



Planning Inspectorate

Stratford-on-Avon District Council and Warwick District Council

South Warwickshire Local Plan

Note of advisory meeting held on 19 May 2026 at Stratford-on-Avon Council Offices

Attendance

Jonathan Bore	Inspector, the Planning Inspectorate
Jo Bozdoganli	Planning Policy Manager, Stratford-on-Avon District Council
Amit Bratch	Principal Planning Officer, Warwick District Council
John Careford	Chief Planner, Stratford-on-Avon District Council and Head of South Warwickshire Local Plan
Andrew Cornfoot	Planning Policy and Major Sites Delivery Manager, Warwick District Council
Sean Nicholson	Planning Policy Manager, Stratford-on-Avon District Council

Text highlighted in bold below constitutes my advice on the issues discussed.

Current position and next stages

1. The South Warwickshire Local Plan will be a joint local plan covering the districts of Stratford-on-Avon and Warwick.
2. The draft plan has almost reached Regulation 19 stage. It has already been published for committee purposes. It will soon be published for consultation under Regulation 19. The 6 week consultation period is likely to begin on 12 June, but there is a possibility that it might be moved back until after the summer holidays.
3. It is intended that the plan will be submitted for examination by 31 December 2026. It is hoped that examination can be completed by end of 2027 with formal adoption by 31st March 2028.

Housing need

4. Despite the emerging South Warwickshire Local Plan being a joint plan, the housing and employment needs of the two authorities will be treated separately in the plan.

5. Under the December 2024 standard method calculation, local housing need (LHN) for Stratford-on-Avon is 1,112 and for Warwick it is 1,085. It is intended that these figures should form the basis for the plan's housing requirement.
6. The councils do not anticipate having to accommodate unmet housing need from other authorities. Coventry is not considered to have unmet housing need.
7. Birmingham and the Black Country are likely to have a substantial amount of unmet housing need, but it has not been quantified or apportioned. A study commissioned by the West Midlands Combined Authority has been extended to include the Coventry and Warwick HMA but it has not reported yet. A boundary has been agreed for the spatial development strategy and work has commenced on assessing housing and economic development needs. **The question of unmet need and the apportionment of that need is therefore be better addressed through a subsequent local plan or regional spatial strategy.**

Housing allocations and supply

8. The councils' figures suggest that the plan's housing allocations together with commitments and windfalls will meet the LHN for each authority.
9. Two new settlements are proposed, at Hatton and Long Marston Airfield, and the plan identifies several new strategic growth locations. A number of smaller sites have also been allocated. To these can be added existing commitments and an allowance for windfalls.
10. The plan does not rely on neighbourhood plans to augment housing supply, so it does not need to set particular housing requirements for individual neighbourhood planning areas. Any housing allocations made through neighbourhood plans will be part of the supply headroom.
11. **A realistic, evidence based approach should be taken towards the anticipated supply of windfalls for the purposes of the supply calculation. It is common to base the figure on an average of windfall delivery over previous years.**
12. The councils anticipate that Warwick will be able to demonstrate a 5 year housing land supply at the anticipated adoption date of the plan of 31 March 2028. However, Stratford will only be able to do this if its housing requirement follows a stepped trajectory. This would rise from 730 dwellings per annum in the first three years of the plan (reflecting actual delivery) to a maximum of 1,494 by 2030/31.
13. **The soundness of the proposed trajectory will be a matter for the examining Inspector. A stepped trajectory should not be used if there are enough deliverable sites in the early part of the plan period, for example through evidence from the SHLAA or from a call for sites. Depending on the position, it may be necessary to identify additional sites for early delivery, or include policies in the plan that will enable additional unallocated sites to be brought forward, for example on the edge or urban areas and/or in sustainable**

locations. If there are insufficient deliverable sites for this period in Stratford, this will need to be demonstrated by adequate evidence.

14. However, if delivery realistically cannot be raised quickly enough in the early years of the plan to meet a higher housing requirement, a stepped trajectory can be a realistic and pragmatic way of avoiding failure against the 5 year housing land requirement. It does of course mean that the housing requirement is higher in the middle of the plan period. It is for the councils to make a case for such an approach, providing adequate evidence to support it.
15. A difficulty might arise from the small amount of housing supply headroom in both authorities. This is the difference between anticipated housing supply and the housing requirement. In Stratford-on-Avon District this difference would amount to 6.8% above the requirement figure, and in Warwick District, only 1.4%. These figures allow for very small margins of comfort, especially as the plan relies on new settlements and strategic sites whose long lead-in times and impediments to delivery are well-documented.
16. Whilst there is no national policy that requires a particular amount of supply headroom, there would be a significant risk in both authorities of undershooting the 5 year housing land supply requirement if one or more of the allocated sites failed to come forward when anticipated, or did not deliver homes at the expected rate. There is a notable jump in the anticipated supply trajectory for both districts between 2028/29 and 2029/30, and whether this step change can realistically be achieved will inevitably be tested at examination.
17. Since one of the purposes of bringing forward the local plan quickly is to remedy the current shortfall in the 5 year supply, the councils are strongly advised to take steps in the plan to raise housing supply further to avoid dropping back into shortfall. A 10% headroom figure is sometimes quoted as a yardstick, but the amount of headroom will depend on the circumstances of both authorities. As discussed above, it may be desirable to allocate additional sites and/or include policies in the plan that will enable such sites to be brought forward quickly.
18. The section on gypsies and travellers does not satisfactorily describe the level of need and how this relates to the plan's proposed provision. The explanatory text needs to be clearer on this point and it should also set out the rationale as to how the difference between the provision on allocated sites and the overall assessed need will be addressed.
19. The expected proportion of affordable housing should be set out for each site. Different rates may be set for different parts of the plan area within reason provided the reason for this is evidenced. The Golden Rules in the NPPF set out what is expected on land released from the Green Belt. If there are viability issues that require less than 50% affordable housing on land released from the Green Belt this needs to be fully evidenced and there needs to be adequate explanation in the plan's text.

Employment land

20. The plan makes substantial provision for employment land: 178ha net. Coventry cannot meet all of its employment land requirements. Rugby Borough will take some of the unmet need. The councils consider that there is headroom within the 178ha to accommodate the remainder of Coventry's unmet employment land need. **This may be an appropriate approach if supported by adequate evidence to demonstrate that the headroom is sufficient and the land is in the right place and is deliverable.**

The spatial strategy

21. **The plan seeks to locate development in sustainable locations, which is a good starting point, but it gives the impression of a static approach that does not recognise fully the major centres of gravity and drivers of growth beyond its boundaries, or the influence of the major transport routes through the area. The policy justification for employment does have more of a dynamic feel, but this is separated from the discussion on the spatial strategy. It is advised that the explanatory text should have much more regard to the context of the plan area and wider influences. This is particularly important when it comes to the issue of Green Belt, discussed below.**
22. **The reference to retail and town centres is rather incongruous within the section on the spatial strategy, I suggest that it is moved back in the plan. In addition, it should refer to town centre uses. A further point is that the policy needs to address the specific circumstances of the new settlements and strategic allocations which will have bespoke amounts of new retail/town centre uses which should be exempted from the sequential approach and retail impact assessment at the application stage.**

Green Belt

23. The plan seeks to release some land from the Green Belt. One of the new settlements would be on land released from the Green Belt. A detailed Green Belt study has been undertaken which looked at the contribution of land parcels to Green Belt purposes and identified areas of grey belt. Further analysis has identified the most sustainable locations for new development and the combined exercise has led to the identification of land to be released from the Green Belt to meet the housing and employment needs of the districts. **Whilst soundness will be a matter for the examining Inspector, the Green Belt study and analysis appear thorough and well-founded.**
24. As a consequence of the analysis, the plan identifies land for release from the Green Belt despite there being potential development sites beyond the Green Belt. The Council say that this is because the sites to be released are in sustainable locations well-related to existing urban areas where the need for homes is greatest. The areas beyond the Green Belt that have not been selected are in less sustainable locations or in areas where the need is lower. **The Council's rationale must be very clearly set out in the explanatory text. Currently the explanation is not sufficient. This must include the strategic-level exceptional circumstances – the overarching need for the development and the contribution to a positive spatial strategy. It must also include the local level exceptional circumstances – the contribution**

of the site to Green Belt purposes, together with landscape, transport and other considerations.

Infrastructure

25. First stage highways modelling has been undertaken and more specific work will be carried out. **The work needs to be complete on or before the date of submission.**
26. Road infrastructure will be required to serve the new settlements. The Long Marston settlement, in which Homes England are involved, is dependent on a relief road which has been costed at £250m. There is an intention to replace J13 and J14 of the M40 with a new junction. A working group has been established between the councils, the County Highway Authority and National Highways and there is a good working relationship.
27. These major infrastructure works will require external funding but there is a question of whether s106 monies will be needed. In addition, a review of CIL may be undertaken concurrently with the plan and the Councils are looking at whether the local plan examination could also include the examination of the CIL review. **Where infrastructure funding is required, the plan will need to be very clear about the respective roles of external funding, s106 and CIL, in general and in respect of individual allocations.**
28. Discussion with the Education Authority on the education needs of the new allocations is ongoing but the actual nature of the provision will probably not be firmed up by the time the plan is submitted, and it may remain fluid thereafter. **It is suggested that where education provision is referred to in the site allocation policies this should not be too prescriptive to allow for flexibility.**

Net zero and building performance

29. The draft plan has a number of very detailed and prescriptive policies devoted to the achievement of net zero.
30. **The 2023 Written Ministerial Statement (WMS) on planning and energy has a strong policy presumption against a proliferation of local standards. It allows for standards beyond the (former) Building Regulations in two instances, but I believe the policies in the plan go well beyond those.**
31. **We now have the new Building Regulations and the Future Homes Standard. These set new standards for building performance. Policy PM13 of the emerging NPPF states that quantitative standards should not cover matters which are already addressed by Building Regulations, other than in respect of accessibility standards and water efficiency, and should not cover matters relating to the construction of buildings. DM7.2 extends the point to DM decisions. The plan's NZ policies clearly run counter to this emerging policy.**
32. **Moreover, Annex A.2 of the emerging NPPF states that development plan policies which are in any way inconsistent with the national DM policies in the Framework should be given very limited weight in decision-making.**

33. It is appreciated that the emerging NPPF is still in draft and things could change. However, the Building Regulations set a clear new baseline which has universal application so if the NZ policies were to remain in the plan they would be likely to receive a very critical assessment at examination.
34. In addition, the plan has issues of viability (see below). The viability work carried out so far has indicated that the cost of implementing the draft plan's NZ policies would be substantially greater per dwelling than the cost of implementing the requirements of the Building Regulations. In a situation where viability is marginal, seeking building performance standards beyond those of the Building Regulations is likely to have an effect on the achievement of other important planning objectives such as adequate levels of affordable housing and good social infrastructure. Although the plan is being examined under the 2024 NPPF, my strong advice to the councils would be to review critically the NZ policies in this light.

Biodiversity Net Gain

35. The statutory requirement is for 10% biodiversity net gain (BNG) and there is no national policy that gives support to a local plan that would seek 20%.

Viability

36. An initial consultant's study has indicated that the plan's allocations are not viable with the proposed levels of BNG and affordable housing and the proposed net zero policies, together with the national space standard and the requirements for accessibility. There is also the question of highways and social infrastructure. **A plan that is shown to be unviable will not be deliverable and will therefore be found unsound.**
37. **It will be necessary to reconsider what the plan is going to say about these requirements. A community's need for homes and for affordable housing is a very important material consideration. Pursuing building performance and BNG standards in excess of national policy or statute, particularly if this is at the expense of affordable housing, or overall housing delivery, will be very critically examined for soundness.**
38. The viability work is not yet complete. It is an iterative process. The consultants have been asked to carry out further work on their modelling so that the councils can consider their options. Changes to the draft plan at this stage and after consultation will need to be assessed. A new version of the viability study is expected to be available by the time of the Regulation 19 consultation. **The final version of the viability study must be completed prior to the submission of the plan for examination as it is a key component for assessing the deliverability of the plan.**

Other matters

39. **The vision and strategic objectives overlap and two lists are confusing; they need to be conjoined.**
40. **The plan leads, not with the spatial strategy or housing need, but with an “environmental compensation” policy. The term “environment” is too vague for this policy to be effective. In any case the idea of off-site compensation for environmental impact is not part of national policy and it is not clear how this mechanism would work. Instead the plan should seek to protect valuable green and blue infrastructure and biodiversity, and to seek mitigation for harmful development impacts. I believe the plan does this anyway.**
41. **The separation of policies into two parts with separate DM considerations reduces the clarity and effectiveness of the policies and makes navigation more difficult.**
42. **Topic papers on housing need and supply, business/industry, Green Belt, viability, the spatial strategy / growth strategy, site selection and the new settlements will be very helpful to the examining Inspector and the councils should consider submitting them at the same time as submitting the plan. There may be other topics that the councils would like to cover.**
43. **Whilst demonstrable need for housing should be met in the plan and is a material consideration in DM, there should not be a requirement to demonstrate the need for specialist housing, such as housing for older people.**
44. **It is not clear why all major development would need a health impact assessment. This would apply to sites of 10 or more homes. There is no evidenced harm that would suggest the need for such assessments.**
45. **Finally, whilst recognising the deadline for the submission of the plan, it is extremely helpful for the examination and the Inspector if the councils are able, before the Regulation 19 consultation, to get all the information and studies completed, review the policies discussed above, and refine the plan so that it is in a logical order with clear explanatory text. This will tend to save time before and during the examination. This point needs to be taken into account when considering the timing of the Regulation 19 consultation.**
46. **I hope that this note has been helpful.**

Jonathan Bore

INSPECTOR

DATE: 21 May 2026