

Kenilworth All Together Greener's submission to the consultation on the Warwick District Council's Draft Development Brief for Land East of Kenilworth

EXECUTIVE SUMMARY

This representation is the work of Kenilworth All Together Greener (KATG), a community interest group which was involved in the preparation of The Kenilworth Neighbourhood Plan. (See Appendix A).

This Land East of Kenilworth is the first major extension of Kenilworth for over 30 years. It is therefore an opportunity for ensuring that Kenilworth becomes a genuinely sustainable town. This requires the integration of the new with the old in a manner that will be fit for the 21st century. The document highlights the need for integration but then fails to demonstrate how this will be delivered in a sustainable manner.

The phrase 'high quality' is liberally used through the document but not defined in a meaningful way. If the development is genuinely to be sustainable then clear criteria such as build quality must be set down.

We note there appears to have been detailed consultation with some stakeholders but this consultation is the first time the residents of Kenilworth have been involved. We look forward to working with WDC to develop a document that will meet the aspirations both of new residents and the needs of the existing town.

NB: *Quotes from the Draft Development Brief are in italics.*

INTRODUCTION

This representation examines in detail the Land East of Kenilworth Development Brief making comments on each chapter. However there are a number of general points we wish to make.

Kenilworth Neighbourhood Plan

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 that the KNP "*will be afforded significant weight in the determination of planning applications.*" As it is 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, the text needs to be amended to read "Development Plan Policies" and relevant policies from both the Local Plan and Neighbourhood Plan need to be included in this listing.

A Sustainable Urban Extension?

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.

High Quality

The phrase 'high quality' is used throughout the document but not in any meaningful way. As an example 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 on page 7 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 which is only achievable if specified measurable standards are set, and they are not.

It is essential a clear definition should be included for 'high quality' wherever it occurs or the phrase should be deleted from the document as misleading and meaningless.

Consultation

It is noted at page 6, paragraph 2 that the District Council "...*has undertaken extensive consultation with key stakeholders includinglandowners 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 and are therefore the most important stakeholders of all.

In the WDC document "Garden Towns, Villages and Suburbs A prospectus for Warwick District Council May 2012" it states, "The Prospectus has been prepared to encourage active engagement and participation by community groups,"(Page 23). We look forward to being actively involved in helping develop this document so that it becomes a firm basis for a sustainable future.

Chapter 1 Introduction

The introduction correctly states that this is a unique opportunity for the delivery of a sustainable urban extension to the eastern side of Kenilworth. However, it is our view that the Development Brief as it stands will not lead to a genuinely sustainable extension. (e.g. note on 'high quality' above).

Within this section '**Has the Brief been informed**' (p.13) lists with whom many discussions have taken place. We see no mention of other relevant significant bodies such as Warwickshire Wildlife Trust, the Town and Country Planning Association, The Prince's Foundation etc. Nor is there any mention of other communities where successful sustainable urban communities have been developed e.g. North Bicester.

Chapter 3 Planning Policy Framework

This chapter starts with the statement that the Government published a revised NPPF in July 2018. This framework establishes planning principles which should underpin both plan-making and decision-taking. We are delighted that the July 2018 NPPF is referenced.

Following the consultation on updating the National Planning Policy Framework and lobbying by the UK Green Building Council (UKGBC), the government's summary response has clarified that councils can once again set energy efficiency standards for new homes which go above and beyond the building regulations (Part L). This clarification can be found at:

<https://www.ukgbc.org/news/government-confirms-local-authorities-can-set-energy-standards-beyond-part-l-in-nppf/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf p48 of this

This clarification associated with the 2018 NPPF enables the effective implementation of Policy KP15 which seeks to encourage applicants to adopt higher environmental standards of building design and energy performance such as Passivhaus or equivalent. This ambition and indeed reference to KP15 should be evident within Chapter 3 but are missing.

Chapter 5 Site Analysis, Constraints and Opportunities.

We are pleased to see the following in the document:

“In particular, development proposals should seek to:

- Retain and minimise the impact on green/blue infrastructure and utilise this in the greenspace and drainage strategies for the site*
- Retain existing pedestrian/cycle connectivity and create opportunities for improved connectivity with the town and adjacent countryside*
- Minimise the impact of the A46 on new development by locating new housing away from the road, providing noise attenuation and introducing screen planting to reduce its visual impact*
- Retain and minimise the impact on existing historic assets whilst providing opportunities to enhance their setting and afford them greater protection*
- Retain and minimise the impact on wildlife sites and provide new additional habitats and associated connectivity*
- Minimise the impact on existing residential properties.”*

There is also a later statement on page 55:

“Detailed development proposals will need to retain habitats where possible and mitigate any impact upon ecology.”

However minimizing the impact on green / blue infrastructure and on wildlife sites, and retaining habitats where possible, does not equate to KP4(l) which calls for an environmental strategy to establish how the development of land will deliver a **net biodiversity gain**. A requirement for the development of such a strategy is missing from the document.

We are also pleased to find that the noise and air quality issues associated with the A46 are mentioned:

“The heavy usage and speed of traffic on the A46 result in noise and air quality issues potentially affecting the site, in particular eastern areas. Suitable noise attenuation will be required in the form of noise bunds or acoustic fencing whilst dwellings will also have to be located away from the eastern edge of the site to combat the impact of poor air quality.”

However, setting aside the fact that a housing development of this size should perhaps not be constructed on this site at all due to the hazards of air quality and indeed noise on the

occupants, we note that there are no recommendations as to how close to the A46 houses and gardens should be.

We would point out that with respect to noise and noise attenuation, the Passivhaus approach to construction ensures a better quality of life for house occupants thanks to its high levels of insulation and low air/noise permeability.

Chapter 6 – Vision and Objectives

We do not feel that this vision fits with the vision for Kenilworth as set out in the Kenilworth Neighbourhood Plan.

Mention is made of affordable housing but there is no reference to social housing or indeed custom and self build housing in the vision. For example, KP4 (e) states that there should be provision of open market homes as self-serviced plots for self-build and custom build not exceeding 5% of the total number of dwellings. There is of course the proviso in this policy that this build is commensurate with the demand evidenced on the local authority self-build register of interest. However, if this is not advertised as part of the vision and objectives how are people to know of this opportunity?

The Vision refers to “*high quality sustainably designed buildings*” however, once again there is no definition of what this means. As stated previously, KP15 seeks to encourage applicants to adopt higher environmental standards of building design and energy performance such as Passivhaus or equivalent. It goes on to say that the public sector has an important role to play in demonstrating the practicalities and the long-term benefits of adopting high environmental building standards. To comply with this policy it will be necessary for applicants to go beyond the current 2013 building regulations, yet such a suggestion is absent from the ‘vision and objectives’ for the development area.

With regard to the environment, we question how the vision statement relating to the removal of existing mature landscaping and woodland can enhance the development? (Blue box on p.57.) KP4 (I) calls for an environmental strategy to establish how the development of land will deliver a net biodiversity gain. Any requirement for the development of such a strategy is absent from the document.

Lastly there is nothing in the vision and objectives about how to counteract the noise and air pollution from the A46.

Chapter 7 Development Principles

The opening statement that the development principles are based on the vision and objectives of Chapter 6 does not inspire confidence when starting to read this 80 page chapter.

On page 60 the Brief states that the Development Principles have been informed by various discussions. Given the reference in the Introduction to the “*development of a sustainable urban extension*” have examples of other such developments been studied – both ones that have worked and ones that have not? Have any discussions taken place with leading communities both in the UK and Europe as to how they have managed to develop more sustainable

communities? We are thinking here of the likes of Malmo, Freiberg and closer to home at North Bicester.

Comments on the Objectives:

Objective 1B Custom and Self Build housing.

We are pleased to see that self-build and custom-build housing feature in various paragraphs and are highlighted in a brown box. Reference is also made to the 5% requirement within KP4. The principles laid down in the brown highlighted box are broadly appropriate. However, there is no specific mention of the potential for small bespoke developers who in general build higher quality housing with performance-in-use standards, members of the Good Homes Alliance for example. It is small developers/builders like these who construct the majority of housing in mainland Europe, but their counterparts in the UK cannot compete with the large developers who buy large tracts of land to build hundreds of houses.

We would therefore advocate that the WDC advertise the fact that sites for this type of development will be available for both individuals and for small bespoke developer/builders.

Development Principle 2: Employment Land.

We note that contained in the brown highlighted box is the statement: : “f) *Buildings shall be of high quality design.....*” Can a definition of high quality design be provided? We advocate that building to the out-dated 2013 building regulations is most certainly not high quality, consequently WDC needs to make its ambition clear to the developers.

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

This section 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.

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.”*

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 along with solutions to be implemented as part of the development process. This needs to be provided early in the development so that from the outset new residents get into the habit of walking and cycling for local journeys rather than using the car.

Unfortunately there is no comprehensive analysis of such routes and therefore no solutions are provided.

The only real analysis is on page 36 which states

“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.”

Agreed, but it is essential that walking/cycling routes into the centre should be by the shortest and most direct routes to ensure that the statements listed below are fulfilled and are not just vague promises.

On 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. ”* This latter statement is part of ‘The Vision’ and to ensure it is not just a pious wish but a policy that will be implemented the draft Brief needs revising. (Bold is our emphasis.)

In this context Objective 3 on page 65 does not give the right priority. It states:

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.

The Local plan and KNP give a clear lead that walking and cycling should be given priority. The objective should be rewritten:

‘To deliver a sustainable transport system that gives priority to walking and cycling links and good public transport connectivity.’

Relevant Policies from the Kenilworth Neighbourhood Plan which should be referenced include KP2, KP4, KP8 and KP9.

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’.

Priority

Given the need to ensure that this is a genuinely sustainable development, it is surprising that much emphasis and a lot of work appears to have been devoted to ensuring the free flow of vehicular traffic, while little practical work has been done on improving pedestrian/cycle routes. An example of this is Page 65 which states:

“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.”

There then follow details for numerous junction improvements. There is no similar analysis for the constraints that apply to walking and cycling. Why not?

The top of page 66 continues this same theme with the statement,

“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.”

What does the word “practicable” mean in this context? Continuity of walking and cycling links is absolutely essential. One break in an otherwise excellent linked route is sufficient to deter most people from using it.

How is the following statement on page 66 to be effectively implemented?

“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.”

This is followed on page 67 with a listing of improvements that may be made. These include: *“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 give a time scale for them. This is absolutely critical for the whole cycling/walking strategy. The alternative routes for cyclists involve either negotiating St John’s roundabout or crossing over the railway at the Whitemoor Road bridge, and since Station Road is one way, if they want to go to the town centre this means taking a longer route via Abbey Hill.

Without this comprehensive, detailed approach to the provision of high quality walking and cycling routes, how can the aspiration of Development Principle 3A on page 70 be achieved?

Junction Improvements

Listed below are the junction improvements proposed which yet again serves to illustrate the point this is a traditional and out-dated approach to traffic management which completely fails to respond to policy requirements and the need expressed in the document for sustainable development. Over and over again cycling provision has been forgotten.

Proposed access to Employment Site (Page 73)

When considering the access arrangements to the proposed employment site there is no mention of how this will link to the proposed K2L cycle route. At the bottom of page 73 it states *“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. The words ‘it is essential’ would be more in keeping with the vision and principles.

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

It is not clear how the layout improves '*pedestrian and cycle provision*' (our emphasis). For cyclists the proposed No Entry signs would clearly be detrimental as they would prohibit cyclists from entering Crewe Lane and Hidcote Road. In fact cyclists would be obliged to make very long detours. Interestingly though this indicative layout conflicts with Fig 56 on page 143 which shows Crewe Lane as a cycle route. So clearly one of these must be wrong.

How the proposed scheme improves visibility at the junction is not explained as it is the vertical alignment of Glasshouse Lane that is the critical issue and that would remain unchanged by this layout.

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

A roundabout is proposed without any provision for cyclists.

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

A roundabout is proposed without any provision for cyclists.

St John's Gyratory (page 86)

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 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?

Dale House Lane/Knowle Hill

What is meant by the statement at the bottom of page 87 that it will improve '*pedestrian and cycle connectivity*'? This junction is on the favoured link between the development site and cycle route 52 yet proposals to improve the link for cyclists are missing.

Leyes Lane realignment.

Nowadays schools round the country are looking for ways to keep traffic well away from their sites because of concerns about air pollution and road safety as well as the need to promote exercise for general health. Yet it appears this scheme is designed to do the exact opposite and maximise the traffic flow to the new school. Given the proximity to the new school where getting school children into the cycling habit is vital, this layout needs to be reconsidered with the aim of optimising the arrangement to make it attractive and safe for cyclists. The importance of taking a comprehensive approach to walking and cycling to school cannot be overstated.

Traffic Speed

We welcome the 20mph speed limit which is in accordance with policy KP4(g) of the Neighbourhood Plan. However there is no justification for the spine road to have a 30mph speed limit as all of it goes through the residential area. Merely placing a 20 mph speed limit through the local centre will encourage braking followed by acceleration over short distances.

As Glasshouse Lane will become a road within a residential area it should also have a 20mph speed limit.

Masterplan Design Principles

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*”. Fig 56 on page 144 purports to show Pedestrian and Cycle Connectivity. However this just shows the existing situation: no improvements or enhancements are indicated.

Conclusion

This chapter 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.

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

Design

Objective 4 Delivery of social and community infrastructure to support the new community, with a Local Centre and education facilities at the heart of the community..

We note that the appropriate Kenilworth Neighbourhood Plan policies are missing from the blue highlighted box.

Development Principle 4A: Local Centre and Community Centre.

We are pleased to note the significant detail provided for the configuration of the community centre (page 99). Can similar detail be provided for what a sustainable urban extension might look like...and what high quality design might look like in relation to the new houses?

We note that within the brown highlighted box there is no reference to the design quality of the building. We think there should be.

Design Principle 4: Education.

We are concerned that so little ambition is being shown by WDC in relation to the provision of the two new schools. There is no indication as to the quality of the design of the buildings. With the schools being at the heart of the new sustainable urban extension surely it is up to the public sector to set the brief for exemplar buildings? We would advocate that the buildings be designed to certified Passivhaus standards as this will set the agenda for future generations of children and also provide a message for the various developers looking to build ‘high quality’ housing.

With the location of the proposed new Primary School being set for the central parcel of land, we are concerned that due consideration has not been given to the potential problems of air quality issues from the A46.

Objective 5: Delivery of a high quality environment with a strong sense of place that responds sensitively to and takes advantages of the existing environmental characteristics of the site including green spaces, ecology and heritage assets.

Again, relevant Kenilworth Neighbourhood Plan policies are missing from the blue highlighted box.

Whilst we welcome that the standard of green space has been identified as a primary concern by the Parks and Open Space Audit, we would welcome guidance as to what a high quality environment looks like, with examples of what has been achieved elsewhere, including mainland Europe. Again we ask if this is to be a genuinely sustainable urban extension. We believe this is of importance due to the fact that there are multiple land owners and potentially multiple developers possibly resulting in the generation of a number of smaller disconnected sites. Might there not be examples elsewhere within the UK or Europe where this potential problem has been overcome?

We question whether the WDC 'Open Space SPD (2008) is fit for purpose some 10 years on?

Will due consideration be given to the potential public health issues arising from air pollution and noise from the A46 when planning the development of public open spaces and allotments?

Ecology and Biodiversity: We note that there are three designated Local Wildlife Sites within the site. To ensure that these are considered properly a full biodiversity assessment should have been conducted to inform the Development Brief.

Development Principle 5A: Delivery of green infrastructure, play and recreation provision.

We note within the brown highlighted box that the public open space and play provision will be of 'high quality'. Can examples of this be provided? What will 'high quality' look like?

We also note that applications shall be accompanied with a Biodiversity Impact Plan and this shall set out measures to ensure that there is no overall loss of biodiversity. This negatively expressed statement is at odds with KP4 (I) which calls for an environmental strategy to establish how the development of land will deliver a net biodiversity gain.

There is no mention within the highlighted box of mitigation measures required to protect the health of people while within the green infrastructure areas subject to noise and air pollution from the A46.

Development Principle 5C: Noise.

We welcome this principle although are concerned about the comment that consideration will be given to the financial viability of a solution. We would of course advocate that people's health and wellbeing should come before financial considerations.

Development Principle 5D: Air Quality.

We welcome this principle although are deeply concerned that all detailed air quality assessments should be up to the best international standards. Most AQ assessments fail to measure particulate matter (PMs) and this should be deemed unacceptable as there is no lower 'healthy' threshold for finest particles (PM2.5s) that enter the bloodstream.

It is also a concern that existing AQ assessments on the site (Catesby Homes) rely on modelled data and not monitored data, especially when the sole attempt to validate the modelled AQ shows a significant underestimation of pollution levels. We request that the text is amended to include the need for specific monitoring programmes for nitrous oxides, PM10s and PM2.5s at key locations (e.g. roadside, roundabouts) but especially along transects at right angles to the A46 to assess the distance that the pollution plume extends over the site. The monitoring programmes should run for at least 12 months prior to planning permission consent to enable an assessment of annual cumulative pollution loadings within households.

Given the medical evidence that poor air quality in the UK contributes to the early deaths of up to 40,000 people each year and particularly in view of the emerging risks to children, it is important to pay particular attention to the pollution levels in and around the two proposed schools. We would argue that continuous AQ monitoring should be installed inside all new schools for their lifetime.

We request that estimates for pollution produced by new residents through house heating and driving should be fully quantified and explained. We are advised that current AQ assessments of the projected pollution generation (Catesby Homes) are insufficiently transparent to afford proper interrogation of the assumptions, methods and data used (e.g. how vehicle movements and pollution levels are calculated).

Development Principle 5F: Flood Risk.

There is no mention of the use of green roofs. Yet these can assist with the attenuation of rain water and encourage biodiversity.

Objective 7: Creating a high quality designed quality urban environment.

We question whether the guidance contained within the WDC Garden Towns Villages and Suburbs document (May 2012) is fit for purpose. We query this having viewed the extensive new housing developments to the south of Warwick and Leamington all of which we consider to be of 'poor design'.

We question why it is thought that the local vernacular is appropriate for a 21st century sustainable community. Especially since bricks are not a sustainable building material. One of the drivers of the Government's Clean Growth Strategy is the promotion of off-site construction which uses sustainable materials e.g. timber. This alternative approach is quite capable of delivering a consistent high quality, sustainability and good design as well as the distinctive character cited in Table 4 item 5 (p.121).

We welcome the requirement that the design should include "*Use of sustainable construction materials and construction of energy efficient buildings, utilising zero-carbon or renewable energy technology where applicable.*" However, since an intensive study into new domestic and non-domestic buildings built to 2013 Part L Building Regulations carried out under the Technology Strategy Board/Innovate UK's Building Performance programme (published January 2016) revealed a typical energy use performance gap of between 2.5 and 4 times, we would recommend that WDC clearly quantifies its ambition for energy efficiency and includes this in the Development Brief.

Development Principle 7D: Car parking

We question why consideration has not been given to replicating existing developments where the car is secondary to the street scape allowing residents and children to have access to safe public space. We are thinking here of exemplar developments in the likes of Malmö, Freiberg, many parts of the Netherlands and even to some extent in some exemplar developments in the UK such as Kevin McCloud's first development (HAB Housing) of 41 houses in Swindon.

Development Principle 8 Utilities

We note the comment from Western Power Distribution that the existing primary substation serving Kenilworth has limited capacity. When upgrading is being planned, we consider it essential that consideration is given to the need for additional electricity capacity for the increased take up of Electric Vehicle charging points, air source and ground source heating and the move in general from gas to electricity as a source of power. What consideration is being given to incorporating infrastructure supporting local distributed generation and storage to mitigate centralised supply inadequacies?

Chapter 8 Shaping the Indicative Masterplan

Whilst we welcome the Masterplan Design Principles, we would recommend that specific examples of exemplar developments are included as being 'indicative' rather than cartoon sketches.

We note for example in the Concept Plans – 2 Land use (Figure 54) and Housing Density (Figure 55) that residential areas are shown right up to the edge of the A46. We sincerely hope that this is not indicative.

Chapter 9 Indicative Masterplan and Scale Parameters Plan.

We have two comments to make on the streetscapes. The first is that the developments seem to revolve round the car. This is not appropriate for the 21st century when the street should revolve around walkers and cyclists.

The second comment is that the housing in the streetscapes look mid war – 1920s and 30s, some Victorian. Is this the streetscape that WDC should be putting forward to potential developers? Again we ask if consideration can be given to modern exemplar developments such as Malmö, Freiberg, Netherlands, and more locally, North Bicester?

Chapter 10 Delivery

We understand that this is a high level indicative master plan, however we are of the opinion that it totally lacks ambition and as such gives potential developers the impression that this is anything but a genuinely sustainable urban extension. We believe that this will attract applications of 'anywhere housing' with poor design rather than high quality design.

Monitoring

We welcome the statement that WDC will take a proactive role in monitoring the delivery of dwellings and recommend that this be extended to ensure that the designed energy efficiency of new buildings is also delivered.

About Kenilworth All Together Greener

Kenilworth All Together Greener (KATG) is a group of Kenilworth people who hold monthly meetings at the Kenilworth Centre aimed at providing information, ideas and inspiration about how to live more sustainably. In the last three years speaker topics have included: the energy efficiency of buildings (the Passivhaus standard), building a zero carbon house in Kenilworth; sustainable transport in Kenilworth (cycling and rail); the future of trees in Kenilworth; volunteering for wildlife with the Warwickshire Wildlife Trust; water supply management; local (Harbury) energy efficiency and electric car club; Local Authority energy efficiency initiatives (nationally and regionally) and renewable energy generation (Community Energy Warwickshire and Heart of England Community Energy Coop); as well as talks by two different planning consultants on the planning structure and on neighbourhood plans.

KATG is not affiliated to any political party and its meetings are open to anyone who lives locally. 60-plus Kenilworth residents come to meetings, some more regularly than others. They include adults of all ages, with many retired professionals and some serving councillors, and an even gender balance.

During the preparation of the Neighbourhood Plan the Town Council invited KATG to help develop the sustainability aspects of the document. Over the next couple of years a KATG working party including long-term Kenilworth residents, some with relevant specialist expertise, made several lengthy submissions. Since then this core group has continued to take an active interest in local planning and transport issues.

11.1.2019