

## Warwick District Council

### Draft Development Brief for Land East of Kenilworth

- 1) These submissions are made on behalf of the Kenilworth Wardens Community Sports Club which provides substantial playing facilities to the existing resident community of Kenilworth and will provide formal sporting facilities for the new community at East Kenilworth. Kenilworth Wardens Cricket Club field give Saturday league teams in the Birmingham Premier League teams in the Birmingham Premier League and the Cotswold Hill League. The Club provides coaching for boys and girls aged from 7-18 and a Ladies team playing league cricket.
- 2) Kenilworth Wardens Football Club fields four senior teams in the Coventry and Leamington Leagues. The junior section is one of the largest in the locality with 21 teams between the ages of 7-16 and includes representation in the Midlands Junior Premier League. The Club holds Football Association (FA) chartered status at the higher standard of Development Club level and has FA Qualified Coaches at every age group.
- 3) This brief description of Kenilworth Wardens illustrates the significance of the Club to the provision of sports facilities for the local community.
- 4) Kenilworth Wardens supports the underlying intention of the Brief to provide specific guidance for a comprehensive development of the land east of Kenilworth as allocated in the Warwick District Plan. That said, it is fundamental to the planning process to have proper regards to the underlying objective of Kenilworth Wardens (and Kenilworth RFC) is to maximise the development value of the land holding in order to enable:
  - i. In order to relocate and establish new and enlarged sports facilities suitable for the existing and new resident of Kenilworth.
  - ii. In order to ensure that the development value realises sufficient capital value so that the Club is financially sustainable for the long term.

These objectives are matters of a wider community interest – and contrast distinctly with the objectives of other land owners to realise maximum value as a private interest.

- 5) It is in the context of the community interest of Kenilworth Wardens that the following submissions are made:

#### **Site Analysis Constraints and Opportunities**

- 6) The Brief refers at page 54 to 'other (constraints and opportunities). It is submitted that the Brief is deficient in not:
- i. Considering how the planning guidance will ensure the successful relocation and expansion of the two sports clubs.
  - ii. Identifying the opportunity comprehensive development may provide to deliver enhanced sports facilities to the existing and future community at Kenilworth.

#### **Vision and Objectives**

- 7) In failing to identify the constraints upon the existing sports clubs and the potential opportunities comprehensive development may deliver, the vision and objectives for the development are also deficient in failing to make reference to the particular circumstances of the sports clubs.
- 8) It is submitted that the Vision should include:

*'The development will lead to the successful and sustainable relocation of the existing sports clubs, enhancing in quality and quantity of sports pitch provision within the town'.*

- 9) The East of Kenilworth objectives should therefore include:
- Securing the delivery of replacement sports pitches, and an enhanced provision to meet the needs of the new community
- 10) This objective is entirely consistent with the provisions of Local Plan. Policy HS4 Improvements to Open Sports and Recreation Facilities – and especially in the circumstances of East of Kenilworth where formal sports pitch provision is reliant upon the relocation and expansion of the existing sports clubs.

## Development Principles

- 11) At page 97 the Draft SPD refers to Social and Community Infrastructure. Thereafter a subheading is titled Biodiversity, Greenspace, Play and Recreation Provisions. The Brief states:

*‘Overall there is a wider provision of open space in Kenilworth particularly in Park Hill and St. Johns Wards which the site falls. Whilst applicant are not expected to address an existing deficiency, the need for open space **and the type of space to be provided within the development site should be considered in this context**’ (emphasis added).*

- 12) Table 3 Identifies ‘Potential Open Space Requirements’ but makes no provision for ‘outdoor sport’ and is not consistent with Policy HS4. It is submitted that the Development Brief should make a requirement for developers at East of Kenilworth to make an appropriate financial contribution towards the provision of outdoor sports facilities, the demand for which arises from the proposed housing development. Where the LPA is reliant upon these enhanced facilities being provided by Kenworth Wardens and KRFC, such contributions should be made available to the Clubs to assist with the relocation and expansion of facilities. This arrangement is consistent with the statement at page 107:

*‘Contributions will be required towards further off-site sports and leisure facilities’.*

- 13) The underlying concern of Kenilworth Wardens is that the provisions of the Development Brief for their existing sports ground may generate insufficient land value to enable a successful and sustainable relocation and enhancement of sports pitches facilities. The land use proposals for their land holding compound this situation as explained below.

## Education Facilities

- 14) The location shown on the illustrative masterplan for primary school location is ‘within the central parcel of land’ on the existing sports grounds where the maximisation of development value is required in the overall public interest. It would appear that in considering the merits of this location,

no consideration has been given to the development implications for Kenilworth Wardens. In short form the Brief prejudices the successful relocation of Kenilworth Wardens.

- 15) It is understood that there have been recent discussions with the developers of the northern section and section concerning the provision of two single form entry schools to serve these developments. This proposal is evidently supported by the Country Education Authority.
- 16) Kenilworth Wardens support this revised proposal for the provision of primary education in an endeavour to realise sufficient development value to achieve a successful and sustainable relocation of the Club. The identification of a primary school on the Kenilworth Wardens land holding should be deleted accordingly

### **Chapter 8 Shaping the Indicative Master Plan**

### **Chapter 9 Master Plan and Scale Parameters Plan**

- 17) The Spatial Concept Plan (Figure 5.3) Land Use (Figure 5.4, and Housing Density (Figure 55) plans should be revised to identify housing development across the entirety of Kenilworth Wardens land holding in an endeavour to optimise land value so as to achieve relocation and expansion of sports pitches and associated facilities in the overall public interest.
- 18) The Indicative Site Masterplan (Figure 10) and Indicative Scale Parameters Plan (Figure 61) should be similarly amended to remove the siting of school provision on the Kenilworth Wardens site.

### **Chapter 10 Delivery**

- 19) The delivery of housing on the Kenilworth Wardens Site necessitates the realisation of a capital receipt from the land to enable replacement facilities to be provided PRIOR to the loss of the existing sports facilities. In this context, the development brief should encourage the release of Kenilworth Wardens site at an early stage of the development.
- 20) It is submitted that redevelopment of the Kenilworth Warden's site is not dependent upon the 'central section of Glasshouse Lane between the two roundabout junctions' being upgraded. It is submitted that the scale of housing which could be accommodated on Kenilworth Wardens sports ground would not result in a 'severe' residual cumulative impact on the road network. For the reasoning that has been set out, the provisions of the Brief should fully recognise the special

