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From: Ian Campbell [Redacted]
Sent: 06 February 2019 10:17
To: Planning Policy South
Subject: SOUTH OXFORDSHIRE LOCAL PLAN 2011-2034. (January 2019): Final Publication Version 2nd

TO PLANNING POLICY (Team)
FROM IAN CAMPBELL (see below)

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PART A

I am responding as an individual, in a professional capacity

Personal Details

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PART B

Do you consider the Local Plan and supporting documents

- \* are legally complaint. No
- \* are sound. No
- \* comply with the Duty to Cooperate. No

My reasons are set out below. Please note my analysis of the SODC Local Plan Preferred Options Stage 3 that was sent to you on 17 August 2016. This new draft Local Plan does not respond to those criticisms, nor have I found on the council website replies from the council to my responses in August 2016. For the sake of brevity those concerns are not repeated here, but remain to be addressed.

You seek modifications or suggested wording to make the new plan compliant. The modifications I recommend are below.

Participation in the Inspector's examination? I have no wish to participate unless asked. If I can assist the Inspector in any way, subject to my availability I will seek to do so.

MY PERSONAL DETAILS & EXPERIENCE

For forty years based in Reading I was a property consultant and senior partner of Campbell Gordon, chartered surveyors. Over the last five years I have examined one or more times the Local Plans of all but one of the six unitary authorities in Berkshire and three more, one in Hampshire, one in Surrey and on in

Oxfordshire(SODC's) to determine if they are sound. I have also responded to requests for evidence from the NIC (Cambridge/Milton Keynes/Oxford Corridor); Raynsford Review; and others. My area of special interest is long term strategic regional and sub-regional planning policies in the south of England, their impact on housing; local concerns and local governance.

## SUMMARY

1. The August 2016 Comments asked 'Will the Local Plan succeed?' The answer given at that time remains correct. It is no, for three reasons.

- \* the plan period is too short;
- \* the plan fails to give sufficient weight to the spatial and economic connectivity between South Oxfordshire District and Reading Borough (and its neighbours);
- \* the plan does not provide a sustainable long term housing strategy to meet future housing needs.

2. Reflecting the new January 2019 draft Local Plan these three reasons can be re-caste as follows:

- \* the Plan fails on time. A plan which ceases in 2034 is not sound.
- \* the Plan contains no long term strategy to solve the problem of excessive house prices and rents. Therefore the Plan is not legally compliant.
- \* unlike the support the Plan offers Oxford, there is no housing support for Reading which also has no building land. The Plan therefore does not comply with the Duty to Cooperate.

3. In my opinion the Plan is not positively prepared; is not justified; and will fail to be effective in practice. Because it is not sustainable it cannot be sound.

## LESSON FROM THE PAST

4A. South Oxfordshire, like other rural councils in the Home Counties west of London fails to produce positive housing policies intended to solve the crisis of housing unaffordability. The lesson of history is harsh. Look back nearly thirty years. In 1991 Berkshire County Council produced this quotation in its new Strategy for Berkshire:

“Historically house prices in the south east, including Berkshire, have been high in relation to other regions of the UK. The Halifax Building Society estimate that in the fourth quarter of 1990 the average price of all houses in the South East was £88,936 - 33% above the average prices in the UK as a whole (£66,811). Yet average incomes in Berkshire were only 10% to 18% higher than UK equivalents. This implies that Berkshire's residents a higher proportion of their income to house purchase than the national average.

As financial institutions will only generally lend between 2.25 and three times the annual household income, this suggests that households other than those on above average incomes, or with substantial savings, will have difficulties in meeting the cost of house purchase in Berkshire”.

4B . Then what happened to house prices? What happened to affordability? I argue the collapse in affordability is the fault of past housing policies by the local councils.

## WHAT DOES FAILURE MEAN?

5. Various reasons are offered to explain why the ratio of house prices to salaries are, at say 12:1 now four times higher today than a generation ago. All the explanations come down to one common cause: excessive house prices. Increasing demand, ie. new households, (mainly due to an ageing population, not immigration) is not matched by increasing housing supply. Until this truth is accepted by local councils with land to spare, and until future building land supply planning policies change to reflect it, the transfer of wealth from the have nots to the haves will continue. This is neither satisfactory or sustainable. Others might say it is inequitable.

IS THE PLAN SOUND? IS IT LEGALLY COMPLIANT? DOES IT COMPLY WITH THE DUTY TO COOPERATE?

6. Below, on a point by point analysis are the reasons why this Plan fails the three tests.

7A. Page 5, Foreword. 'The Plan is necessarily a balance....'. Striking the right balance is the objective. Protecting the green charms of South Oxfordshire's open countryside is one priority. Making homes affordable again is a second priority. How is this balance to be found in the future without scattering into the local landscape new infrastructure and homes here and there, in a gigantic and non-stop game of catch-up which, is repeated every fifteen years: a failed formula which is simply not sustainable?

7B. A sustainable vision cannot be found in short, 15 years chunks of time. Repeating past policy failures is to ignore the lessons of the past, and not understand the needs of future generations. Think 2 x 30 years at least; say 2084.

8. Page 7, para.1.3. 'The Local Plan sets out policies for change....to 2034. It sets out a vision....'. . 2034 is half a generation away. This pocket time frame is not a realistic foundation for an effective local plan.

8B. A credible vision, that is to say a sustainable vision, is one that gives protection in perpetuity to land which is protected, for example Green Belt, AONB and SSI's; recognises what is left over is unprotected white land; and has the perspective of two generations - towards the end of the century. From this stance it is possible to decide where, and most of all where not, within the remaining (unprotected open countryside) land areas long term growth will go, long after 2034 has come and gone. Step one tells us where we will not build. Step two tells us where we might build. Step three is the sustainable vision. Step four is the Local Plan. Ignoring steps one to three is akin to building a house without foundations. This Local Plan ignores steps one to three.

9A. Page 15, para. 2.3. '....including unmet requirements from neighbouring authorities where it is reasonable to do so...'. The Plan says nothing about discussions with Reading Borough about its unmet housing needs. Why is the Plan silent on this important point? Silence does not suggest the Plan is positively prepared.

9B. For the South Oxfordshire District Local Plan to be justified it must contain recognition how many of its residents work in Reading, use Reading's public transport amenities, do their shopping in Reading and use its leisure facilities. All this evidence is omitted. A large large part of the District is within Reading's travel to work catchment area. Is silence justified? Is it an effective way forward?

9C. One of the reasons why so many companies have moved into Reading since the eighties is the beautiful countryside and charming villages north, south and west of Reading. They appeal to the decision takers and their families. But they also want fast access to London and Heathrow by public and private transport for their companies. These attractors are the key magnets which explain Reading's success as a commercial centre. This market dynamic, which explains a large part of the success of this sub-region, is ignored in the Local Plan. Omission suggests SODC has an incomplete understanding of why it is a popular location. If true, its Plan may not be effective.

10A. Page 19. Para. 3.3. 'South Oxfordshire will remain a beautiful and prosperous place to live. It will be an attractive place for people to work and spend their leisure time.' A worthy and appropriate objective is protecting South Oxfordshire's beauty and and prosperity for its existing residents. Is this all?

10B. What about the existing residents who cannot afford a home in South Oxfordshire? What about the next generation who will have to move away from their family and friends? Is their prosperity to be ignored? There is no mention of the needs of future generations. And what about the needs of all their council neighbours?

10C. Once again, striking the right balance is crucial. This paragraph is called 'Our Vision for 2034'. Simply put, it is fine if you are already a home owner, with a job in Reading, London or Oxford. But not so fine if you are new to the area, want to leave the family home and set up a new home with your new family, or are on a low national wage.

What the Vision omits is revealing. This is not positive planning. It is partial, selective planning.

11. Page 21. Para. OBJ 2.1/2.2. 'Deliver a wide range of options...Support the regeneration....'

Can we take these objectives seriously in the absence of any policies intended to significantly increase the supply of new housing of all tenure types in order to redress the affordability crisis?

12. Page 25. Para. 4.2. '...We cannot plan in isolation...'. Good news that the other Oxfordshire councils, the Oxfordshire Growth Board, Local Enterprise Partnership, ... ' etc are consulted. No mention of Reading, the biggest employment centre on its doorstep, and the front door to London and Heathrow. No mention of Thames Valley Berkshire LEP. With such omissions it is difficult to conclude this Plan will be effective.

13. Page 28. Policy STRAT1: The Overall Strategy. 'Proposals for development in South Oxfordshire will be assessed .....should be consistent with .....Meeting unmet housing needs of Oxford City..... '. The lack of recognition that the Local Plan should pay equal regard to the housing needs of Reading is striking. Is this omission justified? Does it comply with the District's Duty to Cooperate?

14A. Page 30. Para. 4.17. Recognition in the Plan of the limitations of Planning Policy Guidance is welcome. ' It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors, might have on demographic behaviour'.

14B. In order to plan sustainably for the unknowns of the future, there needs to be large scale house building land allocations, reserved areas or policy guidelines enabling decisions to be made about where additional housing will and will not be allowed. (See paragraph 8B above). Establishing this long term vision will make it easier to know where the future overspill, or unmet housing needs, from areas like east Berkshire, and Surrey-both with very little unprotected land, and from London will go within South Oxfordshire if new host responsibilities are imposed on rural councils in the future.

15. Page 32. Para. 4.26. The Plan does not mention Reading Borough or the Thames Valley Berkshire LEP here.

16. Page 37. Para. 4.45. The commitment to the DLCG 2016, Locally-led Garden Villages, Towns and Cities is welcome. If Didcot is to be self-sustaining I take this hint to be an obscure reference to its potential for future growth after the end of the plan period in 2034. If there is a serious prospect that in reality Didcot will eventually be far larger after 2034, as it is now government policy for local communities to plan their own areas, why is this part of the draft Local Plan under wraps? Is obscurity positive planning?

17. Page 83. Para.5.2. 'The NPPF directs us to significantly boost the supply of housing'. The obvious way to do so is for the District to take control of new housing supply locations. To buy lots of potential building land in unprotected areas without planning consent and build up its own land bank introduces flexibility and gives it new control. By taking this initiative the Council will also be able to capture a large part of the uplift in value when consent is granted. Financial constraints are a problem to share with the government if they are a barrier. It is the government that wants a lot more houses. The Council will be pushing open a door which is not locked. The same applies to local governance issues with neighbouring councils. This novel change in policy is the only way to substantially boost supply, start the long path back to affordable house prices and avoid the need to request Treasury support.

18. For the reasons stated above, in my opinion this Local Plan not sound, is not legally compliant and does not comply with the Council's Duty to Cooperate with its neighbours to the south. There is a solution. This Local Plan is not the solution.

~~~~~Ends~~~~~

PS Please confirm receipt of these Responses.

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Signed Ian Campbell

Dated 6th February 2019

Sent from my iPad