



Representations to the
Kenilworth Neighbourhood Plan
May 2018

On Behalf of Catesby Estates Plc

A104168

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S Butterfield	K Fenwick	K Fenwick



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Appendix 3 – Indicative Plan for Glasshouse Lane



1.0 Introduction

1.1 Overview and Background

- 1.1.1 WYG act on behalf of Catesby Estates Plc in respect of their land interests at Crewe Lane and Woodside Training Centre, which fall within the Kenilworth Neighbourhood Plan Area and within the administrative boundary of Warwick District Council. The land interests are identified on the Plan at **Appendix 1**.
- 1.1.2 These representations are submitted to the Kenilworth Neighbourhood Submission Version, which is being consulted on in accordance with the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42.
- 1.1.3 Representations were also made to the Pre-Submission version of the emerging Neighbourhood Plan in June 2017. They are repeated here where they remain relevant (i.e. where the draft Neighbourhood Plan should be amended) and are also included at **Appendix 2** for completeness.
- 1.1.4 The Neighbourhood Plan is being promoted against the backdrop of the Warwick Local Plan, which was adopted in September 2017. It is therefore appropriate that the Neighbourhood Plan is developed on this basis as it will be in general conformity with Local Plan strategic policies, as required by NPPF para 184.
- 1.1.5 Catesby Estates Plc's land interests fall within Warwick Local Plan H40 allocation for residential development, to which draft Policy KP4 – Land East of Kenilworth in the Neighbourhood Plan refers.
- 1.1.6 The identification of land at Policy KP4 (land east of Kenilworth) in the Neighbourhood Plan is supported in principle. It accords with the Warwick Local Plan Site Allocations H06 and H40 which identify land east of Kenilworth, including Catesby Estates Plc's land interests, for residential development of 1,400 dwellings plus employment and education development.
- 1.1.7 These detailed representations made to the Kenilworth Neighbourhood Plan Submission Version are therefore concerned with matters of detail rather than principle. The representations comprise comments on the following policies:
- Policy KP4
 - Policy KP14
 - Policy KP15
- 1.1.8 In accordance with paragraph 8(2)(a) of Schedule 4B of the Town and Country Planning Act 1990 (As amended) the representations to the draft Neighbourhood Plan have been made with



reference to the Basic Conditions within which the Neighbourhood Plan must comply, namely:

"(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,

(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,

(d) the making of the order contributes to the achievement of sustainable development,

(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

(f) the making of the order does not breach, and is otherwise compatible with, EU obligations and

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."

1.1.9 It is noted that the Neighbourhood Plan Submission Version is now accompanied by a Basic Conditions Statement in accordance with PPG070. In accordance with the representations set out in this document, specific amendments to some draft Neighbourhood Plan policies will necessitate updates to the Basic Conditions Statement in due course.

1.1.10 Catesby Estates Plc look forward to continued working with the Town Council in respect of the production of the Kenilworth Neighbourhood Plan and the finalisation of the proposals for the land east of Kenilworth and would be pleased to discuss any matters raised in these representations further as necessary.

2.0 Planning Policies of the Kenilworth Neighbourhood Plan

2.1 Policy KP4 – Land East of Kenilworth

- 2.1.1 These representations provide in principle support for the Town Council's acknowledgement of and support for the Warwick Local Plan allocations H06 and H40 within draft Policy KP4 – Land East of Kenilworth.
- 2.1.2 There are, however, some specific parts of the Policy to which concern is currently raised, on the basis that, as drafted, it does not fully reflect the adopted Local Plan policy and therefore does not comply with the Basic Conditions.
- 2.1.3 Local Plan Policy DS15 states that proposals for allocated sites *"will be approved where they represent a comprehensive development scheme for the whole site. There will be a requirement to demonstrate this by the submission of either a Development Brief or a Layout and Design Statement..."* (my emphasis). In addition, Local Plan Policy BE2 requires the development of 'significant' (over 200 dwellings) 'strategic' housing sites to comply with a Development Brief, or, where such a Brief is absent, to provide a Layout and Design Statement in accordance with Local Plan Policy BE1.
- 2.1.4 As drafted, Policy KP4 only states that they *"will be supported where they represent a comprehensive development scheme for the land in accordance with a Development Brief produced by Warwick District Council."* Whilst it is acknowledged that Warwick DC are preparing a Development Brief for adoption, in the unlikely event that this position changes the Neighbourhood Plan should be sufficiently flexible that it will not be out of date. As such, the draft policy should be more flexible and allow for development to come forward in accordance with a Development Brief or a Layout and Design Statement.
- 2.1.5 Finally, the land east of Kenilworth will not come forward as one comprehensive development in its entirety. Reference to a 'comprehensive development scheme' should be adjusted to ensure the policy is not overly restrictive. A more flexible approach would allow for discrete development parcels to come forward (for example for education development) for development independently, provided the overall allocations would not be undermined and there would be no impediment to the delivery of sustainable development. Text accompanying Warwick Local Plan Policy DS15 identifies that, the allocations are in multiple ownerships and accepts that development of the allocations may come forward separately. The Local Plan encourages landowners to work together and requests that proposals for development take account of one another to ensure integrated development but this is not a prerequisite.
- 2.1.6 In order to comply with Basic Condition e), to be compliant with Warwick Local Plan policies, and to ensure longevity, Policy KP4 should be amended to read as follows:
"Development proposals for housing and other uses on land released from the Green Belt east of Kenilworth, as shown on the Policies Map 5/2, will be supported where they are supported



by a Development Brief or a Layout and Design Statement and comprise the following principles....."

2.1.7 In addition, a number of criteria within draft Policy KP4 should be amended, again to ensure that the Neighbourhood Plan is able to meet the relevant Basic Conditions test. Further consideration should also be given to the following criteria:

- a. Warwick Local Plan Policies DS12 and ED2 identify and allocate land for education development. Specifically, land at Southcrest Farm is allocated under Policy ED2 for the provision of a secondary school, sixth form centre and *"if deemed the most appropriate location, a primary school."*

Bullet point a) of Policy KP4 does not reflect this allocation and in order to meet the requirements of Basic Condition e) and be compliant with the Local Plan it should be amended as follows:

"The provision of land for a secondary school and sixth form college on land at Southcrest Farm in accordance with Policies DS12 and ED2 of the Warwick Local Plan. A primary school to serve the 'northern parcel' of land should also be provided within the Warwick Local Plan Policy ED2 Southcrest Farm allocation, if this is deemed the most appropriate location."

- b. As drafted, this bullet point is not compliant with the test of Basic Condition e). The Warwick Local Plan Policy DS11 refers to the infrastructure requirements for the H06 residential allocation at Thickthorn ('southern land parcel' as referenced in the draft Neighbourhood Plan) as comprising a new primary school and a local centre.

It is therefore suggested that in order to meet the criteria of Basic Condition e) and ensure compliance with the policies of the statutory development plan (i.e. the Warwick Local Plan), bullet point b) of Policy KP4 should be amended to read:

"The provision of land for a new primary school on the southern land parcel (Warwick Local Plan Site Allocation H06) as set out in Policy DS11 of the Warwick Local Plan."

- e. The introduction of a requirement for the provision of self-build plots is in accordance with the Housing and Planning Act 2016 and Local Plan Policy H15 which supports self-build housing within Warwick and encourages Neighbourhood Plans to identify sites for self/custom build developments. It also notes that the District Council will produce a Supplementary Planning Document to assist in the delivery of self-build dwellings.

However, whilst the Local Plan identifies a 'register' which contains details of persons who are looking for self-build plots, there is no policy requirement for the provision of a certain number of self-build plots to be provided within development proposals.

The Neighbourhood Plan requirement, which effectively places a restrictive policy requirement on new development is a negative direction of travel and is objected to. This policy restriction, with no mechanism for release may only result in a delivery mechanism that does not deliver, and therefore does not boost the Council's housing supply.

The provision of self-build plots is not objected to in principle, but a positive policy approach should be employed; the identification of self-build plots should be on the basis of need and demand for the exact location rather than a blanket policy requirement; small windfall sites are likely to be more favoured by self-builders than a plot on a large estate. The practicalities of delivering such plots on a large strategic site should also be given further consideration with regard to differences in health and safety implications, working hours and the length of build programme for the site as a whole and individual plots. Viability matters are also relevant; the NPPG confirms that *"different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways."* (ID 10-009) and this should also be taken into consideration in the context of whether it is practical to deliver self-build plots on this strategic site.

It is therefore requested that the policy requirement is removed from Policy KP4. A policy could be developed for the Neighbourhood Plan to allow for the provision of serviced plots for self-build and custom build dwellings where the Council's Self-Build Register identifies a need and where there is demand for the location.

- h. Whilst the provision of a green corridor is supported, the detailed survey work that has been undertaken to support development of land at Crewe Lane and Woodside Training Centre has provided a greater understanding of the site constraints, which will impact on the overall design of the envisaged green corridor.

Namely, there is Priority Woodland (Victoria Spinney) and Orchard designations in the area of the site fronting Glasshouse Lane which will restrict the width and function of the green corridor. A new roundabout to provide site access off Glasshouse Lane is also necessary to enable the development to come forward but this will also restrict the function and character of the green corridor.

Notwithstanding the identified constraints, the emerging Masterplan being prepared by Catesby Estates proposes a 3 metre wide footway and cycleway along the frontage of Glasshouse Lane, flanked by Victoria Spinney and the retained orchard, and combined with new crossing points over Glasshouse Lane, as shown on the plan submitted with these representations at **Appendix 3**. The Neighbourhood Plan should ensure that the policy contains sufficient flexibility to allow for the provision of the green corridor to be flexible, taking into account the detailed information which is becoming available and informing the actual proposed site design.

- k. As set out in the NPPF, the historic environment and heritage assets should be conserved *"in a manner appropriate to their significance"*. Paras 133 and 134 in particular refer to the consideration of heritage assets whose significance has the potential to be affected as a result of development.

It is suggested that the wording of bullet point j) is amended to reflect national guidance in



the NPPF and Policies HE1-HE6 of the Warwick Local Plan. This would ensure that the Neighbourhood Plan can meet Basic Conditions a) and e), i.e. be in conformity with national and local planning policies.



2.2 Policy KP14

2.2.1 Draft Policy KP14 refers to General Design Principles. Reference to specific bullet points within the draft policy is made as follows:

- a. The bullet point should reflect Warwick Local Plan Policies HE1-H6 and NPPF para 126. The wording of bullet point j) should be amended to reflect national guidance in the NPPF, which would in turn be consistent with Policies HE1-HE6 of the Warwick Local Plan. As drafted the Neighbourhood Plan does not meet Basic Conditions a) and e), i.e. it is not in conformity with national and local planning policies.



2.3 Policy KP15

2.3.1 Draft Policy KP15 refers to local heritage assets but in order to comply with Basic Condition a) and be consistent with national policy its wording should be amended.

2.3.2 In order to meet Basic Condition a) and reflect national planning guidance, it is suggested that the policy is amended to reflect para 135 of the Framework and ensure that proposals that would/could affect the significance of such an asset are accompanied by a balanced judgement on the acceptability of the proposals with regard to the scale of any harm or loss and the significance of the asset. The text of the policy could be amended as follows:

"Proposals that affect directly or indirectly a non-designated heritage asset should be accompanied by a balanced judgement of the scale of harm or loss against the significance of the asset, in accordance with the NPPF."

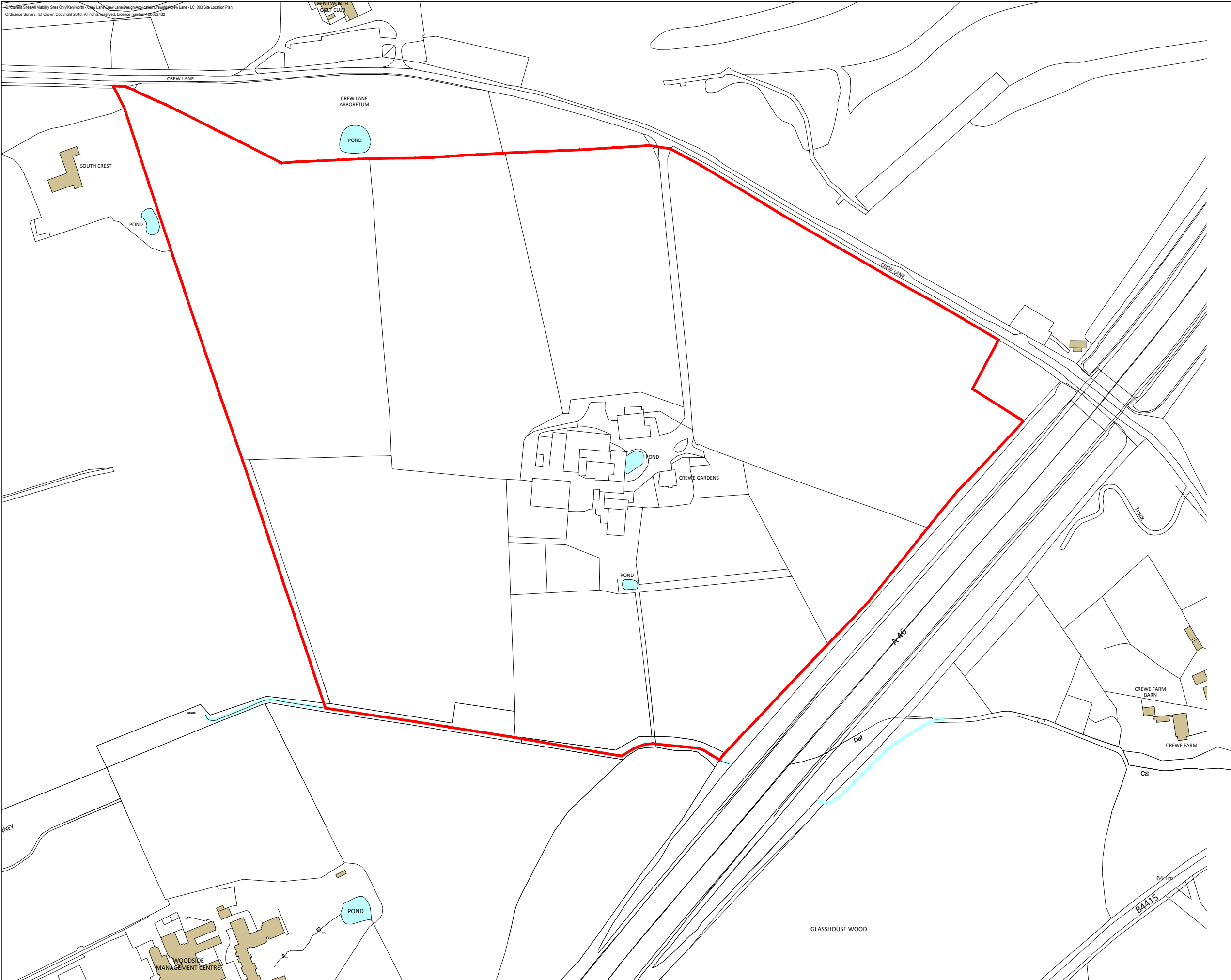


Appendices

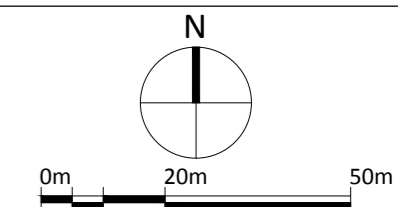


Appendix 1

Catesby Estates Land Interests



 SITE BOUNDARY 18.41 ha (45.49 acres)



Project Name:
**WOODSIDE MANAGEMENT AND TRAINING CENTRE,
 GLASSHOUSE LANE,
 KENILWORTH**

Drawing Title:
SITE LOCATION PLAN

Suffix:	Date:	Description:	Drawn:	Checked:
Revisions:				

O:\Current Sites\All Viability Sites Only\Kenilworth\Woodside\Design\Application Drawings\Woodside - LC-001 Site Location Plan				
Scale: 1/1250	Media/Orientation: A2L	Drawn: APC	Checked: APC	Day/Month/Year: 24/09/2015
Project No.:			Drawing No.:	
			LC/001	



Appendix 2

Representations made to the Pre-Submission Version of the Neighbourhood Plan



Kenilworth Town Neighbourhood Plan

Pre Submission Consultation

Tell us what you think!

Have we got it right?

Please indicate which of the following statements best reflects your views and explain further where necessary.

Please use separate forms for different issues.

- You have it pretty well right and I will be happy to support as it goes forward to a referendum
- The Plan would be improved if it included an additional policy
- The Plan would be clearer if a particular part was reworded
- I disagree with a particular statement or policy
- There is an error in the text or map

Comments –

Please see accompanying Statement prepared by WYG on behalf of Catesby Estates Ltd.

Please return your form to: Kenilworth Town Council,
Jubilee House, Smalley Place CV8 1QG; or email:
consult@kenilworth.org

Please add your contact details for further updates (optional).

Thank you for your help and interest. Please continue overleaf as necessary.



Representations to the Kenilworth Neighbourhood Plan

On Behalf of Catesby Estates Ltd

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S Butterfield	K Fenwick	K Fenwick



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Appendix 1 – Catesby Estates Ltd Land Interests

Appendix 2 – Joint Position Statement - land East of Kenilworth



1.0 Introduction

1.1 Overview and Background

- 1.1.1 WYG act on behalf of Catesby Estates Ltd in respect of their land interests at Woodside Management Centre and land south of Crew Lane, which fall within the Kenilworth Neighbourhood Plan Area and within the administrative boundary of Warwick District Council. The land interests are identified on the Plan at **Appendix 1**.
- 1.1.2 These representations are submitted to the Kenilworth Neighbourhood Plan Pre-Submission Plan, consulted on in accordance with the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42.
- 1.1.3 The Neighbourhood Plan is being promoted against the backdrop of the emerging Warwick District Local Plan. Whilst not adopted the Local Plan has been subject to independent examination and to a period of consultation on Main Modifications. The Local Plan is likely to be adopted prior to the making of the Kenilworth Neighbourhood Plan and it is therefore considered appropriate that the Neighbourhood Plan is developed on this basis as it will then be in general conformity with Local Plan strategic policies as required by NPPF para 184.
- 1.1.4 By way of background, prior to the publication of the Neighbourhood Plan Pre-Submission Plan, an early engagement meeting was held with Kenilworth Town Council on 19th September 2016. The meeting was attended by members of the Town Council plus the main landowners and site promoters of the various land interests for the proposed Local Plan land allocations on land east of Kenilworth. During the meeting a number of matters were discussed and agreed and a Joint Position Statement was submitted to the Inspector dealing with the emerging Local Plan Hearings. This is attached at **Appendix 2** for completeness.
- 1.1.5 Catesby Estates Ltd's land interests fall within the emerging Warwick Local Plan H40 allocation for residential development, to which draft Policy KP4 – Land East of Kenilworth in the Neighbourhood Plan refers.
- 1.1.6 The identification of land at Policy KP4 (land east of Kenilworth) is supported in principle. It accords with the Warwick Local Plan Site Allocations H06 and H40 which identify land east of Kenilworth, including Catesby Estates Ltd's land interests, for residential development of up to 1,400 dwellings plus employment and education development.
- 1.1.7 The detailed representations made to the Kenilworth Neighbourhood Plan Pre-Submission Plan are therefore concerned with matters of detail rather than principle. The representations comprise comments on the following policies:
- Policy KP4

- Policy KP14
- Policy KP15
- General Comments on Basic Conditions

1.1.8 In accordance with paragraph 8(2)(a) of Schedule 4B of the Town and Country Planning Act 1990 (As amended) the representations to the draft Neighbourhood Plan have been made with reference to the Basic Conditions within which the Neighbourhood Plan must comply, namely:

"(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,

(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,

(d) the making of the order contributes to the achievement of sustainable development,

(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

(f) the making of the order does not breach, and is otherwise compatible with, EU obligations and

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."

1.1.9 These representations are made on the basis that the emerging Warwick Local Plan will be adopted and will therefore be the 'Development Plan' to which test Basic Conditions criteria e) applies. It is therefore referred to as the Local Plan within the remainder of these representations.

1.1.10 Catesby Estates Ltd look forward to continued work with the Town Council in respect of the production of the Kenilworth Neighbourhood Plan and would be pleased to discuss any matters raised in these representations further as necessary.

2.0 Planning Policies of the Kenilworth Neighbourhood Plan

2.1 Policy KP4 – Land East of Kenilworth

- 2.1.1 The Town Council's acknowledgement of and support for the Warwick Local Plan allocations H06 and H40 within draft Policy KP4 – Land East of Kenilworth is supported in principle.
- 2.1.2 There are, however, some specific points which the Town Council should address to ensure that the draft policy fully complies with the Basic Conditions.
- 2.1.3 Firstly, the comprehensive masterplan required by draft Policy KP4 should be flexible, to ensure the policy is not overly restrictive. The requirement for a 'comprehensive masterplan' does not currently accord with Basic Condition e) as it would be contrary to relevant Warwick Local Plan policies.
- 2.1.4 Local Plan Policy BE2 requires the development of 'significant' (over 200 dwellings) housing sites to comply with a Development Brief, or, where such a Brief is absent, to provide a Layout and Design Statement in accordance with Local Plan Policy BE1.
- 2.1.5 In seeking to introduce a comprehensive Masterplan the Neighbourhood Plan would restrict the development of the land within the 'east of Kenilworth' allocation until such a masterplan was in place. A more flexible approach would allow for discrete development parcels to come forward (for example for education development) for development independently, provided the overall allocations would not be undermined and there would be no impediment to the delivery of sustainable development. Text accompanying Warwick Local Plan Policy DS15 identifies that, inter alia, the H06 and H40 allocations (known as land to the east of Kenilworth in the Pre-Submission Neighbourhood Plan) are in multiple ownerships and accepts that development of the allocations may come forward separately. The Local Plan encourages landowners to work together and requests that proposals for development take account of one another to ensure integrated development but this is not a prerequisite.
- 2.1.6 In order to meet Basic Condition e) and be compliant with Warwick Local Plan Policies BE1, BE2 and DS15, it is requested that draft Policy KP4 be amended to read: *"... as shown on the Policies Map, will be supported, where development proposals comply with any approved Development Brief, or where a Layout and Design Statement has been prepared. Development proposals should comply with the following principles: ..."*
- 2.1.7 Further consideration should also be given to some of the bullet points as drafted:
- Warwick Local Plan Policies DS12 and ED2 identify and allocate land for education development. Specifically, land at Southcrest Farm is allocated under Policy ED2 for the provision of a secondary school, sixth form centre and *"if deemed the most appropriate location, a primary school."*
- Bullet point a) of Policy KP4 should therefore reflect this allocation of land in order to meet the requirements of Basic Condition e) and be compliant with the Local Plan as follows:



"The provision of land for a secondary school and sixth form college on land at Southcrest Farm in accordance with Policies DS12 and ED2 of the Warwick Local Plan. A primary school to serve the 'northern parcel' of land should also be provided within the Warwick Local Plan Policy ED2 Southcrest Farm allocation, if this is deemed the most appropriate location."

- b. As drafted, this bullet point is not compliant with the test of Basic Condition e). The Warwick Local Plan Policy DS11 refers to the infrastructure requirements for the H06 residential allocation at Thickthorn (southern parcel of land east of Kenilworth as referred to in the Pre-Submission Neighbourhood Plan) comprising a new primary school and a local centre. It is therefore suggested that in order to meet the criteria of Basic Condition e) and ensure compliance with the policies of the statutory development plan (i.e. the Warwick Local Plan), bullet point b) of Policy KP4 should be amended to read:

"The provision of land for a new primary school on the southern land parcel (Warwick Local Plan Site Allocation H06) as set out in Policy DS11 of the Warwick Local Plan."

The text on Page 36 (6th paragraph) of the Pre-Submission Plan should also be amended to reflect these changes.

- d. In order to be compatible with the Local Plan and therefore Basic Condition e), reference should be made to Warwick Local Plan Policy H06 and the location of the proposed employment development, which is in the south of the overall KP4 allocation and known as 'Thickthorn'.
- e. The introduction of a requirement for the provision of self-build plots is in accordance with the Housing and Planning Act 2016 and Local Plan Policy HNEW1 which encourages self-build housing within Warwick. However, whilst the Local Plan identifies a 'register' which contains details of persons who are looking for self-build plots, there is no policy requirement for the provision of a certain number of self-build plots to be provided within development proposals. It is therefore requested that flexibility is built into this criteria, to allow for the release of self-build plots to housebuilders should there be no demand for their development via the self-build process.
- j. As set out in the NPPF, the historic environment and heritage assets should be conserved *"in a manner appropriate to their significance"*. Paras 133 and 134 in particular refer to the consideration of heritage assets whose significance has the potential to be affected as a result of development.

It is suggested that the wording of bullet point j) is amended to reflect national guidance in the NPPF and Policies HE1-HE6 of the Warwick Local Plan. This would ensure that the Neighbourhood Plan can meet Basic Conditions a) and e), i.e. be in conformity with national and local planning policies.

- k. It is requested that this bullet point be amended to allow for flexibility, i.e. in order to make allowance for individual parcels of land to come forwards for development independently.



This would be in accordance with the requirement for the development to be in accordance with a Development Brief or Design and Layout Statement at paras 2.1.4 and 2.1.5 above.

- 2.1.8 In the text supporting the draft policy, page 35 refers to 1,500 dwellings within the two allocations but the Local Plan allocations are for 1,400 dwellings. The Neighbourhood Plan text should be amended to reflect this.



2.2 Policy KP14

2.2.1 Draft Policy KP14 refers to General Design Principles. Reference to specific bullet points within the draft policy is made as follows:

- i. The bullet point should reflect Warwick Local Plan Policies HE1-HE6 and NPPF para 126. It is suggested that the wording of bullet point j) is amended to reflect national guidance in the NPPF, which would in turn be consistent with Policies HE1-HE6 of the Warwick Local Plan. This would ensure that the Neighbourhood Plan can meet Basic Conditions a) and e), i.e. be in conformity with national and local planning policies.
- ix. Clarification should be provided on bullet point ix). Apartment developments would not provide individual garden spaces per dwelling but rather shared open spaces. The wording of the bullet point should be amended to provide clarity on this.



2.3 Policy KP15

- 2.3.1 Draft Policy KP15 refers to local heritage assets but in order to comply with Basic Condition a) and be consistent with national policy it should be amended to ensure that appropriate consideration is given to such assets.
- 2.3.2 In order to meet Basic Condition a) and reflect national planning guidance, it is suggested that the policy is amended to reflect para 135 of the Framework and ensure that proposals that would/could affect the significance of such an asset are accompanied by a balanced judgement on the acceptability of the proposals with regard to the scale of any harm or loss and the significance of the asset.



2.4 General Comments

- 2.4.1 No Basic Conditions Statement has been published with the draft Neighbourhood Plan. Such a Statement must identify for each policy:
- (a) What the relevant NPPF paragraphs are;
 - (b) What the relevant provisions of the PPG are, with express reference back to the lead policy wording within the NPPF;
 - (c) Whether the proposed neighbourhood plan policy is specific in accordance with those NPPF and PPG paragraphs;
 - (d) Whether the neighbourhood plan policy is in accordance with the NPPF's overarching approach to neighbourhood planning at paragraphs 14, 16 and 184, read as a whole.
- 2.4.2 The Basic Conditions Statement is the key document for the Neighbourhood Plan to demonstrate compliance and must be prepared to accompany the further progression of the Kenilworth Neighbourhood Plan (PPG 070).
- 2.4.3 Furthermore, in accordance with Planning Practice Guidance 072, the qualifying body for a Neighbourhood Plan must identify that "*consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset.*" This is normally presented in the form of a Sustainability Appraisal. A Neighbourhood Plan that does not contribute to sustainable development will not be in accordance with national planning policy and will automatically infringe Basic Conditions a) and d).
- 2.4.4 A Sustainability Appraisal has not been published as part of the Kenilworth Neighbourhood Plan Pre-Submission Plan. This matter should be addressed in order that the Neighbourhood Plan can meet the requirements of Basic Conditions a) and d).

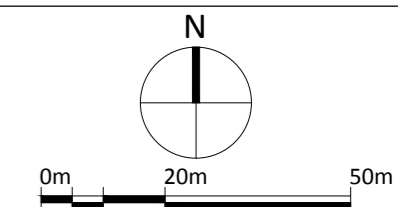


Appendices



Appendix 1

Catesby Estates Land Interests

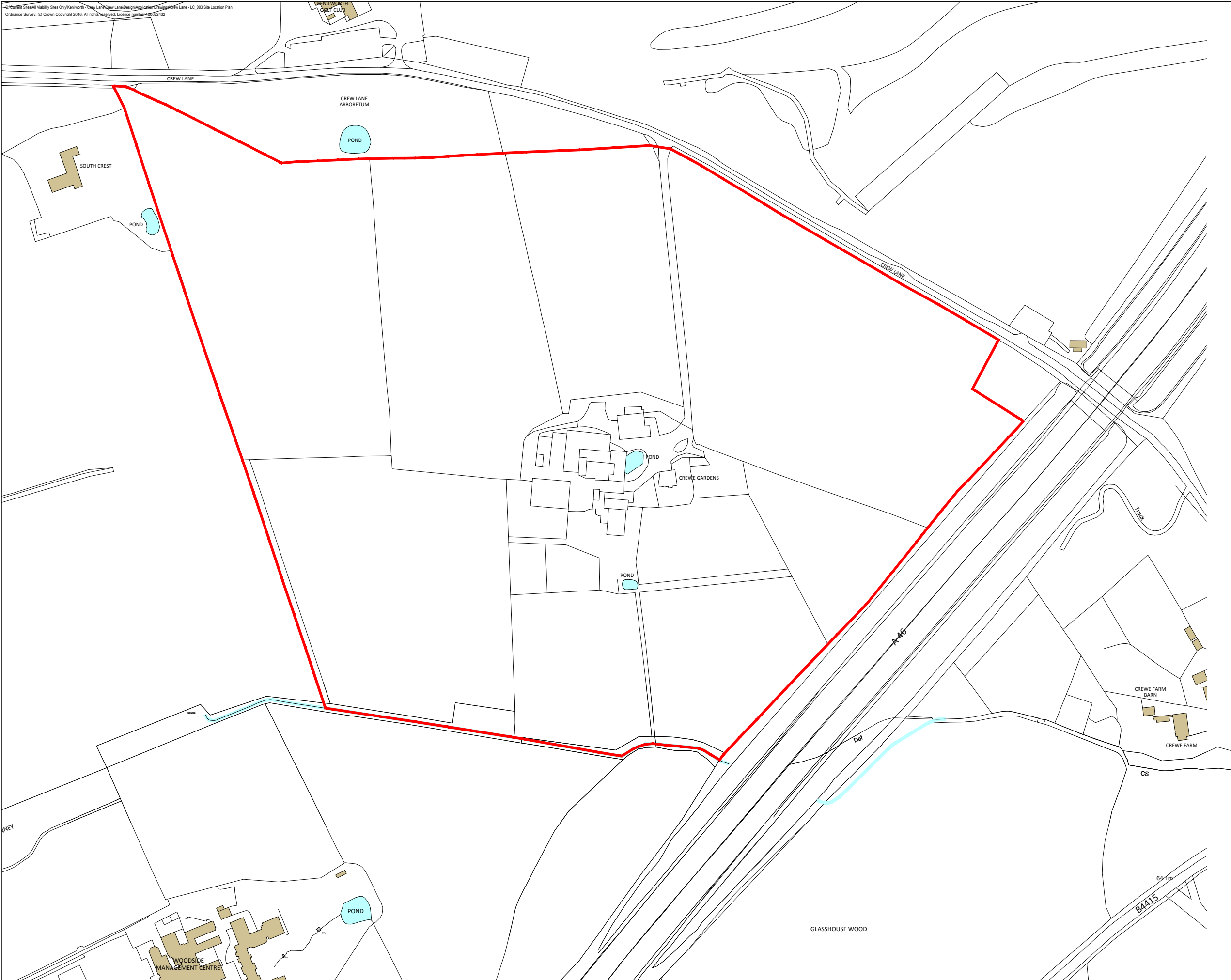


Project Name:
**WOODSIDE MANAGEMENT AND TRAINING CENTRE,
 GLASSHOUSE LANE,
 KENILWORTH**

Drawing Title:
SITE LOCATION PLAN

Suffix:	Date:	Description:	Drawn:	Checked:
Revisions:				

O:\Current Sites\All Viability Sites Only\Kenilworth\Woodside\Design\Application Drawings\Woodside - LC-001 Site Location Plan				
Scale: 1/1250	Media/Orientation: A2L	Drawn: APC	Checked: APC	Day/Month/Year: 24/09/2015
Project No.:			Drawing No.:	
-			LC/001	



 SITE BOUNDARY 18.41 ha (45.49 acres)



Appendix 2

Joint Position Statement – land East of Kenilworth

Joint Site Delivery Statement for land allocated under H06 – East of Kenilworth (Thickthorn) and H40 East of Kenilworth, (Crew Lane, Southcrest Farm and Woodside Training Centre)

1.0 Introduction

- 1.1 The East of Kenilworth direction for growth comprising Thickthorn and Crewe Lane; Southcrest Farm, and Woodside Training Centre are two of a number of strategic site allocations being proposed within the Submission Draft Warwick District Local Plan. In total the allocations will provide for circa 1400 homes and 8ha of employment land.
- 1.2 This joint site delivery statement is supported by Warwick District Council. It has been prepared in conjunction with the main landowners and site promoters of the various land interests including , the McDaide family trust, The Hibberd Family, Kenilworth Wardens, Kenilworth Rugby Club, Gleeson Developments; Catesby Estates, Mr Tibbatts and Stoneleigh Estates.
- 1.3 The purpose of the Statement is to inform the Warwick District Local Plan, Examination in Public, information on the following:-
- (i) Detail the key opportunities and strategic constraints of the sites to inform a high level illustrative concept plan;
 - (ii) Identify the key strategic infrastructure requirements in order to support Local Plan allocations and the issue of viability;
 - (iii) Advise on the collaborative working between the landowners/promoters, the District and Town Councils on the approach and evolution to the preparation of a draft illustrative concept plan for East of Kenilworth;
 - (iv) Provide information on the anticipated delivery timescales and build out rates.

2.0 The opportunity for the identification of the site as a strategic site allocation.

The concept rationale behind land East of Kenilworth is provided by the Submission Draft WDC Local Plan and further elaborated on the WDC Hearing Statements submitted by each interested party for Matter 7B.

3.0 Evolution of a high level illustrative concept plan.

With the support of Warwick District Council, Kenilworth Town Council has employed RCOH to prepare a concept framework plan for the strategic site

allocations in Kenilworth. This work will support both the Local Plan allocations and the emerging Kenilworth Neighbourhood Plan. The first meeting of stakeholders took place on 19th September 2016.

4.0 Key constraints and proposed mitigation.

There are no constraints applicable to the allocations which prevent development. All the submissions made by interested parties have been submitted with technical evidence demonstrating the deliverability of the sites proportionate to a Local Plan allocation. These demonstrate to the Inspector that there are not any technical impediments that would prevent the delivery of the allocations, subject to normal development management considerations and design detail which will be determined through planning applications.

5.0 Infrastructure requirements/costs and triggers.

WDC has provided detail relating to infrastructure in Page 5 of their EIP Hearing Statement. Further details have been provided by each of the land interests in their individual promotional material. There are no abnormal infrastructure costs associated with the east of Kenilworth direction for growth which cannot be dealt with during the application process. The new development will make contributions towards secondary education in accordance with relevant CIL Regulations.

6.0 Viability

Viability has been addressed by Page 4 of the Council's Hearing Statement for the EIP. The WDC Hearing Statement concludes: *"The 2013 CIL Viability Study (IN06) and its 2015 addendum (EXAM3) demonstrate that all broad locations in the District are viable in the context of the proposed Local Plan policy requirements, including affordable housing"*.

The promotional material submitted by the various land interests supports the deliverability of the development in submissions proportionate to the local plan process. Greater detail relating to specific site viability will continue to be developed as the sites move through the planning process with all parties committing to working with the Local Planning Authority and key stakeholders to ensure a deliverable and viable development takes place.

7.0 Delivery/phasing and implementation.

7.1 The total number of homes the two allocations east of Kenilworth will deliver is 1400 by the end of the Plan period. Details of the housing delivery for East of Kenilworth are set in Table 1.0 below. This is on the assumption that the WDC Local Plan is adopted and the concept master plan is agreed by all parties before Q2 2017. Should either of these scenarios be delayed the delivery timetable would need to be reviewed accordingly.

Year	2018 /19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27
Units	55	200	200	200	200	200	200	145	

7.2 The 8ha of employment land allocated will be readily available for development within the first five years after the Local Plan is adopted.

8.0 Project Governance and project management delivery Plan.

8.1 A project working forum of officers from WDC, WCC and representatives of the key landowners/promoters, supported by ATLAS is currently in the process of being established commencing with a first meeting on 19th September 2016. All parties have given a commitment to meeting as necessary to progress the eastern direction of growth. To support this early delivery a joint project parameters framework has been produced and agreed with the various landowners and promoters of the site and is attached as Appendix 1.

Appendix 3

Indicative Plan for Glasshouse Lane

