



**KEEP HATTON STATION RURAL (KHSR)**

**INTERIM REPORT**

**OCTOBER 2024**



## **KHSR Interim Report October 2024**

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## **Introduction and Summary**

This interim 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 ("**Proposal**"), identified through the *call for sites* exercise undertaken 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 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.**

**Notably,**

- **The Proposal does not demonstrate "exceptional circumstances" under the current National Planning Policy Framework ("NPPF");**
- **Under the emerging changes to the NPPF, the Proposal is not:**
  - **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.**

*National Planning Policy Framework 2023*

Warwick District Council is the local planning authority for the area of land in which the 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 2023) ("**NPPF 2023**") it is necessary before removing such land from the Green Belt to show that changes are subject to "exceptional circumstances ... fully evidenced and justified."

KHSR understands that the Proposal may be contained in the list of preferred sites presented in early 2025 as prospectively to be included as allocations in the Plan. In terms of the NPPF 2023, KHSR does not believe it is possible to demonstrate and justify exceptional circumstances because any settlement at this location would be

exceptionally difficult to make sustainable in transport and other infrastructure terms as this Report demonstrates.

*Revisions to NPPF 2023*

**Even subject to the amendments to the NPPF on which the Government has consulted, the Proposal is misconceived and should not be included in Warwick District Council's list of preferred sites since its inclusion would not deliver a sound local plan. The 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 proposes to revise the NPPF 2023 in order to enhance the delivery of new housing in particular. Among the changes that the Government has consulted upon are proposals that would make removal of Green Belt designations easier, especially in respect of what it terms *Grey Belt*. Proposals as to how such land is defined are contained in the Government's consultation as updated in September 2024.

This proposed definition 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 any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).*

As the site of the Proposal is not Previously Developed Land, to qualify it would need to "make a limited contribution to the five 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 emerging policy but would point out that the sequential test ought to be applied so that non-Green Belt land is 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.*

Superficially, emerging policy favours the Proposal because it references "land around train [sic] stations". However, this Report demonstrates that it is extremely difficult for the Proposal to be "made more sustainable". This is because the infrastructure required in this location is extensive and highly costly. To be truly sustainable, transport choices would need to be committed as part of the Proposal, but there is little chance of them being delivered. As in other locations in the UK, where extensive infrastructure is needed for delivery of a major site, the allocation would simply fail to deliver its projected housing development. This is so obviously likely to occur in respect of the Proposal that its inclusion in the Plan would jeopardise its soundness. Hence, the Proposal should not be included in Warwick District Council's list of preferred sites.

#### *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 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 Proposal would be reliant on heavy and expensive infrastructure to make the land of the 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 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 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 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 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 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 of 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.

KHSR urges that the Proposal -or any variant making provision for an allocation of land at or near to Hatton Station - should not be included in the list of preferred sites.

**Keep Hatton Station Rural**

**October 2024**

## **1. Transport – Rail**

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.

### **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 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 4,500 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 12,000 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
- The access culvert beneath the main line at the western end of the proposed settlement.

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.

## **2. 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 Proposal. 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.

The location affected by the Proposal is not well served by the existing highway infrastructure. The Proposal 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 in the Proposal Area. These constraints make the delivery of the Proposal 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**

The Proposal affects land which 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, which runs past the Proposal site in a cutting.

The Birmingham Road (A4177) is the main transport artery likely to serve the Proposal. 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 the Proposal 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 Proposal 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 the site of the Proposal is highly constrained in terms of highway infrastructure –

- The Proposal 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 the Proposal**

As set out immediately above, the site of the Proposal 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 three existing routes to Hatton Railway Station, requiring use of Dark Lane and Station Road, or the use of a public footpath via a culvert shared with a watercourse beneath the railway line. The use of the railway station for sustainable transport purposes is itself materially hindered by these accessibility issues.

The proposed new access road to the development, 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 Curlieu 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.

### **Conclusion**

As for other infrastructure the implementation of the Proposal in this location is particularly problematic. The offsite highway network would require substantial upgrades to accommodate the Proposal. 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 development, which affects viability and deliverability.

### **3. Other Infrastructure**

#### **Introduction**

The proposal 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 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 Proposal (running out to 2050) it is assumed that gas will not be used in those properties. Therefore, for the 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 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 Proposal of 4,500 residences **between 54 and 72 MVA** (even without considering the demand for commercial and public buildings, any local manufacturing etc).

### **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:

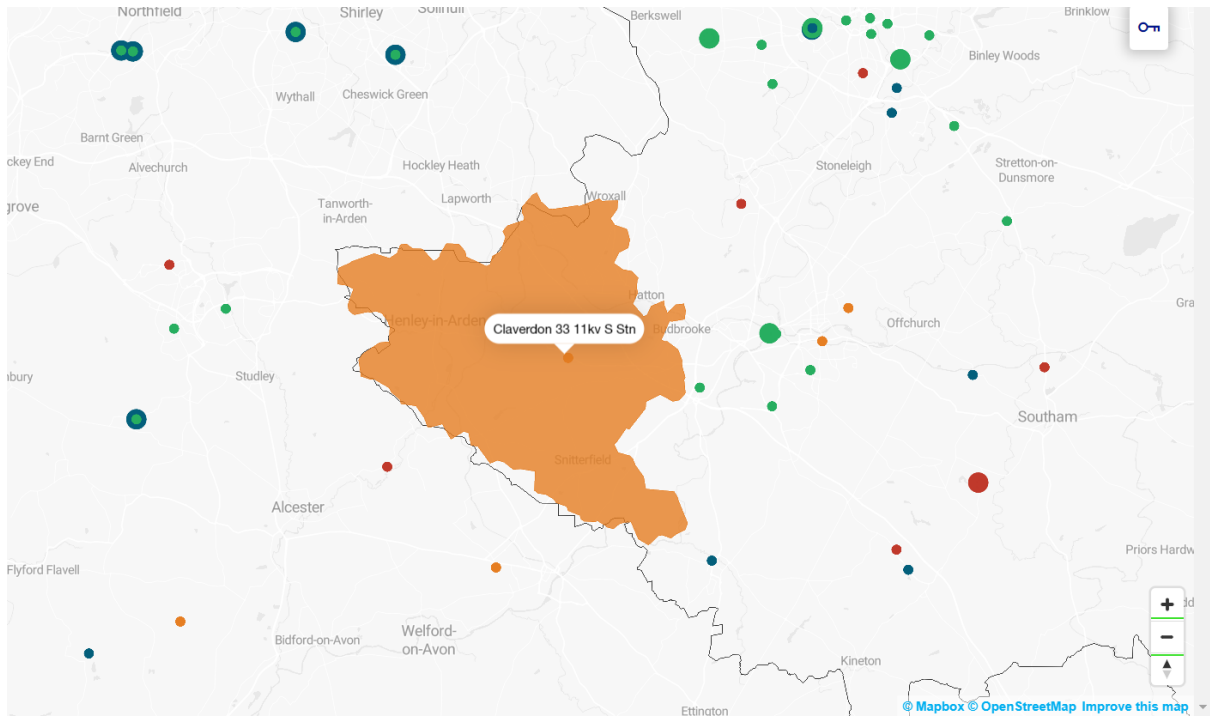
<https://openinframap.org/#12.38/52.28206/-1.63154>

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.

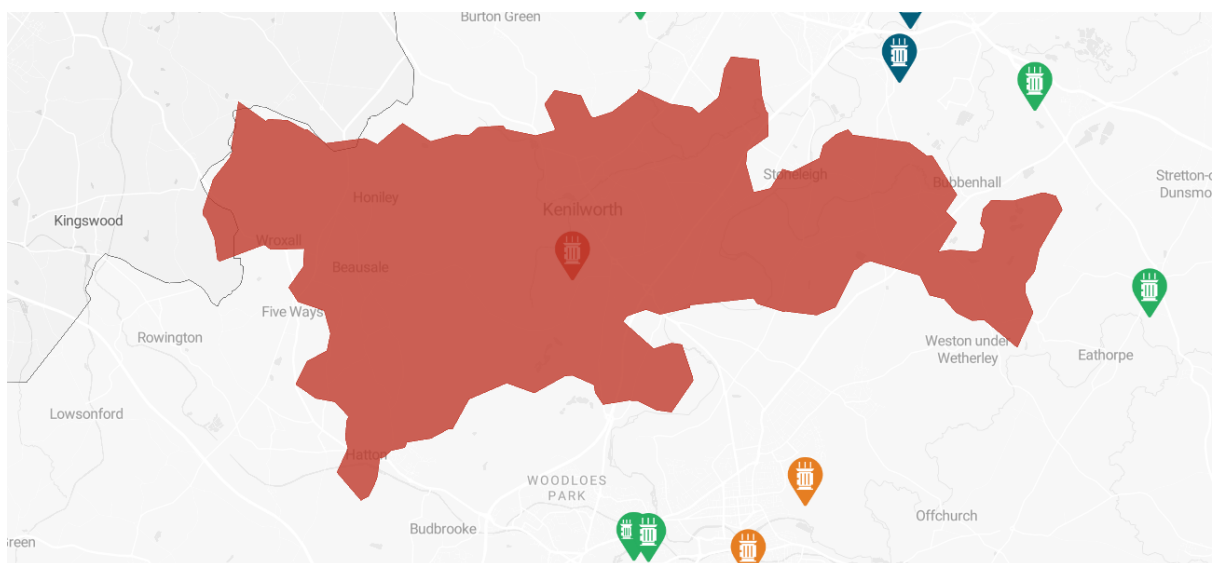
The area for which electricity is supplied via the Claverdon substation is shown on the NGED website:



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, 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 Proposal 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 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 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 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 Proposal.

Whilst the available capacity is not known, again it must be assumed that these works could not be provided incrementally.

### **Sewerage**

The area of the proposal is not well served by mains sewerage with many residences reliant on septic tanks on the peripheries of the land contained in the 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 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 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.

### **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 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.

## **4. Ecology**

### **Introduction**

The 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 Proposal is acceptable *per se*.

The ability of the Proposal to deliver compensatory habitat or *Biodiversity Net Gain* (BNG) is also important in terms of understanding whether the Proposal is viable at all.

### **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 Councils 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 Proposal have 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 project 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 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 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 report<sup>1</sup> 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.

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



The light pollution caused from all 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 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 proposed development 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 Proposal is host to a mosaic of habitats and particularly important species. The disruption caused by the 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 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.

## 5. Health

### **Introduction**

When looking at placing 4500 households in a new settlement as envisaged by the Proposal, 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 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 Proposal if it was delivered.

### **Existing GP services for the area<sup>2</sup>**

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

<b>Location</b>	<b>Number of patients</b>
Chase Meadow Medical Centre	6,989
Claverdon Trinity Medical Centre (Satellite of the Stratford Surgery)	Independent figures not available
Budbrooke Medical Centre	6,241

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<sup>2</sup> All data taken from Digital NHS website standard reports

Priory Medical Centre, Warwick	19,034
Lapworth	3,010
Henley in Arden	6,633

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.

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 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 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.

## 6. 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 comprised in the Proposal would exacerbate existing pressures on the provision of education in Warwick District and beyond.

### How many children would 4,500 houses generate?

In order to appreciate the impact on education provision it is necessary to understand the magnitude of change. A standard formula has been used to calculate the number of children that this is likely to generate.

The calculations are at **Appendix A**. These show that:

- Each 1000 houses would need 601 places from Early Years through to Post 16.
- Each 1000 houses would need 25 SEND places.
- 4,500 houses in total would need 2,703 places from Early Years through to Post 16.
- 4,500 houses in total would need 111 SEND places.

### How many schools are needed for 4,500 houses?

Based upon this provision, the promoters of the Proposal at Hatton Station have stated that they would create an on-site secondary school and two primary schools within its bounds.

However, by the time all 4,500 houses were built, the minimum requirement for the estimated 1,314 primary-aged pupils would be:

- 3 two-form entry primary schools (3 x 420 = 1,260 places)
- 2 three-form entry primary schools (2 x 630 = 1,260 places)

These schools would be required to have on-site nurseries. Any provision not accommodated on the site of the Proposal would have to be met elsewhere and would increase pressure on existing schools.,

One secondary school would be sufficient for the estimated number of pupils.

## Conclusion:

- **The number of schools proposed by the developer would be sufficient, provided that the two primary schools were three-form entry.**

## 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, which might not be required in other locations. Pending delivery of onsite provision, the options are:

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

Either 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 schools closest to the Proposal are all small (one-form entry) and rural in nature. Thus, although the tables at **Appendix B** suggest a relatively large *percentage* of free places in the coming years, this does not equate to a large *number* of free places. For example, in the latest year for which there is a forecast, the two Warwick Rural schools would have 28% spare capacity in Reception, but this still only amounts to 17 places.

Once spare places are taken up, how could extra capacity be created, especially with a 30-pupil limit in Reception and KS1 classes? Local schools are on limited sites; creating a two-form entry school out of a one-form entry school would be challenging.

### *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.



The closest secondary schools are Aylesford (some capacity currently), Myton (currently significantly over capacity) and Henley (also currently over capacity). The two nearest grammar schools are also already significantly over capacity.

### *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 small schools has implications for transport.

A similar situation arises for secondary schools although available places would not be so dispersed.

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

Only The Ferncumbe is feasibly within walking distance but walking along unlit, narrow lanes where there is no footway is unlikely to be classified as safe.

Hence, the Proposal would need to fund transport because there are no current schools within a **safe** walking distance.

### *For how long would temporary places be needed?*

The promoters of the Proposal have not stated when would begin building on-site provision. However, the limited number of places likely to be available locally, and the difficulties in creating extra places, would suggest that early delivery of on-site provision is vital.

### *Conclusion:*

- Local primary schools may have some spaces in the future, but these places are small in number and will be scattered across a number of small schools.
- Local secondary schools are currently under significant pressure.
- There are currently insufficient places for SEND pupils.
- Transport would have to be funded by the developer because there are no schools within a “safe” walking distance.
- *Early* on-site provision would be needed.

## **New schools in Warwickshire**

There are a number of new schools about to open or already planned. However, they are focused on Nuneaton, Rugby and the area south of Leamington towards Bishops Tachbrook because this is where current housing allocations are situated. There are no expansions planned in local schools. Hence, it can be concluded that new Warwickshire schools are not in the right location for this development.

## **Costs for the Development to meet**

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

### *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.

## **Conclusion in relation to costs**

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

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

## Calculation of the Places Required

### Mainstream

Number of houses	Divided by 100 Multiplied by 4.17	Early Years Multiply by 1.4	Primary Multiply by 7	Secondary Multiply by 5	Post 16 Multiply by 1	Total
1000	41.7	58	292	209	42	601
2000	83.4	117	584	417	83	1201
3000	125.1	175	876	626	125	1802
4000	166.8	233	1168	834	167	2402
4500	187.65	263	1314	938	188	2703

### SEND

Number of houses	Divided by 100 Multiplied by 0.17	Early Years Multiply by 1.4	Primary Multiply by 7	Secondary Multiply by 5	Post 16 Multiply by 1	Total
1000	1.7	2	12	9	2	25
2000	3.4	5	24	17	3	49
3000	5.1	7	36	26	5	74
4000	6.8	10	48	34	7	99
4500	7.65	11	54	38	8	111

This is calculated as:

*(Number of dwellings/100) x pupil yield per 100 dwellings x number of equivalent year groups for the relevant age range.*

Source: **Developers' Guide to Contributions for Education and Early Years Provision**, December 2023.

The pupil yield for Warwick District is 4.17 for pupils in mainstream education and 0.17 SEND pupils. These are provided by the DfE in their **Pupil Yield Data Dashboard**, published August 2023.

## Appendix B

### Warwickshire Education Sufficiency Strategy, 2024 – 2029 Forecast Pupil Numbers, Reception and Year 7

These forecasts are based on the numbers of pupils expected *when only approved housing is taken into account*.

#### **Primary – Warwick Planning Area**

The schools in this area are:

- All Saints' C of E Junior School
- Budbrooke Primary School
- Coten End Primary School
- Emscote Infant School
- Newburgh Primary School
- St Mary Immaculate Catholic Primary School
- Westgate Primary School
- Woodloes Primary School

<b>WARWICK</b>		<b>YR Capacity (PAN)</b>	<b>forecast YR pupils</b>	<b>available YR places</b>	<b>spare YR capacity %</b>
	<b>23/24</b>	380	331	49	13%
	<b>24/25</b>	380	349	31	8%
	<b>25/26</b>	380	286	94	25%
	<b>26/27</b>	380	322	58	15%
	<b>27/28</b>	380	325	55	15%

## **Primary – Warwick Rural Planning Area**

The schools in this area are:

- Lapworth C of E Primary School
- The Ferncumbe C of E Primary School

<b>WARWICK RURAL</b>		<b>YR Capacity (PAN)</b>	<b>forecast YR pupils</b>	<b>available YR places</b>	<b>spare YR capacity %</b>
	<b>23/24</b>	60	50	10	16%
	<b>24/25</b>	60	44	16	26%
	<b>25/26</b>	60	50	10	17%
	<b>26/27</b>	60	35	25	42%
	<b>27/28</b>	60	43	17	28%

## **Secondary**

The schools in the Warwick/Central Warwickshire area are:

- Aylesford School
- Champion School
- Myton School
- North Leamington School
- Trinity Catholic School

<b>WARWICK AND LEAMINGTON (SEC)</b>		<b>Y7 Capacity (PAN)</b>	<b>forecast Y7 pupils</b>	<b>available Y7 places</b>	<b>spare Y7 capacity %</b>
	<b>23/24</b>	1240	1162	78	6%
	<b>24/25</b>	1231	1141	90	7%
	<b>25/26</b>	1231	1118	113	9%
	<b>26/27</b>	1231	1183	48	<b>4%</b>
	<b>27/28</b>	1231	1069	162	13%
	<b>28/29</b>	1231	1130	101	8%
	<b>29/30</b>	1231	1125	106	9%

The school in the Henley area is:

- Henley in Arden

This school is included here because it is commonly attended by children local to Hatton Station. Note that it does not have a sixth form.

HENLEY (SEC)		Y7 Capacity (PAN)	forecast Y7 pupils	available Y7 places	spare Y7 capacity %
	23/24	140	140	0	0%
	24/25	140	140	0	0%
	25/26	140	140	0	0%
	26/27	140	140	0	0%
	27/28	140	140	0	0%
	28/29	140	140	0	0%
	29/30	140	140	0	0%

## Appendix C

### 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**