



South Warwickshire Local Plan

Maintaining Effective Co-operation: Statement of Compliance

Publication (Regulation 19) Stage

May 2026

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1. Introduction

The Duty to Co-operate

Introduced by the Localism Act in 2011, the Duty to Co-operate requirement was inserted into planning legislation and placed a duty to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. However, as part of the changes to the plan-making system introduced by the Government through the Levelling Up and Regeneration Act 2023, the legal requirement was abolished in early 2026.

Despite this, the Government has made it clear that Local Planning Authorities progressing Local Plans through the existing (legacy) plan-making system should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and that Inspectors should continue to examine plans in line with the policies in the National Planning Policy Framework (NPPF) on maintaining effective cooperation. [Paragraphs 24-28 of the NPPF \(2024\)](#) set out the national planning policy with regards to maintaining effective co-operation in the plan-making process. This requires joint working to help identify infrastructure requirements and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere, and for this to be taken account of in the resulting Local Plan.

Purpose of this statement

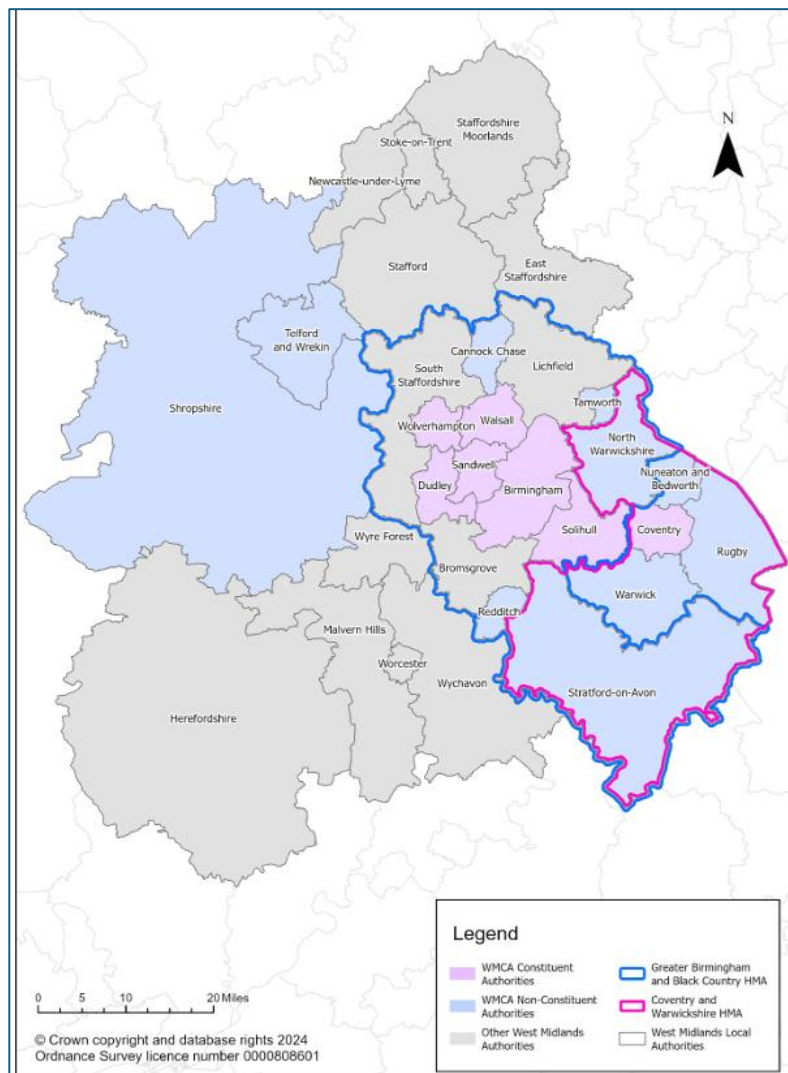
The purpose of this Statement of Compliance is to set out the extent of effective co-operation that has been undertaken and how this has been taken into account in the preparation of the SWLP to Publication (Regulation 19) stage. It identifies the relevant strategic matters and how they have been resolved – or if they have not, why not. It details who the South Warwickshire Councils have co-operated with and on which strategic matter(s), the nature and outcomes of the co-operation and how it has influenced the plan.

The NPPF sets out that authorities should produce, maintain and update one or more statement(s) of common ground (SoCG) throughout the plan making process in order to demonstrate that a Plan is based on effective co-operation. This Statement identifies the relevant SoCGs that Stratford-on-Avon and Warwick District Councils are currently signatories to, with the intention that additional SoCG will be sought with key partners as the plan-making process progresses. An updated version of this Compliance Statement will be produced ahead of submission of the Plan to update on the ongoing dialogue and engagement.

2. Strategic context of South Warwickshire

Figure 1: Greater Birmingham & Black Country (GBBC) and Coventry & Warwickshire (C&W) Housing Market Area (HMA) Boundaries

South Warwickshire sits most fully within the Coventry and Warwickshire (C&W) HMA, with Warwick District most strongly related to Coventry given its shared boundary and interrelationships with the city. However, South Warwickshire is also within the Greater Birmingham and Black Country (GBBC) HMA owing to Stratford-on-Avon District's shared boundaries and inter-relationships with



Solihull and Redditch borough and Bromsgrove district. Figure 1 illustrates the extent of both the GBBC and C&W HMAs.

In respect of elsewhere, although not within any other HMAs, South Warwickshire does share boundaries with a number of other authorities, namely:

- Cherwell District Council
- Cotswold District Council
- West Northamptonshire Council
- West Oxfordshire District Council
- Wychavon District Council.

A Functional Economic Market Area (FEMA) is the geographical area in which local economies and markets actually operate, generally extending beyond existing administrative boundaries. In relation to South Warwickshire, the 2022 Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA)

concluded that a similar boundary FEMA as for the Coventry & Warwickshire HMA is appropriate (Paragraph 1.1129). Additionally, paragraphs 1.1130 and 1.1131 go on to state that FEMA overlaps exist in Stratford-on-Avon with the Birmingham FEMA, mostly confirmed to those areas adjoining the Birmingham area such as Studley. It is understood that there is a separate FEMA relating to the Black Country authorities (Dudley, Sandwell, Walsall and Wolverhampton City Councils) and as such the South Warwickshire Councils would not be candidate authorities in meeting any unmet employment need arising from this area.

3. Bodies to co-operate with on the South Warwickshire Local Plan

National planning guidance sets out that in order to deliver strategic matters, authorities need to work alongside infrastructure providers, service delivery organisations, other strategic bodies, developers, landowners and site promoters. A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. The authority can use statements of common ground, or other evidence, to detail agreements with infrastructure providers which confirm this and set out the further work which they will undertake to support the long-term delivery of the strategy.

Table 1: Local Authorities relevant to the South Warwickshire Councils

| | |
|--|---|
| <p>Adjoining LPAs</p> <ul style="list-style-type: none"> • Bromsgrove District Council • Cherwell District Council • Cotswold District Council • Coventry City Council • Redditch Borough Council • Rugby Borough Council • Solihull Metropolitan Borough Council • West Northamptonshire Council • West Oxfordshire District Council • Wychavon District Council | <p>Other LPAs within the GBBCHMA</p> <ul style="list-style-type: none"> • Birmingham City Council • Cannock Chase District Council • City of Wolverhampton Council • Dudley Metropolitan Borough Council • Lichfield District Council • North Warwickshire Borough Council • Sandwell Metropolitan Borough Council • South Staffordshire District Council • Tamworth Borough Council • Walsall Council |
| <p>Other LPAs within the C&WHMA/FEMA, but not within the GBBCHMA</p> <ul style="list-style-type: none"> • Nuneaton and Bedworth Borough Council | <p>Relevant County Council</p> <ul style="list-style-type: none"> • Warwickshire County Council <p>Adjoining County Councils</p> <ul style="list-style-type: none"> • Gloucestershire County Council • Oxfordshire County Council • Worcestershire County Council |

Table 2: Other key organisations and infrastructure providers

| |
|--------------------|
| Environment Agency |
| Historic England |
| Homes England |
| Midlands Connect |
| National Grid |
| National Highways |

| |
|---|
| Natural England |
| NHS Coventry and Warwickshire Integrated Care Board |
| Severn Trent Water |
| South Warwickshire University Foundation NHS Trust |
| Transport for West Midlands (part of the WM Combined Authority) |

4. Identifying Strategic Matters

In order to identify and seek to resolve the strategic matters relating to the preparation of the SWLP, each of the three Regulation 18 stages (Scoping, Issues and Options, and Preferred Options) have included specific engagement with the Duty to Co-operate Bodies.

Scoping and Call for Sites consultation 10th May – 21st June 2021

Responses were received from the following duty to co-operate organisations.

| | |
|--|--|
| Bromsgrove District Council | Homes England (joint response with Morris Homes) |
| Cherwell District Council | Natural England |
| Cotswold District Council | North Warwickshire Borough Council |
| Cotswolds Conservation Board | Nuneaton and Bedworth Borough Council |
| Coventry City Council | Redditch Borough Council |
| Coventry and Warwickshire Clinical Commissioning Group (CCG) | Solihull Metropolitan Borough Council |
| Coventry and Warwickshire Local Enterprise Partnership (CWLEP) | South Worcestershire Councils |
| Environment Agency | Transport for West Midlands |
| Highways England | Warwickshire County Council |
| Historic England | Warwickshire Wildlife Trust |

[The Consultation Statement for the Scoping Consultation](#) sets out a summary of the key strategic and cross-boundary issues raised from Duty to Co-operate bodies on the Scoping Consultation. The key themes identified at that stage were as followed and were taken account of in the subsequent stage of plan-preparation – the Issues and Options consultation:

- Housing and Employment requirements and impacts, both those arising inside and outside of South Warwickshire
- Addressing the climate change and ecological emergencies
- Transport infrastructure
- Cotswolds National Landscape impacts
- Increasing recreational pressure in Worcestershire
- Health Needs
- Changing market trends and Covid19 pandemic recovery
- Power and broadband
- Green Belt
- Flood Risk
- Water Resources and Wastewater
- Education needs
- Strategic design principles to enhance regional connectivity
- E-infrastructure and other low-emission vehicles.

SWLP Issues and Options – 9th January – 6th March 2023

Responses were received from the following duty to co-operate organisations.

| | |
|---------------------------------------|---------------------------------------|
| Birmingham City Council | Cherwell District Council |
| Cotswold District Council | Coventry City Council |
| Dudley Metropolitan Borough Council | Environment Agency |
| Gloucestershire County Council | Historic England |
| National Highways | Natural England |
| Network Rail | North Warwickshire Borough Council |
| Nuneaton and Bedworth Borough Council | Office of Rail and Road |
| Rugby Borough Council | Sandwell Metropolitan Borough Council |
| Solihull Metropolitan Borough Council | South Staffordshire Council |
| South Worcestershire Councils | Transport for West Midlands |
| Warwickshire County Council | West Northamptonshire Council |
| Wolverhampton City Council | Worcestershire County Council |

[The Consultation Statement for the Issues and Options Consultation](#) sets out a summary of the key strategic and cross-boundary issues raised from Duty to Co-operate bodies on the Issues and Options Consultation. The key themes identified at that stage were as followed and were taken account of in the subsequent stage of plan-preparation – the Preferred Options consultation:

- South Warwickshire’s employment provision
- Housing Market Areas, Housing Shortfall and Duty to Cooperate agreements
- Gypsy and Traveller Accommodation
- Older People’s Housing, Specialised Accommodation and Extra Care
- Supporting Biodiversity
- Transport Impacts
- Impacts of development on neighbouring authorities
- Health needs
- Flood Risk
- Vale of Evesham Control Zone
- Heritage
- Landscape.

SWLP Preferred Options – 10th January – 7th March 2025

A summary of the responses received from Duty to Co-operate bodies to the SWLP Preferred Options consultation is available in the [Regulation 18 Statement of Consultation](#) (February 2026). Below is a summary table of all those responses received from Duty to Cooperate bodies, focusing on strategic matters. Full versions of these representations (plus those from other key statutory consultees) can be viewed on the SWLP website: [South Warwickshire Local Plan](#).

Table 3: Summary of responses received relating to strategic issues from relevant Local Authorities and key organisations on the Preferred Options consultation and how these are being sought to be resolved

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|-------------------------------|------------------|---|---|
| Birmingham City Council (BCC) | 06/03/2025 | <ol style="list-style-type: none"> 1. The revised standard method significantly reduces Birmingham’s housing shortfall. BCC will outline the new position in a revised Local Plan Preferred Options consultation. 2. BCC previously identified a shortfall of roughly 74 hectares of employment land. An update will be provided in the revised Preferred Options consultation. | <ol style="list-style-type: none"> 1. Noted. The BCC Focused Preferred Options consultation in autumn 2025 confirmed the much-reduced housing need figure for the city. 2. Ongoing. A shortfall in Birmingham’s employment land was still identified in the Focused Preferred Options. At a subsequent meeting between SDC and BCC in November 2025, it was indicated that the employment land shortfall could be met by increasing the allocation at the WM interchange or on BCC green belt sites. At the time of writing, the BCC Publication (Reg 19) Plan is awaited which is expected to provide a further update on this matter. |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|-----------------------------|------------------|--|---|
| Bromsgrove District Council | 07/03/2025 | <ol style="list-style-type: none"> 1. Settlements A1 and A2 would rely at least partly on infrastructure in Bromsgrove District due to the long-term nature of delivery and their proximity to the boundary. 2. Bromsgrove District Local Plan is under review. Growth options are not confirmed. Capacity of infrastructure to absorb both Bromsgrove's growth and the impacts of A1, A2, and SG22 is unknown. Clarity would be required on infrastructure delivery and phasing to confirm no adverse impacts on Bromsgrove District. 3. There would need to be evidence to justify selection of these sites above others which relate more closely to the main settlements and road network of South Warwickshire. Would also need evidence to demonstrate alternative non-green belt sites are unsuitable. | Superseded. No strategic level growth is proposed in the A1/A2 or Studley area in the Reg 19 SWLP. |
| Cherwell District Council | 07/03/2025 | <ol style="list-style-type: none"> 1. Keep CDC updated about all major residential, employment, commercial, leisure, or retail proposals potentially impacting Cherwell's infrastructure or the M40, particularly development at Gaydon, Lighthorne Heath, or Bishops Itchington. 2. Include text about economic, retail, leisure and tourism links between Cherwell and South Warwickshire. Note that nearby Cherwell residents also use facilities in South Warwickshire. | The Publication (Regulation 19) SWLP recognises the sub-regional context within which South Warwickshire sits and its relationships with neighbouring authorities and impacts on surrounding infrastructure. The Infrastructure Delivery Plan (Feb 2026) refers to the cross-boundary demands on infrastructure from development. |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|---------------------------|------------------|--|---|
| | | <ol style="list-style-type: none"> 3. Add reference to transport links between Cherwell and South Warwickshire including road, rail freight and supply networks. 4. Include reference to hospitals (including A & E) and schools serving cross-boundary areas. There is a need for cohesive engagement between different organisations on infrastructure capacity, potential for extensions, and the planning of new infrastructure. 5. All the above should be highlighted on a diagram showing links between adjacent authorities. 6. Add reference to Oxford airport and its services as this is less than an hour from the South Warwickshire boundary. Particularly relevant given proposals at Coventry airport. 7. Include text about the providers for water supply, sewerage and sewerage treatment work, their cross-boundary catchments, and the need to ensure sufficient capacity for committed developments and local plan allocations from various authorities. Infrastructure phasing is key. Note providers typically plan over five-year periods rather than longer local plan periods. | <p>Ongoing engagement with Severn Trent in the preparation of the Publication (Regulation 19) SWLP is set out in Section 5 of this Statement.</p> |
| Cotswold District Council | 06/03/2025 | <ol style="list-style-type: none"> 1. Support reinstatement of Honeybourne to Stratford railway line. Please also have regard to potential highway capacity issues on the B4632 spanning Cotswold and Stratford District. | <ol style="list-style-type: none"> 1. Noted and Ongoing. Impacts from the SWLP on cross boundary routes such as the B4632 will be considered in the transport modelling. The Honeybourne to Stratford railway line |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|---|------------------|--|---|
| | | <p>2. Cotswold District Council is retaining a policy on the Vale of Evesham Control Zone until an alternative approach is agreed.</p> | <p>to be safeguarded for future reinstatement.</p> <p>2. Noted. SDC are aware that Wychavon DC and Worcestershire CC no longer feel that a policy response to this issue is necessary. The Policy is proposed to be carried forward into the Publication (Regulation 19) SWLP.</p> |
| Coventry and Warwickshire Integrated Care Board (ICB) | 04/03/2025 | <p>1. Existing primary medical care capacity in South Warwickshire is insufficient to meet the proposed housing growth. The ICB will require suitable provisions to be put in place and adequate allowances in the Section 106 and Community Infrastructure Levy (CIL) framework.</p> <p>2. The ICB would like to engage on projects and schemes which will require support. There will need to be collaboration between the ICB, health and care partners, and the Councils. This should have regard to the Integrated Care System's 10-year Infrastructure Strategy.</p> <p>3. Information needs to be shared with the ICB as soon as possible on the likely population profile of planned housing developments to enable the ICB to plan for likely health needs and how to communicate with population sub-groups.</p> | <p>The South Warwickshire Councils have engaged with the Coventry and Warwickshire ICB in the production of the Publication (Regulation 19) SWLP. Further information on health infrastructure is also provided in the Infrastructure Delivery Plan (IDP). See Section 5 of this Statement for more details on the ongoing engagement with the ICB.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|-----------------------|------------------|--|---|
| | | <p>4. Fully consider the importance of good public transportation for accessing GP practices.</p> <p>5. Mindful of impact of a broad range of issues on health and wellbeing, including air quality and green space availability. Support Draft Policy Direction 30 and use of Health Impact Assessments. ICB will work with the Councils to inform any future Health Impact Supplementary Planning Document.</p> | |
| Coventry City Council | 07/03/2025 | <p>1. Object to further significant growth in SG01. Green Belt parcels COV4, KEN3, and KEN4 should be assessed 'strong' in GB contribution due to role in preventing merger of Kenilworth and Coventry. Ecological designations in SG01 should be protected. SA highlights area as one of the worst-performing. Return Westwood Heath safeguarded land to GB.</p> <p>2. Areas outside South Warwickshire's boundaries should be greyed out on mapping and not assessed without agreement from the relevant Council.</p> <p>3. Within SG01, also particularly object to HELAA sites 226, 122, 103.</p> <p>4. Support allocation of Coventry Airport (SG03 & MIS4).</p> <p>5. Clarify Draft Policy Direction 4 to state that shortfalls should be allocated within the HMA and make clear which sites are selected for that purpose. Coventry is also seeking help from neighbours to meet 45 hectares of unmet employment need.</p> | <p>1. Noted. It is also important to note that Warwick District Council has engaged positively with key partners within this area, including Coventry City Council (also including Warwickshire County Council and the University of Warwick) through the North of Kenilworth, South of Coventry (NoKsoC) Masterplanning Project Board. Coventry City Council has been an active participant in the group.</p> <p>Stage 2 of the Green Belt Review has subsequently been produced. This provides more detailed evidence on some areas and refreshes the study in response to changes to national planning policy. The updated study does show that a number of parcels in this area do contribute strongly when</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|--------------|------------------|---|--|
| | | <p>6. Development of University of Warwick main campus must accord with Masterplan SPD. The reference to further development and a link road in MIS.7 is not in accordance.</p> | <p>considered against the purposes of including land in the Green Belt. The Green Belt Exceptional Circumstances topic paper sets out the exceptional circumstances to justify green belt release in this area, focussing on the potential to deliver development in a sustainable location whilst also addressing an existing and increasing highway capacity issue in the south of Coventry/north of Kenilworth area. The currently safeguarded land is considered to be an appropriate and sustainable location to contribute towards meeting the extensive housing needs of South Warwickshire.</p> <p>Ecological designations in the COV.1 (formerly SG01 area) are proposed to be protected. Furthermore, a large biodiversity enhancement area is proposed, connecting existing areas such as mature/ancient woodland.</p> <p>2. Agreed. Areas outside of South Warwickshire's have been excluded from any site allocations/assessment. Any proposed site extent extending into</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|--------------|------------------|-------------------------|--|
| | | | <p>Coventry's administrative area at Regulation 18 was done so in error.</p> <p>3. Noted. Site 226 (in Baginton) is not included in the Regulation 19 Publication Plan. The other sites are considered to be appropriate sites in a sustainable location.</p> <p>4. Support noted. The Coventry Airport site is included as an allocation in the plan.</p> <p>5. The South Warwickshire authorities note that Coventry does not believe it can meet its identified employment needs and that CCC has asked if Warwickshire authorities could address this unmet need. At the time of writing, the extent of Coventry's unmet need it uncertain, however, the SWLP proposes some headroom through allocating land for employment purposes. Therefore if it is established through Coventry's Local Plan Examination that they have an unmet need, and the extent of it, the South Warwickshire authorities expect to have the ability to address a proportionate amount of this unmet need.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|-------------------------------------|------------------|---|--|
| | | | 6. We agree that the development of the University of Warwick main campus should accord with the Masterplan contained within the currently adopted SPD (although note that SPDs no longer form part of the new plan making system). A policy relating to the University of Warwick Main Campus Area is included within the SWLP. |
| Dudley Metropolitan Borough Council | 03/03/2025 | <ol style="list-style-type: none"> 1. The housing shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) should be addressed with development in the most sustainable locations where sustainable commuting links to the wider conurbation are provided. 2. Support allocation of new settlements. These can generate significant housing and associated employment, justifying significant infrastructure and transport improvements. 3. Welcome reference to the West Midlands Strategic Employment Sites Study (WMSESS) as this assists in meeting an identified regional need for strategic employment sites. 4. Welcome the approach of identifying reserve sites. However, shortfalls have been identified beyond 2031. Further details will need to be considered for release mechanisms. | <p>1 and 4. Noted. Ongoing engagement, evidence gathering and dialogue has taken place on any unmet need arising from outside of South Warwickshire that may need to be accommodated within the area. See Section 5 for details of ongoing engagement.</p> <p>2 & 3 – Noted.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|------------------|------------------|---|---|
| Historic England | 06/03/2025 | <ol style="list-style-type: none"> 1. Sites with development potential will need further detailed assessment. This should include settlement character and non-designated assets. These may not be recorded on the Historic Environment Record (HER) and can be identified using LiDAR (Light Detection and Ranging). 2. Use the Site Selection Methodology outlined in Advice Note 3. Detailed Heritage Impact Assessments and archaeological surveys should be prepared for site allocations. 3. Suggest Strategic Objective 8 amended from 'protecting' to 'conserving' to reflect the NPPF. 4. Suggest HER is used as an additional indicator in the Sustainability Appraisal (SA) framework. 5. Oppose allocation of C1 as a new settlement as it is the most sensitive location. Potentially object to B1, X1, and X2. Concerns relating to A1, E1, and F2. 6. Potentially object to SG01, SG02, SG04, SG09, SG11, SG15 and SG21. Concerns on SG06, SG12, SG13, SG16, SG18, SG19, and SG23. Limited concerns on SG03, SG05, and SG14. 7. Assess potential impacts on historical environment when amending settlement boundaries. 8. Tourism plays a spatially significant role and should be addressed in Part 1 rather than Part 2. 9. Draft Policy D should refer to 'heritage' rather than 'local heritage' and refer to both designated and non- | <p>The impact on heritage has been considered as part of site selection of development sites, this includes work on progressing Heritage Impact Assessment (HgIA) by consultants. Heritage policies are included within the Publication (Regulation 19) SWLP which seeks to address the comments made by Historic England, including a requirement for applicants to refer to Historic England guidance at the planning application stage.</p> <p>5. and 6. A number of the potential new settlement locations (eg. X1, X2, A1 and F2) of particular concern to HE are no longer proposed for allocation. The scale of the allocations at Strategic Growth Locations has been reduced in a number of cases and recommended mitigation from the HgIA included in the relevant policies.</p> <p>4. The SA does include an indicator 'Effect on features identified in the Historic Environment Record (HER).'</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | designated heritage assets. Draft Policy Direction 27 should refer only to World Heritage Sites as of Outstanding Universal Value, not all heritage assets. | 8. Tourism is being addressed in the Publication (regulation 19) SWLP. |
| National Highways | 07/03/2025 | <ol style="list-style-type: none"> 1. SG01, SG02, SG03, SG04, SG07, SG08, SG09, SG10, SG11, SG13, SG14, SG18, SG20, SG21 and SG24 are near the Strategic Road Network (SRN). Sites taken forward must have suitable transport evidence. Consult National Highways on sites with potential impacts. Assess in line with Department for Transport (DfT) Circular 01/022. Cumulative impacts need assessment. 2. Depending on the scale of likely impacts, the applicant/developer may need to identify suitable mitigation measures. 3. Potential new settlements G1, X1, X2, BW, B1, C1, A1 and A2 are near the SRN. All sites taken forward should have suitable transport evidence. 4. Please ensure references to 'Highways England' are updated to National Highways in the Infrastructure Delivery Plan (IDP) 5. Land at Red House Farm and Wedgnock Park Farm strategic employment sites border the SRN. Would likely be significant impacts. These sites would need to be supported by a detailed transport evidence base to determine impacts and mitigation requirements. | Ongoing engagement, evidence gathering and dialogue has been had with key transport partners, including National Highways, in the preparation of the Publication (Regulation 19) SWLP. See Section 5 of this Statement for details on this. |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|-----------------|------------------|---|---|
| | | <ul style="list-style-type: none"> 6. The impacts of releasing the existing Jaguar Land Rover allocation to the wider market would also need to be assessed to determine impacts on the M40. 7. Major Investment Sites MIS.1, MIS.4, MIS.6, and MIS.7 may lead to impacts on the SRN which will need to be considered as part of the transport evidence base. 8. Proposals for renewable energy generation and storage near to the SRN would require review and consultation with National Highways. 9. Proposals for water supply and wastewater infrastructure near the SRN would require a flood risk assessment and drainage strategy to be reviewed and agreed prior to permission, as would any development proposals near the SRN. | |
| Natural England | 24/02/2025 | <ul style="list-style-type: none"> 1. Mitigation and avoidance measures identified through the Habitats Regulations Assessment (HRA) should be secured through policies in the Plan. Where mitigation/avoidance is not possible, sites should not be allocated. 2. Will need clarity on how the Strategic Environmental Assessment/SA has informed site selection and mitigation. Would expect significant measures to protect designated sites if new settlements BW and F1 are selected given their scale and proximity. Several allocations are also within the Impact Risk Zones for Sites of Specific Scientific Interest. | <p>Ongoing engagement, evidence gathering and dialogue has been had with key environmental partners, including Natural England, in the preparation of the Publication (Regulation 19) SWLP which includes an updated HRA and SEA/SA. See Section 5 of this Statement for details on this.</p> <p>3.The Publication (Regulation 19) SWLP includes a policy on mitigation and</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|--------------|------------------|--|--|
| | | <p>3. Criteria-based policies should guide development, including application of the mitigation hierarchy and direct, indirect and cumulative impacts. Seek Natural England advice on any strategic-level mitigation solutions. Robust evidence would be required.</p> <p>4. Policy Direction 49 could be strengthened. Should be core policies for protection of Best and Most Versatile Agricultural Land and protection and sustainable management of soils. Policy should also make clear that areas of poorer land quality are generally preferred for development over areas of higher quality.</p> <p>5. Soils of high environmental value are part of the nature recovery network and green infrastructure. Soil handling and sustainable soil management strategies should be required for sites over 5 hectares. Would welcome extension of this to sites of 1-5 hectares. Refer to Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.</p> <p>6. For temporary forms of development there should be plans to restore land to former quality.</p> <p>7. Soil issues should be referred to in renewable energy, climate change, green infrastructure, biodiversity net gain, flooding, design and landscaping policies.</p> | <p>compensation, and the hierarchy is clearly outlined within this, and referenced in other policies throughout the plan.</p> <p>4. A policy on agricultural land and soils is included within the Publication (Regulation 19) SWLP which states lower grade agricultural land is prioritised for development. A policy on Large Scale renewable energy also directs away from using BMV land.</p> <p>5. A policy on Agricultural Land and Soils in the Publication (Regulation 19) SWLP sets out that these strategies must be provided.</p> <p>6. A policy is included within the Publication (regulation 19) SWLP on new large scale renewable energy generation and storage which states that proposals must include a restoration and decommissioning plan which sets out the restoration of soil quality and agricultural land where appropriate. A Policy on Agricultural</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
|---------------------------------------|------------------|--|---|
| | | | <p>land and Soils refers to sustainable management of soils.</p> <p>7. These issues have been addressed in policies in the Publication (Regulation 19) SWLP.</p> |
| Nuneaton and Bedworth Borough Council | 03/03/2025 | 1. No strategic cross-boundary issues identified in response. | 1. Noted |
| Oxfordshire County Council | 26/02/2025 | <p>1. Key transport links between South Warwickshire and Oxfordshire are railway lines and roads such as the M40, A44, A429 and A423. Growth may worsen capacity issues on these routes.</p> <p>2. There will need to be improvements to stations and trains on the Chiltern Mainline.</p> <p>3. North Cotswold Line is constrained by its hourly service. Oxfordshire County Council and partners are seeking DfT support to provide a half-hourly service.</p> <p>4. Aware of the refreshed business case for reopening the Stratford-Honeybourne line and agree a Worcestershire-Stratford-Leamington sub-regional transport strategy is needed to identify investment required to support growth proposals in the area.</p> <p>5. Further work on rail infrastructure is needed prior to the Regulation 19 Plan. The IDP must make clear what improvements are needed and ensure delivery.</p> | <p>Noted. Ongoing engagement, evidence gathering and dialogue has been had with key transport partners in the preparation of the Publication (Regulation 19) SWLP. See Section 5 of this Statement for details on this. Work is on-going, including potential impacts outside core model areas and the Councils will continue to liaise with neighbouring authorities</p> <p>The route to enable the reinstatement of the Honeybourne-Stratford rail line is being safeguarded within the Publication (Regulation 19) SWLP.</p> <p>An updated IDP accompanies the Publication (Regulation 19) SWLP.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| Redditch Borough Council | 07/03/2025 | <ol style="list-style-type: none"> 1. Potential new settlements A1 and A2 would rely at least partly on infrastructure in Redditch Borough due to the long-term nature of delivery and their proximity to the boundary. 2. Borough of Redditch Local Plan is undergoing review. Growth options are not confirmed. The capacity of infrastructure to absorb both Redditch's growth and the impacts of A1, A2, and SG22 has not been established. Clarification on infrastructure delivery and phasing would be required to confirm no adverse impacts on Redditch Borough. 3. If A1 and A2 come forward, there would need to be evidence to justify their selection above sites more closely related to the main settlements and road network of South Warwickshire. 4. The A435 severs potential for active travel between A1, A2, and Redditch so these new settlements would generate a significant number of short car journeys to Redditch. | Superseded. No strategic level growth is proposed in the A1/A2 or Studley area in the Reg 19 SWLP. |
| Rugby Borough Council | 07/03/2025 | <ol style="list-style-type: none"> 1. HELAA Ref ID 695: note the adjacent employment land allocation in the Preferred Options Rugby Borough Local Plan. A neighbouring secondary school in Rugby is close to capacity. Any allocation should evidence how education needs will be provided. The adjacent Parish of Ryton-on-Dunsmore has an NDP and should be consulted if this site is taken forwards. | 1. Superseded. HELAA Site 695 was sifted out at longlisting stage of the non-strategic sites allocation process. It is also noted that in RBC's submitted plan, the employment site that had been proposed near to the Warwick District boundary is not included. |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>2. RBC has an unmet need for Gypsy and Traveller pitches. Most pitches are within 3km of Coventry's boundary. There may be scope to provide for some of RBC's unmet need as the SWLP identifies several sites in rural areas adjoining Coventry.</p> | <p>2. Ongoing. Following a specific DtC request in April 2025, both SDC and WDC responded to RBC in August 2025 stating that given the challenge in providing gypsy and traveller pitches in both Stratford and Warwick Districts, they would not be able to assist RBC with meeting its needs for gypsy and traveller pitches.</p> |
| Sandwell Metropolitan Borough Council | 05/03/2025 | <p>1. A GBBCHMA Strategic Growth Study refresh has been commissioned to estimate housing shortfall against 2024 Local Housing Need baseline. Appears conurbation will still struggle to meet needs. Possibly shift in unmet need from Birmingham to Solihull and Black Country.</p> <p>2. Welcome the offer to assist in meeting shortfall. South Warwickshire is one of the strongest housing markets in the West Midlands. Growth proposals will need to be mindful of recommendations of the New Towns Task Force.</p> <p>3. Potential new settlements A1, A2, and C1, and growth locations SG23 and SG24 are located where connection to the West Midlands conurbation is likely strong. Assessment of New Settlements should assess how each option relates to locations of unmet housing needs.</p> | <p>1 -5. Noted. Ongoing engagement, evidence gathering and dialogue has been had on any unmet need arising from outside of South Warwickshire that may need to be accommodated within the area. See Section 5 for details of ongoing engagement.</p> <p>6. Noted.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <ol style="list-style-type: none"> 4. B1 is well-located to serve GBBCHMA need and is rail-served. A1 and A2 appear from existing analysis to be less suitable although they may also be potentially linked to the rail network. 5. The approach for triggering release of reserve sites when a neighbouring authority could not demonstrate a five-year supply appears new and not clear how this would work in practice. 6. Welcome identification of potential locations for strategic employment sites as identified in WMSESS and plans for continued growth of well-established regionally important assets | |
| Solihull Metropolitan Borough Council | 07/03/2025 | <ol style="list-style-type: none"> 1. Core Opportunity area includes Burton Green adjoining the boundary and Major Investment Sites e.g. the University of Warwick lie in the north of the plan area. Significant economic development or expansion may have economic and transport implications. 2. Object to SG24 as Hockley Heath is a small-scale settlement. There is insufficient infrastructure to support significant adjoining development and there could be unacceptable amenity and character impacts. 3. If SG24 proceeds there would need to be cross-boundary agreement on provision of education, a doctor's surgery, pharmacy, and public transport. CIL | <p>1. The Core Opportunity Area will be a general focus for employment development. However, this does not mean that all land within that area will automatically be assumed to be suitable for such purposes. The SWLP seeks to protect Burton Green both through preserving existing Green Belt and also proposing a Biodiversity enhancement area. The University of Warwick however will continue to be supported as a major employer and world-class institution. The proposals within the COV.1 area of the SWLP seek to help address existing transport issues within the area.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>and S106 payments should be given to SMBC to spend in consultation with Warwickshire.</p> <p>4. SMBC would welcome opportunity to review and comment on the evidence presented in the Stage 2 Green Belt Assessment in relation to sites in the vicinity of Hockley Heath.</p> | <p>2-4. Strategic growth at Hockley Heath is not being progressed within the Publication (Regulation 19) SWLP.</p> |
| <p>South Warwickshire University NHS Foundation Trust</p> | <p>07/03/2025</p> | <p>1. The proposed increase in housing in both Warwick and Stratford Districts will place a significant burden on already pressured healthcare services, and if not fully mitigated will put existing services at risk. Therefore, welcome the proposals in the plan such as affordable housing, engagement with infrastructure providers and co-location of services.</p> | <p>Noted. Ongoing engagement, evidence gathering and dialogue has been had with key healthcare partners, including the South Warwickshire University NHS Foundation Trust, on healthcare facilities within the area. See Section 5 for details of ongoing engagement to inform the Publication (Regulation 19) SWLP.</p> |
| <p>Transport for West Midlands (West Midlands Rail Executive)</p> | <p>19/05/2025</p> | <p>1. New station between Leamington Spa and Banbury to support F1, F2, F3, G3 is likely unviable. Impacts of slowing down services on journey times for existing passengers, performance risks, network capacity impacts, and on-train capacity would outweigh benefits. Latest industry cost of new stations is £20-30 million. If a new service was introduced in longer term, there would be similar incentives to run non-stop between Leamington and Banbury. Strongly recommend bus-based public transport solutions if sites progress.</p> | <p>Ongoing engagement, evidence gathering and dialogue has been had with key transport partners, including West Midlands Rail Executive, in the preparation of the Publication (Regulation 19) SWLP. See Section 5 of this Statement for details on this.</p> <p>1. None of the potential new settlement locations at F1, F2, F3 or G3 are being progressed in the SWLP.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>2. For site E1, a positive business case is difficult to achieve for reopening Stratford-Honeybourne. This would require an affordable solution to reinstatement through Stratford. Would also depend on unfunded upgrades to North Cotswold Line. Strongly recommend bus-based transport solution developed for site E1 if progressed.</p> <p>3. For sites A1, A2 and BW the current Snow Hill Line timetable is likely to remain for foreseeable future. Would like to add 2nd Whitlocks End service to Stratford calling at Wythall, Henley-in-Arden and Stratford Parkway. However, this would require successful DfT/Great British Railways funding bids, as well as railway industry and County Council consultation on the case for stops to serve new housing clusters. Alternative of extending Whitlocks End service to Earlswood requires significant investment and additional operating costs without benefits of serving Henley or Stratford. Unlikely a positive business case could be produced.</p> <p>4. For sites B1 and C1, the aspiration in the 2022 West Midlands Rail Investment Strategy is for the current 2-hourly Birmingham – Leamington Spa service calling at Hatton and Lapworth to become hourly, with a similar increase to an hourly train at Hatton on the Stratford-Leamington service. Also, an option to retain the Lapworth stop in the hourly Birmingham-</p> | <p>3. None of the potential new settlement locations at A1, A2 or BW are being progressed in the SWLP.</p> <p>4. and 5. Noted. The allocation of B1 (now HAT.1 – Hatton) is being progressed and specific references to improving links to facilitate walking and cycling from the new settlement to Warwick Parkway station have been included.</p> |

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| | | <p>Stratford service via Solihull. This is likely the maximum service level that could be supported.</p> <p>5. If option B1 is progressed, improved walking and cycling access to Warwick Parkway should be considered as there is a more regular service between Birmingham, Solihull, Warwick, Leamington Spa, Banbury, and London Marylebone.</p> | |
| Walsall Council | 16/01/2025 | <ol style="list-style-type: none"> 1. Walsall has an estimated shortfall of 15,000 homes between 2024 and 2042. Notwithstanding the historically limited functional relationship between the Black Country and South Warwickshire, the land capacity constraints will have a ripple effect across the wider HMA. 2. Walsall will need to work with authorities across the HMA to meet needs, including authorities with land beyond the Green Belt in accordance with the NPPF's sequential approach. 3. Contributions to meet the shortfall of employment land in the Black Country have now been confirmed in Local Plans from immediate neighbours so employment is not an issue where the relationship with Walsall or the Black Country generally needs explicit consideration. | <p>1 -2. Noted. Ongoing engagement, evidence gathering and dialogue has been had on any unmet need arising from outside of South Warwickshire that may need to be accommodated within the area. See Section 5 for details of ongoing engagement.</p> <p>3. Noted. Agree that there is a limited functional relationship between Walsall and South Warwickshire.</p> |
| Warwickshire County Council | March 2025 | <p>Transport</p> <ol style="list-style-type: none"> 1. Development likely to be focused on the North of Kenilworth and South of Coventry area. Transport | <p>Transport – Noted. Ongoing engagement, evidence gathering and dialogue has been had with key transport partners, including</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>infrastructure in the North-South corridor is key to support the Plan as a whole.</p> <ol style="list-style-type: none"> 2. WCC have identified need for a new railway station and multi-modal transport interchange to serve the University of Warwick and its hinterland. This will require land to be safeguarded. 3. There will be a staged approach with the site initially used for bus-based park and ride, then Very Light Rail, and finally by heavy rail. <p>Strategic Housing and Employment</p> <ol style="list-style-type: none"> 4. Support new settlements. Funding mechanisms and timing of key infrastructure must be fully addressed. Strategic Growth Areas and New Settlements need IDPs with measurable goals/deadlines. Developers/landowners should sign equalisation agreements where appropriate to ensure a shared approach. Consider integrating renewables on strategic sites. 5. Have made detailed comments on each new settlement and strategic growth area with regards to minerals and waste, transport infrastructure, and education impacts. 6. Would expect other areas to undertake their own Green Belt reviews before looking for their needs to be delivered by South Warwickshire. | <p>Warwickshire County Council highways, in the preparation of the Publication (Regulation 19) SWLP. See Section 5 of this Statement for details on this.</p> <p>Strategic Housing and Employment - Noted. An updated Infrastructure Delivery Plan (IDP) accompanies the Publication (Regulation 19) SWLP. Ongoing engagement, evidence gathering and dialogue has been undertaken with key partners, including Warwickshire County Council, regarding infrastructure requirements including transport and education.</p> <p>Housing Tenure and Type - Ongoing engagement with WCC housing services has been undertaken in the preparation of the Publication (Regulation 19) SWLP. This includes the requirement for an extra care facility within the Bidford Strategic Growth Location in order to meet identified needs. A policy on Specialised Housing is included within the Publication</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>7. Ensure existing and proposed employment sites are accessible by active and public transport and new settlements have suitable employment offers satisfying different types of need.</p> <p>Housing Tenure and Type</p> <p>8. Explore land safeguarding and developer contributions for care infrastructure. Would welcome a Plan commitment to support the County Council in meeting the Extra Care ‘gap’.</p> <p>9. Supported Living & Specialised Supported Housing should be incorporated into large sites.</p> <p>10. Draw on the place-based Joint Strategic Needs Assessments (JSNAs) when formulating policies and master-planning sites. Ensure the Plan supports each District’s Homeless Strategy and the Warwickshire-wide homelessness strategy.</p> <p>Climate Change/Environment</p> <p>11. WCC Ecology would like climate policies to include a porous surface metric requiring compensation where there is residual loss. The filters outlined in table 7 for Draft Policy E should follow the methodology in the Warwickshire Local Nature Recovery Strategy mapping.</p> <p>12. Detailed comments provided on policies relating to climate-resilient design. Policies should be specific</p> | <p>(Regulation 19) SWLP to address future proposals for these types of developments.</p> <p>Both Councils are preparing a Housing Strategy to address the needs of homeless people.</p> <p>Climate Change/Environment These comments are addressed through the wider environmental, biodiversity, green infrastructure and flood risk policy framework rather than being duplicated within the renewable energy policies themselves.</p> <p>Public Health Noted. The South Warwickshire Councils have engaged with key healthcare providers in the production of the Publication (Regulation 19) SWLP. See section 5 of this Statement for more details on this. An updated HIA has been completed alongside the Publication (Regulation 19) SWLP along with a Policy on Health Impact Assessments.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>on compensation required for proposals that do not meet policy requirements.</p> <p>Public Health</p> <p>13. Suggest use of Warwickshire’s Joint Health and Wellbeing Strategy which highlights priorities that need additional consideration through the Health Impact Assessment (HIA) process.</p> <p>14. In section 9.2 it would be useful to define a major development and offer direction on suitable HIA tools to use, such as the London Healthy Urban Development Unit Tool (HUDU). Point towards the Warwickshire JSNAs and health inequalities dashboard as potential sources.</p> <p>15. When considering specialist housing for the Strategic Housing Market Assessment, recommend referring to the JSNAs, particularly the Adults with a Learning Disability and Healthy Ageing JSNAs.</p> <p>16. Suggest recommending the Healthy Streets Design Tool to ensure developments create environments that prioritise residents’ health and wellbeing. Recommend policy limiting concentrations of hot food takeaways to avoid widening health inequalities.</p> <p>17. Should seek to create lifetime neighbourhoods which people of all ages and abilities can access and enjoy safely.</p> | <p>The 20-minute neighbourhood concept is a key aspiration of the SWLP.</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| West Northamptonshire Council | 05/03/2025 | <ol style="list-style-type: none"> 1. Support proposals to retain Stratford District’s Special Landscape Area (SLA) designations and extend these to cover Warwick District. When determining boundaries of these designations, please have regard to bordering SLA designations in West Northamptonshire. | Noted. |
| Worcestershire County Council | 04/03/2025 | <ol style="list-style-type: none"> 1. No definitive information provided on deliverability of improvements to the A46 corridor. Impacts and mitigation measures on the A46 outside of Warwickshire need to be considered. 2. Support proposals for a station at Long Marston with links to Stratford and Honeybourne, noting these are currently unfunded, and welcoming discussions on any short-term approaches to reduce pressure on roads around Honeybourne and station car parking. 3. Seek further engagement to understand trip rates/distribution from new settlements and cumulative impacts (particularly at Redditch and Evesham), the expected level of cross-boundary movements, potential mitigation measures to support these, and any necessary highway capacity improvements in Worcestershire. 4. Would welcome opportunities to provide technical input into evidence base documents regarding a ‘vision and validate approach’ to transport and coordinating enhancements with Worcestershire’s Local Cycling and Walking Infrastructure Plan | <p>Ongoing engagement, evidence gathering and dialogue has been had with key transport partners in the preparation of the Publication (Regulation 19) SWLP, and transport modelling is being published alongside the SWLP at Publication Stage. See Section 5 of this Statement for details on this. Ongoing engagement will be undertaken as the plan progresses. Work is on-going, including potential impacts outside core model areas and the Councils will continue to liaise with neighbouring authorities</p> <p>The Honeybourne-Stratford route is being safeguarded in the Publication (Regulation 19) SWLP to enable future reinstatement.</p> <p>On advice from Warwickshire County Council highways, the Vale of Evesham</p> |

| Organisation | Date of response | Strategic Issues raised | Progress made on the issue at Publication (Regulation 19) Stage |
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| | | <p>5. Support discussions with the SWLP team and Warwickshire County Council regarding the Vale of Evesham Control Zone and/or potential alternative approaches.</p> | <p>Control Zone Policy is being carried forward into the Publication (Regulation 19) SWLP.</p> |
| <p>Wychavon District Council (on behalf of South Worcestershire Councils)</p> | <p>06/03/2025</p> | <ol style="list-style-type: none"> 1. Potential new settlement E1 and strategic growth option SG20 would impact the road network around the Vale of Evesham. There would need to be a detailed transport assessment with involvement from the SWCs and Worcestershire County Council. 2. Potential environment and heritage impacts, particularly in Pebworth. The Neighbourhood Plan highlights routes through the village as important and valued visual assets. 3. Support mitigation through high-quality transport links to and from Long Marston. Would welcome reinstatement of the Honeybourne to Stratford line and provision of a station at Long Marston. Potential for strategic benefits through a new 'arch' connecting Worcester, the settlement at Worcestershire Pathway, and urban areas in north Warwickshire. 4. Impacts of Heavy Goods Vehicles in Vale of Evesham can be addressed through a planning validation requirement for transport assessments and statements. The Review of the South Worcestershire Development Plan is not taking a control zone forward so for consistency a specific policy is not appropriate. | <ol style="list-style-type: none"> 1. Ongoing engagement, evidence gathering and dialogue has been had with key transport partners in the preparation of the Publication (Regulation 19) SWLP. See Section 5 of this Statement for details on this. Work is on-going, including potential impacts outside core model areas and the Councils will continue to liaise with neighbouring authorities. 2. The impact on heritage has been considered in the selection of sites put forward in the Publication (Regulation 19) SWLP. 3. Noted. The Honeybourne-Stratford route is being safeguarded in the Publication (Regulation 19) SWLP to enable future reinstatement. 4. On advice from Warwickshire County Council highways, the Vale of Evesham Control Zone Policy is being carried forward into the Publication (Regulation 19) SWLP. |

At the 2025 Preferred Options stage, **no response** was received from the following duty to co-operate bodies:

Neighbouring Authorities

- West Oxfordshire Council

GBBCHMA Authorities

- No response received except from the following Birmingham City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council and Walsall Council

Adjoining County Councils

- Gloucestershire County Council

Prescribed Bodies

- Environment Agency
- Civil Aviation Authority
- Homes England
- Office for Road and Rail
- Warwickshire, Coventry and Solihull Local Nature Partnership

5. Unresolved Strategic Matters following Preferred Options consultation

The SWLP Councils identified a number of potential cross-boundary challenges and opportunities following the consultation on the SWLP at Preferred Options Regulation 18 stage and have undertaken ongoing dialogue and engagement with neighbouring authorities and other relevant bodies in an attempt to resolve outstanding strategic issues in the preparation of the Publication (Regulation 19) version of the SWLP.

These are summarised in the below sections:

- A. Accommodating unmet development needs arising from outside South Warwickshire
- B. Gypsy and Traveller Accommodation provision
- C. Transport impacts arising from the SWLP growth strategy
- D. Ensuring the necessary supporting infrastructure, in particular health, education and power provision, accompanies the growth proposed in the SWLP and where this may have implications for adjacent areas, taking account of timing and delivery.
- E. Implications for environmental assets
- F. Strategic issues in terms of approach to flood risk from all sources now and in the future
- G. Strategic Site Delivery – engagement with Homes England and neighbouring authorities

A. Accommodating unmet development needs arising from outside South Warwickshire

Background Context

Under the Duty to Co-operate, the Council was obliged to engage proactively with authorities where there is a demonstrable functional housing or employment relationship to consider whether any unmet needs arising from those areas need to be accommodated within the South Warwickshire Local Plan. Paragraphs 24-28 of the NPPF set out the importance of maintaining effective cooperation on strategic matters.

Whilst both Stratford-on-Avon and Warwick Districts are located within the Coventry and Warwickshire Housing Market Area (HMA) which consists of 6 planning authorities, only Stratford-on-Avon District also falls within the Greater Birmingham and Black Country (BCCS) HMA which consists of 14 planning authorities.

In terms of employment need, both Stratford-on-Avon and Warwick Districts fall within the Coventry and Warwickshire Functional Employment Market Area (FEMA). Stratford-

on-Avon District also sits within the Birmingham FEMA. A separate FEMA exists for the Black Country authorities of Dudley, Sandwell, Walsall and Wolverhampton.

To this end both Stratford-on-Avon and Warwick District Councils undertake continued dialogue and engagement with the authorities that it has functional housing and employment relationships with. This includes:

- Both Councils attend monthly Coventry, Solihull and Warwickshire Planning Officer Working Group (CSWAPO) meetings which includes Local Plan progress and strategic cross-boundary issues.
- Stratford-on-Avon District Council attends monthly Greater Birmingham and Black Country (GBBC) HMA Development Needs Officer Group meetings; and Warwick District Council also attends periodically.

Stratford-on-Avon District also has a number of other neighbouring authorities, namely:

- Cherwell District Council
- Cotswold District Council
- West Northamptonshire Council
- West Oxfordshire District Council
- Wychavon District Council

What is the issue?

At the Preferred Options consultation, a number of authorities raised the strategic issue of the SWLP needing to consider whether it should accommodate any unmet needs from outside of the area.

Existing Position Statements

GBBC HMA

As part of the commitment to evidence duty to co-operation requirements, [a Statement of Common Ground regarding the housing shortfall position across the GBBC HMA \(as at November 2024\)](#) was signed by a number of the authorities, including Stratford-on-Avon District Council. The Statement sets out the position with regards to unmet housing needs as at November 2024 and in accordance with the NPPF in operation at that time (2023 NPPF).

The Statement recognised that the nature and extent of shortfalls across the HMA may change and may need to be reflected in a future Statement of Common ground and/or plans. Section 6 of the Statement acknowledges that the existing evidence base is in need of review to allow for an up-to-date picture on unmet housing needs across the HMA beyond 2031, with the intention that the Statement would be revisited when an updated Strategic Growth Study is published and has been agreed.

Coventry & Warwickshire HMA

Similarly, across the [Coventry & Warwickshire HMA and FEMA, a Memorandum of Understanding \(MoU\) has been signed by the authorities](#) in 2025, and specifically relates to matters of strategic importance specifically relating to housing and employment needs across the area. The MoU confirms the housing required to be provided for by authority and commits each of the local authorities to ongoing cooperation and engagement in relation to the delivery of housing and employment land. Should any authority identify a shortfall, the MoU commits the local authorities to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.

In relation to employment needs, the MoU confirms that Coventry City Council (CCC) cannot meet its residual need and requested assistance from partners across the FEMA to help meet this shortfall. CCC has since submitted its Local Plan Review for Examination, initially setting out an employment land shortfall of 45 hectares. CCC subsequently post-submission submitted an Employment Land Recycling Paper and an Employment Windfall Paper as part of the Examination and concluded that by taking into account windfalls this would reduce the shortfall to 9.0ha over the Plan period. CCC's Local Plan Review is currently at Examination and the extent of employment land need and shortfall has been a discussion point and is the subject of additional hearing sessions.

What progress has been made, what agreements are there and what is currently unresolved?

Unmet housing needs - commissioning of a West Midlands Strategic Growth Study

For the GBBC HMA, there is evidence of a significant shortfall between housing requirements and land supply, but the overall scale of the shortfall has not been collectively quantified beyond 2031 since the GBBC HMA Strategic Growth Study (2018).

As such, and as recommended in the 2024 GBBC HMA Statement of Common Ground, the position with regards to unmet housing needs across both HMA is now being considered through a new West Midlands Strategic Growth Study. This Study is being undertaken by Arup consultants who have been commissioned by the West Midlands Combined Authority in partnership with the 14 authorities within the GBBC HMA and 6 authorities within the C&W HMA (note there is some overlap as both Stratford-on-Avon and North Warwickshire areas fall within both HMAs).

This study is due to report in summer 2026 and will identify the unmet housing need across the area and appraise a range of strategic-growth scenario options across the HMAs to enable future decision making by strategic and local planning authorities.

Given the timescales for the production of this Strategic Growth Study and the report not being available to inform the SWLP Publication (Regulation 19), it is currently not possible to identify whether any unmet housing needs arising from across the HMA

areas should be accommodated within either Stratford-on-Avon or Warwick Districts. As such the Publication (Regulation 19) SWLP does not provide for any unmet housing need from authorities within the two HMAs. Until there is greater certainty regarding the quantum of unmet needs and how this can best be distributed across the area, it is premature for the SWLP to allocate sites to meet any unmet need.

However, the Plan is testing through the Sustainability Appraisal a series of reasonable alternatives including the implications of providing a higher level of housing in the event that the position changes by the time the SWLP reaches examination.

In any event, and as with all Local Plans, there will need to be a review of the SWLP after 5 years and at such point the strategic position with regards to emerging Spatial Development Strategies will become much clearer as will the position with regards to unmet housing needs.

Unmet employment needs

The current evidence suggest that a number of authorities across the West Midlands area have an unmet employment need, through a combination of SoCG, recent Local Plan progress and examinations and new HEDNA evidence covering different areas, largely within the Black Country and Coventry City.

There is no clear evidence, however, with the exception of Coventry City Council, that either Stratford-on-Avon or Warwick District Councils are candidate authorities to meeting any of and currently identified unmet need arising from the HMA areas. It is the Councils assertion that any unmet need arising from the Black Country should be sought to be met within the Black Country FEMA and wider emerging SDS area in the first instance, and only if that is deemed to be not possible then for this to be considered in neighbouring authorities. The correspondence undertaken in spring 2026 as set out in Table 4 confirms that those authorities in closest geographical proximity to South Warwickshire do not anticipate having an unmet employment need.

The exception to this is Coventry City Council which has a potential unmet employment need. CCC, SDC and WDC entered into a Statement of Common Ground in February 2026 and whilst the South Warwickshire authorities acknowledged the potential need to accommodate growth arising from beyond South Warwickshire, concerns were raised around CCC's approach to protecting existing employment sites, HELAA assessments of sites and CCC's lack of exploration of Green Belt sites. The Coventry City Local Plan Review is currently under examination and is due to report later in 2026. Any change to the position on unmet employment needs between Coventry and the SWLP authorities will be dealt with through an updated Statement of Common Ground.

Ongoing dialogue with HMA authorities regarding unmet development needs

In spring 2026, officers from Stratford-on-Avon and Warwick District Councils wrote to all of the authorities within the two HMAs and FEMAs setting out the intended approach

to be taken in the SWLP Publication Stage as set out above and sought confirmation that authorities were satisfied with the approach being taken. A summary of the responses received are set out in Table 4.

The South Warwickshire authorities will continue to engage positively and proactively with relevant authorities across the HMAs and FEMAs as the SWLP plan-making process progresses on the matter of unmet development needs arising from outside of South Warwickshire and will be seeking to enter into SoCGs in the coming months as deemed appropriate.

Table 4: Responses from GBBC and C&W HMA authorities in Spring 2026 to approach being taken in the SWLP Publication (Regulation 19) stage with regards to meeting unmet needs

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|---|---|---|
| Greater Birmingham and Black Country HMA | | |
| Birmingham City Council | Agree that it is not possible to identify whether any unmet housing and employment needs should be accommodated within Stratford-on-Avon District. This is a pragmatic approach at this stage in plan making and the SDS's development. | |
| Bromsgrove District Council | The Council is comfortable with the approach being taken in the SWLP | The Council is comfortable with the approach being taken in the SWLP |
| Cannock Chase District Council | No response | No response |
| Dudley MBC | <p>Whilst the outcomes of the West Midlands Strategic Growth Study are still to be published, evidence has been published (via the GBBC HMA Statement of Common Ground, through Local Plans that have been submitted for Examination or currently at Examination or published for Regulation 18 consultation), which clearly demonstrates that a shortfall exists across the HMA.</p> <p>On this basis the testing of a series of reasonable alternatives for the SWLP would be welcomed and encouraged via the Sustainability Appraisal process, including the testing of a higher level of housing growth scenario in advance of the publication of the SGS and the ongoing work for the preparation of the West Midlands Spatial Development Strategy.</p> | |
| | | <p>As evidenced in the Black Country FEMA HMA Statement of Common Ground there is a large unmet need across the FEMA which has been established through the recent examinations of the Cannock Chase, Dudley and Sandwell Local Plans to date. Furthermore, the Regulation 18 consultations for both the Birmingham and Walsall Local Plans have demonstrated an employment land shortfall. A Housing & Economic Development Needs Assessment has been recently commissioned to inform the preparation of the West Midlands Spatial Development Strategy level. This work is likely to indicate that an employment land shortfall will exist across the HMA area, it is the Council's view that the SWLP should seek to address unmet employment needs.</p> |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|------------------------------------|---|---|
| Lichfield District Council | Agree it is pragmatic to test options for higher housing growth but need to explain rationale for what is tested. | Some Local Plan preparation is showing shortfalls – eg Birmingham preferred options 38ha, Wolverhampton submitted plan 83.5ha, Sandwell submitted plan 169ha – thus SWLP should test higher levels of employment need if consistent with FEMA areas. Lichfield have not concluded whether they can meet their own employment needs yet. |
| North Warwickshire Borough Council | No objection to, and recognise the need for the pragmatic approach being taken within the SWLP with regards to unmet housing and employment needs across the HMA. | |
| Redditch Borough Council | Comfortable with the approach taken at this stage, although as the new Redditch Local Plan progresses it maybe that the constrained nature of Redditch may require cross boundary cooperation as per previous plan making. | Comfortable with the approach taken at this stage, although as the new Redditch Local Plan progresses it maybe that the constrained nature of Redditch may require cross boundary cooperation as per previous plan making. |
| Sandwell MBC (Officer Response) | <p>Do not agree. Several authorities within the GBBC HMA have already identified a housing shortfall in their local plans, and this is a matter of ongoing strategic concern. While recognising the timing constraints associated with the West Midlands Strategic Growth Study, the decision not to plan for any unmet need at this stage risks creating further pressure across the HMA.</p> <p>Note that the Sustainability Appraisal is testing reasonable alternative growth options, including higher housing numbers and this is welcomed. However, if</p> | Satisfied with the approach to employment land. Note that no authorities have requested Stratford-on-Avon District to accommodate unmet employment needs, and agree that the SWLP does not need to make provision for this at present. |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|--|--|--|
| | <p>the SA identifies reasonable alternative sites capable of accommodating additional housing, clarification is requested on the process for allocating these after publication of the Regulation 19 Plan.</p> | |
| <p>Solihull MBC (Officer Response)</p> | <p>Agree that the approach suggested is pragmatic and see the basis and justification for this approach. Agree that this issue needs to be informed by a robust evidence base and likely tested through the SDS process which is at an early stage whilst the evidence base remains in development. The extension of the SGS [to include Coventry and Warwickshire] will help this, but is not the sole basis upon which such decisions will be made.</p> <p>Having regard to the national expectation for Plans to be adopted as soon as possible and the requirement for plans to be reviewed within 5 years of adoption, agree that a pragmatic approach would be to move forward positively now to meet locally derived needs but with an eye on longer term matters to be reviewed within the next Plan iteration – at which point there should be greater certainty around the SDS and its supporting evidence.</p> <p>From a Solihull perspective in particular, the Council is currently developing the Reg19 Local Plan with a view to submitting under the legacy system. The Council is looking at options to deliver its own</p> | <p>Confirmation that Solihull MBC would not be looking to export any need at this stage.</p> |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|---------------------------------------|---|--|
| | <p>local needs within the Borough within the initial plan period. In the context of the SDS this position may change longer term as part of a future Plan review, or if there was a diversion onto a new Plan under the new system.</p> | |
| <p>South Staffordshire Council</p> | <p>Acknowledge that there is some uncertainty in relation to unmet housing needs across the GBBC HMA, and that cross-boundary strategic planning is particularly challenging at this point in time, ahead of the introduction of Spatial Development Strategies (SDSs).</p> <p>However, early indications from the emerging update to the Strategic Growth Study, together with the submitted Local Plans for Wolverhampton, Sandwell and Dudley, suggest that there is likely to be an unmet housing need within the HMA at present. It is considered that the SWLP should make every reasonable effort to explore opportunities to contribute towards meeting unmet housing needs arising within the HMA, where sustainable and appropriate opportunities exist. Taking a proactive approach now will help to reduce the risk of unmet needs continuing to increase across the HMA over time.</p> | <p>No comments.</p> |
| <p>Tamworth Borough Council</p> | <p>No response.</p> | <p>No response.</p> |
| <p>Walsall MBC (Officer response)</p> | <p>Do not agree. There is clear evidence of unmet need in the GBBC HMA. This includes the various statements of common ground that have been published for recent local plan</p> | <p>A similar situation applies in respect of employment need. The EDNA 2024 update published to support the local plan examinations for Dudley and Sandwell is the</p> |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|--|---|---|
| | <p>examinations, including those for Dudley, Sandwell and Telford. The statements published so far relate to local plans and need calculated in accordance with previous versions of the NPPF and standard method.</p> <p>The latest standard method introduced with the December 2024 NPPF increases the housing need for almost all the authorities in the region. It is assumed that the SWLP will be prepared in accordance with this latest method.</p> <p>Whilst South Warwickshire may not represent a sustainable location to accommodate housing need arising from Walsall, this should be tested through the plan rather than being dismissed as an option.</p> | <p>most recent evidence of need for the Black Country.</p> |
| <p>Wolverhampton City Council (Officer response)</p> | <p>There is an acknowledged housing shortfall across the GBBCHMA, evidenced in the March 2025 Statement of Common Ground.</p> <p>The Strategic Growth Study is underway, and whilst this work is not completed, it is likely that a significant housing shortfall will persist and that assistance from neighbouring authorities will be required.</p> <p>The proposed approach of potentially deferring wider housing need for consideration through the Examination process and having regard to the recommendations of the Strategic Growth Study is not considered sound in terms of the NPPF Duty to Cooperate and soundness tests. Instead, the Plan</p> | <p>The Black Country FEMA HMA Statement of Common Ground confirmed that there is a large unmet need across the FEMA which has been established through the recent examinations of the Cannock Chase, Dudley and Sandwell Local Plans to date. Furthermore, the Regulation 18 consultations for both the Birmingham and Walsall Local Plans have demonstrated an employment land shortfall.</p> <p>A Housing & Economic Development Needs Assessment has been recently commissioned to inform the preparation of the West Midlands Spatial</p> |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|--|---|---|
| | <p>should explore the potential to contribute to unmet housing need in the GBBCHMA by testing a proportionate contribution based on an assessment of the suitability and deliverability of all sources of housing supply, including green belt land, which is informed by work on the GBBCHMA Strategic Growth Study.</p> <p>The Plan should also include a policy requiring the Plan to be updated immediately following adoption of the West Midlands SDS and the SDS within which the Plan area is located, which will establish a housing target for the area over the longer term. This will ensure that sufficient land is released for housing as early as possible, both to meet local housing need, and to contribute towards identified housing shortfalls arising in neighbouring authorities.</p> | <p>Development Strategy level. This work is likely to indicate that an employment land shortfall will exist across the HMA area, it is the Council's view that the SWLP should seek to address unmet employment needs.</p> <p>Furthermore, the West Midlands Strategic Employment Sites Study identified potential opportunities within the Plan area for further testing through the Local Plan process to meet the identified shortfall of large, high quality and well-located sites. This should be addressed through the employment evidence update referred to in the consultation, and the draft Plan to be published later this year.</p> |
| Coventry & Warwickshire HMA | | |
| Coventry City Council | Informal reply ahead of formal response seeking some clarification, albeit the clarification relates to employment land. | Clarification sought relating to employment land in order to respond fully. Further clarification will be provided by the South Warwickshire authorities. |
| Rugby Borough Council | RBC is satisfied with the approach being taken in respect of housing need. | Highlights that RBC propose 2.5ha of employment land to contribute to identified unmet need in Coventry's emerging local plan. Clarification sought on whether the SWLP will address any of Coventry's unmet need before able to fully respond. |

| Authority | Response with regards to position on unmet housing needs | Response with regards to position on unmet employment needs |
|---------------------------------------|--|--|
| | | <p>In the event that the ongoing examination of Coventry's plan finds that there is unmet need beyond that currently identified (9ha), constructive ongoing dialogue between authorities in the FEMA should occur in line with paragraph 3.9 of the agreed SoCG between RBC and the South Warwickshire authorities.</p> <p>Further clarification will be provided by the South Warwickshire authorities.</p> |
| Nuneaton and Bedworth Borough Council | NBBC agrees with the approach set out by the SWLP authorities in respect of addressing unmet housing needs within the HMA. | <p>Note the ongoing examination of Coventry's Local Plan. The level of any unmet employment need is currently under consideration and will ultimately depend on the Inspector's findings.</p> <p>Should an additional unmet need be identified and dependent on timings, neighbouring authorities, including the South Warwickshire authorities through the SWLP, may be asked to consider whether they are able to assist in meeting that need.</p> |
| North Warwickshire Borough Council | No response. | No response. |

Other neighbouring authorities

Stratford-on-Avon District Council also sought the views of its other neighbouring authorities which it doesn't share either a functional housing or employment market area, the responses are set out in Table 5.

Table 5: Responses from other Stratford-on-Avon neighbouring authorities in spring 2026 to approach being taken in the SWLP Publication (Regulation 19) stage with regards to meeting unmet needs

| Authority | Response with regards to position on unmet housing and employment needs |
|-----------------------------------|---|
| Cherwell District Council | The District Council can meet its own housing and employment needs |
| Cotswold District Council | <p>Cotswold District Council is satisfied with the approach being taken within the SWLP in relation to unmet housing and employment needs at this stage.</p> <p>Emerging position is that Cotswold may just be able to accommodate its own needs within the Local Plan area. On that basis, and subject to further evidence, Cotswold District Council is not seeking assistance from Stratford-on-Avon District Council to accommodate any unmet housing or employment need.</p> <p>However, this position is not yet final as further evidence is awaited. The Regulation 19 consultation is currently anticipated to commence in mid-August 2026. Should circumstances change ahead of that stage, the Council would of course engage constructively with neighbouring authorities through the Duty to Cooperate.</p> <p>In that context, we are content with the pragmatic approach being taken through the SWLP, and we note that Stratford-on-Avon is not seeking support from Cotswold to meet any unmet housing or employment needs. This is an important consideration for us, not least given that our housing requirement has risen significantly to around 1,055 dwellings per annum (more than double the level assumed previously) which presents a very real delivery challenge locally.</p> |
| West Northamptonshire Council | <p>The position set out in relation to unmet housing or employment need is also noted.</p> <p>West Northamptonshire Council is not requesting any help in respect of this at this current time.</p> |
| West Oxfordshire District Council | No response |
| Wychavon District Council | South Worcestershire Councils (Wychavon, Malvern Hills and Worcester City) will be meeting its own identified housing and employment needs within its boundaries as part of the new Local Plan. |

B. Gypsy and Traveller needs

In spring 2026 the South Warwickshire Councils wrote to relevant Local Authorities including those within both the Greater Birmingham and Coventry & Warwickshire HMAs, along with other neighbouring authorities to request assistance with meeting Gypsy and Traveller requirements. To date, no authorities have indicated that they are in a position to be able to assist in meeting the South Warwickshire need.

C. Transport planning

Warwickshire County Council – Highways.

A series of meetings have occurred with Warwickshire County Council (WCC) and their transport consultants SLR Consulting following the Preferred Options consultation. This work has informed the preparation of the Strategic Transport Assessment. The main focus of this work has been demonstrating safe access for strategic sites, and setting out the mitigation required to prevent worsening conditions on the Strategic Road Network through transport modelling. A range of broad and site-specific mitigation schemes have been provided which form part of the Infrastructure Delivery Plan which supports the South Warwickshire Local Plan. Future planning applications prepared by the developers of site allocations will be expected to refer to its infrastructure requirements when preparing future planning applications. It is understood that the access assumptions provided by the WCC Highways team reflect what is required to allow modelling to occur in a safe fashion.

It has been recognised that WCC Highways have raised some concerns about the strategic sites proposed in the South Warwickshire Local Plan. Likewise, SWLP Officers have raised concerns regarding the access arrangements proposed by WCC/SLR, reflecting comments made by developers and site promoters. It is expected that outstanding matters of disagreement regarding site access can be resolved through further work, such as via the preparation of Statements of Common Ground between specific promoters and WCC Highways as applicable. Regular bi-monthly meetings of the SWLP Highway Working Group have been taking place between Regulation 18 and 19, with representatives of the South Warwickshire Councils, SLR, WCC and National Highways attending to discuss and resolve matters as applicable.

Warwickshire County Council are also providing a range of public and active travel commitments as part of the work that they are undertaking in support of the Strategic Transport Assessment which will be fed into the IDP.

National Highways

Several meetings have occurred with National Highways following the Preferred Options consultation, especially in early 2026, as the growth strategy became defined. This has occurred through the SWLP Highways Working Group. National Highways have provided feedback on the modelling scope and methodology used at Preferred Options, including detailed feedback regarding the South Warwickshire Local Plan Study Phase 1 which set out the proposed approach to the transport modelling analysis to support the assessment of potential effects on the highway network, and formed the basis of the methodology for the Strategic Transport Assessment (STA) which supports the preferred options consultation. There were initial concerns raised regarding the lack of defined impacts on the SRN identified as part of the Phase 1

Study. Specifically, five points were raised as evidence requirements for the STA:

- SRN Link and junction modelling, including but not limited to M40 Junctions 12-15, the A46 at Leek Wotton, Thickthorn, Stoneleigh, Festival Island and Walsgrave. Interfaces with the M42, M6 and M5 interfaces where relevant.
- Assignment-based modelling to understand network reassignment under congestion.
- Freight distribution modelling, aligned to the high proportion of B8 uses assumed.
- Integration with WCC's microsimulation models, where applicable.
- Assessment of access deliverability where spatial options may require improvements at SRN junctions.

This advice was provided to SLR who responded and updated their scope of works accordingly. Whilst it was accepted that some of these points have not been addressed ahead of Reg-19, it is anticipated that this will be dealt with ahead of submission. This approach has been agreed with National Highways. WCC and the South Warwickshire Councils continued to engage National Highways through the bi-monthly SWLP Highways Working Group and have addressed issues as they arise, this included sessions that were held with their modelling team. National Highways have verbally stated their support in principle for the proposals included in the STA, particularly noting their support for the proposed new junction to replace junctions 13/14 of the M40. It is expected that the position of National Highways relative to the Local Plan will be confirmed through a future Statement of Common Ground, and in their response

to the Regulation-19 consultation, given the active engagement that has occurred throughout the preparation of the South Warwickshire Local Plan.

Rail

An initial meeting was held with Network Rail and the West Midlands Rail Executive (WMRE) in March 2025, following the Preferred Options consultation. In May 2025, the WMRE confirmed their initial position regarding the SWLP, endorsing the position of WCC regarding new settlements. They also confirmed that it was unlikely given the latest industry costs, that there would be a positive business case for a new local station south of Royal Leamington Spa.

Following further refinement of the spatial development strategy, the revised list of sites was circulated with the WMRE and Midlands Connect, setting out implications arising from Strategic Growth Locations. Midlands Connect responded in May 2025, which set out issues around double tracking the railway to connect to the multi-modal transport hub at SG01 (now COV.1): South of Coventry. The double tracking is likely to occur in two phases, firstly between Leamington Spa and Kenilworth, and then between Kenilworth and Coventry which would require third party land. The WMRE also provided an update on their position in May 2025. They noted that Site B1 (now HAT.1): Hatton had good opportunities for service enhancements as part of the Local Plan. They noted that an enhanced service from Hatton Station would require additional infrastructure provision, namely:

- Deliver reinstatement of Birmingham Snow Hill Platform 4 as part of Midlands Rail Hub project.
- Provide new track crossover at Royal Leamington Spa station to allow services from the Warwick direction to terminate in Platform 1 without requiring an inefficient shunt move.
- Provide new track crossover at Kidderminster station, allowing services from Birmingham to terminate without an inefficient shunt move.

These infrastructure enhancements would allow a restructuring of services on the Snow Hill lines to allow improved services to be delivered at Hatton and Warwick Parkway as part of the Midlands Rail Hub project. The WMRE consider that the significant amount of housing will assist in the strategic case for the investment, and this would assist in securing wider funding. However, they still anticipate that wider funding is needed to deliver these changes.

The WMRE confirmed their view, having had discussions with Midlands connect, that the case for double tracking the railway between Coventry and Leamington was likely to cost between £100m-200m depending on the amount of

infrastructure provided. It is considered low in likelihood that this project will commence in the short to medium term, as any business case would be challenging given the existing bus service provision between Central Coventry, Coventry and University of Warwick. The expected cost for reinstating the Stratford-Honeybourne Line is <£500 million, and that is without consideration of the wider implications for the North Cotswold Line. A comparable scheme for reinstating 21 miles from Bicester to Bletchley (roughly twice the length), cost £1.3 billion and acts as a benchmark.

The South Warwickshire Council's will continue to engage with partners throughout the plan period to progress these schemes, to deliver sustainable rail options to future residents but recognise that there are challenges in securing provision.

D. Engagement with key infrastructure providers

- Education

Warwickshire County Council – Education

The South Warwickshire Councils have conducted meetings with Warwickshire County Council Strategic Planning Team, individually and collectively to understand what the implications of the emerging spatial growth strategy are for education provision. This is an evolving situation that has shifted throughout the preparation of the preferred strategy.

Engagement with WCC has indicated that a development of between 1,500 and 2,000 new dwellings would require a new primary school. WCC have also identified where they consider that Local Growth Locations would collectively require additional primary school provision either through the expansion of existing facilities or through the provision of a new primary school to serve a particular settlement. WCC has also indicated that a development of 6,000 dwellings would require a new secondary school, however further discussions has indicated that 4,000 dwellings could also be an appropriate trigger for a new secondary school.

Regarding primary schools, it is generally accepted that most strategic growth locations and new settlements have capacity to provide a primary school if required, and these have typically formed part of standard offer from site promoters. For Local Growth Locations, where land has not been identified, currently there is a broader expectation that situation will have to be resolved in the plan period, through the identification of land or expansion of existing facilities. Joint working between promoters will be encouraged to deliver primary education as required.

Regarding secondary education, where possible, WCC Guidance has been followed, to allow for education solutions. Many site promoters have indicated their willingness to provide secondary schools for lower capacities, and these

have been accounted for when preparing the spatial development strategy. There are some exceptions to this where matters are outstanding, for example the need for a further education solution for the north of Leamington Spa and resolving the potential need for a further secondary school solution to the south of Leamington Spa. Despite reductions in site capacity through the refinement process, development proposals at Southam are still expected to deliver a secondary school, and the development south of Stratford-upon-Avon provides a solution to the shortage of places seen in the town at Stratford-upon-Avon School.

As with the transport working group, it is expected that engagement with the County will continue this matter, through to examination, given the fluidity of the situation regarding education provision.

- **Healthcare providers**

The Coventry and Warwickshire Integrated Care Board (ICB) provided feedback to the spatial growth scenario as it was refined, providing comments regarding requirements at each SGL and New Settlement. They didn't provide a view at this stage as to whether a development proposal would be supported by the ICB or not. However, it set out whether infrastructure would be required due to the population yield from a development proposal relative to the amount of capacity at local facilities. This typically defined whether a health hub would be required as part of development proposals. No further feedback has been received regarding the growth scenario from the South Warwickshire University NHS Foundation Trust (SWFT); however, it is understood their position remains that the expansion and intensification of existing facilities is preferred over new facilities.

- **Power**

The South Warwickshire Councils have engaged with the National Grid to understand how the demand generated by growth proposed will impact upon its infrastructure. The National Grid does not advise on capacity to accommodate development proposed in the future but instead focuses on ensuring that the network is development ready. This means the National Grid are more focused on existing commitments rather than considering emerging allocations when it comes to considering demand relative to generation. It is recognised that the South Warwickshire economy is rapidly decarbonising, with annual electricity demand expected to double in the period to 2050. Engagement with the National Grid and National Energy Systems Operator will continue throughout the plan-period to understand the strategic implications of the ongoing changes to the energy mix at a regional and national level.

E. Environmental planning

Key partners that have been engaged with since the Preferred Options consultation include Warwickshire County Council (WCC) Flood Risk

Management Teams, Ecology Teams and Landscape Teams. Natural England have also been engaged with and draft policies shared for comment. Numerous stakeholders have also been engaged through the evidence base preparation process, with consultants holding workshops to ensure studies are well informed by local/specialist knowledge. Discussions have focused on creating environmental policies that will obtain the best outcome for nature and the wider environment, and how to implement them.

WCC Flood Risk Management have been heavily involved in the formation of the water and flood risk policies to ensure that the best standards and best practice has been embedded into the policies. WCC Landscaping teams have been involved in the evidence gathering process, having been central to agreeing the methodology and criteria used in the Special Landscape Area and Areas of Restraint reviews, and have been engaged through policy formation. WCC Ecology teams have been heavily engaged in the formulation of the policies, particularly with regard to the approach to Environmental Net Gain within the plan.

F. Flooding and Water Management

In the preparation of the Publication (Regulation 19) SWLP a level 2 Strategic Flood Risk Assessment (SFRA) was required in order to provide a detailed level of assessment on specific site proposals. Key stakeholders were involved in the production of the Study. This engagement on the SFRA methodology helps to reduce the risk of comments on the methodology being raised during the statutory reviews.

The main stakeholders for the SFRA are the Environment Agency, Warwickshire County Council as Lead Local Flood Authority (LLFA), Severn Trent Water, the Canal and River Trust and neighbouring authorities.

The evidence has been used to inform site selection and scope for mitigation within the Publication (Regulation 19) SWLP. No issues remain unresolved.

Severn Trent

The South Warwickshire Councils have engaged in the preparation of the emerging Regional Drainage and Wastewater Management Plan, which is being prepared by Severn Trent. Through the Water Capacity Study, the South Warwickshire Councils have confirmed that the following infrastructure improvements are required for different Asset Management Periods (AMP):

- Three Wastewater Treatment Works (WwTW) are current close to or exceeding their permit limit (Bidford-on-Avon, Napton and Wellesbourne WwTW).

- By the end of AMP8 (2030) Shipston Fell Mill is likely to be exceeding its permit.
- By the end of AMP9 (2035) Minworth, Itchen Bank, Lighthorne, and Warwick Longbridge would also be close to or exceeding their permit limit.
- By the end of AMP10 (2040) Stratford Milcote is added.
- By the end of AMP11 (2045) Rowington is added.
- By the end of AMP12 (2050) Gaydon is added.

It is accepted that the growth delivered by the SWLP will require the provision of improved capacity as part of the infrastructure package that is delivered, through alignment with the funding cycles of Severn Trent Water, and so engagement will continue to occur to ensure that strategic investment strategies are aligned with the phasing of development.

G. Site Delivery

Engagement with key delivery partners has been ongoing, notably on strategic sites and in the delivery of infrastructure, in the preparation of the Publication (Regulation 19) SWLP. This will continue to develop as the Local Plan process progresses, and it is anticipated that the Councils will seek developers of significant sites to enter into Statements of Common Ground with the Councils.

Of particular note is the engagement to date on the below sites:

Long Marston Airfield New Community

Stratford-on-Avon District Council has been working with Homes England for a number of years to help bring the site forward, since its inclusion within the current adopted Core Strategy. The District Council was awarded £13.4 million in February 2018 from the government's Housing Infrastructure Fund which was used to address contamination and infrastructure costs associated with the development of the first 400 homes on site.

Ongoing discussions have been had with a wide range of partners, including Homes England, the West Midlands Combined Authority, Warwickshire County Council and land promoters in consideration of extending the allocation to a scheme of 10,000 homes and the significant scale of infrastructure that will be required to support such a scale of development, including a bypass of Stratford-upon-Avon. This engagement will continue as the Local Plan preparation progresses with the intention to create a Public-Private Joint Venture Partnership to bring the new settlement forward in a co-ordinated manner.

North of Kenilworth/South of Coventry area

Specific engagement has taken place on matters relating to the north of Kenilworth/south of Coventry area. Following [Cabinet approval in April 2022](#), Warwick District Council has been working in partnership with Coventry City Council, Warwickshire County Council and the University of Warwick to develop a masterplan framework for the north of Kenilworth/south of Coventry (NoKSoC) area. In recognition of the scale of committed development and future growth pressures affecting the area, the organisations committed to joint working to understand the opportunities and challenges associated with future growth. A key ambition was to address how improvements and linkages (particularly those relating to transport) could be secured and how more robust business cases for projects and proposals could be delivered. A key focus has been strategic opportunities to address highway capacity constraints and to improve public transport and active travel provision within the area.

A NoKSoC Project Board was set up with senior officers or representatives attending from each organisation and the Board has met broadly on a quarterly basis. The organisations have contributed financially to progress technical work and the discussions have helped inform the growth proposals for the area and policies COV.1 (South of Coventry), COV.2 (Stoneleigh Employment Group), COV.3 (Coventry Airport) and MIS.E (University of Warwick Campus).

Hatton New Community

The promoters of the Hatton New Community site have been transparent about their intentions to try and bring the site forward through the SWLP and have been proactive over an extended period of time in engaging with the local community including parish councils, locally elected politicians and a group set up to preserve the local area, Keep Hatton Station Rural. The promoters have engaged with a variety of bodies as well as the South Warwickshire Councils such as Warwickshire County Councils, Canal & River Trust and West Midlands Rail Executive in working up their proposals.

6. Conclusions and Next Steps

Conclusions

This Statement of Compliance summarises the position reached in regard to maintaining effective co-operation as at the Publication (Regulation 19) Stage of the SWLP on cross-boundary strategic matters, and the outcomes that have been achieved through this co-operation.

The South Warwickshire Councils consider that the engagement on strategic cross-boundary issues throughout the plan making process to date fulfils the policy requirement to maintain effective co-operation and that the discussions have been demonstrably constructive.

The issue with regards to addressing the unmet employment needs of Coventry City remains an unresolved and ongoing strategic, cross-boundary issue. The Coventry City Local Plan Review is currently under examination and is due to report later in 2026. It is acknowledged that the Inspector has published a note, IN13, of action points following the week 1, 2 and 3 hearing sessions of the Examination. Within this note, the Inspector concludes that it would not be appropriate to modify the Coventry Local Plan to include an employment land windfall allowance and considers other matters relating to employment land including asking the Council to modify their Plan to include an omission site in the Green Belt. The note would suggest that Coventry's unmet employment need may be higher than the 9ha initially envisaged by the Council although it remains uncertain ultimately what level of unmet need there may be. Any change to the position on unmet employment needs between Coventry and the SWLP authorities will be dealt with through an updated Statement of Common Ground. The level of employment provision allocated within the Publication (Regulation 19) SWLP allows for a surplus 11.85% (27.7ha) of non-strategic employment land against the 233.7ha requirement. This provides a level of contingency for the South Warwickshire authorities against a proportion of non-delivery but some of this contingency may also be able to be utilised to meet an element of Coventry City's unmet employment need once this is confirmed.

Next Steps

Following the public consultation on the Publication (Regulation 19) SWLP, the South Warwickshire Councils intend to move forward with the production of additional Statements of Common Ground (SoCG) with neighbouring authorities and key partners as deemed appropriate. These SoCG will formally confirm the collaboration that has been undertaken to resolve strategic issues and identify any outstanding issues.

An updated version of this Compliance Statement will be produced as the process progresses to summarise the ongoing dialogue and engagement that occurs after the Regulation 19 stage.