

South Warwickshire Local Plan (SWLP): Spatial Strategy and Strategic Site Allocations Evidence Base

Potential Areas for Further Examination - Draft for Trinity Mead Residents Group

Draft Technical Review prepared for Trinity Mead Residents Group (SHAPE)–
version 1

13/08/2026

1. Context & Statutory Framework

The emerging South Warwickshire Local Plan (SWLP) identifies Strategic Growth Locations, new settlements and urban extensions intended to meet the area's long-term housing and employment needs. The Councils have supported these allocations through a substantial evidence base including the Sustainability Appraisal, Strategic Site Selection Rationale, Strategic Growth Location assessments, transport evidence, flood risk evidence and other technical studies.

National planning policy does not require that every reasonable alternative is ultimately selected. Rather, the Plan must demonstrate that the preferred strategy has been chosen following a proportionate, transparent and evidence-based assessment of the reasonable alternatives. This requires the evidence to explain not only why preferred allocations were selected, but also why other strategic options were discounted.

The purpose of this review is therefore not to argue that any rejected site should necessarily have been allocated in place of the preferred strategy. Instead, it examines whether the published evidence applies a consistent assessment methodology across both preferred and rejected strategic options, and whether comparable characteristics have resulted in comparable planning judgements.

In particular, the review considers whether similar issues, including transport infrastructure requirements, existing rail accessibility, settlement form, landscape sensitivity, infrastructure provision, recreational value, flood risk and other environmental constraints, have been evaluated consistently throughout the site selection process.

Where preferred allocations rely upon future mitigation, infrastructure delivery or masterplanning to overcome existing constraints, the review considers whether equivalent assumptions were afforded to reasonable alternatives.

The Examination in Public provides an opportunity to consider whether the evidence supporting the preferred spatial strategy is robust, justified and proportionate, and whether the comparative assessment of reasonable alternatives satisfies the requirements of national planning policy and strategic environmental assessment. The matters identified in this review are intended as potential lines of inquiry for the Examination.

Relevant National Planning Policy Framework Considerations

The matters identified within this review are considered against the relevant requirements of the National Planning Policy Framework (NPPF), particularly those relating to the preparation of sound local plans, the assessment of reasonable alternatives, infrastructure delivery and environmental protection.

The principal policy considerations include:

- **Paragraph 36(b) – Justified:** Local Plans should be based on proportionate evidence and represent the most appropriate strategy when considered against the reasonable alternatives. This forms the primary policy basis for considering whether the published evidence applies a consistent methodology when comparing preferred allocations with rejected strategic options.
- **Paragraph 36(c) – Effective:** Plans should be deliverable over the plan period, supported by effective working on cross-boundary matters, and founded on infrastructure that can realistically be delivered. This is relevant where preferred allocations rely upon future transport infrastructure, schools, healthcare provision, flood mitigation or other strategic infrastructure.
- **Paragraph 39:** Plan-making should identify and evaluate reasonable alternatives before selecting the preferred strategy. The supporting evidence should therefore provide a transparent explanation of why preferred allocations were selected and why other reasonable alternatives were discounted.
- **Paragraph 114:** Planning should promote sustainable transport by maximising opportunities for walking, cycling and public transport, reducing reliance on private car travel wherever reasonable. This is particularly relevant when comparing

locations with existing railway stations and established active travel infrastructure against sites dependent upon future highway improvements.

- **Paragraph 116:** Development should only be prevented or refused on transport grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. This provides an important policy context when considering the consistency with which transport constraints have been treated across different strategic options.
- **Paragraphs 165–168:** Plans should apply a sequential, risk-based approach to flood risk, directing development towards areas of lower flood risk wherever reasonably possible and ensuring that flood risk is appropriately assessed and managed. These provisions are relevant to the assessment of flood-related constraints affecting strategic allocations and reasonable alternatives.
- **Paragraphs 180–187:** Planning policies should contribute to and enhance the natural environment by protecting and enhancing landscapes, biodiversity, green infrastructure and ecological networks. These principles provide the policy context for considering landscape sensitivity, environmental constraints and the effectiveness of proposed mitigation.
- **Paragraph 96:** Planning policies should promote healthy, inclusive and safe communities, including access to high-quality public spaces, green infrastructure and opportunities for recreation. This is relevant when considering the existing recreational and community value of land proposed for allocation and the extent to which replacement green infrastructure provides an equivalent level of public benefit.

While **Paragraph 36(a)** (positively prepared) forms part of the statutory soundness test for Local Plans, the principal matters considered within this review relate primarily to whether the evidence base demonstrates that the preferred spatial strategy is **justified, effective**, and supported by a transparent and proportionate assessment of the reasonable alternatives.

Taken together, the following chapters examine whether the evidence base applies a consistent and transparent methodology when comparing preferred allocations with rejected reasonable alternatives. Rather than seeking to promote any individual rejected site, each chapter considers whether comparable planning characteristics have resulted in comparable planning judgements. The principal lines of inquiry are:

- **2.1 Infrastructure Deliverability** – whether comparable transport infrastructure requirements and delivery risks have been assessed consistently across preferred and rejected strategic options.
- **2.2 Sustainable Accessibility** – whether existing rail connectivity and sustainable transport assets have been given appropriate weight when compared with highway-dependent preferred allocations.
- **2.3 Settlement Form and Landscape** – whether similar settlement relationships and landscape characteristics have led to consistent planning conclusions.
- **2.4 Future Infrastructure Assumptions** – whether equivalent assumptions regarding future healthcare, education and community infrastructure have been applied consistently to preferred and rejected sites.
- **2.5 Mitigation and Baseline Assessment (Policy STR.2)** – whether the evidence supporting STR.2 adequately establishes the existing baseline against which proposed mitigation measures are assessed, particularly in relation to recreation, community value and green infrastructure.

2. Core Lines of Inquiry

2.1 Transport Infrastructure Deliverability and Consistency of Site Assessment

Relevant NPPF considerations: Paragraph 36(c) (Effective), Paragraph 116.

The published evidence demonstrates a notable distinction in the way transport infrastructure requirements are treated during the site selection process. For several rejected strategic alternatives, unresolved highway constraints, engineering requirements and the absence of identified funding mechanisms form part of the rationale for rejection. By contrast, the preferred strategic allocations also depend upon major transport infrastructure, yet these requirements are generally presented as deliverable mitigation or strategic opportunities supporting allocation. The Examination may therefore wish to consider whether a consistent deliverability test has been applied across all strategic options.

Preferred Strategic Allocations

Policy LMA / E1 (Long Marston Airfield)

The dependency is particularly clear at Long Marston. The Councils' evidence identifies the existing highway network as a significant constraint, noting that Campden Road would be unable to accommodate the additional traffic associated with the development without an alternative highway solution. The refinement assessment therefore states that development requires delivery of the Stratford-upon-Avon South Western Relief Road (SWRR) / bypass and anticipates approximately 4,500 homes being delivered within the plan period. The Councils expressly acknowledge that delivery of the bypass requires external funding.

Policy STR.2 (South-East Stratford-upon-Avon)

STR.2 presents a similar, although not identical, infrastructure dependency. The selection rationale states that the allocation will benefit from the SWRR and that the development itself provides opportunities to support funding mechanisms for bringing the road forward. The infrastructure benefits associated with the SWRR are identified as a factor supporting the allocation, while acknowledging that significant highway issues remain to be resolved through detailed masterplanning.

Policy BID.1 (North and East Bidford-on-Avon)

Bidford presents a further strategic infrastructure dependency. The Councils identify the existing River Avon crossing as a significant transport constraint and conclude that a new crossing linking the B4039 to Honeybourne Road represents the required transport solution. The published evidence also acknowledges that the scheme would require additional land and presents particular delivery challenges because of floodplain constraints and its relationship with Flood Zones. The Sequential and Exception Test similarly identifies the proposed crossing as requiring further demonstration through the planning application process.

Table 1: Summary of Infrastructure Dependencies

Allocation	Critical highway infrastructure	Principal delivery dependency
LMA / Long Marston	Stratford-upon-Avon South Western Relief Road (SWRR) / bypass	Existing highway network cannot accommodate planned growth without the bypass. Delivery requires external funding.
STR.2	SWRR and associated highway improvements	Allocation assumes delivery of the SWRR while also contributing towards its funding. Significant highway matters remain subject to detailed masterplanning.
BID.1	New River Avon crossing	New bridge, additional land acquisition and flood-

Allocation	Critical highway infrastructure	Principal delivery dependency
	linking the B4039 to Honeybourne Road	related constraints requiring further assessment and delivery.

Rejected Strategic Alternatives

The published evidence identifies transport infrastructure constraints as a principal reason for rejecting several reasonable alternatives.

Danzey was rejected partly because of the constrained rural highway network. The evidence identifies the need for significant upgrades to Tanworth Road, new highway links through the site, improvements to the A435 corridor and wider strategic highway improvements associated with M40 Junction 16.

Kingswood similarly required substantial transport intervention. The evidence identifies highway constraints affecting Lapworth Street, Finewood Road, Old Warwick Road and surrounding junctions, while also identifying the potential requirement for a new M40 junction. Importantly, the Councils' published reason for rejection expressly includes the absence of an obvious funding mechanism for delivering that junction.

Bearley and Wilmcote was rejected in part because of its impacts on the local road network and its relationship with Stratford-upon-Avon, with transport constraints forming part of the overall rationale for rejecting the proposal.

Consistency of the Deliverability Test

The issue is therefore not whether significant transport infrastructure is required. Both the preferred allocations and several rejected strategic alternatives depend upon substantial highway intervention.

The apparent distinction is instead how those infrastructure requirements are treated.

For the rejected alternatives, unresolved highway constraints, engineering complexity and uncertainty regarding infrastructure delivery are presented as factors weighing against allocation. In the case of Kingswood, the absence of an identified funding mechanism for a potential new M40 junction forms part of the published reason for rejection.

By contrast, the preferred allocations also rely upon major transport infrastructure that is not yet delivered and, in some cases, requires external funding, land acquisition, statutory approvals and further technical work. Long Marston is explicitly dependent upon delivery

of the SWRR, which the Councils acknowledge requires external funding. STR.2 similarly assumes delivery of the SWRR while identifying the allocation itself as part of the mechanism for bringing the scheme forward. Bidford depends upon construction of an entirely new River Avon crossing despite acknowledged engineering and flood-related constraints.

Table 2: transport infrastructure reasoning, Kingswood vs Long Marston

Rejected site	Reasoning
Kingswood	Potential M40 junction with no obvious funding mechanism identified → rejection.
Long Marston	SWRR requires external funding → allocation proceeds assuming delivery.

The published evidence therefore appears to apply different deliverability assumptions to preferred and rejected strategic options. Infrastructure requirements are treated as evidence of limited deliverability where associated with rejected alternatives, yet comparable infrastructure dependencies are assumed capable of delivery where associated with preferred allocations.

This raises an important matter for Examination. The issue is not whether mitigation has been identified for the preferred allocations, but whether the same deliverability test has been applied consistently across all reasonable alternatives. In particular, the Examination may wish to consider whether major transport infrastructure requirements were treated as a disqualifying constraint when associated with rejected sites, whilst being treated as deliverable strategic opportunities when associated with preferred allocations.

Matters Requiring Further Evidence

The following points appear particularly relevant:

- What committed funding exists for the South Western Relief Road, as distinct from prospective funding mechanisms or future developer contributions?
- What infrastructure milestones must be achieved before the anticipated delivery of approximately 4,500 dwellings at Long Marston, and how would the housing trajectory respond if delivery of the SWRR were delayed?
- What funding, land assembly and statutory consenting arrangements are currently in place for the proposed River Avon crossing at Bidford?
- What is the critical delivery programme for these strategic infrastructure schemes relative to the planned housing trajectory?
- Why was the absence of an identified funding mechanism considered a reason for

rejecting Kingswood's potential M40 junction, while Long Marston is allocated despite the Councils acknowledging that delivery of the SWRR requires external funding?

- Has a consistent deliverability methodology been applied when assessing infrastructure-dependent preferred and rejected strategic options, including consideration of the consequences should the required infrastructure be delayed or not delivered?

2.2 Assessment of Rail-Connected Strategic Alternatives vs. Principal Allocations

Relevant NPPF considerations: Paragraph 114 (primary), 36(b) (secondary)

The published evidence raises questions regarding the consistency with which transport accessibility and existing rail infrastructure were considered when comparing rail-connected alternatives against the preferred strategic allocations (STR.2, LMA and BID.1). While several rejected options benefit from existing operational railway stations, the preferred allocations rely predominantly upon future highway infrastructure and associated mitigation measures. The evidence should therefore demonstrate how these differing transport characteristics were comparatively assessed.

Danzey (New Settlement Option A1/A3)

Land at Danzey is located immediately adjacent to Danzey Railway Station on the Shakespeare Line, providing residents with walkable access to an operational railway station offering services to Stratford-upon-Avon, Solihull and Birmingham. The Sustainability Appraisal (Appendix K) and Transport Assessment (Annexe C) indicate that the option was discounted following concerns relating to the local highway network, including the capacity of narrow rural lanes (Danzey Green Lane, Pig Trot Lane and Tanworth Road), potential cumulative impacts on M40 Junction 16, and objections raised by Warwickshire County Council Highways around the impact on the Local Road Network (Appendix K).

Bearley and Wilmcote (New Settlement Option BW)

Land at Bearley and Wilmcote is located in close proximity to Bearley and Wilmcote railway stations on the Shakespeare Line, providing opportunities for walkable access to operational rail services connecting Stratford-upon-Avon and Birmingham, with onward connections to destinations including Royal Leamington Spa. In addition, the settlements benefit from direct access to the Stratford-upon-Avon Canal, which provides an established off-road walking and cycling corridor into Stratford-upon-Avon and forms part of the area's wider active travel network. The Sustainability Appraisal (Appendix K) records that Option BW was discounted on the basis that it would function as an extension to Stratford-upon-Avon rather than a standalone new settlement. Additional concerns identified within the evidence include the landscape sensitivity of the Arden Special Landscape Area (SLA), together with transport constraints associated with the local road network, including the restricted width and height of the Salters Lane and Whitehorse Hill railway bridges.

The transport assessment (Annexe C) also identifies concerns regarding additional traffic assignment towards the A3400 corridor and Bishopton Island arising from development at this location. These highway impacts form an important component of the rationale for discounting the option. However, the published evidence provides limited explanation of how the sustainability benefits associated with the existing railway infrastructure at Bearley and Wilmcote were comparatively weighed against these highway constraints. Likewise, the evidence provides little discussion of the contribution that the existing canal towpath could make to walking and cycling connectivity between the proposed settlement and Stratford-upon-Avon as part of a wider sustainable transport network.

Kingswood (New Settlement Option C1)

Land south of Kingswood is located immediately adjacent to Lapworth Railway Station on the Chiltern Main Line, providing opportunities for walkable access to regular rail services connecting Birmingham, Solihull, Warwick, Leamington Spa and London Marylebone. The settlement also lies at the junction of the Grand Union Canal and the Stratford-upon-Avon Canal, providing an established network of traffic-free towpaths that support walking, cycling and recreational travel between surrounding settlements as part of the wider active travel network.

The Sustainability Appraisal (Appendix K) indicates that Option C1 was discounted for a combination of reasons, including fragmented land ownership, heritage considerations, landscape sensitivity and transport constraints. The transport evidence identifies engineering challenges associated with providing suitable highway access, including the potential requirement for a new M40 junction and the need for bridge crossings over the railway and canal network.

Table 1: Detailed Transport & Accessibility Comparison Matrix

Strategic Location	Operational Rail Access	Existing Walkable Access to an Operational Railway Station	Primary Transport Infrastructure Reliance
STR.2 (South-East Stratford)	No station within the allocation. Nearest station is Stratford-upon-Avon, requiring access by car, bus or a longer cycle/walk depending on location.	No	New spine road, A3400–A422 link road, multiple junction upgrades, active travel improvements, and longer-term South Western Relief Road (SWRR).
LMA / E1 (Long Marston Airfield)	No operational railway station serving the site. Long Marston station is closed.	No	New highway infrastructure, strategic road improvements, enhanced bus services and extensive internal road network.
BID.1 (Bidford-on-Avon)	No operational railway station within the settlement.	No	Predominantly highway-based access via the A46, B439 and local road improvements, together with enhanced bus services and active travel measures.
Danzey	Yes – Danzey Station (Shakespeare Line).	Yes	Existing railway infrastructure supplemented by local highway network.
Wilmcote	Yes – Wilmcote Station (Shakespeare Line).	Yes	Existing railway infrastructure supplemented by local highway network.
Kingswood	Yes – Lapworth Station (adjacent to Kingswood) on the Chiltern Main Line.	Generally Yes (depending on location within the settlement)	Existing railway infrastructure and existing strategic road network.

Preferred Strategic Allocations: Published Transport Characteristics

Policy STR.2 (South-East Stratford-upon-Avon)

STR.2 is located approximately 2.5 km from Stratford-upon-Avon railway station and does not benefit from direct walkable access to an operational railway station across much of the allocation. The Sustainability Appraisal identifies a number of accessibility constraints associated with the site, including the distance to certain local services and barriers to active travel created by the River Avon and principal highway corridors. The transport evidence (Annexe C) identifies significant impacts at the Banbury Road, Shipston Road and Tiddington Road junctions and proposes a package of mitigation measures including a new

internal spine road, strategic junction improvements, active travel infrastructure and longer-term integration with the proposed South Western Relief Road (SWRR).

Policy LMA / E1 (Long Marston Airfield)

Long Marston Airfield does not benefit from an operational passenger railway station, with the nearest stations located at Honeybourne and Stratford-upon-Avon. The Sustainability Appraisal identifies accessibility challenges associated with the site's location. The transport evidence describes a number of existing highway constraints, including limited capacity on the Campden Road corridor and restrictions at river crossings such as Binton Bridge and Clifford Chambers. The proposed transport strategy therefore relies upon substantial highway improvements, public transport enhancements and the longer-term delivery of the South Western Relief Road as part of the wider mitigation package.

Policy BID.1 (Bidford-on-Avon North and East)

BID.1 is not located within convenient walking distance of an operational railway station, with the nearest passenger rail services located at Honeybourne and Evesham. The transport evidence identifies existing congestion associated with Bidford Bridge and forecasts additional pressure arising from planned growth. The published mitigation strategy includes significant highway interventions, including a proposed new river crossing linking the B439 to Honeybourne Road together with wider improvements to the local highway network.

Comparative Assessment

The published evidence explains the engineering and highway constraints affecting Danzey, Bearley/Wilmcote and Kingswood. However, it provides comparatively limited explanation of how the sustainability benefits associated with their existing transport infrastructure—including direct walkable access to operational railway stations and, at Bearley/Wilmcote and Kingswood, established canal towpaths supporting walking and cycling—were weighed against those constraints. Nor does it clearly explain whether alternative transport solutions or strategic highway interventions were considered capable of mitigating the identified access issues.

This raises a question of consistency. The preferred strategic allocations (STR.2, Long Marston Airfield and BID.1) do not benefit from comparable walkable access to an operational railway station and instead rely upon substantial future highway infrastructure, public transport enhancements and active travel improvements to achieve sustainable transport objectives. The published evidence should therefore demonstrate how these differing transport characteristics were comparatively assessed, and whether a consistent methodology was applied across all strategic options.

Importantly, the wider site selection evidence demonstrates that existing rail connectivity was recognised elsewhere in the appraisal process as a positive sustainability attribute. Hatton (B1) is identified as performing well because of its proximity to Hatton railway station, while Henley-in-Arden's existing rail services are similarly identified as supporting sustainable accessibility. Conversely, the absence of nearby rail services is cited as a disadvantage for locations including Alcester, Studley and Bidford-on-Avon, increasing reliance on private car travel.

Taken together, these assessments indicate that proximity to an operational railway station was treated as a material planning consideration capable of influencing site selection. Against that background, an important matter for Examination is whether the same weighting was applied to Danzey, Bearley/Wilmcote and Kingswood, each of which benefits from existing rail infrastructure, and in two cases established off-road walking and cycling connections. The issue is not whether these locations should necessarily have been selected, but whether their existing sustainable transport assets were evaluated consistently, transparently and proportionately when compared with the preferred strategic allocations.

2.3 Assessment of Settlement Form and Landscape Considerations

Relevant NPPF considerations: Paragraph 180 (primary), 36(b) (secondary)

The published evidence raises questions regarding the consistency with which settlement form and landscape considerations were assessed when comparing rejected strategic alternatives against the preferred allocations, particularly Policy STR.2.

While the evidence identifies the relationship between Bearley/Wilmcote and Stratford-upon-Avon, together with landscape sensitivity, as significant reasons for rejecting that option, the preferred allocation at STR.2 is itself promoted as a major urban extension to Stratford despite acknowledging comparable landscape constraints. The evidence should therefore demonstrate how these characteristics were comparatively assessed and why they led to different planning conclusions.

Bearley and Wilmcote (New Settlement Option BW)

The Sustainability Appraisal (Appendix K) records that Bearley/Wilmcote was discounted for several reasons. In addition to transport concerns, the option was considered to function as an extension to Stratford-upon-Avon rather than a standalone new settlement. The appraisal also identifies the landscape sensitivity of the Arden Special Landscape Area (SLA) and prominent landscape concerns as contributing factors in the decision to discount the site.

The Strategic Site Selection Rationale similarly concludes that the site's proximity to Stratford-upon-Avon would result in development functioning as a large urban extension rather than an independent settlement. The evidence further notes that landscape impacts formed part of the overall planning judgement leading to its rejection.

Taken together, the published evidence indicates that both settlement form and landscape character were material considerations in discounting the Bearley/Wilmcote option.

Policy STR.2 (South-East Stratford-upon-Avon)

By contrast, the evidence supporting Policy STR.2 explicitly promotes development as a major urban extension to Stratford-upon-Avon. Rather than being viewed as a disadvantage, the relationship with the existing town is presented as a key component of the preferred spatial strategy.

The evidence also acknowledges landscape constraints associated with STR.2. Landscape sensitivity and visual impacts are recognised, but these are generally considered capable of being addressed through landscape-led masterplanning, green infrastructure, design measures and mitigation rather than representing reasons to reject the allocation.

The published evidence therefore treats landscape constraints as matters capable of mitigation within the preferred allocation.

Comparative Assessment

The issue arising from the published evidence is not whether Bearley/Wilmcote has less landscape impact than STR.2, nor whether one site is inherently preferable.

Rather, the question is whether similar planning characteristics have been assessed consistently across the reasonable alternatives.

For Bearley/Wilmcote:

- functioning as an extension to Stratford-upon-Avon contributes to rejection;
- landscape sensitivity contributes to rejection; and
- the combined planning judgement concludes that the site should not be taken forward.

For STR.2:

- functioning as a major urban extension forms the basis of the preferred growth strategy;
- landscape sensitivity is acknowledged but considered capable of mitigation through design and masterplanning; and
- the site is allocated for strategic growth.

The published evidence therefore appears to apply different planning conclusions to characteristics that are, at least in part, comparable.

Matters for Examination

The Examination may therefore wish to consider:

- why functioning as an extension to Stratford-upon-Avon is treated as a reason for

rejecting Bearley/Wilmcote but forms the basis of the preferred strategy at STR.2;

- whether comparable landscape constraints were assessed using a consistent methodology;
- why landscape impacts at STR.2 are considered capable of mitigation while those at Bearley/Wilmcote contribute to rejection; and
- whether the site selection evidence adequately explains these differing planning judgements.

2.4 Future Infrastructure Delivery and Assessment Consistency

Relevant NPPF considerations: Paragraph 36(b) (primary), 36(c) (secondary)

The Sustainability Appraisal assesses strategic options against a common baseline of existing infrastructure, including access to healthcare and education facilities. This provides a consistent starting point for comparing reasonable alternatives. However, the published evidence raises questions as to whether the ability of strategic-scale developments to deliver new infrastructure through masterplanning was applied consistently across all options.

Healthcare and Education Infrastructure

Under the Sustainability Appraisal, both the rejected strategic alternatives and the preferred allocations generally perform poorly against baseline accessibility measures for healthcare and education. Sites including Danzey and Bearley/Wilmcote are identified as being beyond preferred distances to existing GP surgeries, hospitals and schools, while the preferred allocations, including STR.2, Long Marston Airfield (E1) and Bidford-on-Avon (BID.1) also record negative baseline accessibility scores because they are similarly reliant on existing infrastructure that is either distant or already constrained.

The critical distinction is that the preferred allocations are subsequently assessed on the basis that these deficiencies can be overcome through future development. The Infrastructure Delivery Plan and supporting evidence rely upon the scale of these allocations to justify new GP provision, expanded healthcare capacity, new primary and secondary schools, and wider community infrastructure funded through the development itself.

By contrast, the rejected strategic alternatives appear to have been assessed primarily against their existing infrastructure baseline. This is despite evidence submitted by site promoters indicating that several alternatives were also capable of accommodating new healthcare facilities, schools and supporting community infrastructure as part of comprehensive masterplans.

Comparative Assessment

The issue is therefore **not** that the preferred allocations have better existing access to healthcare or education. The Sustainability Appraisal demonstrates that they generally do not.

Rather, the distinction appears to lie in the assumptions applied during the assessment process. For the preferred allocations, poor baseline accessibility is treated as a temporary condition capable of being addressed through future infrastructure delivery. For the rejected alternatives, comparable baseline constraints appear to remain negative characteristics despite evidence that strategic-scale development could similarly deliver new healthcare and education infrastructure.

This raises a broader question of consistency within the site selection process. If strategic masterplanning is accepted as capable of overcoming baseline infrastructure deficiencies for the preferred allocations, it is unclear whether the same planning assumption was applied equally when assessing the reasonable alternatives.

2.5. Assessment of Policy STR.2 (Strategic Growth Location SG19)

Relevant NPPF considerations: Paragraph 39 (primary), 96 (secondary), 36(b) (overall justification)

Policy STR.2 allocates approximately 2,727 dwellings together with supporting infrastructure on land east and south-east of Stratford-upon-Avon. The Councils' evidence acknowledges a range of existing constraints affecting the allocation, including transport, landscape, ecology, flood risk and infrastructure. However, the published evidence generally concludes that these constraints can be addressed through future masterplanning, mitigation and infrastructure delivery rather than representing barriers to development.

A Mitigation-Led Allocation

A consistent theme throughout the evidence base is that the acceptability of STR.2 depends upon future interventions rather than existing site conditions.

The allocation relies upon:

- significant highway improvements and a new internal spine road;
- landscape-led masterplanning and green infrastructure;
- detailed ecological surveys and habitat mitigation;
- site-specific flood risk assessment and sustainable drainage;
- new schools, healthcare provision and community facilities; and
- comprehensive design and phasing to integrate these measures.

This does not mean the allocation is necessarily unsound. Rather, it demonstrates that the Councils were prepared to allocate a strategically important site despite acknowledged constraints because they considered those constraints capable of being managed through subsequent planning stages.

The question is therefore not whether STR.2 is unconstrained, but whether the evidence adequately establishes the baseline against which those future mitigation measures are intended to compensate.

Existing Recreational Function and Community Value

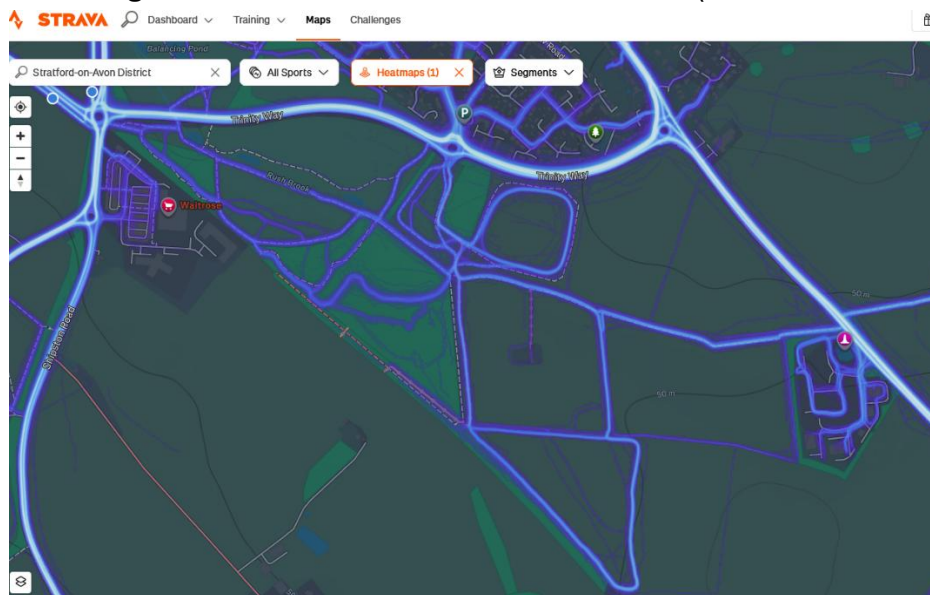
One notable omission from the evidence base is any site-specific assessment of the existing recreational, social and community value of the land proposed for allocation.

This omission is significant because the land performs a wide range of everyday community functions that extend well beyond formal recreation. The Public Rights of Way network and surrounding countryside are used for dog walking, running, walking, informal exercise, wildlife observation, nature appreciation and social interaction. For many residents of Trinity Mead, Bridgetown, Tiddington and surrounding neighbourhoods, the site represents the nearest accessible area of open countryside and provides one of the few opportunities for regular informal recreation immediately adjoining the urban area. As a result, the site functions not only as open space, but as an established community asset that supports physical activity, mental wellbeing and social cohesion.

The Councils acknowledge that the site contains an established network of Public Rights of Way and propose that these routes should be incorporated into future green infrastructure and active travel networks.

However, the published evidence appears to contain no visitor surveys, recreational-use studies, natural capital assessment, social value assessment or other empirical evidence quantifying these existing functions. Consequently, while the evidence proposes replacement green infrastructure as mitigation, it does not first establish the baseline recreational, social and wellbeing value of the resource that would be lost.

Figure 1. Existing recreational use of the STR.2 allocation (Strava Global Heatmap)



Replacement Green Infrastructure

The evidence assumes that the loss of existing countryside can be mitigated through the provision of new public open space, green infrastructure, biodiversity areas and recreational routes within the development.

Those proposals may deliver significant benefits.

However, they do not necessarily provide the same function as the landscape they replace.

Existing agricultural landscapes provide characteristics that are difficult to recreate through planned urban green infrastructure, including:

- extensive uninterrupted walking routes;
- openness and tranquillity;
- mature landscape character;
- opportunities for informal recreation;
- everyday dog walking and exercise; and
- an accessible countryside setting immediately adjoining the urban area.

The issue is therefore not whether replacement green infrastructure will be provided, but whether the evidence demonstrates that it will provide an equivalent recreational, social and wellbeing function to the landscape that currently exists.

Without first establishing the existing level of recreational use or community value, it is difficult to understand how the effectiveness of the proposed mitigation has been evaluated.

Matters for Examination

The Examination may therefore wish to consider:

- whether the existing recreational and community value of the site has been adequately assessed at the plan-making stage;
- what objective evidence demonstrates the current level of recreational use across the allocation;
- whether the proposed green infrastructure has been evaluated against the existing baseline rather than simply against policy requirements; and
- whether the evidence sufficiently demonstrates that replacement green infrastructure will provide an equivalent level of recreational, health and community benefit.

Evidence Reviewed

This review has been prepared using the principal evidence base supporting the South Warwickshire Local Plan, including:

- Regulation 19 Local Plan
- Sustainability Appraisal (including Appendices E, F and K)
- Strategic Site Selection Rationale (Annexe C)
- Sequential Test Topic Paper
- Infrastructure Delivery Plan
- Strategic Flood Risk Assessment
- Strategic Growth Location Assessments
- Other supporting technical evidence cited within the SWLP evidence base.