

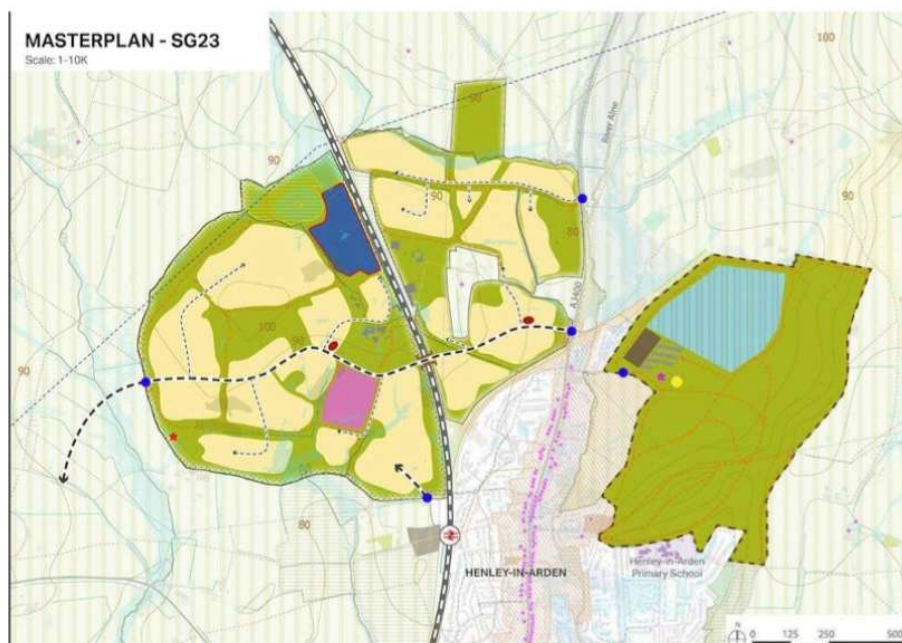


Responding to the SWLP Regulation 19 Consultation

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/>

1

Open the portal link and create an account (you'll need an email address). Once logged in click on [Publication \(Regulation 19\)](#)

2

Click on '[Table of Contents](#)' (the one under the header Publication Regulation 19). This brings up 9 different pages. Comments can be made on all this information but the most important part is to click on '[page 8, site proposals](#)' and scroll down to [8.8 HEN.1](#). Many are only commenting on 8.8 HEN 1

3

Click on '[Comment](#)'. It asks if you wish to support, object or comment. Assuming you wish to object, click on object. This still allows you to comment.

4

It then asks if whether it is legally compliant and sound. Assuming you wish to object click 'No' to both.

5	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 . 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 to summarise your words. You can either manually summarise your detailed response or ask the online portal to use AI to summarise it for you. If using AI please check it carefully. 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.

1.1. Traffic assessment and impact

HEN.1 is not justified or sound because essential local traffic modelling is incomplete. Warwickshire County Council's new model for rural Stratford, including Henley, has not informed the allocation. Some 2,084 homes would generate thousands of daily vehicle movements, worsening existing congestion, school traffic and gridlock caused by M40/M42 diversions. AECOM already identifies four junctions requiring major improvements, excluding Henley's problematic southern crossroads. The model must assess development, construction and diversion scenarios together.

HEN.1 should therefore be removed until comprehensive modelling demonstrates that effective, viable and deliverable transport solutions exist; otherwise, less constrained alternative sites should be allocated. [97]

1.2 A3400–A4189 road connection

HEN.1 is not adequately justified because the proposed A3400–A4189 road is inconsistently described as a link, western link, major link and spine road. It would serve simultaneously as the development's principal access, an internal spine and a strategic route enabling traffic to bypass Henley town centre. Robust modelling is required to demonstrate that the road, railway crossing and junctions can safely accommodate development traffic, existing through-traffic and HGVs without unacceptable effects on Henley or surrounding rural roads.

HEN.1 should be removed until this modelling is completed and the road's precise status, function, design, deliverability and effectiveness are clearly established. [99]

1.3 Rail transport

HEN.1 is not justified or effective because its sustainable transport strategy assumes an uncommitted increase in rail services. The evidence assumes two Birmingham–Stratford trains per hour, but no committed funding, train path, rolling stock, operating agreement or delivery date demonstrates that a second service will call at Henley. Central Birmingham capacity improvements also remain uncertain. Without modelling continued operation of the existing hourly service, rail use may be overstated and car use and highway impacts understated.

HEN.1 should therefore be removed until robust transport modelling is completed and delivery of the necessary rail service is reasonably certain. [98]

1.4 Water supply, sewage and waste-water treatment

HEN.1 is not justified or effective because there is no site-specific evidence that mains water, sewers and wastewater treatment can support at least 2,084 homes and associated development. Severn Trent identifies environmental constraints at Wootton Wawen Treatment Works and says network upgrades and hydraulic modelling are required. Redditch–Spernal is a possible alternative but has significant network constraints. The evidence does not assess sewer condition or the cumulative impact of other developments in the catchment.

HEN.1 should be deleted, reduced or made conditional upon confirmed capacity and a funded programme of infrastructure improvements completed before occupation. [96]

Viability

2.1 HEN.1 has not been shown to be deliverable

HEN.1 is not effective because its financial viability and deliverability have not been demonstrated. The Councils' consultants, AspinallVerdi, rate it "Red", finding that infrastructure, Section 106 obligations and 50% (40% if designated Grey Belt) affordable housing produce a negative residual land value. The site is viable only with no affordable housing, yet no secured mechanism for overcoming this deficit is identified. HEN.1 is therefore aspirational and cannot reliably contribute to the housing trajectory.

HEN.1 should be removed and replaced by more suitable, demonstrably deliverable alternatives. [85]

2.2 Conflict with affordable-housing objectives

HEN.1 is not justified because the Councils' evidence contradicts its claimed affordable-housing benefits. AspinallVerdi find it viable only with no affordable housing; even an optimistic 20% increase in market values would support only approximately 35%. The Plan cannot rely upon an affordable-housing requirement its own evidence shows is unviable. Reducing that requirement would substantially weaken a principal public benefit used to justify removing the site from the Green Belt.

HEN.1 should therefore be removed and more suitable alternatives identified and appraised. [91]

2.3 Reliance on speculative future funding

HEN.1 is not effective because its viability depends upon substantial external funding that has neither been identified nor secured. No adequate commitment exists from Homes England, the Councils, Warwickshire County Council or infrastructure providers, and referring generally to possible national grants is not a funding strategy. The Plan provides no satisfactory contingency if funding is unavailable, delayed or insufficient. A site dependent upon speculative public subsidy cannot be treated as demonstrably deliverable or reliably included in the housing trajectory.

HEN.1 should be removed and suitable alternatives appraised. [85]

2.4 Reliance on a 20% market-value uplift

HEN.1's viability cannot be justified by assuming future market-value or placemaking premiums. AspinallVerdi find that even a 20% increase in sales values would support only approximately 35% affordable housing. This uplift is an optimistic sensitivity, not a reliable forecast. It also depends upon early provision of the schools, transport improvements, public realm and community facilities whose costs help create the present viability deficit. This circular dependency remains unresolved.

HEN.1 should therefore be removed until deliverability is demonstrated, with more suitable alternative sites identified and appraised. [88]

2.5 Infrastructure cannot simply be reduced

HEN.1 is not effective because infrastructure costs cannot simply be reduced to achieve viability. Essential transport, education, drainage and community infrastructure is required to mitigate the effects of over 2,000 homes and an Innovation Hub. The Councils have not demonstrated that all necessary infrastructure has been identified, properly costed, funded and programmed alongside development. It is therefore impossible to know whether the assumed £49,653 infrastructure and Section 106 cost per dwelling is sufficient. Further costs would worsen the viability deficit.

HEN.1 should be removed and more suitable alternatives identified and appraised. [95]

2.6 The appraisal may understate the deficit

Describing the viability appraisal as a general "worst-case" assessment does not overcome its findings for HEN.1. Aspinall Verdi find the site unviable even before possible increases in infrastructure costs, policy obligations or landowner expectations. As the infrastructure schedule, cost plan and other site-specific requirements remain unresolved, the assessment may understate rather than overstate the deficit. The Councils have provided no evidence sufficient to discount the "Red" rating.

HEN.1 should therefore be removed and more suitable, viable alternatives identified and appraised. [82]

2.7 Viability findings and site selection

HEN.1 is not justified because the Councils have not explained how AspinallVerdi's "Red" viability rating influenced site selection. No transparent comparison demonstrates why this fundamentally unviable site remains preferable to reasonable alternatives. The Sustainability Appraisal and Growth Strategy should have reconsidered alternative development distributions, a smaller Henley allocation, revised boundaries

and other strategic sites. Proceeding without this reassessment suggests that the viability evidence was rationalised after the strategic decision rather than informing it.

HEN.1 should be removed and more suitable, viable alternatives identified and appraised. [92]

2.8 Deferring viability work until after consultation

The Plan has been published prematurely because essential work on HEN.1 remains outstanding. The Councils acknowledge the need to identify infrastructure requirements, refine viability, engage promoters, investigate external funding and reconsider policy before examination. These matters determine whether HEN.1 is deliverable and what public benefits it can provide; they are not minor details. A Regulation 19 Plan should not depend upon material evidence and policy changes prepared after consultation. If further work alters affordable housing, infrastructure, phasing, funding or the housing trajectory, another Regulation 19 consultation will be necessary.

HEN.1 should therefore be removed and suitable alternatives appraised. [99]

2.9 Flexibility risks sacrificing public benefits

The proposed policy flexibility does not demonstrate soundness; it confirms uncertainty over policy-compliant delivery. HEN.1 cannot be considered deliverable merely because affordable housing might later be reduced, infrastructure deferred, tenure changed or public funding provided. The Plan must specify minimum non-negotiable requirements and demonstrate that the site can viably deliver them. Otherwise, there is no certainty that the affordable housing, infrastructure and mitigation relied upon to justify HEN.1 will be secured.

The HEN.1 allocation should therefore be removed and more suitable, deliverable alternatives identified and appraised. [88]

2.10 Housing trajectory requires risk adjustment

The housing trajectory is not effective because it relies upon HEN.1 without an appropriate allowance for non-delivery or delay. A “Red”-rated strategic site with a negative residual land value, unresolved funding, substantial infrastructure requirements and uncertain landowner expectations cannot be treated as having the same delivery prospects as a viable, serviced and controlled site.

The Councils should remove HEN.1 from the relied-upon housing supply, substantially reduce or defer its contribution, or allocate sufficient suitable alternatives to address the significant risk of delayed or failed delivery. [82]

Sustainability

3.1 HEN.1 fails most sustainability criteria

HEN.1 is not sound because the Councils have not properly addressed Lepus Consulting's July 2026 Sustainability Appraisal. Even after mitigation, significant adverse effects remain for climate change and natural resources, with further harm to biodiversity, landscape, heritage, pollution and waste. The development would permanently urbanise a substantial area of Green Belt within Henley's rural setting. Its only significant pre-mitigation benefits relate to housing and the economy. The Councils have not demonstrated why the extensive, irreversible harm is outweighed or why less damaging alternatives, including a smaller Henley allocation, were rejected.

HEN.1 should therefore be removed and alternatives appraised. [98]

3.2 Positive post-mitigation sustainability scores are unreliable

HEN.1's positive sustainability scores depend upon future affordable housing, schools, healthcare, public transport, active travel, environmental infrastructure, employment land and an innovation hub. Their funding, viability, phasing and delivery are not secured. AspinallVerdi's assessment indicates that the complete infrastructure and affordable-housing package is presently unaffordable. Reducing or delaying these measures would undermine the benefits relied upon to outweigh environmental harm. Accessibility improvements lack firm commitments, service levels, funding and fallback measures, while demand, occupiers and delivery arrangements for the innovation hub remain unproven.

HEN.1 is therefore neither justified nor effective and should be removed, with more suitable alternatives appraised. [99]

Alternative Representations.

HEN.1 – Employment, Economic Growth and Sustainable Location

HEN.1 is not justified or effective because the SWLP's own evidence shows that future employment growth will be concentrated along the A46/M40 corridor and around Warwick, Leamington, Coventry and Gaydon, not Henley-in-Arden. HEN.1 proposes 2,084+ homes but limited local employment. Many new residents would 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. [99]

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 it's 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]