

South Warwickshire Local Plan Publication Version

Growth Strategy Topic Paper

June 2026

Stratford-on-Avon District Council
Warwick District Council

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1 Introduction

This growth strategy topic paper provides further details on how the growth strategy contained within the South Warwickshire Local Plan (SWLP) has been developed. The growth strategy is also referred to as the spatial development strategy, and the terms are used interchangeably for the purposes of the South Warwickshire Local Plan. This paper contains three core elements: firstly, it sets out how the growth strategy meets the housing and employment targets required for the SWLP; secondly, it provides a review of the development of the spatial development strategy to date, updating the position to account for progress since the preferred options consultation in 2025; and finally, it provides a detailed review of the site selection methodology for strategic and non-strategic sites which is supported by a set of annexes to this paper.

The SWLP sets out a spatial growth strategy for the period 2025-2050, making provision for a minimum of 54,925 additional homes alongside 623.6¹ hectares of allocated employment land to meet local and strategic needs. The strategy, known as “Sustainable Travel and Economy” directs growth towards existing built-up areas and sustainable locations, prioritising previously developed land in the first instance. Where greenfield land is required, providing development through larger strategic parcels, including new settlements, capable of delivering the infrastructure necessary to support sustainable communities has been favoured. This approach reflects the requirements of the National Planning Policy Framework (NPPF). In particular, its emphasis on boosting housing supply, supporting economic growth and making effective use of land.

This topic paper should be read in conjunction with the publication version of the South Warwickshire Local Plan, the Infrastructure Delivery Plan (IDP), and the associated Sustainability Appraisal (SA). Further details of the preparation of the spatial growth strategy can be found in the supporting evidence of previous consultations on the preparation of the SWLP.

1.1 Structure of this Document

The structure of the remainder of this document is as follows:

- Chapter 2 sets out the housing and employment requirements for the South Warwickshire Local Plan that the spatial growth strategy is expected to meet.
- Chapter 3 sets out how the overarching principles that have informed the spatial growth strategy prepared for previous consultation stages of the SWLP, and how this developed over the plan-making period up to the preferred options consultation.
- Chapter 4 provides a brief overview of various components of the wider evidence base supporting the publication document.
- Chapter 5 sets out how engagement with ward members, stakeholders, residents and business, site promoters and neighbouring Local Planning Authorities has informed the development of the spatial growth strategy.
- Chapter 6 sets out the publication version of the Spatial Growth Strategy, and how it has been refined following the preferred options consultation and the receipt of evidence.

¹ Note, this excludes 205.1ha of retained strategic employment allocations in Warwick District on the edge of Coventry.

- Chapter 7 sets out conclusions and next steps for delivering the spatial growth strategy.

1.2 National Policy Context

This sub-section sets out the national planning policy context, and the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) for plan-making. These requirements have informed the development of the spatial growth strategy, and the site selection process.

National Planning Policy Framework²

The National Planning Policy Framework was first published in March 2012. The latest update to the NPPF occurred in December 2024. The NPPF acts as a key piece of national policy for planning purposes. In late 2025/early 2026, the Government consulted on a revised version of the NPPF that will lead to a substantial shift in the plan-making process, most notably through the creation of spatial development strategies and national development management policies.

Notwithstanding this, it is expected that the SWLP will be examined against NPPF 2024 provided it is submitted ahead of the deadline set for the “legacy plan making system”³ allowing it to be adopted under the Planning and Compulsory Purchase Act 2004, excluding the amendments made by the Levelling-up and Regeneration Act 2023 of 31st December 2026.

The NPPF sets out that the purpose of the planning system is contribute towards sustainable development through the provision of homes, commercial development and supporting infrastructure. Paragraph 8 of the NPPF sets out how the planning system has three overarching objectives:

- a) An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
- b) A social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- c) An environmental objective - to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 11 of the NPPF applies a presumption in favour for sustainable making which for plan-making means that:

² Ministry of Housing Communities and Local Government (2024). National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf.

Accessed:21/05/2026

³ Ministry of Housing, Communities and Local Government.(2025). Create or update a local plan using the legacy system. Available at: <https://www.gov.uk/government/collections/create-or-update-a-local-plan-using-the-legacy-system>. (Accessed: 05.03.2026)

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 20 sets out how strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes, employment, retail, leisure and other commercial development.

Paragraph 23 states that strategic policies should provide a clear strategy for bring sufficient land forward to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This includes planning for and allocating sufficient sites to deliver the strategic priorities of the area. (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non- strategic policies)

Paragraph 61 confirms the Government’s objective to significantly boost the supply of homes. Paragraph 62 states that the to determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.

Paragraph 69 of the NPPF makes clear that strategic policy-making authorities should establish a housing requirement for their whole area, which shows the extent to which their identified housing need can be met over the plan period. The requirement may be higher than the identified housing need if for example it includes provision for neighbour area or reflect growth ambitions linked to economic development. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development and any relevant allocations.

Paragraph 72 of the NPPF requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

Paragraph 73 of the NPPF recognises that small and medium sized sites can make an important contribution to meet the housing requirement of an area, are essential for Small and Medium Enterprise housebuilder to delivery new homes and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

Paragraph 77 of the NPPF recognises that the supply of a large number of new homes can often best be achieved through planning for larger scale development such as new settlements or significant extensions to existing villages and towns. This is provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

Paragraph 83 notes that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for village to growth and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

Paragraph 85 requires planning policies to create conditions in which business can invest, expand and adapt to allow an area to build on its strengths, counter any weaknesses and address the challenges of the future.

Taken as whole, the NPPF provides a clear set of criteria for Local Planning Authorities when preparing local plans. It is a clear requirement for local plans to deliver a sustainable distribution for growth, accounting for the future needs of their communities.

Paragraph 123 of the NPPF requires planning policies to promote the effective use of land in meeting the need for homes and other uses, which safeguarding and improving the environment and ensure safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs in way that makes as much use as possible of previously developed or “brownfield land”.

National Planning Practice Guidance⁴

In 2025, following a judgement by the Court of Appeal⁵, it has now been established that the National Planning Practice Guidance (PPG) has the same legal status as the NPPF, and that no legal distinction exists between them. Both are statements of national policy by the Secretary of State, in line with their role as minister with overall responsibility for the planning system. This corrects a commonly held view that the PPG acts as a secondary consideration in a hierarchy of national planning policy.

⁴ [Planning practice guidance - GOV.UK](https://www.gov.uk/guidance/planning-practice-guidance)

⁵ *Mead Realisations Ltd v Secretary of State for Housing, Communities and Local Government* [2025] EWCA Civ 32

Paragraph 034 (Reference ID: 61-034-20190315) states that authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these and then set out a preferred approach.

Paragraph: 059 (Reference ID: 61-059-20190315) states that a plan is an opportunity for a strategic policy-making to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought forward.

Paragraph: 002 (Reference ID: 2a-002-20241212) confirms the requirement for strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for.

Paragraph: (040 Reference ID: 2a-040-2024121) sets out how the standard method informs the housing requirement. Once the housing need has been established, authorities should make an assessment of the new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters. It reiterates the NPPF, in that housing requirements may be higher than identified housing need. Local Planning Authorities should consider the merits of higher growth, and this should not normally have to be thoroughly justified at examination.

National policy therefore sets a clear housing requirement for local planning authorities to deliver. These requirements are frequently ambitious, and result in figures that require difficult decisions regarding the location of development, to ensure that there is a sufficient supply of homes in a local area.

1.3 Local Policy Context

The South Warwickshire Local Plan is a joint plan that is being prepared by both Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC). As such, it provides a strategic vision for both areas, determining where new development will be located for both Local Planning Authorities in the period to 2050. South Warwickshire covers 488 square miles, and includes highly rural areas, including land within the Cotswold National Landscape and designated Green Belt to the north of the districts, and urban areas, most notably the Warwick/Leamington/Whitnash conurbation which had a combined population of 96,905 residents at the 2021 census⁶.

Notably, at the present time, neither authority can demonstrate a five-year housing land supply and so both districts are seeing a great deal of speculative planning applications which are placing increasing pressure on public services and infrastructure. A principal factor in the preparation of the South Warwickshire Local Plan has been the recognition that although it will have to deliver substantial growth to provide enough housing to meet the full Local Housing

⁶ Warwickshire County Council (2024). Warwickshire Local Cycling and Waling Infrastructure Plan. Part 2: Warwick District. Available at: <https://democracy.warwickshire.gov.uk/documents/s35375/Appendix%208%20for%20Warwickshire%20LCWIP%20Part%202%20Warwick%20District.pdf>. (Accessed: 05.03.2026)

Need identified by the standard method, this is considered to be better than housing coming forward in an unplanned way as is currently being experienced. Accommodating development solely by utilising and expanding existing infrastructure, is in the main, no longer a realistic option given both the scale of growth required and the fact that a range of infrastructure providers have advised of significant capacity concerns and challenges across South Warwickshire, including healthcare, wastewater, education and transport.

An overarching starting point for the development of the growth strategy for the SWLP has been consideration of the existing approaches of the Councils.

WDC adopted the Warwick Local Plan 2011-2028⁷ (WLP) in September 2017. WLP Policy DS4: Spatial Strategy focuses growth within and adjacent to built-up areas, with most of the growth focused on the main urban areas of Warwick, Leamington, Whitnash and Kenilworth, and on the southern edge of Coventry. Notable strategic allocations include WLP Policy H43 (DS20) Kings Hill, which is a substantial urban extension to the south of Coventry with an overall capacity of up to 4,000 dwellings. Elsewhere development is focused to the south of Leamington at WLP Policy H01: Land West of Europa Way, which was allocated for 1,210 dwellings, WLP Policy H46: Gallows Hill and the Asps which allocated 1,530 dwellings, and a range of sites at the edge of Kenilworth. The urban areas of Warwick District remain some of the most sustainable locations in South Warwickshire to locate housing growth and are areas that are identified as where people want to live. Notably, land adjacent to these areas are also often designated as Green Belt, creating an inherent tension in terms of housing delivery.

WLP Policy H1 sets out where housing will be permitted. In addition to within urban areas, and at allocations, development is also permissible with the boundaries of Growth Villages and Limited Infill Villages as identified by the Settlement Hierarchy Report 2014. WLP Policy H1(d) also recognises that development in open countryside will be permitted provided it is adjacent to the boundary of an urban area or growth village, there is a need for the development such as due to the absence of a five year housing land supply, and the proposal is of small scale that will not have a negative impact on the character of the settlement.

The Growth Villages in the WLP are:

- Baginton
- Barford
- Bishop's Tachbrook
- Burton Green
- Cubbington
- Hampton Magna
- Hatton Park
- Kingswood
- Leek Wootton
- Radford Semele

⁷ [Local Plan - Warwick District Council](#).

SDC adopted the Stratford-on-Avon Core Strategy 2011-2016 (SCS) in July 2016⁸. SCS Policy CS.15: Distribution of Development provides the spatial strategy for the district. The approach used by SDC is one of balanced dispersal. This approach reflects the district's rural character by distributing growth across a wide range of settlements to maintain their vitality. While the focus for development remains Stratford-upon-Avon (Policy AS.1), a significant proportion of growth is directed towards the eight Main Rural Centres, which are identified as sustainable locations for growth. These are:

- Alcester
- Bidford-on-Avon
- Henley-in-Arden
- Kineton
- Shipston-on-Stour
- Southam
- Studley
- Wellesbourne

To ensure these existing settlements are not over-developed, the strategy identifies two New Settlements to deliver large-scale growth: SCS Proposal GLH: Gaydon/Lighthorne Heath and SCS Proposal LMA: Long Marston Airfield. Notably, delivery at Long Marston Airfield has been impacted by infrastructure constraints within the Local Road Network (LRN) to the south of Stratford-upon-Avon. Addressing these capacity issues is a central objective of the emerging South Warwickshire Local Plan (SWLP) Growth Strategy and has significantly informed the strategic site selection process.

SDC Policy CS.16 further supports this dispersal by apportioning growth to a wide range of Local Service Villages (LSVs). In a similar vein to WLP Policy H1(d), housing delivery is permissible based on the scale and sustainability of the settlement. However, the SCS identifies considerably more potential locations for housing growth than the Warwick Local Plan, categorised into four distinct tiers, while seeking to ensure the scale of individual proposals is strictly controlled to protect rural character.

Collectively, these local plans both respond to housing requirements that were informed by Objectively Assessed Needs from the mid-2010s. These were informed by a Joint Strategic Housing Market Assessment for the Coventry and Warwickshire Region. The SCS set SDC a requirement of at least 14,600 dwellings (730 dwellings per annum) over the period 2011-2031. Warwick District, meanwhile, had a requirement of 16,776 dwellings (932 dwellings per annum), over the period 2011-2029, a figure which includes a significant apportionment of Coventry's unmet housing need through the Duty to Co-operate.

Since the adoption of both these plans, housing targets have increased due to the introduction of the revised standard method for calculating housing need in national policy, necessitating a greater emphasis on strategic scale growth. Additionally, a key piece of feedback received from Ward Members through the plan-making process was that the relatively 'dispersed' spatial strategies of the current local plans had led to issues in terms of infrastructure provision and

⁸ Stratford-on-Avon District Council (2016) Stratford-on-Avon District Core Strategy 2011-2031. Available at: <https://www.stratford.gov.uk/planning-building/core-strategy.cfm>

strain on existing services. This has resulted in a clear preference for growth in fewer larger locations, where infrastructure delivery can be more effectively co-ordinated and secured.

As such, notwithstanding the dispersed settlement pattern of South Warwickshire, it cannot reasonably be said that the SWLP represents a strategy of dispersal. Under the current local plans, a degree of growth is expected in approximately 49 locations. In contrast, the SWLP expects strategic growth in just 21⁹ locations.

1.4 Preparation of the SWLP

The SWLP has been under preparation since May 2021, when the initial scoping consultation document was published. The Issues and Options consultation occurred in January-March 2023, with Preferred Options occurring in January-March 2025. This time period has seen three revisions to the NPPF in July 2021, December 2023 and December 2024, with a further update under consultation in late 2025 -early 2026. Due to this, there have been changes in national policy around growth requirements that have been responded too through the plan-making process.

When work commenced on the SWLP, the intention was to prepare a “Part 1” plan that would only address the strategic planning issues facing South Warwickshire. With the changes to the national planning system, including a desire for single local plans, alongside the absence of a Spatial Development Strategy for the Warwickshire area, the SWLP is being progressed as a full Local Plan; in essence a Part 1 and a Part 2 Local Plan. It does, therefore, include detailed policies that were not originally envisaged to be included.

⁹ 21 locations consisting of 1 New Settlement, 7 locations for Strategic Growth 13 locations for Local Growth

2 Meeting South Warwickshire’s Growth Requirements

The spatial growth strategy will accommodate South Warwickshire’s housing and employment needs over the plan period 2025-2050 in full. This section sets out how the housing and employment land requirements were derived, how these are compliant with the process set out by national policy, and what reasonable alternatives were considered as part of this process. In both cases, the nature of the respective requirements has played a key role in informing decision making regarding the spatial growth strategy. This is because the scale of the requirement has necessitated bringing forward greenfield sites, and in some cases, Green Belt sites. Careful consideration of the appropriate requirements to meet the housing and employment needs of the community was the starting point for the preparation of the growth strategy.

The SWLP is a joint local plan. The main purpose of this is to allow consideration of issues that arise from cross-boundary matters between Warwick District and Stratford-upon-Avon district. Most notably where these relate to the Strategic Highway Network, and the wider delivery of infrastructure. A starting point for consideration of the delivery of the spatial growth strategy has been the concept that housing and employment needs should be met by the district from which they arise, though the overall requirement acts as an aggregate joint requirement for both districts. Where constraints or land availability in one district have prevented it from meeting its own needs in full, land in the other district has been identified to contribute to the joint requirement. In terms of future monitoring, both Councils will act as separate entities for the purposes of Five-Year Housing Land Supply and the Housing Delivery Test.

2.1 Housing

The housing requirement for South Warwickshire is equal to the Local Housing Need (LHN) for Stratford-on-Avon District and Warwick District over the plan period 2025-2050. In line with national policy, LHN has been calculated using the Standard Method as set out in the NPPF and PPG. The Standard Method provides the minimum number of homes that strategic policy-making authorities as the starting point to inform the housing requirement over the plan period.

The housing requirement for South Warwickshire is set out in Table 2-1 below. Existing commitments (i.e. those sites that already have planning consent and will deliver homes in the new plan period after 1st April 2025) are then deducted resulting in a remainder or ‘to-find figure’ for the SWLP to plan for.

Table 2-1 South Warwickshire’s Housing Requirement

Local Housing Need via Standard Method (May 2025)	Stratford-on-Avon	Warwick	South Warwickshire
Total housing need (per annum)	1,112	1,085	2,197
Total housing need (25-year plan period)	27,800	27,125	54,925

Existing commitments	3,825	6,149	9,974
Minimum residual dwellings to be allocated	23,975	20,976	44,951

Existing commitments include the following sites:

- All sites with either outline or full planning permission on 31st March 2025
- All sites under construction or where initial site works had commenced on 31st March 2025
- All sites with permission in principle on 31st March 2025
- All sites for older persons' residential institutions¹⁰ (C2 uses) with planning permission on 31st March 2025

It should be noted that as further sites are granted consent, these will also contribute to the housing supply for the plan period. They will have the effect of increasing the 'headroom' over and above the current levels of contingency. These include sites which are currently the subject of active planning applications sites where the presumption in favour of sustainable development will apply¹¹ and may need to be granted planning permission by both Councils in the absence of the 5-year housing land supply and in advance of adoption of the SWLP. The housing need and supply figures may be updated ahead of Examination and Adoption through a forthcoming detailed housing topic paper, to provide the most up-to-date picture of these matters.

The changes to the Standard Method in December 2024 increased the minimum Local Housing Need referred to in the Preferred Options from 41,975 dwellings (as indicated in the 2022 Coventry and Warwickshire HEDNA) to 54,925 dwellings at May 2025. The Councils have not identified any overarching constraints that would prevent meeting its housing need in full, and in doing so will seek to meet the Government's objective of significantly boosting the supply of homes in the area.

It is accepted that the standard method figures will change annually to adjust for the annual updates to the affordability ratios and dwelling stock estimates in each local authority area (see Table 2.2). The SWLP uses the Local Housing Need calculated using the standard method at May 2025, as this is appropriate for the start of the plan period in April 2025. There have been some minor variations in the very recently published May 2026 LHNs, but this results in the same overall combined Local Housing Need figure for South Warwickshire. Therefore, the May 2025 LHN is still appropriate to use as the housing requirement for the South Warwickshire Local Plan. This will be kept under review in accordance with the Planning Practice Guidance which does not require a plan-making authority to be bound by the LHN figure from the start of the plan period.¹²

¹⁰ A conversion factor has been applied to the number of bedspaces to convert this into an equivalent number of market dwelling

¹¹ NPPF 2024 - Paragraph 11(d)

¹² Planning Practice Guidance on Housing and economic needs assessment (Paragraph: 008 Reference ID: 2a-008-20241212) states that local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time the plan is submitted.

Table 2.2 Local Housing Need standard method calculation results

	Stratford-on Avon	Warwick	South Warwickshire (Stratford and Warwick)
Dec 2024	1,126	1,062	2,188
May 2025	1,112	1,085	2,197
May 2026	1,084	1,113	2,197

A degree of headroom or flexibility above Local Housing Need is being incorporated into the SWLP through the identification of housing supply which will exceed the requirement. This headroom also assists with achieving a 5-year housing land supply and is both a pragmatic and sensible approach that demonstrates the robustness of the SWLP. The headroom currently represents circa 2.5% above Local Housing Need.

2.2 Employment Land

The evidence base for employment land needs is drawn from several different documents, primarily the following:

- Coventry & Warwickshire Housing and Economic Development Assessment (HEDNA) (2022),
- West Midlands Strategic Employment Sites Study (2024)
- Coventry & Warwickshire HEDNA/WMSSESS Alignment Paper (2024)
- HEDNA - WMSSESS Alignment Paper Addendum (2025)
- South Warwickshire Employment Land Study Update (2026)
- South Warwickshire New Settlements Note (2026)

Collectively these papers provide demand-side findings that provide the overall employment need. In addition, the following evidence base documents have been prepared specifically to inform the selection of employment sites in the SWLP:

- Employment Trajectory Note (2026)
- Coventry Airport Note (2026)
- Jobs-Homes Alignment Paper (2026)

Annexe B – Employment Growth – Detailed Review provides a detailed review of how the growth requirements for employment land have been derived and met.

For the purposes of the SWLP, strategic industrial need refers to demand for sites in industrial use (Use Class B2/ B8/ E(g)) that meet the three following criteria: they are at least 25ha in area, at least 75% of the site is dedicated to units over 9,300sqm, and they have good access to the Strategic Road Network. For South Warwickshire this means that the focus for Strategic Industrial Growth is along the A46/M40 corridor, reflecting the locational requirements of

regional and national occupiers such as large logistics operators and major manufacturers. This means that in some cases, large sites such as Wellesbourne Airfield are classified as counting towards local rather than strategic need due to their less optimal location in relation to the Strategic Road Network. The WMSESS identifies this need at a regional level because the market operates across local authority boundaries, and so in this context, strategic also refers to the spatial context. The total residual strategic employment need is 125ha as confirmed by the South Warwickshire Employment Land Study 2026¹³, accounting for the range provided of 75-125 ha as an output from the WMSESS.

Non-Strategic Need is identified in the South Warwickshire Employment Land Study Update (2026), which uses the latest available completions data to the period 2024/25 accounting for the Covid-19 Pandemic, and associated market changes. It identifies a combined non-strategic need for local units below 9,300 sqm, and units over 9,300 sqm on non-strategic sites based on the categorisation set out above. The Employment Land Study 2026 confirms these figures as being 86ha for Warwick and 147.7 ha for Stratford having accounted for commitments, a full list of existing employment is set out in Appendix A4 of the South Warwickshire Employment Land Study Update 2026.

The South Warwickshire Employment Land Study Update (2026) updates the office need requirement for South Warwickshire set out in the HEDNA (2022) to take account of more recent evidence and capture post-Covid market signals. The Employment Study Update sets out that there is a residual need for 57,900 sqm of office floorspace (equivalent to 11.6ha of land) across South Warwickshire up to 2050.

However, the South Warwickshire Employment Study Update(2025) considers that significant stand-alone allocations for office developments are unlikely to be developed, as rents are considered insufficient to support substantive speculative development. The overall office land need has therefore been combined and amalgamated within the overall residual non-strategic employment land need of 233.7ha within South Warwickshire.

Table 2-2 South Warwickshire Employment Land Requirements

Employment Need (Ha)	Stratford	Warwick	South Warwickshire
Residual (net) non-strategic industrial and office need	147.7	86	233.7
Residual (net) Strategic Employment Land Needs			75-125

Further details of the Employment Land Requirement in relation to the evidence base can be found at length in Annex B – Employment Growth: Detailed Review.

¹³ Icení (2026). South Warwickshire Employment Land Study. Available at: <https://www.southwarwickshire.org.uk/doc/214492/name/South%20Warwickshire%20Employment%20Land%20Study%20Update%20Final%20Report%202026%20V2.pdf>. (Accessed 21/05/2026).

2.3 Reasonable Alternatives

The SWLP is accompanied by a Sustainability Appraisal /Strategic Environmental Assessment (SA/SEA) that assesses the significant impacts of the SWLP proposed approach as well as a number of reasonable alternatives. It then considers what mitigation could be applied to reduce the significance of any negative impacts. The SA/SEA is a legal requirement and has been prepared by external consultants in tandem with the preparation of the SWLP itself.

In determining the housing requirement, several reasonable alternatives have been identified throughout the SA process:

- The HEDNA trend-based projections point to a need for 41,975 dwellings in total throughout the Plan period with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of 1,679 per annum.
- The previous Standard Method calculation (as per 2022) identified a need for 30,975 dwellings in total throughout the Plan period, with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of 1,239 per annum.
- The updated Standard Method calculation (as per 2024) identified a need for 54,700 dwellings in total throughout the Plan period, with 1,126 dwellings per annum in Stratford-on-Avon and 1,062 dwellings per annum needed in Warwick. Combined total of 2,188 per annum (Preferred).
- The updated Standard Method calculation identified a need for 54,925 dwellings in total throughout the Plan period, with 1,112 dwellings per annum in Stratford-on-Avon and 1,085 dwellings per annum needed in Warwick. Combined total of 2,197 per annum
- The updated Standard Method calculation, plus a 10% uplift to provide for the unmet need from other local planning authorities as a contingency, resulting in a need for 60,418 dwellings in total throughout the Plan period. Combined total of c.2,417 per annum.

In respect of housing affordability, the calculation of the standard method includes an in-built affordability factor to address this issue. It is also noted that affordability has improved Stratford-on-Avon as demonstrated by the reduction in the Standard Method figures (see Table 2.2 above) because of sustained record levels of housing delivery. The SWLP also seeks the provision of affordable housing provided as a minimum percentage requirement of general market schemes as well as explicitly supporting local needs affordable housing schemes. Whilst it is accepted that increasing the housing requirements further would most likely increase the overall quantum of affordable housing across South Warwickshire, this needs to be seen in the wider delivery context.

The Standard Method is already predicated on an increased housing supply which requires sustained delivery over the long-term as opposed to peaks of supply. Further significant increases in housing will also have environmental impacts and the capacity of South Warwickshire to accommodate such levels of housing have been highlighted as causing negative impacts in the accompanying SA/SEA. On balance, the Standard Method housing figures as minimum presents the most sustainable option when setting the housing requirement for South Warwickshire.

2.4 Maintaining Effective Co-operation

SDC and WDC have a long history of proactive and productive cross-boundary working. Both Councils attend the monthly Coventry Solihull Warwickshire Association of Planning Officers meetings and SDC is also a member of the Greater Birmingham, Black Country and Solihull Housing Market Area group. Both Councils were also members of the Coventry and Warwickshire Local Enterprise Partnership and are non-constituent members of the West Midlands Combined Authority (WMCA). Various cross-boundary studies have been prepared to inform decisions about development planning. Meetings have also been held with neighbouring authorities outside of the two housing market areas, mainly to the south of Stratford-on-Avon District, namely Wychavon, Cotswold, Cherwell and West Northamptonshire. The lack of formal arrangements with these authorities reflects the rurality of this area, the different HMAs, and the lack of strategic cross-boundary issues. Much of this area is also designated as the Cotswolds National Landscape and SDC participates actively in the Conservation Board.

Consideration was given as to whether any unmet housing need from neighbouring authorities should be incorporated into the requirement. Having regard to the requirements of the Duty to Co-operate (noting its abolition) and the position set out by neighbouring authorities, the Councils concluded that meeting the standard method in full presents the most appropriate approach to meeting the development requirements for the plan period, but with headroom provided for flexibility to deal with changing circumstances, including shortfalls, should they arise.

Coventry and Warwickshire

The primary cross-boundary matter relates to the ability of the City of Coventry to meet its housing and employment requirements within its administrative boundaries. With the publication of the Standard Housing Method, the housing requirement for Coventry has fallen significantly to the extent that the City Council is satisfied that it can meet its housing requirements within its boundary.

It is in respect of employment land that the City Council has identified a shortfall of circa 9ha. The evidence base underpinning employment figures for Coventry also relies on the ICENI sub-regional HEDNA and supplementary documents for Coventry and Warwickshire as for South Warwickshire and has underpinned the preparation of the SWLP. In terms of the above shortfall, Rugby Borough proposes to contribute 2.5ha and the SWLP will also contribute to addressing these unmet needs. The Coventry City Local Plan is currently at examination and the assumptions regarding employment needs are being tested. Given that the selection of employment sites in the SWLP naturally provides for additional land, it is reasonable to assume that some of this overprovision, at least in part, can be counted towards any shortfall that does arise from Coventry. Some overprovision is intended to be retained for South Warwickshire purposes to act as headroom and provide flexibility to ensure that the employment needs of South Warwickshire are achieved.

Greater Birmingham, Black Country and Solihull

Planning for housing in the GBBC HMA is complex not only given the fact that the HMA comprises 14 planning authorities but also because of the different stages preparation of each

local plan is at. A Strategic Options Study is being prepared for the HMA to consider how housing shortfalls could reasonably be met. Importantly, the study does not take into account proposals in emerging plans and so its assumptions regarding housing shortfalls do not reflect the up-to-date position or the realities of plan-making in South Warwickshire where needs are being met in full. Notwithstanding this, the study identifies a number of locations for potential growth, and these are consistent with the emerging SWLP.

As with the situation in Coventry, housing requirements have decreased following publication of the Standard Method. Birmingham City Council can meet its housing requirements within its administrative area. Discussions with neighbouring Solihull, Bromsgrove and Redditch councils have confirmed their position that they expect to be able to meet their own housing needs. Given the lack of interrelationship between the Black Country authorities and South Warwickshire, and the fact that there are authorities functionally related to the Black Country in Staffordshire and Shropshire, it is considered reasonable that any unmet housing needs arising from the Black Country should not be met in South Warwickshire. Notwithstanding the above, the West Midlands metropolitan authorities have already commenced preparation of their Spatial Development Strategy which will be the correct vehicle to addressing all future housing needs.

In respect of employment, a Strategic Employment Study¹⁴ has been prepared and this has identified needs across the wider West Midlands Region. This study is informing the preparation of the SWLP and the proposals within the SWLP are consistent with the Areas of Search identified by the study.

Oxford, Cheltenham and Northampton

The functional relationships between these housing markets and South Warwickshire are weak and it is reasonable to consider that those authorities fully within those HMAs are capable of meeting their own needs given the size of those HMAs. Notwithstanding this, SDC has been approached by Cotswold District Council to assist with meeting their housing needs given that 80% of their District is within the Cotswolds National Landscape. It is noted that the needs are arising predominately from the south of Cotswold District in the Cirencester area. The functional relationship between this area and South Warwickshire is weak and it is considered reasonable that in any event, such needs could more appropriately be met closer to their point of origin, possibly to the south or east of Cotswold District.

Given the presence of the Cotswolds National Landscape, no strategic employment relationships have been identified. The M40 forms a strategic corridor and connects Banbury (in Cherwell District) with Leamington (South Warwickshire) and the West Midlands. Whilst no unmet employment needs have been identified, the proposals in the SWLP have been located to address these functional interrelationships.

¹⁴ Avison Young & Arcadis (2021). West Midlands Strategic Employment Sites Study – Final Report. Available at: <https://www.stratford.gov.uk/doc/210445/name/21%2005%2016%20WMSESS%20Publication%20FINAL.pdf>. Last accessed: 21.05.2026.

2.5 Neighbourhood Development Plans

Paragraphs 69 and 70 of the NPPF advise that:

“...strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”

Both a requirement figure (as a component of the overall SWLP housing requirement) and an indicative figure provide clarity to parish and town councils regarding what level of housing they should proactively be planning for within their neighbourhood plan. Aside from the fact that setting an NDP requirement figure through the SWLP would be perceived as being ‘top-down’ – arguably, the antithesis to neighbourhood planning - the difference in approach is more pertinent to the SWLP itself. Including an allowance for NDPs to plan for would be the equivalent to a windfall allowance. Whilst it would reduce the number of homes that need to be found on allocations within the SWLP, it would add risk to the SWLP in so far that the SWLP’s housing trajectory would be reliant on parish and town and parish councils (a) preparing NDPs (there is no compulsion to do so) and (b) including housing allocations within those plans (again there is no compulsion to do so). Doing so would also, arguably appear contrary to the non-dispersed approach promoted by the SWLP.

Providing parish and town councils with an indicative figure means that any homes that do come forward via neighbourhood plans can be treated as windfalls. Specifically, the windfall allowance set out in the SWLP does not assume any supply from NDP sites. Thus, any home that did come forward from this source of supply would be in addition to the windfall allowance made. In turn, this approach provides further flexibility and contingency to the SWLP housing trajectory and demonstrates the robustness of the Councils approach to planning for housing in the SWLP.

3 Developing the Spatial Strategy

This section sets out how the spatial strategy has evolved through the plan-making process to date, informed by consultation with stakeholders and the public, with the outcomes from each stage shaping what was consulted on at the subsequent stage.

This section should be read in conjunction with consultation documents and their supporting evidence which are available for access on the SWLP website on the Technical Evidence Page.

Throughout the development of the South Warwickshire Local Plan, in addition to engagement with residents through public consultation, there has also been extensive consultation with stakeholders and elected members through advisory groups and meetings. In addition to an Officer Steering Group comprising colleagues from other District Council departments and Warwickshire County Council, a Member Advisory Group has acted as a working/steering group to inform the preparation of the SWLP. Regular meetings have also been held with highways and education colleagues along with meetings with other providers as necessary.

3.1 Scoping Consultation

The starting point for the preparation of the South Warwickshire Local Plan was the initial Scoping and Call for Sites consultation in 2021. The Scoping and Call for Sites Document¹⁵ identified the cross-boundary issues that exist between the districts and the need for them to be resolved strategically. The key output of the scoping exercise was the identification of the strategic objectives which informed the vision for SWLP.

The Scoping document identified seven initial options for growth:

- Option A: Rail Corridors.
- Option B: Main Bus Corridors.
- Option C: Main Road Corridors.
- Option D: Enterprise Hubs
- Option E: Socio-economic
- Option F: Main Urban Areas
- Option G: Dispersed

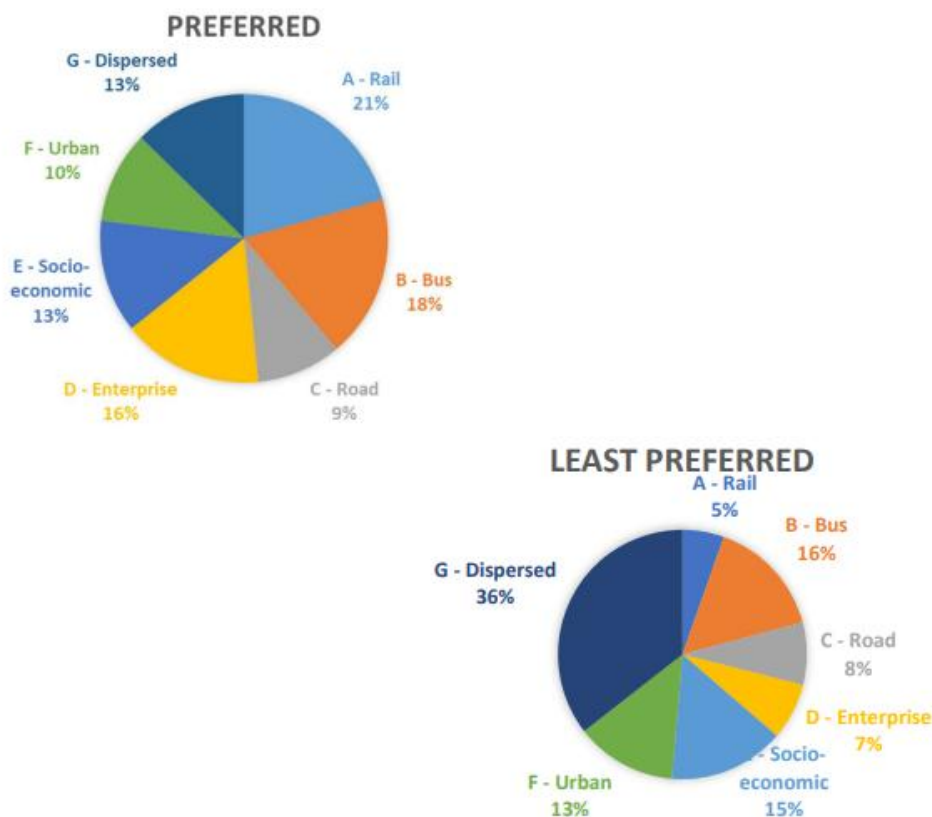
Each option identified potential locations in relation to identified designations, these were settlements and locations near railway stations, key bus routes, the Strategic Road Network (SRN), or local features such as locations of major employments or areas of deprivation. Additionally, options were considered that focused more on the characteristics of settlements themselves. One of these initial options was focusing growth on the five main urban areas of South Warwickshire, and areas adjacent to other urban centres falling within other administrative area of partner authorities; Kenilworth, Royal Leamington Spa, Stratford-Upon-Avon, Warwick, Whitnash, South of Coventry, East/South East of Redditch. Alternatively, a dispersed approach was considered that would focus growth on main towns, main rural centre

¹⁵ South Warwickshire Councils 2021. South Warwickshire Local Plan: Stage 1: Scoping and Call for Sites Consultation.

and growth villages identified in the existing spatial strategies of the adopted local plans of both authorities.

Of the 7 options identified, the most preferred was Option A: Rail Corridors by 21% of respondents. Option C: Main Road Corridors was least favourably considered option, with only 9% of respondents identifying it favourably. Notably, the largest response was for a hybrid approach with Option A: Rail Corridors, Option B: Main Bus Corridors and Option D: Enterprise the most common identified approaches to be considered as part of a hybrid approach. Whilst there was no overwhelming preferred growth option identified from the initial scoping exercise, a key feature was the opposition to Option G: Dispersed which was the least preferred option:

Figure 3-1 Preferred and least preferred options from scoping feedback



Option G: Dispersed was retained as an emerging option at Issues and Options because it closely reflected the existing pattern of growth in South Warwickshire and retained a great deal of flexibility in terms of its implications in the type of dispersed approach. It was also recognised that for the SWLP to be consistent with national policy, some limited in growth in smaller settlements would be required to support the overall sustainability of these places.

Initial high level climate change analysis was carried out of each option however there was a general sense that this was premature point for any option to be discarded on those grounds.

The scoping document also introduced the concepts of densification, new settlements and Green Belt as secondary considerations within the emerging growth strategy. These considerations influence the number of homes that would be met in a set number of locations and have all formed elements of preferred growth strategy. The densification approach sees the greatest viable number of homes delivered on the smallest number of sites; the new settlements approach sees the development of many homes built in large quantities in locations capable of delivering substantial amounts of infrastructure to reduce pressure in existing towns and villages. The Green Belt element was broader consideration of whether green belt release should be delivered as part of the SWLP, and what level of release could be considered sustainable development.

Densification was supported by the public¹⁶ in terms of supporting the reuse of brownfield land, however it was felt that this wouldn't meet the need for growth alone. It was also noted that the range of potential locations for growth in South Warwickshire meant that there were inevitably locations where higher densities would be inappropriate responses to both townscape and landscape features. New Settlements were also supported by 37% of respondents, whilst 27% were against. The remainder were indifferent. Likewise, 54% of respondents supported the exploration of growth opportunities in the Green Belt, with 31% against.

The scoping document also identified a series of key strategic issues, People, Housing, Design, Transport, Economy, Utilities, Resources, Land, Climate, Water, Health, and Culture. Feedback from this played a further role in setting out the emerging spatial growth strategy at the Issues and Options consultation.

3.2 Issues and Options

The next step for the preparation of the South Warwickshire Local Plan was the Issues and Options consultation in 2023¹⁷.

At issues and options, the seven potential spatial growth options were refined into five growth options. Some of these spatial growth options were brought forward directly from the scoping consultation whilst others were hybrid options. These refined options are set out below:

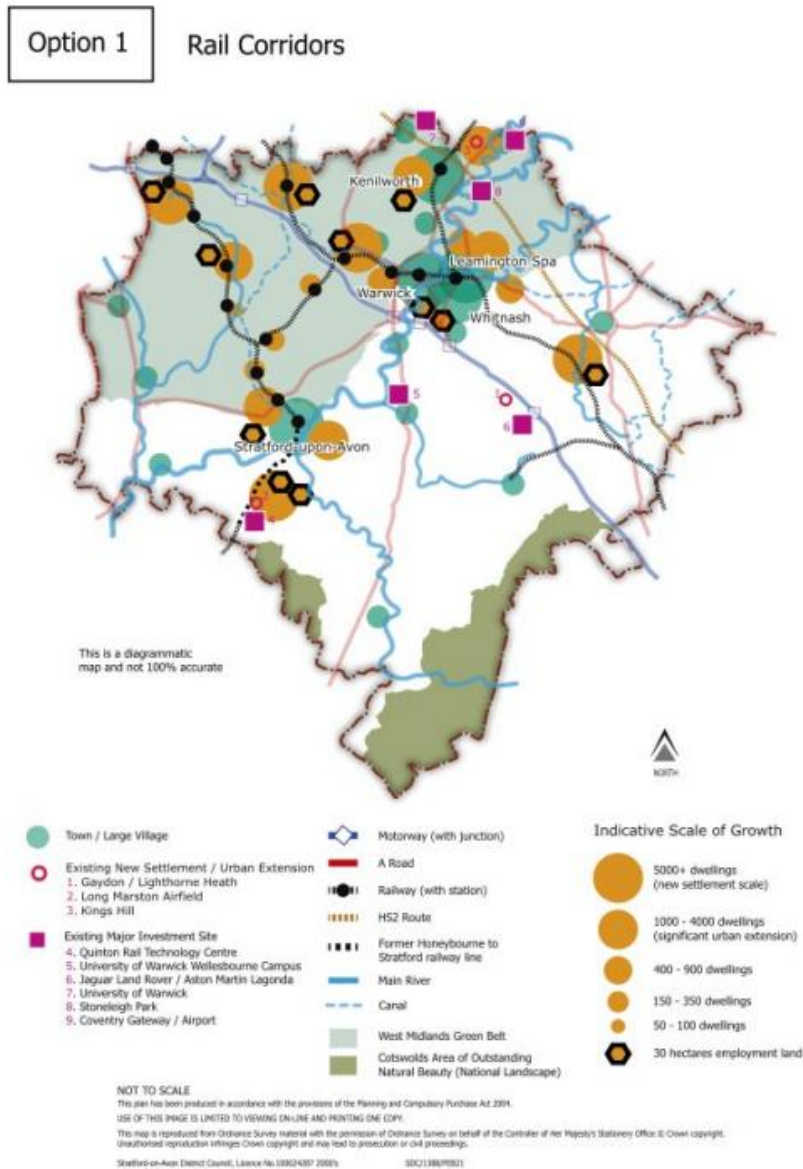
¹⁶ South Warwickshire Councils (2022). South Warwickshire Local Plan Scoping and Calls for Sites Consultation 10 May to 21 June 2021: Consultation Statement. Available at: <https://www.southwarwickshire.org.uk/doc/210927/name/Consultation%20Statement.pdf>

¹⁷ South Warwickshire Councils (2023). South Warwickshire Local Plan Part 1: Stage 2 – Issues and Options Consultation. Available at: <https://www.southwarwickshire.org.uk/doc/211702/name/WEB%20J26939%20SWP%20Issues%20and%20Options%20Consultation%20JAN%202023.pdf>. Last accessed: 16/03/2026

Option 1- Rail corridors:

This option developed Scoping Option A: Rail corridors. Option 1 focussed growth in rail corridors, particularly around existing railway stations, but also anticipates the possible of new or re-opened stations on existing lines or reopening closed lines. It was noted that railway stations are not evenly spread over the area, with many very small villages, and that this approach would require the utilisation of new settlements. Another key consideration identified was that most of the existing railway's stations would lie within the Green Belt.

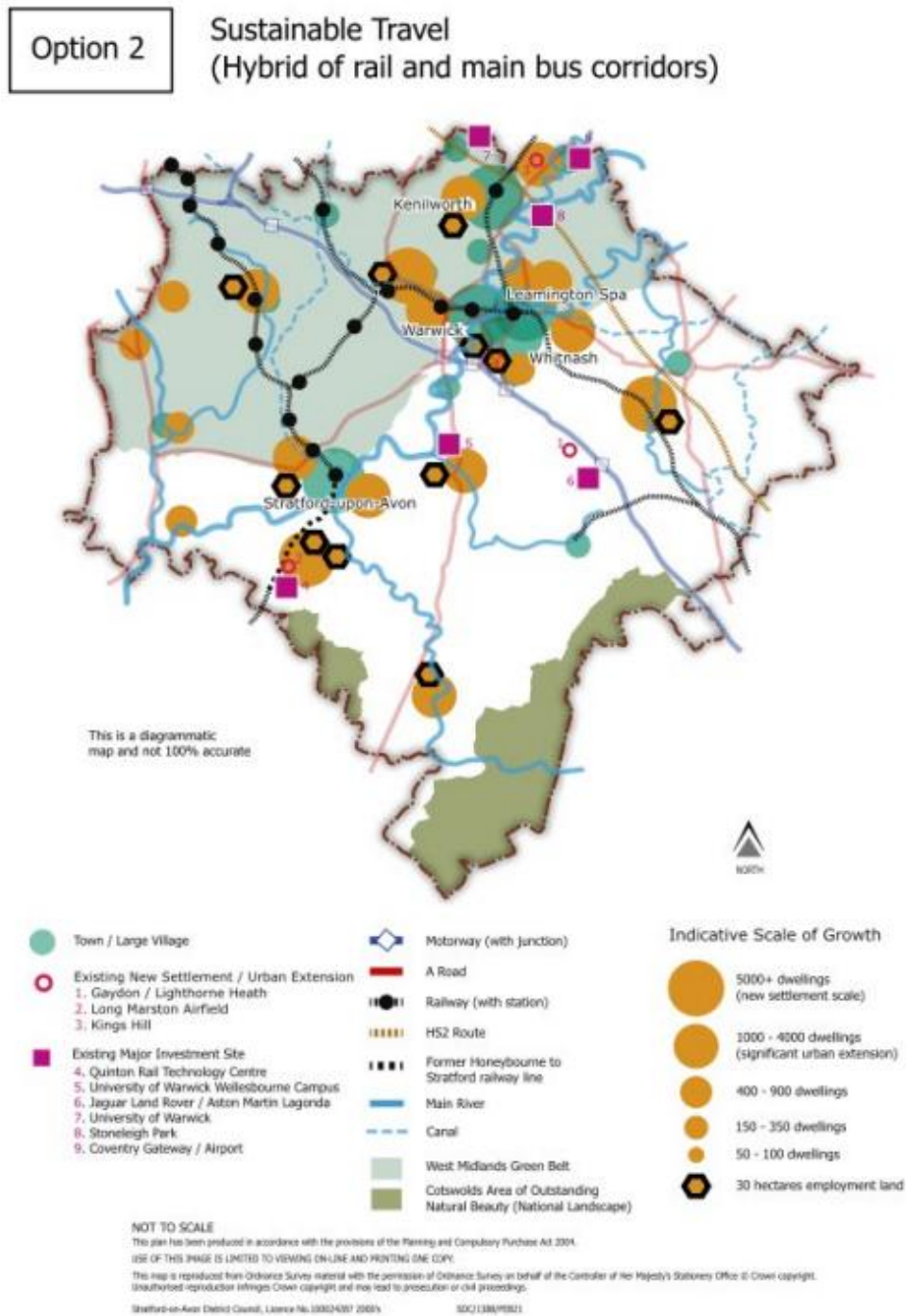
Figure 3-2 Option 1 – Rail Corridors



Option 2 – Sustainable Travel

Option 2 – Sustainable Travel was a hybrid option of Scoping Option A: Rail Corridor and Scoping Option B: Main Bus Corridor. It recognised that many areas in South Warwickshire are only reachable by bus, and in expanding the growth from beyond railway stations and utilising bus corridors, less pressure would be placed on Green Belt land.

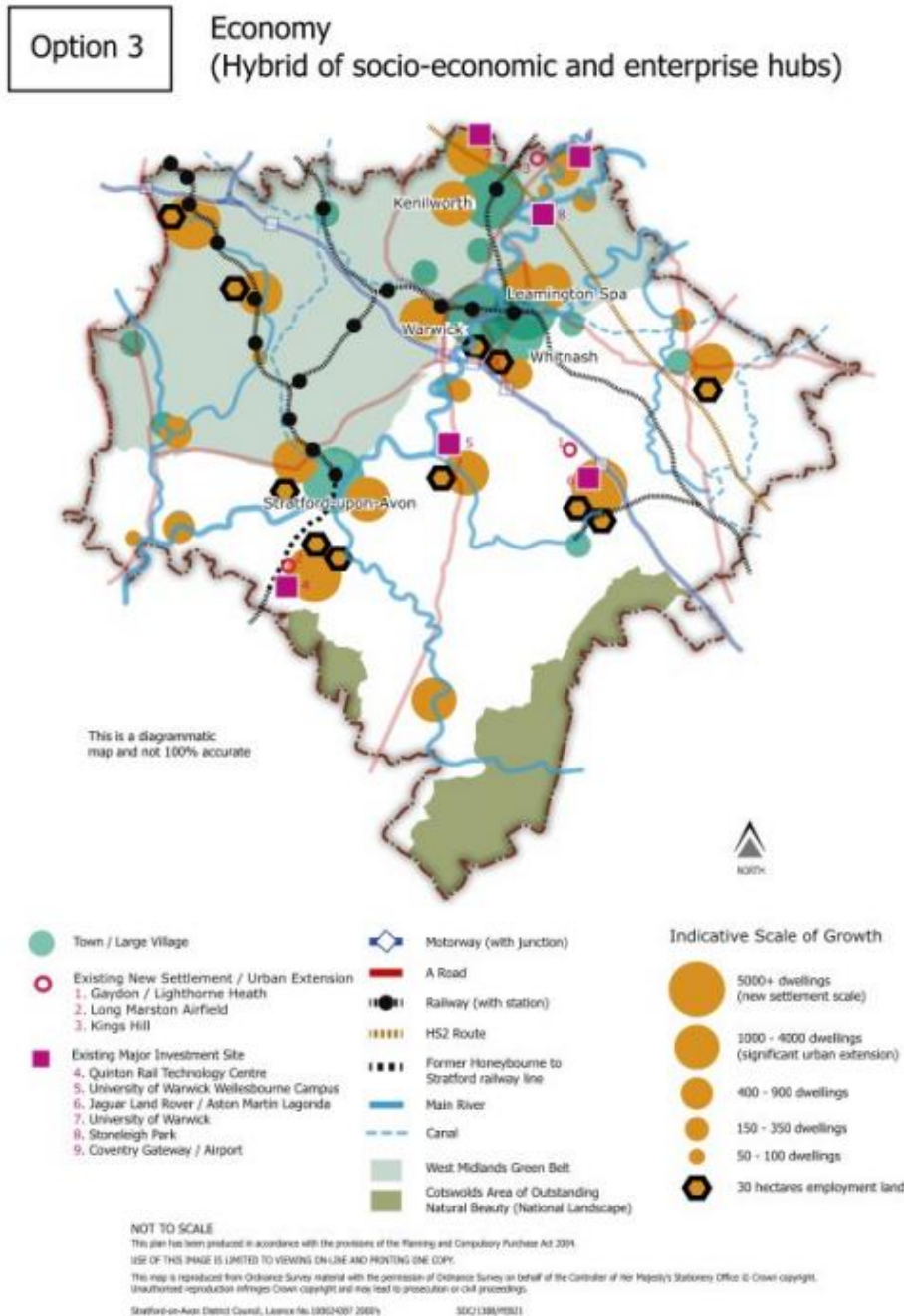
Figure 3-3 Option 2 – Sustainable Travel



Option 3 – Economy

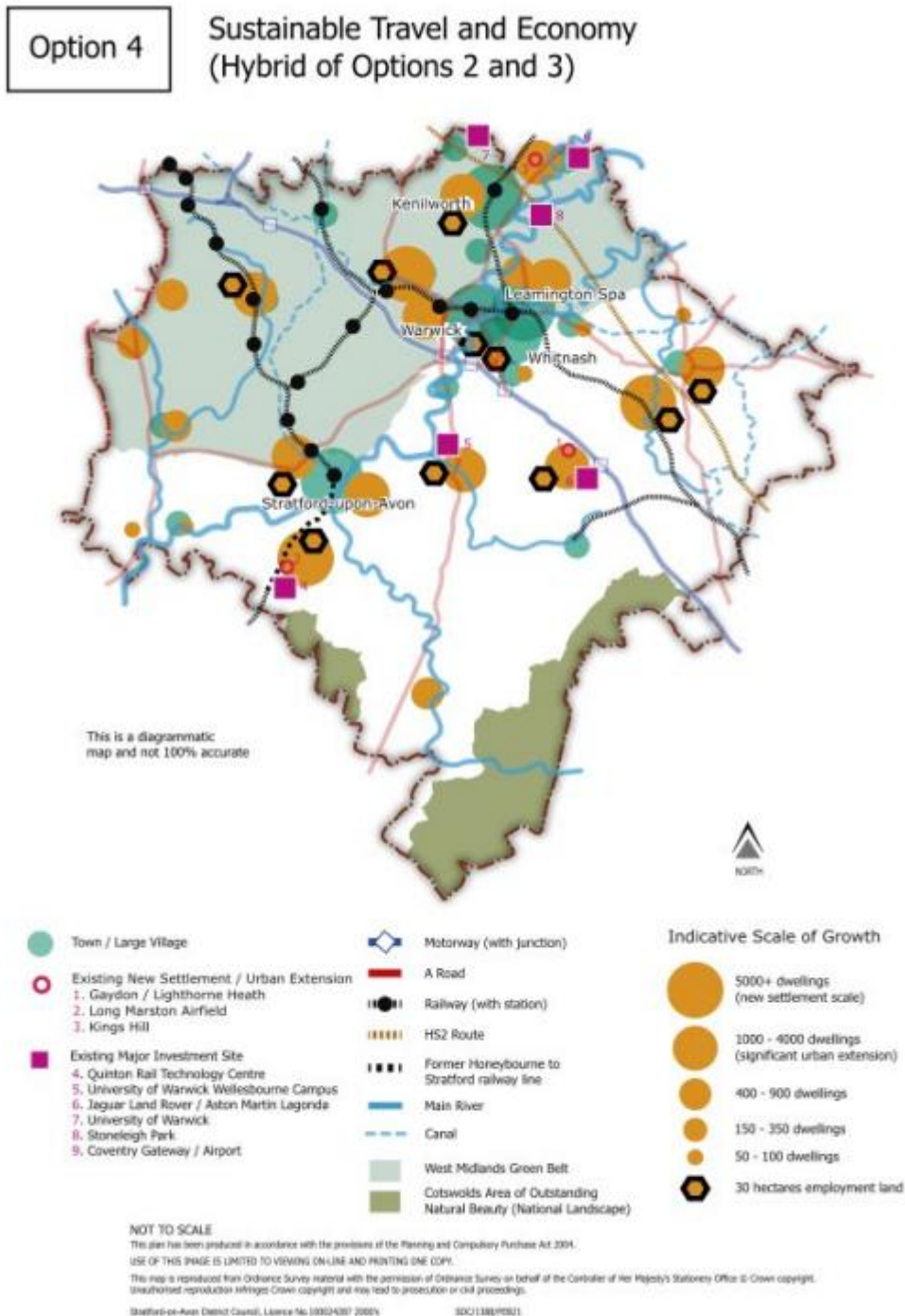
Option 3: Economy was also a hybrid approach, containing Scoping Option D: Enterprise Hubs and Scoping Option E: Socioeconomic. This option located homes close to existing jobs and potential locations, whilst tackling socioeconomic disadvantage through the benefits that development brings through infrastructure commitments. A benefit of this approach was the greater emphasis that it might bring to active travel given the co-location of housing with employment in a single location.

Figure 3-4 Option 3: Economy



Option 4: Sustainable Travel and Economy:

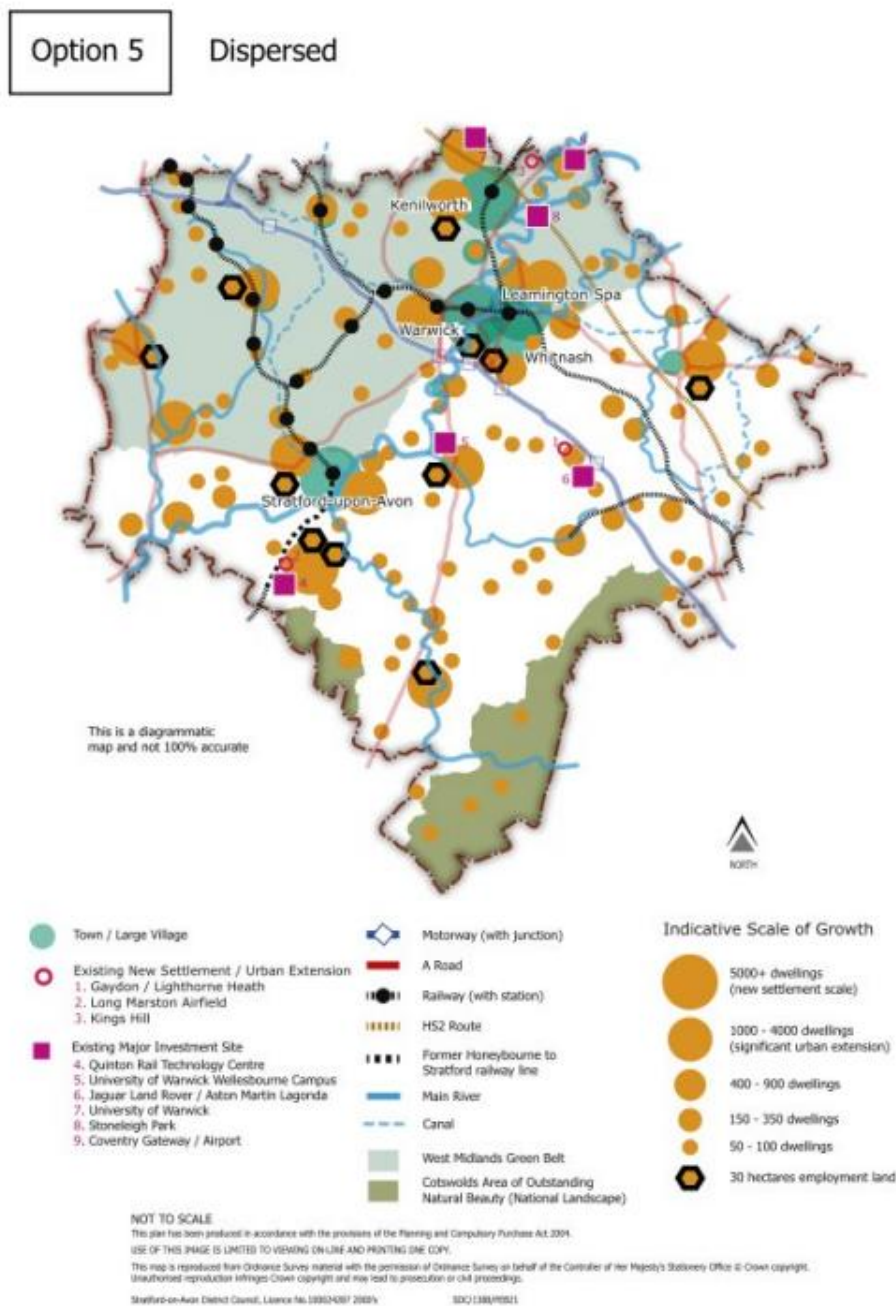
Option 4 was a hybrid option of options 2 and 3, to allow greater flexibility in selecting the most suitable locations that fall within both options individually. The benefits of this option were that it allowed a balance of growth at existing main settlements, with growth at new settlements along railway lines, and modest growth in smaller settlements to ensure their viability. It was also recognised that this allowed for greater balance between Green Belt and non-Green Belt locations.



Option 5- Dispersed

This was bought forward from Scoping Option G: Dispersed. This option dispersed growth to a wider range of locations. This means that the amount of growth in individual locations is reduced but with a higher number of settlements taking some growth. Taken in isolation, the dispersed approach would inevitably have been poor performing in terms of active travel; however, it would follow the pattern of existing settlements and lead to a balance between Green Belt and non-Green Belt Land.

Figure 3-5 Option 5- Dispersed



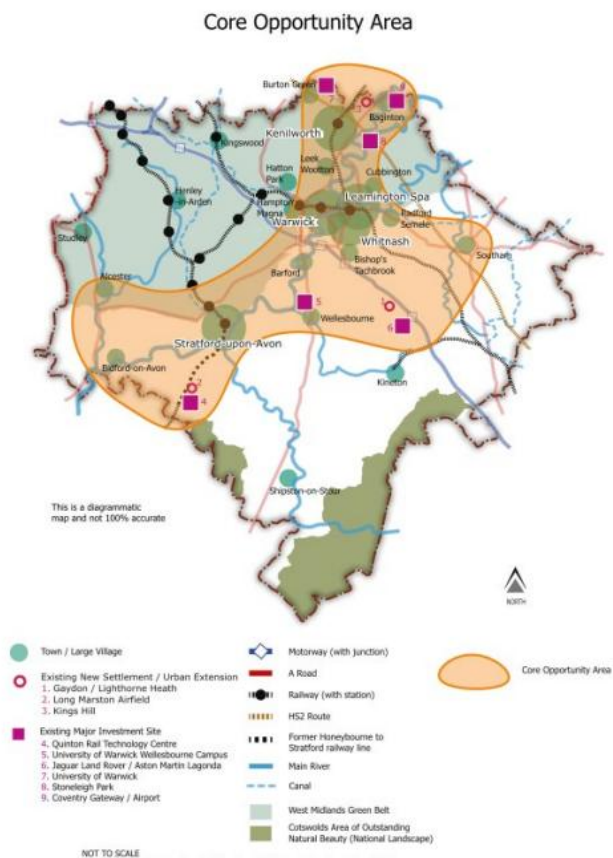
The most supported option¹⁸ at Issues and Option was Option 4: Sustainable Travel and Economy, with 258 respondents in total. Of which 139 felt that the option was appropriate, 71 felt that the option was inappropriate and 48 providing neutral responses. This option was supported due to the perception that it provided a good balance between existing and new settlements, however there would have been to focus on expanding infrastructure provision in existing settlements as applicable.

The least supported option was Option 5: Dispersed growth, where there were 387 respondents in total. In total 107 respondents supported the dispersal of development, 234 objected and 46 were neutral. It was felt that this approach was already in place in both Districts and has a negative impact on residents currently. It was felt that this approach responds to housing targets and not to the infrastructure needs of the community. Warwickshire County Council also noted that larger schemes are better placed to provide Section 106 agreements capable of providing strategic infrastructure that cannot be provisioned through accumulated smaller schemes. However, there were also responses noting that this approach follows the NPPF and allows for balance around the district.

The Issues and Options document also introduced the approach to employment land and created core opportunity area intersecting the five main towns, the A46 corridor and the M40 corridor.

Figure 3-6 Core Employment Opportunity Area

¹⁸ South Warwickshire Councils (2023). South Warwickshire Local Plan Issues and Options Consultation and second Call for Sites 9 January to 6 March 2023. Consultation Statement October 2023. Available at: <https://www.southwarwickshire.org.uk/doc/212292/name/Final%20Merged%20Consultation%20Statement.pdf>. Last accessed: 16.03.2026.



This core opportunity area provides a range of locations capable of providing land to meet the strategic and non-strategic needs identified by the employment land studies identified in Section 2 of this report. The Major Investment Sites located within this area include:

- University of Warwick Main Campus Area
- South of Coventry including Coventry Airport, Coventry Gateway and the National Battery Innovation Centre.
- Wellesbourne including University of Warwick and Wellesbourne Airport.
- Long Marston area including the Long Marston Rail Innovation Centre
- Stoneleigh area including the Long Marston Rail Innovation Centre.
- Stoneleigh Area including Stoneleigh Park agricultural science park.
- Gaydon M40 J12 area including Jaguar Land Rover and Aston Martin Lagonda.

The Issues and Options consultation was supported by its own topic paper¹⁹ which sets out the stakeholder engagement that occurred to derive the five spatial options presented in the Issues and Options from the 7 growth options set out in the scoping report.

The paper notes how each approach has shared core elements including potential new settlements and densification of existing settlements. Seven potential new settlement locations

¹⁹ South Warwickshire Councils (2022) – Evolving the Spatial Growth Options – the story so far. Available at: <https://www.southwarwickshire.org.uk/doc/211510/name/Evolving%20the%20Spatial%20Growth%20Options%20the%20story%20so%20far.pdf>. Last accessed: 16.03.2026

were presented in the Issues and Options consultation as part of preliminary consultation work to inform site selection.

A key piece of evidence prepared in support of the Issues and Options consultation was the South Warwickshire Settlement Analysis²⁰ which reviewed connectivity, accessibility and density in main towns and smaller settlements. This work acted as initial operationalisation of the twenty-minute neighbourhood concept into the growth strategy. This is the idea that most day-to-day needs should be met within a reasonable walking distance from home, with a ten-minute walk to and from local amenities. The study identified opportunities and constraints in particular settlements in the context of the twenty-minute neighbourhood principle. This analysis was used to review all sites that were submitted through the Call-for-Site process and formed a part of the HELAA methodology to determine site selection.

3.3 Preferred Options

The Preferred Options consultation, held in January 2025 confirmed the overarching spatial growth strategy for the South Warwickshire Local Plan, as set out in the Preferred Options document²¹. The chosen strategy for the spatial growth strategy is Option 4 “Sustainable Travel and Economy”, and as a hybrid option includes the following elements – urban land, sustainable travel, enterprise hubs and socioeconomic factors. The inclusion of urban land reflects the wider sustainability requirements of the NPPF and the need to first utilise available urban brownfield land.

It should be noted that Option 4 was the broader hybrid option and so allows for the greatest variety in development locations whilst avoiding any less suitable locations. Alongside the support received as part of the Issues and Options consultation, this made a compelling case for selection as the spatial growth strategy for the South Warwickshire Local Plan.

The Issues and Options document identified an indicative list of settlements that may feature as part of option 4, these were: Alcester, Bidford-on-Avon, Bishop’s Tachbrook, Cubbington, Depper’s Bridge, Gaydon / Lighthorne Heath, Grey’s Mallory, Hampton Magna / Warwick Parkway, Hatton Station, Henley-in-Arden, Kenilworth, Leamington Spa, Long Marston Airfield, Long Itchington, Mappleborough Green / East of Redditch, Radford Semele, Salford Priors, Shipston-on-Stour, South of Coventry – Kings Hill, Southam, Stratford-on-Avon, Studley, Wellesbourne.

However, to allow for a more informed approach to site selection that responded more accurately to the identified characteristics of the chosen spatial growth strategy, the spatial concept of priority areas was developed. This work was a further refinement of the accessibility and connectivity studies that underpinned the Issues and Options Consultation. Three areas or zones of prioritisation were identified utilising buffers around identified features that reflect the

²⁰ South Warwickshire Councils (2023). South Warwickshire Settlement Analysis. Available at: <https://www.southwarwickshire.org.uk/doc/211519/name/J26864%20South%20Warwickshire%20Settlement%20Analysis%20JAN%2023%20FINAL.pdf> (Accessed 07.05.2025).

²¹ South Warwickshire Councils (2025). Preferred Options. Available at: <https://www.southwarwickshire.org.uk/doc/213277/name/Preferred%20Options%202025%20WEB.pdf>. Last accessed: 16/03/2026.

spatial growth strategy.²²). In summary, the approach establishes a hierarchy of sustainability where sites in Priority Area 1 are the most sustainable and sites in Priority Area 3 are the least sustainable, notwithstanding sites that are located outside any priority areas which are not considered to be in accordance with the spatial growth strategy. The approach is set out in Table 31 and shown spatially in Figure 37.

Table 33-1 Defining the Sustainable Transport and Economy Spatial Growth Strategy

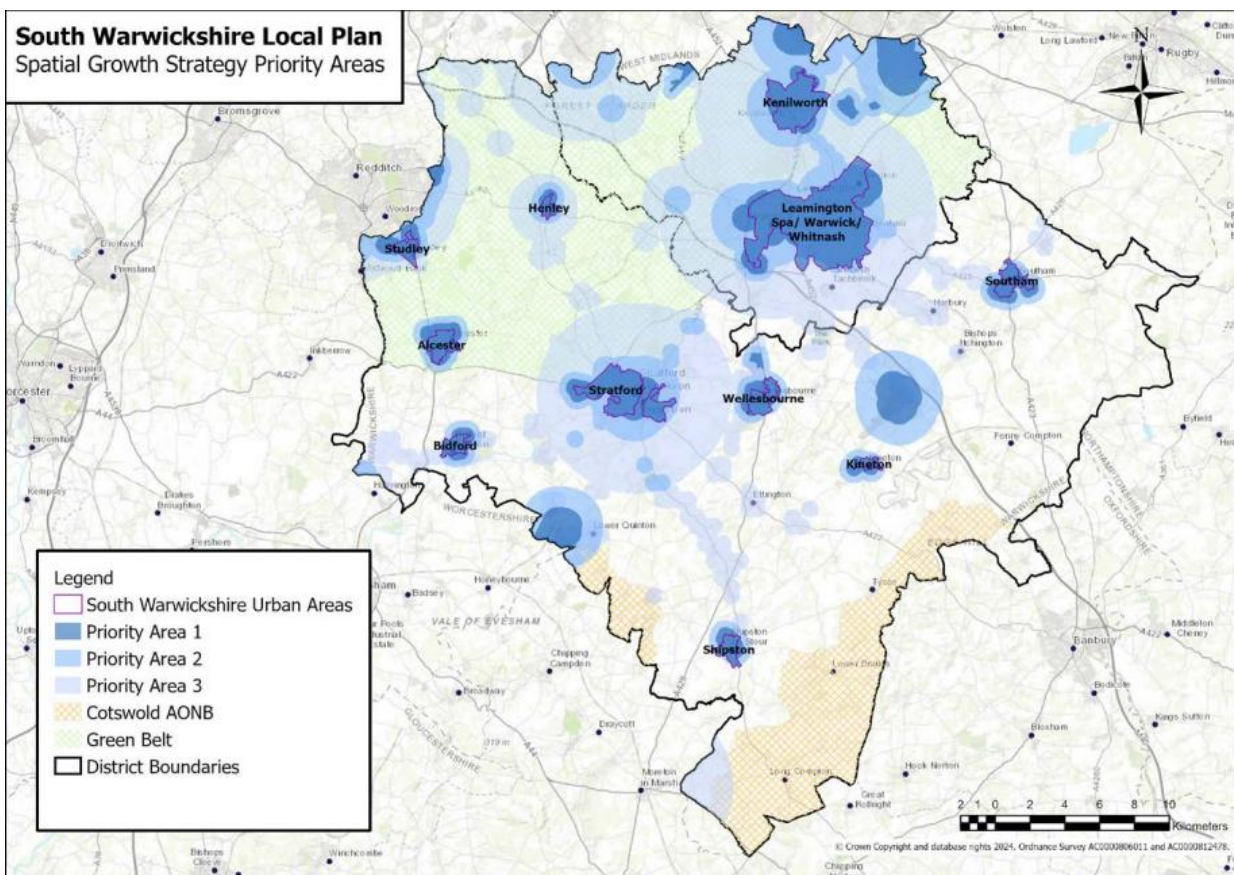
	Priority 1	Priority 2	Priority 3
Urban Land	<ul style="list-style-type: none"> • Within existing Built-Up Area Boundaries of main town, or Main Rural Centre 	-	-
Rail	<ul style="list-style-type: none"> • 800m of Group A station 	<ul style="list-style-type: none"> • 2km of Group A station 	<ul style="list-style-type: none"> • 5km of Group A station
	-	<ul style="list-style-type: none"> • 800m of Group B or Group C station 	<ul style="list-style-type: none"> • 2km of Group B or Group C station
	-	-	<ul style="list-style-type: none"> • 800m of Group D station
Bus	-	<ul style="list-style-type: none"> • Area with 0-15 min travel time to major town 	<ul style="list-style-type: none"> • Area with 15-30 min travel time to major town
Enterprise Hubs	<ul style="list-style-type: none"> • 800m of town centre (main towns) 	<ul style="list-style-type: none"> • 2km of town centre (main towns) 	<ul style="list-style-type: none"> • 5km of town centre (main towns)
	<ul style="list-style-type: none"> • 400m of town centre (Main Rural Centres) 	<ul style="list-style-type: none"> • 800m of town centre (Main Rural Centres) 	-
	<ul style="list-style-type: none"> • 400m of business park or industrial estate 	<ul style="list-style-type: none"> • 800m of business park or industrial estate 	-
	<ul style="list-style-type: none"> • 800m of major employment site 	<ul style="list-style-type: none"> • 2km of major employment site 	-
	<ul style="list-style-type: none"> • Within boundary of other significant rural employment site 	<ul style="list-style-type: none"> • 400m of other significant rural employment site 	-

²² A full explanation of the methodology that informed priority areas is provided in Chapter 4 of the Preferred Options spatial growth strategy topic paper

	-	<ul style="list-style-type: none"> 800m of neighbouring major settlement 	<ul style="list-style-type: none"> 2km of neighbouring major settlement
Socio-economic	<ul style="list-style-type: none"> 800m of LSOA in 10% most deprived for: <ul style="list-style-type: none"> Employment Domain Wider Barriers to Housing and Services Sub-domain 	<ul style="list-style-type: none"> 800m of LSOA in 20% most deprived for: <ul style="list-style-type: none"> Employment Domain Wider Barriers to Housing and Services Sub-domain 	<ul style="list-style-type: none"> 800m of LSOA in 30% most deprived for: <ul style="list-style-type: none"> Employment Domain Wider Barriers to Housing and Services Sub-domain

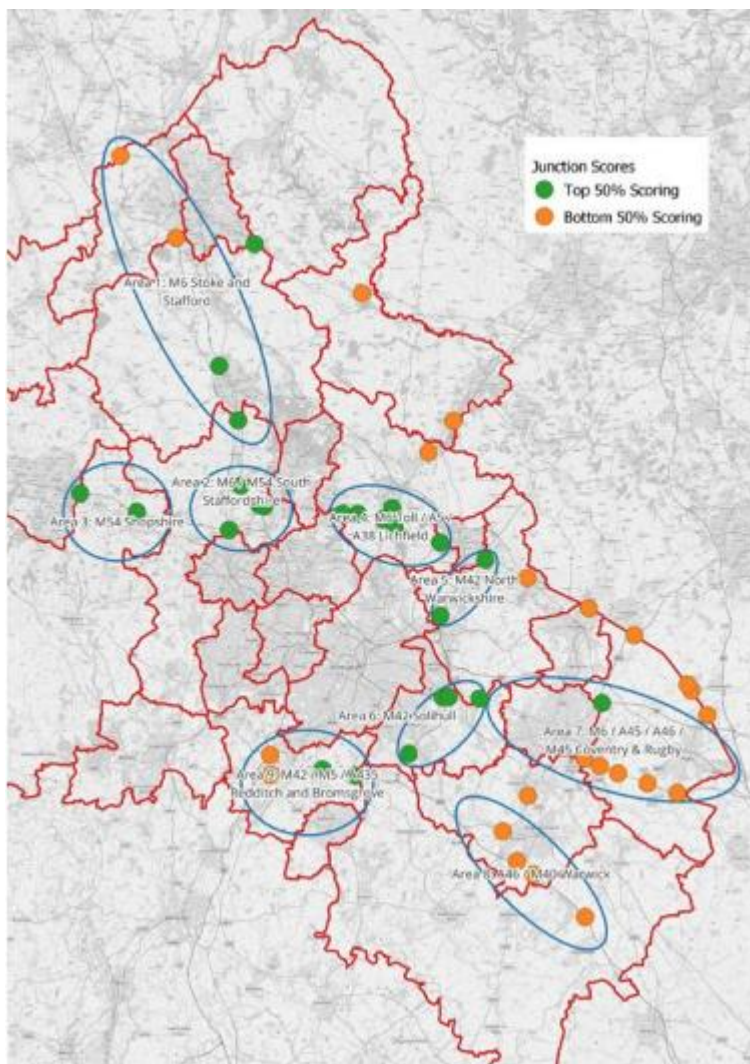
All buffer distances are *straight-line distances* from the point or boundary of the stated feature.

Figure 3-7 South Warwickshire Local Plan – Spatial Growth Strategy Priority Areas



The Preferred Options document also confirmed the need to meet a 75h-125 ha need of strategy sites within Road Opportunity Area 8, in the A46/M40 corridor. To be clear, it is proposed to meet strategic employment needs explicitly through priority areas noting that the focus on urban areas, rail corridors, bus stops and areas of socioeconomic deprivation areas are appropriate locations for employment as well as for housing, notwithstanding the wider requirement for employment need to be in proximity to the SRN.

Figure 3-8 Road Opportunity Area 8 WMSESS



Utilising priority areas, the following Strategic Growth Locations (SGLs) were identified as having potential to meet South Warwickshire’s Housing and Employment Needs:

Table 3-2 Strategic Growth Locations

Reference	Strategic Growth Location	District	Green Belt
SG01	South of Coventry Group	WDC	Majority GB ²³
SG02	Stoneleigh Park Employment Group	WDC	GB
SG03	Coventry Airport Group	WDC	GB
SG04	South of Kenilworth Group	WDC	GB
SG05	East of Lillington Group	WDC	GB
SG06	North of Leamington Group	WDC	GB
SG07	Wedgnock Park Farm Employment Group	WDC	GB
SG08	West of Warwick Group	WDC	Non-GB
SG09	South of Europa Way Group	WDC	Non-GB
SG10	Bishops Tachbrook Group	WDC	Non-GB
SG11	South East of Whitnash Group	WDC/SDC ²⁴	Non-GB
SG12	Southam Group	SDC	Non-GB
SG13	Gaydon Lighthorne Heath Group	SDC	Non-GB
SG14	East of Gaydon Group	SDC	Non-GB
SG15	North of Wellesbourne Group	SDC	Non-GB
SG16	South of Wellesbourne Group	SDC	Non-GB
SG17	Shipston-on-Stour Group	SDC	Non-GB
SG18	West of Stratford-Upon-Avon Group	SDC	Part GB part Non-GB ²⁵
SG19	East of Stratford-Upon-Avon Group	SDC	Non-GB
SG20	Bidford-on-Avon Group	SDC	Non-GB
SG21	Alcester Group	SDC	GB
SG22	West of Studley Group	SDC	GB
SG23	North of Henley-in-Arden Group	SDC	GB

²³ SG01 includes an area of land which was safeguarded and removed from the Green Belt in the 2017 Warwick District Local Plan, but the majority of the location is within the Green Belt designation.

²⁴ SG11 straddles the WDC / SDC border, but its position close to Whitnash and Leamington suggests that the area most likely to be developable is at its western end, which falls within WDC.

²⁵ SG18 includes areas north and east of the A46 which are in Green Belt, as well as areas outside the Green Belt.

Reference	Strategic Growth Location	District	Green Belt
SG24	Hockley Heath Group	WDC/SDC ²⁶	GB

The Preferred Options consultation confirmed the important role that New Settlements are intended to play within the South Warwickshire Local Plan, this is due to their capacity to provide access to employment opportunities and create more internalised trips through the 20-minute neighbourhood concept.

Unlike SGLs, New Settlements have been considered in relation to their proximity to rail stations, their site-specific constraints and in the case of Long Marston Airfield, rolled forward as an existing commitment in the adopted local plan, notwithstanding its location to the former Stratford-upon-Avon to Cheltenham railway, including the freight only branch to Honeybourne. The focus on connectivity to the rail network ensures overall compliance with the rail aspect of the Option 4: Sustainable Travel and Economy spatial growth strategy given that it subsumed Option 1: Rail Corridor within it through the hybridisation of different approaches.

The number of potential new settlement sites that were consulted on as part of preferred options increased to 12, as shown in Table 3-3 below:

Table 3-3 Potential New Settlement Locations assessed at Preferred Options Consultation

Reference	Potential New Settlement location	District	Green Belt
A1	Land south of Tanworth-in-Arden	SDC	GB
A2	Land east of Wood End	SDC	GB
B1	Land at Hatton	WDC	GB
C1	Land south of Kingswood	WDC	GB
E1	Land at Long Marston	SDC	Non-GB
F1	Land to the west of Ufton	SDC ²⁷	Non-GB
F2	Land south of Deppers Bridge	SDC	Non-GB
F3	Land north-east of Knightcote	SDC	Non-GB
G1	Land west of Knightcote	SDC	Non-GB
X1	Land south of Leamington / north of Wellesbourne / east of Barford	WDC ²⁸	Non-GB
X2	Land south of Leamington Spa / Whitnash and west of B4455 Fosse Way	WDC/SDC ²⁹	Non-GB

²⁶ SG24 is approximately evenly split between WDC and SDC.

²⁷ F1 lies wholly within SDC, but is adjacent to the WDC border.

²⁸ X1 lies wholly within WDC, but at its south eastern corner is adjacent to the SDC border.

²⁹ X2 straddles the WDC/SDC border, with the majority falling within WDC.

Reference	Potential New Settlement location	District	Green Belt
BW	Land at Bearley and Wilmcote	SDC	GB

The main concerns raised by respondents at Preferred Options were around infrastructure delivery, with deficiencies identified in the strategic road network to meet the type of growth proposed. Notably, there was now greater support for a dispersed approach as part of opposition raised to the proposed growth strategy than at earlier stages, often advanced as part of wider objections to the concentration of development at Strategic Growth Locations. Greater emphasis was placed on providing a balanced growth between different settlement types and locations.

New Settlement proposals were more generally supported; however, it was felt that these need meaningful safeguards to ensure appropriate delivery including binding infrastructure requirements. Another clear steer from the public was the need to ensure that the final growth strategy contained a clear brownfield-first sequential approach reflective of national policy. A further clear guiding steer from the Preferred Options consultation was that there needs to be a balance in the overall spatial growth strategy. This would see growth focused on brownfield land, new settlements and strategic growth locations, but with consideration of small-scale sites to meet deficits that arise to avoid the overallocation of strategic sites with associated impacts on infrastructure. These small-scale sites were initially identified as non-strategic sites, however these have been renamed Local Growth Locations for the purposes of the South Warwickshire Local Plan Publication version.

4 Technical Evidence Summary

This section of the report sets out how key pieces of evidence have been utilised within the refinement of the growth strategy. As noted in Section 3, the growth strategy provided an overarching list of preferred sites, however significant work has been required to ensure that right arrangement of capacities is in place for the new settlements and strategic growth locations. The key outcome of this process is that the greater the amount of strategic-scale growth that can be feasibly accommodated limits the amount of non-strategic growth that is required to support it and so ensures greater overarching conformity with the spatial principles of the sustainable travel and economy strategy. Therefore, this further point of site-specific capacity refinement plays a key role in informing the overall levels of growth from each component type.

4.1 Housing and Employment Land Availability Assessment (HELAA)

This topic paper should be read alongside The Housing and Economic Land Availability Assessment (HELAA).

The HELAA has been a fundamental component in developing the spatial growth strategy. It provided an initial sift to remove sites that would be unsuitable or unsustainable for either Strategic or Non-Strategic growth in principle, ensuring that only deliverable and developable sites proceeded to more detailed assessment for inclusion in the SWLP.

HELAA scores have played a key role in guiding site selections. For Strategic Growth Locations, a HELAA score of 57 or above was a significant indicator of the unsuitability of a site. Likewise, for Local Growth Locations, a HELAA score of 60 or above was considered sufficient to rule a site out from the site selection process.

These thresholds ensured that any fundamental constraints that presented irresolvable issues for sites were screened out of the process. This included heritage impacts, flood risk, ecological designations, and spatial considerations. This process ensures that the spatial growth strategy consists of sites that are available, suitable and achievable.

The HELAA has been updated support the Regulation 19 version of the South Warwickshire Local Plan, having identified some methodological inconsistencies in the Preferred Options version, as well as allowing for the assessment of additional sites. Full information regarding the HELAA Methodology, assessment criteria and individual site outcomes is provided in the evidence base of the South Warwickshire Local Plan.

4.2 Green Belt

The Green Belt has played two key roles in the site selection process, set out in two pieces of evidence. The Green Belt Topic Paper 2023³⁰ acted as starting point. This confirmed that there is not enough brownfield land available and initiated the Green Belt review. This has been

³⁰ South Warwickshire Councils (2023). The Green Belt in South Warwickshire: An introduction to the purposes of the Green Belt, and choosing sustainable locations for growth. Available at: <https://www.southwarwickshire.org.uk/doc/212392/name/The%20Green%20Belt%20in%20South%20Warwickshire.pdf>. Last Accessed: 20/05/2026

prepared in two parts. The Stage 1³¹ review utilised the position set out in the initial topic paper and provided a review of the role and function of the Green Belt in South Warwickshire to enable an assessment of whether exceptional circumstances existed to alter Green Belt boundaries through the local plan process.

The Stage 1 review provided a review of the performance of HELAA sites against the five purposes of the Green Belt set out in the NPPF. The Stage 2³² review was initially intended to consider certain sites in greater detail as the SWLP progressed, however following the publication of the NPPF 2024 the introduction of the grey belt designation had significant implications for South Warwickshire. The revised study therefore updated the designation of Warwick/Whitnash/Leamington to a Large Built-Up Area and considered existing Main Rural Centres, set out in the Stratford-on-Avon Core Strategy to act as towns. This meant the revised study updated the performance of sites against the different purposes of the Green Belt. It also provided guidance as to which sites are still Green Belt and which sites are now considered to be grey belt. This guidance was particularly important for the selection of Non-Strategic Sites, as sites in settlements that were grey belt rather than Green Belt were favourable considered when selecting the preferred list of sites.

The Regulation 19 South Warwickshire Local Plan has been supported by a Green Belt Exceptional Circumstances Topic Paper which sets out the council's position on exceptional circumstances justifying changes to Green Belt boundaries. The topic paper explains at length, why the option to pursue a non-Green Belt only strategy of development would have been inappropriate and why the release of land is justified, in compliance with NPPF Paragraph 145, 146, 147 and 148. This paper considered the role of Green Belt at a strategic level and is a key piece of information in understanding the development of the spatial growth strategy in relation to Green Belt land.

4.3 Transport

Transport considerations have been fed into the site selection process through the preparation of the South Warwickshire Local Plan. Access arrangements were provided to Warwickshire County Council, and their transport consultants SLR in September 2025. Whilst there have been issues identified at a range of sites, this is a matter that the South Warwickshire Councils are continuing to work through with promoters, and it is expected that updated arrangements will be able to resolve identified issues which are still outstanding. It is also expected that the preferred sites will become more detailed with their development proposals to allow a more detailed review of proposals. Ongoing engagement with promoters will set out matters of agreement and disagreement in through Statements of Common Ground.

³¹ Arup (2024). Green Belt Review Stage 1. Available at: <https://www.southwarwickshire.org.uk/doc/213163/name/South%20Warwickshire%20Green%20Belt%20Review%20Stage%201%20Report%20Final%20Report%20and%20Appendix%201%206%20low%20res.pdf>. Last Accessed: 18/03/2026

³²Arup (2026) Green Belt Review 2: Green Belt Site Assessments. Available at: [South Warwickshire Green Belt Review - Stage 2 Report Final Issue - including all appendices.pdf](#). (Accessed: 20.05.2026)

The key output from the transport work has been the Strategic Transport Assessment (STA)³³, which has been informed by technical review of the sites. The preferred options consultation was supported by the South Warwickshire Local Plan High Level Transport assessment³⁴ which provided an initial position regarding option identification and trip generation to deliver the spatial growth strategy. This has been updated and refreshed by the STA which has carried out detailed modelling to inform the strategic infrastructure requirements for development proposals. These requirements have been inputted into the IDP and will mitigate harm arising from strategic development or non-strategic development in accumulation. The STA establishes a starting point for access arrangements for each Strategic Growth Location and New Settlement, as well as highway schemes required to mitigate the predevelopment proposals.

It is accepted that the delivery of the South Warwickshire Local Plan has several critical infrastructure challenges that relate to the transport network. Most notably the need for a new M40 junction to support SG09 and SG10 at Bishop's Tachbrook and the delivery of the Stratford South Western Relief Road (otherwise known as the Stratford-upon-Avon bypass) to deliver the LMA New Settlement.

4.4 Stratford-upon-Avon Longer Term Highway Capacity Study

The Stratford Upon Avon Longer Term Highway Capacity Study 2025³⁵ confirmed the feasibility of a Stratford-upon-Avon Bypass. This is a key piece of supporting information that has confirmed the preferred spatial approach to development at SDC.

Stratford-upon-Avon has recognised highway capacity constraints, which restrict the ability of the strategic and local road network around the town to accommodate additional traffic. This has acted as a key constraint to growth south of the town historically and been a long-term barrier to sustainable growth.

The adopted Stratford-upon-Avon Core Strategy recognised the need for a relief road to deliver more than 400 homes at the Long Marston Airfield (LMA) new settlement. This has not been delivered in the current plan period and delivery at LMA has stalled. For LMA to continue its role as an allocation in the SWLP, demonstrating a credible and deliverable route for the relief road is a key element of the spatial growth strategy. This requirement necessitated a preferred list of sites which included a relief road solution.

The 2025 study identified the preferred approach as being via a western corridor running from the A46/West of Shottery Relief Road in the north to the Campden Road (B4632) in the south.

³³ SLR Consulting and Warwickshire County Council (2026). Strategic Transport Assessment: Strategic Growth Location Sites & Mitigation Schemes. Available at: <https://www.southwarwickshire.org.uk/doc/214570/name/STA%20SGL%20Sites%20and%20Mitigation%20Schemes%20Overview.pdf>. (Accessed: 20/05/2026)

³⁴ Jacobs on behalf of WCC (August 2024), *South Warwickshire Local Plan High Level Transport Assessment*. Available at [SWLP High Level Transport Assessment v9.pdf](#) (Accessed 16/12/2024).

³⁵ AtkinsRealis (2026). Stratford-Upon-Avon Longer Term Highway Capacity Study. Available at: <https://www.southwarwickshire.org.uk/doc/214308/name/Draft%20Delivery%20Strategy%20and%20Cost%20Refinement.pdf>. (Accessed 18/03/2026)

This would then connect over the River Avon to the Evesham Road (B439), to provide relief to pressure on existing routes through the town.

The estimated cost of this scheme is between £170-630 million, depending on the opening year and final design specification, having adjusted for inflation. Ongoing discussions are occurring with Homes England to enable grant funding to deliver the relief road, with other long term funding options also being explored including with other strategic partners. Ensuring that a viable funding strategy is in place for this infrastructure is essential to unlock housing delivery at LMA and deliver the broader spatial growth strategy for South Warwickshire.

4.5 Landscape

A Landscape Sensitivity Assessment³⁶ has been prepared which assesses the landscape sensitivity of strategic sites for development under their proposed uses.

None of the strategic sites were identified as having high levels of landscape harm. Notwithstanding this, the LSA identifies a series of design requirements that are to be fed into the masterplanning process to limit landscape harm. This includes being in keeping with settlement form, avoiding higher ground, retaining tree cover, forming coherent green infrastructure networks, enhancing locally important habitats, maintaining priority habitats, retaining and enhancing key landscape features, encouraging woodland planting, retaining field patterns where possible, relating well to existing settlement patterns, using traditional materials, enhancing recreation resources to provide public enjoyment, respecting existing topography, integrating fencing with landforms and ensuring that light spill is minimised.

4.6 Climate Change

Climate change modelling has played a role at two points within the development of the spatial growth strategy. Firstly, each of the growth strategy options and new settlement locations at Issues and Options were analysed by Arup³⁷, with a summary of their potential emissions provided in the Issues and Options consultation document³⁸. This modelling confirmed that the Sustainable Travel & Economy growth option resulted in the lower final annual emissions in 2050 compared to alternative options, whilst the Dispersed option had the highest emissions amongst the other options.

Following confirmation of an initial preferred list of sites in the autumn of 2025, these were provided to Bioregional, to assess the carbon emissions for sites to compare the performance of specific sites using transport models provided by Space Syntax. This further work identified

³⁶ South Warwickshire Landscape Sensitivity Assessment (2026). Strategic Growth Locations and New Settlements. Available at: <https://www.southwarwickshire.org.uk/doc/214537/name/South%20Warwickshire%20Landscape%20Sensitivity%20Assessment%20SGLs%20%26%20NS.pdf>. (Accessed: 20/05/2026)

³⁷ Arup (2022). South Warwickshire Local Plan: Estimate of emissions for proposed growth options and new settlements. Available at: <https://www.southwarwickshire.org.uk/doc/211514/name/Climate%20Change%20Emissions%20Assessment.pdf>. Last accessed: 18/03/2026

³⁸ South Warwickshire Councils (2023). South Warwickshire Local Plan Part 1: Stage 2 – Issues and Options Consultation. Available at: <https://www.southwarwickshire.org.uk/doc/211702/name/WEB%20J26939%20SWP%20Issues%20and%20Options%20Consultation%20JAN%202023.pdf>. Last accessed: 16/03/2026

issues around some sites which were identified as causing high number of emissions. As most of these emissions are through private car trips, they are hard to mitigate in full, beyond the expectation of the decarbonisation of the road network during the plan period. Indeed, the study located that Transport Emissions are “driven by two sites B1 and E1. Both sites B1 and E1 are located within LSOAs with lower levels of transport integration compared to the South Warwickshire average. However, it should also be noted that B1 and E1 have the largest number of housing units at 4,000 and 4,500 dwellings respectively, which compounds the cumulative carbon emissions associated with these sites”.

Given that the growth proposed in the South Warwickshire Local Plan would be expected to come forward in any case via speculative planning applications in an unplanned manner, the carbon impacts of transport emissions was not used to rule out specific sites given the wider benefits that delivery offered in terms of other measures of sustainability, especially at New Settlements by delivering 20 minute neighbourhoods.

4.7 Site-Wide Masterplanning

A review of masterplans submitted by site promoters to the Councils has been carried out by AECOM. This has tested the assumptions which informed the masterplans and provided updated versions that respond to their understanding of constraints and infrastructure requirements. These are available on the Technical Evidence page of the South Warwickshire Local Plan Website. These masterplans will inform the infrastructure requirements for the SWLP and form alongside Infrastructure Delivery Schedule provided in the Infrastructure Delivery Plan Part 2. These masterplans will act as the basis for developers to prepare site-wide masterplans of the submission of any planning application which will need to be agreed upon with the council. They do not have the same level detail as an illustrative or indicative masterplan and should not be treated as such.

When preparing these Masterplans, AECOM reviewed capacity assumptions, applying a 40 dwelling per hectare density to 80% of the net mixed-use developable area having accounted for constraints. In some cases, this has reduced some site capacity assumptions from the promoter submissions for the Regulation 19 SWLP. These figures are minimum figures, and a starting point. It is understood that in many cases, promoters may feel that the capacity could be higher, and if this can be demonstrated as deliverable and achievable through the local plan examination process then there may be scope to increase this capacity, and in doing so the overall reliance on strategic sites within the SWLP. In other cases, the AECOM figures have provided a higher figure than that used in the SWLP. In a similar vein, it has been felt appropriate to use the more conservative available figures as minimums, subject to further work to explore whether higher capacities may be achievable on these sites.

Finally, based on planning judgement of reviews of developer submissions, in some cases it was felt that sites would could deliver a higher capacity provided there was credible evidence that higher delivery would be achievable. This was most typically the case on Employment Sites where the density assumptions used by Icenl were used when calculating the land that would come forward, this already accounted for plot ratios.

4.8 Viability

The Whole Plan Viability Assessment prepared by Aspinall Verdi identifies the viability impacts

of the emerging local plan, providing an assessment of the viability of both draft policies and the preferred sites in the local plan. This includes assessment of cumulative impact of emerging policies on future development proposals in the plan period. The assessment confirms the deliverability of the strategic site allocations that are due to be provided over the plan period, subject to their ability to provide appropriate contributions to deliver the necessary infrastructure.

The viability assessment is not a pass/fail test for a Local Plan but is there to ensure that the policies and allocations contained within the plan are realistic, and that the total cumulative cost will not undermine the deliverability of the plan. The focus of the viability assessment is not on a particular site, but on whether the plan likely to be deliverable. There will be further engagement following its outcome, and engagement to external stakeholders to assess the availability of external funding as appropriate.

4.9 Strategic Flood Risk Assessment (SFRA)

The Strategic Flood Risk Assessment (SFRA) provides a review of flood risk across both districts. Level 1 SFRA was prepared for both Warwick and Stratford-on-Avon District independently in 2022, to inform the plan making process.

The SFRA Level 1 identified that the primary fluvial flood risk in both districts relates to the River Avon and its main tributaries. In Warwick District this refers to the River Leam at Royal Lemington Spa and Finham Brook at Kenilworth. In Stratford-on-Avon District, the risk is acute at Stratford-on-Avon and Bidford-on-Avon. The River Arrow also presents Flood Risk at Alcester and the River Stow presents flood risk at Southam. There is also risk of surface water and ground water flood risk in certain areas.

Paragraph 172 of the NPPF requires plan making authorities to apply a sequential, risk-based approach to the location of development when preparing local plans. This means considering all sources of flood risk and the current and future impacts of climate change. To do this, plan making authorities should apply the sequential test, and where necessary the exception test, safeguard land for flood management, use opportunities arising from development to reduce flood risk, and where appropriate direct development away from areas at highest risk.

The preparation of the South Warwickshire Local Plan has had regard to these requirements throughout. The Level 1 SFRA confirmed that when allocating land, consideration must be given to the cumulative impact of floodplain loss, which can increase flood risk downstream. It also confirms that given the distribution of watercourses across the area, it is not possible to avoid all of these areas entirely.

This is because it is inevitable that some areas of New Settlements and Strategic Growth Locations encroach in areas identified as being at risk of flooding given their size and scale; namely areas of Flood Zone 2 and 3. It is expected that given their scale, they may be able to mitigate this through areas of public open space, utilising Sustainable Urban Drainage Systems. However, this issue is more acute for some non-strategic sites (Local Growth Locations) given their typically smaller scale. As set out in Annex A – Local Growth Locations, one of the starting points of the Long-list-to-Short-List element of the process was the utilisation of HELAA to site suitability, with sites over a score of 60, or subject to a combination of HELAA constraints sufficient to rule a site out. Fluvial and Surface Water Flood Risk played a key role here and has

ensured that there are limited number of sites have come forward with levels of flood risk that can't be mitigated. The Level 2 SFRA refines this process further by providing a detailed review for sites are risk of flooding, confirming how these can be mitigated. It confirms that all the sites assessed would pass the flood risk elements of the exception test through well designed schemes. It should be noted that consideration of Flood Risk has played a key when AECOM have prepared concept masterplans for strategic sites, and so indicative developable areas do account for this.

4.9 Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

This topic paper should be read alongside the findings of the Sustainability Appraisal. As part of preparing the Local Plan, the sustainability of site selection has been assessed through the Sustainability Appraisal (SA). The SA provides a review of the social, economic and environmental sustainability of the sites and policies in the SWLP and the proposes mitigations as required. The SA is a legal requirement under the Planning and Compulsory Purchase Act 2004 and the SEA Directive.

Each previous consultation phase of the SWLP has been subject to an SA, ensuring that decisions that have informed the spatial strategy have been underpinned by the consideration of the overall sustainability of options. A key consideration for the SA is reasonable alternatives.

The SA assessed all development proposals and options against the following criteria, which align with the strategic objectives of the SWLP, which inherently underpin the spatial growth strategy as sustainability considerations:

1. Climate change: Reducing the Councils contribution towards the causes of climate change and adapt to the anticipated effects of climate changes
2. Flood risk: Reduce and plan for flood risk including anticipated levels as a result of climate change
3. Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.
4. Landscape: Conserve, enhance and manage the quality and character of landscape and townscapes
5. Cultural Heritage: Conserve and enhance the historic environment in a n appropriate manner to the significance of heritage assets and their setting
6. Pollution: Reduce pollution and mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution
7. Natural resources: Protect and conserve natural resources including soil, water and minerals.
8. Waste: Reduce waste generation and disposal and support sustainable management of waste.
9. Housing: Provide affordable, high quality and environmentally sound housing for all.
10. Health: Safeguard and improve community health, safety and wellbeing.
11. Accessibility: Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.
12. Education: Increase access to education improve attainment to develop and maintain a skilled workforce

13. Economy: Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.

The Issues and Options Sustainability Appraisal reviewed the five spatial growth options: Rail Corridors, Sustainable Travel, Economy, Sustainable Travel and Economy and Dispersed. The approaches Economy, and Sustainable Travel and Economy were both considered to be the most sustainable overall spatial growth options³⁹.

The Preferred Options Sustainability Appraisal⁴⁰ provided a review of the long-list of strategic sites and new settlements, which collectively act as reasonable alternatives for strategic selection, excluding the sites that have now been finalised into the preferred list of strategic sites. It should be noted that the consideration of these locations did not consider site-specific masterplans that have been developed in the intervening period since the Preferred Options consultation.

The Regulation-19 Sustainability Appraisal⁴¹ assesses the proposed site allocations included in the local plan, having accounted for mitigation. It sets out some residual positive effects, most notably enhancing the ecological network, addressing flood risk, protecting and enhancing multi-functional green infrastructure, the provision of public greenspace and active travel opportunities, the provision of new homes and the provision of employment opportunities that would occur because of the preferred spatial growth strategy. It also confirms that the mitigation proposed provides positive mitigation planning mechanisms for delivering sustainable development.

However, the Regulation 19 Sustainability Appraisal also identified a residual adverse effect. These were increased generation of, and exposure to, air pollution, threats or pressures to biodiversity designations, increased greenhouse gas emissions, alteration of character or setting or heritage assets and historic landscapes, sustainable access to healthcare and leisure facilities, alteration of landscape character and sensitive/locally distinctive landscapes, sustainable access to services and facilities, waste generation, loss of soil resources, reduction in water quality and increased demand on water resources.

It should be noted that several of the identified effects are subject to varying degrees of uncertainty with their ultimate significance dependent on the effectiveness of implementation, monitoring and adaptive mitigation over time. In some cases, there is the potential for identified residual adverse effects to be reduced for longer-term positive outcomes.

³⁹ Lepus Consulting (2022). Sustainability Appraisal of the South Warwickshire Local Plan: Regulation 18: Issues and Options Stage. Available at: <https://www.southwarwickshire.org.uk/doc/211520/name/SA%20Main%20Report.pdf>. (Accessed: 21/05/2026)

⁴⁰ Lepus Consulting (2024). Sustainability Appraisal of the South Warwickshire Local Plan. Regulation 18: Preferred Options Stage. Available at: <https://www.southwarwickshire.org.uk/doc/213249/name/Final%20SA%20Regulation%2018%20Report.pdf>. (Accessed 21.02.2026)

⁴¹ Lepus Consulting (2026) Draft Sustainability Appraisal of the South Warwickshire Local Plan: Regulation 19 Stage. Available at: <https://www.southwarwickshire.org.uk/doc/214566/name/LC%201421%20Vol%202of3%20Reg19%20A%20South%20Warks%206%20150526LB.pdf>. (Accessed 21.02.2026)

In general, where the SA has identified negative impacts for sites, these are considered to have been outweighed by the benefits of the housing provision when taken against the reasonable alternatives provided as part of the review. Where applicable, Annexe C- Strategic Site Selection Rationale considers the site-specific implications of the SA.

5 Engagement

5.1 Ward Members

Ward member engagement has played a key role in the site selection process. Following the preferred options consultation, a series of meetings were carried out with the Ward Member Advisory Group, presenting the refinement process of the growth strategy, with feedback provided on key decisions regarding the reduction in the number of potential new settlements, and the preferred list of Strategic Growth Locations.

Following the refinement of the selection of sites, a series of ward member briefings occurred. This allowed ward members for a particular area to give feedback regarding potential allocations and make officers aware of any local intelligence regarding sites and potential issues that may not have been considered fully in the HELAA, or elsewhere in the SWLP evidence base.

Following these meetings, the sites were presented more generally to elected members through a series of member workshops in December 2025 and March/April 2026. One of the key pieces of feedback from the initial ward member sessions was that it was difficult to understand the sites in isolation, as from the perspective of a local ward members each strategic site in their local area was understandably regarded as problematic, so further engagement ensured that there was a more holistic understanding of the growth strategy, with shared characteristics between different strategic sites. At the time of these sessions the growth strategy was still dependent on the decision-making regarding the Stratford Southwestern Relief Road (SSWRR) otherwise known as the Stratford-upon-Avon bypass. These meetings also provided members with the opportunity to feedback on the initial preferred list of the Batch 1 Non-Strategic Sites.

A key outcome of these meetings and further engagement with council leadership was refinement of site capacities. It was clear that members required greater amounts of delivery on key strategic sites, most notably new settlements, to consider the spatial growth strategy to be effective.

Throughout the preparation of the South Warwickshire Local Plan there has ultimately been concern raised about the amount of development proposed. A clear and consistent concern raised by members has also been regarding the need to avoid the dispersed approach to development which mirrors what is currently being experienced as a development strategy, in part due to both Council's lacking a five-year housing land supply. The preparation of the South Warwickshire Local Plan has been required to respond to changes in national policy including the introduction of the standard method which has dramatically increased the amount of housing required to be delivered by the SWLP. The preferred list of sites is the best available option to deliver sustainable growth in the fewest number of locations, with the spatial growth strategy delivering growth in a manner that is substantially more appropriate than through unplanned mechanisms via speculative planning applications.

5.2 Stakeholders

Stakeholder engagement with providers also informed the emerging spatial growth strategy, helping to ensure that options are deliverable and aligned with identified infrastructure constraints and priorities. Engagement with stakeholders has informed the spatial growth strategy both through responses to the Preferred Options consultation, and then through targeted discussions with key stakeholders where there was a clear implication for site selection and distribution of growth based on the feedback received.

Of particular importance was further engagement with various teams at Warwickshire County Council (WCC), including the Highways Team and Infrastructure Delivery Team. Discussions with the Highways Team informed the preparation of the Strategic Transport Assessment and helped to establish the baseline for the site selection. A key conclusion of this work was that in terms of strategic infrastructure, the requirements were likely to be similar regardless of the overall mix of sites, with identified capacity constraints along the A46, including at Stank's Island, Junction 13/14 and Junction 15 of the M40, and within and around Stratford-upon-Avon. This highlighted the importance of a strategic approach to mitigation at a plan-wide level rather than being overly reliant on isolated site-specific interventions.

In terms of broader strategic infrastructure one of the main concerns has been regarding education provision particularly at the secondary level, with identified issues in capacity at Stratford-upon-Avon, Southam, Kineton, North Leamington and South of Coventry. These discussions have influenced the site selection of the preferred growth strategy, as it made clear the importance of ensuring that the scale and location of growth created opportunities to expand or deliver new education provision, either as part of strategic allocations or through developer contributions to nearby schools. The preferred growth strategy is considered to optimal way to resolve these issues, though in some cases discussions are ongoing to resolve outstanding matters.

Other key stakeholders include utilities providers such as Severn Trent, the National Grid, the National Energy System Operator, and statutory consultees such as National Highways, Sport England. This has allowed for consideration of their respective technical standards, investment strategies and preferred delivery process. This has helped to ensure that growth options take account of the need for timely provision of supporting infrastructure.

This had been fed into the Infrastructure Delivery Plan (IDP), which provides the primary mechanism for coordinating infrastructure provision alongside development. Development proposals in the SWLP will be required to have regard to the IDP, ensuring that the preferred spatial growth strategy is supported by appropriate and deliverable infrastructure provision.

5.3 Residents and Businesses

As noted in section 3 of this report, residents have been given ample opportunity to provide comment and feedback to the development of the spatial strategy at previous rounds of consultation and played a pivotal role in decision to utilise the hybrid Sustainable Travel and Economy as the preferred approach to the growth strategy. Engagement with South Warwickshire's communities regarding the emerging spatial growth strategy set out in the Regulation 19 document is a key priority for the forthcoming consultation and a series of sessions will be held to communicate what is proposed and receive feedback.

Regular engagement has also been undertaken with business representative groups including Shakespeare's England Destination Management Organisation, both the Leamington and Stratford-upon-Avon Business Improvement Districts, Coventry and Warwickshire Chamber of Commerce, and Warwickshire County Council Business Growth Service.

5.4 Site Promoters

Engagement with site promoters was the starting point for the site selection process in the Local Plan, through submission to call-for-sites at the Scoping Consultation and Issues and Options Consultation. Further submissions have been accepted where applicable, typically for revisions or additional land in the vicinity of New Settlements and Strategic Growth Locations.

In September 2025, strategic site promoters were invited to provide updated evidence to the Councils. Many of the initial call for sites submissions lacked detail and were often simple red line boundaries. It was important to understand whether there were genuine developer interest and a willingness to engage in joint working where applicable on sites of strategic scale. This also gave promoters an opportunity to take initial steps to resolve technical issues which were becoming identified through engagement Ward Members, Stakeholders and Residents.

5.5 Neighbouring Local Authorities

Please see Section 2.4 of this report as well as the accompanying Maintaining effective Co-operation Compliance Statement for further details regarding the engagement with neighbouring local authorities in respect of the SWLP.

6 Refining the Growth Strategy

6.1 Overview

Refining the growth strategy has entailed moving from the range of potential sites presented at the Preferred Options stage to a single preferred option that meets the development requirements for South Warwickshire to 2050. Decisions about which sites to include have been informed by the outputs of the various technical studies and the site masterplanning work which has identified technical planning constraints and adjusted site capacities relative to developer submissions.

The starting point for the spatial growth strategy refinement was the need to be compliant with the objectives of the NPPF. These guiding principles have played a key role in directing growth within the Sustainable Travel and Economy spatial growth strategy:

- First utilising available urban brownfield land (NPPF 2024 Paragraph 124)
- Where greenfield development is needed, concentrating this into fewer, larger areas of strategic growth (NPPF 2024 Paragraph 77).
- Using locations that are within reach of existing facilities or providing new facilities on sites (NPPF 2024 Paragraph 77b)
- Considering the potential for one or more new settlements (NPPF 2024 Paragraph 77)
- Allowing for small-scale growth outside of strategic areas (NPPF 2024 paragraph 73.a)
- Building at densities that make efficient use of land (NPPF 2024 Paragraph 129)

The refinement of the spatial growth strategy to inform site selection used the guiding principles to move from a broad set of locations towards a preferred list of sites that provided a deliverable and balanced pattern of growth to meet South Warwickshire's housing and employment requirements over the plan period.

A key consideration throughout the refinement process was the need to complement larger strategic growth locations and new settlements with a proportion of smaller sites. This reflects national policy requirements for at least 10% of housing to be delivered on sites of 1ha or below, as well as the practical necessity of maintaining a five-year housing land supply in the earlier years of the plan period. Smaller sites are generally considered to be more deliverable (although not necessarily more sustainable) than larger strategic allocations and so are vital in ensuring housing delivery during the early stages of the plan period. This is also particularly pertinent at present when the latest calculations show that neither Council can demonstrate a 5 year housing land supply.⁴²

A further key element of the refinement process has been a review of build out assumptions⁴³, which confirmed the importance of smaller-scale allocations. This also informed the site selection mix of strategic allocations by providing realistic assumptions of plan-period capacity.

⁴² [Warwick District Council \(2025\) Housing trajectory and 5 year land supply](#) and [Stratford District Council \(March 2025\) 5 year housing land supply](#)

⁴³ This review will be presented in a further Housing Topic Paper to be prepared ahead of the Submission stage

Therefore, as part of the refinement process, a distinction was made between larger Strategic Growth Locations versus generally smaller 'non-strategic' Local Growth Locations. New Settlements are also a type of a strategic growth. In some cases, it is recognised that Strategic Growth Locations amount to a smaller amount of overall development than the cumulative amount of Local Growth Locations at a settlement. Development in the South Warwickshire Local Plan has not been allocated in accordance with a settlement hierarchy, but through identified beneficial characteristics via the priority area buffers, and consideration of constraints. Strategic Growth Locations, in part, refers to how Strategic Sites came forward through the various Call for Sites exercises, where opportunities were identified for co-ordinated growth and a comprehensive approach as opposed to smaller, often more separate Local Growth Locations. There is subsequently the expectation that Strategic Growth Locations, in line with the spatial role, will provide more infrastructure for existing settlements as they come forward, whereas Local Growth Locations will be more reliant on existing infrastructure. However, future planning applications for Local Growth Locations will still have to be in accordance with the requirements of the South Warwickshire Local Plan with regards to infrastructure and be consulted on with Statutory Consultees and other stakeholders, who will set out appropriate infrastructure requirements at that time.

In terms of the strategic locations, the initial long list of locations was reviewed against various technical studies seen to be initial key determinants of deliverability, including:

- Housing and Economic Land Availability Assessment (HELAA);
- Initial transport modelling outputs;
- Education capacity assessments; and
- Reviews of developer interest.

As a result of this review, several locations were not taken forward for further refinement where there were clear issues that affected their deliverability, where there was not considered to be sufficient developer interest, or where they were not considered to align with the emerging spatial framework, when considered holistically.

A series of thematic scenarios were then prepared to explore the different ways of distributing strategic growth. These scenarios applied a range of filters and policy priorities derived from the Sustainable Travel and Economy spatial growth strategy and national policy. These included:

- Focusing growth outside of the Green Belt, with consideration of whether the growth strategy could be supported by a bypass to Stratford-upon-Avon.
- Prioritising locations that performed well in the HELAA with a score of less than 47.
- Concentrating growth along key travel corridors through either rail stations or along the broad North- South Corridor through South Warwickshire.
- Reinforcing the role of larger existing urban settlements with a population of greater than 10,000.
- Using sites where new housing was proposed alongside employment land to integrate between the two effectively.

No single scenario, when considered in isolation, was capable of producing a sustainable and deliverable pattern of growth across the plan area. Each individual scenario either failed to meet

the overall scale of growth required, relied too heavily on major infrastructure, created an imbalance of growth between the two districts or would clearly lack support from statutory consultees and key 'Duty-to-Cooperate' bodies.

Accordingly, the final refined strategy adopts a combined approach drawing on the strengths of multiple thematic scenarios to produce a scenario that optimised the strengths of the spatial growth strategy. This enables the preferred growth strategy to maximise sustainability, deliverability and infrastructure provision. However, throughout the refinement process a large degree of flexibility was retained to respond rapidly to feedback from further consultation with stakeholders such as elected members and statutory consultees. A key additional consideration has been the deliverability of critical enabling pieces of infrastructure.

As the refinement progressed, further evidence became available, most notably updates to transport modelling, and greater clarity was gained regarding the deliverability of infrastructure, for instance the Stratford-upon-Avon Bypass. This enabled the strategy to progress from a range of conditional scenarios towards a single overarching approach capable of meeting the required levels of housing and employment provision in a sustainable and deliverable manner. This emerging strategy was then considered against a range of technical evidence (see Section 4 above).

The outcome of the refinement process is a preferred list of strategic sites that apply the principles of the spatial growth strategy identified at Preferred Options. These are set out within Policy DS.2 of the SWLP itself with Policy DS.3 demonstrating how the various housing, employment and gypsy and traveller needs are met. The preferred approach focuses development at New Settlements and at a small number of existing settlements through Strategic Growth Locations, informed by SWLP Policy DS.4 Strategic Site Principles. These locations are consistent with the Priority Areas identified at Preferred Options.

Elsewhere smaller scale development is provided at Local Growth Locations (non-strategic growth) through SWLP Policies DS.5, DS.6 and DS.7 to ensure that both Councils demonstrate a five-year housing land supply, preventing over reliance on strategic scale housing growth. Local Growth Locations consist of a mixture of non-strategic residential, retail and employment sites, mixed-use, town centre, community and leisure sites, and other allocations, such as sites that are allocated within previous local and neighbourhood plans, which have been carried over into the SWLP.

To provide clarity and certainty to both communities and developers, SWLP Policy DS.8 identifies those existing settlements where windfall sites will be supported. This ensures that development proposals come forward within the built-up-area boundaries, at a scale in accordance with their role and function and provide flexibility to support additional growth in sustainable locations across the plan period. Outside of the built-up area boundaries, SWLP Policies DS.11 and DS.12 provide a further framework for supporting additional development appropriate to more rural locations.

SWLP Policy DS.10 Major Investment Sites safeguards land for employment alongside the site allocations made for additional employment land in policy DS.5. This policy supports the spatial growth strategy by ensuring that there is a sufficient amount and range of employment land retained in the Local Plan area. It sets out a range of sites that are to be retained, protected and enhanced throughout the plan period.

The spatial growth strategy is underpinned by the principles set out in national policy which informed its refinement. This sees the prioritisation of the development of brownfield land, utilising fewer, larger areas of strategic land to deliver the necessary infrastructure as required. Likewise, there is a focus on utilising efficient densities, 20-minute neighbourhoods and the promotion of active travel. The vast majority of housing and employment need is being met on strategic allocations to help deliver infrastructure. When refining the spatial growth strategy, the general goal has been to limit the number of sites bought forward but balancing this with the need for the plan to be deliverable and offer an appropriate mix of housing sites.

To inform site capacities, the masterplans provided by promoters for new settlements and strategic growth locations have been reviewed by AECOM, with indicative capacities and infrastructure costs arising from their review. These have been used to inform the capacity of all strategic sites for the purposes of the SWLP, however in some cases these have been amended to account for additional intelligence provided by officers or site promoters. To ensure further flexibility, the housing and employment numbers expected to be delivered by allocations contained within the SWLP are typically expressed as minimums.

This topic paper has been supplemented with a series of Annexes which provide detailed explanations regarding specific elements of the refinement of the Spatial Growth Strategy:

- Annexe A – Local Growth Locations Site Selection Methodology explains the methodology and rationale behind the selection for Local Growth Locations also known as non-strategic sites.
- Annexe B – Employment Growth Detailed Review – provides an extensive justification of the refinement of the growth strategy but purely focused on the delivery of employment sites which contains some exceptions to the wider preparation of the spatial growth strategy due to the nature of employment need, especially in relation to the separate definitions of strategic and non-strategic employment growth.
- Annexe C - Strategic Site Selection Rationale - considers the justification for the selection and refinements of New Settlements and Strategic Growth Locations on a site-by-site basis.

In addition, consideration should also be given to the Green Belt Exceptional Circumstances Topic Paper which considers how the spatial growth strategy accords with national policy regarding Green Belt, which also had a key role in its refinement.

6.2 New Settlements

New Settlements are the focal point of development proposals in the South Warwickshire Local Plan. They will deliver a significant portion of the housing development required in the period 2050. The benefit of New Settlements is their capacity to leverage the delivery of greater amounts of infrastructure to be more sustainable, in that they lead to less demand on existing infrastructure facilities used by residents. However, New Settlements also have challenges, given their scale, they can be hard to deliver and require significant lead in times and front loading in terms of infrastructure delivery.

New Settlements were first identified at Issues and Options, subsequently followed by a long list of 12 potential locations provided at Preferred Options. Post Preferred Options, and in response to the results of the consultation and the associated Call for Sites exercise, five

locations were the subject of more detailed consideration including a late addition of A3: Danzey which bought forward newly available pieces of land alongside the areas of A1/A2. It should also be noted that proposal reference X2 was deleted as a standalone new settlement and reconsidered as a Strategic Growth Location – SG11.

Table 6-1 New Settlement Options Removed After Preferred Options

New settlement options at Preferred Options	Key considerations
A1: Land south of Tanworth in Arden	<ul style="list-style-type: none"> Insufficient development interest to explore location alone. Consider scope to explore land to the east of A1 and south of A2 to identify any significant development interest
A2: Land east of Wood End	<ul style="list-style-type: none"> Insufficient development interest to explore location alone. Consider scope to explore land to the east of A1 and south of A2 to identify any significant development interest.
F1: Land west of Ufton	<ul style="list-style-type: none"> Discounted due to lack of developer interest.
F2 : Land south of Deppers Bridge	<ul style="list-style-type: none"> Discounted due to lack of developer interest.
F3: Land north-east of Knightcote	<ul style="list-style-type: none"> Discounted due to lack of developer interest. Initial discussions with transport infrastructure providers indicated the improbability of a new rail station being provided at the location and constraints with main road access.
G1:Land west of Knightcote	<ul style="list-style-type: none"> Insufficient developer interest as a new settlement. Reconsidered with wider area notably SG14.
X1: Land south of Leamington Spa/north of Wellesbourne/east of Barford	<ul style="list-style-type: none"> Discounted due to lack of development interest.
X2: Land south of Leamington Spa/Whitnash and west of B4455 Fosse Way	<ul style="list-style-type: none"> Significant developer interest, however, was based on parcels being promoted individually, rather than as a new settlement. Given its proximity to Leamington and Whitnash, it was considered more appropriate for the site to be explored in consideration with SG11 as a strategic growth location. Discounted as a new settlement.

Of the five remaining potential locations, Land at Long Marston and Land at Hatton have emerged as the preferred locations for New Settlements. Table 6.2 summarises the rationale for discounting proposals at Bearley/Wilmcote, Danzey and Kingswood. These sites were considered as potential contingency options late into plan-making process and were considered at length, with initial detailed modelling and consideration of constraints carried out, reflective of the potential sustainability of the sites.

Table 6-2 Summary of New Settlement Locations subject to further consideration post-Preferred Options

New Settlement Options at Preferred Options	Key considerations	Allocated in SWLP Reg 19? (Y/N)	SWLP Reg 19 Ref
A3: Land at Danzey	Isolated location that would be predominantly located at some distance from existing settlements in Warwick/Stratford. Local Road Network in the area is rural, in many cases comprising narrow single track country lanes and would require significant upgrades. Concern about both cumulative impact on M40 Junction 16 alongside development proposals north of Henley, plus the need for significant upgrades to the existing junction as there is no access southbound or exit for northbound traffic. Not supported by WCC with regard to impact on the Local Road Network.	N	
B1: Land at Hatton	Better availability as under the control of single landowner, with implications for deliverability. Promoters have engaged well with the plan-making process and have shown a clear willingness to develop. Development offers opportunity to further improve capacity to rail services between Leamington Spa and Birmingham Moor Street as additional benefit.	Y	HAT
C1: Land south of Kingswood	Potential site currently in multiple land ownership, with no clear vehicle for joint working. Development proposals could potentially require a new M40 junction, with no obviously available funding mechanism identified to deliver it.	N	
E1: Long Marston Airfield	Key component of the Spatial Growth Strategy. Existing commitment from the Stratford-upon-Avon Core Strategy, site is clearly, and demonstrably available given existing development on-site, which would allow for increased build out rates. Development proposal requires funding of delivery of Stratford South Western Relief Road (SWRR). This would provide a transport solution to unlock development south of the town over the plan period	Y	LMA
BW: Land at Bearley and Wilmcote	Proximity to Stratford-Upon-Avon unfavourable, with clear impacts on Local Road Network. Concern raised that development would effectively act as a large urban extension to the town, rather than a new settlement in its own right. Prominent landscape concerns. Preferred approach to bring forward a range of smaller Strategic Growth Locations in the vicinity of Stratford-upon-Avon to mitigate harms more effectively.	N	

In order for both Councils to meet their respective housing requirement, it has been considered necessary for both New Settlements to be allocated in Stratford-upon-Avon District and Warwick. In that sense Long Marston and Hatton are considered to be the best available options in their respective districts.

It is recognised that given their scale, the New Settlements at Long Marston and Hatton will see delivery outside of the plan period to 2050. Long Marston is considered to have a capacity of 10,207 dwellings alongside 15ha of non-strategic employment, of these 5,707 dwellings are expected to be delivered after the period to 2050. Hatton will see the delivery of an additional 558 dwellings in the period post-2050.

Long Marston and Hatton offer the best potential for delivery in the plan period and offer the best cumulative package of additional benefits through the Stratford-upon-Avon Bypass and rail improvements between Birmingham Moor Street and Leamington Spa, and have demonstrated the strongest case for availability given the level of engagement made by promoters at Hatton throughout the plan-making process, and the existing planning history at Long Marston.

6.3 Strategic Growth Locations

Strategic Growth Locations form the second spatial layer of the growth proposed in the South Warwickshire Local Plan in terms of their individual scale, however they cumulatively deliver the greatest portion of its growth. Strategic Growth Locations also refer to the sites which will be required to meet the Strategic Employment Need within Opportunity Area 8 identified in the evidence base for Employment Land. Further information of the Site Selection for strategic employment is provided in Annex B – Employment Growth: Detailed Review.

Strategic Growth Locations have been derived via a long list that was presented at Preferred Options. Following the Preferred Options consultation, several sites were initially removed as these sites were not considered to form part of optimal strategic growth pattern for the SWLP for either housing or employment growth. It is important to note that a location not being considered as having potential for Strategic Growth, was still considered as being a potential for smaller scale non-strategic growth elsewhere in the plan through Local Growth Locations as set out in section 6.4.

Table 6-3 Strategic Growth Locations removed following the Preferred Options Consultation

Strategic Growth Location at Preferred Options	Key considerations
SG14: East of Gaydon	Residential development considered to be disjointed in terms of its relationship with Lighthorne Heath and Gaydon, given that the development proposals are located to the eastern side of the M40. Likely education capacity constraints. Poorly performing site in terms of HELAA.
SG17: Shipston on Stour	Located in the setting of the Cotswold National Landscape. Shipston is remote in the context of South Warwickshire and considered unable to take the strategic scale growth, and settlement is located poorly in relation to the spatial growth strategy which focuses development on spatial priority areas. Flood risk also a particular concern, particularly for sites to the east of town.
SG21: Alcester	Separated from the existing settlement by the A435 which would act as an impermeable barrier for development, this would lead to sub-optimal masterplanning outcomes and make it difficult for integration with the existing settlement with associated impacts for future residents. The A435 also makes access arrangements unclear and unlikely to be achieved. Green Belt site with highest HELAA score of any potential Strategic Site.

Strategic Growth Location at Preferred Options	Key considerations
SG22: West of Studley	Full extent of the SGL seen not seen to be sustainably located, with poor access arrangements and highways constraints. Strategic scale development would be reliant upon facilities outside of South Warwickshire, notably Redditch, for provision of key services. This is felt to be inconsistent with the spatial growth strategy for the South Warwickshire Local Plan.
SG24: Hockley Heath	Site is adjacent to Solihull Borough and would be reliant on infrastructure outside of the South Warwickshire area with implications for growth identified by Warwickshire County Council. Objections received from Solihull Borough Council. Development would be inconsistent with the principles set out in the spatial growth strategy

Following this review of the potential Strategic Growth Locations, further engagement was carried out with the promoters for each individual site, with opportunities for further submissions of technical evidence, this was supplemented by engagement with ward members to gather local intelligence which may not have been included in submission. Each site has been considered holistically as part of the growth strategy with extensive engagement with site promoters that are active within an area. Joint working has been encouraged, with developers and site promoters providing draft masterplans.

Following reviews of these submissions, and the receipt of further technical information from consultants, and further engagement with ward members and other key technical consultants, the decision was made to allocate certain sites, and discount others from the preferred growth strategy. Annexe C: Strategic Site Selection Rationale provides a full review of the site assessment for Strategic Growth Locations however Table 6-4 Strategic Growth Locations at Publication Stage provides a summary overleaf.

Table 6-4 Strategic Growth Locations at Publication Stage

SGL at Preferred Options	Key considerations	Allocated in SWLP Reg 19? (Y/N)	SWLP Reg 19 Ref
SG01: South of Coventry	This site is a significant strategic commitment, with opportunities to implement significant transport improvements to the South of Coventry area through the provision of a multimodal transport corridor. Scale of development leverages significant infrastructure provision including new secondary school. Development requires significant Green-Belt release but there are considered to be exceptional circumstances to justify release and implement measures to mitigate impacts.	Y	COV.1
SG02: Stoneleigh Park Employment	<p>Non-strategic employment site with 81ha of non-strategic employment land utilising some previously developed land. Well-located for access onto the A46 road corridor. Impact on Stoneleigh Village requires mitigation through spine road, bypassing the existing village to retain its character.</p> <p>Note Site is now considered to be a non-strategic employment site and henceforth will be considered as a Local Growth Location due to type of development, however scale of development is still considered to require a site-policy in the SWLP.</p>	Y	See policy DS.5 – Local Growth Employment
SG03: Coventry Airport	Existing commitment with extant permission from permission W/21/1370 and W/25/0265. Policy safeguards for delivery of employment use, principally for a battery manufacturing and recycling facility. The policy also accepts the principle of bringing forward alternative proposals for advanced manufacturing falling with E(g) (office, research and development and industrial processes), B2 (general industrial) uses. Notably, proposals primarily for logistics operations under B8 (Storage and Distribution) will not be supported.	Y	COV.2
SG04: South of Kenilworth	Modestly scaled allocation to the South of Kenilworth, a large settlement in Warwick District. Development utilises existing proposals on former Kenilworth Sixth Form site. Relatively sustainable location for development.	Y	KEN.1
SG05: East of Lillington	Urban extension to Leamington. Proposals are required to consider impacts alongside SG06: North of Leamington ensuring that capacity exists for secondary education provision. Development proposals include substantial country park and offer opportunities to leverage improvements to Lillington area in accordance with spatial development strategy.	Y	LEA.3
SG06: North of Leamington	Development split across two parcels – Land North of Blackdown and Land North of Leamington. Proposals required to consider in combination effects with each other alongside development at SG05: East of Lillington. Combined proposals offer the provision of a new supermarket and expansion of North Leamington School offer significant benefits. Development impacts on Kenilworth Road is a key consideration.	Y	LEA.1 LEA.2

SGL at Preferred Options	Key considerations	Allocated in SWLP Reg 19? (Y/N)	SWLP Reg 19 Ref
SG07: Wedgenock Park Farm Employment	Considered as a contingency strategic employment site in the absence of Red House Farm (SG09) coming forward. Concern about proximity with Hatton, with clear Green Belt sensitivity given that it would effectively merge the settlements. Hatton is already the focus of significant growth given the New Settlement proposals. Development would be reliant on A46 Stanks Island which has identified capacity constraints that would negate its effectiveness for strategic employment.	N	
SG08: West of Warwick	Site capacity limited by areas of flood risk in the northern area of the site. This requires access via Hampton Road which mitigates effects on A46 Stanks Island roundabout. Modest scale of development in a relatively sustainable location makes site appropriate for development in principle.	Y	WAR.1
SG09: South of Europa Way	Hybrid site with strategic employment at Land at Red House Farm and residential elements at Land at Park Farm. Development proposals will deliver a new motorway junction for the M40, rationalising junctions 13 and 14. This is a real strategic benefit of the growth strategy and has garnered support from National Highways.	Y	BIS.1 BIS.2
SG10: Bishop's Tachbrook	Alongside SG09 development proposals at Land at Park Farm, SG10 offers the opportunity to provide better connectivity through Bishop's Tachbrook Parish, improving the gateway to Warwick along Europa Way, whilst connecting recent development at the Asp's in Warwick with Bishop's Tachbrook.	Y	BIS.3
SG11: South East of Whitnash	Promoter submission lacked detail with limited of engagement with plan making process. Little evidence demonstrating how the site could be bought forward. Limited community facilities proposed as part of the scheme. Clear highways issues along Harbury Lane. Relative to proposals at SG09 and SG10, not as well related to either Leamington/Whitnash or Bishop's Tachbrook. Does not benefit from M40 access, or access onto A452/Europa Way into the town centre. Feedback from local ward members was less positive, with relative support for development at SG09 and SG10. Location felt to be less sustainable.	N	See policy DS.5 – Local Growth Employment
SG12: Southam	Significant secondary education issue in east of District. Acknowledging that school has a much wider catchment, given steer against dispersal and benefits of co-locating housing within walking and cycling of school and infrastructure, Southam is a preferred location. Range of developers involved requires considered phasing with options for early delivery to be explored. Development proposals include a new secondary school as a significant benefit given identified capacity constraints at the existing school in the town. Development is considered to be relatively deliverable in highways terms, despite the large scale of proposals.	Y	SOU.1

SGL at Preferred Options	Key considerations	Allocated in SWLP Reg 19? (Y/N)	SWLP Reg 19 Ref
SG13: Gaydon Lighthorne Heath	Key employment site delivering substantial amounts of strategic and non-strategic employment land. Protects and enhances Jaguar Land Rover and Aston Martin Lagonda sites. These are sites of strategic importance to the sub-regional, regional and national economy. Proposals include the potential provision a new slip access road dependent on the delivery of a new motorway junction at J13 and J14.	Y	GAY.1
SG15: North of Wellesbourne	Development at SG15: North of Wellesbourne has been reduced through the refinement process given the co-location with SG16: South of Wellesbourne to mitigate some of the impacts on the existing settlement. The proposals include a new primary school and local centre which provides further mitigation. Wellesbourne remains a fundamentally appropriate location for growth. Development proposals include the Wellesbourne Link Road providing connectivity to M40 Junction 13/14.	Y	WEL.1
SG16: South of Wellesbourne	<p>Non-strategic employment development at Wellesbourne Airfield, consists of Previously Developed Land, offers opportunity to enhance the role of the airfield in the local and sub-regional economy. Development proposals include the Wellesbourne Link Road providing connectivity to M40 Junction 13/14.</p> <p>Refinement has seen the reduction of development and removal of residential elements. Remaining focus of development is on Wellesbourne Airfield, this enables development at SG15: North of Wellesbourne to not overwhelm the town.</p>	Y	See policy DS.5 – Local Growth Employment
SG18: West of Stratford-Upon-Avon Group. (West Shottery)	Development at West Shottery has been informed by the emerging development to the west of the town at Shottery View. The proposals allow for further co-ordination to boost the amenity offer to residents in the west of the town, providing opportunities for public open space via a new community park. Proposals can support the Stratford Upon Avon SWRR, which act as a key strategic benefit for the spatial strategy for existing and future residents	Y	STR.3
SG18: North of Stratford Upon Avon (Clopton Quarter)	<p>This SGL includes two separate areas to the north of Stratford-upon Avon with a typical urban extension to the North East, and a densification scheme utilising land at Stratford-upon-Avon Park and Ride to bring forward land in its car park.</p> <p>Landscape led proposals will include a range of additional infrastructure provisions including a new mixed use pedestrian gateway at Welcombe Hills Country Park, a primary school and other facilities.</p>	Y	STR.1

SGL at Preferred Options	Key considerations	Allocated in SWLP Reg 19? (Y/N)	SWLP Reg 19 Ref
SG19: East of Stratford-Upon-Avon	Development proposals provided opportunity for significant provision of two new primary schools and one new secondary school, addressing education capacity constraints from the town. Area will benefit from the SWRR which will provide through access around Stratford-upon-Avon, development provides further opportunities for funding mechanisms to bring this forward along Long Marston.	Y	STR.2
SG20: Bidford-on-Avon	<p>Growth at Bidford offers the opportunity to balance proposals in Stratford-upon-Avon more effectively. Development proposals would see the provision of a range of infrastructure including 11ha of employment land, and a new secondary school which would serve Bidford and the wider area.</p> <p>Development is focused on the north and east of the town, key consideration is ensuring accessibility between the existing areas of the town and new areas of housing and employment land, ensuring that services and amenities support new and existing residents alike</p>	Y	BID.1
SG23: North of Henley-in-Arden	Location benefits from an existing train station, secondary school and local centre. Development proposals include new healthcare provision, two primary schools, expansion of the existing secondary school to provide a Sixth Form and local employment provision. Significant green infrastructure enhancements proposed through a Country Park at Beaudesert Mount. Flood alleviation works also proposed.	Y	HEN

6.4 Local Growth Locations

The focus of the spatial growth strategy has been ensuring that strategic-scale development is prioritised at new settlements and strategic growth locations as demonstrated above, this is due to their capacity to maximise the delivery of new infrastructure. This was a key message that emerged from the various rounds of consultation, from elected members of both Councils and, crucially, confirmed by infrastructure providers regarding the capacity of existing facilities to accommodate additional growth.

Notwithstanding this, the SWLP needs to ensure continual delivery of housing over the life of the plan-period (the larger sites are more likely to have longer lead-in times) and is, in any event, required by the NPPF to ensure that 10% of the housing requirement is met from smaller sites. To achieve these objectives, the SWLP will meet some of its housing needs from Local Growth Location allocations and non-allocated sites or windfall sites.

During the preparation of the Regulation-19 version of the SWLP these Local Growth Locations were known as 'non-strategic sites', however for publication these are being referred to as Local Growth Locations, which are considered to be non-strategic in nature. This means that they are development proposals which are smaller in scale, provide less infrastructure, and are more reliant on their relationship with their local area. Typically, even when considered cumulatively at a single settlement, the amount of combined Local Growth Locations is less than a Strategic Growth Location, though it is recognised that there is some overlap between smaller Strategic Growth Locations, and settlements that are seeing larger amounts of non-strategic growth.

A key element that differentiates Local Growth Locations to New Settlements and Strategic Growth Locations is the methodology that has informed them. The long list for potential Strategic Growth Locations was short, with each site relatively delivering a large amount of growth, each site has considered at length with detailed assessment of developer submissions and detailed feedback received from external consultants. For Local Growth Locations, where there was a much broader long-list, the process has been more focused on ruling sites out based on rounds of assessment in relation to their performance against constraints, or relative to each other at a particular settlement based on a comparative consideration of performance against identified constraints.

The identified Local Growth Locations conform with the spatial priority areas set out in Section 3.3 of this Topic Paper and are therefore consistent with the preferred spatial approach Sustainable Travel and Economy. This differs from previous approaches of both Councils that identified a hierarchy of settlements based on their size or functionality at which allocations are made. As such, it was felt to be inappropriate to allocate land based on the role and function of a particular settlement, with focus instead on the overall sustainability of a site when considered in relation to specific constraints and the hierarchy of sustainability identified in the NPPF.

Annex A - Local Growth Locations Site Selection Methodology provides the full methodology for the selection of Local Growth Locations for residential development. The preferred LGLs are listed in Policies DS.5, DS.6 and DS.7, of the SWLP itself, which also considers employment,

retail and mixed-use sites which have been carried forward, as set out in Annexe B – Employment Growth Detailed Review. Importantly, almost all of the LGLs all fall within Priority Areas 1 and 2, identified as Batch 1 Sites in terms of their role within the Local Growth Locations -Site Selection Methodology. Sites within Priority Area 3 and some other sustainable settlements have not been taken forward but have been assessed as part of the SA/SEA, these are identified as Batch 2 sites in terms of their role within Annexe A - Local Growth Locations – Site Selection Methodology. One exception here has been in the village of Barford in Warwick District where it has been necessary to bring forward additional sites that are less sustainably located.

The NPPF includes various paragraphs which indicate a hierarchy in which sites in different locations should be prioritised.

- **NPPF 7:** Contribute to the achievement of sustainable development
- **NPPF 11 part (a):** Promote sustainable pattern of development including effective use of urban land.
- **NPPF 110:** Focus development in locations which are or can be made sustainable
- **NPPF 115 part (a):** Ensure that site allocations prioritise sustainable transport modes
- **NPPF 124:** Make as much use as possible of previously developed land (PDL), except where this would conflict with other policies in the Framework.
- **NPPF para 147:** Examine fully all other reasonable options before changing Green Belt boundaries, including making as much use as possible of suitable PDL, optimising density, and holding discussions with neighbouring authorities about accommodating need.
- **NPPF para 148:** If releasing Green Belt for development, prioritise PDL, then grey belt, then other Green Belt locations – but promoting sustainable patterns of development.

A level of judgement has been required in interpreting how the above paragraphs should be translated into a hierarchy of land types for development. The overriding consideration of the NPPF is the promotion of sustainable development. Where there is ambiguity between different elements of the NPPF, the promotion of sustainable development should be the deciding factor. Figure 7-5 is a reasonable reflection of the NPPF hierarchy and the fundamental intentions of the framework.

Figure 7-5 NPPF Hierarchy

Land type	Rank when sustainably located	Justification for position in hierarchy when sustainably located	Rank when less sustainably located	Justification for position in hierarchy when less sustainably located
PDL, urban	1	NPPF 11 and 124: Sustainable pattern of development, effective use of urban land, use of PDL.	-	All urban land falls within SWLP Priority Area 1 and is considered to be sustainably located
Undeveloped land, urban	2	NPPF 11: Undeveloped urban land is positioned higher than non-urban PDL because of the high sustainability of urban locations. Note that in reality, much of this land type would be unsuitable for development for other reasons e.g. preservation of public open space.	-	All urban land falls within SWLP Priority Area 1 and is considered to be sustainably located
PDL, non-urban, non-Green Belt	3	NPPF 11 and 124: Use of PDL. Note that non-urban PDL will be found in locations of varying sustainability.	8	NPPF 124: The use of PDL must not conflict with other policies in the framework. To avoid conflict with NPPF 11, it is appropriate for less sustainably located PDL to be considered <i>after</i> sustainable Green belt locations. NPPF 147: Refers to using “suitable brownfield land” before considering Green Belt sites. It is considered that less sustainably located non-Green Belt PDL is not “suitable” compared to sustainably located Green Belt sites.
Undeveloped land, non-urban, non-Green Belt	4	NPPF 147: After the exhaustion of the first three levels of the hierarchy, sites in this category are likely to form the bulk of the “reasonable options” to be fully explored before there is any justification for altering Green Belt boundaries.	9	NPPF 147: The “reasonable options” explored prior to considering Green Belt sites are those in sustainable locations. It is considered that less sustainably located non-Green Belt sites are not “reasonable” compared

				to sustainably located Green Belt sites.
PDL, Green Belt	5	NPPF 124: The requirement to make use of PDL has a caveat that it must not conflict with other policies in the framework. To avoid a conflict with NPPF 147, it is appropriate for Green Belt PDL to be considered <i>after</i> undeveloped land in sustainable non-Green Belt locations.	10	NPPF 148: The hierarchy within the Green Belt is presented unambiguously; but promoting sustainable patterns of development is a key part of this paragraph. Consequently, unsustainably located PDL is not prioritised.
Undeveloped land, grey belt	6	NPPF 148: Development of Grey belt is only “not inappropriate” when it is sustainably located. NB in some cases it may be possible for land to be made sustainable; but grey belt sites indicated as unsustainable in the Green Belt review Stage 2 are ranked 7 in this hierarchy.	11	NPPF 148: Although sustainability of the location is required for grey belt development, this category is included in this column in recognition that there are levels of sustainability. For example a site could meet a minimum threshold of sustainability used to determine grey belt, but still be less sustainable than other Green Belt locations.
Other Green Belt	7	NPPF 148: The hierarchy within the Green Belt is presented unambiguously.	12	NPPF 148: Less sustainable Green Belt is the lowest level of the hierarchy.

Deciding whether a location is sustainable is not a binary choice, but a spectrum reflecting connections to a wide range of facilities. For example, an urban site near public transport, retail, education, employment, health and community facilities is unambiguously a sustainable location; and an isolated location a long distance to equivalent facilities is unambiguously an unsustainable location. However, most sites will fall between these two extremes, and there may be sites which are sustainable “enough” to take some growth, if necessary, but which are not a first choice. Where this is the case, these sites have been identified as reasonable alternatives for their respective Batches in relation to the priority areas.

Regarding grey belt, it is noted a minimum threshold of sustainability is used to determine where grey belt development would be “not inappropriate”. Sites above this threshold will still have a spectrum of sustainability, and it remains appropriate to consider how these compare to other Green Belt locations.

There are numerous ways of measuring the sustainability of a location, and different approaches may be appropriate in different scenarios. For example, a settlement hierarchy may

be determined by the consideration of a much wider range of factors than is expedient when assessing several hundred individual sites. A Settlement Hierarchy however would inherently bring forward more locations for development and would require apportionment to all the locations set out in SWLP Policy DS.8. As established in this paper, this is clearly not the preferred choice of either the general public or ward members.

The SWLP priority areas were drawn to direct growth according to the chosen Sustainable Transport and Economy spatial growth strategy. The various elements which contribute to the priority areas are reflective of elements of sustainability, whether physical proximity to facilities and public transport, or using development to meet the housing and employment needs of the current population. It is considered appropriate, and reflective of the wider aims of the SWLP, to use the priority areas as a proxy for sustainability in the context of site selection. The rationale for the priority areas is set out in Section 3.3 above.

As the majority of Priority Area 1 land falls within existing urban area boundaries, with relatively little outside of these boundaries, it is reasonable to consider Priority Areas 1 and 2 together as reflective of the most sustainable locations in South Warwickshire as “Batch 1”.

Land in Priority Area 3 is rather more extensive than Priority Areas 1 or 2, because of the greater buffer distances used, and this land can be seen as the “less sustainable” locations. Grouped with sites in Priority Area 3 in “Batch 2” are two types of exception:

- Sites in or adjacent to settlements where part of the settlement is in Priority Area 3. This reflects the fact that some mid-sized villages have some Priority Area 3 around a well-served bus stop, and it would appear somewhat arbitrary to include or exclude sites in such villages that fall just inside or outside of Priority Area 3 on this basis.
- Sites in or adjacent to 2016 Core Strategy Category 1 Local Service Villages. This reflects the fact that Long Itchington does not fall into a priority area, despite being relatively well served in terms of local facilities.⁴⁴

Land outside of Priority 3 (or the two exceptions above) is in general not considered sustainable and will only be considered in exceptional cases, if more sustainable land has been exhausted before SWLP growth needs have been fully accommodated. Allocation of such sites will be dependent on evidence that the location is or can be made sufficiently sustainable to support development.

Subsequently, the focus has been ensuring that Local Growth Locations are located within Priority Areas 1 or 2. Following the initial assessment of sites, and after further review of the housing figures both in terms of supply and requirement, it was identified that it was necessary to find additional Local Growth Locations. For this initial step, the decision was made to utilise Reasonable Alternatives in Priority Areas 1 or 2, rather than turning to Preferred Sites in Priority Area 3, with the exception of development options in Barford. These sites remain a possibility for future allocation, if additional sites are required during the examination of the South Warwickshire Local Plan. By implication, this means that Green Belt sites in Priority Areas 1 or 2

⁴⁴ The 2016 Stratford-on-Avon District Core Strategy identified the following as Category 1 Local Service Villages: Bishop’s Itchington, Harbury, Long Itchington, Quinton, Tiddington. Aside from Long Itchington, the other Category 1 LSVs all have some land at Priority 3 or higher. Villages in Warwick District of equivalent size and local facilities all have some land at Priority 3 or higher.

are considered to be more sustainable and allocated ahead of sites that are outside the Green Belt in Priority Area 3, due to their accordance with the spatial growth strategy. Further consideration of the Green Belt in relation to the spatial growth strategy is provided in the Green Belt Exceptional Circumstances Topic Paper. Further consideration of how non-strategic employment Local Growth Locations have been derived is provided in Annex B – Employment Growth: Detailed Review.

6.5 Other Growth Locations

The SWLP does establish a settlement hierarchy for South Warwickshire primarily as a policy mechanism to manage unallocated development proposals through SWLP Policy DS.8 – Other Growth Locations. This is to ensure that South Warwickshire Local Plan is pragmatic, flexible and robust. This hierarchy is based on the settlements identified in the two existing local plans, amended to reflect the wider objectives of the SWLP. Again, given the rural nature of South Warwickshire with its dispersed settlement pattern, this approach is considered reasonable. It strikes the right balance between maintaining the vitality of rural communities (as per the Taylor Review) without concentrating a significant quantum of development in unsustainable and rural locations.

Four categories are identified:

- Main urban areas comprising the largest towns in South Warwickshire;
- Main Service Centres a network of small market towns and large villages with a range of services that act as focal points serving a wider rural hinterland;
- Local Service Centres several small and medium-sized villages across the rural area
- Rural Service Centres – smaller villages whose growth is constrained by their location in either Green Belt or the Cotswolds National Landscape.

Below these categories, the SWLP acknowledges the limited role of small villages and hamlets in accommodating specific types of residential development including agricultural workers accommodation and rural exceptions affordable housing to meet identified local needs. The approach to residential development in the countryside is set out in SWLP Policy DS.12.

In planning for the above, the SWLP anticipates a certain quantum of development from these sources known as a windfall allowance which contributes to meeting the housing requirement to-find figure. SWLP Policy DS.8 makes clear that windfall development will only be expected to come forward within the built-up area boundaries of Main Urban Areas, Main Service Centres and Local Service Centre. This is significant departure from the more permissive approach of the current Local Plans of both Councils and reflects the focus on delivering Strategic Growth as a priority as an outcome of the spatial growth strategy.

In addition, the SWLP encourages parish and town councils to prepare neighbourhood plans and to allocate sites for housing within these plans. However, the SWLP consciously does not expect neighbourhood plans to do so (given that neighbourhood planning should be a bottom-up exercise) and therefore no assumption is made as to the contribution that such sites may make to meeting South Warwickshire's housing needs. As such, any such supply can rightly be

seen as a further headroom or contingency, reinforcing the flexibility of the SWLP and its housing trajectory.

6.6 ‘Windfall’ Allowance

‘Windfall’ housing refers to those homes that are built on unidentified sites which did not previously feature in a development plan. These are previously unanticipated sites that will come forward over the plan period having demonstrated compliance with the policies of the development plan, in reflection of the discretionary nature of the Town and Country Planning system in England.

During the lifetime of the SWLP, given the composition of South Warwickshire in terms of its rurality, dispersed settlement pattern and urban areas with a national and local policy presumption in favour of brownfield and more intensive redevelopment, it is reasonable to make an allowance for a certain number of homes to be built on ‘windfall’ sites within the plan period via SWLP Policy DS.8 – Other Growth Locations. This is known as a windfall allowance. A windfall allowance may be justified if a local planning authority has compelling evidence to do so in accordance with NPPF 2024 Paragraph 75

Table 2.8 shows past trends of the number of dwellings that have come forward as windfall development on small sites (those of 1-9 dwellings) in both Districts.

Table 2.8 Historic windfall delivery rates on small sites of 1-9 dwellings

	Stratford-on-Avon	Warwick
2018/19	197	98
2019/20	245	125
2020/21	158	87
2021/22	182	92
2022/23	154	79
2023/24	153	85
2024/25	126	47
Mean average 2018/19-2024/25	173.6	87.57

NPPF Paragraph 75 goes on to state that any allowance should be realistic, having regard to strategic housing land availability assessment⁴⁵, historic windfall delivery rates and expected future trends. In order to ensure any windfall allowance used in the SWLP is realistic, the mean average historic rate has been reduced by 5%, resulting in the following annual figures:

- Stratford-on-Avon = 165dpa
- Warwick = 83dpa

The windfall allowance is applied from year 4 of the plan period onwards. This reflects the typical time period it takes for unknown sites of this size to emerge, be granted planning permission and begin building out. Therefore, the above windfall allowances are applied for a total of 22 years within the 25 year plan period. Applying the windfall allowance results in a corresponding reduction in the number of homes that the SWLP needs to allocate.

⁴⁵ In the case of the SWLP, this is the Housing and Economic Land Availability Assessment

Table 2.9 Windfall Allowance

	Stratford-on-Avon	Warwick	South Warwickshire
Minimum residual dwellings to be allocated	23,975	20,976	44,951
Annual Windfall allowance	165	83	248
Total Windfalls in plan period	3,630	1,826	5,456
Remaining dwellings to be Allocated (minimum)	20,345	19,150	39,494

6.2 Summary

The refinement process has resulted in a spatial growth strategy which is considered to represent the most sustainable available approach having considered reasonable alternatives and the requirements of national policy for plan making to achieve sustainable development.

When developing the preferred strategy, the Councils have sought to ensure that the distribution of development meets the full scale of housing and employment needs identified in section 2 in a way which is both aspirational and deliverable. This is reflected in the ambition to not only resolve issues arising from future development and instead choose development options that offer meaningful benefits for existing residents through providing strategic-scale development. This is complemented by a balance between strategic growth and more modest locally focused provision.

A key driver of this approach has been the need to identify align growth with infrastructure provision. It is understood how important a well-planned approach infrastructure is when delivering growth over a 25-year period. This has been reflected in the evidence base such as through transport modelling, masterplanning and discussion with stakeholders. A key guiding principle for the refinement of the growth strategy has been the need to avoid a dispersed pattern of development that would place an unsustainable pressure on existing services and networks and limit the ability to secure the necessary mitigation. Therefore, the growth strategy concentrates development in a relatively small number of New Settlements and Strategic Growth Locations which allows for the delivery of significant infrastructure improvements including new transport infrastructure, schools, community facilities and public open space that would be achievable through a more dispersed pattern of growth.

At the same time, the strategy recognises that an approach solely reliant on large-scale infrastructure, for example, one which was only delivered via new settlements, would be insufficient in delivering housing in the early years of the plan period and overly reliant on too few sites. The utilisation of Strategic Growth Locations alongside New Settlements acts a ‘goldilocks’ approach, in that they make a more immediate contribution to housing supply but are typically still capable of supporting infrastructure provision. This flexibility is furthered by Local Growth Locations and Windfall Development, which play an important role in supporting

delivery in the early phases of the plan period and ensuring that both councils can demonstrate a Five-Year Housing Land Supply.

The spatial distribution of development has been guided by the Sustainable Travel and Economy strategy, which was confirmed as the preferred approach, operationalised via priority areas. This ensures that development has been directed towards locations that are related to existing settlements, public transport networks, employment opportunities and services. In doing so the strategy promotes more sustainable travel patterns. Alternative approaches were considered throughout the plan-making process, including more dispersed approaches, more focused on existing settlements and greater numbers of new settlements. The preferred growth strategy is considered to balance these components to provide an optimal mixed approach that utilises the best aspects of these alternative approaches, and mitigates some of their individual harms.

The preferred strategy is therefore considered to represent a balanced approach to development in South Warwickshire, that has robustly considered the best way to deliver sustainable development in South Warwickshire. It provides a clear mechanism for delivering growth, it allows for the alignment of development with infrastructure provision and offers sufficient flexibility to ensure a mix of housing comes forward.

7 Conclusions and Next Steps

This Topic Paper has set out how the spatial growth strategy has informed the distribution of site selection in the South Warwickshire Local Plan and how it is positively prepared, justified, effective and consistent with national policy. The SWLP has considered the profiles and existing of approaches of both Councils as a starting point in the preparation of the growth strategy to retain and discontinue elements of both approaches.

The level of housing growth is required by national policy through the standard method for calculating housing need. This limits the flexibility and sets an absolute minimum in terms of the amount of housing growth required. The amount of employment land required has been independently identified through regionally accepted studies, that have informed plan-making for neighbouring authorities. In this context the accepted housing requirement for South Warwickshire is 54,925 dwellings per annum having accounted for the combined housing need of both districts through the standard method for calculating housing need. The SWLP also provides employment land to meet 125ha of strategic employment land and 258.2ha of non-strategic employment land via allocations.

The chosen spatial growth strategy for South Warwickshire is Sustainable Travel and Economy. This was chosen at Preferred Options following previous rounds of consultation. The preferred strategy focuses growth on urban land, areas with access to sustainable transport modes, proximity with areas of employment and proximity with areas of socioeconomic deprivation. Whilst this provided the most appropriate locations for growth, further consideration of density, the need for new settlements and use of brownfield land have also been key considerations as part of the spatial strategy.

This spatial growth strategy has been developed into a series of key principles and priority areas which have formed the selection of New Settlements and Strategic Growth Locations as the strategic allocations of the SWLP. To ensure compliance with the NPPF, some smaller scale growth has been provided at Local Growth Locations, allowing the Councils to demonstrate a five-year housing land supply at the point of adoption. Windfall development is delivered through Other Growth Locations, typically within the Built-Up-Area-Boundary of existing settlements, with rural exception sites in the surrounding countryside.

All New Settlements and Strategic Growth Locations are developable within the plan period. It is expected that planning applications may be submitted during the examination of the local plan by developers to further resolve any outstanding technical issues. The Councils will continue to work positively with developers and other stakeholders to ensure that the development delivered through the SWLP is the most sustainable approach for the district's residents, considering national requirements for extensive housing and economic development.

The strategy is underpinned by a comprehensive evidence base including the HELAA, Sustainability Appraisal, transport modelling, Green Belt evidence and whole plan viability work. Collectively this evidence demonstrates that the sites identified are suitable, available and achievable, and the strategy is deliverable as a whole. Likewise, the spatial growth strategy is recognised as requiring significant infrastructure investment and delivery in support of it. Ongoing engagement with infrastructure providers, site promoters and other key stakeholders

will be critical in ensuring the successful implementation of the spatial growth strategy. However, again, the concept masterplans prepared in support of the SWLP alongside the Infrastructure Delivery Plan provide a clear framework for future delivery of strategic allocations.

In summary, the spatial growth strategy set out in the South Warwickshire Local Plan represents a balanced, deliverable and sustainable approach to meeting development needs. It provides a clear basis for decision-making and is considered to offer the most appropriate strategy for South Warwickshire in the plan period to 2050.