

## 1. EXECUTIVE SUMMARY

2. The focus of this representation is on transport issues. National, Local and Neighbourhood Plan Policies give priority to the provision of cycling and walking routes. Whilst the brief does make reference to this the detailed requirements set out in the document demonstrates it that the car has in fact been given precedence. This is unacceptable and contrary to policy.
3. It is essential that the needs of walking and cycling are given priority with relevant infrastructure provided at an early stage of the development so that new residents get into the habit of not using the car because there are attractive alternatives.
4. There is a complete failure to analyse in detail what routes exists and what can be done to make them safe and attractive. This means that the Draft Design Brief cannot be used as a basis for a successful, sustainable development.
5. NB *Quotes from the Draft design Brief are in Italics*

## 6. INTRODUCTION

7. The focus of this representation is on transport issues more particularly the provision of cycling and walking routes. It is absolutely fundamental to ensure that these two modes of transport are given priority. The range of benefits is enormous. There is the simple point in reducing the visual impact of more roads to cater for more vehicles to the detriment of urban design. Less traffic means less green house gases and other pollutants. This improves air quality and health outcomes. The health benefits are as important. Warwickshire County Council in their document Healthy Travel choices in Warwickshire state "Walking and cycling are accessible, cheap and non polluting forms of active travel with many positive benefits for physical and mental health"( page 5). The National Institute of Clinical Excellence has produced a consultation paper, Physical Activity: Encouraging activity in the general population." Statement 2 in this document is "Local authorities develop and maintain connected travel routes that prioritise pedestrians, cyclists and people who use public transport." (see <https://www.nice.org.uk/consultations/50/1/quality-statements> )
8. Therefore transport is not just about how people and goods move about but has implications for health, urban form, air quality and climate change.
9. Before considering the transport issue in more detail there are a number of general points.

## 10. Kenilworth Neighbourhood Plan

11. The Kenilworth Neighbourhood Plan (KNP) has now been 'made' and is therefore part of the Development plan. The statement in the last paragraph on page 25 is incorrect where it states the KNP, "*will be afforded significant weight in the determination of planning applications.*" As

part of the development plan “determination must be made in accordance with the plan unless material considerations indicate otherwise.” In this context in Chapter 7 of the Brief where “Relevant WDC Policies” are listed needs to be amended to read Development Plan Policies with relevant policies from both the Local Plan and Neighbourhood Plan included.

## **12. A Sustainable Urban Extension?**

13. The front page to the Introduction (page 6) states the development will be a ‘*sustainable urban extension*’. Unfortunately although there are numerous policy statements the actual details of the Development Brief fall short of what is needed to ensure that the proposed development will be genuinely sustainable.

## **14. High Quality**

15. The introduction to Chapter 1 (page 6) states “...*Land East of Kenilworth presents a significant opportunity to deliver a high quality new community...*” The only definition of high quality I have found is on page 7 which states, “The overarching aim of a Development Brief is to secure a higher standard of development than would have been achieved without it. This is a very nebulous definition against which it will be impossible to measure success. Unless a clear definition of high quality the phrase should be deleted from the document as misleading and meaningless.

## **16. Consultation**

17. It is noted at page 6, paragraph 2 that the District Council “...*has undertaken extensive consultation with key stakeholders including ....landowners and land promoters.*” It should be noted that the interests of these two groups are almost certainly at variance with the interests of the people of Kenilworth who will have to live with the consequences of the development. I trust that there will be a more active engagement with the people of Kenilworth.

## **18. TRANSPORT ISSUES**

19. The focus of this representation is on the transport issues and how the development will be properly linked into the existing town. It highlights a major shortcoming of the document although it seeks to promote walking and cycling the actual policies and implementation is focused on detailed improvements to the road network with very little on the practical requirements to make a success of encouraging people to walk and cycle.

20. The overall aim is firmly stated on page 12 para. 3” *It is therefore critical that the development is appropriately integrated into the existing town, is suitably designed and provides the infrastructure required to meet the demands of the new development.*” This reflects the Local Plan at para 2.61 which includes the need for the new development to be “properly integrated into the area” Page 35 in the last paragraph reinforces this point by stating “*It will therefore be*

*necessary to encourage other means of transport such as cycling and walking to limit the strain put on the existing infrastructure.”*

21. Given the need to minimize the use of the car and promote cycling and walking it is essential that the development brief provides a clear analysis of the problems with solutions to be achieved as part of the development process. This needs to be implemented early in the development so that new residents get into the habit of walking and cycling for local journeys rather than using the car.
22. Unfortunately there is no comprehensive analysis of such routes and therefore no solutions are provided.
23. There is limited analysis is on page 36 which states
  - 23.1.1. *“The street pattern in Kenilworth lends itself to good north-south connectivity. However, the street pattern on more recent development to the east of the town, a lack of good wayfinding and the railway line all act as barriers to east/west movement for pedestrians, cyclists and vehicles. The railway line runs through the middle of Kenilworth and severs east Kenilworth from west Kenilworth and the town centre. It will therefore be necessary to re-establish severed east/west links where possible and improve east-west connectivity in the town.”*
24. It is essential that walking/cycling routes into the centre should be by the shortest routes to ensure that the statements listed below are fulfilled and are not vague promises.
25. page 54 para 5 *“However, the development affords the opportunity to enhance pedestrian and cycle routes east-west and improve wayfinding.”* And on page 57 *“The new community will be **fully integrated into the existing town** and well connected to neighbouring settlements through appropriate highways infrastructure that encourages the safe and free flow of traffic, supports sustainable travel and use of public transport, and **through a design and layout that encourages and promotes pedestrian and cycle movement** and connects the site to existing routes. ”* which is part of This latter statement is part of ‘The Vision’ and to ensure it is not a pious wish but a policy that will be implemented the draft Brief needs revising. (bold is my emphasis)
26. In this context Objective 3 on page 65 does not give the right priority. It states
  - 26.1.1. *Objective 3: To deliver an effective and efficient transport system allowing the safe movement of traffic, appropriately designed and located walking and cycling routes and public transport connectivity.*
27. The Local plan and KNP give a clear lead that walking and cycling should be given priority. The objective should be rewritten
  - 27.1.1.1. To deliver a sustainable transport system that gives priority to walking and cycling links with good public transport connectivity.

28. Relevant Policies from the Kenilworth Neighbourhood Plan which should be referenced include KP2, KP4, KP8 and KP9
29. It should be noted that there is a clear link between this objective and Objective 6 *“Promoting a healthy and safe community”*. By promoting walking and cycling this has clear health benefits as well as reducing pollution from vehicles. All these benefits are contained in Warwickshire County Council’s document ‘Healthy Travel Choices in Warwickshire’.

### 30. Priority

31. Given the need to ensure that this is a genuinely sustainable development it is surprising that emphasis and a lot of work appears to have been devoted to ensuring the free flow of traffic and little practical work on improving pedestrian/cycle routes. An example of this is Page 65 which states
- 31.1.1. *“This section identifies existing capacity constraints on the local highway network that are relevant to the development and makes recommendations about how these may be mitigated as well as identifying other key highway infrastructure required.”*
32. There then follows details for numerous junction improvements. There is no similar analysis for the constraints that apply to walking and cycling.
33. The top of page 66 continues this same theme with the statement,
- 33.1.1. *“The development should prioritise wherever practicable continuity, accessibility and permeability by active travel modes (pedestrian and cycle movements) to ensure that this is more convenient and attractive than using a car.”*
34. What does the word “practicable” mean in this context? Continuity of walking and cycling links is absolutely essential. One break in an otherwise excellent link is sufficient to deter most people from using such links.
35. How is the following statement on page 66 to be effectively implemented?
- 35.1.1. *“To promote sustainable travel, a comprehensive cycle network will be required to serve the new development, connecting the site to key destinations within Kenilworth and neighbouring settlements. The Kenilworth Cycle Network Plan (Figure 24) has been developed to provide a comprehensive plan for cycle connectivity within Kenilworth setting out a number of indicative routes with the aim of providing convenient and attractive links to key destinations including the town centre, railway station, schools, employment sites, leisure facilities and the wider cycle network.”*
36. This is followed on page 67 with references to what improvements may be made including the statement , *“Enhancements to the crossing points over the railway line, which currently create a barrier to east-west cycling movement”* but nowhere does it state what those enhancements will be or a time scale. This is absolutely critical for the whole cycling/walking strategy. The alternative routes for cyclists either involve negotiating St John’s roundabout or over the railway

at Whitemoor Road and since Station Road is one way if they wish to go to the town centre this means a longer route via Abbey Hill.

37. Without this comprehensive, detailed approach to the provision of high quality walking and cycling routes can the aspiration on page 70 be achieved?<sup>1</sup>

### 38. Junction Improvements

39. Listed below are the junction improvements proposed which yet again serves to illustrate the point this is a traditional approach to traffic management which completely fails to respond to policy requirements and the need expressed in the document for a sustainable development.

40. Proposed access to Employment Site (Page 73)

41. When considering the access arrangements to the proposed employment site there is no mention how this will link to the proposed K2L cycle route. At the bottom of page 73 is the statement *“that it should be possible to provide Toucan crossings at the junction linking the shared footways/cycleways on the spine road with the proposed shared footway/ cycleway on the south side of Leamington Road.”* The words *“should be possible”* speak volumes for the low priority being given to walking and cycling.

42. Crewe lane/Glasshouse Lane/Hidcote Road (page 76)

43. It is not clear how the layout improves *“pedestrian and cycle provision”* The proposed No Entry signs mean that cyclists will have to find a long way round to reach their destinations. How the proposal improves visibility at the junction is not explained as it is the vertical alignment of Glasshouse Lane that is the critical issue. This problem could be resolved by making Hidcote Road to Crewe Lane the priority route.

44. Spine Road/Glasshouse lane/Heyville Croft junction (page 80)

45. A roundabout is proposed without any provision for cyclists.

46. Glasshouse Lane and Northern Spine Road section junction (page 81)

47. A roundabout is proposed without any provision for cyclists.

48. St John’s Gyrotory (page 86)

49. The focus here seems to be getting as much traffic through this junction as possible. There is a statement that this *“would allow for increased opportunities to provide controlled pedestrian*

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<sup>1</sup> “It is of critical importance to the success of the development that appropriate on and off-site highways infrastructure is provided to serve and meet the demands of the new development and ensure there is no significant adverse impact upon the safe and free flow of traffic in the town.”

*and cycle crossing points.*” What does this mean in practice? Given that this junction provides access to Leek Wootton and Rouncil Lane it is essential that cyclists are given a safe route through. How is this to be achieved?

50. Dale House Lane/Knowle Hill

51. What is meant by the statement at the bottom of page 87 that it will improve ‘*pedestrian and cycle connectivity*’. This junction is a link between the development site and cycle route 52. There are no proposals to improve this link for cyclists which is a wasted opportunity.

52. Leyes Lane realignment.

53. Given that this is a key link to the new school site where getting school children into the cycling habit is vital this has to be the most preposterous scheme in the document. The objective of this scheme seems to be to maximize traffic flow through the junction. The objective must be how do we maximize the arrangement of this junction to make it attractive and safe for cyclists as part of a comprehensive approach to walking and cycling.

54. Masterplan Design Principles

55. Page 140 has a list of principles including, “Ensuring the necessary infrastructure to encourage walking and cycling as part of people’s daily routine” and “*Connecting the site with the existing town and surrounding countryside*”. Page 144 Fig 56 purports to show Pedestrian and Cycle Connectivity. However this just shows the existing situation.

## **56. Conclusion**

57. This document fails to provide a successful basis to ensure that cycling and walking become the transport mode of choice. It is a traditionally based car dominated analyses with solutions based on that skewed analysis.

58. It fails completely to ask the question, how we get new residents out of cars. Not having asked the question it cannot provide the answer.