it needed to meet the demands of every single load simultaneously, in practice it would be significantly over-engineered.

ESBI (the network operator in Ireland) sets out the following typical levels of capacity demand per household (larger values would apply to commercial buildings, schools etc). Although from a different geography, these figures are considered appropriate for calculations at this stage, particularly given the similarities between UK and Ireland in terms of climate, housing stock and lifestyle:

- 12kVa for moderate loads
- 16kVa including large heat pumps

<https://www.esbnetworks.ie/new-connections/understanding-connection-capacity>

Thus, demand for the Hatton Proposal of 4,500 residences **between 54 and 72 MVA** (even without considering the demand for commercial and public buildings, any local manufacturing etc). For the wider New Settlement B1/SG07, the demand would be even greater with 8,000 houses).

Existing Infrastructure in the Warwick – Kenilworth – Henley-in-Arden area

The local distribution network operator (the company operating the cables, transformers, poles, smaller substations and pylons which distribute electricity to homes and almost all businesses) in our area is National Grid Electricity Distribution (“NGED” for short).

A (partial) map of existing infrastructure can be seen at:

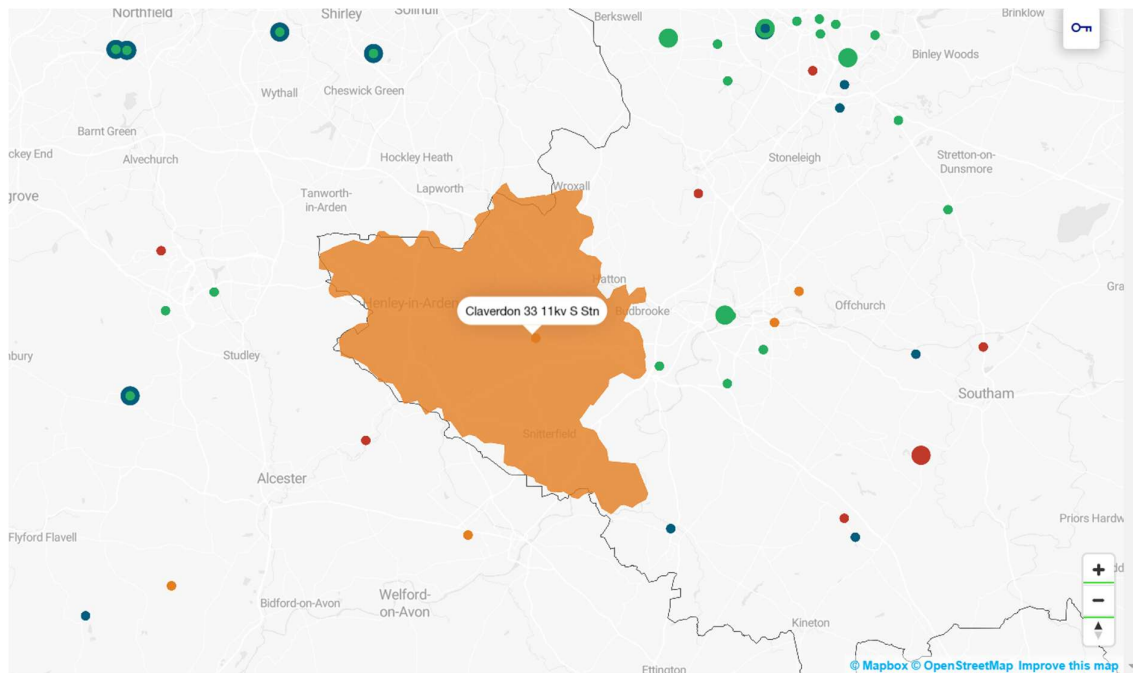
<https://openinframap.org/#12.38/52.28206/-1.63154>

NGED makes available mapping of the relevant substations and available capacity for connecting new demand (or new sources of generation):

<https://www.nationalgrid.co.uk/our-network/network-capacity-map-application>

The key piece of local infrastructure for considering availability of network capacity is the 33,000 volts /11,000-volt substation in Claverdon. From that substation, 11kV cables (typically on wooden poles or underground) run out to local substations, or transformers mounted on poles, where it is stepped down to 230 volts for single phase supply to consumers.

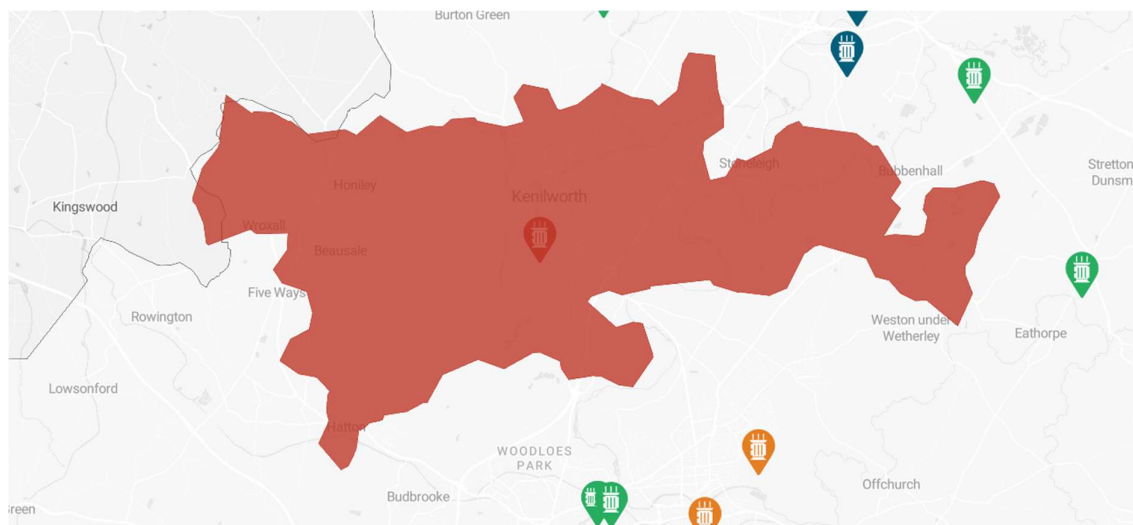
The area for which electricity is supplied via the Claverdon substation is shown on the NGED website:



As can be seen from the map, the Claverdon substation supplies a relatively large (and currently relatively low population and demand density) area.

The colour coding denotes different substations and their “demand capacity headroom” ie: the amount of additional demand which could be connected before network reinforcement was required. Currently, the Claverdon substation shows **1.43MVA (1,430kVA)** of demand capacity headroom ie: materially below the 52-74 MVA that would be required for the Proposal.

The other substation which supplies this area is even more constrained:
Kenilworth:



Available demand headroom on Kenilworth substation is already highly constrained at **0.37MVA (i.e. 370kVA)**.

The nearest substations which NGD shows as “green” for having demand headroom are at Tournament Fields (**16.89MVA**) and the Warwick 132kV substation (on the Emscote Road near Tesco, the site of the former Warwick power station) (**81.92MVA**).

Ability to Connect New Demand - Proposal

Neither of the proximate existing substations at Claverdon or Kenilworth has sufficient available demand capacity for the amount of demand needed for the Hatton Proposal of Proposed New Settlement B1/SG07, even without considering commercial and other loads (schools, healthcare, retail, leisure etc) or demand from other locations. Nor does the 16.89MVA of capacity at Tournament Fields meet the expected load requirements. The nearest substation with sufficient capacity available is the Warwick 132kV/33kV substation on the Emscote Road.

It is apparent that to facilitate a supply of appropriate capacity for the residential demand, either:

- a new 33kV circuit from the Warwick substation would need to be built (on the Emscote Road), or
- the reinforcement of existing circuits (e.g. upgrading from 11kV to 33kV on the circuit out to Claverdon or
- a new primary substation on the Warwick – Berkswell 132kV overhead line built, with a 33kV/11kV new distribution spur to feed the development.

Points to note:

- The approximate closest point of the Warwick – Berkswell 132kV line to the proposed development is at the rear of The Warwickshire Golf Club in Leek Wootton.
- 33kV can be carried on wooden poles rather than pylons. Above-ground 11kV lines would be on wooden poles but could either be carried by underground cable.
- Powers to connect the new line or cable would need to be obtained by NGED.

Conclusion – electricity supply

The location of the Hatton Proposal/Proposed New Settlement B1/SG07 is characterised by a dearth of exiting electricity distribution infrastructure. It would be necessary to undertake fairly substantial distribution network enhancements with the cost of those works falling upon the promoters. This tends to make this a relatively expensive proposal and hence harder to deliver.

Given the low level of residual capacity available from the Claverdon and Kenilworth primary substations, this makes incremental provision difficult to achieve and the substantial investment would be required on an up-front basis.

Water Supply, Drainage and Sewerage

The authors of this report have sought to establish the availability of capacity for water supply and sewerage/wastewater removal in the area of the Hatton Proposal. There is currently no information available on the current and proposed capacities for drainage, sewerage and water supply, despite requests for this having been made to Severn Trent Water, which is the water and sewerage undertaker for the area in which the Hatton Proposal is located.

Anecdotally, it is known that six-inch mains are located in Station Road, and in Pinley Road, which are located on the western and southern limits of the Hatton Proposal. The latter serves Hatton Country World. However, the ability of this network to serve 4,500 new homes is not known and it must be assumed that this would require a substantial engineering operation to provide water to the Hatton Proposal. Whilst the available capacity is not known, again it must be assumed that these works could not be provided incrementally.

This position would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.

Sewerage

The area of the Hatton Proposal is not well served by mains sewerage with many residences reliant on septic tanks on the peripheries of the land contained in the Hatton Proposal. It is understood that the sewerage system is at capacity having been constructed some time ago and no longer up to current sizing or capacity requirements.

The nearest pumped main for sewerage is at the rear of Willowbrook, Station Road, which connects to a further installation to the east of Station Road on farmland which falls into the western section of the Hatton Proposal. The nearest sewerage treatment works is in Warwick, meaning that there would need to be material investment in infrastructure in order to bring the Hatton Proposal forward.

Hatton Station's sewerage system dates back approximately 80 years and has been added to in a haphazard manner as the number of houses has increased. It relies on a convoluted network of sewer pipes, pumps and holding tanks. Blockages are not uncommon.

This position would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.

Drainage

Highway drainage in the Hatton Station area is problematic. There is no data available from Severn Trent on this topic. However, residents report being cut off from flooding to the local roads surrounding the development shown by the following photographs:



Station Road (D50930) looking south, Spring 2024



Dark Lane (C93 0) looking south, Spring 2024

Tributaries of the River Alne and River Avon flow through the western part of the Proposal and at the southwestern edge the stream crosses Station Road by an underbridge passing into a narrow culvert adjoining two properties. After a short distance it is channelled alongside the M40 before passing beneath it. This section frequently floods and is graded Level 3 flood risk.

Conclusion

Whilst less information is available in relation to water infrastructure for the area affected by the Hatton Proposal, it is immediately apparent that there is very limited

existing infrastructure available in this location in terms of water supply, or sewerage and highway drainage. Again, it is clear that material, up-front investment in major works would be required early in a proposal for it to be delivered.

This position would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.

8. THE IMPORTANCE OF RETAINING VALUABLE FARMLAND IN HATTON AND SURROUNDING AREAS



Much of the land in Warwickshire is valuable farmland, providing food for humans and livestock. The land in this proposed site is graded 3a in terms of agricultural value, which means it has a significant benefit in farming and food production.

We are however losing much of the valuable farmland to solar initiatives, rewilding and development. Large landowners are finding it much more lucrative to sell off the land to developers or lease to solar initiatives rather than retain tenant farmers on their lands.

The farmland around Hatton Station and Hatton Country World is greenbelt and forms part of the Arden Landscape.

Arden landscape is what remains of the former Forest of Arden, mentioned in many of the plays of William Shakespeare. This forest covered most of Warwickshire and its geography is that of rolling hills, pockets of ancient woodland, broad leaved deciduous trees of predominantly English Oak, Hornbeam, Sweet and Horse Chestnut, Wild service and Lime. There are small field boundaries with ancient hedgerow and ancient oak trees along with many other native species. A dispersed settlement pattern of farmsteads and hamlets with winding, narrow country lanes with thick hedgerows to each side. It is an area rich in history, with many listed farm buildings dating from medieval times. It also provides a haven for wildlife; there are Red Deer, Fox, Badgers, Bats, Grass Snakes, Slow Worms, Great Crested Newts, Butterflies and insects. Furthermore, there are many native birds that visit Warwickshire on their migration paths. The features of these beautiful green spaces make the Warwickshire Countryside so attractive for locals to walk and exercise in the fresh air and also to visitors escaping urban areas. Hatton Country World itself extolls its location as being “the ultimate destination for great days out in Warwickshire countryside, ideally situated between Birmingham, Coventry and Warwick”. The area around Hatton is also particularly popular due to the location of the Grand Union canal and the conservation

area that sits along-side it. The towpath is enjoyed by walkers, runners, and cyclists enjoying the fresh air, stunning countryside views, wildlife and leisure activities. The Hatton Lock flight constitutes the longest flight of locks on the Grand Union Canal and is popular for narrow boat holidays also enjoying the peaceful surroundings.

The geography of this farming landscape is vital in many ways. The trees and hedgerows absorb carbon, absorbing the CO₂ and sequestering it in the woody biomass and soils beneath. In one year, a tree can absorb more than 48 pounds of CO₂, this being permanently stored in its fibre during its lifespan. Thick hedgerows have a cooling effect, as well as absorbing heat they also absorb air pollution and dust particles such as exhaust fumes. Unfortunately, in the last 75 years we have lost over 50% of our native hedgerows and many that remains is mismanaged. By 2007 we had reached our lowest levels yet (that is the most recent analysis, and we can imagine a current one would paint an even bleaker picture) it is vital that we protect the landscape that remains. With an ever-increasing global climate crisis, it is vital that every inch of this landscape that can be preserved, should be. They provide home for pollinators and wildlife. They protect the soil for our crops and defence from storm and flood, they reduce noise, and they create shelter. The loss of this farmland would have a devastating effect on the area around Hatton already prone to flooding, and the building of 4500 homes would make the situation catastrophic. The hamlet of Hatton Station already has flooding issues – with rainfall expected to worsen each year due to global warming this would present serious problems to residents.

Any potential developer on this green-belt farmland would assure us that they would protect established trees, however it is proven that development of the grassland surrounding these would seriously affect the hydrology and threaten the health of the trees.

Lane Farm, Hockley Road, Hatton CV35 7HQ, occupies 120 acres and is primarily a dairy and sheep farm. It has been farmed by the Titterton family for 74 years. It has a dairy herd of 90 grazing cows producing 500,000 litres of milk per annum and is part of the Arla regenerative farming scheme. Furthermore, this farm has been practising regenerative farming for the past 3 years. It produces 56 approx. 40 young beef cattle p/a which are then sold at market for breeding and meat. They have a herd of sheep producing 56 approx. 200 lambs per annum.

The farm is achieving just above net zero and the sheep farming is below net zero. Retaining these types of farms is vital in securing food security for a growing population. In a global climate crisis, we need to focus on as much home production as possible. Reliance on imports leaves us vulnerable and a concerted effort needs to be made nationally to ensure we retain our valuable farmland. Farming does not just produce the food we eat; it is also central to efforts to tackle the nature, climate, and public health crisis.

Hatton Estate is laid mainly to arable, and they produce wheat, barley, maize and pumpkin, they also have 57 approx. 150 head of sheep for meat production. The estate has previously received stewardship grants as illustrated on the table below

6m buffer strips on intensive grassland next to a watercourse	0.19	ha
Bat / Bird box	1	number
Enhanced wild bird seed mix plots	12.09	ha
Farm Environment Record (FER)	199.31	ha
Field corner management	1.01	ha
Floristically enhanced grass margin	14.66	ha
Hedgerow management for landscape (on both sides of a hedge)	7861	m
Hedgerow management for landscape (on one side of a hedge)	3063	m
Hedgerow management for landscape and wildlife	2243	m
Management of field corners	5.9	ha
Nectar flower mixture	11.38	ha
Overwintered stubble	5	ha
Over-wintered stubbles	18.15	ha
Restoration of species-rich, semi-natural grassland	1.03	ha
Skylark plots	20	plots
Unharvested, fertiliser-free conservation headland	3	ha
Wild bird seed mixture	10.97	ha

They have now entered into an agreement that falls under the Sustainable Farming Incentive Scheme 2023, which came into effect on the 1st January 2024 and ends on 31st January 2026, this would include the following interactions

- Pollen and nectar flower mix
- 4m to 12m grass buffer strip on arable and horticultural land
- Assess and record hedgerow condition
- Manage hedgerows
- Maintain or establish hedgerow
- Assess soil, test soil organic matter and produce a soil management plan

Agricultural land loss

The loss of agricultural land can be monitored by looking at the UAA (utilised agricultural area) found in the annual government publication Agriculture in the United Kingdom.

According to this report 17.3mha (42.7m acres) in 2020 (71% of UK land) became 17mha (42m acres) in 2022 (70% of UK land) – a loss of 300,000ha (741,000 acres) in a three-year period.

If these losses of UAA continue the UK could potentially lose well over 10% of the UAA in the UK BY 2030. It could be argued that the loss of UAA is likely to accelerate in the next decade as climate change mitigation schemes (such as growing trees for carbon sequestration, BNG and possibly Nutrient Neutrality). The previous Energy Secretary and Net Zero Secretary Claire Coutinho told Parliament that the best Agricultural land must be protected for food security, however the new Secretary Ed Miliband had already approved three new Solar Farms as of 30th August 2024 covering an area of 2,837ha (7,010 acres).

Policymakers must grasp the nettle and admit that all permanent or long-term losses of good quality agricultural land will have a negative impact on future strategic food supplies.

Land grades 1, 2, 3a plus 3b should all be protected from development.

8. Ecology

Introduction

The Hatton Proposal intends the transformation of an area of Green Belt, currently in preponderantly agricultural use, to residential use. The ecological consequence and the availability of information, in relation to ecology are material considerations in determining whether an allocation for the Hatton Proposal is acceptable *per se*. The ability of the Hatton Proposal to deliver compensatory habitat or *Biodiversity Net Gain* (BNG) is also important in terms of understanding whether the Proposal is viable at all.

The position would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.

Habitats:

The proposed site covers a large area of Ancient Arden. Though predominantly arable in nature, the site includes areas of grassland, rush pasture, ponds, blocks of semi-natural woodland, traditional orchard, and an extensive network of native hedgerows and mature oaks.

Further important wildlife areas are the tributaries of the River Alne and River Avon, which run through the site and the Grand Union Canal.

There are 3 designated Local Wildlife Sites with the boundary of the development, The River Avon and its Tributaries, The River Alne and its Tributaries and The Grand Union Canal West. There are five further potential Local Wildlife Sites. None of these Local Wildlife Sites have been assessed to ascertain their value at a county level.

It should be noted that many of the habitats present across the site are target habitats under Warwick District Councils Biodiversity Action Plan.

The loss of these features would be a material adverse consequence of developing the Proposal. Even if such sites could themselves be protected, the change in the surrounding and supporting environment and the presence of thousands of residents would undoubtedly impair their functionality.

Species:

This mosaic of habitat features, described above, not only provides important sources of food and shelter for wildlife, but it also provides a vital connective corridor across the landscape. A number of particularly important species are known to be present including protected species.

In terms of farmland birds, Skylarks (*Alauda arvensis*) are present which are a UK red listed bird, now globally threatened and a target species under Warwick District Council's Biodiversity Action Plan. If such birds are disturbed, it would be necessary to secure compensatory offsite habitat, enhancing pressure on other supporting habitats. Parts of the land intended for the Hatton Proposal have already been used for Skylark habitat.

Evidence from spraint demonstrates that Otters (*Lutra lutra*) occur along this section of the Grand Union Canal, another target species under Warwick District Council's

Biodiversity Action Plan. The introduction of a substantial residential development in this area would affect their ability to commute and move between areas.

Both Grass Snakes (*Natrix natrix*) and Slow worms (*Anguis fragilis*) are present, having been successfully translocated by Warwickshire County Councils Ecology team on the adjoining land and again both species another target species under Warwick District Councils Biodiversity Action Plan.

Bats are abundant in the area, which given the network of hedgerows and trees and the linear well wooded corridor of the Grand Union Canal is to be expected again another target species under Warwick District Councils Biodiversity Action Plan.

Biodiversity Net Gain/Offsetting

The scale of the proposed development is so large for the site that it is going to be difficult to provide net gain using the hierarchy, which requires BNG to be provided on site where possible and only afterwards the contemplation of offsite or credit-related provision. In respect of the latter, the availability of sufficient credit must be in doubt.

Given the scale of the Hatton Proposal and wider Proposed New Settlement B1/SG07 and the residential nature of the scheme as well as the increase of problems such as pet predation, the council may well need to seek a biodiversity net gain of 20%, in order to help meet their aims under their Biodiversity Action Plan. This figure has been taken up by other Local Authorities. Even if that figure is not pursued, a figure of 10% biodiversity net gain should be assumed as a minimum.

Ecological issues with Proposal

The illustrative plans submitted in support of the Hatton Proposal currently show small, shred-like corridors to be created, with water features. Although these plans might suit smaller species such as pollinators, they would not be sufficient, or be suitable, for wildlife such as Skylarks (*Alauda arvensis*), Grass Snakes (*Natrix natrix*), Slow Worms (*Anguis fragilis*). Much of the wildlife species would find the area unviable – Skylarks (*Alauda arvensis*) for example, require a very open habitat and the planned merging of providing leisure and transport opportunities throughout the Hatton Proposal by providing green shreds which also accommodate wildlife will mean a loss in the diversity of species, with only those that are able to live amongst residential areas surviving.

The government commissioned Lawton report¹ concluded that to reverse the decline in biodiversity habitats must be bigger, better and more joined up. As a result of that report the idea of connectivity between sites; should be an important part of assessing planning applications.

As a result of the Lawton Report authorities are all producing Local Nature Recovery Strategies, including mapping of ecological network throughout the County, which should feed into this analysis.

1

<https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

The light pollution caused from the additional housing and planned leisure areas, will have a negative effect on species such as bats. Where development would face the Canal, this would be particularly problematic, suggesting that ecological considerations in this area militate against focussing development on the Grand Union Canal – indeed, development should be kept away from this ecological artery as much as possible, with otter (*Lutra lutra*) presence also meaning that this must not become a location for urbanisation.

The changes in drainage and hydrology will affect some of the current habitats and some of the species such as trees will suffer as a result. This may affect veteran trees even if they can be retained.

These issues must be addressed *in addition* to securing BNG and make its delivery more problematic. The Green Belt character of this location is highly contributory to the richness described in this chapter of the report.

Wildlife Enhancements

The land that is the subject of the Hatton Proposal has been under government schemes in order to improve and create habitats for wildlife including restoration of grasslands, creating Skylark plots, providing buffer strips, wild bird seed mix plots and nectar rich habitats. Last year it was also entered into a Sustainable Farming Incentive Scheme to receive more funding in order to continue this work. Plainly it has a biodiversity function, which is accepted by the promoters of the Proposal.





The area is promoted for its wildlife value and currently provides opportunities for the public to experience nature, which is especially important for people who do not have access to nature where they live. The Hatton Proposal would frustrate government investment and policy seeking to increase biodiversity and hamper access to such resources.

Conclusions

The potential area of land intended to be subject to the Hatton Proposal is host to a mosaic of habitats and particularly important species. The disruption caused by the Hatton Proposal would be likely to exceed its immediate area and species that dwell in or move through it.

It has previously been under the government funded Environmental Stewardship designed to deliver benefits for wildlife conservation, maintenance and enhancement of landscape quality and character, natural resource protection, protection of the historic environment, promotion of public access and understanding of the countryside. This has resulted in its character being beneficially improved.

Given the land put forward for the Hatton Proposal has previously been invested in to provide environmental and biodiversity benefits, it presents the perfect opportunity for the site to follow in the footsteps of some of the other large estate in the area, such as Packington and Alscot and be put forward for as a biodiversity offsetting provider, which the Council will undoubtedly require moving forward when it secures other, more appropriate land for housing provision in its area.

We would refer you to the recent analysis of the SWLP Preferred Sites Proposal, submitted by Warwickshire Wildlife Trust.

(<https://www.warwickshirewildlifetrust.org.uk/south-warwickshire-local-plan>)

We fully endorse their detailed comments on Policy Direction and the Plan which can be readily applied to site B1/SG07.

10. Health

Introduction

When looking at placing 4500 households in a new settlement as envisaged by the Hatton Proposal (8,000 in the wider Proposed New Settlement B1/SG07), consideration of the infrastructure surrounding their needs is critical. One of those is for access to and provision of health services:

- Primary Care
- Social Services
- Adult Health Care including care homes
- Child Health Care
- Screening services, cancer, diabetes, heart health, liver health etc
- Hospital services including A&E
- Dental Health Care

Consideration should also be given to accessibility and transport infrastructure to get people to and from the services and the accessibility of that especially for those with disabilities.

The Hatton Proposal envisages health care facilities within the site including a new GP Surgery and dental practice. However, both would be private businesses potentially providing NHS services, particularly the dentist surgery. There would need to be established demand before a business is likely to open and as this is a phased development it is unlikely in the first part of development still putting pressure on existing services in the area. Incremental provision is possible, but physical provision in terms of buildings would be required at a sufficiently early stage.

In responding to other planning permissions sought South Warwickshire Health Trust have not supported the developments as it increases pressure on an already overstretched and underfunded range of services including the main local A&E facility in Warwick. There is no reason to assume that the Trust would be able to cope with let alone support the Hatton Proposal if it was delivered.

Existing GP services for the area²

The MEDIAN patients per practice in the UK is 8,830 patients registered. Locally to the Proposal the number of patients registered is:

Location	Number of patients
Chase Meadow Medical Centre	6,989
Claverdon Trinity Medical Centre (Satellite of the Stratford Surgery)	Independent figures not available
Budbrooke Medical Centre	6,241
Priory Medical Centre, Warwick	19,034
Lapworth	3,010

² All data taken from Digital NHS website standard reports

For 4500 homes with 2 people would generate 9000 patients and with a nuclear family of 2 Adults and 2 children as an average this would generate 18000 patients in addition to those already registered from the area. This is equivalent to the size of the largest surgery in the surrounding area at Priory Medical Centre in Warwick. Plainly, failure to make such provision would overwhelm all the local surgeries were they used. (This position would be exacerbated by the development of the wider Proposed New Settlement B1/SG07.)

A new surgery would require a surgery around the same size as Priory Medical centre in the centre of Warwick representing an expense in terms of healthcare provision which may approach £10 million with all the necessary staffing required, and the addition of the journeys required for both staff and patients to be added to the traffic flows. The Hatton Proposal acknowledges a surgery for 15,000 so the costs would be similar or greater given the rises in building costs over the last few years.

As the Hatton Proposal would be planned to be built over a number of years, consideration also needs to be given to the point at which the practice is built and the stress this would put on other local facilities. Whilst these are NHS services, they are provided by GP Surgeries which are private businesses which further complicates certainty as to delivery. Consideration also needs to be given to other healthcare services such as screening, blood testing, health visitors, midwives, district nursing, cancer services, care homes, at home care and so on. All of which in Warwickshire are under pressure currently.

Workforce planning for GP Surgeries

There are many news articles indicating it is more and more difficult to recruit and retain GPs and for the West Midlands area there were 219 vacancies in the category medical and Dental at March 2024 (NHS Vacancy Statistics April 2015 to Mar 2024- Experimental Statistics). This suggests that there is pressure on provision of healthcare professionals and whilst physical infrastructure can be provided there is material uncertainty as to confidence in delivery of services themselves.

Dental Surgeries

Again, dental care is provided by private businesses and locally there is a shortage of spaces both private and definitely NHS. This would impact particularly on children as all children should receive NHS dental care.

This poses the same issue as GP surgery provision in that the timing of when it will be built and staffed must be in considerable doubt. A certain level of business would have to be present for the surgery to open although other local needs might be met by such a facility. However, even assuming the availability of dentistry professionals, this would result in the crowding out of the Proposal's needs themselves. If the

provision would be made belatedly, there would be increased pressure on other local services, in this case in Stratford and Warwick.

Hospital Provision (with A&E)

The availability of capacity in the healthcare system for accident and emergency services relies on:

- Warwick Hospital
- Stratford Upon Avon
- University College Hospital, Coventry
- George Elliot Hospital, Rugby
- Queen Elizabeth Hospital Birmingham

Coventry and Birmingham provide very specialist hospital and A&E Care and would, for example, be used in the case of using helicopters for transport, so severe risk to life etc.

For any development there is a requirement for 15 Minute A&E Access. In respect of the Proposal, even Warwick is outside this isochrone and there are no current plans for further A&E services to be built or developed in the strategic plans.

Further Issues

Access for Emergency Vehicles

If the local road infrastructure is maintained and not improved Ambulance access could be restricted. Many of the local roads are single or “just” dual roads (no central marking) and with an increased use of both the roads (number of other vehicles) and the services with the increased population this could be an issue

Statement regarding Accessibility and the Equality Act 2010

Living near Hatton Station poses significant accessibility challenges for individuals with, especially, physical disabilities. The station's limited support infrastructure, including the absence of lifts and the presence of numerous steep steps between platforms, makes it nearly impossible for those with mobility impairments to navigate. The situation is further exacerbated by the surrounding area's lack of pavements and steep kerbs, which create additional obstacles for wheelchair users and those with limited mobility.

The accessibility issues at Hatton Station are not just a matter of inconvenience; they raise serious concerns regarding compliance with the Equality Act 2010. This Act mandates that public facilities, including transport hubs like railway stations, must be accessible to all individuals, regardless of disability. Hatton Station has recently taken delivery of a ramp which enables access to Up trains towards Leamington only. The absence of lifts, the prevalence of steep steps, and the lack of safe pavements around Hatton Station are clear violations of these legal requirements established in the Equality Act.

Such barriers not only discriminate against disabled individuals but also highlight the station's failure to provide equal access as required by law. Addressing these issues

is not only a legal obligation but a moral imperative to ensure that all members of the community have fair and equal access to public services and transportation.

11. Education

Introduction

Warwickshire County Council's current planning document is the Education Sufficiency Strategy, 2024-2029. This is updated once a year; the most recent update was produced in November 2023.

This notes the significant growth already experienced (20,000 primary and secondary places created over the last 15 years) and a further 10,000 places to come over the next 15 years, assuming all strategic housing is delivered under the current local plans.

The provision of housing on the scale indicated in the Proposed New Settlement B1/SG07 would exacerbate existing pressures on the provision of education in Warwick District and beyond.

How many children would 8,000+ houses generate?

Reference was made to the South Warwickshire Local Plan Strategic Transport and Education Assessment of New Settlement Options.

This gave potential pupil numbers across Proposed New Settlement B1 as:

6,000 new dwellings			8,000 new dwellings			10,000 new dwellings		
Phase	Yield	Forms of entry	Phase	Yield	Forms of entry	Phase	Yield	Forms of entry
Early Years	350		Early Years	467		Early Years	584	
Primary	1752	8 to 9	Primary	2336	11 to 12	Primary	2920	14
Secondary	1251	8 to 9	Secondary	1669	11 to 12	Secondary	2086	14
Post 16	250		Post 16	334		Post 16	417	
Primary SEND	36		Primary SEND	96		Primary SEND	60	
Secondary & Post 16 SEND	36		Secondary & Post 16 SEND	96		Secondary & Post 16 SEND	60	

Taking the middle value of 8,000 homes, 4,806 mainstream places and 192 SEND places would need to be found, requiring the provision of:

- 2 new secondary schools
- 4-6 primary schools

What happens until on-site provision becomes available?

As noted elsewhere in this Report, the early provision of infrastructure tends to front-load development costs but is necessary in order to ensure delivery of key facilities.

There are a great many early burdens on the proposal at B1, which might not be required in other locations.

Pending delivery of on-site provision, the options are:

- Take up existing spare places.
- Create temporary additional capacity.

Each of these approaches has tensions which need to be understood in the context of baseline provision.

Primary

Warwickshire as a whole is forecast to have a 1% decrease in total Primary pupils between 2023 and 2027, when only currently approved housing is taken into account. An underlying reduction in population from NHS data (of around 10%) is largely offset by the impact of new housing across the county.

The primary schools closest to the development are all small (one-form or half-form entry) and rural in nature. The table below sets out the most recent capacity data. Although this table suggests a relatively large *percentage* of free places at present, this does not equate to a large *number* of free places. Furthermore, the number of free places is spread across seven year groups. There is no guarantee that places will be in the right year groups:

School	Capacity	Number on Roll	Percentage of free places	Number of free places across all 7 year groups	Average number per year group
The Ferncumbe C of E Primary School	210	187	11%	23	3
Budbrooke Primary School	210	201	4%	9	1
Claverdon Primary School	210	190	9.5%	20	3
Wolverton Primary Schol	105	75	28.5%	30	4

Source: most recent number on roll data December 2024, and January 2025 – Gov.uk website, Get Information About Schools

Once spare capacity is taken up, how could spare capacity be created? This is particularly acute in the primary sector where there is a 30-pupil limit in Reception and KS1.

The South Warwickshire Local Plan Strategic Transport and Education Assessment of New Settlement Options report states that there is some possibility of expanding Budbrooke to two-form entry but, as can be seen above, the school is nearing

capacity and will possibly reach capacity once Union View is completed. Union View is also likely to put The Ferncumbe under pressure.

A further pressure on local schools in the shorter term is the smaller sites surrounding Hampton Magna. Any building on Proposed New Settlement B1 would be unlikely to start until around 2037 but smaller sites could begin within the next couple of years.

The Ferncumbe and the other schools mentioned above are all on very constrained sites.

Conclusion:

By the time construction at Proposed New Settlement B1 begins, there is a strong possibility that there will be no capacity in local primary schools due to other smaller developments, despite the general downwards trend in primary pupil numbers.

Secondary and Post 16

Over the period 2023-2029, all areas other than North Warwickshire are expected to experience growth of between 8% and 15% due to inward migration. An underlying reduction in population from NHS data (of around -9%) is more than offset by the impact of new housing.

In the most recent Annual Update, it was anticipated that secondary schools would have to begin taking pupils over capacity from 2023.

This is the most recent data on pupil numbers:

School	Capacity	Number on Roll	Percentage of free places	Number of free places across all year groups
Aylesford*	1,399	1,282	8.4%	117
Henley	645	699	-8.4%	-54
Myton	1,702	1,758	-3.3%	-56

Source: most recent number on roll data January and February 2025. Gov.uk website, Get Information About Schools

**Aylesford is now an all through school; this data relates to both primary and secondary.*

The two nearest grammar schools are also already significantly over capacity.

As with local primary schools, there is a small amount of capacity at Aylesford which is likely to be taken up by Union View and other small sites around Hampton Magna if they receive planning permission.

It should be noted that Henley has no sixth form.

Henley is the only school identified as having capacity to expand. However, a further complication regarding secondary education is that councils have no powers to direct academies to expand. All eighteen schools that provide secondary education in the SWLP area are academies.

Conclusion:

Local secondary schools are already under significant pressure. By the time construction starts at Proposed New Settlement B1, the tiny amount of capacity which currently exists is likely to have been absorbed by smaller developments.

SEND

There is insufficient capacity to meet current demand. Demand is generally rising.

Transport Costs

Particularly in the case of primary places, the fact that available places will be scattered across a number of schools has implications for transport.

A similar situation arises for secondary schools although available places would not be so dispersed. The SWLP Infrastructure Delivery Plan Part 1 at 4.2.3 is quite clear that developer contributions may be requested towards home to school transport costs for pupils travelling further than the statutory walking distance or where the walking distance may not be safe.

Walking distance is defined as:

- 2 miles **safe** walking route for early years and primary age children
- 3 miles **safe** walking route for secondary age pupils

Until schools were available on site, virtually all pupils would have to be transported away from Proposed New Settlement B1 at the developers' expense because spare capacity would only be available beyond these limits.

Only The Ferncumbe is feasibly within **safe** walking distance of a tiny part of Proposed New Settlement B1 (the area around Hatton Green).

Thus, developers would need to fund transport for most pupils although parents would probably opt to transport their children by car, adding to road congestion.

It should be further pointed out that this would be a very longstanding arrangement. When new schools open, it is generally only one year group at a time. Pupils outside those year groups would continue to be transported off site.

Even when a pupil's particular year group becomes available, parents may opt to keep their child at the off-site school rather than disrupt their education.

Conclusion:

Transport to off-site locations would be required for virtually every pupil. It would form a significant cost to the developers and be long-term.

New schools in Warwickshire

There are a number of new schools about to open or already planned. In addition, there are a number of planned expansions. These are set out in the SWLP Infrastructure Delivery Plan Part 1.

It is notable that Proposed New Settlement B1 is not within easy reach of any of them. They are overwhelmingly located to the south of Warwick and Leamington, and in Kenilworth.

Conclusion

A development at Proposed New Settlement B1 is in the wrong place. Further housing development, such as at X2, would be much more appropriate as the educational provision either exists or plans are well-advanced.

Costs for the Developers

These are set out in the **Developers' Guide to Contributions for Education and Early Years Provision, Warwickshire County Council, December 2023 (Appendix A)**

Temporary additional places

Once any free places available at local schools were filled, the developers would be expected to fund extra capacity at existing schools. It is impossible to gauge the cost of creating additional **temporary** places; there does not appear to be a set cost for these compared to the provision of **permanent** extra places (around £23,000 per pupil for mainstream schools). The guidance merely states that the cost per pupil is likely to be less.

Capital cost of new provision

These are currently around £30,000 per pupil for mainstream places and £91,000 for SEND places.

Revenue cost of new provision

These are estimated at around £2,500 per primary pupil and £1,200 per secondary pupil to offset pre- and post-opening grants provided by Warwickshire County Council. These grants help to meet the full costs of the provision whilst pupil numbers are low.

Phasing of provision

A further complication now that Proposed New Settlement B1 expands beyond the original Hatton Proposal is the need to deal with multiple landowners and

developers. How will costs be apportioned and what guarantee is there that this would not lead to delays?

Conclusion:

Whilst no firm conclusion on costs can yet be drawn, it is apparent that this has the capacity to run onto many tens of millions and would include:

- Temporary additional places at existing schools.
- Capital and revenue costs of new provision
- Transport

Appendix A

Expansion of Existing Provision

The per pupil amounts that Warwickshire County Council will require as developer contributions towards the cost of providing additional permanent school places in an existing school are:

Primary (per place)	Secondary (per place)	Early Years (per place)	Post 16 (per place)	SEN Primary (per place)	SEN Secondary (per place)
£22,787	£22,536	£22,787	£22,536	£90,653	£90,653

The costs **could** be lower if only temporary expansion is required which is likely to be the case here.

New Provision

Capital Cost

Primary (per place)	Secondary (per place)	Early Years (per place)	Post 16 (per place)	SEN Primary (per place)	SEN Secondary (per place)
£29,674	£31,587	£29,674	£31,587	£90,653	£90,653

Revenue Cost

Primary: pre-opening grant (£195,000) + maximum post-opening grant (£335,500) = £530,500 which equates to a per pupil cost of £2,526.

Secondary: pre-opening grant (£275,000) + maximum post-opening grant (£762,000) = £1,037,000 which equates to a per pupil cost of £1,152

Source: Developers’ Guide to Contributions for Education and Early Years Provision, December 2023, Warwickshire County Council

12. Conclusions:

We have demonstrated in the body of this report

- The Green Belt assessment has not properly addressed the Green Belt likely to be affected by a Proposed New Settlement B1/SG07.
- The Sustainability Assessment is flawed in a number of key respects, meaning that it is not appropriate properly to rely upon it.
- There is only very limited scope for development at Hatton Station and therefore this would not make it sustainable in the long term.
- Significant road infrastructure improvements could be compromised due to the very high costs to be met by developers, local and national Governments.
- Due to infrastructure constraints regarding roads and the canal towpath to promote sites Proposed New Settlement B1/SG07 as safe travel corridors would be irresponsible. Significant investment would be required to ameliorate some of these problems, which in turn would have a negative impact on the rural landscape.
- Ancient Arden covers the Western part of Proposed New Settlement B1 and is quite unsuitable for housing development. Particularly, it should be protected as a landscape of ancient historical interest.
- As the SWLP Preferred Sites document has been largely a desktop exercise, it has been found that many observations and conclusions are inaccurate. We have referred to many such examples throughout our report where local knowledge based on actual experiences in our communities reflects such misconceptions. We trust our observations in the field will help the next iteration of the SWLP to be more accurate in its detail and therefore the joint committee will be able to reach more informed and deliverable decisions.

“Countryside is a unique and popular national resource. It is disappearing daily, and none is being made afresh”

Simon Jenkins

13. Appendices

Hatton Station Train Data

Time	Platform	Departure Station	End Station	Company	Passenger On	Passenger Off
05:56	2	LMS	WOS	LM	1	0
06:38	2	BCS	BMO	CH	3	0
06:53	3	SAV	LMS	CH	3	1
07:11	2	LMS	BMO	CH	5	0
07:41	2	MYB	BSW	CH	9	0
07:44	1	BMO	LMS	CH	1	2
07:51	3	LMS	SAV	CH	2	0
08:16	2	LMS	BMO	CH	5	1
08:51	3	SAV	LMS	CH	0	0
09:44	1	BMO	LMS	CH	0	2
09:51	3	LMS	SAV	CH	2	3
10:16	2	LMS	BMO	CH	1	2
10:51	3	SAV	LMS	CH	3	0
11:39	1	BMO	LMS	CH	2	5
11:51	3	LMS	SAV	CH	1	1
12:16	2	LMS	BMO	CH	2	0
12:51	3	SAV	LMS	CH	0	0
13:39	1	BMO	LMS	CH	0	4
13:51	3	LMS	SAV	CH	4	1
14:16	2	LMS	BSW	CH	0	0
14:53	3	SAV	LMS	CH	0	1
15:39	1	BSW	LMS	CH	0	7
15:52	3	LMS	SAV	CH	1	1
16:16	2	LMS	BMO	CH	3	2
16:55	3	SAV	LMS	CH	0	4
17:05	1	BMO	MYB	CH	2	7
17:44	1	BMO	LMS	CH	1	23
17:51	3	LMS	SAV	CH	13	0
18:19	2	LMS	BMO	CH	2	1
18:51	3	SAV	LMS	CH	0	0
19:26	1	WOS	LMS	LM	0	3
19:39	1	BMO	MYB	CH	0	10
19:51	3	LMS	SAV	CH	9	0
20:14	2	MYB	BSW	CH	0	1
21:03	1	DDG	LMS	LM	-	-

21:44	1	BMO	LMS	CH	0	0
21:53	2	LMS	DDG	LM	-	-
21:55	3	SAV	MYB	CH	0	0
22:18	1	DDG	LMS	LM	-	-
22:38	3	LMS	SAV	CH	1	0
22:44	1	BSW	BAN	CH	0	0
22:44	2	MYB	SBJ	CH	2	0
22:48	2	LMS	BMO	CH	0	0
23:57	1	WOS	LMS	LM	0	0
					78	82