

# Planning Application

**W/24/0706**

## **Site: Land off Oakdene Crescent, Hatton Station**

### **1. Introduction**

This is a response to the following document:

- **Housing Need Assessment for Shrewley, Warwickshire and the surrounding parishes of Budbrooke, Beausale, Haseley, Honiley and Wroxall, Leek Wootton and Guys Cliffe, Hatton, Norton Lindsey and Rowington by Cotesbury, December, 2023, revised April, 2025**

...making reference to:

- **Response by the Housing Strategy and Enabling Officer, May, 2025**

The intention here is not to provide any further analysis of the data provided as this has been considered at length by the Housing Strategy and Enabling Officer. We would concur with his conclusion that this report is unsound in relation to the calculation of housing need in Shrewley parish.

We are confining our comments to factual inaccuracies, contradictions and highly selective use of quotations from planning policy.

### **2. Is this development infill or a rural exception site?**

**Reference is made to Section 3 of the Cotesbury report.**

#### **2.1 Hatton Station as a Limited Infill Village**

2.1.1 At paragraph 3.3, the author contradicts himself. He quotes from the local plan:

*“...focusing rural housing development in the district’s most sustainable village locations...”*

... and then shows Hatton Station – correctly – as a Limited Infill Village, **NOT** a Growth Village. Hatton Station is **NOT** a Growth Village precisely because it is not a sustainable location. This was considered in detail in our first response to this application.

#### 2.1.2 Paragraph 3.4 of the Cotesbury report

A quotation is taken from the Local Plan with regard to Limited Infill Villages. This is a good example of highly selective quotations being used which do not tell the whole story:

*“Local Plan Para 48 further advises ‘In the case of Limited Infill Villages lying with the Green Belt, the type and scale of development will be more restricted. In line with national green belt policy, appropriate development includes...rural affordable housing’”.*

The author has, however, ignored the definition of Limited Infill Villages. In the Local Plan, at Section H11, on page 78, it states:

#### **H11 Limited Village Infill Housing Development in the Green Belt**

Limited village infill housing development in the green belt will be permitted where the site is located within a Limited Infill Village (as shown on the Policies Map) and the following criteria are satisfied:

- a) the development is for no more than two dwellings;
- b) the development comprises the infilling of a small gap fronting the public highway between an otherwise largely uninterrupted built up frontage, which is visible as part of the street scene; and
- c) the site does not form an important part of the integrity of the village, the loss of which would have a harmful impact upon the local character and distinctiveness of the area.

Note the reference to no more than two dwellings (**NOT** 34) and also the definition of infilling. Hatton Station does not have any sites to infill. The proposed development could not be further removed from this definition as it does **NOT** infill a small gap fronting the public highway and would **NOT** be a visible part of the street scene.

It is puzzling, therefore, that the author has drawn attention to Hatton Station’s status as a Limited Infill Village when this undermines, not strengthens, the case being made for development here.

2.1.3 Paragraph 3.5 appears to repeat paragraph 3.4 (?). The author quotes paragraph 83 of the NPPF:

*“Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

This has been interpreted by the author thus:

*“This indicates that housing need should not be confined to a single parish but can reasonably serve multiple villages, potentially spanning several parish boundaries.”*

...but this is not what the NPPF actually says. The author does not distinguish between a village and a parish and nor does he specify what services would be supported by building at Hatton Station.

An obvious example could be the Ferncumbe School at Hatton Green which is in Hatton Parish. It should be remembered, however, that 150 houses are being built at Union View and the Ferncumbe, which is a tiny one-form entry school, will have to absorb many of the children from this new development. There might not actually be space for extra children from Hatton Station. Budbrooke Primary School, which is at Hampton

Magna, is having to absorb children from Hampton Trove (147 homes), and, increasingly, children from Union View.

The nearest schools do not need extra pupils.

The nearest shop is Shrewley Stores and Post Office in Shrewley. This is a thriving business, much used by the local community. Building at Hatton Station would have a minimal impact on its ongoing success and there is no safe walking or cycling route from Hatton Station.

In general, local settlements are spread over a wide area and there are no safe walking or cycling routes between them which is why Hatton Station is such a car dependent community.

## 2.2 The Development as a Rural Exception Site

2.2.1 At paragraph 4.4, the author quotes **H3: Affordable Homes on Rural Exception Sites** in the current Local Plan. As with the quotation from section H11 on Limited Infill Villages, the author is using this to *promote* the development, when it actually *undermines* his case completely. This is the section from the Local Plan which the author uses:

### H3 Affordable Housing on Rural Exception Sites

The development of affordable housing to meet the local needs of a village or parish may be permitted in locations which would not normally be released for housing, provided that:

- a) the proposal will meet a particular local housing need, as identified in detailed and up to date evidence from a parish or village housing needs assessment, and it can be demonstrated that the need cannot be met in any other way;
- b) the proposed development will be small in scale, of appropriate design and located within, or adjoining, an existing settlement; and
- c) the following principles are established:
  - i. all of the housing provided will only be available (both initially and for subsequent occupancies) to those with a demonstrable housing need and, first and foremost, to those with a need to be housed in the locality;
  - ii. the type of accommodation, in terms of size, type and tenure, to be provided will reflect the needs identified in the housing needs assessment;

He quotes from the above section where it is made plain that housing is to meet “a particular local housing need” as identified in a recent “parish or village housing needs assessment” and yet produces data implying that, far from meeting the needs of people at Hatton Station, our tiny settlement should house people from across a wider geographical area with no proven connection the settlement.

This quotation also states that development should be small in scale. It could be argued that this is open to interpretation but the **Affordable Housing Supplementary Planning Document, July, 2020**, page 29-30, clarifies this:

*“In Warwick District, rural sites tend to accommodate less than 8 dwellings because villages are small in size.”*

A maximum of eight, **NOT** 34. Furthermore, Hatton Station is a particularly tiny settlement of just 112 houses which already has six houses for social rent managed by Orbit Housing. Even eight extra houses would be disproportionate. 34 houses would increase the size of the settlement by 30%.

2.2.2 The author ignores the explanatory text which follows the above extract from **H3: Affordable Homes on Rural Exception Sites:**

**Explanatory Text**

- 4.29 It is widely recognised that there is a need within rural areas to provide affordable housing to meet local needs. This is important to sustain rural economies and allow those working in rural areas, or those with strong family links to rural communities, to live there.

Paragraph 4.32 in the Explanatory Text expands on this point:

- that the prospective occupiers identified in the housing needs assessment can demonstrate a strong local connection as evidenced by birth, long-term residence, employment or family connection (in cases where there is a need to live close to family for support); and

The author states at 21.3 of his report that 22 houses are needed within Shrewley parish. What evidence is there that **any** of these households have a connection to Hatton Station?

Paragraph 4.34 in the Explanatory Text is of particular relevance to Hatton Station:

- 4.34 For the purposes of this policy, a suitable location for rural affordable housing is defined as a settlement having at least one basic service such as a shop, school, place of worship, public house or community facility. Where a proposal is made under this policy in a location that does not have any of these basic facilities, a very strong justification will be required as to why affordable housing is appropriate.

Hatton Station does not have any of these services and no “strong justification” has been put forward.

2.2.3 Reference was also made to the most recent NPPF to investigate whether the rules around Rural Exception Sites have changed. The definition given below is wholly in keeping with the current Local Plan as it makes it clear that the development is to address the needs of the local community:

**Rural exception sites:** Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. **Rural exception sites** seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.

Source: NPPF (December, 2024) Annex 2, Glossary

## Conclusion:

- If this development is regarded as “infill”, it does not satisfy the requirements of the Local Plan.
- If this development is treated as a rural exception site, it does not meet the criteria set out in either the Local Plan or the NPPF.

### 3. Local context, paragraph 7.1 of the Cotesbury report.

Firstly, reference should be made to paragraph 3.1 of the Cotesbury report. This paragraph demonstrates that the author seems to be unaware of where the proposed development is located:

*“The Site is located on land to the rear of Oakdene Crescent, Shrewley.”*

No. The proposed development is at Hatton Station, **NOT** Shrewley.

This confusion then continues at paragraph 7.1:

*“Shrewley is a well-served rural settlement with a primary school (**UNTRUE**), a pub, a church (**UNTRUE**), village hall, village shop and post office, together with facilities for football, cricket and tennis (**UNTRUE**).”*

The proposed development is at Hatton Station, **NOT** Shrewley.

It should be further noted that the whole of Shrewley *Parish*, not just the actual *village* of Shrewley, does not have a school, church or the stated leisure facilities.

For the absolute avoidance of doubt, can we reiterate that Hatton Station does **NOT** have a:

- School,
- Church,
- Pub,
- Village hall,
- Shop,
- Post Office,
- Leisure facilities.

3.2 At paragraph 7.3, a statement is made to effect that the various parishes listed are:

*“well-served with amenities comprising of primary schools, village shops, (with the exception of Prescott), churches, village halls, public houses and range of community clubs.”*

Where is the evidence for this and where is Prescott? It seems likely that this section has been cut and pasted from a different report.

The villages of Beausale, Haseley, Honiley, Wroxall and Rowington, for example, have neither of the two most important services – a school and shop. Public transport in this part of rural Warwickshire is virtually non-existent and **ALL** the communities listed are very car dependent.

## Conclusion

- **These may appear minor points but they demonstrate a lack of basic research. How can the more complex aspects of this report have any credibility when the author appears unsure of the location of the development?**

### **4. Parish Housing Need Surveys, paragraph 9**

4.1 The author has corrected an earlier version of this report where the Shrewley Parish Housing Needs Survey was discounted. The author now acknowledges that there is a reasonably up to date survey, dating from 2022. He also states correctly that this gives housing need for the whole parish as 2 one-bedroom bungalows and 1 one-bedroom flat.

This point has been made in earlier submissions but is reiterated here. On a development of 34 dwellings, why does **NOT ONE** property fulfil the needs of those who have responded to the housing needs survey? It is reasonable to assume that the respondents are seeking a property on one level and yet the planned development consists of 30 houses and four maisonettes. Where are the bungalows?

4.2 The author seeks to undermine the validity of this survey, firstly by commenting on the “low” response rate although the actual survey document refers to a “good” response. A copy of this (independently conducted) survey was distributed to every household in Shrewley Parish and the responses could be made online or using a Freepost envelope. If the response rate was “low”, there is only one sensible conclusion: residents are overwhelmingly satisfied with their housing arrangements.

The author points to the fact that those in social rent and shared ownership did not respond. But why should they? If they have a property which suits their needs, what would be the point? There are six social rent houses in Oakdene Crescent at Hatton Station. They are pleasant, modern houses which are not subject to overcrowding. Why should the occupants of these houses report that they are in need of housing?

4.3 At paragraph 9.1b, the author states:

*“The Survey conclusions simply report the need based on actual responses received and do not seek to factor/data weight the responses to reflect the demographic and tenure profile of the parish which clearly understates the response.”*

Why should the results require any adjustment when 100% of the Parish was surveyed? The only argument for adjusting the figures would be if the survey had been carried out on a sample basis.

**Conclusion:**

- **The author seeks to undermine the validity of the Shrewley Parish Housing Needs Survey. However, the survey covered 100% of households and care was taken to ensure that it was easy to respond online or by post.**
- **Unjustifiable assumptions have been made about households who chose not to respond.**

**Our overall conclusion is that this report does not make a convincing case for building 34 houses at Hatton Station and should be regarded as unsound.**