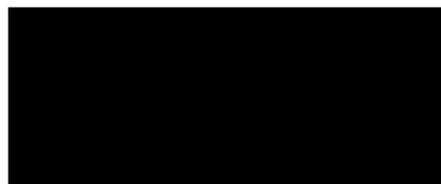


**Local Plan Publication Draft
Consultation (May 2014)**
Representations on behalf of Lands
Improvement Holdings and Kenilworth
Golf Club

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June 2014

indigo



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1. Introduction

- 1.1. These representations have been prepared by Indigo Planning on behalf of Lands Improvement Holdings (LIH) and Kenilworth Golf Club (KGC) in respect of Warwick District Council's (WDC) Local Plan Publication Draft (May 2014) consultation.
- 1.2. Both parties welcome the opportunity to comment upon the policies and allocations set out in the Local Plan Publication Draft. In particular, LIH and KGC are keen to ensure that the policies and allocations contained in the Local Plan are flexible and realistic to assist in meeting the needs of Kenilworth and the wider district.
- 1.3. The Local Plan Publication Draft sets out WDC's proposed development strategy and site allocations. It sets out WDC's housing requirements for the District and identifies the sites that it proposes to allocate to meet the identified housing targets. This includes the release of selected sites from the Green Belt to bring forward for development.

Policy Context

- 1.4. The National Planning Policy Framework (NPPF) sets out clear advice on how Local Plans should be prepared. The following key statements from the NPPF provide the framework for how Councils should approach the preparation of Local Plans, particularly with reference to housing targets:
- Paragraph 47 confirms the need for local planning authorities to boost significantly the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
 - Paragraph 151 states that Local Plans: "*must be prepared with the objective of contributing to the achievement of sustainable development*". This includes ensuring that the Local Plan has a presumption in favour of sustainable development.
 - Paragraph 154 identifies that Local Plans should be "*aspirational*", but "*realistic*", and should set out opportunities for development.
 - Paragraph 156 states that strategic priorities and policies within Local Plans should deliver the homes and jobs needed in an area.
 - Paragraph 157 states that Local Plans should plan positively for the development and infrastructure required in an area.
 - Paragraph 159 states that LPAs should '*prepare a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) to identify and meet the housing need over the plan period*'.
- 1.5. It is clear that the NPPF promotes the preparation of flexible and positive Local Plans, which respond to the needs of the particular area and which are based on a robust evidence base.
- 1.6. In this regard, we have a number of concerns with the policies included in the Local Plan Publication Draft:
- the key issue relates to the ability of the Local Plan to meet the full, objectively assessed needs for market and affordable housing within Kenilworth and the wider district;

- the allocation of the sites identified in Kenilworth is insufficient to provide the flexibility required in the Local Plan to adapt to rapid change throughout its lifetime; and
- the suitability of Kenilworth Golf Club to be developed for housing to meet the identified need.

Kenilworth Golf Club

- 1.7. These representations identify the housing need in both the District as a whole and locally in Kenilworth and demonstrate the opportunity provided by KGC to meet this need. The impact of HS2 on the course and the resultant implications on the viability of KGC means that KGC must consider if its current location is the best location to secure its long term future. Linked to this, the Club is currently exploring alternative locations.
- 1.8. LIH are working with KGC to facilitate a re-location of the Club, if this is deemed to be the best option. A number of alternative locations have been considered. KGC has chosen a preferred site in the Kenilworth area and is in direct negotiations with the landowner. Details of the alternative site are currently confidential and commercially sensitive. The new site has the ability to provide facilities that, as a minimum, equal those provided at the current location.
- 1.9. The existing KGC site offers a suitable location to meet the housing growth needs of Kenilworth. To support this view, the following additional documents have been prepared:
- a masterplanning document, prepared by EPR Architects; and
 - a Highways and Transport Technical Note, prepared by Vectos.
- 1.10. These documents are submitted in support of these representations and should be read alongside this statement.
- 1.11. The supporting documents demonstrate that the KGC site is suitable for residential-led development and offers the opportunity to provide in the region of 700 – 1,000 new homes, along with supporting community facilities and high quality formal and informal open space.. The site could provide a new sustainable community that naturally extends the existing residential areas to form a new edge to the east of Kenilworth.

Report Structure

- 1.12. The structure of these representations is as follows:
- Section 3 outlines our views on housing need in the District;
 - Section 4 assesses the ability of the proposed allocations to meet housing need;
 - Section 5 considers the availability and suitability of Kenilworth Golf Club to meet housing need in the District;
 - Section 6 outlines the likely impacts of the HS2 railway line on the existing course and the implications of this for the Kenilworth Golf Club; and
 - Section 7 sets out our conclusions.

2. Housing Need in Warwick District

Introduction

- 2.1. Paragraph 47 of the NPPF confirms that LPAs must base their Local Plan requirements on their evidence base. WDC's evidence base, in respect of housing requirements, is set out in the Strategic Housing Market Assessment (SHMA) (March 2012) and the Coventry and Warwickshire Joint Strategic Housing Market Assessment (JSHMA) (November 2013).
- 2.2. Policy DS6 of the Local Plan Publication Draft states that WDC will provide for 12,860 new homes between 2011 and 2029. Paragraph 2.20 states that the housing requirement aims to meet its objectively assessed need for housing as set out in the JSHMA.
- 2.3. We have a number of concerns about the approach taken in the JSHMA in that it fails to assess the localised housing need of individual settlements within the District.
- 2.4. We address the overall need in the district and its localised need in Kenilworth in the context of the SHMA (March 2012) and the JSHMA (November 2013) below.

The SHMA (March 2012)

- 2.5. The SHMA (March 2012) identified that 12,564 new homes will be required between 2011 and 2029. This equates to 698 dwellings per annum.
- 2.6. Table 7.17 of the SHMA (March 2012) sets out a summary of the housing needs situation in Warwick District as a whole, and provides a breakdown of the need for the individual towns such as Kenilworth. Our summary of Table 7.17 is provided below.

Table 1: Indigo Summary of SHMA Housing Need

Location	2011 - 2029		
	Annual	Total	% of Total
Kenilworth	115	2,070	16.5
Leamington / Warwick / Whitnash	528	9,504	75.6
Rural	55	990	7.9
Warwick District	698	12,564	100

Source: Table 7.17 of WDC's SHMA (March 2012)

- 2.7. Based on housing need alone, the SHMA identifies that a base total of 12,564 dwellings (698 dwellings per annum) will be required in the District during the plan period 2011 to 2029. This includes 2,070 dwellings in Kenilworth equating to 16.5% of the District-wide requirement
- 2.8. However, paragraph 2.56 (and elsewhere) of the SHMA states that forecast employment growth in the District is for 11,860 jobs over the plan period to 2029. Paragraph 2.57 states that if an adequate number of new homes are to be provided to accommodate the additional employees within the District, then 12,870 new homes would be required to 2029, taking account of changes in the age structure of the population.
- 2.9. WDC acknowledge the District currently has a high level of out-commuting and that its residents travel elsewhere for work. Planning for a higher number of jobs / employment opportunities in the District, coupled with a higher level of housing growth, would go some way in reducing the level of out-commuting, which will have obvious sustainability benefits.

- 2.10. In respect of Kenilworth, the SHMA goes on to conclude that, based on current needs, future population trends and taking into account employment growth, 19% of the new housing within the District should be directed to Kenilworth. This is an increase from 16.5% identified in Table 7.17 of the SHMA (see our summary in Table 1).
- 2.11. Table 2 below clarifies the need identified in the SHMA under the two scenarios (16.5% and 19%) in the 18 year period to 2029.

Table 2: Assessment of Housing Need to 2029

Source	District Housing Need Figure	Kenilworth Need @ 16.5% ¹ of Total	Kenilworth Need @ 19% ² of Total
SHMA Base Figure (housing need only)	12,564	2,070	2,387
SHMA Figure, including employment provision	12,870	2,124	2,445

¹ Existing need as established in Table 7.17 of the SHMA and Table 1 of Indigo representations

² Projected housing need as identified in SHMA (2012)

- 2.12. In summary, to meet the need identified in the SMHA, between 2,070 and 2,445 new homes should be provided in Kenilworth. This is based on Kenilworth accommodating between 16.5% and 19% of the District's housing need.

JSHMA (November 2013)

- 2.13. The Housing Requirement of 12,860 new homes between 2011 and 2029 (as set out in in Policy DS2 of the Local Plan Publication Draft), has been primarily derived from the JSHMA (November 2013).
- 2.14. This is based on the mid-point (715) of a requirement of between 659 and 772 dwellings per annum derived from using the 2008 and 2011 population projections.
- 2.15. However, in order to rectify the past suppression of household formation in the District, we consider that the higher end figure of 772 dwellings per annum would be a more appropriate and positive target to aim for, which would have the most beneficial impact on addressing housing need in the District and combatting the issue of affordability.
- 2.16. Based on the above, we consider that to provide a robust housing target, the Local Plan should adopt the higher housing requirement of 772 dwellings per annum in order to meet the objectively assessed need in the District. For the plan period 2011 – 2029 this equates to a housing requirement of 13,896 dwellings.

Housing Need in Kenilworth

- 2.17. Kenilworth is an historic town with a population of approximately 22,413 at the 20011 Census. Its history is centred on Kenilworth Castle and the Abbey which have their origins in the 12th century. Kenilworth grew rapidly after the Second World War and today has a strong residential character due to its proximity to Coventry and the nearby Warwick University.
- 2.18. The town is the third largest in the District, behind Leamington and Warwick. Analysis of housing needs undertaken by WDC in the SHMA (March 2012) demonstrates that the need is highest in Leamington and Warwick with approximately two thirds of housing need in the district. However, the need in Kenilworth equates to nearly a fifth of all housing need in the district. It is important that this need is met and the growth of Kenilworth is supported to ensure that the working age population is retained by providing sufficient housing to meet

local needs.

- 2.19. The town has good transport links - Birmingham International Airport, the M6, M42 and M40 are within 10 miles. Although the town's railway station was closed in the 1960s the town has received funding from the Government to reopen the station. There is a regular bus service to Coventry and Leamington railway stations, and Warwick Parkway railway station is less than 10 minutes' drive away on the A46 bypass.
- 2.20. The town is well served by retail provision which was boosted by the opening of a Waitrose store in 2009.
- 2.21. Due to the housing pressures in the district, and the additional pressures of housing growth in the wider area, particularly Coventry to the north, Kenilworth is a highly suitable location for additional housing growth.
- 2.22. The SHMA (March 2012) stated that based on current needs and future population trends, between 16.5% and 19% of the new housing within the District should be directed towards Kenilworth. The JSHMA (November 2013) does not address the issue of housing distribution across the District. Instead, it focuses on housing need in the District as a whole, along with housing need in neighbouring authorities. The level of need identified in Kenilworth was based upon the fine grained analysis in the SHMA (March 2012). It is wrong to ignore this locational analysis in the JSHMA (November 2013) and in the policies included in the Local Plan.
- 2.23. There is an identified need for significant additional housing in Kenilworth (the third largest settlement in WDC) which will not disappear. The localised need will only be exacerbated if it is not addressed in the Local Plan.
- 2.24. The Local Plan should, therefore, seek to address localised housing need in Kenilworth by focusing a proportion of its housing target to the town.
- 2.25. Table 3 below sets out below our analysis of the JSHMA (November 2013) housing requirement that should be directed to Kenilworth based on the SHMA (March 2012) target of between 16.5% and 19% of the overall housing requirement. We have applied this to the mid-point target used in the Local Plan Publication Draft (12,860) and the more appropriate and robust target (13,896) calculated in paragraph 2.16 above.

Table 3: Assessment of housing need in Kenilworth

Source	District Housing Need Figure	Kenilworth Need @ 16.5% of Total	Kenilworth Need @ 19% of Total
JSHMA (2013) mid-point target	12,860	2,122	2,443
JSHMA (2013) – robust target	13,896	2,293	2,640

- 2.26. Based on the proportion of housing considered necessary to meet housing needs in Kenilworth, as set out in the SHMA (2012), at least 2,122 dwellings will need to be provided in Kenilworth based on the JSHMA mid-point target of 12,860 dwellings for the District. This increases to at least 2,293 if the JSHMA robust target of 13,896 dwellings is adopted.

Conclusion

- 2.27. The housing requirement identified in the Local Plan Publication Draft has not been set to meet the District's objectively assessed need and demand, taking into account the localised need in the District's settlements. The Local Plan cannot be considered sound on this basis. In this respect, the housing requirement for the District should be increased.

2.28. In light of the above, we consider that Policy DS6 should be amended as follows:

“The Council will provide for ~~at least 12,860~~ 13,896 new homes between 2011 and 2029”

2.29. Furthermore, the proportion of housing directed towards Kenilworth should also be increased to meet the town’s objectively assessed need. The Local Plan should include a new policy that sets a minimum housing requirement for each main settlement within the District to ensure that housing is distributed in a sustainable manner and is provided where it is most needed to meet the population’s requirements. On this basis, we consider that a new policy comprising the following should be incorporated into the Local Plan:

“The housing requirement will be focused on the District’s main settlements, although an allowance is made for the rural parts of the District. The housing requirement of 13,896 dwellings will be distributed as follows:

- *Kenilworth: at least 16.5% / 2,293 new homes.*
- *Leamington / Warwick / Whitnash: at least 75.6% / 10,053 new homes.*
- *Rural: at least 7.9% / 1,098 new homes.*

2.30. We have used the 16.5% proportion of housing for Kenilworth from Table 7.17 of the SHMA (March 2012). However, for the reasons set out in paragraphs 2.9 and 2.10 above, it would be more sustainable to use 19% as the proportion of housing to be provided in Kenilworth.

3. Proposed Housing Allocations

Introduction

3.1. Based on our assessment in Section 2, we consider that a proportion of the District wide housing requirement should be directed to Kenilworth. Based on the SHMA (2012), we consider that at least 16.5% of the total requirement should be provided in Kenilworth:

- Against the Local Plan Publication Draft target of 12,860 dwellings, this equates to 2,122 dwellings in Kenilworth; and
- Against the JSHMA (2013) robust target of 13,896 dwellings, this equates to 2,293 dwellings in Kenilworth.

3.2. Therefore, as a minimum, the Local Plan should direct 2,122 new dwellings to Kenilworth.

Proposed Housing Allocations in Kenilworth

3.3. Policy DS11 of the Local Plan Publication Draft identifies the proposed housing allocations in the District. This includes 1,230 dwellings on proposed allocations in Kenilworth, comprising:

- 760 dwellings on land east of Kenilworth (Thickthorn);
- 250 dwellings on the Kenilworth School Site;
- 130 dwellings on the Kenilworth VI Form College; and
- 90 dwellings at the Crackley Triangle.

3.4. This level of housing growth for Kenilworth falls significantly short of the minimum 2,122 dwellings that we consider to be required to meet local housing need in the town. This is a shortfall of 892 dwellings. However, applying a more robust District-wide total (13,896) the shortfall will be 1,063 dwellings.

3.5. This creates a clear requirement to identify additional suitable locations for housing development in Kenilworth. The current focus of new housing allocations at land south of Warwick and south of Leamington Spa to meet the District's housing need will not adequately meet the identified need for future housing growth in Kenilworth and is not a sustainable distribution of development.

3.6. In accordance with the NPPF requirement to plan positively and to meet for the needs of the area, WDC should aim to accommodate higher levels of housing growth in Kenilworth. Failure to address housing need in Kenilworth and effectively ignoring the evidence base, fundamentally undermines the plan process and will lead to unsound plan-making.

3.7. Based on the evidence, it is clear that Kenilworth should be accommodating a much higher proportion of housing. Instead of the current figure of 1,230, the town should be accommodating at least 2,122 dwellings, and probably 2,293 dwellings.

3.8. There are limited housing sites within the built up area of Kenilworth. Given the shortfall in housing, other suitable sites need to be considered and which are not necessarily located within the built-up area. On the basis that the town should, and needs to, accommodate at least 892 additional new homes (over and above the 1,230 already allocated); other suitable sites need to be allocated in or around the town.

- 3.9. In this respect, Kenilworth Golf Club (KGC) has already been identified by WDC as a potentially suitable site to accommodate housing growth in the town. The SHLAA (March 2012) identified that the site is potentially suitable for housing growth. It categorised KGC as being as suitable as the currently proposed allocation at Thickthorn. This assessment was carried forward into WDC's draft Development Strategy (July 2012), identifying the land to the east of the town including land at Thickthorn and KGC as the only potentially suitable locations for new growth in Kenilworth.
- 3.10. This position was replicated in WDC's SHLAA (2014) which considered that KGC is:
- “Potentially suitable subject to Green Belt amendment; satisfactory diversion of National Trail; satisfactory relocation of golf club; mitigation of impact on groundwater and area of high landscape value.”*
- 3.11. The SHLAA (2014) proforma identifies that between 750 and 1,250 dwellings could be provided on the site in the latter part of the Local Plan period (2019 onwards).
- 3.12. In short, WDC has already accepted that KGC is, in principle, a suitable location for new housing development, and has previously identified it as having potential to meet Kenilworth's housing needs.
- 3.13. This is relevant because the eastern fringe of Kenilworth has been identified as the most appropriate direction for housing development. Further, the development of HS2 will change the north eastern part of Kenilworth to such a degree that the character of the natural and physical environment will be fundamentally altered.

4. Kenilworth Golf Club (KGC)

- 4.1. In order to address the shortfall in housing provision in Kenilworth, KGC should be allocated for housing. The site can accommodate 700 – 1,000 new dwellings, together with a mix of supporting community uses and high-quality formal and informal open space. Given the location, topography, and shape of the course, and its single ownership, it affords the opportunity to provide a well-planned, attractive and sustainable extension to Kenilworth. It can be comprehensively planned and managed such that it will integrate into the existing town and also provide new services and facilities to ensure the long-term sustainability of the new community.
- 4.2. Given the housing need in Kenilworth, KGC should come forward alongside the Thickthorn site. Both sites are rated similarly in the SHLAA. Both sites are easily accessible to the strategic transport network and both sites have, or will have, easily defensible barriers to prevent further encroachment into the Green Belt. HS2 will provide a defensible boundary for KGC. We consider the impact of HS2 on KGC in the next section.
- 4.3. As such, both sites can come forward as part of a cohesive and planned strategy for the town which will adequately meet housing demand. This solution would address any concerns regarding deliverability and more appropriately address the objectively assessed need for housing in Kenilworth. Both sites should be allocated in the Local Plan.
- 4.4. The Green Belt function of the site will be eroded by the route of HS2 as it will no longer form a cohesive part of the wider Green Belt or the countryside area (see Section 5).
- 4.5. KGC offers a sensible and defensible location to meet the housing growth needs of the town. To support this view, these representations include a masterplanning document, prepared by EPR Architects, and a Highways and Transport Technical Note prepared by Vectos.
- 4.6. These supporting documents demonstrate that:
- The KGC site is suitable for residential-led development and offers the opportunity to provide in the region of 700 -1,000 new homes (assuming density of approx. 30 - 40 dwellings per hectare);
 - The site can provide a new a sustainable community, that naturally extends the existing residential areas to form a new edge to the east of Kenilworth;
 - The site is accessible to existing facilities and there is an opportunity to provide further community facilities on-site;
 - The submitted initial masterplan layout is designed to maximise connections between Kenilworth and the surrounding landscape to ensure both visual and physical integration; and
 - Based on the proposed allocations in the Local Plan, WDC is seeking to provide a new secondary, sixth form school and primary school on the land immediately south of Crewe Lane. This would further increase the accessibility, connectivity and sustainability of the KGC site.
- 4.7. On this basis we consider the KGC site be a suitable and logical extension to Kenilworth that will meet local housing needs.

5. The Impact of HS2 on KGC

- 5.1. Kenilworth Golf Club Limited owns and operates KGC. KGC currently provides high quality golf facilities for the population of Kenilworth and its surrounds.
- 5.2. KGC has an annual turnover of circa £1.0 million and reinvests its profits to improve its facilities for its existing, and to attract new members. In a highly competitive market, KGC competes directly with eight other golf courses within 10 miles. KGC employs 16 full time staff and up to a further 10 casual / part-time staff. In addition, the club retains a golf professional, whose tuition and retail business, which is located on the site, generates annual revenue of circa £200,000 and employs three permanent members of staff. The on-site facilities include a bar and restaurant area. KGC also occasionally hold events at the Club, which take place in a marquee on the grounds.
- 5.3. KGC has over 950 members, including 630 adult golf members, 78 junior members and other social members. In addition, approximately 3,000 rounds of golf a year are played on the course by visitors.
- 5.4. The KGC course is a popular course in a parkland setting. The course is of a high specification and includes extensive irrigation and drainage systems. KGC estimates that to build a comparable course would cost in the region of £7.0m.
- 5.5. In order to safeguard the route of HS2, parts of the course are to be compulsory purchased. This is illustrated on the opportunities and constraints plan included in the accompanying EPR masterplan document. This will have significant implications for the operational requirements of KGC, and its general attractiveness and character. The HS2 proposals include the compulsory purchase of land along the 16th hole (adjoining Dalehouse Lane), land adjoining the 2nd hole and 3rd hole and land adjacent to the practice area. At a minimum, these impacts will require a substantial re-organisation of the whole course to the detriment of at least four holes and, therefore, to the business as a whole.
- 5.6. The noise and disruption caused by the construction and operation of HS2 further threatens the viability of the business.

Impact on 16th hole

- 5.7. The HS2 proposals include the compulsory purchase of land on the northern boundary of the golf course, adjoining Dalehouse Lane. This includes a strip of land approximately 15m wide and 200m long along the length of the 16th hole. The land is being acquired to provide an access route for traffic involved in the construction of the new route of Dalehouse Lane.
- 5.8. KGC and England Golf, golf's governing body within England, have confirmed that the acquisition of this land will render the 16th hole unplayable. The loss of the 16th hole will threaten the viability of KGC's business as a whole. The loss of one hole on an 18 hole golf course will make the operation of the course unsustainable. Golf is a game played over 18 holes, upon which all handicapping systems and competitions are based.
- 5.9. KGC will be left with no choice but to redesign its current course to make up for the loss of the 16th hole. KGC has no opportunity to acquire land outside of its borders to replace the hole lost, and so any replacement will have to come from within its existing land ownership. Any internal re-organisation will be further constrained by the need to ensure that the flow of play follows naturally from the end of one hole (the green) to the start of the next (the tee). KGC have considered the alternatives and have concluded that the redesign of the course will require alterations to four holes. Golf course designers have advised KGC that this course

redesign would cost in the region of £620,000.

- 5.10. Even the temporary possession of land will make the 16th hole unplayable for a period of time, and therefore the course as a whole less attractive to members and visitors. If the course becomes unattractive, members may leave, and, as referred to below, even a small loss of members may lead to a spiral of decline that cannot be reversed.

Impact on 2nd and 3rd holes

- 5.11. The HS2 proposals include the compulsory purchase a strip of land measuring approximately 160m long and 20m wide where the course borders the A46 to the southeast to accommodate a layby on the A46. This will remove parts of the 2nd and 3rd holes, and the practice area. The compulsory purchase of this land will have the following effects:

- the loss of 40 metres to the length of the 3rd hole which, without a redesign of the course, will result in the downgrading of a critical course measure (standard scratch score) and therefore also diminish the attraction of the course to members;
- the loss of approximately 5 metres of land abutting the 2nd green which, without a redesign of the course, will render the 2nd hole unplayable; and
- the closure of the practice area for safety reasons due to the removal of the land and substantial tree screen between it and the A46 road.

- 5.12. The additional cost of redesigning the course to address impacts that the loss of this land will have is estimated to be at least £490,000.

- 5.13. In addition to the loss of land, the introduction of the layby on the A46 will result in the loss of the mature tree line, which currently borders the golf course along the boundary with the A46. The tree line currently acts as both a visual screen and natural buffer that reduces traffic noise from the A46. With this removed, the A46 will be fully exposed on the golf course leading to significant visual and noise impact on the course and its members. This will significantly reduce the attractiveness of the course.

Noise Concerns

- 5.14. KGC will be bordered by HS2 for approximately 800 metres on its north eastern boundary. The substantial increase in noise levels identified in the Environmental Statement (ES) which supports HS2 will adversely affect one third of the holes and significantly adversely affect at least 4 holes.

- 5.15. The proposed elevation of Dalehouse Lane, on the north west of its border, by at least 10 metres above its current height to cross the HS2 rail line, and the removal of the mature tree screen between the course and the A46 to extend the A46 embankment, will also increase noise levels.

- 5.16. No provision for sound insulation has been made for KGC as the Government has determined that a golf course be categorised with all other outdoor leisure facilities as transitory in their use. In reality, golf courses are distinct from other outdoor leisure facilities in that:

- a golf requires a quiet and tranquil setting, or at least a constant low level of background noise;
- a golf course is in near constant daily use, (KGC is typically in play for around 70 hours per week); and
- the natural environment is used to add difficulty and character to the sport through individual course layout and landscaping.

- 5.17. The intrusion of intermittent, sudden, loud noise as regularly as every two minutes from HS2 trains on a predominantly tranquil environment will seriously impair the concentration of golfers. The lack of recognition of KGC's unique requirements means that no allowance has been made for the very serious commercial implications that the disruption of the tranquil environment by HS2 will have on KGC's business.
- 5.18. Unlike housing development which can factor in mitigation measures at design stage, including appropriate location/design of buildings, acoustic bunds / fencing, buffering open space areas and landscaping, KGC cannot accommodate mitigation measures without further encroachment into the golf course.
- 5.19. The effect that the change to the local environment caused by HS2, both during construction and operation, will have on KGC will be significantly adverse. With the increase in noise levels, the ability of KGC to attract players to the course will be dramatically impaired. The construction and operation of HS2 will mean that the course can no longer provide an acceptable environment for playing golf. Golfers are mobile and golf club joining fees in the area are broadly similar. Therefore, members can, and do, go elsewhere if they are not happy with the facilities. The fact that there are other clubs nearby that will not be disrupted by HS2 means it is highly likely KGC members will go elsewhere.
- 5.20. KGC know that members do move to avoid poor playing conditions. In 2001, poor drainage at KGC over one winter led to a loss of 100 members. However, this issue was resolved in a matter of months unlike HS2 which will be permanent. With a decline in membership and visitor numbers, bar and catering revenue is lost, total revenue would decline, with only a very minimal reduction in costs. For these reasons, KGC considers HS2 a threat to the long term viability of the business.
- 5.21. Given the substantial construction disruption and enduring noise impact HS2 will have on KGC when the railway is operational, and due to the lack of opportunities to acquire additional land to augment the course, KGC must consider if its current location is the best place to secure its long term future. Linked to this, KGC is exploring alternative locations in the Kenilworth area. A number of alternative locations have been considered to date. The club has now chosen a preferred site and is in direct negotiations with the landowner at present. Details of the alternative site are currently confidential and commercially sensitive.
- 5.22. The purchase of an alternative site and construction of a new golf course and clubhouse would be a significant outlay for KGC. This process can only be funded by the sale and subsequent redevelopment of the existing KGC site. LIH are working with KGC to facilitate this process.

6. Conclusion

- 6.1. As set out in this representation, we have a number of concerns with the policies included within the Local Plan Publication Draft. The fundamental issue relates to the ability of the Local Plan, to meet the full, objectively assessed needs for market and affordable housing within Kenilworth and the wider district. Furthermore, the allocation of the sites identified in Kenilworth is insufficient to meet localised need in the town and provide the flexibility required in the Local Plan to adapt to rapid change throughout its lifetime.
- 6.2. Based on WDC's own evidence, and in order to rectify the past suppression of household formation in the district, we consider that a housing requirement of at least 772 per annum is the most robust target to aim for, which would have the most beneficial impact on addressing housing need in the district and combatting the issue of affordability. For the plan period 2011 – 2029 this would see an increase from 12,860 to at least 13,896 dwellings.
- 6.3. The SHMA (2013) lacks any assessment of need for the individual settlements in the district unlike the SHMA (2012) which set out the extent of housing need in Kenilworth. The SHMA (2012) identified that between 16.5% and 19% of the total housing requirement in the district should be directed towards Kenilworth. This need has not been addressed in either the SHMA (2013) or the Local Plan policies as currently drafted.
- 6.4. This localised need still remains and the Local Plan should be amended to address this need. On this basis, we consider that Kenilworth should accommodate a much higher proportion of housing. Instead of the current figure of 1,230 dwellings allocated for the town, Kenilworth should be accommodating at least 2,122 dwellings which equates to 16.5% of the proposed housing requirement of 12,860 dwellings. Against the more robust target of 13,896 dwellings District-wide, the Kenilworth target should be at least 2,293 dwellings.
- 6.5. KGC has previously been considered by WDC for redevelopment for housing in the SHLAA 2012 and the updated SHLAA 2014. The site was considered to be suitable for redevelopment, subject to the release of the site from the Green Belt and design considerations to mitigate against any adverse impacts.
- 6.6. The Green Belt function of the site will be eroded by the route of HS2 as it will no longer form a cohesive part of the wider Green Belt or the countryside area. The site, therefore, offers an opportunity to accommodate significant housing growth in addition to the sites already identified to meet the housing needs of Kenilworth.
- 6.7. The future of KGC is uncertain due to the proposed HS2 route, which will have significant adverse impacts on the operational requirements and viability of the Club. Due to the anticipated impacts of HS2, KGC is exploring options to relocate the Club in order to secure its long term future.
- 6.8. The redevelopment of the current KGC site for housing will provide the financial stability and funding to secure the relocation of the Club, whilst providing the opportunity to meet the housing needs of Kenilworth.
- 6.9. On this basis, the KGC site should be released from the Green Belt and allocated for housing.

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