

Title: South Warwickshire Local Plan – Publication (Regulation 19 Plan)  
Lead Officer: John Careford – Head of South Warwickshire Local Plan at Stratford-on-Avon District Council (01789 260801), and Philip Clarke – Head of Place, Arts & Economy at Warwick District Council (01926 456518)

Portfolio Holder: Councillor G Cowcher and Councillor C King

Wards of the District directly affected: All wards across Warwick District Council and Stratford on Avon District Council

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### Summary

The purpose of this report is to ask for the Joint Cabinet Committee to recommend to the Councils of Stratford-on-Avon District Council (SDC) and Warwick District Council (WDC) that the South Warwickshire Local Plan (SWLP) is approved for a six week public consultation (period for representations) in accordance with Regulation 19 of the Town and County Planning (Local Planning) (England) Regulation 2012.

### Recommendations

It is recommended to the Councils of Stratford-on-Avon District Council and Warwick District Council that both Councils:-

- (1) note the importance of a having sound, up-to-date local plan to prevent the uncoordinated delivery of potentially less favourable sites for development and maximise the delivery of infrastructure to support development, noting also the particular importance of this given that neither district currently can demonstrate a five-year supply of housing land.
- (2) note the importance of submitting a Local Plan to the Secretary of State by 31 December 2026 in light of the Government's declared intention that Local Plans prepared under current regulations cannot be submitted after that time.
- (3) endorse the extensive work that has been undertaken by officers and Councillors to prepare the South Warwickshire Local Plan and the previous public consultations that have been undertaken on it, and note that further work on plan viability is underway which will be presented as an addendum to this report.
- (4) approve:-
  - a) the Publication draft South Warwickshire Local Plan (appendix 1) together with
  - b) the Publication draft policies map ([appendix 2](#)),
  - c) Sustainability Appraisal report (appendix 3),
  - d) Habitats Regulation Assessment (appendix 4),
  - e) Consultation Statement (summary) (appendix 5),

- f) Equalities Impact Assessment (appendix 6)
- g) Effective Cooperation Compliance Statement (appendix 7) and
- h) the supporting evidence base (together the “proposed submission documents”)

for a six-week public consultation (period for representations) in accordance with Regulation 19 of the Town and County Planning (Local Planning) (England) Regulation 2012, subject to the other Council also approving these documents also.

- (5) delegate authority to the Head of Place, Arts & Economy (Warwick District) and Head of South Warwickshire Local Plan (Stratford-on-Avon District), in consultation with the leaders and relevant portfolio holders of both Councils, to make minor amendments and corrections as necessary to the proposed submission documents (including evidence base documents) prior to the commencement of the public consultation.
- (6) note that all the above recommendations require to be agreed by both Councils in order for the South Warwickshire Local Plan to progress to a Publication Regulation 19 consultation.
- (7) note that once the Regulation 19 consultation has been undertaken, the opportunities for either Council to make changes to the South Warwickshire Local Plan are very limited.
- (8) note that the South Warwickshire Local Plan will need to be considered and approved for Submission by both Councils prior to it being submitted to the Secretary of State for Examination, by 31<sup>st</sup> December 2026.

## **1 Background/Information**

- 1.1 Work on a joint Local Plan for both Stratford and Warwick District Councils, called the South Warwickshire Local Plan (SWLP), has been underway since early 2021. Preparing a Local Plan is not a one-off event and includes several stages of preparation and public consultation. In terms of the SWLP, this is the fourth stage of preparation and follows on from the Scoping and Call for Sites Consultation (summer 2021), Issues & Options consultation (January 2023) and Preferred Options consultation (January 2025). During all these previous stages, the Councils have also undertaken ‘Call for Sites’ exercises, inviting land-owners and promoters to propose sites to be considered for inclusion in the plan. More information about the previous consultations is available at [www.southwarwickshire.org.uk/swlp](http://www.southwarwickshire.org.uk/swlp).
- 1.2 The stages of plan-preparation for the SWLP are as follows:
  - 1. Scoping and Call for Sites (including public consultation)
  - 2. Issues and Options (including a Call for Sites) (including public consultation)
  - 3. Preferred Options (including public consultation)
  - 4. Publication (including public consultation) – THIS STAGE
  - 5. Submission
  - 6. Examination

7. Main Modifications (including public consultation)

8. Adoption.

- 1.3 The timetable for preparing the SWLP has been kept under review and was updated most recently in December 2025 and is reflected in the updated Local Development Schemes (LDS) of both Councils. The Warwick District LDS was updated on 18<sup>th</sup> March 2026 and the Stratford-on-Avon District LDS on 20<sup>th</sup> April. This report has been prepared in accordance with that timetable.

### **The importance of having an up-to-date Local Plan**

- 1.4 Government planning policy is clear that all local planning authorities should prepare local plans to cover their area. Furthermore, the policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. The government's National Planning Policy Framework (NPPF) states in paragraph 15: *"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings."*
- 1.5 Having an up-to-date Local Plan is important to both Councils for the following reasons:-
- It allows the Councils to manage where development occurs and prevent unplanned development. This is particularly relevant now as neither Stratford nor Warwick districts have a 5-year supply of housing land. Not having a 5-year supply of housing land changes the planning basis on which planning decisions in relation to housing proposals need to be made.
  - It provides the best opportunity to deliver the infrastructure that communities need in a timely manner. Councils can plan for requirements for major infrastructure in allocating land in a way that is not possible when speculative applications are coming forward. For example, new secondary schools will nearly always serve growth across a number of sites, and so the preferred site for a secondary school needs to be allocated through the local plan.
  - Maximises the ability to deliver community facilities and benefits including through s106 agreements and CIL. As well as delivering necessary infrastructure, a local plan can help deliver community priorities in a local area, supporting existing communities alongside the new residents that will be living in the district.
  - Allows the Councils to deliver on our ambitions, and locally specific policies, for example in response to the climate change emergency. If the Council wishes to prioritise matters such as increasing the density of new development, supporting 20-minute neighbourhoods, promoting the recycling of brownfield land and supporting the climate emergency, this can best be done through a local plan.
- 1.6 The current lack of a five-year supply of housing land is a serious issue for both Councils. As members will be aware, not having a five-year supply of housing land leaves the Councils open to speculative planning applications that may not accord with the policies and allocations in the current local plan. In these circumstances, Councils are required by government to consider such planning applications positively. The local planning authorities should not refuse planning

applications simply because they are not on land that is allocated in the Local Plan or Core Strategy but are required to weigh the benefits of a proposed development against its potential harms. If the adverse impacts do not significantly and demonstrably outweigh the benefits, planning permission should be granted. This approach to decision taking is known as the “tilted balance” in accordance with paragraph 11 of the NPPF.

### **The regulatory framework for Local Plan preparation**

- 1.7 The NPPF provides the Government’s framework for planning. The current NPPF (and the version the SWLP is being prepared in accordance with) is dated December 2024. It should be noted that in December 2025 the Government has published a consultation draft to the NPPF proposing significant changes. Paragraph 1 states that the NPPF *“sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.”*
- 1.8 Central government requires all local authorities to prepare a Local Plan. Through the NPPF and Planning Practice Guidance, they provide a clear framework for the preparation of the plan including providing guidance on meeting housing and employment land needs.
- 1.9 In order for a Local Plan to be adopted by a local authority, it has to be found ‘sound’ by an Inspector, appointed by the Secretary of State. If a Council is unable to demonstrate that its plan accords with national planning policy or does not have a deliverable plan with what the Inspector deems to be sufficient housing and employment land with supporting infrastructure, the plan will be found not to be sound.
- 1.10 One of the key requirements of a Local Plan is to meet the housing needs of the area. The government has developed a “standard method” for establishing local housing need. The concept of a “standard method” has been in place for several years however it was significantly revised by the current government in 2024. At the time when the Preferred Options SWLP was approved in December 2024, the current approach in applying the “standard method” had not been finally confirmed, and so two different housing needs figures were included in that document. With the “standard method” now confirmed, these figures have been used to prepare the SWLP.
- 1.11 Whilst the NPPF doesn’t provide a standard method for calculating employment need, the national Planning Practice Guidance does provide detailed guidance on determining the type of employment land needed and how to evidence that need. This has been followed in preparing the SWLP.
- 1.12 As noted above, the Government has introduced a new plan-making system. The enabling legislation for this (the Levelling Up & Regeneration Act 2023) was brought in by the previous government however it is being taken forward by the current government and has been in force since March of this year. This new plan-making system is significantly different from the current system (now referred to as the legacy system). Where appropriate, local planning authorities (LPAs) are encouraged to start to prepare a plan as soon as possible in the new system to get an up-to-date plan in place. However, where plan-making work is well underway, authorities are permitted to continue preparing these under the legacy system provided that plans are submitted to the

Secretary of State by 31<sup>st</sup> December 2026. This is the case with the SWLP. It is therefore important that progress is made on the SWLP such that it can be submitted by this time. This Publication (Regulation 19) stage is an important milestone to achieving this objective.

### **Work to date on the South Warwickshire Local Plan**

1.13 There has been a great deal of work, undertaken by both officers and Councillors of both Councils over many years, to inform the SWLP that is before members today. This report is not the place to go back through that history. For more details on the background to the SWLP, members are directed to previous reports to the Joint Cabinet Committee and in particular the following:-

- Scoping report ([14 April 2021](#))
- Issues and options report ([7 December 2022](#))
- Preferred Options report ([12 December 2024](#))

Officers would like to take this opportunity to thank the Members of the Advisory Group, past and present, for their assistance in preparing the SWLP.

1.14 Following the approval in December 2024 to consult on the Preferred Options document, officers undertook a public consultation between 10<sup>th</sup> January and 7<sup>th</sup> March 2025. A number of briefings and roadshows were held across South Warwickshire during this period. The Preferred Options document was divided into 12 chapters and contained 113 questions. The consultation generated over 22,600 consultation responses from over 5,800 individuals, groups and organisations. These have now been analysed and a report summarising and analysing the public consultation is available on the [SWLP website](#).

1.15 As part of the work on the SWLP, an extensive amount of technical evidence has been gathered. A full list of all evidence, together with links to all evidence base documents, can be found on the [Technical evidence page](#) of the SWLP website. All of this evidence has been used to inform the Publication (Regulation 19) version of the SWLP which is before Councillors today. Some of this evidence has been available for some time, but officers would particularly draw members' attention to the following evidence which has been published more recently, including the following:-

- Sustainability Appraisal report into the Publication (regulation 19) document. (Please note that the non-technical summary has been published as **appendix 3** to this report. Appendices 2 and 3 to the Sustainability Appraisal report include more details of the assessment, and these can be found on the evidence page of the SWLP website.)
- Habitats Regulation Assessment
- Employment Land Study update
- Infrastructure Delivery Plan Part 2
- Transport evidence
- Masterplanning report
- Landscape assessments
- Carbon emissions modelling
- Strategic Flood Risk Assessment

- Water Cycle Study
- Updates to the Housing and Employment Land Availability Assessment

1.16 The work on the SWLP has been led by officers with a significant input from Councillors from both Councils. In particular this has involved the following:-

- SWLP Advisory Group: This member group, which includes ward Councillors from both districts, has met regularly since early 2021 to provide a forum for emerging evidence to be reviewed and for policies and allocations to be discussed. It has no decision-making powers and does not form part of the formal overview & scrutiny process of either Council. Nevertheless, it has provided a valuable sounding board and a broad political steer for officers and Councillors as the Plan is prepared. The Advisory Group has met over 60 times since early 2021.
- SWLP Programme Board: Following the report to the Joint Cabinet Committee in December 2025, where concerns were raised about the risks if the SWLP is not submitted by December 2026, the Councils engaged some dedicated external project support and set up a Project Board to provide oversight of this work and help ensure that deadlines are met. This group has met on several occasions since March 2026 and will continue to meet at least until submission of the SWLP.

### **The Publication (Regulation 19) South Warwickshire Local Plan**

1.17 It is important to note that when a local planning authority (LPA) publishes a Local Plan for consultation at Regulation 19 stage, this should be the plan that the LPA intends to submit to the Planning Inspectorate for examination. Government guidance on local plan procedures states that:-

*"Therefore, the LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. ... In particular, they should ensure that it takes full account of all relevant policies in the NPPF and relevant guidance in the PPG. The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability."* (Procedure Guide for Local Plan Examinations: para. 1.1)

1.18 This guidance goes on to say that: *"This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not defer them to future updates or rely on the Inspector to deal with them, or to 'fix' deficient plans at examination."* It is important, therefore, that in approving the Publication (Regulation 19) SWLP, members recognise the scale of the development challenges facing South Warwickshire and understand both why and how the SWLP has sought to address these in a robust and deliverable way.

1.19 Members are asked to also be mindful of the fact that this is a 25-year plan. The rationale for this is to provide certainty to communities as to the locations for future development but also to assist with the provision of infrastructure, which often has longer timeframes than the typical 15-year Local Plan time horizon. The obvious consequence of this approach is that the total housing and employment needs figures appear much larger. In reality, it is the same annual rate of growth just over a longer timeframe for the reasons set out above. It

includes some major and long-term allocations of land for development, some of which will take the whole lifetime of the Plan (and in some cases beyond the Plan's end date) to be fully developed. It is therefore impossible to be able to answer all questions about the detailed delivery of all sites, and members are asked to recognise that some flexibility over the delivery of sites will be needed as sites eventually come forward. However, that does not mean that Councillors should not consider the deliverability of sites and the viability and appropriateness of infrastructure that is needed to support these. Councils should properly consider such issues at this stage, and key parts of the SWLP evidence base address these issues head on: in particular in relation to transport evidence. Delivering necessary and timely infrastructure is a key component of the SWLP, and the SWLP Infrastructure Delivery Plan sets out the key elements of this infrastructure.

1.20 Having regard to this, the Publication (Regulation 19) SWLP (attached as **appendix 1**) has been broadly structured around the following headings:-

- Development Strategy: South Warwickshire 2050
- Delivering the Necessary Infrastructure
- Growing the South Warwickshire Economy
- Building the Homes that Meet the Needs of Our Communities
- Achieving a Climate Resilient and Net Zero Carbon South Warwickshire
- Enhancing the Built and Natural Environment of South Warwickshire

### **Key headline messages from the SWLP**

1.21 The key "headline" messages from the SWLP can be summarised as follows.

1.22 Firstly, the SWLP is required to deliver a **significant amount of new development** over the period 2025-2050; 54,925 homes to meet local housing needs and up to 366 hectares of employment land to meet local strategic and non-strategic employment needs. In addition, the needs of particular groups such as Self and Custom-builders and Gypsies and Travellers are also met through the SWLP. The level of housing growth has been set for all local authorities by Government and are minimum figures.

1.23 In addition, there may be a requirement to meet unmet needs from other areas. The position in respect of accommodating shortfalls arising from outside South Warwickshire is set out in Appendix 7. Whilst the formal Duty to Co-operate has been rescinded, there remains an obligation for local planning authorities to engage positively in regard to any strategic cross-boundary planning matters. Officers consider that this obligation has been satisfied. In respect of Coventry and Warwickshire there are acknowledged outstanding employment needs arising from Coventry City. These are still to be confirmed and are currently being tested through the Coventry Local Plan examination. However, the selection of employment sites within the SWLP naturally provides for some overprovision of employment land. It is not unreasonable to assume that some of this overprovision can contribute to meeting the shortfalls arising from Coventry. In respect of Birmingham, Solihull and the Black Country, there is a lack of clarity regarding the scale of any shortfalls as well as the extent to which any such shortfalls can reasonably be met within the West Midlands planning area. Indeed, the West Midlands is currently preparing a Spatial Development Strategy (as required under the new planning system); it will be for this plan in the first instance, to explore provision within its area and

confirm if any shortfall exists, acknowledging the limited functional relationship between the Black Country and South Warwickshire, in particular.

- 1.24 Secondly, the SWLP is informed by a **vision and a Spatial Growth Strategy**. The Spatial Growth Strategy has been developed around some key principles including: (a) first utilising available urban brownfield land, (b) where greenfield development is needed, concentrating this into fewer, larger areas of strategic growth, (c) using locations which are within reach of existing facilities, or providing new facilities on site, (d) considering the potential for one or more new settlements, (e) allowing for small-scale growth outside of strategic areas and (f) building at densities that make efficient use of land.
- 1.25 Thirdly, in accordance with this strategy, and set out in Policy DS.2 of the SWLP, **strategic development** has been focused on several locations as set out in table 1 (housing) and table 2 (employment).

**Table 1: Strategic housing growth locations**

Settlement	Proposal ref	Site	No. of homes to 2050	No. of homes post 2050
<b>Stratford-on-Avon District</b>				
Bidford	BID.1	Bidford	2,551	
Henley	HEN	Northwest of Henley	1,969	
Southam	SOU.1	West of Southam	3,086	
Stratford North	STR.1	Stratford North	768	
Stratford West	STR.2	Stratford West	687	
Stratford South	STR.3	Stratford South	2,827	
Wellesbourne	WEL.1	North of Wellesbourne	1,331	
New Settlement	LMA	Long Marston Airfield	4,500	5,700
<b>Warwick District</b>				
Coventry	COV.1	South of Coventry	3,940	262
Kenilworth	KEN.1	South of Kenilworth	751	
Leamington	LEA.1 and LEA.2	North of Leamington	1,784	
Leamington	LEA.3	Leamington Spa East - East of Lillington	916	
Warwick	WAR.1	West of Warwick	493	
Bishop's Tachbrook (northwest)	BIS.1	Land to north-west of Bishop's Tachbrook	558	

Settlement	Proposal ref	Site	No. of homes to 2050	No. of homes post 2050
Bishop's Tachbrook (south)	BIS.3	Land to east of Europa Way	1,550	
New Settlement	HAT	Land at Hatton	4,000	1,250
<b>Total</b>			<b>32,872</b>	<b>7,212</b>

- 1.26 Unlike the current Local Plans, the SWLP does not follow a dispersed development strategy with development only expected in a limited number of locations. This is because the strategy that has been pursued through the SWLP is to focus growth in a limited number of strategic locations that secure the necessary infrastructure and are also accessible to regular (in a South Warwickshire context) public transport services. Focusing development in such locations also offers the greatest opportunity to improve existing transport service levels, thus benefitting existing residents.
- 1.27 It is the view of officers that the SWLP represents a sustainable solution to the development challenges facing South Warwickshire. Recognising the unsustainability of such locations, it seeks to limit development across smaller rural communities. This is particularly important in the current context of neither District being able to demonstrate a 5-year supply of housing where all locations are at potential risk of speculative applications.
- 1.28 In addition to these strategic housing locations, the remainder of the housing requirement is being met on "local growth" housing sites. A full list of all sites is contained in Policy DS.7 of the SWLP (attached at Appendix 1). For information, Appendix 2 of the SWLP itself (i.e. Appendix 1 of this report) includes all the various allocations listed by settlement.

**Table 2: Strategic and Local Growth employment growth locations**

Settlement	Site	Capacity (hectares)	Strategic/ local growth
<b>Stratford-on-Avon</b>			
Gaydon/Lighthorne Heath (GAY.1)	Gaydon/ Lighthorne Heath		Strategic
Bidford		11	Local Growth
Henley-in-Arden	Henley Golf Club	3.3	Local Growth
Long Marston New Settlement		15	Local Growth
Southam	South of Leamington Road	5	Local Growth
Southam	Land at Welsh Road & Daventry Road	2.8	Local Growth
Atherstone	Airfield	28	Local Growth
Studley	Jill Lane	6.5	Local Growth

Settlement	Site	Capacity (hectares)	Strategic/ local growth
Wellesbourne	Wellesbourne Campus	27	Local Growth
Wellesbourne	Airfield	65	Local Growth
<b>Warwick District</b>			
Leamington/Warwick (BIS.3)	Red House Farm	121	Strategic
South of Coventry (COV.2)	Coventry airport		Strategic
Stoneleigh (STO)	Stoneleigh Park	81	Local Growth
Warwick	Stratford Road	4	Local Growth
Warwick	Longbridge island	16	Local Growth
Kenilworth	Princes Drive	0.6	Local Growth

- 1.29 Fourthly, this development will be supported by a **significant amount of new infrastructure**. Recognising the importance of infrastructure, Chapter 3 of the SWLP (attached at Appendix 1) includes policies to safeguard existing, and to support the delivery of new infrastructure. The SWLP is accompanied by an Infrastructure Delivery Plan which can be viewed on the website as one of the evidence-base documents that sets out what infrastructure needs to be provided and how it will be delivered.
- 1.30 Notwithstanding this, it is important to note that a local plan is a land use plan, not a transport or other infrastructure plan. One of its roles is to identify the infrastructure needed to support the new development that is planned within it. The delivery of necessary supporting infrastructure is the responsibility of various other bodies, each of which has their own statutory responsibilities. As such, whilst the role of the local plan is to co-ordinate infrastructure provision, it cannot necessarily remedy pre-existing deficiencies in infrastructure. These issues exist regardless of whether a Local Plan is in place. The SWLP can seek to ensure that new development does not add to any burden on infrastructure, which in turn, can have a positive impact on resolving existing capacity issues. Infrastructure provision is dependent upon the decisions of, and funding available to, infrastructure providers which are not usually the district Councils (e.g. Severn Trent, Western Power, the NHS, or Warwickshire County Council as the local highway and education authority). This includes funding that can be collected through developers' contributions (s106 and the Community Infrastructure Levy).
- 1.31 The two Councils have worked closely with infrastructure providers to ensure that the infrastructure needs of a growing South Warwickshire are understood and can be addressed through policies and allocations in the SWLP. This work has included:-
- A Strategic Transport Assessment prepared jointly with Warwickshire County Council
  - A Water Cycle Study prepared in consultation with Severn Trent Water and the Environment Agency in relation to fresh water and sewerage infrastructure;
  - Education discussions with Warwickshire County Council;

- A Health Impact Assessment and discussions with the Coventry and Warwickshire Integrated Care Board in relation to primary health care infrastructure; and
- The preparation of a Playing Pitch Strategy (forming part of the evidence base) in relation to public open space provision.

1.32 Examples of the types of infrastructure being provided through the SWLP include:-

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| <ul style="list-style-type: none"> <li>• Mixed use/neighbourhood centre</li> <li>• Community centres</li> <li>• Public open spaces</li> <li>• Sports &amp; leisure facilities</li> <li>• Primary and secondary schools</li> <li>• Health facilities</li> <li>• Allotments</li> <li>• Active travel – e.g. enhancements to existing</li> </ul> | <ul style="list-style-type: none"> <li>network or creation of new network</li> <li>• Upgrades to the existing highway network</li> <li>• New bridges</li> <li>• Green and blue infrastructure</li> <li>• Transport hubs</li> <li>• Park and ride</li> <li>• Enhancements to rail infrastructure</li> </ul> |
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1.33 Members' attention is particularly drawn to a number of the larger infrastructure improvements that the SWLP will enable. These will be of benefit to new residents and communities as these are formed, but will also have benefits for existing residents. These include the following:-

- Proposal COV.1 (land south of Coventry): Safeguarding of land to provide a new 'University of Warwick/Coventry South' railway station as part of a wider multimodal transport interchange including park and ride. This development would also enable an opportunity for delivery of VLR (very light rail) linking the University with the city centre.
- Potential for new country park at Proposal COV.1 (land south of Coventry) and a 40-hectare expansion of the existing country park (currently being delivered) at Proposal BIS.1 (Bishops Tachbrook).
- Active travel improvements in all of the strategic growth locations and both new settlements.
- A new motorway junction between junctions 13 and 14 enabling the closure of these two junctions as part of BIS.3 (South of Europa Way and north of the M40).
- New access to Stoneleigh Park from A46 Stoneleigh junction which will act as a bypass for Stoneleigh village.
- New Park & Ride facilities as part of Proposal BIS.1 (West of Europa Way) and to the north of Leamington.
- Potential to enhance Hatton Station as part of the Hatton new community.
- A new Stratford-upon-Avon Bypass to the west of Stratford-upon-Avon to deliver growth south of the town including Marston Airfield New Community
- A new Country Park with improved footpaths at Beaudesert Mount in Henley-in-Arden.

- Within Stratford-upon-Avon, a new mixed use pedestrian gateway into the Welcombe Hills Country Park including a new visitor centre, café and parking.
  - New or expanded Secondary School provision across South Warwickshire including at the Long Marston Airfield new community, Hatton new community and in Bidford, Bishop's Tachbrook, Southam and Stratford-upon-Avon. A number of new primary schools will also be provided across the area.
- 1.34 It is the intention that sitting alongside the SWLP will be a Community Infrastructure Levy (CIL) charging regime for both Councils. Work on this will now proceed in earnest so that the charging regime can be examined and enacted alongside the SWLP.
- 1.35 Fifthly, the SWLP has, as one of its strategic objectives, a **climate resilient and net zero carbon** South Warwickshire. This work has been informed throughout by the climate emergencies declared by both Councils prior to starting work on the SWLP, and the work undertaken by WDC to prepare and adopt planning policies to deliver Net Zero Carbon development. A range of policies are included in the SWLP including on matters such as:-
- Large-Scale Renewable Energy Generation and Storage
  - Decentralised Energy Systems
  - Net Zero Carbon Buildings
  - Reducing Energy Consumption in Existing Buildings
  - Embodied Carbon
  - Water Efficiency and Climate Resilient Design
- 1.36 Sixthly, members' attention is also drawn to the **detailed and supplementary policies** that have been included in the SWLP. It had previously been the intention of both Councils that the SWLP would be a "part 1" local plan, dealing only (in the main) with strategic matters such as the vision and spatial growth strategy, the amount and distribution of new development, and the broad locations of this. It was originally intended that the "part 1" plan would be followed by other plan(s) which could include more detailed and non-strategic policy. The introduction by government of the new planning procedures following the Levelling Up & Regeneration Act have meant that it is no longer possible to do this. As well as setting a 30-month timescale on the preparation of Local Plans, Government is introducing national Development Management policies and re-introducing strategic scale planning at the sub-regional/regional level.
- 1.37 Accordingly, the SWLP now contains a wider suite of planning policies on non-strategic matters. These include some site-specific policies including on matters currently contained within SDC's Core Strategy and WDC's Local Plan.
- 1.38 Further changes introduced by government include the introduction of Supplementary Plans and Design Codes. Under current regulations, supplementary planning guidance can be prepared that sits alongside Local Plan policies, but which do not form part of the statutory Development Plan itself. These Supplementary Planning Documents (SPD) can be site specific (e.g. masterplans) or thematic and area-wide e.g. design, affordable housing, parking. Whilst SPDs are subject to consultation, they do not need to be examined. Both SDC and WDC have a suite of existing site and thematic SPDs that sit alongside their respective local plans.

- 1.39 The proposed Supplementary Plans differ from SPDs in several respects, including that they can only relate to site specific issues. For this reason, some existing thematic planning guidance has been reviewed and included in the SWLP to ensure that it has planning status once the SWLP is adopted and the current SDC Core Strategy and WDC Local Plan cease to have effect. This covers matters such as detailed guidance on affordable housing, developer contributions, open space and self and custom-build housing. The Council's will also be able to prepare technical guidance to assist with the implementation of the SWLP but this will not have the same status as supplementary guidance or plans. In addition to the SWLP, the Council's will be preparing a South Warwickshire Design Code (as required by Government).
- 1.40 Many town and parish councils have prepared neighbourhood development plans that, along with the local plan, form part of the statutory Development Plan for their area. Whilst the SWLP will supersede both the current Stratford-on-Avon Core Strategy and Warwick Local Plan on adoption, current neighbourhood plans will remain in force. However, given the change in the planning framework at the district level, many of these neighbourhood plans will require reviewing, at least in part, in particular in respect of the categorisation of the settlement, the scale of growth and any specific SWLP allocations and designations. In doing so, there is a requirement for neighbourhood plans to be in conformity with the Local Plan. It is likely that most of the detailed policies within existing neighbourhood plans, such as design, will not need amending and the plan can be reviewed and readopted in accordance with the relevant regulations relatively easily. Both Councils have committed to continued support for neighbourhood planning groups.
- 1.41 Importantly, as noted above, the SWLP is not expecting or requiring development to come forward in the majority of smaller settlements across South Warwickshire. The SWLP does set out limited parameters in which development in such rural locations will be supported to help maintain the vitality of smaller rural communities and to ensure that local needs can continue to be met.
- 1.42 Finally, the SWLP needs to be **viable and deliverable**. A whole plan viability assessment of the SWLP is being undertaken for the Councils by specialist consultants. As part of this work, the consultants have identified four different "housing value zones" across South Warwickshire. Within these, they have reviewed the proposed new settlements, some of the proposed strategic sites and a range of site typologies. Sensitivity analyses have been undertaken on these viability assessments.
- 1.43 The initial viability assessments have demonstrated some viability challenges on certain sites within the plan area. Further sensitivity testing is therefore being undertaken, looking at issues such as the level and mix of affordable housing and levels of Biodiversity Net Gain. These will be presented to the Committee as an addendum to this report.

### **Next steps**

- 1.44 Subject to the Publication (Regulation 19) version of the SWLP being recommended for approval by the Joint Cabinet Committee and then subsequently approved by the two Councils, the formal Publication (Regulation 19) public consultation can be undertaken. A consultation strategy is being prepared to set out the Council's approach. The expectation is that explanatory videos will be prepared along with online briefings that members of the public

can attend. Officers will also host 'drop-in sessions/road show exhibitions so that residents can find out more and ask any questions.

- 1.45 The public consultation is required by the Regulations to run for six weeks and to be compliant with the adopted Statement of Community Involvement of each Council. The consultation is planned to run from Friday 12<sup>th</sup> June to Monday 27<sup>th</sup> July 2026. As noted in paragraph 1.17 above, a Local Plan published for public consultation at Publication (Regulation 19) stage, should be the plan that the LPA intends to submit to the Planning Inspectorate for examination. This consultation is therefore different to previous public consultations undertaken under Regulation 18 (for example the Preferred Options consultation undertaken in 2025). To assist this consultation, the Planning Inspectorate has published a model representation form for local plans at the publication stage. This form invites comments on whether the plan is legally compliant, sound and compliant with the duty to cooperate.
- 1.46 For these reasons, it is fully recognised that this consultation is going to be more challenging one to explain to local residents and interested parties, than has been the case with previous consultations. Indeed, although the word "consultation" is that used in government planning guidance, a better description may be "period for representations". If the Councils formally agree, after the Regulation 19 consultation, that the SWLP is to be submitted to the Secretary of State, then any representations made are also for the benefit of the Examination Inspector(s). For the consultation to be effective, councillors and officers will need to work together to ensure that people are aware of their opportunity to comment and - equally importantly - help them to do so in an appropriate way.
- 1.47 As noted above, the consultation will need to take place in accordance with the Statements of Community Involvement (SCI) approved by both Councils. This will include the following:-
- Make documents available on the website and through the online consultation portal.
  - Make documents available at the approved Deposit points. (This will include council offices, local libraries and other locations named in SCOs.)
  - Consult with general and specific consultation bodies.
  - Consult those on the Councils' respective mailing lists. (The Council has maintained a list of people who have asked to be kept informed of the progress of the SWLP. The Councils will also contact anyone who has previously made a representation on the SWLP unless they have asked to be removed from any mailing list.)
  - Consult Duty to Co-operate bodies.
  - Inform other appropriate bodies.
- 1.48 In addition, following what has been done on previous SWLP consultations, officers are exploring opportunities to reach out in other ways to local communities including through online briefings (including specifically for parish and town councils) and face-to-face drop-in events.
- 1.49 The consultation will be fully supported by the media/comms teams from both councils and involve a promotional campaign on social media. These teams will also support measures to present the SWLP document and consultation forms as clearly and engagingly as possible to assist people to make representations.
- 1.50 More details of the public consultation arrangements will be available shortly.

- 1.51 It is important to note that after the Regulation 19 consultation the Council will have limited opportunity to make further changes to the local plan. It must submit the version consulted on. Planning Inspectorate guidance states that if the Council wishes to make changes to the version consulted upon it should prepare an addendum including (if the changes are significant) sustainability appraisal and habitat regulations assessment of the changes and then re-consult with the public for six weeks on that addendum. Given the requirement to submit the SWLP by 31 December 2026 in order for it to be allowed to proceed (as set out in para. 1.12 above), there would effectively be no opportunity to the two Councils to do this. It may be possible to make very minor changes to the SWLP at this stage, and if the Councils wish to do this, legal advice of the soundness of any approach will be taken.
- 1.52 Following the close of the public consultation in July, the Councils are required to update the consultation statement to include details of the number of representations received and a summary of the main issues raised in those representations. There will also be a requirement for the SWLP be brought back before the two Councils to seek approval to submit the SWLP to the Secretary of State. The Plan could only be submitted if both Councils approve its submission. In accordance with the current published timetable, this would take place in December 2026 to enable submission by the government's deadline.

## **2 Alternative Options available to the Joint Committee**

- 2.1 The Councils could stop work on the SWLP and look to pivot preparing the SWLP, or independent Local Plans, through the new plan making arrangements which have now come into force. However, negatives to this approach are that it is envisaged that the plan will be expected to start at stage 1 of the new process. As a result, it is anticipated that whilst much evidence would have been prepared, there would be an estimated delay of 2 to 3 years, based on informal discussions with the Planning Advisory Service (PAS) whilst the plan moves through the new process. This would heighten concerns in respect of time expiry of the current adopted plans at a time when neither of the Local Authorities are able to demonstrate delivery of a 5-year housing land supply. In addition, the new system will not be tried and tested and therefore there is potential for further delays to ensue as Local Authorities and the Planning Inspectorate navigate the new system. Finally, the delays could result in significant monies being wasted on the plan to date and it is considered that costs could increase by pivoting to the new system as delays may require the evidence to be updated. For these reasons, this option is not recommended.
- 2.2 The Joint Committee could recommend the Publication (Regulation 19) SWLP to both Councils but with changes (major or minor) be made to it. Any officer recommendation on whether these changes could impact the soundness of the SWLP will depend on the nature and scale of these changes, and officers would advise accordingly. Recommendation 5 to this report delegates authority to the Head of South Warwickshire Local Plan (Stratford-on-Avon District) and Head of Place, Arts & Economy (Warwick District), in consultation with the two Leaders and Portfolio Holders, to make minor amendments, corrections and edits as necessary to the Publication draft documents prior to the commencement of the public consultation. It is advised, however, that major changes at this stage are likely to raise issues of soundness, and may well not be supported by evidence. Any such changes would also need the support of both Councils.

### **3 Consultation and Member's comments**

- 3.1 Throughout the preparation of the SWLP, the leaders and portfolio holders with responsibility for the SWLP have been fully involved in the Plan's preparation. Currently the portfolio holders are Councillor Cowcher for Stratford-on-Avon District Council and Councillor King for Warwick District Council. As noted above, the SWLP Member Advisory Group which includes Councillors from both district meets regularly and has fully considered all key matters and reviewed all key evidence relating to the SWLP. In addition, workshops and briefings have been held during the Autumn/winter period of 2025 and the Spring of 2026 to provide updates and engagement opportunities for all district Councillors.

### **4 Implications of the proposal**

#### **4.1 Legal/Human Rights Implications**

- 4.1.1 The SWLP is a Development Plan document and therefore, when adopted, will form part of the statutory Development Plan for both districts. As such, its preparation must comply with a number of statutory requirements including public consultation; regard to national policy and the achievement of sustainable development. As a Development Plan document, it will be subject to independent scrutiny through an examination in public to ensure that it is 'sound' (fit for purpose) and satisfies all necessary legal requirements. This includes ensuring that residents and stakeholders can engage meaningfully in the process.

#### **4.2 Financial**

- 4.2.1 The estimated cost of producing and getting the SWLP in place is £2.2m, excluding staff costs. This cost is to be shared equally between Stratford-on-Avon District Council (SDC) and Warwick District Council (WDC). SDC has committed a total of £1.6m to date to fund its share. WDC currently has set aside £1m. In addition to this, in 2025 the Councils were successful in securing government contributions of £454k (£227k to each authority) to support Local Plan preparation and a further £140k (£70k to each authority) specifically to enable further work to be undertaken to support Green Belt assessments, particularly in the light of the changes made to the NPPF in December 2024. In Spring 2026, each Council received an additional £36,585 to support the Local Plan work.

#### **4.3 Council Plan/Corporate Strategy**

- 4.3.1 As a Development Plan document, the SWLP will help SDC meet its six thematic aims. These include striving to deliver affordable well built and maintained homes; creating a larger, stronger, greener and more inclusive economy; leading the fight against climate change; and ensuring that health and wellbeing is at the heart of decisions made.
- 4.3.2 In respect of WDC's Corporate Strategy, preparation of the SWLP will help the Council achieve its stated objectives of: -
- prioritising housing development on brownfield sites.
  - minimising use of greenfield sites where possible.
  - promoting new developments using 20-minute neighbourhood/settlement designs.
  - ensuring convenient access to services and shop.

- protecting existing community identities.
- ensuring the provision of appropriate infrastructure is available to support new and existing development.

4.3.3 Through the Local Plan, positive consideration will be given to the extent to which increasing housing densities in new developments could contribute to delivering the above.

#### 4.4 **Environmental/Climate Change Implications**

4.4.1 Tackling climate change and responding to the Climate Emergencies that both Councils have declared is at the heart of the SWLP. In order to maximise opportunities for climate change adaptation and mitigation, and to meet net carbon zero targets, it is critical that the evolving Plan is informed by assessments on its impact on climate change. As such, consultants have been appointed to prepare these assessments and ensure that all aspects of climate change are considered as part of the SWLP.

#### 4.5 **Analysis of the effects on Equality**

4.5.1 An Equalities Impact Assessment is required to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations. An Equalities Impact Assessment to support the Publication (Regulation 19) Plan is included as **appendix 6** to this report.

#### 4.6 **Data Protection**

4.6.1 Both Councils will ensure that all data protection requirements are adhered to. This will particularly be the case in respect of personal or commercially sensitive information that is provided to the Councils through public consultations. The Councils have prepared a joint Privacy Statement on the SWLP website. Where AI has been used, this has been done in accordance with the policies and procedures in place within the Councils.

#### 4.7 **Health and Wellbeing**

4.7.1 A Health Impact Assessment is required for the Local Plan to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations. A Health Impact Assessment has been prepared to support the Regulation 19 Plan and is included within the evidence base.

### **5 Risk Assessment**

5.1 There are many risks associated with undertaking a Local Plan review. These are financial, reputational and legal. All Local Authorities are required to prepare Local Plans and both Councils are experienced in managing these risks. All stages of the Local Plan are subject to Councillor advice, scrutiny and approval and so there is opportunity for Councillors to have proper oversight of the technical work and procedures that are being undertaken.

5.2 There are additional risks in undertaking a joint Local Plan review with another local authority as is being undertaken here. These are largely political and relate to the willingness of both Councils to continue to work together to approve the document.

5.3 It needs to be recognised that there are additional risks related at this stage of the local plan process. Decisions to undertake previous consultations on the SWLP have been made by the Joint Cabinet Committee under powers delegated to it. On this occasion, the decision to proceed to the Publication (Regulation 19) consultation is being made by the two Councils separately. If either Council

does not support the SWLP in its current form, then the Regulation 19 consultation cannot take place until that agreement is secured. This would place additional pressures on an already very tight timetable and make the likelihood of being able to submit the SWLP much more challenging. Similarly, immediately prior to submitting the SWLP to the Secretary of State, the formal approval by both Councils is also required.

- 5.4 Ultimately, as local planning authorities, both Councils are obliged to prepare and keep up to date a Development Plan for their area. The SDC Core Strategy was adopted in 2016 and the WDC Local Plan in 2017. Both plans are now more than five years old, and in accordance with government advice it is prudent to start planning for the period post 2031/2029 when those plans expire. Neither District can currently demonstrate a 5-year housing land supply, and as such, neither Local Plan is up-to-date in this respect.
- 5.5 It is also recognised that there are risks associated with preparing a Local Plan due to the timing of elections in the future. Whilst it is anticipated decisions would be made by the current administrations of both Councils and by the current Joint Cabinet Committee based on the current timetable, as the May 2027 elections are not anticipated to proceed due to Local Government Reorganisation proposals set out by the government, there is the potential for unanticipated by-elections to impact. Furthermore, it should be noted that the indicated date for adoption of the SWLP (March 2028) is only just before the proposed date for when a new Council comes into being to cover South Warwickshire under the government's Local Government Review timetable. Therefore, if there is any slippage in the plan preparation timetable which is not within the control of the authorities once the plan is submitted, the final decision to adopt the SWLP would be made by whatever new Council is then in place under the Local Government Review proposals.
- 5.6 There are also significant risks of not preparing a Local Plan. Having an up-to-date plan in place keeps the Councils in control of planning decisions and enables us to ensure we get the right homes in the right places supported by the right infrastructure. Not having a plan will not reduce the demand for new homes in South Warwickshire but would result in unsustainable homes delivered by planning by appeal which can result in expensive costs if appeals are lost. It is highly likely that even more homes would get built in this situation than under the SWLP because the two Councils will have abdicated their plan-making responsibilities.
- 5.7 Officers acknowledge the scale of development that the SWLP seeks to plan for. The current standard method figures are almost double the previous standard method figures and approximately a third higher than the current local plan requirements. Notwithstanding this, it is worth noting that under the previous planning system, there would have been a greater need to accommodate shortfalls from outside of South Warwickshire. So in reality, the scale of growth within South Warwickshire may have been similar. It should also be noted that Stratford District has achieved delivery in excess of the current standard method figures in recent years, suggesting that such levels are achievable from a housing market perspective. Warwick District, however, has only been able to do this on two years since the current local plan was adopted in 2017. Delivery of these housing requirements remains a significant challenge for both authorities.

## **6 Conclusion/Reasons for the Recommendation**

- 6.1 The report presents the Publication (Regulation 19) SWLP to the Joint Cabinet

Committee. The Joint Cabinet committee is asked to recommend to both Councils that the Publication version of the SWLP is approved for consultation under Regulation 19 with a view to submitting the SWLP to the Secretary of State.

- 6.2 The report outlines the importance of having an up-to-date local plan for South Warwickshire. This is (1) to allow the Councils to manage where development occurs and prevent unplanned development, (2) to provide the best opportunity to deliver the infrastructure that communities need in a timely manner, (3) to maximise the ability to deliver community facilities and benefits including through s106 agreements and CIL and (4) to allow the Councils to deliver on their ambitions, and locally specific policies, for example in response to the climate change emergency. This is particularly relevant as neither SDC nor WDC have a 5-year supply of housing land.
- 6.3 The report outlines the regulatory framework within which the SWLP has been prepared. It particularly notes that given the introduction by government of new plan-making procedures, the SWLP will be required to be submitted to the Secretary of State for Public Examination no later than 31<sup>st</sup> December 2026.
- 6.4 The report outlines the key steps that have been taken to prepare the SWLP, noting both the three previous public consultations and the extensive technical evidence base that has been prepared.
- 6.5 The report summarises the key elements of the SWLP. It outlines the amount of housing and employment land required to be delivered in South Warwickshire, the key principles in the Spatial Growth Strategy and the main development allocations which meet needs in accordance with this strategy. It furthermore gives an overview of the key infrastructure which will be delivered alongside this growth to mitigate the impact of these developments and meet the needs of our growing population.
- 6.6 Finally, the report outlines the next steps which the Councils will need to follow in order to achieve the government's timetable for submitting the SWLP by the end of 2026.

### **Background papers:**

[Joint Cabinet Committee Scoping report 14 April 2021](#)

[Joint Cabinet Committee Issues & Options report 7 December 2022](#)

[Joint Cabinet Committee Preferred Options report Thursday 12 December 2024](#)

[Joint Cabinet Committee Revised timetable 18 December 2025](#)

### **Supporting documents:**

Appendix 1: Publication draft South Warwickshire Local Plan

Appendix 2: Publication draft policies map (available as a [web link](#))

Appendix 3: Sustainability Appraisal report

Appendix 4: Habitats Regulation Assessment

Appendix 5: Consultation Statement

Appendix 6: Equalities Impact Assessment

Appendix 7: Effective Cooperation Compliance Statement

### Report Information Sheet

Please complete and submit to Democratic Services with report

<b>Committee / Date</b>	Joint Cabinet / 28 May 2026	
<b>Title of report</b>	South Warwickshire Local Plan – Regulation 19	
<b>Officer / Councillor Approval *required</b>	<b>Date</b>	<b>Name</b>
<b>Ward Members(s)</b>		Consultation with Member Advisory Group
<b>Portfolio Holder</b>		Cllr G Cowcher (SDC) and Cllr C King (WDC)
<b>Financial Services *</b>		Richard Burrell (SDC) Andrew Rollins (WDC)
<b>Legal Services (*SDC)</b>		Sue Mullins (SDC and WDC) Joint Legal Services Manager
<b>Other Services</b>		
<b>Chief Executive(s)</b>		David Buckland (SDC) Chris Elliott (WDC)
<b>Head of Services(s)*</b>		Phil Clarke (WDC) John Careford (SDC)
<b>Section 151 Officer</b>		Richard Burrell (SDC) Andrew Rollins (WDC)
<b>Monitoring Officer</b>		Marcia Eccleston (SDC) Graham Leach (WDC)
<b>CMT (WDC)</b>		
<b>Leadership Co-ordination Group (WDC)</b>		
<b>Other organisations</b>		
<b>Final decision by this Committee or rec to another Cttee / Council?</b>	No – recommendation to Full Councils (SDC and WDC)	
<b>Contrary to Policy / Budget framework?</b>	No	
<b>Does this report contain exempt info/Confidential? If so, which paragraph(s)?</b>	No	
<b>Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?</b>	Yes, Forward Plan item 1, 30/04/2026 Version	
<b>Accessibility Checked?</b>	Yes	