

## **Stratford Climate Action, Evaluation of SWLP (Version 3, 26<sup>th</sup> Aug 2026)**

*This evaluation of the SWLP has been completed by Stephen Norrie for the benefit of Stratford Climate Action members and other members of the public interested in responding to the Regulation 19 Consultation on the SWLP, ending September 8<sup>th</sup> 2026.*

*The document is based on extensive research, done over a short period of time, and learnings from other campaign groups, all of which is ongoing. Earlier versions of the document have been circulated publicly for comment and collective input. This latest dated version supersedes earlier/undated versions.*

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### **1. Executive Summary**

This response addresses the South Warwickshire Local Plan (SWLP) at Regulation 19 stage. Our representation focuses on climate change and sustainable transport, areas where the Plan is fundamentally flawed. We do not challenge the housing numbers; we challenge whether the Plan can deliver its own stated climate objectives.

#### **The Core Problem**

The SWLP's stated strategy – 'Sustainable Travel and Economy' – is not delivered in practice. On the Stratford side of the Plan area, the strategy is overwhelmingly road-dependent. Major allocations at Long Marston Airfield (LMA) and south of Stratford (STR.2), comprising approximately 7,000 homes, are entirely dependent on the delivery of a new Stratford bypass costing between £190 million and £630 million. Few major

sites have rail access. Little new work has been done on active travel infrastructure in Stratford District, and this is unlikely to be delivered. The Plan's stated commitment to 'prioritising walking, cycling and public transport' is contradicted by its actual spatial choices.

## Legal Failings

The Sustainability Appraisal (SA) is not legally compliant with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

Specifically:

1. **Failure to assess significant effects:** The SA fails to identify, describe, or evaluate the carbon emissions from the Stratford bypass and transport infrastructure in general, despite these being central to the Plan's deliverability (contrary to Regulation 12.2).
2. **Failure to assess reasonable alternatives:** The SA does not adequately assess reasonable alternatives, including:
  - Alternative sites with better rail connectivity
  - The reopening of the Stratford-Honeybourne railway line
  - Spatial options that would reduce car dependency
  - A higher proportion of development in new settlements near employment centres (contrary to Regulation 12.2).
3. **Failure to consider the Plan's own objectives:** The SA does not evaluate whether the proposed spatial strategy actually delivers the Plan's stated aim of locating development in places that facilitate sustainable travel, rendering it incapable of informing the Plan's development (contrary to Regulation 12.2 and government guidance on SA).

## Soundness Failings

The Plan is unsound on at least three of the four NPPF tests (Paragraph 36):

1. **Not justified:** The SA and technical evidence do not provide a credible basis for the spatial choices made. Assessment of carbon emissions is incomplete, methodologically flawed, and in places produces absurd results (e.g. in the Bioregional reports).
2. **Not effective:** The Plan's housing trajectory depends on infrastructure—particularly the Stratford bypass—that has no secured funding and uncertain deliverability. The Councils' own costings range from £190 million to £630 million, and no route has yet been identified. If the bypass is not delivered, thousands of homes cannot be built.
3. **Not consistent with national policy:** The Plan's road-dependent strategy contradicts the 2024 NPPF's requirements to reduce greenhouse gas emissions through location and design (paragraph 164) and to focus development in sustainable locations (paragraph 110). It also contradicts the national Transport

Decarbonisation Plan, which prioritises modal shift to public and active transport over private car dependency.

### **Remedy Sought**

For these reasons, the SWLP should be found unsound and not legally compliant. We request that the Plan be withdrawn and re-prepared, with:

1. A legally compliant Sustainability Appraisal that properly assesses the climate impacts of infrastructure and transport choices.
2. Genuine consideration of reasonable alternatives, including the reopening of the Stratford-Honeybourne railway line.
3. A spatial strategy that delivers the Plan's own stated commitment to sustainable travel, rather than contradicting it.

## **2. Basis of evaluation**

A Sustainability Appraisal (SA) is a legal requirement for Local Plans, and SAs must conform to standards set out by The Environmental Assessment of Plans and Programmes Regulations of 2004, also known as the SEA (Strategic Environmental Assessment) Regulations.<sup>1</sup> If a plan is produced that is not accompanied by an SA meeting these standards, it is not legal. According to these regulations, an SA must 'identify, describe and evaluate the likely significant effects on the environment of (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.' (Regulation 12.2.) These effects include effects on climate change (Schedule 2). The SA must include a broad range of information (set out in Schedule 2) insofar as it is reasonably required to form a judgement on the extent of these impacts, on the basis of 'current knowledge and methods of assessment' (Regulation 12.3). The SA is not supposed to be a box-ticking exercise, but an ongoing appraisal that informs the choices made in the development of the plan at every stage.<sup>2</sup>

The Sustainability Appraisal is non-compliant with the aforementioned regulations in several ways:

1. There is no account of the carbon emissions associated with transport infrastructure, and in particular, the Stratford Bypass, though these will certainly be 'significant'. There is no account of the transport emissions associated with

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<sup>1</sup> 'Environmental Assessment of Plans and Programmes', 2004, <https://www.legislation.gov.uk/uksi/2004/1633/contents>, accessed 22/8/2026.

<sup>2</sup> 'Guidance: Strategic Environmental Assessment and Sustainability Appraisal', [www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal](http://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal), accessed 25/8/2026.

- new settlements in the SA, and no credible account elsewhere in the technical evidence.
2. The carbon emissions from transport and infrastructure associated with several reasonable alternatives are not identified, described and evaluated. In particular:  
a) sites (and strategic options) not incurring the carbon emissions associated with the plans for extensive road infrastructure set out in Stratford District; and  
b) the reopening of the Stratford-to-Honeybourne railway line.
  3. Although a Sustainability Appraisal has been published at every stage of consultation, the SA documents (and other reports on carbon emissions) do not inform the SWLP in a manner that takes into account its objectives at a level appropriate to the stage of the plan in the decision-making process (Reg. 12.3).

In addition to legal requirements, the SWLP is subject to four tests of soundness, set out in paragraph 36(b) of the 2024 version of the NPPF, to which the Plan is subject. The plan must be shown to be 1) positively prepared; 2) justified; 3) effective; and 4) consistent with national policy. *Positive preparation* requires that the plan ‘seeks to meet the area’s objectively assessed needs’. There seems to be a presumption among Councillors and planners that this refers primarily to housing and economic land supply, but there is no reason given in the NPPF that this should be interpreted so narrowly – there is, for example, certainly a ‘need’ to reduce air pollution, and while the need to reduce carbon emissions cannot be considered narrowly a need of the area, the area certainly shares in that need. In what follows, however, the focus is primarily on the other three tests of soundness. The test of *justification* refers to ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’. *Effective* here means ‘deliverable over the plan period’. Being in accordance with sustainable development is mentioned as a presumption in the description for tests 1 and 4.

The legal failings of the SA are in many cases also failings of these four tests of soundness. Together with the Vision statement on p. 26, Strategic Objective 5, and Policy DS.1, as well as many policies subservient to this, show that a central aim of the plan is to reduce or minimise carbon emissions and help ensure the Councils meet their Net Zero targets. These policies are also in accordance with national Net Zero targets (and thus meet the fourth test of soundness). Inadequacies in the SA, in associated documents, and in the choices made in the development of options within successive iterations of the plans, amount to a systematic failure to address the issue of climate change in a way that adequately identifies the carbon impacts of spatial choices open to the Councils. The choices made thus cannot be justified as a response to the climate emergency. There are often also strong reasons for believing the choices made are not the most sustainable choices, and that the plan will therefore fail tests of effectiveness. Indeed, there are reasons for believing even the unsustainable program of infrastructure provision will not be deliverable. Because of the strong focus of national policy on net zero and sustainable development, including the 2024 version of the NPPF by which the SWLP will be judged, there are also strong grounds for believing the plan is

inconsistent with national policy. The plan is therefore unsound on at least three of the four tests.

### **3. Significant effects of the Stratford Bypass (and other infrastructure) not identified, described and evaluated in the SA**

*Problems: Non-compliance w. SEA Regulation 12, failure of second test of soundness (justification).*

The Stratford Bypass is probably the largest infrastructure commitment in the plan. It will generate significant carbon emissions, both as an infrastructure project with significant embodied emissions incurred in its construction, and as a road which will induce more road travel. To accord with the SEA Regulations, these impacts should have been *identified* and *described* as follows:

- The Bypass will be a large-scale infrastructure project, involving the building of a road and bridge that will have to cross a flood plane, the river, the greenway (at a height sufficient to retain the possibility of railway reestablishment) and the Luddington Road. The Bypass also requires significant transport infrastructure to ‘accommodate’ it, as detailed in the Strategic Transport Assessment (STA), including several new roundabouts/roundabout upgrades and the dualling of a portion of the A46 between two of them.<sup>3</sup> This will generate extensive carbon emissions from the manufacture and pouring of concrete and other building materials, and from the energy costs of construction and transport.
- A large academic literature shows that increasing road capacity encourages more car use – a factor which often thwarts imagined congestion relief, and also leads to more carbon emissions from transport (which should also include emissions embodied in the construction of vehicles driven). An authoritative survey has recently been published by the Department of Transport, which also uncovers inadequacies in how existing transport modelling practices account for this effect.<sup>4</sup> One logical consequence of induced travel logics is that a new settlement serviced by a new road is not equivalent to a new settlement serviced by an existing road: the road built to service the former will induce new journeys across its network, while the journeys associated with the latter will tend to suppress journeys across the network to which it is added.

There is no identification, description or evaluation of impacts on carbon emissions associated with the bypass in the Sustainability Appraisal. The Sustainability Appraisal of Policy ID.4: Stratford-upon-Avon Bypass omits consideration of emissions from the

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<sup>3</sup> ‘Stratford-upon-Avon STA Testing Results Summary’, April 2026, pp. 23-25.

<sup>4</sup> Phil Goodwin, ‘Impact of Induced Demand on Benefits’, May 2026, [www.gov.uk/government/publications/how-additional-road-capacity-affects-travel-demand](http://www.gov.uk/government/publications/how-additional-road-capacity-affects-travel-demand)

delivery of this road on the grounds that ‘the policy safeguards an indicative corridor rather than delivering the bypass itself’ (SA, Appendix I, p. 28). This may reflect what the policy literally says, but it is very clear (even within the broader text of Policy ID.4 itself) that the Councils are committed to ensuring the road is actually built, not just to protecting a route for it. Key housing allocations (sites LMA, STR.2) accounting for around 7,000 homes cannot be delivered without it, and Stratford District Council is publicly talking about borrowing money to facilitate its delivery. Nor are emissions from the Bypass adequately described or evaluated in the Appraisal at other locations where they might conceivably be accounted for. They are not, for example, evaluated in the Appraisal of Policy ID.2, which indirectly commits the Council to the *delivery* of the Bypass and not merely the protection of a route.<sup>5</sup> Nor are they considered in the SA evaluation of proposals for sites at Long Marston (LMA) and south of Stratford (STR.2), which cannot be delivered without the Bypass.

The SA’s failure to evaluate climate impacts arising from the interaction of spatial and infrastructure decisions does not apply solely to the Bypass. Chapter 3 of the Plan covers the delivery of infrastructure. There are numerous statements about the importance of ensuring infrastructure delivery at the right time, and policies intended to make this happen (ID.1, ID.2). The SWLP is thus a plan for infrastructure as well as for housing. There are also various infrastructure projects identified in Policy ID.3 which – like Policy ID.4 – safeguards routes for these projects. Many are seen as ‘critical or essential’ for the SWLP’s deliverability, which developers will be required to deliver prior to commencement or at agreed milestones’ (Policy ID.1).<sup>6</sup> Many involve road-building. These projects will have significant climatic effects, viz. carbon emissions, which needed to be identified, described and evaluated.

The SA contains no credible attempt to assess emissions associated with their delivery. Interestingly, although Policy ID.3 also only safeguards the route for some of these projects, the SA nevertheless recognises that they might have an impact – in contradiction to the appraisal of Policy ID.4. However, this impact is dismissed as ‘negligible’: ‘Additionally, safeguarding infrastructure to support sustainable travel initiatives has the potential to support modal shift away from private car use and improve opportunities for sustainable travel, reducing congestion and vehicular emissions. Subsequently, the safeguarding and future delivery of strategic highway infrastructure and road widening schemes could increase traffic generation and encourage private vehicle use in some locations. Therefore, a negligible impact has been identified for climate change and pollution (SA Objectives 1 and 6).’ (SA, Appendix I, p. 27) This impact is scored 0 in Table ID.3. The argument is apparently that because sustainable travel infrastructure might help reduce emissions, and road-building might help increase them, the fact the Plan contains some of each means they can be allowed

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<sup>5</sup> It links to a list of infrastructure projects ‘to be delivered through the SWLP’, which includes the Bypass: ‘Infrastructure Delivery Plan, Appendix B, Infrastructure Delivery Schedule’, July 2026.

<sup>6</sup> Ibid.

to cancel each other out. This is clearly not an adequate identification, description and evaluation of the climate impacts of the plan's infrastructure commitments, on the basis of 'current knowledge and methods of assessment' as required by SEA Regulation 12.3.a.

The SA is only required to consider 'significant effects' at a level appropriate to the Plan (SEA Reg. 12.3.b-d). Rather than requiring carbon footprinting of every piece of transport infrastructure, it would probably be fair to evaluate emissions from infrastructure in broad terms, in connection with the settlements it serves, or in connection to clusters of settlements which might be assessed as spatial options (in the current plan, LMA, STR.2, the Bypass, and the schemes mentioned in the STA, clearly form one such cluster, as none can be delivered without the others). However, this has not been done (the spatial options will be considered in more detail in Section 6 below). Carbon footprinting of sites, and spatial options, to the extent that it has been developed at all, does not include estimates of infrastructure impacts. Therefore, the Sustainability Appraisal does not identify, describe or evaluate the impacts of the infrastructural commitments in the plan in general, and so does not come close to evaluating the significant effects of the implementation of the plan. It thus fails the test of legal compliance with SEA Regulation 12, and the infrastructure choices included in the plan also cannot be justified in terms of climate change, meaning the plan is unsound on the second test of justification.

#### **4. Failure of SA to identify, describe and evaluate significant effects of reasonable alternatives: alternative sites**

*Failings identified: legal non-compliance with SEA Regulations; failure of second and third tests of soundness (justification, effectiveness)*

SEA Regulation 12.2 requires that a Sustainability Appraisal identify, describe and evaluate reasonable alternatives to the choices made in the plan. It seems reasonable to infer that the legal intention behind this regulation is to enable evaluation of whether the most sustainable choices have in fact been made, or rather, to enable the Councils to make the most sustainable choices (as the SA is not supposed to be a post hoc evaluation, but an ongoing part of the planning process). SEA Regulation 12.2's requirement that the SA take into account the objectives of the plan must surely also mean that the SA should be capable of informing the Councils as to which of the decisions in their power are more or less sustainable. In short, the SA should not be a box-ticking exercise, but a positive part of the planning process. Failure to provide a SA that is legally compliant in this respect is thus also tantamount to producing a plan that is unsound as unjustified.

The SWLP includes possible alternative sites for new settlements, which are presented in the SA as the reasonable alternatives it is required to assess. However, in its assessment of the climate impacts of the list of new settlements considered, the SA says this: 'Based on the current available information provided by the Councils, the only method by which to separate the new settlements is through using the capacities, where the new settlement that proposes the greatest number of dwellings / areas of employment land could be identified as the worst performing option.' (SA, Appendix G, p. 4). Accordingly, in Table G.2.1, all proposed new settlements are given an equal ranking (red, very negative), on the grounds that they will all lead to a lot of construction and operational emissions. The Sustainability Appraisal of the Strategic Growth Locations is very similar (see SA, Appendix F, p. 4-5): the only ranking factor is housing numbers at each site. The SA at earlier stages in the SWLP's development (Issues and Options, SA, Appendices B-D; Preferred Options, SA, Appendices B-C) has similar limitations, with analysis of carbon emissions of the various sites being limited to embodied emissions from their construction, and emissions from operation.

Emissions from construction and operation of houses will – given the assumed standards and mixes of type – be fairly similar wherever they are built – minor differences from e.g. transport of materials over different distances notwithstanding.<sup>7</sup> Evaluating settlements in terms of their size is of little use when the Councils have a fixed quantity of houses they have to build across the district: a similar quantity of emissions from construction and operation is going to be incurred in any plan the Councils develop. What the Councils can influence is emissions from transport, and transport infrastructure, induced by their spatial development strategy. To inform the Plan, it is precisely these emissions the SA needs to identify, describe and evaluate. By omitting to do so, the SA omits significant effects of implementing the plan (SEA Reg. 12.2) and of reasonable alternatives. It is also unable to provide an evaluation that takes account of the climate objectives of the Plan (Strategic Objective 5) and 'the contents and level of detail' of the Plan (SEA Regulations 12.2, 12.3). The Councils are also thereby unable to provide justification for their settlement decisions in light of their own and national commitments to net zero and sustainable development, meaning the SWLP again fails the second soundness test of justification.

That these decisions have not been guided by a sound Sustainability Appraisal means that in this respect, the SWLP commitments to minimising carbon emissions (Vision statement, Strategic Objective 5) are likely to be undeliverable. Some of these sites are located in the north, near the major centres of employment growth at Birmingham and Coventry located near railway stations with regular trains into one or the other town. The LMA site, on the other hand, is located south of Stratford, with no such access, and

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<sup>7</sup> This judgement is, for example, supported by the carbon footprinting exercise developed by Bioregional, included in the technical evidence, which is discussed further below.

no rail connection.<sup>8</sup> The latter, moreover, requires by far the most extensive program of road-building to enable it (a bypass, potentially dual carriageway, raised above the flood plain, with a bridge crossing two major obstacles in close proximity to each other, and perhaps also the Luddington Road, with several roundabouts installed or upgraded, and full dualling of the A46 between two of them). Whilst there are also significant infrastructure requirements identified for other sites, this is in almost all cases unlikely to be so extensive.<sup>9</sup> In the overall SA ranking of the new settlement locations at Preferred Options stage (SA, p. 75), the LMA option ranked in 7<sup>th</sup> position overall, coming ahead of a likely alternative, BW Bearley-Wilmcote, partly on biodiversity grounds. It seems very likely that if the carbon emissions, biodiversity damage, landscape harm, flooding impacts, landscape impact (the bridge will be high, and very visible) and so on from the building of the Bypass and bridge were added to the scales, LMA would finish in last place. Because its SA has failed to take into account the full impacts of the LMA settlement and the infrastructure associated with it, the SWLP is therefore likely based around selection of one of the least sustainable locations and development patterns, meaning its stated climate ambitions are likely to be ineffective. It will thus be unsound on the third test of soundness, as well as the fourth, as set out below.<sup>10</sup>

## **5. Inadequacy of Bioregional's carbon footprinting reports**

In response, the Councils might argue that other reports by Bioregional, included in the technical evidence, make good some of the inadequacies of the Sustainability Appraisals.<sup>11</sup>

These reports do provide analysis of carbon emissions for the major new settlements included in the final SWLP, and include a method for estimating emissions from transport, based on estimated differences in the level of external travel each settlement will entail. However, they do not make good the shortcomings of the SA for the following reasons:

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<sup>8</sup> The LMA site does have 15 ha. of employment land though, if the council's assessments are to be believed, this is of rather low value. See Icení, 'New Settlements Employment Note', 2024, and 'New Settlements Employment Note Update', 2026, included in the technical evidence. According to the latter, 'Overall, Long Marston is not a particularly attractive location for further employment development beyond that which is already allocated.' (p. 4)

<sup>9</sup> See the 2024 'Strategic Transport and Education Assessment of New Settlement Options', included in the technical evidence.

<sup>10</sup> Appendix K of the SA contains a list of new settlements with reasons for rejection – this is a summary of the reasons given by the Council to Lepus, not a summary of an independent assessment by Lepus. The list derives from the 'Growth Strategy Topic Paper' (pp. 53-54), which is itself a condensation of 'Annexe C: Strategic Site Selection Rationale'. It is not clear why it is included in the SA, as it is not relevant to the purposes of the SA.)

<sup>11</sup> 'Cumulative Carbon Impact by Site: Scenario Golf Site-by-Site Analysis', Bioregional, May 2026, 'Net-zero Spatial Planning Support: Carbon Implications of Spatial Scenario Golf', Bioregional, May 2026.

- The SEA Regulations do allow for an SA to be supplemented by other documents, but, especially at Regulation 19 stage, the Sustainability Appraisal should be the primary, summative assessment of the Plan's sustainability. Evaluations that are not used in the final SA cannot supplement the SA at this stage.
- These studies do not evaluate reasonable alternatives: they only assess the sites included in the final spatial scenario ('Scenario Golf'). Indeed, this is the reason they could not be used in the Sustainability Appraisal, where chosen sites need to be evaluated alongside reasonable alternatives (SA, Appendix E, p. 4).
- These documents still fail to describe and evaluate very significant effects that will arise from implementing the plan, i.e. they still fail to consider embodied emissions from infrastructure construction (including the Stratford Bypass). Nor do they consider the impact of induced travel dynamics on emissions.
- Methods and assumptions used to estimate transport emissions lack sophistication, and produce results that are in some instances absurd:
  - Trip distances are not based on assessment of likely destinations at the settlements in question, but on nationally average commuting distances associated with settlements with a similar degree of integration into the road network.
  - Absurd outputs are generated, e.g., the number of road kilometres travelled that the HAT development is projected to generate by 2050 is almost 17.4 billion. If we assume all 4,000 houses are built in 2032 (which they won't be) and that each house has two cars, those cars would still have to be driven 120,674 kilometers (or 75,421 miles) a year – or over 200 miles a day – to achieve that total. As the average UK car is driven only 7,100 miles a year, this is clearly not a realistic figure.
  - Proximity to a railway station is not a factor included in the modelling.
  - The rate of decarbonisation of EV travel seems optimistic: 16.45 billion EV miles, for example, are considered to result in emissions of only 2,734 tonnes CO<sub>2</sub>e. Emissions embodied in the construction of EVs do not seem to be considered in this sum. This creates a misrepresentation, as a large part of the point of encouraging modal shift to active and public transport is to avoid these embodied emissions.
  - It does not seem to be recognised that public transport will be electrified (though this is already happening in Warwickshire). This has the absurd result that high reliance on public transport becomes a carbon liability rather than a carbon benefit.
  - The HAT settlement, which has a railway station and is near employment zones at Birmingham and Coventry, has over twice the emissions associated with the LMA settlement, which has no railway station and is further from employment zones. This is very counter-intuitive and needs explaining. LMA achieves a lower carbon footprint per dwelling than 6 other housing allocations. This is despite the report saying that LMA is in a worse-connected LSOA than HAT, with 500 more houses, and a similar

starting date and developmental schedule. On the methodology as explained, one would therefore expect it to have a carbon footprint close to that of HAT, or even higher, and a very high carbon footprint per dwelling. One suspects user error in entering figures into the model, but this is impossible to prove from the report. At any rate, given the absurdity of the travel estimates for Hatton, from which this divergence derives, it is clear no estimates taken from this model can be taken seriously.

- The assessments in these documents thus clearly fail to take account of current knowledge and methods of assessment, as required by SEA Regulation 12.3.a.

These faults mean that, while these reports might serve as a useful starting point for an exploration of carbon emissions to be expected from the plan, they are neither complete, detailed, nor accurate enough to justify decisions taken by the Councils in relation to their aim to limit carbon emissions. This contributes to and compounds the failures of justification and effectiveness mentioned above, meaning that again the Plan violates §36(b) of the NPPF.

The Bioregional reports are worth reflecting on because it is not at all clear what question they were supposed to answer. As they only provide a carbon footprint for sites that had already been selected, they provide no justification for that selection. All we might learn from it is that there will be a lot of emissions associated with the Plan, which was surely already obvious to begin with. This shows that the evaluation of carbon emissions has here been treated as an afterthought or box-ticking exercise. The fact that the outputs were crude and sometimes absurd, and delivered at a scope that could not be used in the SA confirms this: it suggests that the report was not used or carefully read by officers, and perhaps that no care was taken in the composition of the study brief. When something is done as a box-ticking exercise, it tends to be done badly. The failings of these reports mean they can do nothing to redress the failure of the SWLP – which it should by now be clear is systematic – to evaluate and justify its decisions from a climate perspective.

## **6. Failure of SA to identify, describe and evaluate significant effects of reasonable alternatives: spatial options**

Spatial options developed and consulted on at earlier stages in the SWLP process considered broad patterns of growth. These spatial options included options where development was distributed along Rail Corridors and Road Corridors. It might be assumed that an appropriate assessment of carbon implications at this stage would have addressed the objections raised above. However, because of the nature of the options and the carbon emissions evaluation done, this is not the case.

In the first place, transport infrastructure is again excluded from the options and therefore the carbon analysis done. There is no attempt to index these options to a list of indicative infrastructure commitments, or to provide a carbon evaluation of those commitments. This could reasonably have been done, and would have been an appropriate method for assessing the climatic effects of different spatial options at this stage.

Some carbon analysis was done at the level of the spatial options at the Issues and Options stage, by the consultancy ARUP.<sup>12</sup> Their report, included in the technical evidence, details a fairly sophisticated model, which could potentially have been used *in lieu* of the Bioregional study just discussed (and which probably would have generated more useful results if it had been). Indeed, the report – which is dated November 2022 – suggests that the intention was for the model to be used with data about specific locations to develop more accurate carbon testing for specific locations as well as spatial options. It is not clear, therefore, why this was not done. However, it should be noted that the model does not include emissions from enabling transport infrastructure, though this could perhaps be added to it.

Although the model may be capable of operating with specific trip destination and frequency estimates for particular sites, of the kind a transport consultancy could have developed, at Issues and Options stage, only a very high level evaluation was performed.<sup>13</sup> Rather than building up outcomes from characterisation of specific sites, it used general assumptions about spatial strategies and proxies for key values like trip generation, trip distance, etc, derived either from regional or national averages, and applied uniformly across all settlement locations. At this stage, the model was used primarily to rule out a Dispersed spatial strategy, in favour of strategies combining larger numbers of houses, which could support infrastructure in order to reduce vehicle trips – the various other spatial options scored similarly.

Reports for possible new settlements were generated, but these just reapply these generic assumptions from the model as a whole to the specific sites, defined only by number of houses and quantity of employment land. As these were conceived of as identical at this point, the different locations all perform identically, depending on the spatial scenario they are included in. As a result, the report here provides no very adequate evaluation of emissions deriving from spatial location or associated infrastructure. There is thus no way of justifying any claim that this set of spatial outcomes has been adequately handled. The exercise done in this appraisal should have been the start of a more detailed exploration of the consequences of spatial decisions

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<sup>12</sup> 'Estimation of Emissions for Proposed Growth Options and New Settlements', ARUP, 2022.

<sup>13</sup> An example of such an assessment of 'demand characteristics' associated with a new settlement is found in the Jacobs report, 'Long Marston Airfield Garden Village: Sustainable Transport Viability & Feasibility Assessment', included in the technical evidence, at pp. 38-40.

for carbon emissions. It is not adequate as a justification of the pathway that has led to actual outcomes.

There is, moreover, a justificatory gap between the description and testing of the overall spatial options and the specific list of sites included in each spatial options. It is not straightforwardly obvious from the maps given (e.g. at Issues and Options, pp. 63 ff.) why specific sites were allocated to spatial options based on particular principles, especially regarding the composite options. Though the distribution for e.g. the Railway Corridors spatial option makes fairly obvious sense, it is not clear why the specific sites allocated to the final preferred option Sustainable Travel and Economy, were chosen. The methodology used is not explained in either the Issues and Options consultation document, nor in the associated document 'Evolving the Spatial Growth Options: The Story so Far', which merely details the expertise and consultations that fed into these Options. Thus, even assuming the carbon emissions evaluation done by ARUP at Issues and Options stage had been adequate, there remains in this respect a justificatory gap to the distribution of sites included in the Issues and Options consultation, let alone the final distribution of sites at Regulation 19 stage.

It is worth noting that LMA is included in every spatial option, including the Railway Corridors spatial option. This was because it could potentially be served by rail, if the railway line through to Honeybourne were reopened (see Section 8 below). However, considering delivering the rail link or bypass was always going to be a challenging task in the current policy environment, it seems unwise to have failed to assess alternatives, and suggests a degree of prejudice in favour of development at Long Marston.

It is therefore clear that the evaluations of the Spatial Options did not assess LMA as a development dependent on a major road-building infrastructure project, or even necessarily as a road-dependent development. Whatever utility the spatial options had for the early development of the SWLP, they have not provided a valid way of framing the real spatial alternatives confronting the Councils in terms of carbon emissions. The road-based complex of development composed of LMA, STR.2, the Stratford Bypass, and road projects to the north of Stratford, is not identified as an option, with alternatives to be tested according to a reasonable method. The plan thus again fails to satisfy the requirements of the SEA regulations to properly evaluate the emissions from the actual, road-based development proposals characteristic of the Stratford District side of the Plan, and to test reasonable alternatives. It is systematically unsound in its declared aim to respond to the climate emergency by reducing carbon emissions, as decisions over real alternatives cannot be evaluated or justified in those terms. Those ambitions, which align with both the NPFF and national Net Zero policy, are thus unlikely to be achieved. The plan thus fails at least three of the four soundness tests, of justification, effectiveness and conformity to national policy.

## **7. Failure of SA to identify, describe and evaluate significant effects of reasonable alternatives: ratio of houses between new and existing settlements**

It is worth pointing out an additional spatial option that could have been included at this point. It might reasonably be supposed that there are certain advantages of new settlements, from a climate point of view, for several reasons:

- 1) They can be located near likely employment at Birmingham and Coventry, reducing travel for work.
- 2) They can take advantage of existing transport infrastructure, especially rail. Any upgrades should be comparatively light touch and easy to fund compared to development to the south.
- 3) New settlements can be designed for active travel, without having to squeeze active travel infrastructure around existing patterns of car usage.
- 4) New settlements can be designed for higher density (key to sustainable design), with less need to worry about conflicts with existing settlement styles/codes.

Indeed, it was for similar reasons that new settlements were being considered in the first place (as well as the fact that it has seemed obvious to many that existing settlements simply lack the road pattern to cope with the scale of intended development). The document even still contains a strategic judgement in favour of new settlements! 'New Settlements, which are larger and intended to provide the foundation for growth beyond 2050, are the focal point for the delivery of housing growth in the South Warwickshire Local Plan.' (SWLP, p. 79) As it stands, only 8,500 of the 57,610 homes planned are in new settlements, and only the smaller of those, at Hatton, has railway connection.

From this perspective, it is reasonable to ask why only 8,500 of the Councils' overall target of 57,610 homes are in new settlements. Given that new settlements were being entertained, it would seem a natural approach to develop the ARUP model to test multiple spatial scenarios featuring different ratios of development in new settlements in the north to development at existing settlements. As it is, the distribution of homes between new and existing settlements seems arbitrary. There are presumably reasons for it, but they have not been stated and justified in an appropriate fashion, because the options have not been set out as such. This is therefore another reasonable alternative that has not been considered in the SA, or by the Council, and as such, is another way in which the SA is non-compliant with the SEA Regulations, and the SWLP is unsound because unjustified.

## **8. Failure of SA to identify, describe and evaluate significant effects of reasonable alternatives: restoring the rail link to Honeybourne**

An increased level of house-building at Long Marston (LMA), to at least some level, would be facilitated by reinstatement of the rail link to Honeybourne. However, despite numerous studies on the railway link over a course of decades, the extent to which this link would increase development capacity is not examined in the current technical evidence. This is therefore, another alternative that has not been adequately considered by the Councils. Several reports are included in the technical evidence, examining possible sustainable travel options to enable building at Long Marston.<sup>14</sup> They considered options like Demand Responsive Transport and improvements to the Stratford greenway, as well as internalisation rates achievable by higher housing densities and good site design. According to the consultancy Vectos 'providing for new road infrastructure to provide for necessary growth (where alternatives are available) is neither necessary nor desirable. ... the Southwest Relief Road to Long Marston is likely to induce vehicle demand and provide only a short-term "fix" to a problem that cannot be addressed through facilitating unsustainable travel habits. A different solution is needed. ... a well-designed settlement combined with a package of alternative travel options can create the change needed to move away from theoretical reliance on the SWRR'.<sup>15</sup> The subsequent Jacobs report rejects some of the trip internalisation assumptions of the Vectos report, suggesting this conclusion might be undermined. However, neither report assessed the railway, which would presumably support some degree of external trip substitution away from road journeys. The degree of building this would enable remains unknown.

In 2024 Stratford District Council received the Strategic Outline Business Case Refresh for the railway reinstatement, which culminated with several recommendations, which is included in the technical documents. These recommendations were reported to SDC Cabinet in March 2025, as follows:

### **1.3 Next Steps**

1.3.1 - The 2024 SOBC Refresh has identified two options which may be worthy of further consideration at Outline Business Case stage - Option 4c: Cross-Stratford tram-train; and Option 5a: Stratford – Honeybourne Junctions heavy rail link – but under the auspices of a wider review of sub-regional connectivity requirements in the context of proposed new developments.

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<sup>14</sup> Vectos, 'Long Marston Airfield Garden Village: The Vision – Part 1', Jan 2023; Vectos, 'Long Marston Airfield Garden Village: The Vision – Part 2 Evidencing the Vision', Jan 2023; Jacobs, 'Long Marston Airfield Garden Village: Sustainable Transport Viability & Feasibility Assessment', May 2024.

<sup>15</sup> Vectos, 'Part 2 Evidencing the Vision', p. 54.

1.3.2 - Ultimately, it is recommended by the 2024 SOBC Refresh that a further Outline Business Case (OBC) be undertaken to explore the two options in greater depth. An OBC would develop the two options in more detail, arrive at a demonstrable preferred option and set out how this would be funded, procured, delivered and managed.

1.3.3 However, before an OBC is pursued further, the 2024 SOBC Refresh recommends that a Sub-regional Transport Strategy/SOBC be undertaken for the Leamington – Stratford – Moreton-in-Marsh – Pershore / Evesham – Worcester arc. This would reflect the major development proposals in the area, identify potential transport schemes that could enable them and provide a ‘home’ for several proposals which are currently stalled, e.g. the North Cotswold Line improvements, Stratford South-West Relief Road, Stratford – Honeybourne etc.<sup>16</sup>

As this indicates, there is an unexplored possibility that a good case can be made for reinstating the railway line. Indeed, there are considerable potential regional and even national benefits of doing so. Better railway connection would also be a great benefit to the local tourist industry, and properly integrate Stratford into a major international tourist route from London via Oxford to Stratford. It would open up a second railway corridor from Birmingham through to London, and to Oxford and the Southwest, adding rail network resilience. It would also induce transregional mode shift, and thus carbon emissions reductions at a trans-regional and national level, as well as locally. These potentials for inducing modal shift away from private car travel, and so for reducing carbon emissions should have been identified, described and evaluated in the SA, and the failure to do so involves non-compliance with SEA Regulation 12.2.

Stratford District Council has done nothing to advance these studies since March 2025. In omitting to do so, the Council has effectively prejudged a spatial alternative. Of course, if the Council refuses to pursue an option, that option becomes ‘impossible’, and the railway is now more difficult to make a positive part of the plan than it might have been. If the Council had expended the same money and energy on developing the case for railway reinstatement as it has done developing the Bypass project, the SWLP could look very different. The failure to identify and explore the option to give railway reinstatement a greater role in the SWLP at an earlier stage means that the pathway by which the Council has arrived at its current road-based model of development for Stratford District cannot be considered justified, so the SWLP again fails the second test of soundness.

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<https://democracy.stratford.gov.uk/documents/s72851/Honeybourne%20SOBC%20March%20Cabinet%20Report%202025%20final.pdf>

## **9. Effectiveness of the Plan**

Policy DS.3 sets out the Councils' development targets, as well as an illustrative schedule of how individual sites are expected to contribute to this in the years after plan adoption. The targeted figures here may not be deliverable due to uncertainties around funding for the Stratford Bypass (or Southwest Relief Road). There is thus a real possibility the plan cannot be effectively delivered, and that it is thus unsound on the third test of soundness mentioned in the NPPF, *effectiveness*.

Transport Authority evaluation is that 4,124 of the 4,500 houses at the LMA site cannot be delivered until the Bypass is opened. It is also very likely the 2,727 homes at STR.2 cannot be delivered without the bypass. It is well-known, and mentioned in Policy ID.4 and in the Atkins Realis study (p. 47), that Clopton Bridge is a key capacity constraint or pinch point in the town centre, and Councillors have often mentioned this as a factor in favour of the Bypass, which, it is argued, will reroute traffic away from Clopton Bridge. However, much of the traffic generated by the STR.2 development south of Stratford will naturally move north, across the Clopton Bridge (which is the more convenient route to the north of Stratford, even with the Bypass). If the STA shows that this is supportable (though in point of fact, it shows the Plan will worsen congestion on Clopton Bridge), this can only be because other traffic has been rerouted over the bypass. The Policy ID.4 justification mentions STR.2 as well as LMA as development which the Bypass will 'help ensure delivery of' (157).

Uncertainties around the delivery of the Bypass therefore mean there is a significant likelihood housing targets cannot be delivered, and that the plan is therefore unsound:

1. Funding has not been secured for the Bypass. DfT funding is not anticipated to be available in the near future, and cannot be counted on at any point. Stratford District Council is in conversation with Homes England about a contribution or loan, but this is very unlikely to cover the whole cost. Costs will put a very large burden on the funding that is available through developer contributions, given these will also be expected to help fund active and public transport infrastructure. With no clear funding path, there is a high likelihood that the Bypass will not be delivered, and that the majority of the houses at LMA and STR.2 will not be deliverable.
2. The road is expensive and costs are uncertain. The Councils seem to be understating the possible costs. The Planning Inspectorate has apparently been told the Bypass will cost £250 million.<sup>17</sup> This is very optimistic. Councillors are publicly talking of borrowing £150 million to fund the road. It is not clear which

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<sup>17</sup> 'Note of advisory meeting held on 19 May 2026 at Stratford-on-Avon Council Offices', p. 17, included as Addendum in Joint Cabinet papers for 28<sup>th</sup> May 2026, <https://democracy.stratford.gov.uk/ieListDocuments.aspx?CId=776&MId=7056&Ver=4>, accessed 26/8/2026.

costing this figure refers to. The Councils' own study provide 'base costs' of £90 - £180 million (p. 8), but in light of the tendency of infrastructure costs to spiral, provided more realistic figures with a risk uplift between £170 and £630 million, depending on the nature of the construction and the date of completion.<sup>18</sup>

Stratford Council has ruled out the cheapest version of the Bypass in order to protecting the route for reinstatement of a railway connection to Honeybourne (as per Policies ID.3 & ID.4), and accordingly, to ruling out the cheapest version of the Bypass, which would not include a bridge high enough to leave clearance for a modern, electrified railway connection. The likely costs of the next cheapest option are between £190 and £340 million. If transport assessments require that the Bypass be a dual carriageway, the more expensive version will cost between £360 and £630 million. These figures are also uncertain. They provide only an 80% confidence that this range will cover the costs, leaving a significant 20% chance higher costs will be incurred. The costs are very early estimates: no route has yet been identified, only an indicative corridor, and as such, no detailed surveys have been set out. Nor are the Councils' cost estimates broken down in any way, with assumptions stated, that would allow independent appraisal of their reasonableness. If initial 'base costs' are an underestimate, then 'uplifts' may be so too. It can be said, though, that the Bypass will be a very significant piece of infrastructure, being required to cross a long flood plain, with a bridge crossing the river and greenway at height (and also the Luddington Road). Thus, despite the uplifts, it is by no means impossible that actual costs could end up being higher, as the route is actively assessed, specific difficulties are identified, and mistakes are made.

3. There are additional expenses associated with the plan. The Strategic Transport Assessment of the project highlights the need for extensive additional infrastructure schemes to 'accommodate' the Bypass. These include major roundabout upgrades along the section of the A46 to the north of Stratford, and full dualling of the road between two of them. These additional schemes must be added to the cost of delivering the LMA and SR.2 complex of development to the south of Stratford. It is also acknowledged that impacts on local roads to the east and south of the LMA site have not been assessed. With as much as 25% of traffic heading in those directions, further upgrades may be necessary.<sup>19</sup>

Moreover, another expensive piece of infrastructure – a new bridge – has been committed to by the Council to facilitate growth at Bidford (BID.1). If the money for all this road and bridge-building cannot be found, the housing allocation at Long Marston, and very likely at STR.2, will not be deliverable (and deliverability of an additional 2,225 homes at Bidford will also be called into question). If the Bypass takes up a large proportion of developer contributions, that would also make it difficult to deliver active

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<sup>18</sup> AtkinsRéalis, 'Stratford-upon-Avon Longer Term Highway Capacity Study', pp. 8-9.

<sup>19</sup> 'Growth Strategy Topic Paper, Annexe C: Strategic Site Selection Rationale', p. 22.

travel infrastructure associated with the rest of the Plan, including at LMA, SR.2 and BID.1, and along the route of the Bypass.

Finally, the Stratford-on-Avon housing trajectory on p. 52 of the plan is unlikely to be delivered as advertised, for the reason that excessive numbers of housing are planned for prior to delivery of the Bypass. In the AtkinsRéalis study already mentioned it is acknowledged that the earliest the Bypass can be delivered is 2035, and that there is a real possibility it will not be delivered until 2040 – hence costings are given for those two dates. But by 2035, 500 houses and 600 houses are scheduled respectively at LMA and STR.2, and by 2040 1,750 and 1,495 are scheduled at the respective sites. Accounting for the 376 houses already permitted at LMA, it is therefore highly likely there will be a 724 shortfall by 2035 and very possible there will be a 2,869 shortfall by 2040. This raises further significant doubts over the plan's effectiveness and thus soundness.

It seems probable that this counter-intuitive development itinerary is intended to secure additional developer contributions from the STR.2 project for the Bypass. Thus the Growth Strategy Topic Paper says that 'The area [i.e. STR.2] will benefit from the Stratford South Western Relief Road (Stratford-upon-Avon Bypass) which will provide through access around Stratford-upon-Avon. The development also provides further opportunities for funding mechanisms to bring this forward along Long Marston and other schemes [sic]. Further enabling this infrastructure is a clear benefit of the bringing forward the site.'<sup>20</sup> It is possible this is the reason for inclusion of the STR.2 development, which has been a late inclusion in the plan. This again raises issues of deliverability, effectiveness and soundness.

It is also to be noted that the STA for the 'Golf Scenario' which includes STR.2 only includes 2,585 dwellings at this location, whilst as noted the final Plan includes 2,727 houses. The STA is thus based on a 142 house shortfall, leaving an additional element of uncertainty over full deliverability. This 142-dwelling shortfall may appear small, but it represents unmodelled additional traffic that will need to be accommodated on a network that the STA already shows as congested.

It may also be questioned whether the above represents value for money, which would be a further issue of justification. In the Atkins-Realis Option Assessment Report, three reasons are given for the LMA/bypass/SR.2 complex:

- The bypass will allow development to the south (i.e. LMA, SR.2, and other sites near LMA – collectively c. 700 houses).
- The bypass will remove cars from Stratford town centre, reducing congestion and enabling pedestrianisation. Without this, existing traffic would have nowhere to go, and would add to congestion on other routes.

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<sup>20</sup> Ibid., p. 102.

- Enhancing resilience. There are only two bridges over the Avon at Stratford. If one failed, for whatever reason, this would lock up the town. (Vehicle journeys at Clopton Bridge will not be reduced. Indeed, they would increase. Therefore, a closure of Clopton Bridge would still retain the capacity to lock up the system. There has, at any rate, been no modelling of this, so it cannot be taken entirely seriously. On the STA modelling, with the new approach 'Queuing occurs on Clopton Bridge, not previously reported with existing layout.' (STA p. 30) So it seems the new system makes matters worse, vis-à-vis Clopton Bridge, not better.)

The latter two reasons are obviated by the volume of traffic being added to the network by the development associated with the Bypass. The Stratford area STA modelling indicates that this development will add new queuing to the Clopton Bridge, even after the Bypass and all enabling schemes are built. This assessment does not even include assessment of town centre loss of capacity due to planned pedestrianisation and part-pedestrianisation schemes. The additional resilience from a new bridge would therefore also be undermined by the increase in traffic. It is also unproven that a bypass is necessary to facilitate town centre pedestrianisation, given that traffic is not a fixed quantum, as the old 'predict and provide' model of transport planning would have it. Instead, as Phil Goodwin's recent DfT report reviews, transport volumes are responsive to levels of infrastructure provided across modes.

It therefore seems that the principle reason for delivering the Bypass is to enable development at LMA, and to a lesser extent, at STR.2 – or, to put it bluntly, to enable the construction of a low-value housing estate in the middle of nowhere, with a patch of low value employment land which will enable only a fraction of the employment necessary at the site.

The Council has published a rationale for its Strategic Site Selections, as Annexe C to its Growth Strategy Topic Paper (GSTP). Here we consider only the decision to proceed with LMA as against alternative New Settlement sites, assuming this to be the main option.

The most reasonable alternatives to LMA (here called E1: Long Marston) seem to be A1/A3 Danzey, C1 Kingswood, and BW Bearley-Wilmcote. There are problems with all of them, mostly concerning judgements regarding transport accessibility provided by Warwickshire County Council. This document lists various issues at each site, which we do not pretend to be able to judge. However, quantitative judgements are available. The GSTP, for example, rates all these sites as Severely Constrained, except Bearley-Wilmcote, which on this assessment would be an easier, not a more difficult site to deliver, than LMA.

A separate Strategic Transport and Education Assessment of New Settlement Options, provided by Warwickshire County Council, is included in the technical evidence. This

document rates the severity of transport issues according to a traffic light system, with green good and red bad. It rates E1 Long Marston as Red, and by comparison it rates C1 Kingswood as Amber/Red, and BW as Amber. It does not rate the A1/A3 Danzey site, at it was not considered an option at the time of assessment (2024), but from the GSTP it can be inferred that WCC considered the transport issues here to be very challenging.<sup>21</sup> It thus seems that there is objective basis for saying that at least two of the possible alternatives to LMA – Bearley-Wilmcote again, and Kingswood – are less constrained/less challenging from a transport perspective. Both would require upgrades, but neither would require £190 – 630 million spending on a Bypass. There are therefore strong reasons to believe more effective, cheaper alternatives have been passed over in favour of a more expensive option, which is another failure of the test of justification.

## **10. General failures of the SWLP**

Together with the Vision statement on p. 26 and Strategic Objective 5, Policies DS.1, DS.2, ID.2 and ID.5 collectively set out a central aim of the plan: to make sure it responds to the climate emergency by minimising carbon emissions, by locating development in places that favour the use of sustainable transport and the prioritisation of sustainable transport infrastructure. These aims will not be achieved because the spatial choices made for Stratford District – presumably by Stratford District Council – are in complete contradiction to this, and as very little work has been done developing sustainable transport infrastructure projects. As the spatial development strategy is in contradiction to the principles on which it is claimed to have been based, these aims cannot effectively be delivered, and the Plan cannot possibly be justified. It is also in contradiction with similar principles found in the NPPF. It is therefore unsound on at least three of the four tests: effectiveness, justification, and consistency with National Policy.

The Plan's guiding 'Vision' (p. 26) references 'sustainable development', 'the climate emergency', and achieving 'net zero carbon' emissions, as well as 'accessible locations that promote active travel' and provide 'convenient access to services and facilities by cycling, walking, public transport and private vehicle'. Strategic Objective 5 is 'Ensuring that new development is resilient to climate change and does not cause a net increase in carbon emissions, taking positive action to achieve net zero.' (p. 27) In pursuance of this, the development strategy, Economy and Sustainable Travel (DS.2), is supposed to represent a composite of two principles: a) locating development near employment

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<sup>21</sup> A1/A3 is an extension of A1 South of Tamworth-in-Arden. Although A1 receives an Amber rating from WCC, it seems to have been discounted due to lack of developer interest. It was then expanded to make up the A1/A3 extended site. From what is said in the GSTP, it seems the larger site did attract developer interest, but WCC seems to have delivered a very negative transport assessment, which we might infer might have been red. We are not privy to Council's conversations with developers, so cannot comment further on this option, or on option A2 East of Wood End.

centres, so as to minimise commuter travel; and b) locating development in places that favour the use of sustainable travel (Issues and Options consultation document, pp. 63 ff.). Paragraph 2.55 claims that 'The Development Strategy has flowed from the earliest iterations of the SWLP and reflects its vision of achieving sustainable development whilst strengthening local communities and responding to the climate emergency. It does this by locating the majority of development in places that can be accessed by means other than the private car.' (p. 36) Policy ID.2 states that 'Priority will be given to early provision of high-quality public transport, walking and cycling infrastructure to enable sustainable travel patterns from the outset.' (p. 152).

Policy ID.5, Sustainable Transport Accessibility, concretises all of this with a strong commitment to prioritise sustainable transport:

- 'development proposals must prioritise walking, cycling and public transport, to encourage a modal shift away from the private car' (157)
- 'Proposals will be supported where they: 1. Demonstrate that they are in sustainable locations where travel distances can be minimised, and the use of sustainable travel modes maximised' (157). (Requirements for major developments are even more stringent.)
- 'In order to enable the modal shift away from the use of the private car, sustainable transport corridors will be delivered along key arterial transport routes within South Warwickshire. These will utilise improvements to bus, rail and active transport connections to ensure parity between these modes and the private car.' (158)

It is noteworthy that the schemes listed are all located in Warwick District, where they serve many of the new settlements/strategic locations planned there. There are no comparable schemes mentioned for Stratford District.

The principles declared in these policies are all in accordance with National Policy – and therefore should be retained. The National Decarbonising Transport Plan likewise makes 'accelerating modal shift to public and active transport' its number 1 strategic priority, expressing aims that we should 'develop a cohesive, widely available, net zero public transport network', so that we 'use our cars differently and less often', and 'public transport and active travel will be the natural first choice for our daily activities'.<sup>22</sup> In the 2024 edition of the NPPF, they accord with the Principle in Favour of Sustainable Development (NPPF 11), and with Chapter 14 in general, especially 164.b: 'New development should be planned for in ways that ... help to reduce greenhouse gas emissions, such as through its location, orientation and design' (NPPF, p. 48), as well as numerous passages of Chapter 9, 'Promoting Sustainable Transport', especially paragraph 110, which states: 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' (NPPF, p. 31) Though the SWLP is not yet subject to

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<sup>22</sup> Decarbonising Transport: A Better, Greener Britain, 2021, p.36.

the 2025 version of the NPPF goes further than this, introducing a presumption in favour of development near well-connected railway stations. The SWLP's reliance on a road-dependent strategy—centred on the Long Marston development and the Stratford Relief Road—is out of step with this emerging national policy.

However, as set out above, the output of the plan in the Stratford District is in stark contrast to this:

- The centrepiece of the spatial strategy and transport infrastructure plan in Stratford District is the building and enhancement of a road corridor from Long Marston, up past the west side of Stratford, and then along the top of Stratford, to facilitate the passage of traffic generated by the LMA site to pass the town from south to north, and vice versa. It would make more sense to locate development in the north, at lower cost, with less road construction involved, and likely less carbon emissions.
- Of the new settlement locations, only a few have railway connection. This is altogether lacking at major developments at Bidford, Long Marston, Southam, Wellesbourne. The STR.2 to the south of Stratford is on the other side of the river from the train station, and cut off by congestion on the Clopton Bridge, which is not a friendly environment for cyclists. Of the major sites, only those at Henley and the other sites in Stratford might plausibly be seen as having railway connection, and these sites are probably too far from their respective stations to be considered walkable.
- By contrast to the contributions of Warwick District, all the major infrastructure projects listed for Stratford District in Policy ID.3 are road building projects. All the active travel corridors listed in Policy ID.5 are located in Warwick District. This shows a clear orientation of Stratford District towards a road-building strategy, in contradiction to the aforementioned principles. The key ask of the Stratford Cycle Forum, for a pedestrian and cycling bridge over the Avon, is not included in the STR.2 site plan, though it would be a natural fit. Little additional work on cycling infrastructure in Stratford District seems to have been done, over and above that already done by Warwickshire County Council as part of its Local Cycling and Walking Infrastructure Plan.
- The road infrastructure projects in Stratford District will be very expensive, leaving little money from developer contributions or other pots for active travel projects.
- The opportunity to advance the case for railway reinstatement through to Honeybourne has not been taken up. Key studies were identified in early 2025 which Stratford Council could have led on and had prepared in time for SWLP submission. No work has been done in this direction since.

The SWLP thus delivers a model of road-dependent development, at least on its Stratford side, that is in total contradiction to its stated principles, as well as national policy. This contradiction is enabled by systematic failures of justification centring on

inadequacies in the Sustainability Appraisal and associated documents, particularly as regards the identification, description and evaluation of carbon emissions from transport and transport infrastructure construction. As a result the SWLP Vision statement, Strategic Objective 5, and Policies DS.1, DS.2, ID.2 and ID.5 cannot be effectively delivered. The SWLP is thus unsound on at least three of the four tests of soundness set out in the 2024 version of the NPPF.

## **11. Remedy sought**

To make the SWLP compliant with the SEA Regulations and to pass the four tests of soundness set out in the 2024 NPPF, we believe the Councils need to:

- Develop a legally compliant Sustainability Appraisal that properly identifies, describes and evaluates the impacts of the location of sites, and of complexes of transport infrastructure, on carbon emissions within the area, as well as other significant effects (such as impacts on biodiversity) arising from the latter. This could potentially be based on more fine-tuned use of the model developed by ARUP in 2022, if transport infrastructure emissions could be added to it. The assessment could investigate complexes of sites and the infrastructure required to enable them.
- Provide genuine consideration to reasonable alternatives, including greater allocations of housing to new settlements and the reopening of the Stratford-Honeybourne railway line, and commission the further studies pursuant to the latter at the earliest possible opportunity.
- Choose a spatial strategy and distribution of development which is justified by a Sustainability Appraisal meeting the above requirements, and which realises rather than contradicts the Councils' stated ambitions to minimise and reduce carbon emissions by locating development in such a way as to encourage modal shift to sustainable transport. We anticipate this will likely involve the removal of the major development sites south of Stratford, but our central point is that all such decisions must be justified by proper sustainability analysis.