**South Warwickshire Local Plan (SWLP or Plan) – Preferred Options, Reg 18 Consultation**

Following are the comments and observations of Tysoe Parish Council (TPC) on the SWLP.

As with any local development plan, the prime assumption is that of population growth and housing need. In this case the assumptions in the Plan will last until 2050. The assumption of housing need is the fundamental policy that drives almost all other aspects of the Plan.

The Plan proposes a large number of Strategic Growth Locations (SGLs) and Potential New Settlements (NSs). These have either been brought forward from the existing Core Strategy or from a call for sites. None are close enough to Tysoe to unduly affect the parish. We anticipate that many will fall by the wayside during the viability review process as some are totally unsuitable (e.g. SG17 which is on the Stour flood-plain and spends much of the spring and winter under water). Some of the SGLs and NSs are within the Green Belt and consideration will be given to whether there are “exceptional circumstances” which would justify the release of Green Belt land for development. The consideration of so many unsuitable SGLs and NSs risks a cumulative adverse impact on the rural nature of South Warwickshire, something that we consider to be deplorable.

For Tysoe, the protection currently available in the Core Strategy through the specific policies pertaining to the Cotswold AONB, will exist in the SWLP. Also, developments will have to demonstrate “protection of the best and most versatile agricultural land”.

TPC is of the view, therefore, that the SWLP would not affect, in any detrimental way, Tysoe’s current protections. The Neighbourhood Plan would need to be revised to recognise and incorporate the policies of the SWLP but the protections should not be diluted.

However, having said all of that, TPC has a very serious disagreement with the SWLP. The fundamental assumption of housing need has been handed down as a diktat from national Government. It is clear that there has been significant political “manipulation” of this assumption. This can be seen when the results of using the Old Standard Method (OSM) in the Core Strategy are compared with the results of using the New Standard Method (NSM) in the SWLP. In the Core Strategy, using the OSM, Stratford District’s annual housing need was projected to be 553 pa, in the SWLP, using the NSM, this rises to 1126, **an increase of 104%** - totally non-credible. Using the same comparators the housing requirements for Coventry and for Birmingham have **reduced** by about 50% each. SDC maintain that the NSM used for the SWLP now takes account of the need to take overflow from Coventry and Birmingham (even though their needs are apparently reducing significantly). Pushing more housing growth into rural locations can only mean a growth in car travel as the employment opportunities for the occupiers of those homes will have to travel to their employment. This runs counter to the “green” aspirations of the Plan.

The housing needs numbers also include what is euphemistically described as the “affordability uplift”. This is the concept, totally debunked, that if you add more houses in expensive areas, prices will tumble.

The idea that the housing need might increase by 104% between the Core Strategy and the SWLP is absurd. There is no supporting evidence that this assumption is valid. It flies in the face of the fact that indigenous population growth is static or falling and gross population growth is only fuelled by inward migration – something that should not affect rural areas (such as Stratford district) as much as urban areas.

Although, as stated, the SWLP has little or no detrimental impact on Tysoe, the fundamental assumption on housing need being incorporated in the SWLP will lead to consideration of many unsuitable development sites across the region and also consideration of unsuitable policies. As such, although TPC support many of the policies contained in the SWLP, the overall premise of the Plan is totally flawed, based as it is on unsupportable housing requirement calculations.

The adoption of the NSM compromises the integrity of Strategic Objectives 1, 2, 3, and 4. Strategic Objectives 5 to 12, which rely somewhat less on the underlying population growth assumptions, are broadly acceptable.

One other consideration that concerns TPC; it is not clear what would happen to the SWLP if (or when) the proposed Unitary Authority for Warwickshire was enacted. This would eliminate the “District” level of local Government and would replace it with a single layer (above the Parish and Town Council layer).

TPC’s considered view is that the Plan, as it is currently presented for consultation, cannot be supported because of the housing numbers on which it is based. We say this realising that the assumption was passed down from national government, however, we have seen no evidence which indicates whether the assumption was supported by the authors of the Plan or not.

The accompanying spreadsheet indicates our agreement or otherwise for each Policy or Policy Direction.