

KENILWORTH NEIGHBOURHOOD PLAN

DRAFT REGULATION 14 REPORT: SEPTEMBER 2017

Purpose

1. The purpose of this report is to summarise part of the outcome of the consultation period on the Pre-Submission Kenilworth Neighbourhood Plan held from May to August 2017. The report reviews the representations made by some of the statutory consultees, including the local planning authority – Warwick District Council (WDC) – and by some developers/landowners with interests in the area. It then makes recommendations for minor modifications to the Plan for its submission.

2. The report will be published by the 'qualifying body', Kenilworth Town Council, and it will be appended to the Consultation Statement that will accompany the submitted Plan in due course, in line with the Neighbourhood Planning (General) Regulations 2012.

Consultation Analysis

3. During the consultation period there were representations made by local people, by other local and interested organisations (notably Kenilworth All Together Greener (KATG), Kenilworth Civic Society (KCS) and the Council for the Protection of Rural England (CPRE)) and by developers (Gleesons and Framptons) and landowners. The WDC and Warwickshire County Council (WCC) officers have made informal comments and responses have been received from the Environment Agency (EA), Natural England (NE) and Historic England (HE). A separate report covers the comments made by local people.

4. The summary analysis of the comments of any substance is provided in respect of each policy below:

KP1 Town Centre

- WDC - reword to break the policy down into discreet parts to aid DM application – agreed
- WDC – decide if to add wording on Abbey End car park route to town centre – KTC to consider
- WDC – reconsider pros and cons of extending the boundary of the primary shopping area – KTC to consider
- WCC – need further details in order to assess the merits - KTC to consider
- KATG – delete reference to new multi-storey car park – KTC to consider
- KCS – add plan showing current town centre uses; add link to KP13 on parking standards (inc. space dimensions); and the policy should require the future development of the Thomas Hearn site to be confined to retail or car parking

KP2 Station Road

- KATG – add requirement for resident only parking to create more space for pedestrians and cyclists - KTC to consider
- KCS – provide for part pedestrianisation – KTC to consider

KP4 Land East of Kenilworth

- WCC – it may not be possible to achieve the highway principles of the policy – noted, though the policy requires attention to be paid to those principles but does not specify detailed solutions
- CPRE – questions the alignment of the link road on the concept plan – the principle has been accepted by the key stakeholders and so should remain, but the details will be agreed at the planning application stage
- Gleasons – supports the majority of the policy but objects to the self-build 5% requirement rather than an overall goal to see self-build as part of the development, based on demand assessed by WDC in future - agreed in principle but need to agree new wording
- Framptons – avoid confusion between Concept Plan and Policies Map and amend policy wording to reflect approved Local Plan text – agreed
- Framptons – amend employment land criterion (d) as suggested – agreed
- Framptons – remove 5% minimum requirement for self-build but continue to provide for some element within the overall housing mix – agreed in principle but need to agree new wording
- Framptons – amend wording of criterion (k) to accurately reflect the NPPF on heritage assets - agreed
- KATG – require roads to be designed to have a 20mph speed limit and include greater priority for pedestrians and cyclists – KTC to consider

KP5 Kenilworth School Sites

- KATG – require roads to be designed to have a 20mph speed limit – KTC to consider

KP6 Land east of Warwick Road

- WDC – remove the requirement linking the housing and sports uses for delivery – agreed
- WCC – it may not be possible to secure separate site access points – this has been satisfactorily resolved with the developer and can be achieved, so no change
- Richborough – not all of the land shown on the Policies Map is in the designated Neighbourhood Area and this should be corrected – agreed
- Richborough – objects as the two elements of the policy cannot be merged as proposed and proposes that the elements be clearly separated in the same policy or sets out as two policies making no delivery inter-dependence – this has been resolved and the elements should be separated in the policy as proposed in the representation

KP7 Abbey Fields

- KCS – consider showing 2014 masterplan in supporting text and encourage its updating – KTC to consider

KP8 Castle Farm

- WDC – note there are implementation challenges and amend the policy to reflect these – KTC to consider
- WCC – need further details in order to assess the merits - KTC to consider
- Jeremy Wright MP – concern with car parking effects of transfer of Wardens' operations - KTC to consider
- KCS – policy should indicate access points and quantity of car parking provisions - KTC to consider

KP9 Traffic

- WCC – concept is supported but it might not be possible to achieve these goals in every proposal – noted
- KATG – delete second part of policy and replace with text to give priority to pedestrians and cyclists, improve safety and assist traffic flow – KTC to consider

KP10 Cycle Routes

- WCC – concept is supported – noted
- KATG – supported but add new text to manage traffic to show cycle lanes

KP11 Connecting the Castle to the Town

- KCS – idea for creating a new pedestrian access - KTC to consider

KP12 Footpaths

- KCS – policy should require minimum pavement and cycle track widths - KTC to consider

KP13 Parking Standards

- WDC – note that WCC is to update the current standards so may not all be in conformity with this and other policies – KTC to discuss with WCC and modify this and other policies as necessary
- KATG – include the requirement for EV rapid charging infrastructure – KTC to discuss with WCC and modify but not sure this is a matter for planning policy
- KCS – space standards should change to accommodate larger vehicles - KTC to discuss with WCC and modify as necessary
- Framptons – the policy is too restrictive and should be amended as suggested - KTC to discuss with WCC and modify as necessary

KP14 General Design Principles

- WDC – the Policies Maps do not accurately show the Conservation Area boundary and should be amended – agreed
- KATG – some minor changes to the text are required plus there are a series of omissions - KTC to consider but not sure this is a matter for planning policy

- KCS – link to Policy KP19 to incorporate requirements for open space - KTC to consider
- Framptons – amend (ix) of the policy to clarify position relating to apartment schemes – agreed
- HE – very supportive but suggest a minor amendment to all the Conservation Area sub-policies as suggested - agreed

KP15 Local Heritage Assets

- WDC – consider identifying the buildings on the Policies Map – suggest the policy refers to an appendix to the Plan, which lists the buildings together with their address (inc postcode)
- Framptons – amend wording to reflect the NPPF on heritage assets as suggested - agreed

KP16 Environmental Standards of New Buildings

- WDC – the Plan can't prioritise the allocation of plots for self-build and this element of the policy should be deleted – KTC should question WDC's views on this and then consider
- Framptons – delete last sentence as it is contrary to the NPPF – KTC should question WDC's views on this and then consider

KP17 Industrial Estates

- WCC – supports goal of securing more car parking for the station if it proves necessary – noted
- KCS – add a map showing the industrial sites – agreed
- KCS – Common Lane estate should be included - KTC to consider

KP19 Green Infrastructure

- WDC – there is a mismatch between the policy and supporting text that needs to be corrected one way or the other – agreed
- NE – support the policy – noted
- KCS – link to Policy KP14 (as above) - KTC to consider

KP20 Local Green Spaces

- WDC – the proposals are not shown on the Policies Maps and this should be corrected - agreed

Other Comments

- WDC - need to update the Policy Context and all references to the Local Plan, given Inspector report approving the new Local Plan for adoption – agreed
- WCC – there is no policy promoting housing for older people or young adults; its evidence indicates the need for an Extra Care Housing scheme in the town, which is unique in the county in having no current accommodation – KTC to consider the option of adding such a requirement or desire to Policy KP4 East of Kenilworth, as there is no current housing policy

- WCC – consider how to strengthen community cohesion through the various social infrastructure-related policies – KTC to consider
- Highways Agency – update text references to HS2 – agreed
- Highways Agency – note the traffic impact of the various Local Plan allocation sites on the A46 will require further assessment in due course – noted
- KATG – air quality is not addressed in the Plan and could be added to Policy KP1 as the town centre has the most significant problems – KTC to consider but to note that initiatives rarely relate directly to the land use planning system
- KCS – the Policies Maps need to be clearer throughout - agreed

Summary

5. In conclusion, it is considered that with a combination of minor modifications to the final submission document, the Plan can quickly proceed to submission, rather than require another pre-submission consultation. Most modifications can be made quickly; a small number of others require some further consideration by the Town Council and other consultees, notably EDC and WCC. Even here, however, those matters ought to be relatively straightforward.

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