



Planning for Real **NEED** not Speculator **GREED** in Oxfordshire  
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## **Oxfordshire 2050 – the Joint Statutory Spatial Plan (JSSP) NNGO's Views**

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 local groups concerned with planning from across Oxfordshire. Together we represent thousands of local people.

**NNGO has welcomed the Oxfordshire Plan in principle as a positive development for the county as a whole.** However, NNGO believes that a successful outcome requires the Plan to consider:

- A restoration of planning principles, with a proper balancing of economic, environmental and social considerations;
- Local democracy, with planning control in the hands of locally elected and accountable representatives; and
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making

NNGO supports the general proposals in the recent Raynsford review<sup>1</sup>, set out in Annex 1.

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<sup>1</sup> Planning 2020, Raynsford Review of Planning in England, Final Report, November 2018

**NNGO's overriding concern is that we have difficulty accepting an offer of consultation when we fear that the Growth Board, or rather central government, has already decided key elements of the plan for Oxfordshire.**

The plan is apparently being driven by assumptions that by 2050:

- 300,000 more houses need to be built in Oxfordshire;
- That a million more people will come to live in the belt of land from Oxford to Cambridge. There will be at least 558,000 more people in Oxfordshire<sup>2</sup> (compared to an existing population of 682,000);
- That a new 'Expressway' will be created between Oxford and Cambridge. This will require a new dual carriageway link from the Oxford area to the M1 South of Milton Keynes; and
- That all this will, somehow, improve innovation in the area, increase productivity and increase GDP per head, making it somewhere like 'Silicon Valley'.

NNGO believes that a single way forward based on the above would not be:

- Realistic,
- Achievable; or
- Environmentally appropriate or sustainable.

In contrast, the JSSP should offer achievable, realistic and **different** options to local people and all of them should improve and sustain rather than degrade or damage the Oxfordshire environment. The JSSP should not be driven by a pre-existing decision that the population of the County will more or less double by 2050 (See Annex 2).

**NNGO suggests that at least one other option should be considered: continuing the existing steady growth of the County, addressing its current transport and housing problems and maintaining and improving our local and global environment.**

The JSSP approach currently appears to assume:

- That other areas of England and perhaps Wales and Scotland have plans that support this vision of vast growth. This will deny them more funding for their

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<sup>2</sup> This assumes that there are only 1.86 people per house. A more reasonable figure would be around 2.3, see Table 1 later. This gives an additional population of 690,000, doubling the county's population.

schemes, for example for the 'Northern Powerhouse'. It assumes that they will be happy to see their brightest, best and young people move to live in what will be an overcrowded 'Arc' from Oxford to Cambridge;

- That this growth will not just produce a big commuter belt for London;
- That all these extra houses, typically highly priced because land values are based on the existing price of nearby housing (see Annex 3 about the Letwin review), will somehow get built, or sort out our problems of affordability and access to housing;
- That funding and capability to increase water supply, the existing road systems and other public infrastructure, to cope with a doubling of demand is available;
- That it is possible to produce precise and accurate plans for Oxfordshire in 32 years' time. Long-term planning is welcome, but NNGO thinks the JSSP must be flexible and capable of dealing with various future scenarios; and
- That growth on this vast scale is desirable in Oxfordshire, given the inevitable damage to our countryside, natural systems and ecological treasures. The JSSP cannot ignore the pressing need to prevent further global warming by local and national changes in the next twelve years and to produce a net environmental gain.

**So, whilst we remain supportive of the JSSP in principle and recognise the need for long-term strategic planning, NNGO is adamant that:**

- A. Levels of growth should not be pre-determined or excessive, and the Plan must remain flexible.**
- B. The timetables for the Plan and the Expressway clash and must be resolved.**
- C. Environmental and social issues must be sufficiently considered.**
- D. The governance structure must be democratic and clear.**
- E. Consultation must be early, ongoing and meaningful.**

**All the above must be based on the restoration of planning principles, with a proper balancing of economic, environmental and social considerations**

## A. Excessive Growth and its associated Risks

Building 300,000 houses over the 34-year period from 2016 to 2050 gives an average rate per year of 8,823<sup>3</sup> (more details are in Annex 2).

By way of comparison, the most recent 2016 based Government Household projections for Oxfordshire for the next 25 years show an underlying 'need' (that includes some net migration) of 1,468 per year, as shown in the following table:

**Table 1 Government 2016 Based Household projections for Oxfordshire**

000s	Households by Age group				Household Population	Average Household Size
	Under 25-54	55-64	65 and over	Total		
<b>Mid 2016</b>	<b>145.666</b>	<b>45.256</b>	<b>77.389</b>	<b>268.311</b>	<b>648.229</b>	<b>2.42</b>
Change	-11.880	3.905	44.666	36.691	45.056	-0.143
Change %	-8.2%	8.6%	57.7%	13.7%	7.0%	-5.9%
<b>Mid 2041</b>	<b>133.786</b>	<b>49.161</b>	<b>122.055</b>	<b>305.002</b>	<b>693.285</b>	<b>2.27</b>
<b>Rate per year</b>	<b>-0.475</b>	<b>0.156</b>	<b>1.787</b>	<b>1.468</b>		

Considering these figures, NNGO has various comments:

### 1. The building rate is astronomical.

The proposed building rate of 8,823pa is six times more than the government's projected needs of Oxfordshire (1,468pa).

Abingdon in 2011 had around 14,000 houses. A construction rate of 8,823 will mean building a town the size of Abingdon - starting two years ago - and then every two years for the next 32 years. **NNGO thinks this is excessive and it is far, far more than what is needed by Oxfordshire.**

### 2. Mass migration would be needed

Also, each year for 34 years, it is assumed that 7,355<sup>4</sup> houses are built for people that will come from outside Oxfordshire. Even assuming the very low figure of 1.86<sup>5</sup> people per house, that is 465,130 people. So, another half a million people will be coming to live in Oxfordshire over the period. **NNGO considers that this scale of**

<sup>3</sup> So, we should already have built for two years at this rate...

<sup>4</sup> 7,355 = 8,823 – 1,468; 465,130 = 7,355 x 34 x 1.86

<sup>5</sup> 2.3 might be a more reasonable average household size, giving 575,161 more people.

**mass migration has not been factored into any national planning.** Where will all these people come from?

### **3. There is no National Plan for mass migration**

NNGO notes that the recent Raynsford review of planning<sup>6</sup> found that

***There is no integrated national spatial planning regime in England. Separate government departments and their agencies publish national strategies relevant to planning, but few of them are expressed in a spatial format that might be useful for practical decision making.***

Raynsford concludes (page 119) by saying that one of the short-term changes which would improve the planning system is to:

*■ Provide a new remit for the National Infrastructure Commission to prepare a national planning framework for England.*

**NNGO strongly supports this proposal from the Raynsford Review.**

### **4. Future housing need in Oxfordshire is overwhelmingly for older people**

Finally, NNGO notes that the Government Household projections (in Table 1 above) show that from 2016 to 2041 there will be 44,666 more households led by a person aged 65 or over. There will be fewer households led by people aged 54 and under. Overall there are only 36,691 more households, so if it was not for the growth in older households, the number of households would decline.

**Will the JSSP cater for the fact that the growth in household numbers will overwhelmingly be elderly households?**

### **5. Planning for huge amounts of growth is very risky**

There are two main problems in releasing vast tracts of land for development:

- The development may not take place at the rate planned. This means that locally we lose any control of which sites are developed first. There is also a risk that many sites will be started, but only completed very slowly. This could damage developers' timetables for their businesses and delay or even prevent any return on their investments; and
- Related to that is the government's insistence on applying a housing delivery test (both retrospective and forward looking). If this is failed, then the

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<sup>6</sup> Planning 2020, Raynsford Review of Planning in England, Final Report, November 2018, Page 38 and Recommendations 12 and 15.

government allows further sites to be zoned, in inappropriate places that are not planned for. This pointlessly penalises local people, won't produce any more houses and is likely to lead to the worst of all effects on the environment.

**NNGO considers that the JSSP must mitigate the effects of these risks in some way. One way might be to have a programme to release broad areas for growth in sequence and not simultaneously. Once the first areas were under construction or nearing completion, others might be released. This process would continue, controlling and spreading releases over the plan period as it proved necessary. The plan period will, after all, cover more than a third of a century.**

## B. The Timetables Clash

As noted earlier, **NGO does not consider that it is possible to produce precise and accurate plans for Oxfordshire in 32 years' time and that the inevitable risks should be mitigated.** As we have seen during the 18 years from 2000 to date, much can happen to change society, technology, politics and the wider world in that amount of time. 2031, which is the end point of existing Local Plans, is now 13 years in the future. The JSSP runs for another 19 years after 2031...

Interactions between the timetables of the various plans are also a concern. As illustrated in Annex 4:

**NGO's concerns and questions are:**

In February/March 2019, the JSSP will be consulting on '*preferred strategy options*' but at the same time the government will release an '*ambitious Joint Vision statement*' about the Oxford end of the Expressway. Why is the government making a '*statement*' when the JSSP is only at an early stage? What influence do local views really have over the '*statement*' and why is one being made at all? How do these two events relate to the existing Local Plans?

In early 2020, the JSSP will be submitted to the minister for inspection. Sometime in 2020, however, the route of the Expressway will be announced, as well as the locations of the necessarily massively expanded settlements. How is the JSSP going to be able to take account of the Expressway, if it does not know where it will be? Would the announcement of the Expressway route in 2020, more or less immediately undermine the work and in particular, local consultation on the JSSP?

The preferred route of the Expressway route and locations for expanded settlements will be established in 2020. What role do the agreed Local Plans play once the Expressway preferred route is decided?

Similarly, the JSSP will be adopted by 31 March 2021, But the Local Plans will still be in place and relevant until at least 2031 (and as late as 2036 in some cases). What role do the agreed Local Plans play during this ten-year period? Which takes precedence – Local Plan or JSSP - and how is this justified?

**NGO thinks that the timetable is far from ideal and difficulties will arise from this complexity. Perhaps the Expressway work should start later? Perhaps the JSSP should not start until later, maybe as late as 2031, when existing Local Plans are nearing their end dates? At the very least, the above issues**

**should be considered and the various plans (which includes three supporting plans for Transport, Infrastructure and Economy) should be reconciled.**

### **C. Environmental and Social issues**

Development on a large scale, sustained over a long plan period, runs the risk of seriously damaging the environment of Oxfordshire. The plan needs to be clearer on how any impacts will be avoided, minimised or at least mitigated. Sustainability, pollution and climate change are major issues that need to be considered. Social change – such as an aging population - and other issues also need to be considered over the longer term.

One major concern is the proposed 'Expressway' to Cambridge. The gap in existing roads from Oxford to Cambridge that the 'Expressway' will fill is likely to run as follows:

- From Oxford (or maybe from Didcot or from Abingdon);
- To the M40; and then
- South of Milton Keynes to the East of Woburn and Aspley Guise meeting the M1 at Junction 13, then onto the A421 dual carriageway around Bedford

This is around 30 miles of new road. Some short elements of this might be justified as a way of relieving the A34 around Didcot, Abingdon and particularly to the West and North of Oxford. Long-standing congestion and safety problems on the A34 and other routes are likely to be made much worse by the growth planned up to 2031 – growth to which we are already committed.

But NNGO is concerned that this local congestion and safety issue, which needs addressing, should NOT be used as a justification for the massive 'Expressway' proposal.

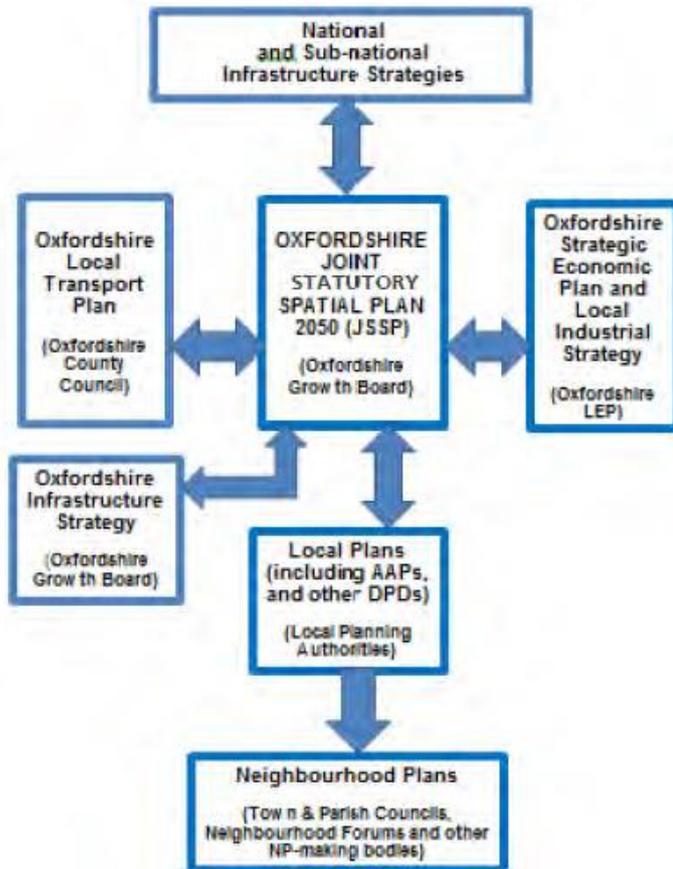
Wherever the 'Expressway' is constructed, it will cause damage to the existing environment. It may be able to thread its way round areas of special interest or protection, but this seems unlikely. Continuing and increasing our reliance on motor transport, particularly if well-known pollution issues (particularly from older diesel vehicles) are not addressed, is another concern.

**So NNGO is very concerned that environment, cultural and social considerations must form an integral part of the Plan, as objectives in their own right and with their own defined success criteria, alongside and integrated with the JSSP's economic growth objective. The JSSP must be integrated from the start with the UK's 25-year environment plan and its emerging evidence and policies at the earliest opportunity. Decision-makers must also be given the time and early opportunity to understand and access sound and comprehensive environmental surveys and other assessment information, including (but not limited to) biodiversity and abundance,**

sustainable farming practices, and opportunities for zero/negative carbon development.

#### D. Governance is confused and undemocratic

The diagram of plans in the SCI is as follows:



The JSSP potentially sits between five separate kinds of plan<sup>7</sup> covering the County and it is underneath national or sub-national plans.

As previously noted by the Raynsford Review, there is no overall national plan in fact. So, the National Infrastructure Commission can arbitrarily descend on one part of the Country and declare that huge numbers of people will move there (from where?) at enormous expense in terms of infrastructure. This sort of 'National planning' is patchy and not comprehensive, and as such, it is unjustified.

**NNGO is concerned about the lack of national planning as mentioned by the Raynsford Review.**

<sup>7</sup> The SEP and the LIS are separate beasts, as follows:

<https://www.oxfordshirelep.com/about/our-strategies/our-strategic-economic-plan-sep>

<https://www.oxfordshirelep.com/lis>

**NNGO considers that the structure above is too driven by business interests and the unelected LEP. It moves towards ignoring environmental considerations, sustainability and rural or other communities.**

This structure was further complicated by the Government's Expressway response in October 2018<sup>8</sup>. This announced that there would also be:

- An **independent business Chair** for the Arc to provide expert advice and act as an advocate and champion to help galvanise local, national and international support, particularly from business and industry, for our collective ambitions across the Arc; and
- A **Ministerial Champion** for the Arc, to provide further focus and facilitate coordination across Whitehall

NNGO is also very concerned about announcements in December 2018 that the Department for International Trade is seeking global cash to fund a series of capital projects in the Oxford to Cambridge 'Arc'<sup>9</sup> at the MIPIM conference in Cannes in March 2019. Precisely what projects and financial deals are being offered to foreign investors? Why can't funding be found through more normal routes? What consultation has there been about any of this?

**NNGO again notes with concern the focus on business to the exclusion of environmental issues generally and our local elected representatives. NNGO asks that when you have sorted out who will be taking the final decisions, will you let us know who it is?**

NNGO can only hope that the business chair is not from the development industry, that their independence is very clear and that they will fully declare their (and their relatives) financial interests in advance and if appropriate divest themselves of these interests?

The Raynsford Review picks up the issue of Power and local communities. For example, on page 56 it comments that:

*One of the major challenges for the Review was to reach out beyond the 'insiders' in the planning system to communities and individuals who are its ultimate consumers. The feedback from the community sector has been very strong and mostly very negative about planning practice.*

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<sup>8</sup> Government response to 'Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes–Oxford Arc', October 2018

<sup>9</sup> Abingdon Herald 12 December 2018, Oxford Times 6 December 2018

[http://www.mipim.com/en/homepage/?qclid=Cj0KCQiAxs3gBRDGARIsAO4tqq0oLBvRgngF0X9tpEJAC2PLStP6cN-67o49bDA6EpnUsOaid\\_eehrwaAkIbEALw\\_wcB](http://www.mipim.com/en/homepage/?qclid=Cj0KCQiAxs3gBRDGARIsAO4tqq0oLBvRgngF0X9tpEJAC2PLStP6cN-67o49bDA6EpnUsOaid_eehrwaAkIbEALw_wcB)

The Review picks up concern about making the voice of the public heard in the Nationally Significant Infrastructure Projects process, notably about HS2. There are concerns that the development sector is far better resourced than communities (page 60) and this leads to systemic feelings of unfairness. There is a perceived dominance of national planning policy. The result is deep seated mistrust and conflict between the key players.

Raynsford recommends five changes, briefly:

- 1. Ensure that plans are supported by strategic and national planning policy.*
- 2. Local Plans would be able to draw on a range of agreed data sets clearly articulated in a National Sustainable Development Plan, as proposed in Recommendation 12.*
- 3. There should be minimum standards on resilience, accessibility, etc. should be set out in either building regulations or in a new code, as put forward in Recommendation 11, would simplify the contents of Local Plans.*
- 4. Local Plans must be prepared on the same timescale to allow for coherent policy alignment.*
- 5. While there should be legal requirements to prepare and review a plan on a fixed timescale, there should be some flexibility on how it is expressed, to reflect local needs.*

Referring to these proposals, NNGO summarises the existing position in Oxfordshire as follows:

1. There is no clear national or regional policy;
2. Some data is ignored, notably the revised 2016 household projections that show lower growth in the numbers of households;
3. Building regulations enforcement is weak and new homes are not properly constructed or meeting defined insulation or zero carbon standards;
4. Our Local plans which run to 2031-2036 may be superseded when the preferred Expressway route is in place in 2020, JSSP is in place in 2021, and when construction of the Expressway starts in 2025; and
5. No doubt the JSSP will be reviewed, but not until the late 2050s?

**So NNGO supports the proposals from the Raynsford review, particularly the first and fourth.**

## E. Consultation must be early, ongoing and meaningful

The Statement of Community Involvement (SCI), paragraphs 7 and 8 says that it will:

- **inform, involve and consult** stakeholders on the preparation of the JSSP and when they will be engaged in the process;
- ensure that the JSSP will be shaped by **early, proportionate and meaningful** engagement between plan makers and communities, local organisations, businesses, infrastructure providers and statutory consultees; and
- The **outcomes** of the consultation processes set out in this SCI will be an important element of the considerations of the LPAs in developing the JSSP.

NNGO is concerned that 'early, proportionate and meaningful engagement' about the SCI so far appears to extend to one stakeholder morning workshop and then a draft of the document going to Councils for approval. One example that key decisions are in fact being taken behind the scenes is the sudden emergence of the proposal to put Arc investment projects on sale at a major international property meeting in Cannes.

Paragraphs 15 to 27 set out the consultation planned, which will have broadly six stages during the plan preparation and adoption process. The SCI promises to:

- Set up a database of consultees;
- Consult all local residents, using plain English;
- Encourage electronic engagement as the primary portal for consultation, but also allow responses by post;
- Meet data protection requirements;
- Use Panels, Reference groups or Opinion polls as appropriate;
- Produce a Sustainability Appraisal and consult on this specifically.

**NNGO supports these proposals and hopes there will be widespread and meaningful consultation, once the interactions between the plans have been sorted out.**

Near the end of the process, there will be an Examination in Public with an Inspector and a final opportunity to comment.

Raynsford concludes (page 119) by saying that one of the short-term changes which would improve the planning system is to:

■ *To support the government's ambition, set out in the Civil Society Strategy, to ensure that citizens are able to influence local decisions, the Ministry of Housing, Communities and Local Government should publish comprehensive new planning guidance on how genuine public participation can be promoted in all parts of the planning process. The last guidance was revoked in 2012.*

**NNGO strongly supports Raynsford's suggestion.**

## **CONCLUSION**

Need not Greed Oxfordshire is supportive in principle of the JSSP process and is seeking to engage constructively. We recognise this as a significant opportunity for Oxfordshire, but with that comes big risks if we get it wrong.

The level of growth must be clearly justified in relation to local need and impact. The priority is for genuinely affordable housing that is available in perpetuity.

There must be a restoration of planning principles, with a proper integration of economic, environmental and social considerations.

The JSSP should be a good example of local democracy, with planning control in the hands of locally elected and accountable representatives.

Environment and rural sustainability must be put at the heart of decision making, protecting and enhancing our landscape, nature and rural economy and communities. The JSSP must be integrated from the start with the UK's 25-year environment plan. Decision-makers must also be given the time and early opportunity to understand and access sound and comprehensive environmental surveys and other assessment information, including biodiversity, sustainable farming practices, and opportunities for zero/negative carbon development.

**The prize is well worth fighting for – an Oxfordshire with healthy and vibrant rural communities and environment, for us and future generations.**

## Annex 1 - Core principles of Planning

Raynsford reminds us, on page 19, that the Core principles of the 1947 planning system were that there should be:

- **Comprehensive control of land use**
- **Nationalisation of development rights**
- **Comprehensive land taxation**
- **Local accountability**
- **Discretionary decision-making** Plans did not irretrievably zone land but were more discretionary
  
- **Central supervision** The Secretary of State had extensive reserve powers over the planning system. In the case of New Towns these powers were clear, but for the rest of town planning they created an uncomfortable ongoing relationship over the degree to which central government should intervene over policy and practice.
  
- **The use of Development Corporations** The system assumed the use of New Town Development Corporations for large-scale growth to deal with major demographic change, using the powers of the New Towns Act 1946.

Raynsford goes on to mention that the 2005 UK Sustainable Development Strategy remains government policy and provides five overarching principles which have direct relevance for planning practice. (page 78)

- **Living within environmental limits**
- **Ensuring a strong, healthy and just society:**
- **Achieving a sustainable economy**
- **Promoting good governance**
- **Using sound science responsibly**

Raynsford suggests (page 79) that the statutory purpose of planning should be as follows:

### **The purpose of planning**

The purpose of the planning system is to positively promote the long-term sustainable development of the nation and the health, safety and

wellbeing of individuals. In the Planning Acts, 'sustainable development' means:

- managing the use, development and protection of land, the built environment and natural resources in a way which enables people and communities to provide for their social, economic and cultural wellbeing while sustaining the potential of future generations to meet their own needs; and
- promoting social justice and reducing inequality.

Raynsford concludes that:

If we want planning to be effective in securing positive outcomes for people and to command the confidence of all sectors it must be powerful and comprehensive. The evidence is clear that planning has, in practice, lost many of the necessary powers, and the results can be seen in the kinds of housing units produced through permitted development. In considering the kinds of powers which an effective system would need, there are two issues to address:

**■ The delivery of a genuinely plan-led system:**

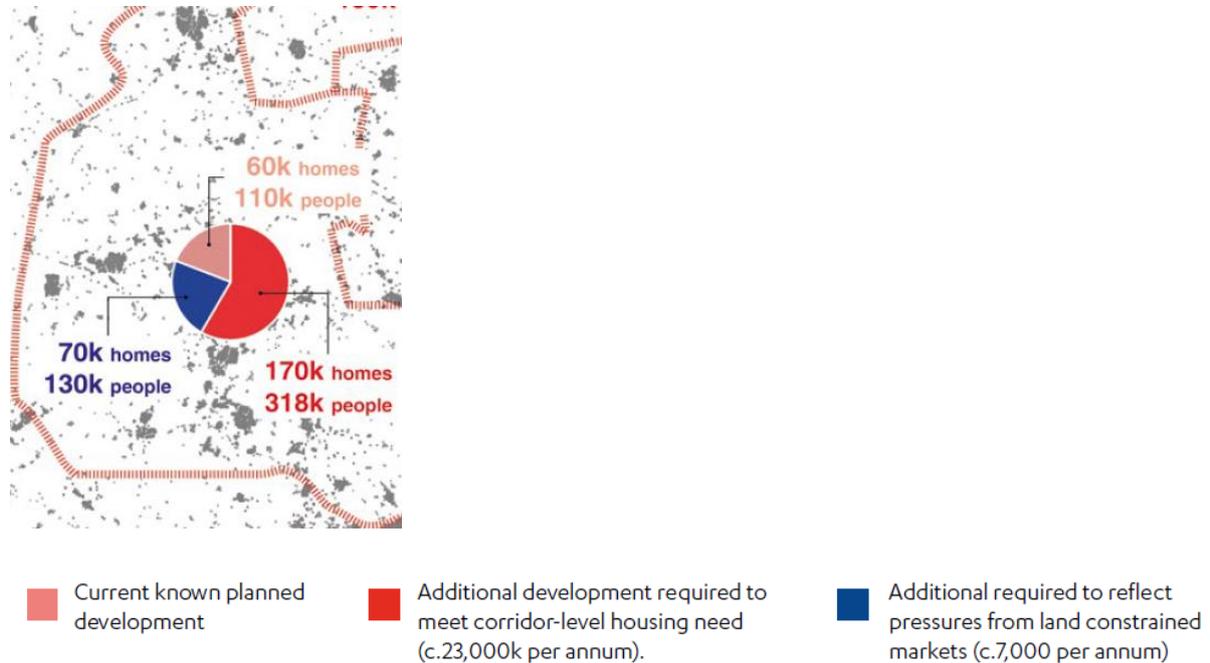
The plan should be the expression of community aspirations and the instrument for the co-ordination of growth, by creating certainty about how and where development will take place. Settling the legal status of the plan is a vital pre-condition to effective planning that can command public confidence. However, other changes are also necessary, not least ensuring that local authorities have the skills and capacity to positively implement the plan.

**■ The restoration of development management powers that have been lost as a result of the extension of permitted development rights.**

**NNGO supports these findings from the Raynsford review.**

## Annex 2 – Growth forecasts

Figure 6, page 28 of the 'Partnering for Prosperity'<sup>10</sup> report gives broad figures for Oxfordshire by the 2050:



Adding up the figures in the diagram shows that during 2016-2050, 300,000 houses could be built, containing 558,000 people in Oxfordshire. Note that this assumes only 1.86 people per house, which is really rather low.

Oxfordshire's local plans assume 100,000 houses will be built in 20 years from 2011 to 2031<sup>11</sup>. So pro rata, in the 15 years from 2016 to 2031, 75,000 might be built.

This means that the remaining 225,000 of the 300,000, might be built from 2031 to 2050.

	Years	Houses	Houses per year	People
2011 to 2016	5	25,000	5,000	
2016 to 2031	15	75,000	5,000	139,500
2031 to 2050	19	225,000	11,842	418,500

<sup>10</sup> <https://www.nic.org.uk/wp-content/uploads/Partnering-for-Prosperty.pdf>

<sup>11</sup> Statement of Common Ground, April 2018  
<file:///D:/David%20files/Planning/Joint%20Statutory%20Spatial%20Plan%20JSP/Statement%20of%20Community%20Involvement/Statement%20of%20Common%20Ground%20April%202018.pdf>

<b>Total 2016 to 2050</b>	<b>34</b>	<b>300,000</b>	<b>8,823</b>	<b>558,000</b>
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So, there would be 100,000 more houses by 2031 and 300,000 from 2016 to 2050.

The number of houses built per year would increase from 5,000 pa under the local plans to 11,842 in the last 19 years to 2050. This is an increase in the building rate of 136% - the building rate, already very high, would double.

So, the current population of Oxfordshire, which is 682,000 could double by 2050. It is far from clear where all these people will come from or where the space will be found. Most will be net migrants into the County – from where?

## Annex 3 – The Letwin Review

As land was being zoned, but building rates were not picking up to match, Oliver Letwin MP (previously Chancellor of the Duchy of Lancaster) was asked to:

*‘explain the significant gap between housing completions and the amount of land allocated or permissioned in areas of high housing demand, and make recommendations for closing it’.*

He produced a draft report in June 2018. His research found that:

*On 15 very large house building sites in areas of high housing demand, the average time to complete the whole site (once planning consent was in place) was 15.5 years. So, on average 6.5% of the houses on the larger sites were built each year. Smaller sites were built out in less time, with a larger percentage of houses on them being built each year.*

His explanation for this (our highlighting) is that:

*‘The fundamental driver of build out rates once detailed planning permission is granted for large sites appears to be the **‘absorption rate’** – the rate at which newly constructed homes can be sold into (or are believed by the house builder to be able to be sold successfully into) the local market **without materially disturbing the market price**. The **absorption rate** of homes sold on the site appears, in turn, to be largely determined at present by the type of home being constructed (when ‘type’ includes size, design, context and tenure) and the pricing of the new homes built. The principal reason why house builders are in a position to exercise control over these key drivers of sales rates appears to be that there are limited opportunities for rivals to enter large sites and compete for customers by offering different types of homes at different price-points and with different tenures.’*

**So, builders generally aim not to build so many houses that it reduces the local market prices. They have planned (bought land etc) on the basis of achieving a certain income from a site and to do this, must not build it out too quickly, as this might flood the local market.**

**Thus, perhaps counterintuitively, more house building may not reduce house prices locally and so increase affordability.**

Also, the housing built for private sale tends to subsidise the ‘affordable’ property on the site. So, the absorption rate for private sales also tends to limit the building rate for ‘affordable’ property.

Letwin goes on to note that land valuations assume that new houses tend to be sold at prices which are near to the value of second-hand homes in the vicinity. Builders buy land at prices that assume the local prices will be maintained.

Letwin considered that it would not improve matters to rely more (or completely) on small sites for house building – though they are often built faster.

Letwin also suggested that offering much more housing of varying appropriate types, designs and tenures (and, indeed, more distinct settings, landscapes and streetscapes) on the large sites, then the overall absorption rates – and hence the overall build out rates – might be substantially accelerated.

**NNGO considers that the current system of land valuation and purchase and house building and sales is unlikely to make houses more affordable, even if large numbers are constructed. Existing interventions in the housing market often seem to have had the opposite effect to what was desired.**

**Given this existing system, construction rates are likely to slow if there is any concern that they reduce local house prices. This would have a dire effect on the very high growth scenario that is currently being planned for.**

**Considerable intervention in the market for housing land, the housing market itself and perhaps employment will be needed to make houses more affordable.**

## Annex 4 – Timetables – Local plans, JSSP, Expressway

Local plans	Joint Statutory Spatial Plan	Expressway (Oxford to M1)
2011 Local plans start		
December 2016 Vale plan Part 1 adoption		
	Sept 2018 Approve Local Development Scheme	
	Dec 2018 Approve SCI	
	Sustainability Appraisal Scoping Report?	
	Call for Strategic Development options from landowners, public?	
	Jan 2019 Approve preferred options	
	February / March 2019 Consultation on Preferred Strategy Options (Regulation 18)	The government is working with local partners to prepare an ambitious Joint Vision Statement by Spring 2019.
	October / November 2019 Proposed Submission Draft Plan produced and is consulted on / submitted to the Minister (Regulation 19)	Autumn 2019 Public consultation on route options
	31 March 2020 Submitted to Minister and inspectorate	2020 Preferred route announcement Locations for expanded settlements established.
	Sept 2020 EIP Dec 2020 Inspectors Report	
	31 March 2021 Adoption	
		2025 Route agreed, Construction starts
	2030 end of 1 <sup>st</sup> Strategy phase JSSP new evidence base starts	2030 Expressway opens
2031 Existing Vale plans end, Deadline for 100,000 SHMA houses		
2036 Last end date for some local plans		
	2040 end of 2 <sup>nd</sup> Strategy phase	
	2050 End of 'Strategic Framework'	

From: JSSP Scoping document & SCI, Expressway Corridor B Announcement September 2018

Past events	
<b>Areas of overlap and concern are highlighted in colours as follows</b>	
Feb/March 2019 - JSSP is consulting on preferred strategy options, when a government 'statement' is expected. The Expressway route options are not known until 2020	
Expressway route and expanded Settlements established, though Local Plans still in play	
JSSP and Local plans overlap	

## **NNGO's concerns and questions are:**

In February/March 2019, the JSSP will be consulting on 'preferred strategy options' but at the same time the government will release an 'ambitious Joint Vision statement' about the Oxford end of the Expressway. Why is the government making a 'statement' when the JSSP is only at an early stage? What influence do local views have over the 'statement' and why is one being made at all? How do these two events fit into the existing Local Plans?

In early 2020, the JSSP will be submitted to the minister for inspection. Sometime in 2020, however the route of the Expressway will be announced, as well as the locations of the necessarily massive expanded settlements. How is the JSSP going to be able to take account of the Expressway, if it does not know where it will be? Would the announcement of the Expressway route more or less immediately undermine the work and consultation done for the JSSP?

The preferred route of the Expressway route and locations for expanded settlements will be established in 2020. What role do the agreed Local Plans play once the Expressway preferred route is decided? Similarly, the JSSP is adopted by 31 March 2021, But the Local Plans will still be in place and relevant until at least 2031 (and as late as 2036 in some cases). What role do the agreed Local Plans play during this period? Which takes precedence – Local Plan or JSSP - and how is this justified?

Other plan timetables will be running alongside this, for the:

- Oxfordshire Local Transport Plan;
- Oxfordshire Infrastructure Strategy; and the
- Oxfordshire Strategic Economic Plan and Local Industrial Strategy

**NNGO thinks that the timetable is far from ideal and difficulties will arise from this complexity. Perhaps the Expressway work should start later? Perhaps the JSSP should not start until later, maybe as late as 2031, when existing Local Plans are nearing their end dates? At the very least, the above issues should be considered and the various plans reconciled.**

## **Annex 5 – Strategic Policies of the JSSP**

Paragraph 3.7 of the Scoping Document says that the JSSP's strategic policies will cover the following matters:

1. County wide housing requirement figures
2. Affordable housing requirements
3. Identification of strategic growth areas
4. Strategic housing trajectory
5. Gypsy, Traveller and boat dwellers, needs and distribution
6. County wide employment growth figures
7. The spatial dimension of the Local Industrial Strategy
8. Retail hierarchy
9. Green Belt strategy and policies
10. Biodiversity and natural environment
11. Placemaking and built environment
12. Health and wellbeing
13. Green infrastructure
14. Strategic environmental allocations
15. Transport strategy
16. Infrastructure strategy
17. Energy framework