

Kenilworth Town Council Response to the draft South Warwickshire Local Plan

Introduction

Kenilworth Town Council (KTC) wishes to take the opportunity to share its views on the draft South Warwickshire Local Plan (SWLP) prior to the Councils' decision to issue it for the regulation 19 process. KTC has provided consultation responses at both the Issues & Options and Preferred Options stages.

The Council supports the principle of sustainable growth and recognises the need to provide homes, employment opportunities and supporting infrastructure across South Warwickshire to 2050.

- 1) However, KTC's response is founded on a single overarching principle:

Kenilworth has experienced significant development under the current plan, yet **supporting infrastructure** has either been delayed or failed to appear. Therefore, for any new plan, further development must be infrastructure-led, not development-led; and sustainable sites identified in line with policy, not driven by developers' site selection.

- 2) KTC has **serious concerns about the allocation of site KEN.1** for housing, as expressed at the Issues & Options and Preferred Options stages. These concerns have not been addressed in the current draft, and indeed the Councils' previous consultants' assessments which pointed towards the inappropriateness of development at this location appear to have overruled and/or changed without any proper justification.

We address both these points below.

1) An Infrastructure-Led Approach to Sustainable Growth

The SWLP acknowledges that growth should be supported by the provision of appropriate infrastructure, including transport facilities, schools, healthcare and other community services, delivered in the right place and at the right time. However, Kenilworth's recent experience demonstrates that this objective has not always been achieved in practice.

Warwick District is already a growing area. The 2021 Census recorded approximately 148,500 residents living in around 62,600 households. Current forecasts indicate that the District's population could increase to approximately 173,000 over the coming decades.

Against this backdrop, Kenilworth's population is projected to rise from its historic level of approximately 23,000 residents to around 28,000 by 2030 - an increase of almost 20%. Yet the investment in transport infrastructure, healthcare provision, educational capacity and utilities has not kept pace with this growth.

Our communities are highly educated, engaged and diverse geographically, socio-economically and ethnically. Residents understand the need for new homes and employment opportunities, but they rightly expect that the supporting infrastructure should be delivered before, or at the very least alongside, development. Increasingly, residents perceive that infrastructure commitments are either delayed, watered down or deferred, whilst housing development continues unabated.

The Cumulative Infrastructure Burden

KTC is particularly concerned that the SWLP does not adequately recognise the cumulative infrastructure burden already affecting Kenilworth and surrounding communities, as part of the 20% growth Kenilworth has already seen over the current Local Plan period.

Growth proposals should not be assessed in isolation. The Plan must take account of the combined impacts of:

- Existing housing allocations and developments;
- Historic infrastructure deficits;
- Increasing demand on healthcare and education services;
- Utility capacity constraints;
- Climate resilience requirements; and
- The continuing disruption associated with the construction of HS2.

The impact of HS2 on Kenilworth and the surrounding area has been significant. Over many years local communities have experienced road closures, diversions, traffic management measures, loss of access routes, construction traffic and environmental disruption. Major routes, including the A46, A429, Dalehouse Lane, Crackley Lane, Cromwell Lane, and numerous local roads, have been affected by sustained works programmes.

In 2026 the Department for Transport revealed more than 160 HS2-related roadwork schemes on England's strategic road network since 2017, including repeated works on the A46 between Stoneleigh and Kenilworth. The same analysis estimated that HS2-related traffic management measures had resulted in approximately 200 million hours of cumulative delays across affected routes. The A46 corridor through Warwickshire was specifically identified as an area experiencing ongoing disruption.

This existing burden must be properly recognised when assessing the capacity of local communities to accommodate further growth.

Transport and Highway Capacity

Transport capacity remains one of the most significant concerns for local residents.

Existing congestion and safety issues already affect:

- St John's Gyratory;
- Thickthorn Island;
- Warwick Road / Rouncil Lane junction;
- The A452 corridor;
- Connections with the A46 strategic road network; and
- Routes affected by HS2-related traffic management.
- Glasshouse Lane / Leyes Lane / Kenilworth School

The cumulative impact of completed developments, existing commitments and future allocations has not yet been adequately demonstrated. KTC considers that all major allocations should be supported by comprehensive transport modelling that reflects cumulative growth impacts and identifies fully funded mitigation measures. This does not appear to be the case in the current assessments we have seen.

No significant development should proceed until transport interventions have secured funding, approvals and delivery programmes.

Healthcare Provision

Healthcare capacity is already stretched.

The Kenilworth and Warwick Primary Care Network serves approximately 63,500 patients across five GP practices. KTC understands that the Primary Care Network has identified a requirement for approximately 15 additional consulting rooms simply to accommodate growth arising from developments already approved.

Further housing allocations should therefore be conditional upon:

- NHS confirmation of future capacity requirements;
- Funding for additional facilities;
- Delivery of additional consulting space; and
- Provision of the workforce needed to operate those facilities.

The construction of buildings alone is insufficient if appropriate clinical staffing cannot be secured.

Secondary Education

KTC is also concerned about secondary school capacity and the potential impact, if further housing is allocated within Kenilworth, on Kenilworth's cohesion if its population can no longer attend one common secondary school. This was a key component of constructing the new expanded school (completed in 2023) within the last local plan. This point was made at the previous stages but does not appear to have been taken on board.

Kenilworth School and Sixth Form is understood to be operating at or close to its practical capacity of approximately 2,300 pupils, taking account of the existing planned growth in the town. Additional population growth will inevitably generate increased demand for school

places. KTC does not see any proper consideration in the material so far available of the implications for the catchment of Kenilworth School and the divisiveness and change to the community character of the town if this were to occur.

Utilities Infrastructure

The SWLP currently provides insufficient assurance regarding utility capacity.

Before any development proceeds, utility providers should be required to certify that adequate capacity exists within:

- Electricity distribution networks;
- Water supply networks;
- Wastewater and sewerage systems;
- Surface water management infrastructure; and
- High-speed digital connectivity.

Recent experience across the region suggests that utility upgrades are frequently reactive rather than planned in advance. This approach is incompatible with sustainable development.

This is a particular issue in terms of sewerage at Rouncil Lane where there have been longstanding problems with very unpleasant odours and foul water overflow in the systems (associated with the abattoir which is understood to be expanding, and has involved complex discussion so far with Severn Trent, the Environment Agency and local councillors & Kenilworth's MP).

Giving the Infrastructure Delivery Plan Real Teeth

KTC strongly supports the inclusion of an Infrastructure Delivery Plan (IDP) within the SWLP. However, the IDP must become a binding delivery mechanism rather than a supporting document.

The delayed delivery of the spine road serving the Land East of Kenilworth development illustrates the consequences of poor sequencing. Residents have experienced years of disruption, inadequate pedestrian infrastructure, insufficient cycle routes and pressure on existing roads because development has proceeded ahead of key infrastructure.

The same is true with the ongoing lack of safe pedestrian infrastructure (i.e. no pavements or crossings) at the Glasshouse Lane developments and at Kenilworth Gate. This has caused significant highway safety concerns for the community.

KTC is also concerned by the lack of transparency surrounding the use of "exceptional circumstances" that may allow developers to defer, vary or avoid infrastructure commitments. The Plan should clearly identify:

- Who determines exceptional circumstances;
- The evidential threshold required;
- The role of local authorities and communities;
- Independent scrutiny arrangements; and

- Appropriate enforcement mechanisms.
- Recommended Infrastructure Benchmark

KTC recommends that the SWLP adopt a mandatory Infrastructure Readiness Test for all strategic allocations.

No major phase of development should proceed unless:

- Infrastructure funding and a clear plan for up front delivery has been secured;
- Delivery contracts have been entered into;
- Relevant planning approvals have been obtained;
- Utility providers have confirmed available capacity;
- NHS partners have confirmed healthcare provision;
- Education capacity has been secured;
- Transport mitigation measures have been approved and programmed; and
- Critical infrastructure delivery is independently monitored and publicly reported.

2) KEN.1

KTC has significant concerns regarding the proposed allocation at KEN.1, as explained by reference to the wider infrastructure points above.

Moreover, there are clear reasons why this site is not suitable as a Strategic Growth Location. These have been pointed at by KTC in both previous consultation responses but no adjustment made.

A. Infrastructure for KEN.1

- Whilst the allocation identifies a major area for future growth, there is currently insufficient evidence demonstrating how critical supporting infrastructure will be delivered, or delivered in such a way as would enable this site to remain viable, particularly for the planned level (50%) of affordable housing.
- Rouncil Lane is a country lane with poor road surface which already experiences significant traffic volumes including heavy good vehicles including livestock transport to and from the abattoir (which is understood to be expanding following closure of the Wrexham site). Rounds Hill is a quiet residential street. An increase in traffic already predicted with the development of the Rouncil Lane Sixth Form site, and now the Leek Wootton police headquarters development.
- It already serves as an existing route to connect Leek Wootton and Kenilworth, and traffic is already funnelled via the Warwick Road / Rouncil Lane junction which is increasingly congested.

- There are already significant issues associated with the highway changes needed at Woodcote Lane / Warwick Road to cater for the Police development – in terms of a one-way system.
- The area has no current public transport provision. This new development would not constitute a 20-minute neighbourhood, there is no GP, bus/train or secondary school within the required radius and existing schools are already oversubscribed.
- Kenilworth is not a big employment centre. With the development of employment land at Thickthorn stalling this is unlikely to change. It makes the potential for people to work locally unlikely, leading to further traffic challenges.
- There are major issues already with foul drainage capacity as explained above, and associated with the abattoir – giving rise to long-standing environmental health problems for residents of Rouncil Lane. Adding another 750 homes without solving this issue and/or requiring major new infrastructure will only exacerbate the existing problems and save them up further for any future residents of these homes.
- There is also little detail about improvements required for:
 - Digital and telecommunications infrastructure
 - Community facilities.
 - Electricity network capacity;
 - Water supply infrastructure;
- The Local Plan should require utility providers and infrastructure agencies to publish clear, costed and deliverable investment programmes before strategic allocations are progressed. Otherwise, the Councils cannot be clear that the location would be viable or deliverable.

B. Heritage impacts and Greenbelt policy

- KTC remains significantly concerned regarding the likely adverse impact of development at KEN.1 on the historic character, setting and landscape of Kenilworth, and in particular the Grade 1 listed Kenilworth Castle, its registered parks and gardens (Grade 2* listed) and the wider setting thereof. The Council does not appear to have taken on board the importance of these issues despite its previous assessments and the position of Historic England, explained below; and its response is inconclusive.
- KTC, the freeholder of the Castle, has since been engaging with English Heritage, its custodians, in order to provide a unified response at the regulation 19 stage in due course.
- The area of open land within KEN.1 to the north of Rouncil Lane forms part of the wider setting of Kenilworth Castle and the historic landscape associated with it. This area was part of the Castle's former Old or Great Park which in 1581 was stocked with 'deer and wild beasts,' and lay to the south of the Mere and to the north of Rouncil Lane. The listing explains that it dates back to 11th century and was disparked in the

mid 17th century, and laid out into agricultural use – with farms such as Castle Farm and Oaks Farm which are adjacent to the boundary of KEN.01, and other scheduled monuments such as the Fish ponds.

- For centuries, this open countryside has provided an important visual buffer to the west of the Castle, preserving long-established views (especially from the rooms of Leicester's building, built by Robert Dudley for the visit of Elizabeth I just over 450 years ago) and allowing residents and visitors to appreciate the Castle's prominence within its historic landscape setting, a remarkable set of vistas which have remained unchanged for nearly 1,000 years. Development across this open land would urbanise an area that currently contributes to the significance of one of Warwickshire's most important heritage assets, a Grade 1 listed building and its Grade 2* Registered Parks & Gardens, along with other protected heritage assets, eroding the sense of openness and historical connection that helps define the Castle's setting.
- Similarly, there are important views of the Castle from KEN.1 itself and the footpaths that cross it, again showing the interconnectedness and intervisibility between the Old Park and the Castle.
- The introduction of large-scale housing, roads, street lighting and associated infrastructure would interrupt historic views, diminish the rural approach to the town and result in the permanent loss of a landscape that has strong historical and cultural associations with Kenilworth's medieval heritage.
- KTC believes that any assessment of KEN.1 must give substantial weight to the preservation of these heritage assets and their settings, and must demonstrate that development would not cause unacceptable harm to the historic character, landscape quality and distinctive identity of Kenilworth. This is also highly relevant to its status as Greenbelt.
- This was the view of the Councils' own assessment too. The Councils' Heritage & Settlement Sensitivity Assessment (Place Services, 2022) designated the part of the site to the north of Rouncil Lane as Red and not suitable to accommodate development:

“West: The western side of the settlement comprises the area to the north of Rouncil Lane, which follows the former line of the park pale and the A452. It contains Kenilworth Castle, the Registered park and garden, Kenilworth abbey and part of the historic urban area, with numerous Listed Buildings. This entirety of the west side of the town is highly sensitive and susceptible to change. The heritage assets retain their links to the rural landscape which provides an important contribution to the significance of these assets. There is little scope for the accommodation of development in this area.” (see p 119)

- Further, Historic England registered a Potential Objection at the Preferred Options stage as follows (underlining added), and asked that this site be removed from the allocation:

“Potential objection: development would harm the significance of Kenilworth Castle, as the site includes part of the deer park to Kenilworth Castle that contributes to the significance of the castle. The deer park is a well-preserved earthwork visible on the ground and on LiDAR (may have been a number of alignments as medieval deer park expands and contract over the period of their use).

Also, high level of concerns: development here has the potential to cause harm to the setting of Kenilworth Castle (Listed Building Grade 1) and Residential Parks and Gardens (G2 listed).*

Recommend: a Heritage Impact Assessment prior to allocation.

However, we would prefer this Strategic Growth Location not to be carried forward into the Reg 19 plan in its current form and for the areas that contribute to the significance of Kenilworth Castle to be removed.”

- The Councils’ subsequent short 2026 Heritage Impact Assessment does not identify its authors or their expertise, and appears to seek to minimise the impacts on the important heritage assets of the Castle and the wider setting, by reference to suggestions of limited intervisibility; it is lacking in any detail or supporting evidence for this. Moreover, we consider this is incorrect. And it is despite the Councils’ own previous assessment in 2022 and the views of Historic England, both set out above. One key alternative put forward is to remove at least the part of KEN.1 north of Rouncil lane from the allocation, but no conclusion or recommendation to this effect has been brought forward.
- KTC’s view, having engaged with English Heritage and considered the position in detail, is that in Heritage terms this allocation is unsuitable.
- Greenbelt land should not be treated as Greybelt in line with government policy where the application of heritage policies in NPPF paragraph 7 would provide a strong reason for refusing or restricting development¹. That is clearly the case here.
- This means that the site is not suitable for consideration to come out of the Greenbelt, separately from considering the other strong contributions to the Greenbelt served by it, in terms of its function as part of the historic town and preventing urban sprawl.

¹ This states: “consider whether applying the policies relating to the areas or assets of particular importance in [footnote 7 to the NPPF](#) (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area.” Footnote 7 of the NPPF provides as follows: (7) The policies referred to are those in this Framework [re]designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);

...

The Greenbelt assessment is wrong on all these issues and directly contrary to the 2015 Greenbelt assessment which assessed it as making a strong contribution.

- As to these, it is correct that KEN.1 makes a strong contribution to the purposes of the Greenbelt in line with Government Guidance in the NPPF: it is free of existing development and forms an integral part of the setting of the historic town. Moreover, it is an important buffer for the gap between Kenilworth and Leek Wootton, Beausale and Warwick and serves the purpose of green belt to stop villages merging (coalescence). It would extend the Kenilworth boundary into the countryside with no existing physical boundary for redesignation of green belt.

Conclusion

There is a clear and well-evidenced basis which makes allocation of KEN.1 unsound: its place as part of the wider setting of Kenilworth Castle is very important. This policy objection is fundamental and has been recognised by the Councils' own experts and the statutory heritage consultee. KEN.1 should be removed from the Plan before it is submitted to the Inspectorate.

Further, whilst KTC supports sustainable growth and recognises the need to plan positively for South Warwickshire's future, the evidence from Kenilworth demonstrates that development has frequently outpaced the delivery of supporting infrastructure.

The combination of significant housing growth, continuing HS2 disruption (and likely to continue until trains start running in the late 2030's), constrained highway capacity, pressure on GP services, limited secondary school capacity and uncertainty regarding utility provision has created a substantial cumulative infrastructure burden on the town.

KTC therefore urges Stratford-on-Avon District Council and Warwick District Council to i) remove KEN.1 from the Plan and ii) in any event to strengthen the South Warwickshire Local Plan by embedding a genuinely infrastructure-led approach. Infrastructure must not be an aspiration that follows development; it must be a prerequisite for it.