

South Warwickshire Local Plan (SWLP): Consultation Process and Public Participation

Potential Matters for Examination in Public

Draft Technical Review prepared for Trinity Mead Residents Group (SHAPE)–
version 2

20/08/2026

1. Context & Statutory Framework

The South Warwickshire Local Plan (SWLP) is being prepared jointly by Stratford-on-Avon District Council and Warwick District Council. The Regulation 18 Preferred Options consultation ran from 10 January to 7 March 2025, a period of eight weeks. The Preferred Options document was a substantial consultation exercise, containing 49 policy directions, 12 detailed policies, 12 potential New Settlement Locations and 24 potential Strategic Growth Locations.

The subsequent Regulation 19 Publication consultation is the final formal public consultation before submission of the Plan for independent examination. It runs from 21 July to 8 September 2026, a period of seven weeks. The Councils describe this as *‘the final opportunity for formal public engagement before submission and state that representations at this stage should address whether the Plan is legally compliant and sound’*.

The distinction between these stages is important. **Regulation 18 provided an opportunity to engage with the emerging strategy**, alternatives and potential locations for growth and to **influence the Plan** before the final strategy was settled. **Regulation 19 is a later and more constrained stage**: the Publication version contains the final growth strategy, final locations for growth and policies, and representations are principally directed towards legal compliance and soundness.

Policy context

The national policy framework applicable when the Regulation 18 consultation took place stated that the planning system should provide “*a platform for local people to shape their surroundings*” and that plans should be “*shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.*” NPPF 2024, paragraphs 15–16(c).

It states that the Council's approach to consultation should be appropriate to “*the stage of consultation*” and “*the localities they cover*”, and identifies a range of engagement methods including websites and social media, face-to-face events, emails and letters, local press, and, where appropriate, leaflets delivered to households.

For Development Plan Documents, the Statement of Community Involvement (SCI) further provides that at Regulation 18 the Council will use public notices and news releases, public alerts through Council social media, notifications to relevant persons, groups and organisations and those who have requested notification, and notification of Parish and Town Councils.

2. Core Lines of Inquiry

2.1 Effectiveness of Preferred Options Community Engagement: Wilmcote vs South Stratford

Potential policy/procedural issue

Whether the Councils took reasonable and effective steps, consistent with the NPPF requirement for “*early, proportionate and effective engagement*”, and with their commitments in the SCI, to ensure that residents affected by the proposed growth locations were made aware of the Regulation 18 consultation and had a meaningful and comparable opportunity to comment on the Preferred Options Plan.

Substantial differences are evident in the degree to which councils engaged affected residents, creating comparable opportunities for communities to engage with and respond to the Plan. The contrast is particularly significant because the communities with the highest levels of recorded participation subsequently saw their proposed sites removed from the Regulation 19 spatial strategy, while other sites with substantially lower levels of recorded participation progressed. This raises a legitimate question as to whether the Regulation 18 process provided communities affected by different growth proposals with a genuinely comparable opportunity to understand, scrutinise and respond to the emerging spatial strategy.

Regulation 18 engagement in Bearley & Wilmcote (Wilmcote Parish Council)

The available evidence indicates that **local awareness and mobilisation around the Bearley and Wilmcote proposal began well before the Regulation 18 consultation closed** and that Wilmcote Parish Council played an important role in bringing the proposal to residents' attention. Wilmcote Parish Council had:

- **published information alerting residents** that the SWLP was considering a potential new settlement in the Bearley/Wilmcote area, involving more than 6,700 homes
- **explained the significance** of the proposal
- **directed residents to the consultation material** and encouraged them to respond
- **organised a dedicated public meeting** at Wilmcote Village Hall on 8 February 2025, specifically to enable residents to understand the proposal and formulate their response
- highlighted the difficulty of navigating the SWLP consultation material and **offered assistance to residents**

The screenshot shows the Wilmcote Parish Council website. The main content area displays a news article titled "SOUTH WARWICKSHIRE LOCAL PLAN – REGULATION 19 REPRESENTATION". The article discusses the council's objection to the proposed removal of Wilmcote from the West Midlands Green Belt and its designation as a Local Service Centre. It includes an introduction, a list of six points, and a conclusion. The sidebar on the right contains several notices, with the following items highlighted in red boxes:

- SWLP objection template letter
- SOUTH WARWICKSHIRE LOCAL PLAN - UPDATE
- SWLP Update Meeting, Bearley 11 October
- No means no, say campaigners against proposed development
- PRESS RELEASE - SWLP VOTES
- Wilmcote Action Group response to SWLP

Figure 1: Wilmcote Parish council news from 2025. Highlighted items show the council's effort to alert residents

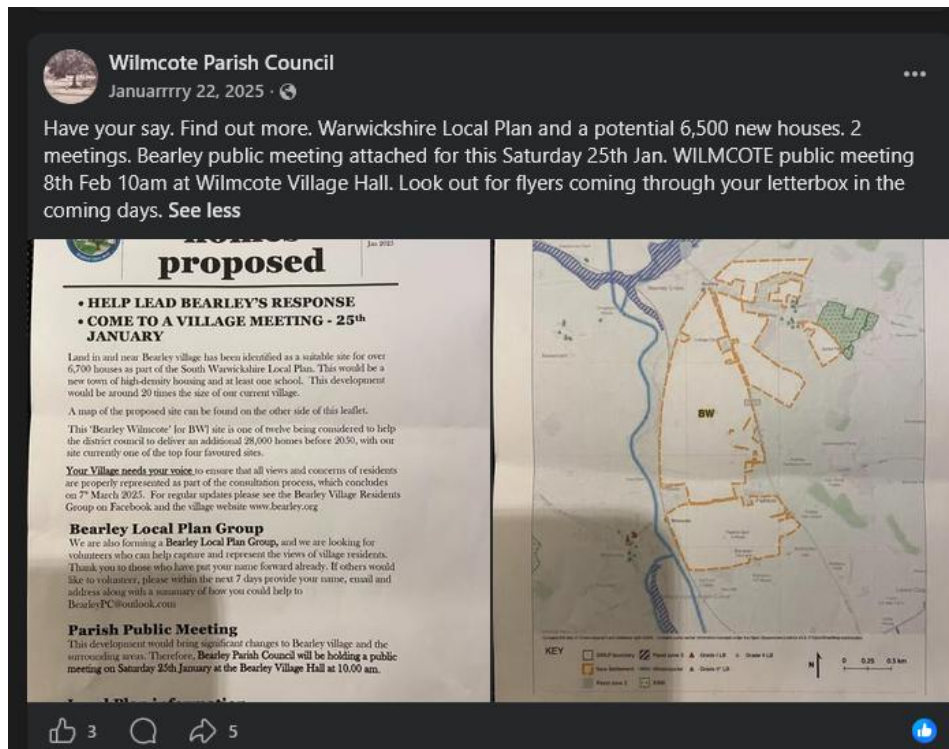


Figure 2: One of multiple social media posts by Wilmcote Parish Council informing residents about the regulation 18 consultation

This local mobilisation appears to have translated into substantial participation. The Regulation 18 Consultation Statement records **1,064 representations** concerning BW, of which **934 were objections**, together with a **petition signed by 234 people**. It also records that the Stratford consultation event at Maybird Shopping Park was attended by **many protesters from the Wilmcote community action group**. Taken together, this provides unusually clear evidence of a community that had become aware of the proposal, understood its potential significance, organised collectively and actively participated in the consultation. To put these numbers into context, we can compare the BW response numbers with representation numbers relating to other sites.

Table 1: A comparison of representations submitted to regulation 18 by proposed site

Location	Regulation 18 representations	Objections	Population used	Representations / 1,000 residents	Objections / 1,000 residents	Relevant local council position
BW – Bearley & Wilmcote	1064	934	1481	718	631	Object – Bearley PC and Wilmcote PC
LMA / E1 – Long Marston Airfield	360	95	1630	221	58	Support – Stratford Town Council supported E1
STR.2 / SG19 – East of Stratford	279	193	8337	33	23	Support in principle – Stratford Town Council
BID.1 / SG20 – Bidford	150	75	6370	24	12	Object – Bidford-on-Avon Parish Council

Note: Figures represent recorded representations, not verified individual residents; some may be from outside the affected area or multiple submissions by the same person; Population figures are based on 2021 Census data

The scale of the difference in recorded participation is striking. On a population-adjusted basis, BW generated approximately **22 times as many Regulation 18 representations per 1,000 residents¹ as South Stratford/SG19, and approximately 30 times as many as Bidford/SG20.** This is a substantial difference in recorded participation between communities affected by the proposed strategic growth locations and raises a question as to whether differences in local awareness and mobilisation contributed to the variation in consultation responses.

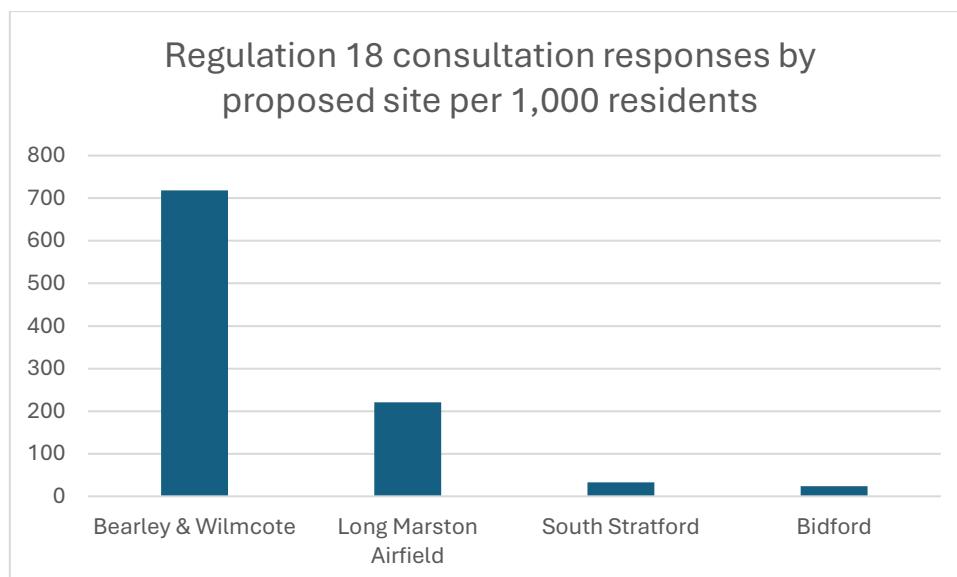


Figure 3: regulation 18 responses by proposed site, per 1,000 residents, source: preferred options consultation document

Regulation 18 engagement in South Stratford (Stratford Town Council)

The position appears materially different for the community affected by **SG19 / STR.2**. Stratford-upon-Avon Town Council was clearly aware of the proposal and submitted a substantive Regulation 18 response, **supporting** the principle of concentrating greenfield development into fewer, larger locations and considering parts of SG19 suitable, subject to a number of conditions. However, our review of the Town Council's public-facing communications has so far identified **no equivalent news item on the Town Council website and no Facebook post publicising the Regulation 18 consultation or drawing residents' attention to SG19 during the consultation period**. This contrasts with the documented actions of Wilmcote Parish Council, which actively brought the proposed development to the attention of its residents and facilitated a local response.

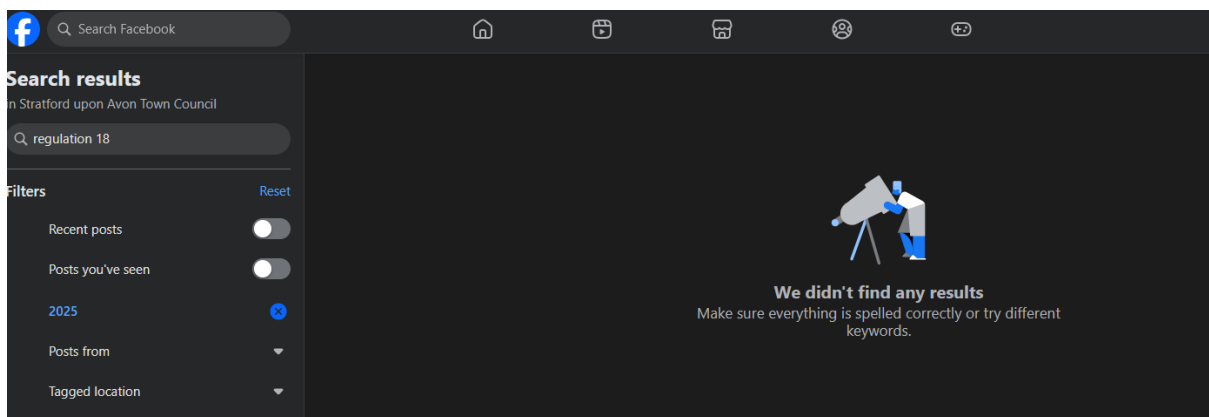


Figure 4: We could not find any social media posts from Stratford Town Council informing residents about the ongoing consultation

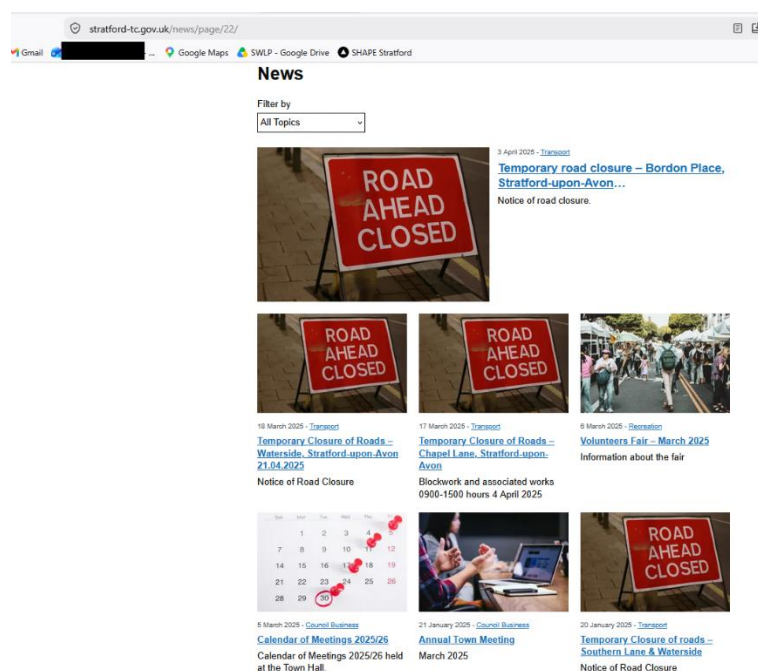


Figure 5: We could not find any news item from Stratford Town Council informing residents about the ongoing consultation

The relevant Parish and Town Councils were aware of the proposed growth locations and participated directly in the Regulation 18 consultation, but their engagement with their communities appears to have differed substantially. In **Bearley and Wilmcote**, Wilmcote Parish Council actively informed residents about the proposed development, explained its implications, directed residents to the consultation material, organised a dedicated public meeting and encouraged residents to respond. This was accompanied by exceptionally high participation: **1,064 representations and 934 objections** were recorded against BW.

The position in **South Stratford** was materially different. Stratford-upon-Avon Town Council submitted a substantive Regulation 18 response and **supported the principle of concentrating greenfield development into fewer, larger locations**, considering parts of SG19 suitable subject to conditions. However, no equivalent programme of resident-facing communication by the Town Council has so far been identified. Similarly, Bidford-on-Avon Parish Council **objected to SG20**, citing concerns including scale, infrastructure and public transport, but no comparable programme of resident mobilisation has been identified.

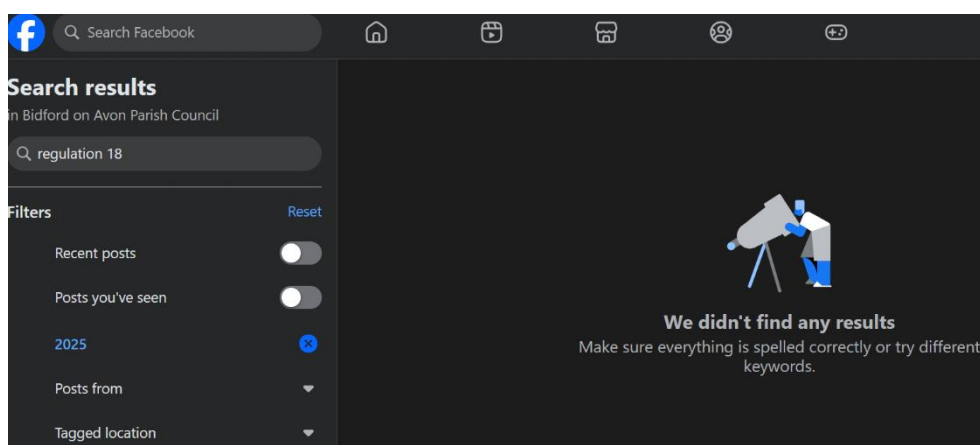


Figure 6: No evidence of Bidford parish council social media posts informing residents about regulation 18 in Bidford

This distinction is particularly significant given the subsequent outcomes. **BW generated by far the highest level of recorded participation and the proposed new settlement was subsequently removed from the Regulation 19 spatial strategy**, whereas **SG19/STR.2 and SG20/BID.1 progressed into the Publication Plan**. SHAPE's recent engagement with South Stratford residents has also found that a majority of those approached were unaware of the Local Plan or the scale of development proposed in their area; SHAPE members themselves did not become aware of the significance of the proposals until the Regulation 19 consultation commenced.

The evidence therefore raises an important question about the role of local councils in enabling effective community participation. **In BW, active local communication and mobilisation enabled residents to understand, organise around and respond strongly to the proposal. In South Stratford, no equivalent local mobilisation has**

been identified despite the Town Council being aware of and supporting SG19. The examination could therefore consider whether differences in local awareness and mobilisation contributed to the markedly different levels of recorded participation and, ultimately, to the different outcomes for the respective sites.

2.2 Effectiveness of Stratford District Council's regulation 18 engagement campaign

Potential policy/procedural issue

Whether the publicity undertaken by Stratford-on-Avon District Council was sufficiently targeted and effective to provide residents in communities affected by major growth proposals with a realistic opportunity to understand the scale and local implications of the proposals and participate meaningfully in the Regulation 18 consultation.

Stratford-on-Avon District Council was under a **statutory duty to publicise the Regulation 18 consultation**, and accordingly undertook wider publicity through social media, a dedicated website, promotional videos, press releases, newspaper advertising and a programme of public consultation events.

Effectiveness & Content of communications

However, the **reach and effectiveness of the wider publicity warrants consideration**. The Council's own figures suggest that social media generated relatively limited active engagement. Across Stratford District's channels, the consultation videos received 1,900 views for the Preferred Options explainer, 1,005 for the Growth Strategy video and 879 for the video explaining the interactive map and response process. On Facebook, the Council records **33 reactions, 2 comments and 71 shares** across 40,989 views; on X, **13 likes and 16 retweets** across 4,380 impressions; on LinkedIn, **6 reactions and 1 share** across 976 impressions; and on Instagram, **21 reactions, 3 comments and 17 shares** across 1,218 views. These figures do not establish the number of unique residents reached, but they do raise a legitimate question about whether social media was an effective means of communicating the significance of the proposals to affected communities, particularly where the proposed allocations involved thousands of homes.

The **content of the publicity** also merits consideration and may explain the limited interest from residents. For example, a Stratford-on-Avon District Council Facebook post dated 22 February 2025 presented the consultation through the question **"Is it true that 11,000 houses are planned for Stratford-upon-Avon town?"** The response stated that **"nothing is confirmed at this point"**, explaining that the locations shown on the Growth Strategy map were potential development sites which would be assessed for suitability and that not all would be required for housing. While factually accurate in describing the status of the Preferred Options proposals, this presentation provides

limited information about **what was actually being proposed in particular communities, the scale of individual strategic growth locations, or the potential consequences for residents living in or around them.** A resident encountering the consultation through this publicity would not necessarily understand that their locality might be affected by a strategic allocation involving thousands of new homes, potentially reducing the likelihood of meaningful engagement.



Figure 7: Example social media post from SDC about the regulation 18 consultation

There is also evidence from the subsequent experience of **SHAPE** that relatively low levels of engagement during the Regulation 18 consultation should not necessarily be interpreted as evidence of low public interest. The SHAPE Facebook group was created on **8 August 2026** and, by **20 August 2026**, had already attracted more than **160 members**. This demonstrates that, when residents understand the potential significance of development proposals to their community, there can be a rapid and substantial appetite for information and engagement. The contrast raises an important question: **did the relatively limited engagement recorded during the Regulation 18 consultation reflect a lack of public interest, or was it in part a consequence of residents not being sufficiently aware of the scale and local implications of the proposals?**

The Council's more traditional publicity methods also raise questions about **how it sought to reach residents who were not already engaged with the planning process.** The Consultation Statement records that printed posters were sent to libraries, while electronic copies were sent to Town and Parish Councils with an encouragement to print and display them locally or include them in parish publications or social media. Paper consultation documents and **postcard-size information leaflets** were also

made available at the designated deposit points, including all 15 South Warwickshire libraries. However, the Statement does **not identify any equivalent programme of targeted household leaflet or postcard distribution to residents living in or around the proposed strategic growth locations.**

This distinction is important. Making consultation material available **at libraries, Council offices and online**, or placing responsibility on Town and Parish Councils to reproduce and distribute posters, is not necessarily equivalent to **actively notifying the communities most directly affected by individual proposals.** This is particularly relevant given the scale and complexity of the Preferred Options document, which contained **49 draft policy directions, 12 draft policies, 12 potential new settlements and 24 potential strategic growth locations.** The Council itself recognised that the document was lengthy and technically complex.

Indeed, the Council's own record of feedback provides evidence that some of these methods may not have been sufficient in practice. Attendees reported that **some events had been inadequately publicised**, that some venues were not sufficiently advertised locally, and specifically raised **“inadequate notification for those who do not use the internet or read newspapers”**, with postal notification to all residents suggested as an alternative. Concerns were also raised about accessibility for people without access to a computer.

This raises an important question about whether the **methods chosen were reasonably capable of reaching and informing the residents most directly affected by individual growth proposals**, particularly those who were not already engaged with planning, social media or local political networks. **Did the publicity merely make the existence of the consultation known, or did it provide affected communities with a realistic opportunity to understand the scale and local implications of the choices being consulted upon and to participate effectively?**

2.3 Timing, Availability and Scrutiny of Regulation 19 Evidence

Potential policy/procedural issue

Whether the timing and volume of new evidence provided a realistic opportunity for meaningful public scrutiny during the Regulation 19 period.

The Technical Evidence Register shows a substantial volume of evidence being completed or updated in the three months immediately preceding the Regulation 19 consultation. **At least 37 evidence entries are recorded as completed in May 2026**, with a further **20 entries completed in June or July 2026.** These include evidence directly relevant to the proposed growth locations and their capacity, sustainability, transport impacts, infrastructure requirements, heritage, viability and deliverability. These entries consist of **reports, appendices or site-specific assessments, addenda**

and supplementary documents, which consultees may need to consider alongside the principal reports.

Evidence base volume & timing

Moreover, meaningful scrutiny of this evidence cannot be undertaken simply by reading the documents published in May–July 2026 in isolation. In many cases, **consultees need to consider the earlier evidence base alongside the new or revised material** in order to understand what has changed, why it has changed and what effect those changes have had on the Plan and the selection or assessment of development locations. This includes the earlier consultation material and the Indicative and Preferred Options consultation documents published from November 2024 onwards. An indicative review of these earlier consultation documents, together with the subsequent Regulation 19 evidence, **represents a substantial additional body of material that must be understood if consultees are to assess how the Plan has evolved and whether the evidence supporting its current form is robust.**

The Council's own evidence register illustrates this iterative process: the July 2026 Growth Strategy Topic Paper builds on previous Growth Topic Papers; the Green Belt Review Stage 1 has been revised and supersedes the October 2024 version; and the Regulation 19 HELAA records changes following a further rerun of the methodology and datasets. The presence of numerous addenda and supplementary documents further illustrates that the evidence base has continued to develop and be amended over time.

The Regulation 19 consultation opened on 21 July 2026 and closes on 8 September 2026, giving consultees **just seven weeks to undertake this exercise**. In practical terms, this requires consultees **not only to review a substantial body of newly completed evidence**, but also, where relevant, to revisit earlier evidence and compare it with the updated material in order to understand the evolution of the Plan and its evidential basis.

The timing is particularly significant because the **consultation period encompasses the whole of August**, including the school summer holiday and the main period for annual leave. This reduces the practical opportunity available to residents, community groups and other consultees, many of whom engage on a voluntary basis, to undertake this kind of detailed comparative review of a large and technically complex evidence base.

The issue is therefore not simply whether seven weeks constitutes a formally adequate consultation period. It is whether, **given the volume of evidence completed or materially updated** immediately before Regulation 19, the need to consider that evidence alongside earlier iterations and consultation documents dating back to November 2024, the additional addenda and supplementary material, and the **timing of the consultation across the summer holiday period**, consultees **had a realistic**

opportunity to understand the evidential changes and formulate fully informed representations on the soundness and legal compliance of the final Plan.

References

1. **Ministry of Housing, Communities and Local Government (2024), *National Planning Policy Framework***. Revised 12 December 2024; amended 7 February 2025.
Paragraphs 15–16(c) are the relevant provisions concerning early, proportionate and effective engagement.
[National Planning Policy Framework – GOV.UK](#)
2. **South Warwickshire Local Plan (2023), *Updated Statement of Community Involvement***.
Sets out the Councils' approach to community involvement and consultation in the preparation of Local Plans and Development Plan Documents, including the Regulation 18 stage.
[South Warwickshire Local Plan – Updated Statement of Community Involvement 2023](#)
3. **Stratford-on-Avon District Council and Warwick District Council (2025), *South Warwickshire Local Plan – Preferred Options 2025***.
Regulation 18 consultation document, published for consultation from 10 January to 7 March 2025. The document contains the draft policies, policy directions, Strategic Growth Locations and potential New Settlement Locations referred to in the review.
[South Warwickshire Local Plan – Preferred Options 2025](#)
4. **South Warwickshire Local Plan (2026), *Preferred Options Consultation Statement***. Published 13 March 2026.
Contains the Council's account of the consultation methods used, consultation-event feedback, numbers and types of representations received, and summaries of representations.
[Preferred Options Consultation Statement – South Warwickshire Local Plan](#)
5. **South Warwickshire Local Plan (2026), *Technical Evidence***.
Council evidence-base index containing the individual technical reports and assessments referred to in the review, including the updated Growth Strategy Topic Paper, Green Belt Review, HELAA, Sustainability Appraisal and other Regulation 19 evidence.
[South Warwickshire Local Plan – Technical Evidence](#)
6. **South Warwickshire Local Plan (2026), *South Warwickshire Local Plan Growth Strategy Topic Paper***. July 2026.
The July 2026 paper builds on the earlier Growth Topic Papers and sets out the derivation of housing and employment requirements, development of the

preferred growth strategy and the rationale for site selection.

[Growth Strategy Topic Paper – South Warwickshire Local Plan](#)

7. **South Warwickshire Local Plan (2026), *The South Warwickshire Green Belt Review – Stage 1 (Updated)***. May 2026.

Revised following changes in national Green Belt policy, including the introduction of the concept of “grey belt”; the updated Stage 1 supersedes the October 2024 version.

[Green Belt Review – South Warwickshire Local Plan Technical Evidence](#)

8. **South Warwickshire Local Plan (2026), *Housing and Economic Land Availability Assessment (HELAA) – Publication Version***. January 2026 re-run with updated data and site list.

The Council identifies separate HELAA A and B results for the Regulation 19 Publication version and also retains the November 2024 HELAA material as superseded evidence.

[South Warwickshire Local Plan – HELAA Results](#)

9. **South Warwickshire Local Plan (2024), *The South Warwickshire Local Plan Emerging Spatial Growth Strategy – As at the Preferred Options Consultation***. November 2024.

This is particularly relevant to Section 2.3 because it represents the earlier stage of the spatial-growth evidence against which subsequent changes can be assessed. The Council describes it as building on the Growth Topic Paper prepared for the Issues & Options consultation.

[South Warwickshire Local Plan – Technical Evidence Index](#)

10. **South Warwickshire Local Plan (2024), *The New Settlement Assessment – As at Preferred Options***. November 2024.

Sets out the methodology and assessment of the potential New Settlement locations at the Preferred Options stage.

[South Warwickshire Local Plan – Technical Evidence Index](#)

11. **South Warwickshire Local Plan (2024), *Housing and Economic Land Availability Assessment (HELAA) Methodology and Summary of Results – As at the Preferred Options Consultation***. November 2024.

Includes the Preferred Options-stage HELAA methodology and associated site-assessment results. The Council now identifies this November 2024 material as superseded by the later Regulation 19 re-run.

[South Warwickshire Local Plan – HELAA Results and Earlier Evidence](#)

12. **South Warwickshire Local Plan (2026), *Regulation 19 Sustainability Appraisal Report and associated appendices/addendum***. July 2026.

This is not discussed at length in the current review, but it forms part of the later

evidence base referred to in Section 2.3 as evidence concerning the assessment and selection of growth locations. The Council lists the main report, non-technical summary, addendum and Appendices A–K as part of the July 2026 Regulation 19 evidence.

[Regulation 19 Sustainability Appraisal – South Warwickshire Local Plan Technical Evidence](#)