NEED not GREED OXON

Oxfordshire 2050 Reg 18 (2) Consultation, Autumn 2021 – Need not Greed Oxfordshire

WHAT'S WRONG WITH THE GROWTH OPTIONS?

The Oxfordshire Growth Needs Assessment (OGNA) informs the OP2050 Plan and is the basis for the three Growth Options outlined within it. This is the second of two NNGO technical papers analysing the OGNA, providing further critical analysis.

Please refer also to the NNGO Main Response and our other technical paper – Where do we Start From? – which looks particularly at the approach the OGNA takes to population figures.

SUMMARY

This paper analyses the underlying evidence base behind the three growth options presented and questions the robustness of the methodology used.

NNGO's main concerns include:

1. The Plan envisages that the number of dependents per 100 people of working age will increase from 29 to 43, by 2040, and indicates that this issue can be resolved by encouraging more people of working age to move to Oxfordshire. However, this does not resolve the problem; it merely moves it around, to the detriment of other parts of the country.

2. The variation across / impacts on different Districts are almost completely obscured. For example, arbitrary amendments made by the author of the OGNA result in +3,750 more houses for the Vale and -5,670 less for West Oxon. Just two areas are considered – the 'Knowledge Spine South' (Didcot & Wantage) and the 'City Fringe' – they could end up with the vast majority of the proposed housing development despite potential impacts on the AONB and Green Belt.

3. The Consultant relies on figures from the 'Annual Population Survey' for net in-commuting to Oxfordshire. However, ONS now say that these figures are not reliable and it no longer publishes them.

4. Affordable housing issues will not be resolved by excessive housebuilding but require other fiscal and social measures. Technical decisions made by the consultant when making the household forecasts, which increase the numbers of households projected, mean that part of the need for affordable housing is effectively double counted.

5. Despite all the information provided, the OGNA fails to give the final level of population anticipated in Oxfordshire by 2050. NNGO's assessment is that the transformational growth option would lead to a county population of over 1million (compared to around 700,000 today) – a 43% increase, which would place an intolerable burden on infrastructure, services and our environment.

We need economic growth that stays within all our planetary boundaries[1]. This means that the Oxfordshire Plan should be more ambitious in carving out a new non-carbon based, sustainable economy.

> **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.**

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[1] See Kate Raworth, Doughnut Economics

THE GROWTH OPTIONS

Section 8 of the Phase 1 OGNA report starts with a general statement, as follows:

> *As noted in previous chapters, there is evidence to suggest that the particular economic characteristics and wider strategic context of Oxfordshire are such that additional consideration is required to assess the compatibility of the Standard method of housing need assessment with wider growth ambitions for the sub-region, or whether significant differences exist.* (page 98)

The Oxfordshire Plan 2050 consultation proposes 3 different growth options:

- **Standard Method** – 102,000 houses – 1 new house for every 3 we have now

- **Business as Usual** - 123,000 houses – far above existing growth rates; and

- **Transformational** – 153,000 houses - 1 new house for every 2 we have now

The Oxfordshire 2050 plan explains these high figures by making projections that say Oxfordshire's economy will grow rapidly for thirty years. This will supposedly increase job opportunities and attract very large numbers of people to come and live here. It is not clear where these people will come from, or whether the plans for the places they come from allow for that.

None of these three options are based on continuing past trends. As we have seen in the earlier paper ('Where do we start from') 26,000 more people have been added to current ONS population estimates and 76,000 are added to the ONS 2018 based population projections.

NNGO does not support any of the three options. But we believe that Oxfordshire may be forced to accept the 'Standard Method', which may be the government's target.

NNGO disagrees with the government's national target of 300,000 houses a year which has not been justified[2] - projected growth is typically around 200,000 households per year in England. NNGO does not think that any high figure should be forced upon us or our councillors, or that there is an unchallengeable need or requirement to do that. Oxfordshire seems likely to have a good economic future and it may grow faster than the standard method implies, but that could, if it was wanted and needed, be accommodated by reviewing and amending the plan during

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[2] The 2018 based ONS figures show that over the period 2021 to 2043, the average number of households increases by 192,000 per year, well short of 300,000. Based on an increase from 23,717,788 to 27,941,788 over 22 years.

the next thirty years. We do not have to commit now to excessive growth that may never materialise. It would be unwise to do that.

NNGO estimates that to meet the 'Transformational' option, around 11,000 net migrants will have to come to Oxfordshire every year for 30 years. This is far more than the average amount per year for the last 19 years, which was around 2,000 (from ONS mid-year population estimates). In the last 19 years, the most net migrants into Oxfordshire that we ever had in a single year was just under 4,600 in 2005.

NNGO has calculated that the Transformational option would be equivalent to constructing new settlements in Oxfordshire that were the size of Oxford, Banbury, Abingdon, Bicester, Wantage and Witney.[3]

So NNGO does not think that the 'Transformational' option is anything other than a property developers' pipe dream. It is a damaging vision for Oxfordshire.

NNGO thinks that environmental and climate crisis problems that we clearly face are far more important and should be the one true focus for this plan.

The following sections make detailed comments on the economic forecasts that drive the planned increases. Our comments are arranged in the order of the Sections in the 'Phase 1' report.

This note ends by setting out NNGO's views on the spatial options in the plan (in the 'Phase 2' report) and then on economic growth.

The Oxford – Cambridge Arc (Sections 1 and 2)

NNGO is opposed to the concept of the Arc. It encourages excessive amounts of development in the SE, and if further growth is pushed onto Oxfordshire, will add to our infrastructure and congestion problems and damage our environment. But NNGO does think that an electrified East-West rail link could provide low-carbon benefits.

Why is so much growth predicted for Oxfordshire? (Section 2.7)

The 'Local Industrial Strategy' (LIS) is one reason for the over-optimistic view of Oxfordshire's economy. The LIS was produced by the 'Local Enterprise Partnership' an unelected body that has no democratic credentials or credibility. It was signed off by Government, without public consultation or scrutiny by local councillors. The LIS only runs to 2040, leaving a third of the plan period out of its

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[3] Based on assuming that the 148,329 extra households will have on average 2.23 people each, so a population of 330,000. The settlements listed have ONS estimated populations in their built-up areas in 2019 of 162,000, 47,000, 40,000, 33,000, 30,000 and 20,000.

scope.   NNGO therefore contends that comparatively little – if any weight should be placed on any of the LIS targets.

Household Representative Rates (Section 3.10, 3.11, 7.4)

Section 3 considers the 'Household Representative Rates' (HRR). These are multiplied by population figures (broken down by age) to project the numbers of households. The population projections are multiplied by the HRR's to give a projected number of households.

NNGO is concerned that there is no detailed explanation of the changes in HRRs and no justification for changing them for the 35-44 age group. Also, we consider that there is a danger of double counting households needing affordable property. Increasing the HRRs will generate more households, but this does not seem to be allowed for in the affordability calculations made later.

The HRR are based on Census figures. The 2011 Census figures are the most recent figures. HRRs for the last three sets of ONS household forecasts have been estimated as follows:


2014 based – Based on trends from the 1971 Census to 2011 (Page 40).

 Recommended by the government for HRR projections

2016 based – Based on trends between the 2001 and 2011 Census

2018 based – Based on trends between the 2001 and 2011 Census

Figure 3.10.1 compares the HRRs resulting for 2008 based HRRs (a much earlier version) with the HRRs for 2014 and 2016 (2018 HRRs are not shown). For the 25-34 age group, changes in HRRs are as follows:
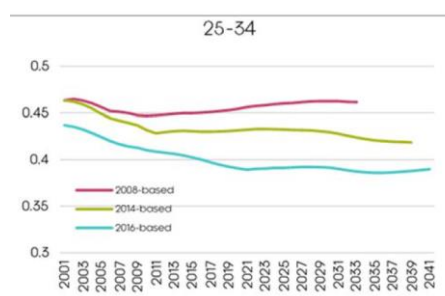
It is reasonably clear that HRRs are lower in the 2014 and 2016 based figures (blue and green lines) than in 2008 (red line). As time passed, it has apparently been more difficult for younger people to form a separate household than it used to be.

NNGO thinks this is partly a result of changes in the jobs market as well as changes in housing supply. The existing housing supply system has rising house prices - pushed up by low interest rates and stamp duty holidays etc. This is compounded by worsening conditions in the jobs market, with stagnant wages, insecurity, low pay, zero hours contracts and low-quality self-employment. Affordability has been reduced by increasing prices but also by worse jobs for the young buyers.

However, in the 35-44 age group, there is less difference in HRRs, as follows:
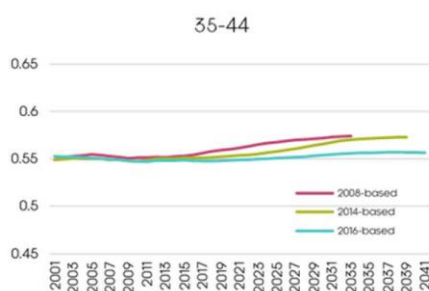
In other age groups, noticeable differences for the 2016 based figures compared to 2014 and 2008 are:

Age 45-64 – 2016 based HRRs are higher

Age 65-74 – 2016 based HRRs are lower

Age 75-84 – 2016 based HRRs are higher

Age 85+ – 2016 based HRRs are higher

So higher HRRs in later age groups may compensate for the issues for people aged 25-34. In effect, there is a 'swings and roundabouts' effect here, with no clear overall pattern that 2016 based HRRs are lower or higher than the others.

Only by applying the HRRs to a set of population data can the differences in the number of households generated be observed. Tables 3.11.1 and 3.11.2 do this and the overall results for Oxfordshire for 2018-43 are as follows:

Extra households, 2018-2043	Household Representative Rate (HRR) option		
	2014 based	2016 based	2018 based
2018 based population	37,670	35,264	*43,479* [4]
Change	+23,547	+23,084	
2018 based population increased by the consultant	61,217	58,348	Not available

The 2018 based HRR projections apparently produce households that are more than the 2014 or 2016 based HRRs (43,479). No matter, the consultant has increased the population figures by 26,000 in 2020 and 76,000 in 2050 (see previous discussion in our note 'Where do we start from') and then chooses the 2014 based figures giving an even higher figure of 61,217.

These arguments are picked up in Section 7.4 which says what is used:

Household Representative Rates (HRRs) from the 2014-based subnational household projections (SNHP) and a part-return to trend method for the 25-34 and 35-44 age groups

NNGO has the following criticisms:

- **There is no detailed explanation of the changes made in the HRRs.**

- **There is little justification for changing the HRRs for the 35-44 age group.**

NNGO disagrees with these partial revelations, explanations and manipulations. They all tend to increase the need for more expensive new housing in Oxfordshire – an approach that has failed over several years to solve our housing problems.

NNGO also knows that increasing headship rates means increasing the projected numbers of households. This means making an assumption that as more people aged 25-34 years can form a separate household, so they will – for example - no longer be part of another household. So, using higher HRRs means that the affordability problems mentioned are easing, and affordability is increased.

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[4] Not shown in the tables, but from the ONS projections $43,479 = 315,751 - 272,272$

Regrettably, NNGO sees no reason why that will happen, given the many policies and problems that have, for years, reduced affordability.

Also, NNGO is concerned that making adjustments for affordability by changing HRRs means that the separate calculations for affordability 'double count' that need.

Conclusions (Section 3.12)

NNGO disagrees with pretty much everything said in this section. There is clearly no acceptance of the fact that amending the headship rates (HRRs) is in effect an assumption that affordability will be increased.

Increasing HRRs means that more households will form from the population and so affordability problems will be reduced – as NNGO wishes. But we have seen no evidence that affordability issues will be solved unless several other approaches are adopted.

Conclusions (Section 4.5)

This section says:

> *Against this context, the Government's Help-to-Buy Scheme has been important in helping to support the market in recent years; and the short-term Stamp Duty holiday introduced by Government in July 2020 will help to support the market.*

NNGO disagrees. Our view is that these schemes, far from making housing more affordable, tend to further increase house prices. The Stamp Duty holiday cost £1.3Bn and house prices rose. Demand was also increased because people wanted to move home after the lockdowns.

Savings from the reduction in the cost of buying – by the Stamp Duty holiday for example - can be and are often taken by the seller rather than the buyer. So, prices increased and the sellers' benefit. 'Help to Buy'[5], and many similar earlier schemes have had a similar effect, increasing house prices and profits for developers. Affordability has got worse…

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[5] Help to buy means the government takes a share of the property you buy and you don't pay interest on the loan for 5 years. This means you may be prepared to buy a house that is more expensive than you can afford. Sellers know that and take advantage by pushing up prices.

Working Age Population (Section 5.5)

Section 5.5 describes the issue of the aging population in Oxfordshire. Currently there are 29 dependents per 100 people of working age. But this is likely to rise to 43 in 2040.

This problem can be 'solved' by encouraging more people of working age to move to Oxfordshire. However, if these people come from other parts of the UK, then that is merely moving the problem around, not solving it. And would other areas agree to losing their youngest people and workers? This is a key problem with the consultant's plan to drastically increase net migration into Oxfordshire.

7.1 Oxfordshire's Housing Need using the Standard Method

The Government's Standard Method, based on ONS 2014 standard household projections plus 'affordability uplift' is the starting point. This gives:

Household increase (2020-2030) 23,869

Plus 'affordability uplift   33,830

With 40% cap   33,500

Source: table 7.2.2.

For Oxfordshire 2050 the 2020 to 2030 increase is simply extended to 2050 by multiplying by 3 to give a total 2020 to 2050 figure of 101,490 extra houses needed.

This procedure has two flaws:

Firstly, **the 2014 based household projections are considerably out of date and overestimate the household growth** (because of declining fertility rates and international immigration). The government continues to refuse to use the later figures that have changed and that ONS have produced. The 2018 base projections suggest a 2020 to 2030 growth of 19,161 households (compared to 23,869 for the 2014 base).

Secondly the simple extrapolation of the 2020 to 2030 figures out to 2050 is decidedly dubious as the growth rates decline with time. The 2020 to 2030 annual percentage increase is 0.68% whereas the 2030 to 2040 increase is 0.53% and the 2040 to 2043 increase 0.46% (note that the 2018 ONS projections only go to 2043).

So, the 2030 to 2040 increase should be 26,367 and the 2040 to 2050 22,885 and the total standard method 2020 to 2050 should thus be 83,082. **This incorrect extrapolation exaggerates the housing need by 22%.**

Taking into account both these effects the housing need 2030 to 2050 by standard method should be 69,567. This of course still assumes that building 40% more houses than we need will bring the price down – an assumption that NNGO has been repeatedly questioning.

The OGNA goes on to make its own calculation. This uses the 2018 population projections and the 2014 house occupancy figures, all well and good but they then adjust the 2020 baseline to take into account the discrepancy between the ONS population estimates and the Patient Register figures – the latter being generally higher. The result is in Table 7.3.1 which comes up with a figure of 33,860 for the ten years 2020-30. Workforce figures and economic growth is then estimated from these figures, in Section 7.4.2.

The methodology, almost magically - and maybe deliberately, produces a projection for housing need for 2050 which is very close to the dubious Government's Standard Method, in this case 101,580. So, has the demographic baseline been increased to the point at which it gives the number first thought of?

Standard Method – Adjusting demographic baseline (Section 7.3)

This section says:

> *'there are notable issues with the demographic data for Oxford in particular, where past population growth appears to have been under-estimated.'*

NNGO disagrees. Our separate note 'Where do we start from?' questions the consultant's addition of over 26,000 people to the ONS population figures for 2020 (and over 76,000 to 2050). The population of Oxford has fallen for two years, between 2018 and 2020[6].

NNGO does not think the Consultant's changes have been justified or are reasonable. They were not even explained properly. NNGO considers that only the 2021 Census results – due shortly - will give a more accurate figure for Oxford and Oxfordshire.

It follows that NNGO does not think that the consultant's changes to the Standard Method calculations that follow, in Figure 7.3.1 are acceptable.

In particular, the consultant completely fails to mention that, although the Oxfordshire total does not change significantly (only rising by 36 from 3,350 to 3,386) the effects at the district level are considerable, as follows:

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[6] ONS figures fall from 154,327 (2018) to 152,457 (2019) to 151,584 (2020) so a fall of 2,743

Housing need, dwellings per year	Cherwell	Oxford	S. Oxon	Vale	West	Total
2014 based Table 7.2.2	756	762	608	661	563	3,350
Change	+90	-33	+42	+125	-189	+36
Adjusted demographic baseline Table 7.3.1	846	729	650	786	374	3,386

Thus, the large amendments proposed by the consultant add 125 to the Vale and deduct 189 from West. Those figures would all be multiplied by 30 for the 2050 plan of course, so that means +3,750 more houses for the Vale and -5,670 less for West.

This is not mentioned by the consultant.

Conclusions (Section 7.5)

At the end of this Section, various figures for the growth in the number of dwellings needed are brought together. This again illustrates the consultant's tendency to add 'need' wherever possible, whilst not properly explaining what is going on.

The dwellings figures 'needed' are as follows:

Option	Source	Rate pa	30-year total	Change
Capped figure	Table 7.2.2	3,350	100,500	
				+990
No cap figure	Table 7.2.2	3,383	101,490	
				+90
Based on consultant's population estimates	Table 7.3.1	3,386	101,580	

The 'cap' is added to limit Oxford's figure at 40% above the projected household growth - so that the growth expected there is not excessive (page 91 of the OGNA Phase 1).

The lowest, 'Capped figure' is calculated using the government's approved method. That could be our target! The cap is applied in Oxford only, and allows for 'deliverability' there.

The consultant's view is that the cap is not appropriate (why?), so they propose the 'No cap' figure and their own projection. This adds 990 dwellings – not that many overall but all in Oxford or more likely, overspilled to other districts/the Green Belt from there.

The consultant then goes on to calculate, and recommend, a figure based on their own population estimates (26,000 more people in Oxford in 2020 than ONS, 76,000 more in 2050) and that adds another 90 dwellings. Again, strangely close together.

NNGO does not accept the consultant's amended population figures[7] and considers that this is yet another illustration of their bias towards increasing the figures wherever possible.

Again, the consequences of the consultant's revised population estimates are hidden. The changes to individual district dwelling figures over 30 years – from capped to consultant are as follows:

Cherwell	Oxford	S. Oxon	Vale	West	Total
+2,700	-990	+1,260	+3,750	-5,670	+1,050[8]

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[7] Preferring to wait for the 2021 Census results before agreeing anything
[8] Not the same as 990+90 in the previous table, due to rounding issue in Table 7.3.1

So, the small change at County level hides very considerable redistribution within Oxfordshire's districts. Again, not mentioned by the consultant…

Economic models and the options (Section 8)

Two economic models are considered in Section 8[9]. Their main deficiency is that to avoid disastrous climatic and environmental effects, the Oxfordshire economy needs to change considerably. But the models tend to be based on a 'Business as usual' approach. Our climate and nature emergencies dictate that 'business as usual' is not a viable option.[10]

Some of our concerns are demonstrated in Figure 8.5.1. These are:

- Apparently, a short period of existing data (2010-18) is used to project far into the future (2020 to 2050). The models have a weak base and do not correct to allow for the impact of Covid in 2020-21 and possibly further on;

- The sudden spurt of growth predicted by the PWC 'Go for Growth' option around 2020 won't happen as 2020 and 2021 have been affected by Covid. In 2020 a dramatic downward turn in the economy occurred, followed by a recovery in 2021 that has yet to get back to where we were;

- Economies tend to fluctuate cyclically over time, not increase broadly in a more or less straight line for 30 years. History suggests fits and starts, ups and downs, occasional economic or other crises. Some crises have lasting effects, notably increased government debt – the Banking crisis and Covid for example. This is unlike the examples shown in Figure 8.5.1.

- The PwC forecasts end in 2040 and 'Go for Growth' is distinctly levelling off by then. So, PwC apparently expect little growth after 2040…

Figure 8.5.1 is copied in here for reference:

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[9] From Cambridge Economics (CE) and PricewaterhouseCoopers (PwC), Figure 8.5.1
[10] See 'Earth's tipping points could be imminent. We need a rethink', George Monbiot, Guardian 9 September 2021.

Figure 8.5.1: Employment (jobs) projections for Oxfordshire (2010=100)
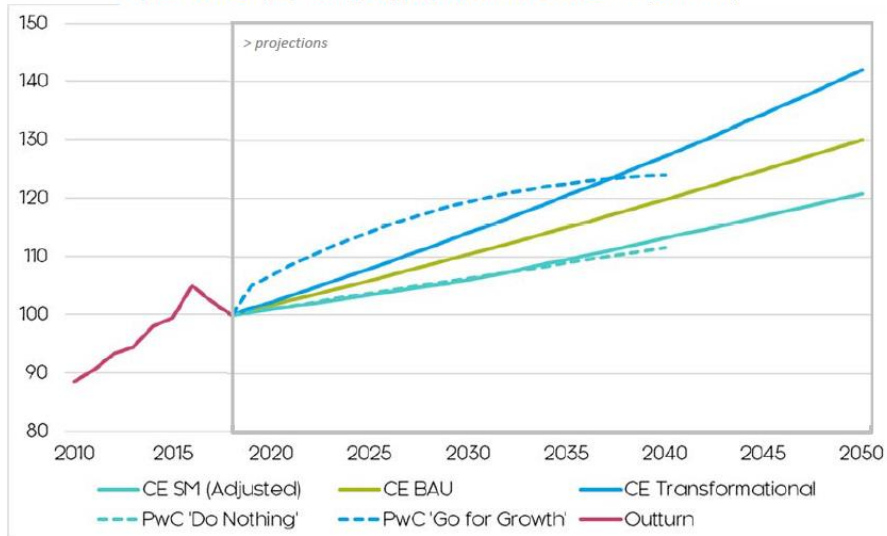
Source: ONS, Cambridge Econometrics, PwC.

Considering the three options that arise from the consideration of Oxfordshire's future economy:

1. **Standard - to meet the government target** – It is rather bizarre to assume that zoning land for housing growth at an arbitrary level set to meet a central government target will pull in jobs and migrants to create growth. Maybe the jobs will not arrive? Maybe the migrants will not arrive? Maybe all the houses will not be built? If growth does not materialise due to inactivity by developers, local councils will be blamed and penalised. Planning applications in even more unsuitable places will be allowed by the Minister, arbitrarily punishing local residents instead of those responsible.

And where do the migrants to fill the jobs and buy the expensive new houses, come from? Are other parts of the country planning to lose people to Oxfordshire? If they are not, then people moving here will undermine their targets. Or are other areas also assuming more in-migrants as well – where will they come from?

2. **Business as Usual – more growth** – This wording suggest that past trends will continue which, in Oxfordshire, allows for some growth. However, this option pushes growth to much more than that level. **It assumes that growth which has occurred for short periods recently will continue uninterrupted, for the next thirty years.** This is noted on page 103 of the Phase 1 report which says this scenario represents the:

   - *'extension of Oxfordshire's recent trend of accelerated growth'* and

- *'this trajectory represents a continuation of Oxfordshire's recent (pre-Covid) economic performance, taking particular account of the robust growth delivered during the recovery from the 2008-09 recession.'*

NNGO does not think that a short-term recovery from a recession should be the basis for a projection of continuing growth for the next thirty years.

We should not just consider the 'up' side of the Oxfordshire economy. Oxfordshire may have recovered well from a recession, but that does not mean that growth rate will continue. We know that the last two years have been fairly disastrous for the economy, with government borrowing funding people's wages so they can stay at home and avoid spreading Covid.

Oxfordshire may have more problems recovering from Covid than most areas. Our economy relies on international tourism, hospitality and entertainment and large numbers of students coming from abroad – all areas hit by Covid restrictions.

3. **Transformational – even more growth** – NNGO believes that it is extremely unlikely that growth on the scale envisaged by this option will continue at such a high level, for all of the thirty-year length of the plan period. Large amounts of infrastructure funding and thousands of people would have to be drawn into Oxfordshire, year after year. Our infrastructure would have to change radically - basically increasing everything, roads, water and power supply, internet, schools, hospitals, GP surgeries and so on by 50%. This could only be at the expense of other parts of the country that need to be 'levelled up'.

Growth on this scale would be 'transformational' but for who? NNGO suspects that the main beneficiaries would be property developers. Though we also think it is very risky for them. Having vast areas zoned for development means developers will not be sure that their investments and sites will be a success. This option may turn out to be transformational for property developers, but transformational in entirely the wrong direction!

Finally, is such rapid and continuing growth over half a lifetime in the interests of Oxfordshire's residents? Are we all clear what this might mean in terms of 50% more urban sprawl, traffic, air pollution, noise, pressure on already stretched public services including schools, hospitals, GPs & social care, loss of wildlife habitats, increased flood risks, constant disruption from building and the possible failure of infrastructure - water supplies, sewage systems and roads? How can we possibly accept all that and get to a zero-carbon economy?

Jobs and Commuting (Section 9.4)

Table 9.4.1 (page 116) gives the number of jobs projected for Oxfordshire in 2020 as 414,000. 'Double-jobbing' (one person having more than one job) is assumed to reduce the number of residents needed to fill these jobs by 4.5% to 395,000. Net commuters into Oxfordshire take a further 22,400 jobs, reducing the jobs for residents by a further 5.4% to 373,000.

The 'double-jobbing' percentage is not an issue, but the commuting assumption is more questionable.

Net commuting levels in the 2011 Census can be calculated from Table 9.3.1 to show net in-commuting of 9,277[11].

Figure 9.3.1 however shows more recent information from the 'Annual Population Survey' (APS). That survey is not likely to be as accurate as the 2011 Census data and NNGO is not convinced by it. When we tried to access this information, we were told by ONS that they have stopped publishing it because it is too unreliable because of the small sample sizes.

The figures show that more commuters come to work in Oxfordshire than leave. Considerable variation from year to year is shown, which may just be due to small sample sizes, but from around 2014/15, numbers increased to a net 2019 figure of around 21,000 (figure 9.3.1). NNGO considers that this final figure is a statistical aberration and no confidence should be based on it. NNGO also considers that is it not reasonable to say that there is a consistent upward trend in net commuting on the basis of figures that ONS now say are unreliable and no longer publish.

Generally, when figures show a rising trend for a year or two, as here, the consultant has been happy to project that forward to show continuing growth for the next 30 years or so…

In this case however, the opposite approach was followed. The effect of net in-commuting has been set to reduce jobs taken by Oxfordshire residents by 22,400 in 2020, but this is reduced to 13,800 in 2050. That is a reduction of 8,600[12], or 38%. This reduction has the effect of requiring more of the jobs in Oxfordshire to be taken by people who live in the County. Thus, this assumption adds thousands of houses to the numbers needed to be built in Oxfordshire.

NNGO considers that this addition is inaccurate and completely unacceptable. It is based on a single figure from a survey that ONS now say cannot produce accurate figures for net commuting. Net commuting is the difference between two large figures, both of which are prone to being inaccurate due to small sample sizes.

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[11] 9,277 = 57,447 in-commuters less 48,170 out-commuters
[12] This is based on the differences in the 'Standard Method' figures in Table 9.4.1. For example, in 2020 the commuting adjustment adds 22,377 to the number of jobs needed (22,377 = 395,341 − 372,964). The other options have slightly lower figures,

Even if the figure was accurate, and assuming that commuting into Oxfordshire has increased, NNGO disagrees with the decision to reduce in-commuting towards 2011 levels. That would imply that many people who currently commute into Oxfordshire will in future move into the County. Critically, that would free up housing outside Oxfordshire of course. However, there is no real evidence that this will happen. Commuters to Oxfordshire will have many reasons for not moving into Oxfordshire – attachments to their current community, residence or local facilities such as schools and maybe partners who work in the area where they live.

The 2021 Census data may allow us to sort out this issue. However, Journey to Work data tends to take some time to sort out, so that may not be available for some years.

10.2 Affordable housing

NNGO notes that:

- There has been a reduction in the social housing stock in Oxfordshire (Figure 10.2.1, almost a 2% cut from 2009-2018 – from 42,331 to 41,570). Waiting lists have inevitably built up (Table 10.3.1 shows almost 9,600 on waiting lists in 2019). This has been a direct result of central government policy for many years now. The approach combined limiting the construction of new social housing by local authorities coupled to a requirement to sell off housing to the occupants at a discount. These sales meant giving large subsidies to people who were already reasonably well housed. These policies need to change to increase affordability.

- NNGO considers that increasing pay rates by improving the quality and security of employment would be one way of increasing affordability. Recent economic growth has pushed up asset prices but real wages have stagnated. As a result, affordability problems were inevitable. Improvements could be made by reducing inequality through tax and benefit systems, reducing zero hours contracts and false self-employment – as one example, by requiring NI payments in these circumstances? Also increasing training, investment in more productive work and increasing minimum wages. Discouraging investment buyers of housing and second homes are other possibilities…

- NNGO also considers that progress will be simplified by reducing the vast windfall, unearned profits that are made when our society decides that development should be allowed on an open field (Green belt or not). Housing needs to become more of a service and much less of an investment opportunity.

- None of the above solutions require the proposed massive increases in house building in Oxfordshire.

- The consultant says that applying the 2019 NPPF guidelines[13], 3,200 affordable houses per year are needed until 2030 – so 32,000 homes in total. This is more than 3 times the 9,600 on the waiting list.

- 3.5% of households in Oxfordshire are on the Housing Register (Figure 10.3.1). That's about 10,100 households (out of 288,999). This is in line with the waiting list figure.

- The government's previous definition of needing 'affordable' accommodation would mean that the affordability figure was only around 1,700 (Table 10.4.1) instead of 3,200. But a massive change in the definition, which allows for the 'aspirations' of those who can afford to rent but can't afford to buy, has increased the need figure by 86%[14]. This is a considerable increase. 'Aspirations' are hard to measure and not all 'aspirations' are or can be met by our society. Also, these people would be leaving a rented property to move into one they wholly or partly owned. So, there would nearly always be another rented property released that would suit another household.

- The calculations to arrive at these 'affordable' figures are shown in Appendix C. NNGO has some concern about the overlaps between concealed households and overcrowding (page 176). The Appendix explains that calculation of the basic figure of 1,713pa (Section 4.7). NNGO has more concerns about the estimates of people who 'can afford to rent but can't afford to buy'. This adds 1,485pa (5.1) to the previous figure giving the total of 3,198. NNGO is concerned that this large allowance is made for people who are moving from one type of housing to another, rather than being 'new' demand. In moving out of one type of housing, that is freed up for other people to move in. NNGO also notes the comment that:

'at the time of writing, there is no guidance about how the number of such households should be measured.' (page 182)

So, the Consultant makes one up! One suspects that there is no government guidance on this issue because the government can't find data sets for all areas that convincingly demonstrate those with aspirations.

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[13] Households were considered to have an affordable housing need if they could not afford to rent or buy housing without support. The 2019 NPPF widened that definition to include households who **can afford** to rent a home but **aspire** to buy and need to support to do so.

[14] 86% = (3198 − 1714) / 1714

- Also, NNGO repeats our previous concerns that increasing the HRRs has in effect already allowed for affordability issues.

- Allowances for increasing the stock of affordable housing were made in all the existing Local Plans. These should feed new stock into the system until 2031 and onwards. It is not clear if that has included in these forecasts.

- The current options in the plan provide the following average numbers of houses per year:

Standard   3,386 pa[15]

Transformational   5,093 pa

Assuming even construction rates over the 30 years, up to 2030 anything between 95% and 63% of the new housing would have to be affordable to meet 'needs' of 3,200 per year. (page 124)

- If 40% of new builds are assumed to be affordable and 3,200 are required, then 8,000 new builds per year are needed. That is far more than the extremely high 5,093 figure in the 'Transformation' option.

- Table 10.5.1 shows the housing delivery in the districts over the last 16 years. Over 16 years, the total delivered in Oxfordshire is 10,870. That is an average of 629 per year – this is just under 20% of the required 3,200 target.

- Delivery has been between 23% (Vale) and 25% (South) of the total build (Table 10.5.1). In the most recent year, 2018/19 the percentages were higher, varying from 28% (South) to 34% (Cherwell) – with no figure for West Oxfordshire. From these figures, it is very clear that the existing housing system is not capable of delivering the proposed target.

- NNGO concludes that local initiatives, as described on pages 125 and 126 can help.

- However, NNGO considers that local authorities have been set an unachievable target for affordable homes. This is given their lack of power to change the balance of house prices to pay, or to fund and build the properties needed or to prevent their existing stock from being sold off. It is obvious that for these issues to be sorted out, Central government policies need to be extensively changed, as discussed above.

- **NNGO does not think that our only option is to build more expensive new houses and hope that a percentage of them will be affordable. A policy of 'more of the same' has not worked in the past – it made things worse**

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[15] 3386 = 101,580 / 30 and 5,093 = 152790 / 30

for years - and it will not work in future. Instead, many other things need to change!

Brexit (various)

The effects of Brexit (Sections 4.2, 5.2, 8.3, 8.5 and 12.7) are apparently included in the economic forecasts, but these are not shown so we cannot scrutinise them.

NNGO comments on the OGNA Phase 2 report

NNGO found the tables showing the effects of the different spatial options quite difficult to understand. Issues are:

- The FEMA (Functional Economic Market Areas) used run across district boundaries so are unfamiliar. And it is difficult to see how they will be split up to give figures for local plans. One example is 'Knowledge Spine South' which covers Wantage, Grove and Didcot – this runs across the boundary between South Oxfordshire and the Vale of White Horse. Another is the 'City fringe' area covering a ring all round Oxford, including Abingdon on Thames and Kidlington.

- Given that, if one is interested in a particular area, it is then quite difficult to follow that through the report. For example, to assemble the comments below, it is necessary to pull together information from six Tables - 4.4.1 to 4.4.6 on pages 47 to 52.

- This is important as the options vary the amounts allocated to particular FEMAs by huge amounts. Also, most people will be more interested in their immediate area than they are in the whole County

As a way of illustrating the issues, NNGO has looked in detail at just two of the FEMA areas:

Knowledge Spine South

This has 34,300 current homes and 15,500 (11.4%) of the total in the local plans. Options add homes as follows:

Option	Percent of total housing		
	Standard high method	Business but not **as usual**	Transform into urban area
Continued trends	7,500	13,100	20,500
Centralised	7,500	13,100	20,500
Evenly dispersed	3,900	6,800	10,700
Employment led	3,200	5,800	8,900
County focused	3,200	5,800	8,900

So that small area might end up with a quarter (25.4%) of all the extra housing supposedly required. Both the 'Continued trends' or 'Centralised' options, combined with the 'Transformational' option, will add 20,500 houses in the area.

This area is partly an AONB and there has been significant new development already delivered and more planned (for example 4,254 homes between the A34 and to the West of Great Western Park, Didcot application number P14/V2873/O). To this area, 20,000 houses will be added by 'Transformational'. This is only just less than the 20,560 required by the whole of the Vale Local Plan Part 1[16]. The A34 which runs through the area is an overcrowded road spine that will become completely overwhelmed. These options are, frankly, beyond belief.

City Fringe Area

This has 86,600 current homes and 14,500 (20.1%) of the total in the local plans.

Options add homes as follows:

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[16] http://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2019/07/LPP1-ch-1-4.pdf

Option	Percent of total housing		
	Standard high method	Business but not **as** usual	Transform into urban area
Employment led	12,100	20,100	32,200
Centralised	12,100	20,100	32,200
Evenly dispersed	8,000	13,900	21,800
Continued trends	5,200	9,000	14,100
County focused	5,200	9,000	14,100

So, this area may end up with up to 41% of all the extra housing supposedly required – if the Employment led or Centralised options are adopted.

Most of this would almost inevitably end up on the Oxford Green Belt, of which less and less will remain as considerable developments are already planned there (despite the promises to keep it). Restrictions on development in the area are considerable, from wooded hills to plains that flood. Traffic and congestion are already issues and massive infrastructure developments would be needed for development on that scale.

NNGO Alternative – The kind of economic growth we want

NNGO believes that people would prefer to have a greener Oxfordshire with less growth than any of the three options that the plan envisages. We definitely don't have to have shedloads of growth to make a greener and sustainable Oxfordshire. Having less growth imposed would make it easier to focus on the critically important 'green' objectives.

We are astonished to find a consultation document with no figures for population (or the proposed 50% growth rate) by the end of the plan period. NNGO estimates that the population of Oxfordshire will be over 1 million people if the 'Transformational' option is put in place and, unexpectedly happens. That would be 48% more people than in 2020.

We need economic growth that changes so it stays within our planetary boundaries. This will not be the same as the existing extract-process-use-dump one-way system, but cyclical, with less 'extract' and adding repair and recycle phases to make a circle, instead of 'dump'. NNGO does not know how this economy will develop but we do know that it will not be the same.

Recent economic trends have reduced job quality. For example, retail shopping has rapidly been replaced with online shopping which was needed during Covid. However, the online model does not necessarily bring better jobs. A combination of warehouse and delivery work results and both of these tend to provide low pay, low quality and insecure jobs. Also, the warehouse jobs are increasingly being replaced by automation.

We should not have the same economy in 2050. If we do there will be a climate disaster. So, we need a different economy. We invented the carbon-based economy in the Industrial Revolution, let's invent a Sustainable one! It's not yet clear how the Oxfordshire 2050 Plan will meet that need.

NNGO's general view of the OGNA is that it Is a mish-mash of assumptions from all sorts of sources – the out-of-date 2014 based figures, 2018 based figures, several other often over-optimistic sources, the Consultant's own dubious assumptions, and so forth. This apparently has just one aim in mind – to produce the highest possible housing growth figure for Oxfordshire. **It is a castle built on sand.**

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.

Planning for Real NEED not Speculator GREED in Oxfordshire

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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.