



Kenilworth Town Council

Response to “Land East of Kenilworth Development Brief”, Consultation Draft, November 2018

Kenilworth Town Council welcomes the production by Warwick District Council of this very detailed Brief which aims “to deliver a high quality new community within a sustainable urban extension to the eastern side of Kenilworth”. We appreciate the cooperation with the Town Council during the drafting process and particularly the reflection of certain policies in the Kenilworth Neighbourhood Plan.

We are concerned that the sheer size of the document and the need to read online may limit the feedback and comments received from residents, though we appreciate that some notice has already been taken of the relevant consultations during the preparation of the Neighbourhood Plan. The developers will undoubtedly respond in detail and we trust that all the responses will be weighted accordingly. It is unfortunate that the Vision on p57 is not more prominent as it might have encouraged public reaction.

The Council has a number of comments to make which are offered in the spirit of improving the document and ultimately improving the resulting development. It is obvious that much time and effort has been expended in producing the draft and there are various points of detail, many of which are updating the information, which we will comment on using a page by page response. Whilst we accept the urgency required to produce the final document we are equally concerned for a need for redrafting of some sections.

There are four major issues which we will raise first:

1. Overall view and coordination

It is crucial that a holistic view is taken of the whole development, as is indicated on p159. This will affect many issues from location of facilities to housing mix and traffic analysis. We are concerned whether, because of the fragmentation of land ownership and the resulting multiple planning applications over varying timescales, the necessary coordination and cooperation will be achieved despite the hopes expressed.

2. Quality of development

Whilst the Brief seeks in the detailed comments on pp117 to 135 to achieve a suitable quality of build of houses both respecting the local vernacular and achieving high standards of construction, we suspect developers will offer their standard solutions. We seek reassurance that the Brief will carry sufficient weight to manage this issue.

3. Traffic issues

Despite the more detailed analysis of junctions, which now goes way beyond that proffered at Enquiry in Public for the Local Plan, we are still very concerned for traffic issues particularly in Glasshouse Lane and Knowle Hill where the School is proposed and there are several awkward junctions. In particular we suspect that much University and other through traffic will use the southern part of the spine road to reach Common Lane and Crackley Lane. Although beyond the scope of this Brief a holistic view is needed of the effects of all the developments proposed in the town. All these junctions must also make provision for pedestrians, cyclists and other forms of movement.

4. Linking to the existing community

The need to link the new community to the Town is identified in the Brief on p117 but could be expressed more strongly and earlier. We are concerned that there are few indications of how this can be ensured physically whether by foot, cycle, public transport or car. Ultimately of course the links will result from relationships and organisations outside the scope of spatial planning.

Detailed Comments

Page 6 Introduction

This reads as though we are creating a new community distinct from the rest of the town. It is unfortunate that the need to link, in various ways, into the existing community of Kenilworth is not included. We certainly do not want any “gated” communities. This relates to the initial Major Issue 4 above.

Pages 8 and 9 Housing requirements

To make the second paragraph of p8 easier to understand Figure 5 on p9 requires a key to the different colours.

Page 8 Transport links

The third paragraph refers to good public transport links. This is a matter of opinion. This part could usefully refer to the existing high car ownership and the potential effects of this significant additional development.

Page 12 Paragraph 3

The current population of the town is only 23,000 so an increase of 5000 – 6000 will be closer to a quarter than a fifth.

Page 23 Policies DS10 and DS11

To explain the discrepancy between the 1,593 dwellings in DS 10 and the apparent 1,400 in DS11 add the words “among others” after “sites” on the first line of the DS11 paragraph.

Page 25 Supplementary Planning Documents

The reference to the Open Space SPD should now be to the consultation draft Public Open Space SPD dated January 2019. Any subsequent references to quantified requirements (which we have not checked) should now reflect this latest version.

We note that the list does intend to be exhaustive but later in the Brief reference is made to both the Self-Build SPD and the Purpose-built Student Accommodation SPD which could be included.

Page 25 Kenilworth Neighbourhood Plan.

As the Kenilworth Neighbourhood Plan has now been made (16 Nov 18) this paragraph needs to be updated. The second sentence could perhaps read: “The plan was “made” following a referendum in November 2018 and now forms part of...”

Page 29 Strategic Level Movement and connectivity

Although road, rail and cycle are included there is no specific mention of buses and coaches.

There is a typo as connectivity should have a capital letter.

Page 31 Landscape Character Areas

The relevant development guidelines are potentially powerful statements but to carry more weight surely a source should be given?

Page 35 Transport Connectivity

In the first paragraph should it not be admitted that the current railway service is very limited with infrequent trains and no Sunday service.

In the second paragraph the A452 is a “Primary” road rather than “Priority” – a typo?

Page 36 Figure 15 Non-motorised Transport Connectivity

Although this is the current situation it would be useful to emphasise the need to improve cycle links to Leamington (K2L) and the University of Warwick.

Page 38 Figure 17: Heritage Assets

As far as we are aware Wantage is still Wantage and so we do not understand the “formerly” though it is indeed 1 Castle Hill.

Abbotsford School is now a private residence and should revert to the name Abbotsford House.

Page 39 Figure 18: Biodiversity

Abbey Fields has recently been designated a Local Wildlife Site by WCC.

Page 39 Final paragraph

The arboretum along Crewe Lane could usefully be added here, although it is mentioned later in the Brief on p45.

Page 41 Social Infrastructure

Whilst we appreciate the impossibility of covering every aspect of social infrastructure the list does appear to favour educational and sporting. There are a wide range of organisations catering for the young, the old, the charitable, the civic, the social and the religious and these all reflect the strength of community which we would wish the new development to be part of.

Page 42 Social Infrastructure – first paragraph on this page

The words could be changed to “two swimming pools” following the Executive decision of 9th January 2019. The statement would then be true both now and in the future.

Page 45 Figure 21: Views, Topography and Landscape Features.

Something has gone wrong with Figure 21 and the northern part of the site has been lost. In particular item 1, the Crewe Lane Arboretum, does not show.

Page 49 Figure 22: Access and Connectivity

Despite the 20mph speed restriction due to the School, Leyes Lane remains a key connection and we are surprised it is not identified as such in the future.

Page 51 Site Restraints and Opportunities

On the map there are two sites identified as “14”. Presumably one should be “13”?

Page 59 Chapter 7 Development Principles

Throughout this Chapter reference is made to the relevant policies in the Local Plan. Now that the Kenilworth Neighbourhood Plan has been made either reference should be made to the relevant policies or a general statement of relevance should be included in the introductory statement on p60.

Page 60 Delivery of a mix of housing

We welcome the clear statement that any significant change in the number of dwellings proposed must be robustly justified. We are concerned that there is possible confusion in the number proposed should the full educational provision allocation ED2 not be required.

Page 61 Housing mix

We are concerned that there is an implication that the JSHMA is a one-size-all requirement although there is a phrase “Unless further local information is provided”. This cannot be the right solution for this site. We understood that the District Council does indeed have housing mix requirements related to individual towns and we would expect that information to be provided in Table 1 rather than JSHMA, appreciating that the figures might still be liable to revision over time. We note the requirements for “Specialist Housing for Older People”. The specific requirements outlined might also suit people with special needs who are not “Older”. Although not specified here we would welcome the provision (and retention) of some bungalow accommodation in the area.

Page 61 Purpose Built Student Accommodation

This paragraph does not appear to be in accordance with the draft consultation SPD on Purpose Built Student Accommodation (January 2019) which is not referred to. This SPD lays down a strict hierarchy for such accommodation and identifies the whole of Kenilworth outside the town centre as residential area with subsequent restrictions. This paragraph could be interpreted as encouraging if not actually requiring student accommodation. It is unnecessary and should be deleted.

Page 66 Walking and Cycling

We welcome this detailed section which builds on policies in the Kenilworth Neighbourhood Plan but we draw attention to the very detailed response of Mr Ivan Moss to this specific area.

Page 68 Cycling provision on spine roads.

The northern section of Glasshouse Lane is likely to be equivalent to a spine road for through traffic including cyclists from Leamington to Warwick University. It is essential that appropriate design standards and priorities are maintained there, particularly because of the interaction with school traffic.

Page 68 Crossings

The issue of priority for cyclists at side roads is a complicated one for which the County do not appear to have a clear policy. Logically cyclists on a cycleway should have the same priority at a junction as if they were in the roadway, irrespective of traffic flows. We understand that is the system in the Netherlands and support it here. There is confusing repetition between the fourth paragraph of the previous section and this section as both deal with crossings. We suggest that paragraph should be deleted and suitably rewritten within this section or at least rewritten to be less obviously repetitive.

Page 70 On and Off-site Highway Infrastructure

See also the initial Major Issue 3 which relates to this entire section.

As a general comment we are also concerned that the solution on many junctions both old and new is traffic lights. We are well aware of the effects on traffic flow and air quality of the four sets of lights in Warwick Road between Abbey End and St John's. If traffic lights are necessary, rather than simple roundabouts, then it is essential that their control systems are linked to ensure

freer flows. They must also adjust to the varying traffic pressures at different times of day including cycle routes and pedestrian crossings.

Page 73 Figure 25: Employment site preferred access.

One of the existing problems on this junction in busy periods is that traffic from Kenilworth attempting to go left on to the empty slip road to the A46 towards Coventry is held up by traffic backing up from the road to Leamington. We appreciate that in due course signalisation is proposed but we seek reassurance that the proposed junction will free traffic for Coventry.

Page 74 Figure 26: Indicative access arrangement for Thickthorn.

This drawing appears incomplete with the southern side of Leamington Road missing. Our concerns with this junction are that it will be easier to leave Kenilworth by turning left rather than turn right into the town. We wish to encourage links to the town centre and seek priority signals or some other means of encouraging this.

Page 75 Crewe Lane junctions

This is a difficult area and we suspect that even more thought needs to be given to it. We can see no easy solution.

The spine road north encourages people to leave the town although it is a complicated route to reach the A46. Much through traffic is likely therefore to continue on Glasshouse Lane. Restricting Crewe Lane causes complications for the Golf Club which is a busy facility and significant business and for Reservoir House. The junction at Knowle Hill and Glasshouse Lane is a very difficult one as it is on the top of a hill. The junction at Knowle Hill and Dalehouse Lane/Common Lane is both constricted and a steep hill. Locating a large school in the area is another complication, as is possible additional housing and we suspect that as a new route the spine road will attract through traffic from Leamington and Warwick to North Kenilworth and the University,

Page 84 Other Accesses

It is essential that any proposals for additional housing on any surplus ED2 allocation are taken into account when considering traffic issues in that area.

Page 86 St John's Gyrotory

Whilst we appreciate this is not a finalised proposal we are very concerned at the loss of a footway outside the petrol station. This is an unusual site with buildings within the island as well as the petrol station and there should remain a continuous foot way around the centre. The wording should be changed as there are two petrol stations on Warwick Road in Kenilworth and it would therefore be less confusing to simply say "outside the petrol station" as the subject is the gyrotory.

Page 88 Figure 38: Dalehouse Lane/Knowle Hill junction

It is important that the steepness of Knowle Hill at this junction is made clear as it is not apparent from a 2-dimensional plan.

Page 88 Leyes Lane Realignment

Leyes Lane originally took the now proposed straight course and the current deviation was created for good purpose at the time.

Page 90 Public Transport

As the existing X17 service already reaches a corner of the site we are surprised that with relatively minor deviation it could not reach more of the site. The route was extended several years ago when a diversion, necessary to avoid sewer works in Mill End, resulted in a permanent change to the route.

The X18 will require quite a deviation from the A46 and this seems odd for an express service. It does not provide any link to the town centre and we are therefore pleased to see a dedicated shuttle bus suggested though it is not clear how this relates to the current Station bus service around the East of the town.

Page 91 Figure 40: Future Bus Network Proposals Plan

This map would be easier to interpret if the development site were marked on it. We are not clear whether that map is totally up to date with current changes to services, particularly to the X68, though this may not be directly relevant to the Brief.

We would point out that there are existing residential areas in the North of the town which do not currently enjoy good local bus services and we note the aspirational service to that area marked in Figure 17.

Page 94 Table 2 Kenilworth Transport Development Plan Key

We have concerns on the timing of infrastructure delivery. For example according to serial 3 the Thickthorn Development Site Access will be delivered by 2021 but in serial 1 the Thickthorn junction improvements which may interlink will not be delivered until 2023 by when, according to p161 Table 5, 650 dwellings will have been completed, not to mention potential HS2 traffic at that junction. We think that infrastructure delivery needs to be earlier.

Page 97-101 Social and Community Infrastructure

We appreciate the very detailed information included on the proposed Local Centre and Community Centre but there is no real explanation or justification given for the details or for the financial assumptions behind the running costs and support, particularly in the longer term. Careful consideration of the facilities at the proposed Community Centre is vital and flexibility of use essential. For example provision of washing facilities in one of the meeting rooms would enable it to be used for health care. The provision of sporting facilities must complement rather than compete with the proposed public access facilities on the proposed school development. Comparison with Whitnash could mislead as we believe that is also a centre for sports facilities. We wonder what consultation there has been with organisations within Kenilworth. Detailed liaison is essential.

Page 98 Local Centre and Community Facilities

The third paragraph mentions student accommodation. For reasons given in the comments to p61 we question whether this should be specifically mentioned.

The fifth paragraph mentions a gymnasium. We are surprised by this as in the current strategy for the restructuring of such facilities in Kenilworth we are only aware of the expanded facilities proposed at Castle Farm.

Page 99 Community centre configuration

In amplification of the general comments above we are surprised by the inclusion of a sports hall as this would seem to duplicate publicly available facilities we understand will be provided on the new school site. Surely some details of these facilities should be included within this Section of the Brief?

Page 103 Biodiversity, Greenspaces, Play and Recreation Provision.

We note that this section concentrates on human requirements rather than the natural environment. Kenilworth Neighbourhood Plan has several policies including KP4L which are directly relevant. See also p160 comment below.

Page 103 Existing Open Space Provision in Kenilworth

There seems to be confusion here between Open Space and unrestricted (Public?) Open Space. Whilst we appreciate and agree the need for Public Open Space in the new development we feel that the statements on existing space are misleading. The 2008 audit statement regarding Park Hill appears completely out of date. There is a green corridor along Finham Brook which is designated a Local Green Space by Policy KP19 of the Kenilworth Local Plan. This area includes Kenilworth Common and Odibourne Allotments. Parliament Piece and Crackley Woods are also in Park Hill, as is Kenilworth Golf Course which whilst not a public access area provides well-maintained landscaped parkland on the edge of the town.

These paragraphs require significant revision and updating and should be related to the draft consultation SPD on Public Open Space, January 2019.

Page 107 Allotments

Is the reference to the Town Council managing the new allotments meant to refer to the Town Council owning them? Currently the Town Council owns two allotment sites in the town but they are efficiently managed by the tenants' association.

Page 113 Noise

We fully support the requirements for mitigation for the noise from the A46 to be sensitive to the location and to be acceptable within the landscape.

Page 117 Objective 7 – Creating a high quality environment

This is a very important objective and relates to our Major Issue 2 and yet it appears to be in the sub-heading on Health. We suspect that there is a heading, or possibly more text, missing here. If not then we suggest that there needs to be a clear section heading.

Page 132 Car Parking

Kenilworth Neighbourhood Plan has a specific policy KP12 which may strengthen some of these requirements.

Page 134 Incorporating high-quality public art

Could we suggest that artists with local links should be preferred or at least encouraged?

Page 136 Surface water drainage

This is a technical subject but we are surprised at the lack of more specific requirement from the Local Flood Authority and Severn Trent. There are two significant watercourses on the site. Both are illustrated in Figure 13 on p34. The northern one drains directly to the River Avon and is presumably no problem. The southern one, drains through the village of Ashow where there is an existing flood risk. For this reason when Severn Trent, in a major project several years ago, upgraded the surface water drainage system in the southern part of the town they built a large sewer down the Warwick Road to Cattle Brook in Leek Wootton to avoid any effect on Ashow under storm conditions.. We are therefore surprised that the effect of storm conditions on the draining of the site is not specifically mentioned.

Page 145 Figure 57 Street Hierarchy/Connectivity

The map indicates a vehicular access in the southern area of the development off Thickthorn Close, which is currently a quiet residential cul-de-sac off Birches Lane. The access appears to lead only to a short right-angled spur which simply extends the cul-de-sac, with no connection to the rest of the road network. This lack of through connection is essential and should be made very clear.

Page 159 Collaboration and Construction

We suggest that in this section or possibly in some other paragraph, there should be mention of the construction of HS2 during the same time period as the development of this site. There are no proposed HS2 traffic routes directly affecting the development area except at Thickthorn Junction on the A46 but a large compound is planned off the B4115 affecting Crewe Lane to the east of the A46 and the actual trace of the route is just to the north of the area as shown in Figure 2 on p9. In the event of any conflict the Act gives HS2 priority over other local works.

Page 160 Biodiversity, Ecology and Geodiversity Statement

Policy KP4L in the Kenilworth Neighbourhood Plan requires that **an environmental strategy should establish how the development will provide opportunities for net biodiversity gain and manage the sustainable drainage of the land** This should be included in the requirements.

Does the £2m for CIL include or exclude the 25% due to the Kenilworth Town Council? How and where that portion is to be spent has yet to be discussed and decided.