



HENLEY'S FUTURE COUNTS

PUBLIC GUIDE

Responding to the SWLP Regulation 19 Consultation

KEY DEADLINE

Midnight on Tuesday 8 September 2026

The South Warwickshire Local Plan (SWLP) Reg 19, (the Plan) has now moved to its final public consultation stage before its submission to the National Planning Inspectorate for examination. The Plan contains a proposal for the development of a minimum of 2084 houses and an Innovation Hub on a site referred to as HEN.1 (previously referred to as SG23), also better known as the former golf course site.



IMPORTANT

This is the last chance for the public to comment on the Plan and to object to HEN.1 before it goes to a National Government appointed Inspector.

Understanding the Regulation 19 consultation

The Plan is a joint plan prepared by Warwick and Stratford District Councils working together.

At the earlier stages, the Councils asked what people thought of different policy and site options.

The Councils have commissioned a great many studies and appraisals from independent consultants. This body of 'Technical Evidence', together with the responses to previous consultations, has informed their choices and decisions which are reflected in this latest draft Local Plan. All the studies and appraisals comprising the 'Technical Evidence' can be viewed on the SWLP website.

In theory, at least, the responses to this current consultation could influence the Councils to make further changes before submission. However, the Councils have a deadline of 31 December to submit the Plan which doesn't leave much time make different choices and process significant changes. Nevertheless, this consultation is vitally important because the responses will be presented in some form to the Inspector along with the Plan. It is also conceivable that the Councils themselves will recommend changes to the Inspector as a result of responses to the consultation and further evidence gathered prior to submission.

What the Inspector will consider

The Inspector's role is to consider whether:

- the Plan is legally compliant
- the Plan is sound
- the Councils have complied with their duty to cooperate in preparing the Plan

Legally compliant

The Plan must comply with all relevant legislation and regulations in the way it has been prepared. Particularly important is the National Planning Policy Framework (NPPF).

When is a Local Plan considered 'sound'?

The National Planning Policy Framework (NPPF) considers a Local Plan to be sound if it is:

Positively Prepared • Meets objectively assessed development and infrastructure needs. • Makes sufficient provision for housing, employment, infrastructure and environmental protection.	Justified • Based on an appropriate and proportionate evidence base. • Represents the most appropriate strategy when compared with reasonable alternatives.
Effective • Deliverable over the Plan period. • Supported by infrastructure. • Capable of implementation.	Consistent with National Policy • Consistent with the NPPF and other national planning policy.

WHAT THIS MEANS FOR YOUR RESPONSE

This consultation is different from previous consultations. It is not enough to say, 'too many houses' or 'not enough trains' or 'leave our green belt alone'.

A representation must be made on the basis of the above criteria. For example, you might object that the Plan is not compliant with the NPPF because the Councils have made decisions and choices which are not supported by the evidence gathered or because there are critical assessments outstanding. You may object because you

consider that insufficient consideration has been given to alternative and possibly better choices compared to the sites selected.

There is another very important point when responding by way of an objection. An Inspector is likely to recommend changes to the Plan rather than reject it completely. Consequently, an objection accompanied by a suggested fix to the problem identified will carry more weight. For example, you might say that sites not in the Green Belt and closer to employment growth areas should be properly assessed as alternatives to HEN.1.

How to submit an objection

Responses can be made using the Councils' online portal or via paper on pre-prepared forms mailed to the Council.

However, HFC strongly advise using the Councils' online portal. It is quick, it guides you step by step, and arguably it will be more reliable in ensuring your representation reaches the Inspector

ONLINE PORTAL <https://southwarwickshire.oc2.uk/document/168>

1	Open the portal link and create an account (you'll need an email address)
2	Find the policy you want to comment on. For the Henley development, look in Chapter 8, Site Proposals, under HEN.1
3	For each policy/choice in the LP, the online portal asks whether it is legally compliant and sound. You are required to tick both boxes and assuming you wish to object, tick NO boxes for both 'legally compliant' and 'Sound'.
4	You are invited to make comments to explain your objection and to suggest a change to the PLAN that would address the reason for your objection. You can use the suggested representations below as your starting material, but it is important that you don't copy word for word. Adapt the suggested points to reflect your own style.
5	It is important you say what you want to say in your own style. The Inspector does not expect you to use the style and expressions of a Planner or Planning Consultant.
6	Your comments can be as long as 500 words, but only 100 words are allowed in the Comments box. You will be told how many words your response contains, and if over 100, you are given two options as regards a summary to appear in the Comments box. You can either manually summarise your detailed response or ask the online portal to use AI to summarise it for you.

	Our belief is that your full response will still be available to the Councils and Inspector.
7	The online portal will ask if you'd like to speak at the examination hearings. If you feel strongly, tick yes - you can withdraw later.
8	Once you have completed your representation you can immediately SUBMIT or ask for it to be retained in draft form and then, later you can re-enter the online portal, proceed to the policy in question and press RESUME.
9	Once you are happy with your representation press SUBMIT. You will receive a confirmation email which we recommend you keep.

What representations or objections should you make?

The Consultation document is structured into 8 chapters each covering different aspects of the Plan. The first 7 of these contain 88 Policies on which representations can be made. Chapter 8 contains the site proposals including HEN.1. Making a representation/objection to the HEN.1 site proposal is the most important and we set out below the key points in that regard.

Recognising what a daunting task it would be to make representations on a great many of the 88 policies, we set out below the key Policies we believe have the most relevance to HEN.1 and suggest the points that might be made in making representations/objections on those key Policies.

Start with HEN.1

WHAT IS PROPOSED

a development consisting of a minimum of 2084 houses and an Innovation Hub for research, development and office use on 125ha of Green Belt. According to the assumed build trajectory it will take around 15 years to build-out 4 phases commencing in 2029/30 with the final houses being built in 2044/45.

Key points that might be included in an objection to HEN.1

Preface: a fundamental issue is that Councils' own evidence works against their choice of HEN1. Each point below comes from studies the Councils themselves commissioned and published alongside the Plan. That is what makes them so powerful - an Inspector cannot easily dismiss evidence provided by the Councils' own experts.

PLEASE ADAPT THE WORDING

THE PRE-WRITTEN OBJECTIONS BELOW WILL ONLY COUNT AS ONE OBJECTION IF WE ALL WRITE THE SAME. PLEASE ALTER THE WORDING IN YOUR RESPONSE BUT USE THIS AS A FRAMEWORK.

Basis for choosing HEN.1

The reasoning behind choosing Henley is not rooted in evidence of local housing need. The north of Stratford corridor through Henley up to the M40 has not been earmarked in the Plan for major employment and economic growth, and so this cannot be the reason for choosing HEN.1. Instead, it appears to have been driven by the fact that a large portion of the earmarked land is in single ownership, and the landowner has been actively engaged in bringing the site forward over a number of years. These are not sound planning reasons for choosing the site. Accordingly, HEN.1 is not justified.

1

TRANSPORT

Suggested objection points from the HFC guidance

1.1 Traffic assessment and impact

While Strategic Assessments have been carried out to review the high-level impacts of the Plan on traffic across the South Warwickshire, Warwickshire County Council are in the process of developing a new core traffic model for the rural area of Stratford which covers Henley. The results of this model are not yet available and, therefore, have not informed the sustainability and viability of the site allocation, HEN.1. 2084+ new houses would generate many thousands of extra vehicular movements on our local roads every day. Given the existing pressures of traffic volume and congestion effecting Henley's High St and the approaches to Henley at peak times, this new local traffic modelling data is critical to the justification and soundness of the site allocation HEN.1. Even without this new model data, in producing the Concept Master Plan for HEN.1, consultants, AECOM, identified 4 key junctions that will require enhancing via a roundabout or traffic light system in order to ameliorate the impact of HEN.1. These do not include the crossroads at the southern end of Henley's High St which is recognised as a significant problem today but for which Warwickshire County Council are on record as not having an obvious solution. The primary and middle schools are located near these crossroads and school traffic adds to the congestion at key times. The extra traffic volumes in and around Henley when M40 and M42 traffic is diverted causes gridlock and long tailbacks at key junctions. Even small country roads become blocked as diverted HGVs try to negotiate the narrow lanes. The disruption to traffic flows and congestion caused by the construction work on the junctions referred to above will only exacerbate the problem. The modelling needs to test these combined scenarios and, until the results can be assessed, the viability and sustainability of HEN.1 must be in serious doubt. Accordingly, HEN.1 should be removed from the site allocations until such modelling is complete and a viable plan is developed to adequately deal with the different scenarios tested. In the event that a viable plan is not possible, and given the challenge presented by the additional traffic volumes that is far from certain, alternative site allocations should be considered that are not so compromised by the viability and sustainability of traffic movements. [378]

1.2 Road connection between A3400 north of Henley High St and the A4189

HEN.1 is not adequately justified or demonstrated to be effective because the proposed A3400–A4189 highway connection is treated inconsistently within the Plan and its evidence base. It is variously described as a link road, a western link road, a major link and a spine road, while HEN.1 expressly states that it is intended to enable traffic travelling to and from the Redditch direction to bypass Henley-in-Arden town centre.

The road therefore performs substantially more than an internal access function for HEN.1. It is simultaneously the principal development spine for a settlement of 2,084 dwellings, an access route for development traffic and a strategic through route intended to redistribute existing traffic from the surrounding highway network. The current volumes of traffic and size of HGVs pounding up and down Henley's High St daily call for a genuine relief road. The Plan should therefore demonstrate, through robust traffic modelling, that the road, its railway crossing and its junctions with the A3400 and A4189 are capable of performing all of these functions without unacceptable impacts upon Henley-in-Arden and the surrounding rural highway network. Such modelling is not yet available. Accordingly, HEN.1 should be removed from the site allocations until such modelling is available and a viable plan is developed including clarity over the exact nature and function of the connecting road between the A3400 and A4189. [224]

1.3 Rail transport

HEN.1 is not adequately justified or demonstrated to be effective because its sustainable transport strategy relies materially upon an uncommitted enhancement of rail services.

The Spatial Growth Strategy used accessibility to rail services as a key factor in directing strategic development, and the existence of Henley-in-Arden railway station was considered to contribute materially to the sustainability case for HEN.1. However, proximity to railway infrastructure is not equivalent to the availability of sufficient rail service capacity to support a development of at least 2,084 dwellings and the more than doubling the economically active population of Henley.

The SWLP Transport Mode Shift Methodology expressly assumes enhancement of the Birmingham–Stratford service from hourly to half-hourly. However, Warwickshire County Council's own transport evidence describes the additional service and associated Snow Hill Line improvements as a future aspiration rather than a committed and funded scheme.

Moreover, the Regulation 19 Infrastructure Delivery Plan records the West Midlands Rail Investment Strategy aspiration for 2040 as one stopping Birmingham–Stratford service per hour and one semi-fast service per hour, the latter operating limited-stop south of Whitlocks End. The Plan does not demonstrate that the second service will call at Henley-in-Arden.

The additional service also needs to be considered in the context of capacity constraints within the central Birmingham rail network. Network Rail identifies central Birmingham as a complex and congested part of the network and Midlands Rail Hub as necessary to unlock additional central Birmingham capacity. Although Midlands Rail Hub has made substantial progress and its West/Central element is now in detailed design, the programme remains subject to delivery risk and does not itself amount to a commitment to operate two trains per hour calling at Henley-in-Arden.

Network Rail's own West Midlands and Chilterns Route Study in 2017 which has informed their long-term planning has yet to be updated to take into account the SWLP. In that study they state that the Henley–Stratford is not considered to be a growth corridor and accordingly the line has low priority for rail investment.

No evidence has been identified demonstrating a committed train path, service specification, rolling-stock provision, operating subsidy/funding arrangement or delivery date for a second hourly service calling at Henley. Nor does HEN.1 appear to contain a build/ occupation trigger preventing substantial development before such a service is operational.

Accordingly, the Councils have not demonstrated that the rail service underlying the assumed sustainable mode share for HEN.1 is deliverable in step with development. Unless the transport assessment also models the reasonable scenario in which HEN.1 is occupied while the existing approximately hourly Henley service continues, there is a material risk that rail mode share has been overstated, and private-car use and consequent highway effects understated.

This is so fundamental to the justification of the site allocation in the first instance, that HEN.1 should be removed from SWLP Reg 19 until a satisfactory transport assessment has been carried out and there is far greater certainty over the delivery of the required additional services on the Stratford–Birmingham line. [498]

1.4 Water Supply, Sewerage and Wastewater Treatment

HEN.1 is not adequately justified or demonstrated to be effective because the Councils have not established through site-specific evidence that mains-water, foul-sewer and wastewater-treatment capacity can support at least 2,084 dwellings, employment development and associated facilities.

The Regulation 19 proposal states only that foul water will drain to new pumping stations before entering Severn Trent's existing network. It does not identify connection points, pumping capacity, the condition or capacity of receiving sewers, necessary reinforcement, treatment-work improvements, costs, funding or delivery timescales.

Severn Trent's Regulation 18 representation stated that HEN.1 would probably be served by Wootton Wawen Wastewater Treatment Works, which has low capacity constraints but high environmental constraints. Network upgrades and hydraulic modelling would be required. An alternative connection to Redditch–Spernal might be

possible, but significant network constraints arise from its distance from HEN.1. Severn Trent therefore classified HEN.1 as a “medium-risk” location and did not confirm that the existing infrastructure could accommodate it.

The Infrastructure Delivery Plan relies principally upon the 2024 JBA Stage 1 Water Cycle Study. However, the IDP expressly acknowledges that its conclusions use broad growth assumptions and are “not focused on site-specific delivery”. The study predates the final allocation of a minimum of 2,084 dwellings and does not provide a detailed hydraulic assessment of the sewer route from HEN.1 to Wootton Wawen.

There is no evidence of a cumulative assessment covering committed and proposed development at Wootton Wawen, Henley and other settlements within the catchment area. Nor has adequate consideration been demonstrated of sewer condition, infiltration, climate change or the environmental constraints affecting increased treatment-work discharges.

Similarly, no site-specific evidence confirms adequate mains-water flow and pressure, required network reinforcement, effects upon existing customers or the implications of the two strategic potable-water mains crossing HEN.1.

Policy ID.11 requires sufficient sewerage and treatment capacity to exist or be delivered before occupation without harming the existing network or water environment. Deferring fundamental questions of feasibility, environmental acceptability, cost and delivery until the planning-application stage does not demonstrate that this strategic allocation is sound.

Before HEN.1 is allocated, the Councils should obtain and publish:

- site-specific water-supply and foul-drainage assessments;
- hydraulic and condition modelling of the complete receiving sewer network;
- a cumulative catchment assessment;
- confirmation from Severn Trent and the Environment Agency of an acceptable treatment solution; and
- a funded and timed programme of necessary upgrades, with occupation prevented until they are operational.

Unless a deliverable solution is demonstrated, HEN.1 should be deleted, substantially reduced or made expressly contingent upon confirmed infrastructure capacity. [414]

2

VIABILITY

Suggested objection points from the HFC guidance

OVERVIEW

The viability of HEN.1 has been called into question by the Councils' own viability experts

2.1 HEN.1 has not been shown to be deliverable

The allocation of Site HEN.1 is not effective because the Joint Councils have not demonstrated that the allocation is financially viable or deliverable. The Councils' independent viability consultants, AspinallVerdi, give HEN.1 a 'Red' rating and conclude that the combination of the 40% affordable-housing requirement and the likely cost of infrastructure and Section 106 contributions result in a financially unviable position. The site generates a negative residual land value and is assessed as viable only with 0% affordable housing. The Plan nevertheless relies upon HEN.1 for a substantial component of its housing supply without identifying a secured and evidenced mechanism by which the viability deficit will be overcome. The allocation is therefore aspirational rather than demonstrably deliverable and cannot properly be relied upon in the housing trajectory. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [146]

2.2 The allocation conflicts with the Plan's affordable-housing objectives

HEN.1 is not justified because the affordable-housing benefit attributed to the allocation is contradicted by the Councils' own viability evidence. AspinallVerdi conclude that, under the current assumptions, HEN.1 only becomes viable if there is 0% affordable housing. Even with a highly optimistic 20% increase in market values, the assessment indicates that only approximately 35% affordable housing could be supported. It follows, therefore, that the Plan cannot soundly rely upon a nominal affordable-housing requirement that its own evidence shows is undeliverable. If the affordable housing requirement is subsequently reduced through a viability review, one of the principal, asserted public benefits of allocating and removing this land from the Green Belt will be materially diminished. The Councils have not reassessed the allocation or put forward reasonable alternatives on that basis. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [148]

2.3 The Councils rely on speculative and unsecured future funding

The allocation is not effective because its viability depends upon substantial external grant or public-sector funding that has neither been identified nor secured. The suggestion that grants may be available under national programmes is not a funding strategy. No commitment has been identified from Homes England, the local authorities, Warwickshire County Council or any other infrastructure provider sufficient to meet the probable HEN.1 deficit. The Plan contains no satisfactory contingency plan if grant funding is unavailable, delayed or materially less than required. An allocation whose delivery depends upon speculative public subsidy cannot be treated as demonstrably deliverable for the purposes of meeting the Plan's housing target and indicated trajectory. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [129]

2.4 Reliance on a 20% market-value uplift is not robust

The Councils have not demonstrated a robust route to viability by referring to possible future market-value or placemaking premiums. AspinallVerdi indicates that a 20% uplift in sales values would still support only approximately 35% affordable housing. Such an uplift is an optimistic sensitivity, not a forecast or basis for judging deliverability. The assumed premium also depends upon early delivery of the very schools, transport

upgrades, public realm and community infrastructure whose cost causes the present viability deficit. The Plan does not resolve this circular dependency and therefore does not demonstrate that HEN.1 will ever become viable when required by the housing trajectory. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [122]

2.5 Infrastructure cannot simply be reduced to make the figures work

The Plan is not effective because it presents reductions in infrastructure costs as a possible means of making HEN.1 viable without demonstrating that the required infrastructure can safely or sustainably be reduced. Infrastructure is not an optional policy burden; it is necessary to mitigate the adverse impacts of over 2,000 dwellings and an Innovation Hub on Henley-in-Arden and the wider area. The Councils have yet to demonstrate that every essential element of infrastructure to support HEN.1 has been identified, properly costed, funded and programmed in line with the housing trajectory. Until that work is complete, it is impossible to know whether the assumed £49,653 infrastructure and Section 106 cost-per-dwelling assumption in the Plan is adequate. Any presently unidentified costs would increase the viability deficit. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [144]

2.6 The appraisal may understate rather than overstate the deficit

The Councils' description of the appraisal as a general "worst-case" position does not overcome the specific findings for HEN.1. AspinallVerdi state that HEN.1 remains unviable even before potential increases in infrastructure costs, policy requirements or landowner expectations. Since the infrastructure schedule, cost plan, landowner expectations and other site-specific requirements are not finalised, there is a material risk that the present appraisal understates rather than overstates the viability deficit. The Councils have not supplied evidence capable of discounting their viability consultant's 'Red' assessment. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [102]

2.7 The Councils have not shown how the viability findings affected site selection

The allocation is not justified because the Councils have not demonstrated how AspinallVerdi's 'Red' rating of HEN.1 influenced the site-selection exercise. There is no transparent comparative analysis showing why a fundamentally unviable site remains the most appropriate strategy when assessed against reasonable alternatives. The Sustainability Appraisal and Growth Strategy should have reconsidered alternative distributions, a materially smaller allocation at Henley, amended site boundaries and alternative strategic sites in light of the viability findings for HEN.1. Continuing with the preferred allocation without such reconsideration indicates that the viability evidence has been rationalised after the strategic decision rather than used to inform it. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [121]

2.8 Deferring further viability work until after Regulation 19 after consultation is unsound

The Plan has been published for consultation prematurely. The Councils expressly acknowledge that further work is required before submission for examination to identify all infrastructure requirements, refine viability, engage with promoters, investigate external funding and reconsider the policy position. These are not minor matters: they determine whether HEN.1 can be delivered and what public benefits it would provide. A Regulation 19 Plan should not depend upon material evidence and policy revisions to be undertaken after the consultation. If that further work changes the affordable-housing requirement, infrastructure package, phasing, housing trajectory or public-funding assumptions, a further Regulation 19 consultation must be undertaken. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [121]

2.9 The proposed flexibility in the Plan risks sacrificing necessary public benefits

The proposed flexibility does not establish soundness. It demonstrates that the Councils anticipated policy-compliant delivery may not occur. A site cannot be regarded as deliverable merely because the authority is prepared later to reduce affordable housing, defer infrastructure, alter tenure or commit public funds. The Plan must identify minimum non-negotiable requirements and demonstrate that HEN.1 can deliver those requirements. Otherwise, the allocation provides no certainty that the infrastructure, affordable housing and mitigation used to justify it will actually be secured. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation.

[100]

2.10 The housing trajectory should not rely on HEN.1 without a risk adjustment

The Plan's housing trajectory is not effective insofar as it relies upon delivery from HEN.1 without an appropriate risk allowance. A Red-rated strategic site with a negative residual land value, unresolved funding, substantial infrastructure requirements and undisclosed landowner expectations cannot reasonably be accorded the same delivery confidence as a viable, serviced and controlled site. The Councils should either remove HEN.1 from the relied-upon supply, substantially reduce or defer its contribution, or identify sufficient alternative allocations to address non-delivery or delayed delivery. [81]

3**SUSTAINABILITY**

Suggested objection points from the HFC guidance

3.1 HEN.1 fails on most of the sustainability criteria measured by independent consultants

HEN.1 is not sound because the Councils have not properly taken into account the findings of the July 2026 Sustainability Appraisal (SA) prepared by Lepus Consulting. The pre-mitigation assessment identifies significant adverse effects for HEN.1 in relation to climate change, biodiversity and geodiversity, landscape, cultural heritage, natural resources and waste. It also identifies adverse effects in relation to pollution, health, accessibility and education. The only significant positive effects are housing and economy. Even after the mitigation incorporated into Policy HEN.1 is considered, Lepus concludes that significant adverse effects remain in relation to climate change and natural resources, together with residual adverse effects for biodiversity, landscape, cultural heritage, pollution and waste. The SA expressly identifies the permanent urbanisation of a large area of Green Belt within the rural setting of Henley-in-Arden and emphasises the scale and irreversible nature of the development. The Councils have not provided a transparent and compelling explanation of why these extensive and permanent adverse effects are outweighed, why HEN.1 is preferable to less damaging reasonable alternatives, or why a materially smaller and more proportionate allocation at Henley was rejected. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [202]

3.2 The positive post-mitigation scores are unreliable

The positive post-mitigation scores for housing, health, accessibility, education and economy rely upon delivery of affordable housing, public transport improvements, walking and cycling infrastructure, healthcare facilities, new schools, community facilities, green and blue infrastructure, employment land and an innovation hub. Those benefits are not all existing characteristics of the location; they are future measures whose delivery depends upon viability, funding, phasing and third-party participation. The SA findings have not been reconciled with the AspinallVerdi viability assessment, which indicates that HEN.1 cannot presently fund the full affordable-housing and infrastructure package assumed. If affordable housing, community infrastructure, transport measures or environmental mitigation is subsequently reduced or deferred to make the site viable, the positive sustainability effects relied upon to outweigh the identified environmental harm will not arise as assessed. The significant positive accessibility score is particularly uncertain. HEN.1 was assessed adversely before mitigation and only becomes significantly positive through assumed rail, bus, active-travel and local-service improvements. The Plan does not identify sufficiently firm commitments, funding arrangements, service frequencies, delivery triggers or fallback measures to demonstrate that those interventions will overcome the car-dependent nature of the location. Similarly, the significant positive economic score relies upon an assumed innovation hub and employment land whose market demand, commercial viability, occupier interest and delivery timetable have not been established. Temporary construction employment is not a unique benefit of HEN.1 and should not be given decisive weight. The Plan is therefore not justified because it has not demonstrated that HEN.1 represents the most appropriate strategy when assessed against reasonable alternatives. It is not effective because the mitigation and positive benefits required to justify the allocation have not been shown to be viable, funded, programmed and deliverable. HEN.1 should be removed from the site allocation and alternative, more suitable sites should be identified and appraised for allocation. [299]

REMEMBER

Use the suggested representations as a framework, but adapt the wording so your response reflects your own style.

4

ADDITIONAL REPRESENTATIONS

Suggested objection points from the HFC guidance

HEN.1 – Employment, Economic Growth and Sustainable Location

The allocation of at least 2,084 dwellings at HEN.1 is not adequately justified or demonstrated to be effective when considered against the SWLP's own evidence concerning the location of future employment and economic growth. The SWLP seeks to align housing with employment opportunities and reduce the need to travel. Its spatial strategy specifically identifies "Economic Co-location" – locating growth near employment so homes are close to potential workplaces – as an important consideration in determining the distribution of development.

However, the SWLP's economic evidence identifies a markedly different geography for strategic employment growth from the major housing growth proposed at Henley-in-Arden.

The Growth Strategy Topic Paper (July 2026) identifies the A46/M40 corridor as the focus for strategic industrial growth. The employment evidence identifies major economic clusters and investment opportunities around Warwick/Leamington, Coventry, Gaydon and the strategic road network.

This is reflected in major Regulation 19 employment allocations, including:

- 121 ha at Bishop's Tachbrook adjacent to the M40;
- 106 ha at Gaydon plus a further 51 ha for automotive-sector expansion;
- approximately 117 ha within South Warwickshire at Coventry Airport; and
- substantial employment provision at Gateway South and Whitley South.

These locations also benefit from significant existing or proposed strategic transport infrastructure investment.

Henley-in-Arden is not identified as a principal strategic employment-growth location or economic-growth corridor. Nevertheless, HEN.1 proposes at least 2,084 dwellings, creating a substantial additional economically active population. Employment proposed within HEN.1 is comparatively limited and there is no convincing evidence that sufficient jobs will be created locally for the workforce generated.

A substantial proportion of HEN.1 residents can therefore reasonably be expected to commute to employment centres elsewhere, including Warwick, Leamington, Birmingham, Stratford, Redditch, Coventry and the M40/A46 corridor.

This exposes a fundamental inconsistency in the spatial strategy. The Plan uses proximity between homes and employment as a sustainability criterion, and yet proposes one of its largest strategic housing allocations outside the principal areas identified for future employment growth.

This is particularly significant given Henley's transport constraints.

Modification sought

Before HEN.1 can be considered sound, the Councils should provide a robust homes-jobs and commuting assessment demonstrating the workforce generated by HEN.1, realistic local employment provision, likely destinations for residents working elsewhere, resulting commuting patterns, and how those journeys can be accommodated by committed and deliverable sustainable transport infrastructure.

HEN.1 is not justified or effective because the SWLP's own evidence shows that future employment growth will be concentrated mainly along the A46/M40 corridor and around Warwick, Leamington, Coventry and Gaydon, not Henley-in-Arden. HEN.1 proposes 2,084+ homes but comparatively limited local employment. Many new residents would therefore need to commute elsewhere for work, increasing pressure on already constrained roads and an inadequate rail service. This conflicts with the SWLP's own principle of locating

new homes close to employment opportunities. The Councils should demonstrate where HEN.1 residents will work and how their journeys can be sustainably accommodated before allocating development on this scale. [480]

DS.2 – Spatial Development Strategy

Unsound – not justified or effective.

HEN.1 is not demonstrated to be a sustainable Strategic Growth Location. At least 2,084 homes depend upon major infrastructure, including a new link road and railway bridge, junction improvements, enhanced rail and bus services, schools, healthcare, drainage, sewage and wastewater treatment capacity. Important elements remain uncommitted, unfunded or subject to further assessment. The evidence therefore does not demonstrate that HEN.1 is preferable to reasonable alternatives or can sustainably accommodate development of this scale. HEN.1 should be removed, reduced or reconsidered unless its essential infrastructure and sustainable transport requirements can be demonstrated to be deliverable. [94]

DS.3 – Meeting Development Needs to 2050

Unsound – not justified or effective.

The housing strategy relies upon HEN.1 delivering at least 2,084 homes between approximately 2029/30 and 2044/45. However, delivery depends upon an extensive and costly infrastructure package including highways, a railway bridge, public transport, education, healthcare, drainage, sewage and wastewater treatment, most elements of which remain subject to further assessment, funding and third-party agreement. There is therefore insufficient certainty that HEN.1 can deliver the assumed housing within the Plan period. Its contribution to the housing trajectory should be reduced or removed until infrastructure, viability and delivery are demonstrated, with an appropriate contingency for delay or reduced delivery. [96]

DS.4 – Strategic Site Principles

Unsound – not justified or effective.

DS.4 requires strategic sites to respect local character and provide necessary infrastructure alongside development, with clear delivery triggers and demonstrated viability. HEN.1 has not demonstrated these requirements. Necessary infrastructure includes upgrades to highways and public transport, a new railway bridge, education, healthcare, drainage, sewage and waste-water treatment all of which remain uncertain. Furthermore, treating 2,084 homes as a minimum, risks further development without reassessing infrastructure, viability, landscape and heritage impacts on historic Henley. Before proceeding HEN.1 requires a comprehensive masterplan, an independently verified viability assessment and a binding infrastructure delivery programme. Development above 2,084 homes should require further reassessment. [99]

DS.13 – Green Belt

Unsound – not justified or consistent with national policy.

Removal of HEN.1 from the Green Belt is not adequately justified. The claimed exceptional circumstances depend upon HEN.1 being a sustainable and deliverable Strategic Growth Location, yet major uncertainties remain over many elements of necessary infrastructure, sustainability and viability. Green Belt also protects countryside from encroachment and the setting and special character of historic towns, particularly relevant to Henley. The Plan has not demonstrated that reasonable alternatives have been properly considered and that releasing this Green Belt Land is necessary. HEN.1 should be deleted from the Green Belt alterations and alternative sites properly assessed which offer more certainty of deliverability. [100]

ID.1 – Securing Infrastructure Provision

Unsound – not justified or effective.

HEN.1 requires extensive infrastructure, including a new link road and railway bridge, junction improvements, public transport, schools, healthcare, drainage, sewage and waste-water treatment capacity. It has not been demonstrated that all these requirements can be funded and delivered while maintaining viability and the required affordable housing provision. Essential infrastructure needed to mitigate HEN.1's impacts should not subsequently be reduced because the development proves unviable. The Plan should identify each critical infrastructure requirement, its estimated cost, funding source, responsible delivery body and delivery trigger, and demonstrate through a comprehensive and rigorous viability assessment that the entire infrastructure package is deliverable. [99]

ID.2 – Infrastructure Delivery

Unsound – not effective.

HEN.1's essential infrastructure is not tied to sufficiently clear and enforceable delivery triggers. The link road and railway bridge, junction improvements, public transport enhancements, schools, healthcare, drainage infrastructure, and sewage and wastewater capacity must be provided ahead of or in step with development rather than after substantial housing occupation. The Plan should contain a binding HEN.1 Infrastructure Phasing Schedule specifying the maximum number of homes that may be occupied before each critical infrastructure item is operational, together with funding and delivery responsibilities. If essential infrastructure cannot be demonstrated as deliverable at the required stages, HEN.1 should be reduced or removed. [100]