



Oxfordshire 2050 Reg 18 (2) Consultation, Autumn 2021 - Need not Greed Oxfordshire main response

Need Not Greed Oxfordshire (NNGO) supports the principle of the Oxfordshire 2050 Plan and long-term county-wide strategic planning. However, forecasting thirty years into the future is difficult. In 1990, if you had predicted events like the Millennium Bug, the Banking crash, iphones, the 2012 Olympics in London, Brexit, the Covid pandemic, that the ten hottest years ever recorded in the UK would all be after 2001¹, and that the weather would be getting more erratic, extreme and dangerous to life of all sorts across the world - nobody would have believed you - but you would have been right. Similarly, trying to predict what Oxfordshire will be like in 30 years is nearly impossible. The only certainty is the uncertainty.

Given that, **caution, planning for a range of options and mitigating risks are key.** NNGO's view is that **all three are missing from the 2050 plan**, though it does attempt to identify the key risks to our environment. For plans this far into the future, we would have expected something based on past trends but also considering other issues and allowing for increasing uncertainty as we went further into the future. Instead, we have a plan that focuses on extreme increases in housing development but also promises a zero-carbon economy. NNGO is strongly opposed to the proposed level of housing development. NNGO also believes that it is not possible to deliver the proposed levels of housing and at the same time a zero-carbon economy.²

NNGO instead thinks that councillors need to do a 'Kickflip Indy'² on the plan and completely change direction to the lowest or even a lower rate of growth - whilst staying firmly on top of the environmental skateboard.

Our response is in 2 parts:

Firstly, this overall response on the key themes and objectives of the Oxon 2050 Plan, which sets out our concerns and the alternatives we would like to see.

¹ According to the Met Office, the ten hottest years in the UK have been, in order 2014; 2006; 2011; 2007; 2017; 2003; 2018; 2004; 2002; and 2005. 1892 was the coldest. 1962 was the tenth coldest...

² See Sky Brown, Bronze Medal, Women's Park STokyo Olympics 2020

Secondly, two technical papers which take an in-depth look at the Oxfordshire Growth Needs Assessment (OGNA) which informs the OP2050 Plan and is the basis for the Growth Options:

a) Where do we start from?

This assesses the surprising and off-piste approach that the OGNA takes to population figures, out of line with Government methodology

b) What's wrong with the 3 growth options?

This provides a critical analysis of other elements of the OGNA

NNGO's overall conclusion on the OGNA is that it is sufficiently flawed that it should be subject to an independent peer-review before it can be relied on as an appropriate evidence base for the OP2050 Plan.

NNGO's Concerns

NNGO is concerned that Oxfordshire's environment will be damaged by excessive housing and population growth. We are presented with three options, all of which accelerate such growth - the most extreme one would increase the urban area in Oxfordshire by 50% by 2050. **This means finding space, resources and infrastructure for a new Banbury and Abingdon and Bicester and Witney and Wantage AND the whole of OXFORD, by 2050**³.

We need more genuinely affordable and social housing, not just vast amounts of expensive new housing driven by the current developer free-for-all.

We do not think that the current housing system is working. Building more new, expensive houses has not and will not solve the affordability problem. Having more private renting has not helped and will not help either, nor will allowing second homes particularly if they are funded by converting them to part-year business rentals. Instead, a focused approach on allowing affordable house providers more funding and priority would be more effective. As would removing schemes that push up house prices such as the recent stamp duty holiday⁴ or 'help to buy'⁵. And environmentally, building more new houses with poor insulation and heating systems that pump out CO2 is unacceptable.

'Levelling up' the rest of the country will not be possible if there is so much development in the South East between Oxfordshire and Cambridgeshire. Development on a massive scale will make a zero-carbon green and sustainable future for Oxfordshire impossible.

Excessive housing and population growth in Oxfordshire can only be enabled by getting people to move here from other areas. Migration from abroad⁶, which has generally driven past growth in the County, can no longer be depended on. As migrants tend to be younger and more skilled, attracting a lot more migrants to Oxfordshire will worsen inequalities in other parts of the UK (as well as overwhelming our infrastructures).

The Oxfordshire economy has been hit by the continuing Covid pandemic. In particular, our reliance on foreign tourists and students may be reduced in the

³ **'What effects do the plan options have?'** and **'What's wrong with the three options'** are separate technical papers that criticise the artificially inflated assumptions the 3 options are based on.

⁴ This cost £1.3Bn and is one reason for increasing house prices and profits for developers. Savings from the reductions can be taken by the seller rather than the buyer. 'Help to buy' has similar effects.

⁵ Help to buy makes you able to buy a house that is more expensive than you can afford. Sellers know this and so can increase the prices they charge. There can be difficulties when interest has to be paid on the loan from the government, after five years.

⁶ See Table 3.5.1 OGNA Phase 1 report. Over 17 years Net Internal migration -20,175, Net International +52,092.

long term. Brexit has had some economic consequences⁷. The furlough scheme has yet to unwind. **Economic growth in the last two years will have been restricted by the pandemic⁸ - yet the plan anticipates that rapid growth based on the two years before that will return and continue for the next thirty years.**

Oxfordshire's previous Local Plans have over-provided housing land compared to past trend rates of growth and the needs of existing residents. **The previous plans currently have space for over 85,000 new houses in Oxfordshire⁹.**

Trend based Figures based on the Office for National Statistics (ONS) 2018 based projections suggest that we only need around 53,000 houses more in Oxfordshire between now and 2050 and we will have 67,000 more people in households. That figure allows for more net in-migration than the average for 18 years - so a higher rate of growth than in the past. **The government produced, ONS 2018 based projections, strongly suggest that we do not need any more land at all to be zoned for housing before 2050.**

NNGO totally disagrees with the inflated OGNA projections on which the plan is based. These assume that there are 26,000 more people living in Oxfordshire in 2020 than the ONS (the government's Office for National Statistics) says. They also add 50,000 more people to the ONS figures for Oxfordshire by the end of the Plan period¹⁰.

We are concerned that affordability and inequalities within Oxfordshire and England will continue. Why does one of the richest countries in the world have so many people who rely on foodbanks? We want decent, secure lives and a future for all children. Growth in the last decade or so, founded on low interest rates, has pushed up asset prices¹¹ (housing is one example) but wages have stagnated and fallen behind inflation. Consider the proposed 3% rise for nurses that is not an increase in real terms (let alone a reflection of their value in the crisis). These issues increase inequalities and affordability problems - they could be changed.

⁷ More checks/paperwork is needed on imports and exports to the EU (by vets, customs agents and about VAT) and one reason for the shortage of HGV drivers and resulting supply chain problems is that EU drivers left and have not returned.

⁸ In 2020 there was a record breaking 9.8% reduction due to the lockdowns. In 2021 a recovery is in progress, but this is very unlikely to recover the 9.8% reduction. In the long term we may not get back to where we might have been according to the IFS

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/bulletins/gdpmonthlyestimateuk/june2021>

<https://ifs.org.uk/uploads/Public-finances-yet-more-tax-rises-ahead.pdf>

⁹ 78,049 remaining to be built in local plans and 7,405 to be built beyond the end of the Local Plans (Consultation document, page 129, Para 434,435).

¹⁰ **Where do we start from?** Is a separate technical paper that comments on the increases to the government's 2018 based population and household-based figures. This highlights the assumed 26,000 increase in Oxfordshire's population in 2020 and the assumed 76,000 increase by 2050. These changes add growth of almost 50,000 people in the plan period to the government's projections

¹¹ See Unravelling Quantitative Easing, by David Prosser, CIPFA Public Finance magazine September/October 2021

Inequality is also driven by employment opportunities. The previous Local Plans were founded on assumptions that more well-paid jobs would emerge in Oxfordshire, often in high-tech industries or research. In practice, there have been more jobs, but they have too often been minimum wage, zero hours contracts or low-grade self-employment (where all costs and risks are dumped on the employee). Covid has tipped us further into an economic system that creates more low-paid jobs in warehouses (soon they will be almost completely automated), delivery vans and closure of many high-street shops.

NNGO Alternatives

NNGO wants the Oxfordshire 2050 Plan to give us a better, fairer and more environmentally sustainable County.

We acknowledge that the current plan attempts to highlight our (and many others) environmental concerns. But we emphasise our view that massive physical development will be a fatal distraction from sorting out our environmental problems. The citizens of an environmentally burnt-out, flooded and urbanised Oxfordshire in 2050 will not thank us for making this mistake.

NNGO wants:

- **To prevent our environment from being damaged by the excessive growth that is planned.**

Why doesn't the Oxfordshire 2050 plan have an option that continues the existing trend of steady growth?

The total housing requirement should be set at the lowest possible figure. Preferably lower than the Option 1 Standard Method, which is still substantially above that needed to cater for the existing population.

There should be an option for Oxfordshire to grow organically, based on up-to-date natural population growth numbers produced by the Office for National Statistics, **with the focus on making housing in the area more affordable.** Policies on restricting buy to let and introducing a tax on land value uplift would help. Policies enabling housing association and council houses on brownfield sites would also be enormously helpful.

The OGNA should be independently peer-reviewed to address the flaws outlined in our other response papers.

- **To keep Oxfordshire green and make it 'greener'.** Current economic and energy systems are unsustainable and need to change very rapidly indeed. Climate change is upon us and we have left it late to respond so we will pay the price with extreme weather events for the indefinite future. We should focus on sorting out these problems, rather than being deceived into thinking that vast amounts of housebuilding, roads, vast reservoir etc will dig us out of the hole. Growth distracts us from our various environmental crises. We need to understand and stay within our nine planetary boundaries - climate change, ocean acidification, chemical pollution, nitrogen and phosphorus loads, freshwater withdrawals, land conversion,

biodiversity loss, air pollution and ozone layer depletion¹². Water supply is a key constraint on future growth in Oxfordshire. We do not want a new vast reservoir in Oxfordshire! Even were it to be needed, we could pump water from other distant catchment areas, but why not develop in those areas? There is no clear regional or national plan, but a set of agencies that mask that omission¹³. Support for active travel, including adequate cycle infrastructure, is a priority. Overall, we face enough environmental issues without compounding them with excessive development.

- **To support the Oxford to Cambridge rail link**, which we think should be powered by electricity, not diesel fuel. However, we disagree with the ‘Arc’ proposals and the possibility of an Expressway by stealth. These unwanted impositions from central government, are Trojan horses to allow vast amounts of house building. Constructing hundreds of thousands more houses in the ‘Arc’ will seriously undermine attempts to ‘level up’ at the national scale. They could end up as mere dormitories for commuters¹⁴ to London, or they may never be built at all.
- **We want our Council Leaders to resist all attempts by central Government to impose an increase on the number of houses to be built in Oxfordshire as part of the OxCam Arc proposals.** Local and by-election results over the last couple of years suggest that a great many members of the public share our concerns and we ask our elected representatives to engage robustly with government to rethink its strategy for Oxfordshire and focus instead on their election promise of levelling up the UK - creating jobs where people already live.
- **Finally, we want real consultation about planning issues.** This means presenting people with a full and reasonable range of options for housing growth options in Oxfordshire’s case, not just a choice between three unsustainably large figures. This message also applies strongly to any changes to the Planning System that might weaken local democratic input, as seems to be implied by the Government’s proposed White Paper on planning and the impending Planning Bill.

¹² See Kate Raworth, Doughnut Economics

¹³ LEPs, ‘Growth’ Boards, English Economic Heartland, Arcs and Expressways.

¹⁴ Who may work at home on many days, so avoiding too much commuting



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About Need Not Greed Oxfordshire

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, representing thousands of community members. Our campaign is committed to:

- 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
- Environmental and rural sustainability, ensuring that our landscape, natural world and rural communities are at the heart of decision-making.