

EVIDENCE

Sustainability of STR.2

The South Warwickshire Local Plan proposes approximately 2,700 homes at STR.2, east of Stratford-upon-Avon. The Council's Sustainability Appraisal identifies significant adverse effects associated with the allocation, including climate change and landscape impacts, together with effects relating to flood risk, biodiversity, pollution and natural resources.

SHAPE's review asks a fundamental question: does the evidence demonstrate that STR.2 is genuinely a sustainable location for strategic-scale growth — or does its sustainability case depend too heavily on future infrastructure, mitigation and assumptions that remain uncertain?

At a glance

The sustainability case for STR.2 is not simply a question of whether mitigation can eventually be provided. The strategic question is whether the location itself represents an appropriate and sustainable choice when its environmental constraints, accessibility, carbon implications, flood risk and infrastructure requirements are considered together.

The review identifies six particularly important issues:

- **Significant adverse sustainability effects** remain in the Council's own Sustainability Appraisal.
- **Accessibility is not the same as proximity:** the River Avon, A46 and other barriers constrain realistic walking, cycling and public transport connections.
- **Environmental harm may be being mitigated after the location has already been selected**, rather than avoided through the choice of a less constrained location.
- **Cumulative effects** from STR.2, SG18, Long Marston Airfield and associated infrastructure may be greater than the effects of individual allocations considered in isolation.
- **Carbon evidence has important limitations**, including questions about infrastructure emissions and the comparability of the assessment with reasonable alternatives.
- **Flood resilience and wastewater capacity** remain material constraints requiring further infrastructure and assessment.

1. The Council's own appraisal identifies significant adverse effects

The Regulation 19 Sustainability Appraisal identifies substantial adverse sustainability effects associated with STR.2. These include significant adverse effects for **climate change and landscape**, alongside adverse effects relating to flood risk, biodiversity, pollution and natural resources.

Importantly, these effects are identified even after proposed mitigation has been taken into account. The issue for the Examination is therefore not simply whether mitigation is technically possible, but whether the scale and location of STR.2 remain justified once those residual effects are properly weighed.

Key finding

The Council's own evidence does not present STR.2 as a location without significant sustainability disadvantages. The question is whether those disadvantages have been sufficiently justified against the reasonable alternatives.

2. Did sustainability actually inform the choice of STR.2?

Sustainability Appraisal is intended to inform the preparation of the Plan and the choice between reasonable alternatives. The evidence should therefore show a clear chain from the sustainability characteristics of alternative locations, through assessment of their effects, to the eventual selection and scale of STR.2.

The Council's methodology confirms that reasonable alternatives were considered. This makes the comparative evidence particularly important. Where STR.2 has significant environmental disadvantages, the Examination should be able to see why those disadvantages were considered acceptable compared with the alternatives.

There is also a concern where mitigation is used to reduce the apparent disadvantages of the preferred location, while equivalent mitigation is not given

the same weight when comparing alternatives.

The key question for the Inspector

Can the Council demonstrate, using comparable evidence, that sustainability considerations materially informed both the selection of STR.2 and the decision to allocate approximately 2,700 homes there?

3. Proximity does not necessarily mean sustainable accessibility

A major part of the sustainability case for STR.2 rests on its proximity to Stratford-upon-Avon and the potential for walking, cycling and public transport connections.

But geographical proximity is not the same as practical accessibility. STR.2 is separated from the existing urban area by the **River Avon, A46 and other strategic roads**. For approximately 2,700 homes, the relevant question is whether residents can make everyday journeys to employment, schools, services, the railway station and the town centre conveniently, safely and directly without relying on a private car.

If walking and cycling routes are indirect, require difficult crossings or depend upon infrastructure that has not yet been delivered, the existence of a nominal connection does not necessarily provide a genuine alternative to car travel.

Why this matters

If accessibility has been assessed primarily through geographical distance rather than realistic journey conditions, the sustainability and carbon performance of STR.2 could be overstated.

4. Mitigation is not the same as avoiding environmental harm

The Regulation 19 SA identifies significant adverse effects for STR.2 including landscape and climate change, together with effects relating to biodiversity, flood risk, pollution and natural resources.

The evidence proposes a range of mitigation measures, including landscape buffers, green infrastructure, biodiversity measures, sustainable transport and flood-risk measures.

These measures may reduce impacts. But they do not answer the strategic question of whether some of those impacts could have been avoided by choosing a different location in the first place.

This distinction becomes particularly important where the effects arise from the scale of development itself. A development of approximately 2,700 homes changes the character and function of a substantial area of countryside and creates associated infrastructure, movement and urbanisation effects.

The strategic issue

The Examination should establish whether environmental constraints genuinely influenced the spatial choice — or whether the location was

selected first and its consequences were then addressed through mitigation.

5. STR.2 cannot be assessed in isolation

STR.2 forms part of a much wider concentration of strategic growth around Stratford-upon-Avon, including **SG18, Long Marston Airfield and associated infrastructure**.

The combined environmental consequences may therefore be materially greater than those associated with each allocation individually. This is particularly relevant to the cumulative effects on:

Landscape & settlement

Cumulative urbanisation of Stratford's surrounding countryside.

Carbon & transport

Combined vehicle movements, modal split and strategic highway requirements.

Biodiversity

Ecological connectivity and the combined development footprint.

Flood risk & water

Drainage, the River Avon and cumulative pressure on water infrastructure.

Key concern

Mitigation that appears adequate for STR.2 in isolation may not remain



adequate when the wider Stratford growth strategy and its infrastructure are considered together.

6. The carbon evidence still requires scrutiny

The Council produced additional carbon evidence in May 2026, including Bioregional's assessment of the preferred Scenario Golf strategy. This provides useful additional information about transport-related carbon emissions.

However, the review identifies three important limitations.

- The detailed Bioregional assessment was undertaken for the preferred sites rather than being applied consistently across reasonable alternatives.
- The assessment appears not to include the embodied carbon of major enabling infrastructure such as the SWRR and associated highway structures.
- The transport methodology relies on nationally averaged commuting distances rather than modelling likely destinations from each individual strategic site.

These issues matter because the carbon consequences of STR.2 are closely linked to where residents travel, how they travel and the infrastructure required to make the allocation function.

The key question

Does the May 2026 carbon evidence provide a complete and sufficiently robust basis for concluding that the scale and location of STR.2 are compatible with the Plan's climate and net-zero objectives?

7. Flood risk is a strategic resilience issue

The latest Level 2 Strategic Flood Risk Assessment identifies material flood-risk constraints affecting STR.2, including both fluvial and surface-water risk.

Although most of the allocation lies within Flood Zone 1, the SFRA identifies **Flood Zone 3b within the site** and notes that the Flood Map for Planning does not represent fluvial flood risk in the upper reaches of Rush Brook.

4.9%

of the site within the
high-risk surface-water
category

10.3%

affected when the low-
risk category is included

1.2m+

potential flood depths
identified in some
locations

Climate change increases the concern. The SFRA estimates that the area affected by surface-water flooding increases under the climate-change scenario and describes STR.2 as **“highly sensitive” to increases in rainfall**.

Important questions also remain about Rush Brook, existing culverts, safe access and drainage. Further detailed hydraulic modelling is expected at the later Flood

Risk Assessment stage.

Why this matters

For a strategic allocation of approximately 2,700 homes, flood resilience is not simply a matter of designing individual houses. The Examination should establish whether safe access, drainage and flood behaviour are sufficiently understood before the strategic allocation is relied upon.

8. Wastewater capacity is already under pressure

STR.2 would add substantial growth to a wastewater catchment which the Council's latest Water Cycle Study identifies as already under pressure.

The Stage 2 Water Cycle Study forecasts **11,142 dwellings** being served by Stratford-Milcote Wastewater Treatment Works during the Plan period. It concludes that the works are likely to be close to or exceed their permitted flow and identifies **zero estimated spare hydraulic capacity** following planned development.

11,142

dwellings forecast to be served by
Stratford-Milcote WwTW during the
Plan period

0

estimated spare hydraulic capacity
following planned development

Water quality is also relevant. The Water Cycle Study identifies the potential for a greater than 10% deterioration in water quality for one or more assessed pollutants under the future-growth scenario and identifies phosphate as an amber constraint requiring further intervention.

The evidence also records an average of **35.7 storm-tank overflow spills per year during 2023–25** at Stratford-Milcote, above the Water Cycle Study's threshold for investigation.

The strategic issue

The sustainability of STR.2 depends partly upon additional wastewater infrastructure and treatment capacity being available as development comes forward. The Plan therefore needs to demonstrate that these interventions will be delivered when required.

9. A sustainable development cannot depend on infrastructure arriving later

A recurring theme across the evidence is that the sustainability performance of STR.2 depends materially upon future infrastructure. This includes sustainable transport connections, strategic highway infrastructure, drainage and wastewater capacity.

The concern is particularly acute if early phases of development can be occupied before the infrastructure on which the sustainability case depends is operational.

Sustainable development therefore requires more than a list of infrastructure that

might eventually be provided. The Plan needs to demonstrate that the necessary infrastructure will be available at the point it is required and that its delivery can be secured alongside growth.

The central concern

If the infrastructure required to create a sustainable pattern of development systematically follows rather than accompanies housing growth, the sustainability case for the allocation is weakened.

What does the evidence mean for STR.2?

The issue identified by this review is not that STR.2 can never be developed or that every environmental impact is incapable of mitigation.

The more fundamental question is whether the evidence currently demonstrates that **approximately 2,700 homes at STR.2 represent an appropriately sustainable spatial choice**, when the site's environmental constraints, physical severance, carbon implications, cumulative effects, flood risk and wastewater requirements are considered together.

The Sustainability Appraisal itself identifies significant adverse effects. The sustainability case then relies on mitigation, future infrastructure and assumptions about how residents will travel and how environmental

constraints will be managed.

The Examination should therefore establish whether these matters have been sufficiently resolved at the strategic-plan stage, and whether the evidence demonstrates why STR.2 remains preferable to reasonable alternatives despite its identified sustainability disadvantages.

Questions for the Examination

1. Site selection

How did the significant adverse sustainability effects identified for STR.2 influence the decision to select and scale the allocation?

2. Reasonable alternatives

Can the Council demonstrate a genuinely comparable sustainability assessment of STR.2 against reasonable alternatives?

3. Accessibility

Do the proposed walking, cycling and public transport connections provide a realistic alternative to private-car travel, taking account of the River Avon, A46 and other physical barriers?

4. Carbon

Does the carbon evidence capture the full consequences of the infrastructure required to support STR.2, and does it permit a reliable comparison with reasonable

alternatives?

5. Flood resilience

Are the flood behaviour of Rush Brook, culvert blockage, safe access and climate-change impacts sufficiently understood at the strategic stage?

6. Water and wastewater

Can the Council demonstrate that the wastewater infrastructure and treatment capacity required for STR.2 will be available when needed, without increasing pressure on the receiving water environment or storm overflows?

7. Cumulative effects

Has the combined effect of STR.2, SG18, Long Marston Airfield and associated infrastructure been assessed sufficiently to understand the consequences of the wider spatial strategy?

Potential soundness issue

If the evidence cannot demonstrate that sustainability materially informed the selection and scale of STR.2, or if its sustainability performance depends upon future infrastructure and mitigation which remain uncertain, there is a credible concern that the allocation has not yet been shown to represent an appropriately justified and sustainable spatial strategy.

Read the full technical review

Our evidence review draws heavily on a detailed report prepared by Stratford Climate Action, which examines the sustainability implications of the SWLP and its proposed strategic growth around Stratford-upon-Avon.

**Download our full review
(PDF)**

**View the Stratford Climate Action
report**