

Although the qualifying body will respond to each of the opening enquiries, there are a number of points on which WDC would like to comment, in relation to your opening enquiries.

KP4(e) – Self-build

WDC Self Build Expression of Interest Register

Paragraph 5.23 of the Kenilworth Neighbourhood plan makes reference to figures provided by WDC officers in February 2018 relating to expressions of interest on the self-build register. Those figures were a snapshot in time. They have continued to grow, both in relation to Kenilworth specifically and those looking more generally across the district. As of 30 May 2018, WDC had 34 expressions of interest in self –build in Kenilworth, which equates to approximately 10% of the total entries on the register. Furthermore, 15 on the register are interested more generally across Warwick District (including Kenilworth), and 30 across Warwickshire County.

It is clear that at present, delivery is not keeping pace with interest expressed on the register.

Implications for the KNP

Policy H15 of the adopted local plan specifically encourages neighbourhood plans to identify suitable sites for self/custom build. Taking this, and all of the above into account, WDC is supportive of the approach in the neighbourhood plan to require a proportion of self-build plots within the substantial expansion of Kenilworth to the east. Given the figures from the register outlined above, WDC considers that a 5% self-build/custom build requirement is reasonable, and supported by evidence.

Notwithstanding the above, officers are of the view that it could be acceptable to amend the wording of KP4(e) so that it refers to the evidence base at the time the sites come forward, accepting that the self-build register of interest is considered on a three year rolling basis. Officers are not however satisfied that the suggested wording in the representation made by Savills would be satisfactory, as it implies a 5% delivery only if there is demonstrable demand for 5% on the register. This may be interpreted that should there not be demand for 5%, then no self-build plots at all might be required, even though some demand would almost certainly be evident. We therefore suggest that if the wording be amended, it should be amended along the following lines:

“the provision of a proportion of the open market homes as serviced plots for self-build and custom build, commensurate with demand evidenced on the self-build register of interest, not exceeding 5% of the total number of dwellings.”

KP6 – Land East of Warwick Road

The outline application was granted as per the committee report in April 2018 (subject to S106). The qualifying body is keen for the policy to influence the detailed layout of the development through a reserved matters submission.

KP13 – Parking

This policy was largely drafted prior to WDC publishing a consultation draft of revised parking standards for the district, although the qualifying body were aware they were under preparation. This made it challenging for KTC, which was keen to include a policy on car parking in light of

relatively high levels of car ownership in Kenilworth. It has been the understanding of officers that it was intended that the neighbourhood plan would seek to reference the district's new standards. This was on the basis that they would allow for greater provision than the previous document which had restrictive maximum standards.

The new WDC Parking Standards SPD was adopted by Executive on 27 June 2018. These vehicle parking standards are intended to be flexible. They do not contain "minimum" standards, but rather "expected" standards. Variation up or down from these 'expected' standards would need to be justified on a case by case basis. For major developments, the SPD also includes a requirement for unallocated parking provision, primarily to accommodate visitor parking. It is envisaged that such unallocated provision could be accommodated within the street, and therefore the street design would need to reflect this as appropriate.

In light of the above, and subject to the views of the qualifying body, it may be beneficial to review the some of the wording in this policy for clarification and precision.

KP14 – General design principles

Policies HE1 to HE4 of the local plan (there are no policies HE5 or HE6) are not strategic policies in the local plan, and officers are not of the view that the neighbourhood plan is seeking to achieve objectives which are incompatible with either policy HE1 or HE2. We do not see any relationship between policy KP14 and local plan policies HE3 or HE4 (locally listed historic assets and archaeology respectively).

Local plan policy HE1 is concerned with avoiding substantial loss or harm to a designated heritage asset and its significance, and the circumstances in which such loss or harm might be considered acceptable. Policy KP14 of the neighbourhood plan by contrast seeks for new development proposals to consider heritage assets within the locality of the site (rather than being the subject of development themselves). The use of the words "sustain" and "enhance" in respect of any heritage asset in policy KP14 might arguably be better clarified in respect of the policy relationship with policy HE1, subject to the views of the qualifying body.

Local plan policy HE2 refers to retaining buildings which make a positive contribution to conservation areas and restoration of such buildings also. Policy KP14 of the neighbourhood plan refers to new development in the conservation area. The two are not considered incompatible, though the different roles of these policies could be explained in the supporting text, subject to the views of the qualifying body.