

Executive Summary

Application No: W24/0706

Registration Date: 11/7/2024

Parish Council: Shrewley

Land off Oakdene Crescent, Hatton Station

Redevelopment of the site and erection of 34 residential dwellings plus site access, parking, landscaping.

The attached report is an **OBJECTION** to the above development.

It will be demonstrated that:

Section 1. The decision to include this site on the brownfield register (entry R77) is incorrect.

Section 2. The development does not conform to the Local Plan.

Section 3. There are other serious issues relating to, inter alia, site contamination, biodiversity loss, sustainability and connectivity.

Section 4. Some of the supporting documents are flawed, particularly the Transport Statement which is fundamentally unsound.

SECTION 1

OBJECTION 1: This is not a brownfield site.

- This site does not conform to the definition of a brownfield site (**Local Plan – glossary**).
- It has been abandoned for at least 50 years.
- There are no visible signs whatsoever of the narrow track which intruded partly into the site.
- It has completely rewilded itself and is a recognised reptile habitat.

SECTION 2

OBJECTION 2: It does not conform to the Local Plan policy H1 New Housing because it is not in a suitable location.

The site does not meet the requirements because:

- It is not in an urban area;
- It is not a growth village;
- Outside the village boundary;
- It is not responding to an identified need;

- It is not a small-scale development in relation to Hatton Station (increases number of houses by about a third);
- It will have a negative impact on the existing community;
- It will have a negative impact on local infrastructure;
- It will have a negative impact on wildlife;
- It is in an area of important landscape value and high sensitivity to residential development.

OBJECTION 3: It does not conform to Local Plan Policy H2 Affordable Housing because it will not produce a truly integrated community.

- The affordable houses would be concentrated in one area, outside the recognised village boundary, and down a narrow access road.
- The houses would be markedly different from other houses in the settlement in size, density and character, i.e. it would be obvious that they were affordable houses.

OBJECTION 4: It does not conform to Local Plan Policy H3 (a) Affordable Housing in Rural Exception Sites because the developers have no evidence that this settlement at Hatton Station requires 34 houses to meet housing need.

Reference was made to the **Affordable Housing SPD**, July, 2020. This makes it quite clear that there is no reason for Hatton Station to absorb housing need from outside Hatton Station.

- The Housing Needs Assessment produced by Cotesbury on behalf of the developers can be disregarded as it refers to housing need far beyond Hatton Station and ignores the most recent (and relevant) Housing Needs Survey (2022) for the parish of Shrewley.
- The Shrewley Housing Needs Survey has its limitations because it is based on respondents' wishes, rather than an independent assessment of their actual need.
- There is no evidence that any housing at all is required specifically in this settlement at Hatton Station.

OBJECTION 5: The proposal does not comply with Local Plan Policy H3(b) Size, Design and Location.

- It is a disproportionately large development for a tiny settlement;
- It provides for an unproven housing need at Hatton Station;
- Hatton Station does not have any of the basic facilities required under paragraph 4.34 of the Local Plan and no "very strong justification" has been put forward;
- The site is in the Green Belt;
- The community has been ignored in drawing up the scheme.

SECTION 3

OBJECTION 6: The proposal will destroy what is in effect a nature reserve and important reptile habitat, create a 20% net loss in biodiversity and then compensate for the loss in a wholly inappropriate way by the purchase of off-site credits.

OBJECTION 7: Hatton Station does not have a sewerage system capable of absorbing 34 extra properties.

OBJECTION 8: There is evidence of contamination by arsenic and particularly asbestos on the site but this fact has been omitted from the Full Planning Application.

OBJECTION 9: Development at Hatton Station would encourage car dependency contrary to Warwick District Council's net zero carbon target.

The **Full Planning Application** places considerable reliance on the facts and statistics quoted in their **Transport Statement**. This report is wholly unsound. There is a detailed explanation in **Section 4**.

- Hatton Station lacks the services required for everyday needs.
- The rail and bus services are inadequate and no substitute for a car.
- This is an extremely car-dependent community where adults typically need a car each.
- New residents are likely to need to commute to work which will put them at extra expense.
- Hatton Station has already been identified as an unsustainable location in the analyses carried out for the forthcoming local plan.

OBJECTION 10: The area suffers from poor connectivity and cannot accommodate either construction vehicles, or more cars, without endangering pedestrians, cyclists and horse riders.

OBJECTION 11: Maps have been misinterpreted. The landscape character designation is incorrect and the site's sensitivity to housing development ignored.

SECTION 4: COMMENTARY ON SUPPORTING DOCUMENTS

The Full Planning Application draws on the findings of these reports. The following contain omissions, inaccuracies and poorly evidenced conclusions.

TRANSPORT STATEMENT, MAY 2024: This statement is particularly poor and should be disregarded in its entirety. It was written by someone with no knowledge of the area, it is full of inaccuracies, and it uses highly dubious "evidence" to support its conclusions.

FPCR PRELIMINARY ECOLOGICAL APPRAISAL, MAY 2024: Key surveys have not been conducted, or have been carried out but the findings do not appear in the report.

LANDSCAPE AND VISUAL APPRAISAL BY ZEBRA LANDSCAPE ARCHITECTS, MAY 2024: The author of this report has misinterpreted two vital maps. Thus, the landscape character is incorrectly

identified and a crucial point about the high sensitivity of the site to residential development has been missed.

AIR QUALITY ASSESSMENT REPORT BY RAPPOR CONSULTANTS LTD., FEBRUARY 2024: No testing has been carried out on site. Data provided is out of date leading to an erroneous conclusion about air quality. All references to dust mitigation during the construction phase are irrelevant because they do not acknowledge the contamination on the site.

ENERGY AND SUSTAINABILITY STATEMENT BY ENERGY AND DESIGN, 9TH JULY 2024: There are several references to the new houses having gas boilers. Hatton Station has no mains gas. This then casts doubt on the rest of the report's calculations.

NOISE AND VIBRATION ASSESSMENT BY HEPWORTH ACCOUSTICS, MAY, 2024: The survey time was too short, it ignores nighttime working by Network Rail and downplays noise pollution from the M40.

PARKING SPACES: This draws together data from the **Full Planning Application**, the **Transport Statement**, the **Highways and Parking Plan** and the **Design and Access Statement** documents. There are numerous inconsistencies. Particularly significant are the references to unallocated spaces; the **Highways and Parking Plan** seems to suggest unallocated spaces would be on-street parking.

DESIGN AND ACCESS STATEMENT BY UMAA ARCHITECTURE, MAY 2024: Inaccuracies and unsupported assumptions.

FULL REPORT

Application No: W24/0706

Registration Date: 11/7/2024

Parish Council: Shrewley

Land off Oakdene Crescent, Hatton Station

Redevelopment of the site and erection of 34 residential dwellings plus site access, parking, landscaping.

This objection has been prepared by:

**Karen Rollason
12 Antrobus Close
Hatton Station,
CV35 7BW.**

I have lived here for twenty-seven years and would be severely impacted by this development which would be at the bottom of my garden.

INTRODUCTION

This report sets out my objections to planning application W/24/0706 by Altus Homes and Morro Partnerships for land off Oakdene Crescent, Hatton Station.

It stems from a detailed analysis of the **Full Planning Application** and all its supporting documentation.

It will be demonstrated that:

Section 1. The decision to include this site on the brownfield register (entry R77) is incorrect.

Section 2. The development does not conform to the Local Plan.

Section 3. There are other serious issues relating to, inter alia, site contamination, biodiversity loss, sustainability and connectivity.

Section 4. Some of the supporting documents are flawed, particularly the Transport Statement which is fundamentally unsound.

DETAILS OF THE DEVELOPMENT

The planning application is for 30 houses and 4 maisonettes on a 1.17 hectare plot, commonly referred to as a former storage depot, lying adjacent to the small community of Hatton Station. It is intended that 100% of the dwellings are “affordable”. The houses and maisonettes would be provided with parking although it is unclear how many spaces there would be.

THE SITE AND ITS LOCATION

The site is on the brownfield register but this classification is not correct as outlined below. Hatton Station is washed over with Green Belt and is not a designated growth village. The site is outside the village boundary and has a narrow access road off Oakdene Crescent. The houses would sit behind existing properties in Antrobus Close; they would not form part of the existing street scene and could not be regarded as “in-fill”.

SECTION ONE: SITE IS NOT BROWNFIELD

OBJECTION ONE

This is not a brownfield site.

The **Full Planning Application** places significant emphasis on this site being brownfield or previously developed land.

The site is only part of a much larger site which has historically been referred to as a “former storage depot”.

The western side contained several Nissen huts, built to serve the Ministry of Defence as a munitions store from approximately 1943. The western part of the site stretched from Station Road to the area occupied now by the rear gardens of numbers 9-15 Antrobus Close. The Nissen huts were cleared away in the 1970s and Antrobus Close, Oakdene Crescent and Ash Close were built in their place.

A review of old aerial photographs shows that the eastern part of the site, for which this application is being made, has never been built on. There is some evidence of an oval track protruding partly into the area. (See photographic evidence at **Appendix A**)

The definition for brownfield or previously developed land, as it appears in the glossary to the Local Plan, **excludes:**

“land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”

- The site has completely rewilded itself and has long been recognised as a reptile habitat;
- There is no evidence of the track at the surface whatsoever and it was not found when test pits were dug;
- There is no evidence of any buildings on the site either historically or currently;
- There is some building rubble present below the surface and in small quantities on the surface. In the latter case, it is mostly covered in moss and offers refuge for wildlife.
- The most likely source of the small amount of rubble at the surface is the clearance of the western side of the site in the 1970s. Some of it may also have been fly-tipped as the site was open for many decades.

Conclusion: This is not a brownfield site.

SECTION 2: COMPLIANCE WITH THE LOCAL PLAN

The Planning and Compulsory Purchase Act, 2004, section 38 (6) states that:

If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

It will therefore be shown that:

- **This proposal does not comply with the Local Plan.**
- **There are no material considerations which would render this proposal acceptable.**

OBJECTION 2

It does not conform to the Local Plan Policy H1 New Housing because it is not in a suitable location.

H1: Housing development will only be permitted:

*a) Within urban areas (it is **NOT** an urban area);*

*b) Within named allocated sites (it is **NOT** an allocated site);*

*c) Within the boundaries of Growth Villages and Limited Infill Villages (**Hatton Station is NOT a growth village and the development falls OUTSIDE the defined village boundary**);*

d) In open countryside where:

*i. the site is adjacent to the boundary of the urban area (**NO**) or a growth village (**NO**);*

and

*ii. there is an identified housing need to which the proposed development can contribute (**NO – see comments at Objection 4 below**);*

and

*iii. the proposal is for a small-scale development (**NO – see Section 3: Objection 5**) that will not have a negative impact on the character of the settlement (**YES – see Section 3: Objection 5**) and the capacity of infrastructure (**YES – see Section 3: Objection 7**) and services within the settlement (**There would be no impact on services within the settlement because there are no services**);*

and

*iv. the proposal is with a reasonable safe walking distance of services (such as school or shop) (**NO – access to services is explored in Section 3: Objection 9 and the safety***

of walkers/cyclists in Section 3: Objection 10) or is within reasonable safe walking distance of a public transport interchange providing access by public transport to services, (NO – services extremely poor, see Section 3: Objection 9 and Section 4: commentary on the Transport Statement);

and

v. the proposal will not adversely affect environmental assets (including areas of ecological value, areas of high landscape value and designated heritage assets) unless these can be suitably mitigated (10% BNG cannot be achieved on site, see Section 3: Objection 6. It is an area of high landscape value and high sensitivity to residential development – see Section 3: Objection 11).

Conclusion:

- **The conditions above cannot be met by this development. This proposal does not comply with the Local Plan.**

OBJECTION 3

It does not conform to Local Plan Policy H2 Affordable Housing because it will not produce a truly integrated community.

An important principle is that a development should deliver 40% affordable housing. The intention is that affordable housing is properly integrated with the market homes. In particular:

4.23 The Council wants to ensure that new affordable homes are integrated on development sites, rather than concentrated in one area of the site. This will encourage inclusive and mixed communities.

On the face of it, providing 100% affordable homes may appear attractive. However, this also means that the requirements of 4.23 cannot be met.

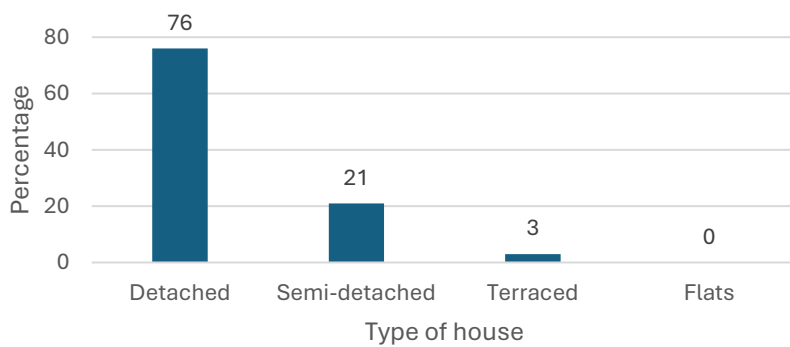
The **Design and Access Statement** by umaa architecture states that:

Due to the location at the edge of the village and access to the side of existing properties, the site is relatively self-contained and does not form any frontage to existing streets.

Thus, **by their own admission**, these houses will not be integrated into the existing community. Rather than being scattered, they will be concentrated in one area, tucked away at the back of the village down a narrow access road. The proposed houses are tiny, largely terraced and very obviously affordable housing when seen in the context of the neighbouring, detached, four bedroomed houses.

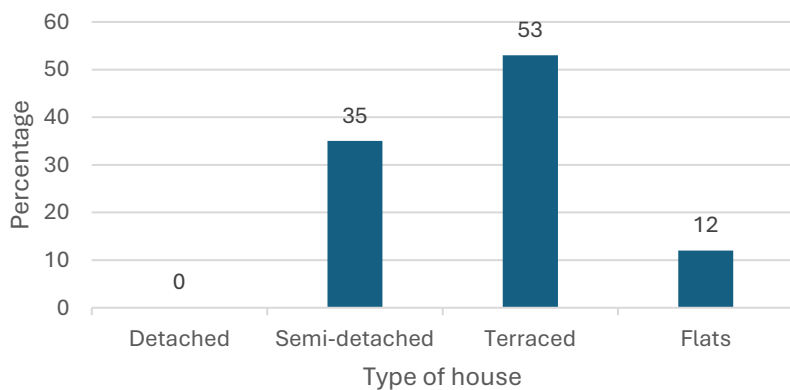
This is a summary of the housing types in the proposed development and in the existing community:

Percentage of each house type at Hatton Station



Source: housing count around the village.

Percentage of each house type in the proposal



Source: Site plan by umaa Architecture

Conclusion:

- Rather than producing a genuinely inclusive and mixed community, the location of this development, and the fact that it is 100% affordable houses, which are demonstrably different in size, density and character to surrounding houses, reinforces the notion of “them and us”.

OBJECTION 4

It does not conform to Local Plan Policy H3 (a) Affordable Housing in Rural Exception Sites because the developers have no evidence that this settlement of Hatton Station requires 34 houses to meet housing need.

This particular policy has been further expanded and exemplified by the **Affordable Housing Supplementary Planning Document, July, 2020:**

On page 29, this document states that paragraph 77 of the **NPPF**:

*...allows small groups of affordable homes to be built, subject to planning permission, in rural settlements to meet the needs of **that settlement** [our emphasis] on sites where housing development would not normally be allowed.*

Thus, the developers are required to demonstrate that the houses would meet the needs of the settlement of Hatton Station. The settlement is not required to absorb housing need from elsewhere.

H3 (a) Housing Need

This section of the **Affordable Housing SPD** explains how housing need is established.

In an attempt to justify such a large development, the developers commissioned a report, **Housing Need Assessment**, December, 2023, from Cotesbury. Cotesbury were asked to calculate the housing needs for the parishes of Shrewley; Budbrooke; Beausale, Hasely, Honiley and Wroxall; Guys Cliffe; Norton Lindsey and Rowington.

Most of this report is irrelevant because housing need should only relate to Hatton Station. Only the reference to housing need in Shrewley has any potential validity. However, it is stated in this report that the parish Housing Needs Survey for Shrewley has been discounted because it was conducted in 2014. Yet the most up to date **Shrewley Housing Needs Survey** carried out by WRCC Housing on behalf of Shrewley Parish Council was produced in 2022, and has been freely available on the Shrewley Parish Council website for some time.

The **Shrewley Housing Needs Survey** identified the following needs:

- **Local authority/housing association:** one flat and two bungalows.
- **Owner-occupier:** one bungalow and two houses.

On page 29, the **Affordable Homes SPD** states:

*Although surveys could be carried out of the needs of clusters of settlements/parishes, ultimately the information should be analysed on an individual settlement/parish basis because the affordable housing must **meet the needs of the settlement** [our emphasis] in which it is located.*

The survey was carried out across the parish and is not analysed to the level of detail required, i.e. to the individual settlement.

A further issue with parish housing need assessments is that it is a statement of housing wishes, rather than an analysis of genuine need. On page 11, question 10, it is noted that:

A preference does not necessarily relate to actual need. For example, a household with two adults and two young children under the age of four years with no saving and a joint income of £35,000 may prefer an owner occupier 4 bed house, but the need would be analysed as requiring a 2 bed house for rent.

In section 4, Conclusion, it states:

*It is concluded that, **based on the information by respondents**...[our emphasis]*

Conclusion:

- The Cotesbury Housing Needs Assessment is designed to demonstrate housing need over a very wide area when only the needs of Hatton Station should be considered. The most up to date data relating to the parish of Shrewley has not been used.
- There are some limitations to the usefulness of the 2022 Shrewley Housing Needs Survey because it is based on respondents' wishes, rather than an independent assessment of their actual need.
- There is no evidence that any housing at all is required specifically in this settlement at Hatton Station because the responses have not been analysed to that level of detail.
- There is no evidence that any housing need which may exist cannot be met in any other way.

OBJECTION 5

The proposal does not comply with Local Plan Policy H3(b) Size, Design and Location

In the **Affordable Housing Supplementary Planning Document**, July, 2020, H3(b) Size, Design and Location of the Scheme, page 29 – 30, it states that:

In Warwick District, rural sites tend to accommodate less than 8 dwellings because villages are small in size. The acceptability of sites, in terms of size, will therefore depend upon:

- *The level of identified need;*
- *The nature and size of the existing settlement;*
and
- *The nature and size of the site and the way in which it relates to the existing settlement.*

It has already been demonstrated that there is no evidence of any need at all and that if there is any, it will be for a tiny handful of homes.

This proposal is **NOT** small in scale in relation to the settlement as a whole. 34 is more than 4 times the suggested maximum of 8 dwellings noted above. Adding 34 homes to an existing settlement of just 112 homes is an increase of 30%. This is wholly disproportionate.

The nature of the site and how it relates to the existing settlement has been discussed under **OBJECTION 3** above.

This section states further:

All the dwellings must meet an identified need in a recent survey. However, notwithstanding the level of need, only small scale developments will be allowed and these should blend well into the existing settlement.

Furthermore, it states on page 30 that:

The design and layout of the scheme should be essentially rural in character and should integrate with the styles and materials which predominate in the surrounding area.

The proposed street scene, mostly of terraces of near-identical houses, is ugly and could not look more urban. They do not “blend well” into the existing settlement.

This section continues (page 30):

The scheme must be located within, or adjoining, an existing settlement with at least one of the basic services, as detailed in paragraph 4.34 of the Local Plan.

Paragraph 4.34 is reproduced below:

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 the facilities listed in paragraph 4.34 of the Local Plan and does not adjoin another settlement. Where is the “very strong justification”?

Furthermore, it states on page 30:

Proposals in the open countryside will not be acceptable.

As this development would sit outside the village boundary, it would therefore be in open countryside.

Rural Exception Sites in the Green Belt, page 30

The **Affordable Housing SPD**, refers to building in the Green Belt. It has already been demonstrated that the site is not “brownfield”. However, even if it proves impossible to overturn the decision to include it on the brownfield register, it does not change the fact that it sits in the Green Belt.

At page 30, it states:

...greater controls are needed to ensure that the fundamental objectives of the Green Belt are not harmed – in particular, the retention of the open nature and rural character of the countryside.

Obtaining Planning Permission for rural exception areas, page 30

The **Affordable Housing SPD**, page 30, states:

The applicant should involve the local community in drawing up the scheme.

No such approach to the local community has been made.

This section at page 30, continues:

Applications should be accompanied by the findings of the housing needs survey with an indication of which specific needs will be met.

No evidence has been provided of how the proposed development would meet the needs – whatever they might be – of Hatton Station.

Conclusion: The application does not comply with policy H3(b) because:

- It is a disproportionately large development for a tiny settlement.
 - The houses are ugly, they are not rural in character and do not “blend well” with existing properties.
 - Housing need at Hatton Station is unproven.
 - Hatton Station does not have any of the basic facilities required under paragraph 4.34 of the Local Plan and no “very strong justification” has been put forward.
 - The site is in the Green Belt.
 - The community has not been consulted in drawing up the scheme.
-

SECTION 3: OTHER OBJECTIONS

This section refers to other legislation, policies and guidelines, and also any problems which the application does not adequately address.

OBJECTION 6

The proposal will create a 20% net loss in biodiversity and this will be compensated for in an inappropriate way.

FCPR Environment and Design Ltd. Technical Note – Biodiversity Net Gain Assessment states:

Point 4.2 Results and Conclusion: Based on proposing habitats that are readily achievable and commonplace in residential development of this type, the BNG calculations will result in a net loss of -1.32 habitat units, representing a 19.4% loss, largely due to the loss of grassland, scrub and woodland habitats, which based on the current proposals are not compensated/offset within the scheme.

The Full Planning Application at 6.58 acknowledges this loss:

The development of the site will result in a negative biodiversity net gain figure of 19.94%. This equates to two habitat units and options for purchasing off-site credits within Warwickshire are being investigated.

Biodiversity Action Programme, 2024 – 2050, Warwick District Council

Theme 3, Objective 3, paragraph 3.31 gives the following objective:

Implementation of a spatial hierarchy which prioritises on-site delivery of BNG (delivered in the most appropriate way), followed by local off-site delivery and then the national credit system as a last resort.

At Section 4, How we will deliver the **Biodiversity Action Programme**, it states that:

Warwick District Council has already taken significant steps to halt decline, support recovery and manage biodiversity in Warwick District including (inter alia):

Working with Warwickshire County Council to be a national leader in biodiversity net gain through the local planning system.

It is quite understandable that if a developer wanted to convert an empty shop or vacant car park into apartments, making on-site BNG might be difficult. This seems a legitimate use of off-site delivery or resorting to the national credit system.

However, it is difficult to see how Warwick District Council could legitimately call itself a “national leader in biodiversity” if it is prepared to allow buying off-site credits in this case.

In support of the application, the developers have provided a further document: **FPCR Preliminary Ecological Appraisal, May, 2024**. A commentary on this report is provided below under **Section 4: Ecology Assessment**

A further issue relates to the part of the site which is not covered in housing. On the one hand, some attempt has been made on the plan to preserve some of the existing woodland and the pond. On the other hand, part of this area has been designated a children’s play area/trim trail. How is this compatible with wildlife?

Conclusion:

- **It is illogical to destroy a beautiful, rewilded site and reptile habitat, and then use off-site delivery as the chosen method of producing the required 10% BNG.**
- **It is inappropriate to preserve some of the natural landscape only to develop it as public open space.**

OBJECTION 7

Hatton Station does not have a sewerage system capable of absorbing 34 extra properties.

OBJECTION 1 refers to the unsuitability of the location because of its impact on infrastructure. This is so important an issue that it is presented here as a separate objection.

Planning document: Drainage Strategy Report produced by Jubb states:

4.1.1 The CON29DW response demonstrates that foul drainage connection is available immediately outside the entrance to the site off Oakdene Crescent, however the elevation of the sewer is such that not all of the site can be served by gravity drainage. Part of the site will need to be served by pumped foul drainage.

4.2.2 The site levels are such that 18 plots to the east of the development will be unable to achieve a gravity connection to that sewer. A pumped rising main is proposed to the affected units, terminating at a point within the development site.

The proposals for foul drainage fill only about a third of a page in a 25 page document. No reference is made to:

- How the sewerage system at Hatton Station works;
- The number of problems that it has caused in the past;
- The fact that it was allegedly already at capacity before the comparatively recent addition of the six Orbit houses in Oakdene Crescent;
- What the effect would be of pumping sewage from 18 houses – presumably under pressure – into the existing system.

Hatton Station's sewerage system dates back approximately 80 years and has been added to in a rather 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.

Severn Trent have been made aware of the existing problems and the risks of adding so many houses to this system.

It is noted that correspondence with Severn Trent has been redacted. This was queried but no satisfactory response has been received. This is not acceptable and simply arouses suspicion that vital information is not being shared. Perhaps Severn Trent do not want to admit that sewerage facilities at Hatton Station are inadequate.

Conclusion:

- **The developers must prove that the addition of 34 houses to a system already under strain will not have an impact on existing and future properties.**
- **It is not acceptable to redact correspondence with Severn Trent.**

OBJECTION 8

There is evidence of contamination on site.

Attention is particularly drawn to the fact that the report discussed below is NOT referred to in the Full Planning Application.

The report **Phase I/II Ground Investigation Report**, prepared by Arena Geo in November, 2023, was examined.

Their findings are as follows:

- Elevated levels of carbon dioxide were found in 3 out of the 4 boreholes.
- Elevated Arsenic was found in one of the soil samples.
- Asbestos fibres were found in 5 out of 8 soil samples.

In the case of arsenic, the authors of this report comment at 9.3, page 31:

...given the variability of the soil, there is the potential for contaminants to be present within any made ground soils.

They go on to say at **9.4.1 Human Health Risk Assessment:**

As the made ground was highly heterogenous, the probability of encountering arsenic or other metals contamination remains likely, and asbestos fibres may also be present. Therefore, the

*risk that on-site sources pose to human health users in the absence of a remediation strategy remains **High** [their emphasis].*

In the **9.4.3 Asbestos Risk Assessment, page 32 – 33**, it is stated that:

*The Preliminary Conceptual Site Model evaluated a **Moderate** risk of the inhalation of asbestos fibres to end users. As mentioned in Section 6.2, groundworkers are excluded from this risk assessment. In the absence of quantification testing, and without a remediation strategy in place, the risk to future site users is re-evaluated to **High** [their emphasis].*

9.5 Remediation Strategy

The authors of this report state that a remediation strategy will be required. Arena Geo particularly note that:

Given the material heterogeneity and potential construction issues it presents, it may be an option to dispose of this material off-site. In addition, as a result of the microscopic fibres of asbestos that were screened in some of the samples, it is a health and safety risk to re-use asbestos containing soil as fill, and the only safe option is to dispose in landfill. This would add a significant cost to the scheme but would have the benefit of significantly reducing the risk of any contamination to human health or controlled waters, as well as avoiding the use of deep foundations.

How will the health of site workers and residents be protected?

How will the stream running along the eastern boundary be protected?

10.5 Excavations

Arena Geo note that the developers may wish to level the site to avoid problems with “made ground”. This refers to a large area of the site where the ground appears to have been raised artificially. They note that in the trial pits on “made ground”, the sides were unstable, and that boulder sized concrete blocks were encountered.

At **Appendix A**, the issue with the “made ground” is illustrated. The photograph shows the distinctive edge to the “made ground” and an extract from a site map shows how this relates to the development.

10.8 Further Work, page 43

The report states that:

The potential for munitions waste is anecdotal, however it cannot be ruled out. Any future intrusive works should only be undertaken after a detailed desk study by a UXO specialist confirms that the risk is unacceptably low.

Appendix E of the Arena Geo report provides an Unexploded Bomb Risk Map produced by Zetica UXO. This shows Hatton Station in a low risk zone. However, this map shows the dangers posed by wartime bombs which may have landed in the area. **Our** issue, however, is leftover munitions from when the storage side of the site was cleared to build our homes. Several stories of residents finding leftover

munitions, including shells and hand grenades, have emerged. A photograph of the site at **Appendix A** shows that our concerns are legitimate.

Conclusion:

- **It is of concern that NO reference to this report has been made in the Full Planning Application whereas other supporting documents ARE discussed.**
- **As no reference is made to the Arena Geo report, it is unclear whether further testing is being organised, what mitigation is planned and how the health of existing residents would be protected.**
- **In view of the instability of the “made ground”, it is surprising that no reference is made to how this will be dealt with in any of the documents seen.**
- **Concerns regarding the presence of munitions should be taken seriously.**

OBJECTION 9:

Development at Hatton Station would encourage car dependency because of difficulties accessing services by any other means.

Access to Services

Hatton Station lacks services. The **Transport Statement**, written by someone who has clearly never visited the area, alleges that services to meet our everyday needs are within **safe** walking and cycling distance. This is untrue. See **Section 4** for a detailed commentary on this report.

We do not have:

- A supermarket. The nearest is Sainsbury’s in Saltisford – 7.4 kilometres
- A primary school. The nearest primary is the Ferncumbe – 2.6 kilometres
- A secondary school. The nearest is Aylesford – 8.1 kilometres
- A doctor’s surgery. The nearest is Claverdon – 5.5 kilometres. However, patients are sometimes referred to the main Trinity Court surgery which is in Stratford – 16.8 kilometres
- Access to Warwick Hospital and it’s A&E department – 8.5 kilometres
- Leisure facilities other than walking. The nearest leisure centre is at St. Nicholas in Warwick – 8.6 kilometres. (The swimming pool at Hatton Country World is £8 per session and there are only 5 public sessions per week – all during the day.)

In addition,

- Where would people work?

Buses

The scheduled bus services are extremely infrequent, and certainly could not be relied upon for commuting. Having spoken to users, the on-demand IndieGo bus is fine for an occasional trip with no time constraints, but it is not always available when required (making it unreliable for commuting or medical appointments) and often takes an extremely circuitous route to its destination.

Trains

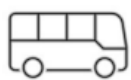
A lot of emphasis is placed on our proximity to the railway station. However, services are infrequent and, should the trains not be running, there is no replacement bus service due to poor road access.

(There are many errors regarding buses and trains in the **Transport Statement**, see **Section 4**.)

It might be argued that more people currently work from home. However, occupiers of affordable homes are likely to be workers in health, education, transport, retail and service sectors. None of these jobs can be done from home.

The effects of being car dependent

In view of the more limited incomes of those requiring affordable homes, it is illogical to place those people in a rural area. These are two important findings from a Rural Services Network report, **Rural Cost of Living**, published in July, 2022:



Transport: rural households spend on average £113.90 per week on transport compared to £76.20 for urban households. For rural households, transport costs represent a **higher proportion of their disposable income (12.3% vs. 9.9%)**.



Food Prices: rural households spent £65.60 a week on food and non-alcoholic beverages, which is 2% more than urban areas. These differences are also likely to be higher for rural households where physical access to food shops or digital access to online shopping is an issue.

Higher food prices may result from over-reliance on small, rural grocery shops due to lack of transport to cheaper supermarkets.

Unrealistic assumptions about car ownership and the number of extra car journeys which would be generated.

In the **Full Planning Application**, it states that the development of the site would only generate:

*...a net additional 7 trips per day compared to **the existing lawful storage use** [our emphasis].
This is not a significant change and results in a negligible impact.*

This is a strange comparison to make since the site has not operated as a storage depot since at least the 1970s and possibly for far longer than that.

Reliance has been placed on data from the **Transport Statement** which is analysed in more detail in **Section 4**. Here it states that there would be 14 outward journeys between 8:00 and 9:00 and 12 inward journeys between 17:00 and 18:00. These calculations are underpinned, however, by some wholly unreliable assumptions based on vehicle movements in more urban areas. This is discussed in more detail in **Section 4: Transport Statement**

The **Full Planning Application** states that approximately 51 vehicles would be owned by future residents (again, extrapolated from unreliable data, see **Section 4: Transport Statement**). This is probably a low estimate and, in an area of such high car dependency, the number of outward and

inward journeys would be considerably higher and would create extra danger for pedestrians, cyclists and horse riders.

Current thinking about sustainable communities

WDC Net Zero Carbon DPD, SA Adoption Statement, May, 2024:

Warwick District Council declared a Climate Emergency on 27th June, 2019. It aims to become a net zero carbon organisation by 2025 and to:

... facilitate others so that total carbon emissions within Warwick District are as close to zero as possible by 2030.

How is this bold statement compatible with approving a development which would actively promote car dependency?

The current Local Plan was approved in 2017. In terms of sustainability issues, much has moved on. The application is being made under the current Local Plan, but to ignore some of the developing themes in the forthcoming plan *at this stage* would be illogical.

Sustainability Appraisal of the SWLP: Regulation 18 Issues and Options – Small Settlement Locations, November, 2022:

This document looks at a number of small settlements in south Warwickshire and rates them against SA objectives:

Hatton Station's scores:

- Distance to A&E: minus rating
- Access to GP surgery: minus rating
- Local services: minus rating
- Access to primary school: minus rating
- Access to secondary school: minus rating
- Access to a food store: minus rating

South Warwickshire Settlement Analysis, January, 2023:

The aim of this document was to analyse each settlement in south Warwickshire in a systematic way to establish how closely it matches the ideal of a “20 minute neighbourhood”. Its findings echo those of the earlier Sustainability Appraisal.

Its verdict on Hatton Station:

Local facilities within 800 metres:

- Retail, jobs and economy: 2
- Places to meet: 3
- Open space, leisure, recreation: 0
- Healthcare: 0
- Education: 0

SWLP Update, May, 2024 – Spatial Growth Options: Supplementary Paper:

The Issues and Options Consultation presented five possible spatial growth options. Each growth option was evaluated against the 13 Sustainability Objectives and “Dispersed”. Option 5 (Dispersed) proved to be the worst performing option. The proposed development would fall into the “dispersed” category:

SA Objective 1 – Climate Change

Option 5 (dispersed) scored double minus because of an over-reliance of motorised transport.

SA Objective – Accessibility

Option 5 (dispersed) scored double minus due to the reliance on cars and lack of sustainable travel alternatives.

SA Objective – Health

Option 5 (dispersed) scored double minus because of a lack of access to A&E within a sustainable distance (defined as 5km).

Conclusion

- **Hatton Station lacks the services required for everyday needs.**
- **The rail and bus services are inadequate and no substitute for a car.**
- **This is an extremely car-dependent community where adults typically need a car each.**
- **New residents are likely to need to commute to work which will put them at extra expense.**
- **Encouraging car dependency is incompatible with Warwick District Council’s aim to meet its net zero carbon target.**
- **Hatton Station has already been identified as an unsustainable location in the analyses carried out for the forthcoming local plan.**

OBJECTION 10

The area suffers from poor connectivity and cannot accommodate either construction vehicles or more cars without endangering pedestrians, cyclists and horse riders.

Sustainability Appraisal of the SWLP: Regulation 18 Issues and Options – Small Settlement Analysis:

Small settlements were analysed in terms of the road network:

Connectivity: “The majority of Hatton Station lies within areas of poor (Grade D) and moderate (Grade C) connectivity with the area south of the M40 falling into Grade E”.

Roads around Hatton Station are completely unsuitable for construction traffic and unsuitable for any increase in road traffic. (Photographic evidence is attached at **Appendix A.**)

Station Road

The only viable route into Hatton Station is from the north is via Station Road. To the south of Hatton Station, the roads become single track. There are a number of issues with Station Road:

- Two sharp, blind bends;
- Difficult for two vehicles to pass each other outside the Banana Moon nursery and over the railway bridge, especially after the installation of high kerb stones;
- No pavement;
- No verge for much of its length;
- Steeply banked sides in parts, offering no refuge for pedestrians;
- No street lighting;
- Widely used by pedestrians, cyclists and horse riders but not wide enough for vehicles to give the necessary clearance as specified in the Highway Code;
- Poor visibility in both directions where the entrance to the station meets Station Road. Near misses are extremely common.

Oakdene Crescent

- Full of parked cars.
- Dangerous when the school bus arrives because of the high number of pedestrians and the need for the bus to reverse into Oakdene Crescent.
- Exit from Oakdene Crescent onto Station Road has poor visibility to the right because of the railway bridge. Near misses are common.

Hockley Road

- The Little Shrewley crossroads where Station Road meets Hockley Road has been the scene of several accidents. Visibility to the left is particularly poor because of the blind summit to the left by Barnclose Nurseries.

Conclusion:

- **Hatton Station suffers from poor connectivity.**
- **Station Road is not suited to the traffic it currently carries and poses a danger to pedestrians, cyclists and horse riders.**
- **Station Road is not suitable for construction traffic.**
- **Oakdene Crescent cannot cope with the passage of more cars and is also unsuitable for construction traffic.**
- **Roads to the south of Hatton Station are single track.**

OBJECTION 11

The value of the landscape and its sensitivity to housing development have not been recognised. This is because of errors in the Landscapes and Visual Appraisal Report; two important maps have been misinterpreted.

The errors are explored in much greater detail in **Section 4: Landscape and Visual Appraisal.**

In the case of the landscape designation, the site falls within Ancient Arden. In the **Warwickshire Landscape Guidelines**, Warwickshire County Council, 1993, it states:

This landscape is especially significant as it is the only area of ancient countryside in Warwickshire.

It is particularly important to note that the management strategy for Ancient Arden is restoration and conservation.

In a further report, **Landscape Sensitivity and Ecological and Geological Study, November, 2013**, this specific site is rated as “high” in relation to landscape sensitivity because it is a recognised reptile habitat.

Sustainability Appraisal of the SWLP: Regulation 18 Issues and Options – Small Settlements, November, 2022:

This document looks at a variety of small settlements in south Warwickshire and rates them against Sustainability Appraisal Objectives:

Ratings for a hypothetical development at Hatton Station are given as:

- Impact on Landscape Character: minus rating;
- Landscape Sensitivity: double minus rating
- Special Landscape Areas: minus rating.

Conclusion:

- **There are serious errors in the Landscape and Visual Appraisal.**
 - **The planning application would destroy an area of Ancient Arden when the recommended management strategy is to restore and conserve it.**
 - **It would destroy a reptile habitat.**
-

SECTION 4:

This section provides additional provides a commentary on the supporting documents provided by the developers. These reports have significant inaccuracies and omissions.

1. Transport Statement – this report in particular is unsound and should be disregarded.
2. Ecological Assessment – omissions.
3. Landscape and Visual Appraisal – serious errors.
4. Energy and Sustainability Statement – errors.

5. Air Quality Assessment – inadequate.
6. Noise and Vibration Assessment – inadequate.
7. Parking spaces – this is not one document but a commentary on the inconsistencies both within and between supporting documents.
8. Design and Access Statement – errors.

1. TRANSPORT STATEMENT

This report, more than any other, is littered with errors.

Page 10

Hatton is a village with a population of approximately 2,300 residents (2011 census).

Hatton Station only has around 112 homes. 2,300 is roughly the population of the whole of Hatton Parish. It is obviously not the population of Hatton Station which, in any case, is in Shrewley Parish.

Local Facilities and Services

4.3.3 A range of facilities and services, which serve the daily needs of Hatton Village are reachable from the site by sustainable means. Accordingly, there will be by no means a requirement to rely on the use of the private car for daily journeys.

This is nonsense.

It goes on to say that 2km would be an acceptable distance for pedestrians to walk. Leaving aside whether the “services” are ones anyone would want to use, attention should be focused on the distances that are quoted. Some are suspiciously short and seem to have been calculated using the canal towpath and several PRow. The problem with using these routes is that they are not always accessible:

- In winter, particularly if it is muddy;
- When cows are present (not a barrier to everyone but can be off-putting);
- In the dark as the routes are wholly unlit. The canal towpath is particularly dangerous, not only because of the canal itself but because there is a steep drop along much of the length;
- By pushchair or wheelchair owing to the kissing gates onto the PRow and the steps down onto the canal bank.

Thus, the only realistic routes which can be used all year round are by road. This being the case, some of the distances are seriously understated.

At 4.3.16, it is commented that:

Footways are illustrated in Figure 4.3. It can be seen that footways flank Oakdene Crescent. Footways are also provided along the B4439, Shrewley Common and The Green which provides

pedestrian access to the facilities provided along these roads including retail opportunities, primary schools [plural?] and pubs.

If it necessary to reach the B4439 Hockley Road, Shrewley Common or Hatton Green, **without** using PRow or the towpath, then Station Road is the only possible route. Walking along local roads, particularly Station Road, is challenging, particularly in the dark or poor visibility as explained in

OBJECTION 9

Cycling Infrastructure, page 14

Cyclists will encounter similar dangers to pedestrians, especially along Station Road. The PRow are not suitable because they are accessed by kissing gate and the towpath can be dangerous, especially in the dark. This is because of the problems mentioned above and because of low headroom under some of the bridges.

Services and facilities, page 12

Turning to the “facilities and services” which people might wish to access by walking or cycling, the lack of familiarity with the area by the author is plain to see.

Some of the “facilities and services” are:

- Barn Close Nurseries – purchases are often bulky and require a car;
- Shrewley Stores – suitable for casual purchases but not for a “big shop”;
- Hatton Shopping Village – does not sell anything remotely useful. Not suitable for everyday needs;
- Holy Trinity Church – unlikely to be needed by many people;
- Mid Warwickshire Yacht Club – a private members’ club of interest to very few;
- Tunnel Barn Farm – for fishing, limited appeal;
- Hatton Country World Swimming Pool – expensive, only five public sessions a week.

(The **Full Planning Application** helpfully adds the campsite at Hatton Country World as a local facility.)

The report ignores the lack of access to facilities that people actually need: supermarkets, schools, healthcare and leisure facilities of more general appeal than boating and fishing.

Public Transport Infrastructure, page 15

Figure 4.5 Public Transport Infrastructure Map – this places Hatton near **Worcester** Parkway Train Station.

Bus Services, page 15

The information supplied is incorrect. The bus route is the 514 between Leamington and Solihull, NOT Leamington Spa and Henley in Arden. It is stated that the bus operates on a Wednesday and a Saturday when the actual days are Monday and Saturday. See **Appendix B** for details.

Important additional points to note:

- This bus only operates **ONE** return trip on each of the two days it is available.
- It is necessary to telephone the bus operators in advance if you wish the bus to come to Hatton Station.

Railway Services

The table of rail frequencies in the **Transport Statement** is incorrect. See **Appendix B** for all the correct times.

Note that the author of the **Transport Statement** has supposedly referred to direct times so only the actual direct times are quoted here for comparison:

Destination	Approximate Frequency of Direct Services according to the Transport Statement	Actual Frequency of Direct Services according to real rail timetables
Leamington Spa	Twice an hour	Trains typically alternate between 50 minute and 70 minute intervals.
Stratford upon Avon	Hourly	Every two hours – longer between the last two trains of the day. NB. The first train of the day is not until 9:52am making it unsuitable for most commuting.
Birmingham Moor Street	Hourly	There is a 30 minute gap between the first two trains. There is an hour gap between the 2 nd and 3 rd trains. For the remainder of the day, trains are every two hours.
Birmingham Snow Hill	Four times a day	Monday to Friday, there are two trains – one at 14:17 and one at 22:44
London Marylebone	Four times a day	Monday to Friday, there are two direct trains. One is at 17:06 and the next one is at 19:40. Both are unsuitable for commuting. Only on a Saturday , there are trains every 3 hours.

Hatton is a DfT Category F1 station, recognising that it is unmanned, has no facilities and no disabled access. The footbridge is difficult to negotiate with a pushchair or heavy shopping.

The author points out that Warwick Parkway has better access but does not mention that a car will be needed to get there.

4.4 Highway Network, page 16

Oakdene Crescent is a residential cul-de-sac subject to a 20mph speed limit.

It is 30mph.

In the vicinity of Oakdene Crescent, Station Road measures 5.5m and is subject to a 50mph speed limit.

is 30mph.

4.5 Highway Safety

In this section, accident statistics are quoted and a conclusion drawn that:

Any potential change in the volume and composition of traffic as result of the proposed development should not have an impact on highway safety.

How has this conclusion been arrived at? This is important because the number of vehicle movements generated by these houses has been significantly underestimated. See the commentary on Part 6 of the **Transport Statement** below.

4.6 Summary, page 16

*The site is within a suitable walking and cycling distance of numerous day-to-day facilities **within** [our emphasis] Hatton Village and is located in close proximity to Hatton Railway Station, providing regular rail services to multiple destinations, including London, Birmingham and Stratford-upon-Avon.*

Thus, the author is stating that there are day-to-day facilities within Hatton Village (by which it is taken to mean Hatton Station). A post box and a members-only yacht club?

As has been demonstrated above, the trains are far from regular and do not always support commuting at the usual peak hours.

5.3 Vehicle Access, page 19

The speed limit is misquoted again.

5.5 Parking Provision, page 19

Comments about the calculation of parking spaces have been transferred to a separate section below. This is because of inconsistencies in the number of car parking spaces across a variety of documents. The number of car parking spaces proposed is not consistent **within this one document**.

At 5.5.2, an attempt is made to downplay the numbers of cars likely to be owned by residents in affordable housing. It quotes 2011 census data for MSOA E00159515 which is just Hatton Station plus a handful of properties south of the M40. Affordable housing at Hatton consists of just 6 households and yet the author is confident to extrapolate from this that the proposed households would only have 51 cars between them.

...the average car ownership is 0.2 - 1.5 vehicles per household in the local area for affordable housing. Therefore, for the proposed 34 dwellings, a total of 51 owned vehicles are forecasted.

There are two ways to approach this. Either:

- It is a significant underestimate because it is a very car-dependent community where adults tend to have a car each;

OR

- It is an accurate assessment in which case it would be extremely damaging to the well-being of potential residents to place them in properties where they are unable to access even a supermarket without a car. One non-driving resident finds living at Hatton Station extremely difficult, particularly during the winter.

6. Trip Generation and Traffic Impact

This section is deeply flawed as it is based on inaccurate assumptions.

6.2 Extant Land Uses, page 20

At 6.2.1, it states:

In order to determine the number of vehicle trips associated with the previous storage depot which operated at the site, the national database for trip generation, TRICS, has been consulted for “retail” uses with the subcategories “builders merchants” (for which best suits the previous operation)...

The author does not appear to know that this site has not been used as a storage depot for over 50 years. On what grounds is a builders’ merchant a best fit for the site?

Amongst the criteria used in this section, one criterion listed is:

Edge of Town and Edge of Town Centre and the Suburban Area

Hatton Station is none of these.

All the data at 6.2.2 is therefore irrelevant and should be disregarded.

6.3 Proposed Development

TRICS has been used again to assess how many trips would be generated specifically by residents of affordable houses. Again, one of the criteria used to select “comparable” locations is:

Edge of Town and Edge of Town Centre and the Suburban Area

At 6.3.2, the conclusion is drawn that at Peak Hours (8:00-9:00), there would be 14 outward trips and that at Peak Hour (17:00-18:00), 12 inward trips would be made.

In Appendix E, TRICs Outputs, the supporting data is given. The methodology used is flawed.

Five sites were selected to produce supposedly comparable data:

Address	Type of Housing	Type of Area
Addison Drive, Lincoln	Flats	Suburban Area (PPS6 Out of Centre

Watcombe Road, Nottingham	Block of flats	Suburban Area (PPS6 Out of Centre)
Shelley Road, Worthing	Blocks of flats	Edge of town centre
Billinge Street, Blackburn	Semi-detached/Terraced	Edge of town centre
Whiteacre Street, Huddersfield	Mixed houses	Edge of town
Coleman Road, Leicester	Semi-detached/terraced	Suburban Area (PPS6 Out of Centre)
Lincoln Green Road, Leeds	Terraced	Suburban Area (PPS6 Out of Centre)
Tarbock Road, Liverpool	Terraced	Edge of town

There are two important points to make here:

- Residents of flats are less likely to own cars. Only 49% of people living in flats have access to a car or a van. This compares with 92% of people living in detached houses, 84% in semi-detached houses and 78% of people living in terraced houses. (Census data, 2021)
- Those living within suburban areas and on the edges of town centres are likely to have much better access to public transport and own fewer cars.

These locations were all examined on Google maps. They are all urban in nature and in **no way** reflect our community or its location. Why was a comparable rural location not chosen?

From the flawed data at 6.2 and 6.3, the author has then calculated the potential increase in journeys created by the development.

In the **Full Planning Application**, the data relating to vehicle movements in total and the increase in vehicle movements has been repeated. It should be disregarded.

6.5 Construction Impact

The author seeks to downplay the impact of construction vehicles. However, this Transport Statement ignores the ability of surrounding roads to support the movement of large vehicles. Photographic evidence is supplied at **Appendix A**, illustrating the difficulties encountered by large vehicles.

Conclusion:

- **The Transport Statement has no validity whatsoever due to the number of inaccuracies and unsupported assumptions made.**

2. ECOLOGICAL ASSESSMENT

FPCR Preliminary Ecological Appraisal, May, 2024

The problem with this particular report is that it is incomplete and its authors acknowledge this:

Page 1:

A Preliminary Ecological Appraisal is not intended as a comprehensive submission document for a planning application, as additional faunal studies are recommended.

Issue 1: Para. 2.4

The Phase 1 Habitat Survey was completed on 20th February, 2024. This is too early in the year to produce a comprehensive list of plant and animal species.

Issue 2: Para 2.7 Bats

This study confined itself to looking for potential, but not actual bat roosts. It was too early in the year to observe bats. No bat study has been undertaken. Video and audio recordings (made using a bat detector) have been made in the vicinity and are available on request.

Issue 3: Point 2.10.

The watercourse was not assessed for riparian mammals.

Issue 5: Point 3.10 – 3.15 Amphibians, Reptiles and Crustaceans

The site is a known reptile habitat.

In 2006, 84 slow worms and 17 grass snakes were translocated from the site of the six Orbit houses to a tiny triangle of land on the southern boundary of this site (owned by Orbit). These reptiles spread out across the site in question to join an existing population.

Sightings of newts and slow worms have been made this spring.

The problem with this report is that the results from the reptile survey carried out by FCPR are missing. In addition, the methodology used by FCPR has been questioned with the Ecology Team at Warwickshire County Council.

The Amphibian and Reptile Conservation Trust has produced detailed guidelines on how an amphibian and reptile survey should be carried out. According to an FPCR employee who was collecting up the reptile mats on 3rd June, the survey had been completed (seven site visits) and they were not due to return. ARC advice, however, is that there should be two surveys: one between 1st March and 30th June (four site visits) and a second between 15th August and 31st October (two site visits).

It was also noted that due to the warm, damp spring, vegetation quickly engulfed the mats. It appeared from the lack of disturbance to surrounding vegetation, that not all the mats were not being surveyed. (There is no implied criticism of the people carrying out the surveys; the mats became increasingly difficult to find.)

Issue 7: Point 3.45 Reptiles

This states that reptiles were not recorded during the Phase 1 Habitat Survey. This may give the misleading impression that reptiles are not present. It should be remembered, however, that this Phase 1 Habitat Survey was carried out in February when they are hibernating.

Issue 8: Point 3.46 – 3.48 Great Crested Newt

The report states that the on-site pond is an unlikely habitat for great crested newts but no actual survey has been carried out.

Thus:

- The desk study correctly confirms the presence of grass snake and slow worm populations in the area, backed up by observations by residents.

However:

- The Phase 1 Habitat Survey was carried out at the wrong time of year;
- There has been no bat survey carried out whilst bats are active;
- No survey has been carried out to confirm or otherwise the presence of great crested newts.
- The stream was not checked for riparian mammals.
- No reptile survey results have been included.
- The methodology used in the reptile survey (which was observed by residents) is questionable.

Conclusion:

- **Only limited reliance can be placed on this report.**

3. LANDSCAPE AND VISUAL APPRAISAL REPORT

This gives further information in support of **OBJECTION 2** and **OBJECTION 11**.

Landscape and Visual Appraisal by Zebra Landscape Architects, May, 2024

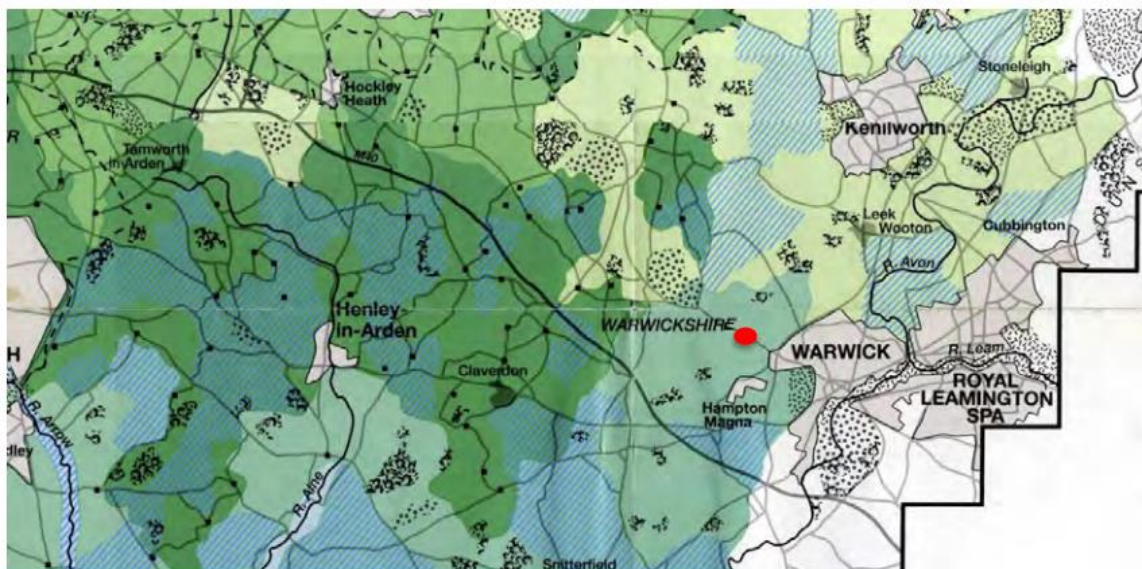
Two conclusions drawn by this document are flawed.

1. Landscape Character

From page 37, reference is made to this document:

Regional Landscape Character: Warwickshire Landscape Guidelines, 1993

Image ZLA 7.2: Extract from the Warwickshire Landscape Guidelines (1993), Arden Landscape Map.
N.B. ZLA has identified the approximate site area is indicated with a solid red circle.

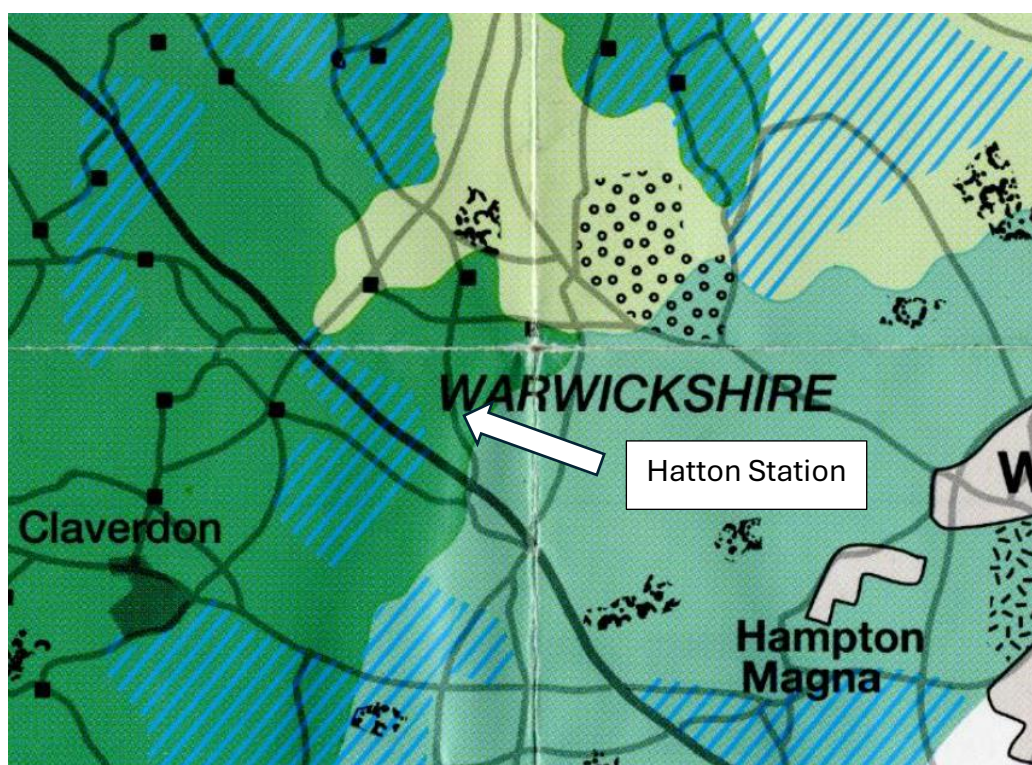


The solid red circle is in **completely the wrong place** and is several miles from Hatton Station. The area indicated is on the A4177, not far from the A46.

As a result, the area has been classified as “Wooded Estatelands”. This is incorrect.

Hatton Station is in Ancient Arden. This is confirmed by:

- This very map. It is helpful to zoom in further as shown below.
- The Landscape team at Warwickshire County Council. (correspondence attached)
- The Warwick District Council Landscape Sensitivity and Ecological and Geological Study, November, 2013



Extract from the same map as above but focused on Hatton Station.

Extract from an email from the Landscape Team at Warwickshire County Council:

produced before the age of digitised data! You should be able to work out the road network which gives reference points (I would say that just under the 'W' of the word WARWICKSHIRE is roughly where the station is!). The majority of Station Road lies within Ancient Arden, except at its southern end, near the M40 it just goes into the edge of the Wooded Estatelands, which is the whole area to the east, covering the majority of the Arkwright estate (I don't know the exact boundaries of the estate).

Reference should also be made to the “General Strategy” and “Management Strategy” in the key which accompanies this map:

General strategy

Conserve the historic, well-wooded character of the region. ←

ANCIENT ARDEN

Overall character and qualities

A small scale farmed landscape with a varied, undulating topography, characterised by an irregular pattern of fields and narrow, winding lanes.

Characteristic features

- A varied undulating topography.
- A network of winding lanes and trackways often confined by tall hedgebanks.
- An ancient irregular pattern of small to medium sized fields.
- *Hedgerow and roadside oaks.*
- Field ponds associated with permanent pasture.
- Many place names ending in Green or End.

Management Strategy

Conserve and restore the ancient irregular landscape pattern. ←



Conclusion:

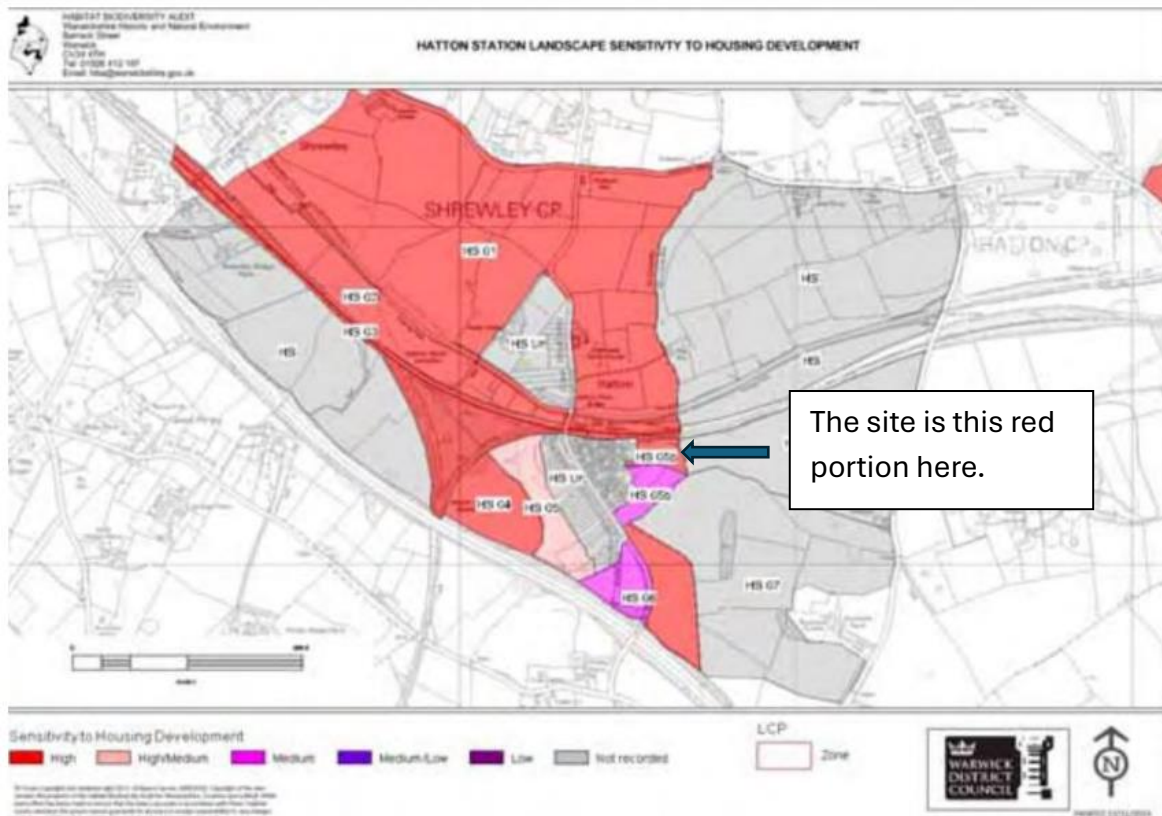
- All of points 7.7 to 7.13 on pages 27 to 28, are invalid because the wrong area has been identified.
- The site is within an area of high landscape value and it should be restored and then conserved, not destroyed.

2. Landscape Sensitivity

In Warwick District Council's Landscape Sensitivity and Ecological and Geological Study, November, 2013, the specific site is rated "high sensitivity" to new residential development.

Landscape and Visual Appraisal by Zebra Landscape Architects, May, 2024:

At paragraph 7.16, The Warwick District Council **Landscape Sensitivity and Ecological and Geological Study**, November, 2013, is referred to. The correct map is supplied at point 7.18.



At 7.21, the author correctly identifies that the site sits within the area labelled HS-05b zone and then at point 7.33, states that this zone is classed as “medium sensitivity” to new residential development. But this is not completely true.

The site in question is shown as **red** (“high sensitivity” to new residential development), **a point which is clear from both the map and the text but ignored by the author.**

The November, 2013 document states in respect to HS-05b:

This zone comprises a sub-regular pattern of small to medium-scale pastoral farmland including an area of regenerating scrub with garden escapes (buddleia, damson) and self-seeded young trees including oak, birch, hawthorn and willow, the northern edge forming part of Hatton Country World’s “Watery Stroll”.

In the next paragraph, the report goes on to say:

*The area of scrub is an important reptile habitat and therefore **should not be developed** [our emphasis].*

Conclusion:

- The site should be correctly identified as an area of “high sensitivity” to residential development because of the presence of protected reptiles.

4. ENERGY AND SUSTAINABILITY STATEMENT

The proposal casts doubt on the ability of Warwick District Council to meet its obligations under its newly adopted Net Zero Carbon policy which is effective from May, 2024, because of a stated intention to install gas boilers.

An Energy and Sustainability Statement was produced by Matthew Hurd of Energy and Design on 9th July, 2024.

This report assesses which particular technologies *could* be used. It concludes:

Suitable	Unsuitable
Heat pumps	Biomass
Photovoltaic	Solar Hot Water



It then goes on to state at 5.7 that Heat Pumps and Photovoltaics have been selected as the preferred technologies to meet current regulations.

BUT, in the summary, it is noted at 9.7 that:

The site is designed to use gas for heating and hot water.

Furthermore, at **Annex, part 1: New Build Development – Part 2**

Annex Part 1: New Build Development - Part 2

Primary Heating Source	Electrical systems (including air source heating, ground source heating, thermal storage, heat recovery, direct electric heating)		
	Biomass Systems		
	Fossil fuel systems (including gas and oil boilers)	X	
Secondary heating source (if required)	Electrical systems (including air source heating, ground source heating, thermal storage, heat recovery, direct electric heating)	N/A	
	Biomass Systems	N/A	
	Fossil fuel systems (including gas and oil boilers)	N/A	
Heating split between primary and secondary heating source	Primary:	Secondary:	
	100		
Will the development have a mains gas connection (existing or proposed)	Yes (Existing)		
	Yes (Proposed)	X	
	No		

...the reference to mains gas has been repeated.

Finally, Appendix B, a sample BREL Compliance Report repeats the reference to mains gas.

Conclusion:

- The nearest gas main is understood to be several miles away so it does not seem feasible to use mains gas for heating.
- If all the calculations in this report are based on mains gas, then their validity must be called into question.
- Should gas boilers be allowed, retrofitting would be required at some point.

5. AIR QUALITY ASSESSMENT

This is a commentary on the **Air Quality Assessment** report produced by Rappor Consultants Ltd. in February, 2024.

There are a number of omissions and inaccuracies in this report. Attention is particularly drawn to:

Section 4: Construction Phase Dust Assessment, page 8

This report only considers the dust which might arise from a typical building site. They have not taken the contamination of the site into consideration. This is a lost opportunity; the **Air Quality Assessment** report postdates the **Ground Investigation Report** by three months.

Section 6 Operational Exposure Assessment, page 13

The site currently comprises vacant commercial premises...

The site has never contained commercial premises and this sort of basic error does not encourage confidence in its findings.

6.3 Local Air Quality Monitoring and Management, page 13

The consultants have **NOT** carried out any on-site air quality monitoring. The monitoring station data used is from Warwick.

Table WDC 6.1 NO₂ Monitoring Data

The problem with this table is that not only was there no on-site monitoring (all the sites listed relate to Warwick), but a misleading conclusion is drawn from it because the data is out of date. Why has data only been included up to 2020 when the 2022 data is available?

Table 6.1: WDC NO₂ Monitoring Data

Site	X	Y	Site Type	Annual Mean NO ₂ Concentration					2022
				2016	2017	2018	2019	2020	
W5	427615	264563	Roadside	40.4	35.3	27.7	26.5	22.8	22.8
W39	427910	264541	Roadside	30.7	31.5	24.6	23.2	19.4	21.5
W41	427905	264682	Roadside	26.7	27.6	23.2	21.3	26.0	19.1
W42	427938	264947	Roadside	33.4	32.1	28.3	28.3	21.1	22.2
W44	427930	265200	Roadside	32.5	34.8	28.0	25.3	20.7	23.5
W45	427867	265275	Roadside	29.6	31.2	25.9	25.2	19.9	21.5

At 6.6, page 13, the report concludes:

The data demonstrate an overall downward trend in annual mean NO₂ concentrations at the closest monitoring locations to the site, which indicates that air quality is improving.

This is not the case. 2020 was the year most affected by COVID-related lockdowns and the 2022 data shows that the trend is **upwards**.

There are three pages of redactions. This is **NOT** acceptable.

Appendix D – Construction Phase Dust Mitigation can essentially be ignored as there is no reference to how residents will be protected from the removal of soil containing arsenic and asbestos.

Conclusion:

- **This report has not adequately addressed air quality at *Hatton Station*.**
- **Data provided is out of date leading to an erroneous conclusion that air quality is improving.**
- **All references to dust mitigation are irrelevant because they do not acknowledge the contamination on the site.**
- **Redactions are not acceptable. What are they trying to hide?**

6. NOISE AND VIBRATION ASSESSMENT

The **Noise and Vibration Assessment** was produced by Hepworth Acoustics in February, 2024.

There are some issues with the methodology used. The monitoring equipment was only in place for a brief amount of time, encompassing two full daytime periods and three nighttime periods. This is described as an “extended” survey due to variations in freight activity.

The problem with such a short survey is that it does not capture other forms of noise.

Immediately opposite the site, there is a Network Rail storage depot. Work is always carried out **DURING THE NIGHT**. It is mostly at weekends but occasionally during the week, and sometimes on consecutive nights. The storage area is extremely brightly lit and the noise from heavy plant and machinery movements is significant. See **Appendix C** for the type of warning letter received by residents.

Sustainability Appraisal of the SWLP: Regulation 18 Issues and Options, November 2022:

This document recognises that it is not healthy to live alongside a railway line.

SA Objective 6: Environmental Pollution

- Development proposals within 200 metres of a Railway Line: minus rating

A surprising feature of **Noise and Vibration** report is that little reference is made to the presence of the M40. Traffic levels have broadly increased since it was opened and it is now a constant and intrusive presence. Unlike the railway, where the noise levels are high but largely intermittent, the traffic noise from the motorway continues day and night.

Conclusion:

- **Nighttime working by Network Rail has not been taken into account.**

- **Building within 200m of a railway line is not recommended for the sake of the health of residents.**
- **The author of this report does not adequately address the noise from the M40.**

7. PARKING SPACES

It is of concern to residents that sufficient parking is provided so that cars do not spill out onto neighbouring roads where there are already many parked cars.

Unfortunately, each reference to car parking has a different calculation of the car parking spaces which need to be provided:

Map or Document	Allocated	Unallocated	TOTAL
Transport Statement (calculated from the information given in the table at 3.3.10 which, in turn, is taken from the Parking Standards SPD)	66	13	79
Transport Statement (calculated from the information in the table given at 5.5.1) – proposed parking provision	64.4*	0	68 (?)
Highways and Parking Plan umaa architects (note that the legend does not tie up with the actual map)	68	2	70
Full Planning Application , page 28	51	17	68
Full Planning Application (calculated from the information given in the table at 5.64 which is, in turn drawn from the Parking Standards SPD)	66	13	79

*The decimal arises from the fact that 0.6 of a parking space is allocated to a 1 bed house in this part of the **Transport Statement**. This gives a total of 64.4 although the author of this report has given 68 as the total.

In the **Transport Statement**, 68 spaces are said to be sufficient for both residents **and** visitors. This total does not conform to the **Parking Standards SPD**, quoted *in this very document* at 3.3.10).

Close attention should be paid to the **Highways and Parking Plan**. There are 68 allocated spaces and just 2 unallocated spaces. According to the **Parking Standards SPD**, there should be 20% unallocated parking spaces. This means that there should be 14 unallocated parking spaces in total. Where are the other 12? Presumably, people would park on the road but where? The houses are so densely packed that the only options are:

- Block someone's driveway;
- Park in the space intended for turning;
- Park on a blind bend;
- Park on the very narrow access road; or
- Park on Antrobus Close or Oakdene Crescent which are both blighted by parked cars.

In addition, some of the houses have been designed with car parking spaces laid out tandem style. Some have two spaces and two of the properties have three. These are extremely inconvenient and lead to yet more on-street parking.

Furthermore, in the **Design and Access Statement**, page 14, below, it states that there are no allocated spaces for the maisonettes when the legend to the **Highways and Parking Plan** states that there are 8 (although only 4 are shown on the map).

Conclusion:

- **There are a concerning number of discrepancies across - and within - several documents regarding the number of car parking spaces.**
- **The Highways and Parking Plan demonstrates that there are too few unallocated parking spaces, leading to inappropriate on-street parking.**

8. DESIGN AND ACCESS STATEMENT, UMAA ARCHITECTURE, MAY, 2024

This report contains inaccuracies and inconsistencies: note the late date of submission. In common with other reports, it appears to have been completed as a desk exercise without a site visit.

A concerning aspect of this report is that it does not address the fact that a large part of the site is “made ground” and allegedly unstable. How will the different levels be addressed?

4. Design Development

Development within the site has been carefully laid out in order to form a back-to-back arrangement to existing neighbouring properties to the west in order to maximise separation distances to existing neighbours.

The design does nothing of the sort. It has **minimised** the separation distance, especially as the proposed houses are provided with such tiny gardens.

In keeping with the pattern of surrounding development within the village, all new dwellings have been treated either as detached or semi-detached houses, or arranged into small terraces with no more than three dwellings.

According to the site plan, there are no detached houses. The majority are terraced which absolutely does not fit in with the surrounding area as demonstrated earlier.

A further point is that the houses at 9-15 Antrobus Close all have back gates onto the site. These gates have been in use for decades and certainly long enough in some cases for residents to have acquired prescriptive easement rights. This is particularly crucial in the case of number 14, Antrobus Close. Without rear access, the residents will be unable to have to have oil delivered as oil companies refuse to access oil tanks via living accommodation.

5. Access Statement

The architects refer to “The Principles of Inclusive Design”, including the statement that:

Inclusive design acknowledges diversity and difference.

It is difficult to not be cynical about this declared aim. The accommodation does not appear to take account of older people or the disabled (other than trying to avoid stepped access). Where are the bungalows?

6. Conclusion to this report.

*The proposal will be well suited to its location in an area of predominantly residential character, extending the existing village with **minimal impact to neighbouring properties**. [our emphasis]*

Residents are expected to exchange wildlife and wildflowers for 34 poorly designed houses with all the attendant issues, namely:

- Vastly increased noise, particularly from loud music and vehicle movements;
- Light pollution from street lighting (which also affects wildlife, notably bats);
- Increased traffic danger;
- Inappropriate parking;
- Loss of privacy;
- Loss of access to the rear;
- Predation of wildlife by pets.

Conclusion

- **The design does not address the key issue of the different levels of the site;**
- **It does not pay any regard to the elderly or disabled;**
- **It interferes with the rights of access gained by residents and leaves no.14 Antrobus Close unable to receive oil deliveries.**
- **It completely ignores the devastating impact on local residents.**

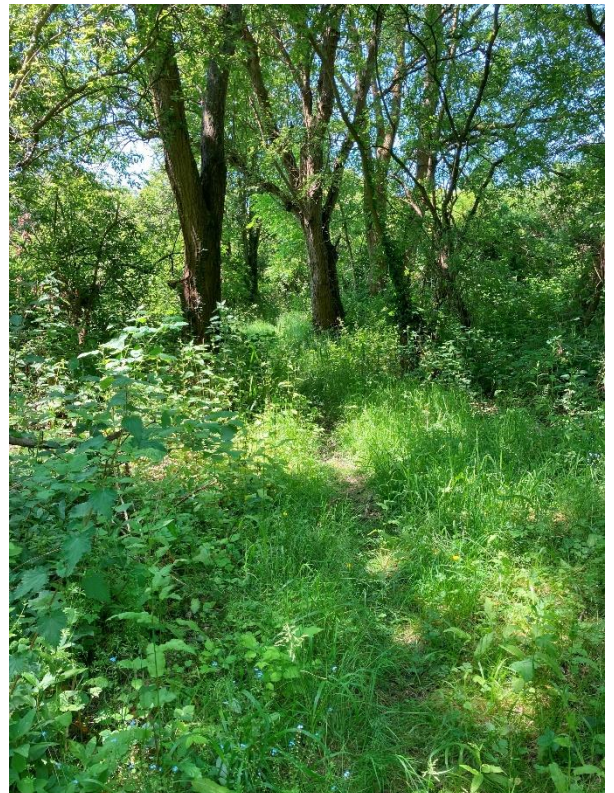
APPENDIX A: PHOTOGRAPHIC EVIDENCE IN SUPPORT OF THIS OBJECTION

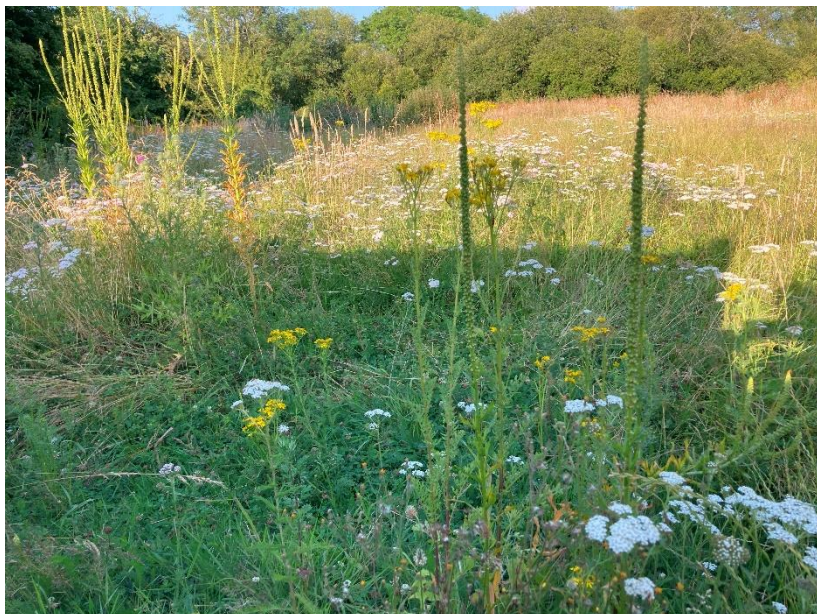
SECTION 1: This is not a Brownfield Site

The photographs below were taken in the spring and early summer:



This area has completely rewilded itself. There is no evidence that this site once had part of a track on it. (See black and white photo below)





SECTION 3: OBJECTION 8: The site is contaminated and the recommendation to have the site investigated for possible leftover munitions does not appear to have been carried out.

In addition, there are significant changes in level to overcome and the “made ground” has been found to be unstable. The Full Planning Application is silent on the question of how this will be resolved.



This shows the site at the end of its time as a munitions depot. It is looking west with the railway line just visible on the right hand side.

In the distance, is one of the Nissen huts. This photo confirms evidence from aerial photographs that the site did not contain a building. The only buildings were the Nissen huts and they lay under what is now Antrobus Close, Ash Close and Oakdene Crescent.

The area is littered with munitions, some or all of which were allegedly left on site.

It further shows that an area on which the developers would like to build is “made ground”, presumably levelled to facilitate the movement of munitions around the site.

This photo also shows the track visible in one of the pre-1970s photos. It is narrow and does not look like it was intended for vehicles. Trolleys perhaps? It also looks temporary in nature.

The important point is that there is not a single trace of the track visible today.



This is the track (marked in orange on the site plan below) which leads from the entrance to the site. To the left, the bank is the edge of the “made ground”. Whereas the track slopes downwards towards the stream, the “made ground” is relatively level, meaning that the height of the bank increases significantly the further east you travel.

The photograph does not adequately convey just how high the bank becomes. It is certainly above head height where the track can be seen curving around to the left.



The orange line corresponds to the track in the photograph above. It can be seen how the houses relate to the abrupt change in level.

OBJECTION 10: Poor connectivity. Hatton Station will not support increases in traffic, particularly construction traffic and other large vehicles.



A pinch point outside the Banana Moon Nursery, Station Road, Hatton Station. Note that this is a still image from a video. Footage is available on request.

The school bus negotiating the railway bridge. Note that there is no pavement and that the recently installed high kerb stones have further reduced the refuge for pedestrians.





This is on Station Road going towards Hockley Road. The important point is that the bus is emerging from a blind bend whilst taking up most of the road. This is a common problem for pedestrians, cyclists and horse riders. Note the steeply banked sides to the right and the lack of verge on the left.

This is the view towards the canal bridge. The entrance to the station on the right. Station House is the brick - built building on the right. This shows both the narrowness of the road and the poor visibility to the right for traffic emerging from the station.





This was taken in the entrance to the station and shows the poor visibility to the left. Note also the lack of pavement or verge.

Real Rail and Bus Timetables

Note that the Transport Statement quotes direct train times and so only direct times are considered in Section 4 of the objection.

Trains

There is a notice on the station noticeboard stating that there are no replacement bus services if the trains are not running due to “poor road access”.

Only the Monday to Friday timetables are supplied as the primary use for the railway would be for commuting.

Hatton to Leamington Spa

This table is valid from Saturday 3 August 2024 until Sunday 25 August 2024
Correct as of 03-08-2024

Monday to Friday 1 of 1

Operator		CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	LM	CH	CH	CH	CH	LM		
Hatton	HTN d	0654	0744	0852	0943	1052	1139	1251	1339	1452	1539	1656	1706	1744	1806	1851	1926	1940	2144	2156	2244	2357		
Leamington Spa	8 LMS d	0705	0757	0903	0955	1103	1154	1302	1354	1503	1554	1707	1720	1756	1819	1902	1943	1954	2156	2207	2258	0007		
Service Continues To												MYB			MYB			MYB			MYB		BAN	

Notes & Symbols

- CH** Service operated by Chiltern Railways
- LM** Service operated by West Midlands Trains
- a** Arrival time
- d** Departure time

Hatton to Stratford Upon Avon

This table is valid from Thursday 18 July 2024 until Sunday 11 August 2024
Correct as of 18-07-2024

Monday to Friday 1 of 1

Operator		CH	CH	CH	CH	CH	CH	CH
Hatton	HTN d	0952	1152	1352	1553	1752	1952	2239
Stratford Upon Avon	SAV d	1013	1213	1413	1614	1813	2013	2300

Notes & Symbols

- CH** Service operated by Chiltern Railways
- a** Arrival time
- d** Departure time

Hatton to Birmingham Moor Street

This table is valid from Thursday 18 July 2024 until Sunday 11 August 2024
Correct as of 18-07-2024

Monday to Friday 1 of 1

Operator		LM	LM	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH
Hatton	HTN d	0556		0638	0712	0817	1017	1217	1417	1617	1818	2014	2244
Lapworth	LPW d	0601	0630										
Birmingham Moor Street	BMO d		0656	0703	0736	0844	1044	1244	1444	1644	1844	2043	2310
Service Continues To		WOF	WOF					BSW			BSW	SBJ	

Notes & Symbols

- LM Service operated by West Midlands Trains
- CH Service operated by Chiltern Railways
- a Arrival time
- d Departure time

Hatton to London Marylebone

This table is valid from Thursday 18 July 2024 until Sunday 11 August 2024
Correct as of 18-07-2024

Monday to Friday 1 of 2

Operator		CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH	CH		
Days of operation/Notes																					MFX		
Hatton	HTN d	0654		0744		0852		0943		1052		1139		1251		1339		1452		1539		1706	1806
Warwick	WRW d	↓		0750	0814	↓						1147	1214	↓		1347	1414	↓		1547	1614		
Leamington Spa	8 LMS d	0705	0720			0903	0921	0955	1023	1103	1121			1302	1321			1503	1521				
Banbury	BAN d		↓				↓								↓				↓				
Oxford	OXF d																						
High Wycombe	1 HWY d																						1916
Reading	7 RDG d																						
London Paddington	15 PAD d								↓														
London Marylebone	10 MYB d		0842	LMS	0945		1045		1145		1243	LMS	1343		1443	LMS	1543		1648	LMS	1744	1844	MYB

Monday to Friday 2 of 2

Operator		CH	CH	CH	XC	GW	+	CH	GW	GW	+
Days of operation/Notes											FX
Hatton	HTN d		1940	2156				2244			
Warwick	WRW d										
Leamington Spa	8 LMS d			2207	2238						
Banbury	BAN d							2323	2334		
Oxford	OXF d								0001	0010	
High Wycombe	1 HWY d	1917									
Reading	7 RDG d				2338	2348					
London Paddington	15 PAD d					0027	0042		0115	0130	
London Marylebone	10 MYB d	1943	2130	MYB			MYB				MYB

Notes & Symbols

- CH Service operated by Chiltern Railways
- XC Service operated by CrossCountry
- GW Service operated by Great Western Railway
- a Arrival time
- d Departure time
- +
- Transfer
- MFX Not Mondays and Fridays
- FX Not Fridays

Source: National Rail Enquiries website

Buses

Note that the nearest stop is Shrewley Crossroads. This can only be accessed by Station Road which cannot be considered a **safe** walking route.

24 hours' notice needs to be given for the bus to come to, and return, to Hatton Station.

Currently, there are two buses per week – Mondays and Saturdays.

Flexibus	A&M Group,	Leamington Spa, Warwick, Hatton Park, Hatton, Little Shrewley Crossroads,	✓	✓	view
514	Coventry Minibuses	Shrewley Common, Rowington, Lapworth, Baddesley Clinton, Chadwick End, Knowle, Solihull			

Source: *Warwickshire County Council Website*

The timetable below shows that there is only one bus per day.

LEAMINGTON UPPER PARADE	1010	SOLIHULL POPLAR ROAD	1405
Leamington Parish Church	1014	Knowle Green	1415
WARWICK BUS STATION	1032	Chadwick End opp. Orange Tree	1421
Hatton Park Charingworth Drive	1040	Baddesley Clinton	1423
HATTON GREEN	1045	Lapworth Old Warwick Road / Station Road	R
Little Shrewley Crossroads	1048	ROWINGTON CHURCH	R
Hatton Railway Station		Shewley Common Crossroads	R
Shewley Common Crossroads	1050	Hatton Railway Station	R
ROWINGTON CHURCH	1053	Little Shrewley Crossroads	R
Lapworth Old Warwick Road / Station Road	1057	HATTON GREEN	R
Baddesley Clinton	1103	Hatton Park Charingworth Drive	R
Chadwick End Orange Tree	1104	WARWICK BUS STATION	R
Knowle Green	1110	Leamington Parish Church	R
SOLIHULL POPLAR ROAD	1120	LEAMINGTON UPPER PARADE	R
CODES: ☎ Telephone booking required from this point R - Calls on request			

Source: *Flexibus website*

This service works for an occasional day out but certainly not for commuting, attending school or a specific appointment.



83490/34300/37/7134

Railway Neighbour

Hatton
WARWICK
CV35 7BW

One or two nights of disruption is more usual but this letter gives an indication of how unpleasant it can be. Bear in mind that the houses planned along the base of the railway embankment would be severely impacted.



Community Relations
Baskerville House
Centenary Square
Birmingham
B1 2ND

July 2024

Dear Neighbours,

NOISY OVERNIGHT WORK - HATTON - Ref: DCL 112m 11yds – 112m 55oyds

Network Rail is due to start work near your property, and I wanted to give you some more information about the times we will be working and what the project will involve.

Our teams will be replacing Timbers that support the tracks to maintain a safe railway. This maintenance will assist in keeping the train services reliable for passengers.

To complete this work, we will be using heavy Machines, lighting, and hand power tools.

I'm sorry, this may cause some noise disturbance. We'll try to keep disruption to a minimum.

Work will take place over night for 4 nights from

00:55 Tuesday 13 August - 05:15 Friday 16 August

Our staff will access the track through **Hatton Station Off Station Road – CV35 7LE**, so you may notice increased activity here.

For more detail, please visit <https://www.networkrail.co.uk/communities/living-by-the-railway/>.

Please call **03457 11 41 41** if you have any further queries and we'll be happy to hear from

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Delroy Hall".

Delroy Hall
Community Relations Executive