

Growth Targets Need Urgent Peer Review – Action Needed Now

There are just a few weeks remaining before the decision on future housing & population growth targets for Oxfordshire is taken*. After that, it will be virtually impossible to unpick.

Councillors will be aware how strongly the public feel about overdevelopment that does not meet local need but is damaging the environment and our climate. The Government appears to be getting the message, and it is time for Oxfordshire to stand up and be counted.

We urgently need your support and **action NOW** to call for an **independent peer review of the Oxfordshire Growth Needs Assessment (OGNA)**.

The OGNA underpins the growth targets set out in the Oxfordshire 2050 Plan. The tender document said it should be 'clear' and 'transparent' but it is unnecessarily complex and obscure. It is also deeply flawed. It differs from the Government's Standard Methodology and contains a variety of questionable assumptions all of which push growth figures upwards. The resulting housing figures are likely to mean that Oxfordshire will be a net carbon emitter every year up to 2050, wiping out any green benefits the Plan might otherwise contain.

A small amount of time and effort invested in a peer review now will save costly debate further down the line and help ensure we get only the development necessary to meet Oxfordshire's needs and wishes.

We ask all councillors to support our call for an independent peer review of the OGNA. We urge you to speak to your fellow councillors about the matter and encourage your leader to raise the issue via the Future Oxfordshire Partnership, or through other mechanisms that you consider appropriate.

A further short briefing follows below.

**The Oxfordshire 2050 Plan consultation document said decisions on growth would be taken in December. It did not make it clear who would take this decision or how it would be subject to public scrutiny.*

Oxfordshire 2050 Plan – Oxfordshire Growth Needs Assessment - Q & A

Q: What is the Oxfordshire Growth Needs Assessment?

The Oxfordshire Growth Needs Assessment (OGNA) is the key underlying evidence document that looks at the level of housing required in Oxfordshire. It is the basis for the three growth options set out in the Oxfordshire 2050 Plan consultation:

- Standard Method (Adjusted) 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 Office for National Statistics (ONS) household projections for Oxfordshire for 2050 are 53,000.

Q: What is wrong with the current OGNA?

The current OGNA is flawed because it uses a variety of questionable techniques to produce over-estimated population and household projections. This means that the baseline for all three of the options above is exaggerated and the final figures are inflated. For example:

- 76,000 people are added to ONS projections for Oxfordshire in 2050 (based on a dubious metric of patient registrations).
- The ONS household growth figures taper off dramatically in future decades, but no allowance is made for this.
- Inaccurate commuting data is used even though ONS no longer publishes this.
- It is based on a consistently buoyant economy for the next three decades and makes no allowance for alternative scenarios.
- The average net migration into Oxfordshire has been around 2,000pa. To reach the 'Transformational' option, this would need to increase to a staggering 11,000pa, which seems likely to outpace infrastructure and environment constraints and work to the detriment of the national levelling-up agenda.

Q: How does the OGNA relate to the Government's Standard Methodology for working out housing need? Won't we have to use that anyway?

We can see that it would be hard for local authorities to press for less than the Standard Methodology, although provision does exist within national planning policy to make this case 'if it is felt that circumstances warrant an alternative approach'. Our nature and climate emergencies, and Oxfordshire's past and current over-delivery against need, might indeed reflect such circumstances.

However, the OGNA doesn't use the Government's Standard Methodology, but an 'Adjusted' methodology. This in itself could cause problems later down the line at Inspection.

The 'Adjusted' methodology ups the baseline for all three growth scenarios and should therefore be subject to close scrutiny before pressing ahead.

Q: Why does it matter if the OGNA over-estimates the housing numbers?

The public has shown its clear concern about over-development at the ballot box.

Over-egging the figures leads to unreachable targets that can easily cause local authorities to lose their 5 Year Housing Land Supply and open the doors to speculative development.

Oxfordshire has already committed to delivering housing significantly above 'need' for 2011-2031 and we are seeing some of the costs in terms of loss of Green Belt and villages growing beyond recognition. Future development must be within our environmental and climate constraints.

Q: What is the remedy?

The first step would be an independent peer-review of the OGNA. This peer review need not be a costly exercise and could be completed in a few weeks. The cost benefit of avoiding lengthy arguments about the OGNA throughout the plan process would justify this expenditure and the time. There is no wish to delay the overall OP2050 timetable. Further actions would depend on the outcome of the review.

Calls for a review have already been made by NNGO, CPRE Oxfordshire, POETS, Oxford Friends of the Earth, Oxford Civic Society and others.

Q: What would an independent peer review deliver?

- A clear description of the methodology the OGNA consultants have used and how it differs from the Standard Methodology.
- An explanation of the main assumptions and how these impact on housing numbers, along with a comparison of alternative approaches.
- An assessment of whether the implied inward migration of people into the county is deliverable, particularly in relation to the broader levelling up agenda
- An overview of the spatial implications for the City and District Councils. For example:
 - on Oxford City's unmet need - which the District Councils will be expected to meet
 - the assumptions made about growth in locations where there is a high percentage of designated land such as Green Belt and AONBs
- Comment on specific criticisms of the OGNA such as those raised above.

Q: How could such a peer review be commissioned?

As far as we are aware, there is no formal mechanism for such a review, but neither is there any reason why it could not take place. Our assumption is that it would need to be endorsed by our local authority leaders, via the Future Oxfordshire Partnership. Councillors therefore need to encourage their leadership to take this step. Presumably individual councils could also pass motions supporting the principle of the idea.

Q: Why is this urgent? Shouldn't we just wait for the next round of consultation?

The OP2050 consultation document states that a decision will be taken on the level of housing in *December 2021*. That means action is now urgent. By the time of the next consultation, decisions on the level of development will have been locked in and will be much harder to unpick. (Meanwhile, it is not clear who is going to make this decision and on what basis, or if/how it will be scrutinised.)

Q: What can councillors do?

We ask all councillors to support our call for an independent peer review of the OGNA. We urge you to speak to your fellow councillors about the matter and encourage your leader to raise the issue via the Future Oxfordshire Partnership, or through other mechanisms that you consider appropriate.

Q: Where can I find further information?

Need not Greed Oxfordshire would be happy to answer questions and provide further briefings to individuals or groups of councillors as required. Meanwhile, there is a host of information on our website. <http://www.neednotgreedoxon.org.uk/resources/>