

Response and Comment for Section 8 Site Proposals - Reference STR 2.

Theme; The Regulation 18 Process in 2025 for STR2 / SG19 was illegal.

Why is this plan not legal and not sound in relation to site proposal STR 2 / SG19 ?

Failure in earlier consultation. The regulation 18 consultation in relation to STR2 / SG19 utterly failed, both in terms of the legal and the planning policy aspects.

Reasons Why This Is the Case

Introduction

Section 18 of the The Town & Country Planning (Local Planning) (England) Regulations 2012 (a UK statutory instrument passed by parliament), states that a local planning authority must notify local residents of the subject of the local plan. The National Planning Policy Framework, extant in 2025, states that plans should be shaped by early, proportionate and effective engagement.

In summary this means; residents must be told about a plan, that should be with good notice, be of a level equivalent to the scale and impact of the plan, be applied fairly across the area and ensure as many residents are reached as possible with the relevant information.

In the case of the SWLP, engagement was early, but it wasn't proportionate or effective. A plan to the scale of the one proposed by SWLP demanded a publicity and public engagement effort which far outstripped what was in fact enacted.

The judicial approach in relation to failure for authorities to conduct a consultation effectively, required by law, is to consider failures that undermine the ability of consultees to participate meaningfully, can render a decision unlawful. In addition to the statutory legislation significant amounts of UK case law also exist on this subject that underline the primary legislation.

The Evidence

Anecdotally, the vast majority of residents of south Stratford, in the vicinity of STR 2 / SG19 have stated they knew nothing of the plan prior to the beginning of August 2026 - and the start of the regulation 19 consultation. The evidence to support South Stratford's residents lack of knowledge, due to non proportionate and non effective notification, and therefore prove the regulation 18 consultation in respect of STR 2 was illegal, is as follows;

1. Some Areas Affected by the Plan Were "More Equal" Than Others

Unequal and disproportionate notice and engagement were made by the district council and councillors in relation to the preferred sites consultation. The table and chart below shows residents in Bearley and Wilmcote clearly had been given a much greater awareness of the plan prior to, and during regulation 18 consultation. This courtesy should have been applied equally and fairly to all residents locations in the vicinity of all proposed sites. This demonstrates the lack of proportionality in the District Council's engagement.

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
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

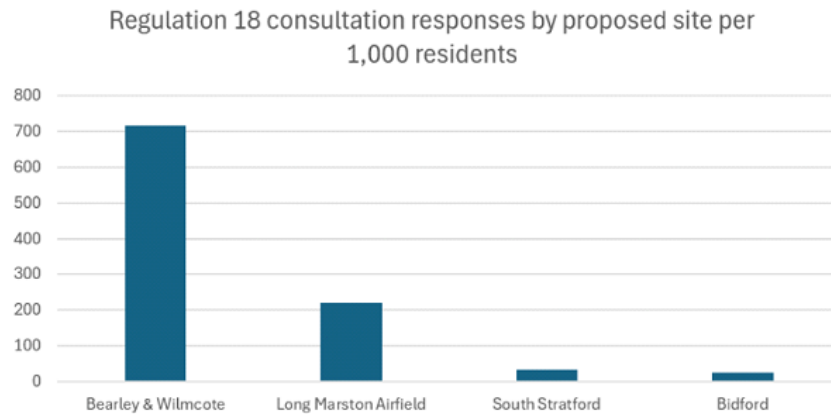


Figure 3. BW generated 22 times as many representations per 1,000 residents as STR 2, and 30 times more than Bidford.

Figure 3. Regulation 18 consultation responses by proposed site per 1,000 residents.

2. The District Councils Publicity Was Not Effective

2.1) Stratford-on-Avon District Council was under a statutory duty to publicise the Regulation 18 consultation and undertook wider publicity through social media, a dedicated website, promotional videos, press releases, newspaper advertising and public consultation events. Publicity did take place, but I submit the methods used were insufficiently targeted, accessible and informative to reach residents affected by major strategic growth proposals. The Council's own figures suggest relatively limited active engagement with its social-media publicity. The population of Stratford Upon Avon district is c140,000 people. 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, there were 13 likes and 16 retweets across 4,380 impressions. LinkedIn recorded 6 reactions and 1 share across 976 impressions, while Instagram recorded 21 reactions, 3 comments and 17 shares across 1,218 views. We have to remember the “views” figure for each of the different social media does not represent individuals reached. One person could have viewed each piece multiple times, some of those could have been officials and councillors who already knew about the plan. These figures do not establish the number of unique residents reached. However, I suggest social media alone was not an effective means of communicating the significance of the proposals to affected communities, particularly where individual allocations involved thousands of homes.

2.2) 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. How many people in 2026 visit libraries? The data shows visits have decreased from 48% of people visiting a library at least once a year in 2005, to 25% visiting at least

once a year in 2024. Bearing in mind the consultation ran for 6 weeks, only 1/8 of the year, this means as little as only 3% of Stratford's residents could have visited a library once during the consultation period. How many of those will have seen a leaflet or poster about the plan, when it is one of many on display in a library at any one time ?

2.3) No equivalent programme of targeted household leaflet or postcard distribution to residents, living in or around the proposed strategic growth locations, has been identified. No programme of placing large signage, or adverts, in prominent locations has been identified. To draw a comparison, at the cost of only £180 and combined c20 hrs work, members of a local campaign group have directly leafleted around 2000 properties in around 1 week to raise awareness of the plan during the regulation 19 consultation period.

2.4) Stratford District Council provided materials to town and parish councils to pass onto their constituents to raise awareness of the plan and regulation 18. Research has identified in relation to the Stratford Town Council (the authority that covers ST2 / SG19) that this strategy of delegation has failed. Stratford Town Council have not made one single post on their official facebook pages about regulation 18, or even the current regulation 19. Stratford Town Council were well aware of regulation 18 as they submitted a response to the consultation themselves, supporting SG19 / STR2, but they failed to make any efforts to ensure the residents they serve were aware.

2.5) I submit that over reliance on outdated public communication methods combined with lack of engagement across different levels of authorities, in some cases none, have severely undermined the effectiveness of the regulation 18 consultation in respect of STR 2 / SG19, to the point that it should be considered illegal.

3. The District Councils Publicity Was Not Just Ineffective, It Was Misleading

3.1) The fact of publicity itself is not just important, but the actual content of this publicity is crucial to ensuring an effective engagement as part of a consultation process. The below screen shot from facebook captured in August 2026 was a post from Stratford District Council posted in Feb 2025, during the live period of the regulation 18 consultation.



Figure 4. Stratford-on-Avon District Council Facebook post, February 2025.

3.2) These official statements are factually accurate, however when considering the purpose of the regulation 18 consultation, they are misleading. The exam question asked of people on the consultation response pages about STR2 / SG19 was; "Do you agree with the proposed strategic growth location being considered for inclusion in the plan ?". This was the same question for all strategic growth locations across the SWLP. The answers above are misleading, I submit they should have stated words to the effect; "there may be thousands of houses built around Stratford due to the government targets we have to meet. We need residents to consider, and submit their views, to the consultation as if plans were confirmed and would be enacted for any strategic growth location that could affect you". The above answers given by Stratford District Council will have left the public with an entirely false impression as to the seriousness and likelihood that they and their communities would be affected.

Conclusion

The evidence detailed above demonstrates clearly, in relation to STR 2 / SG19 that Stratford District Council failed in its legal duty to notify local residents in a proportionate and effective way during the regulation 18 consultation process. The key evidence that demonstrates this is;

- The number of responses to the consultation 18 in relation to SG19 / STR2 as a proportion of South Stratford population is a key indicator of how many residents were aware, or more to the point, not aware.
- A social media campaign that relied just upon the Districts Councils own Social Media channels, without a wider programme of social media advertising across more highly utilised social media channels, was ineffective.
- A reliance on delegation to lower council authorities, who in the case of Stratford Town Council, failed to make any efforts to inform the public they serve, was ineffective.
- A reliance on outdated publicity through public facilities that are in 2026 little used by the public as a whole, was ineffective.
- Misleading social media messaging that would have discouraged people from understanding the importance for them to find out more and make a submission.

A plan being proposed for 25 years, potentially doubling the number of houses around Stratford Upon Avon District, requiring 100's of millions in infrastructure investment, threatening high grade agricultural land, and putting a risk highly valued natural sites, should have demanded publicity of a commensurate scale in order to make it proportionate and effective. The residents of South Stratford affected by STR 2 / SG19 did not get this during regulation 18.

The outcome of failed effective consultation at the regulation 18 stage has led to STR 2 / SG19 being included in the plan to a level of 2727 houses. Whereas areas who were favourably engaged, and had a fair chance to respond, saw either a complete removal of their site, or reduction in numbers, post the regulation 18 consultation.

I submit that in relation to STR2 / SG19, due to the proven illegality and policy failures by Stratford District Council with the regulation 18 process, which are only now apparent, the site should be completely removed from the plan, or at the very least have a substantial reduction in the numbers proposed for the site.