



Planning for Real **NEED** not Speculator **GREED** in Oxfordshire

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## **SOUTH & VALE LOCAL PLAN 2041 – ISSUES CONSULTATION – RESPONSE FROM NEED NOT GREED OXFORDSHIRE, JUNE 2022**

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together 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
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.

NNGO has taken an active interest in the Oxfordshire Growth Needs Assessment (OGNA) which we understand will ultimately give rise to the housing targets in the Oxfordshire Plan 2050. It is not yet clear how that will 'filter down' into housing targets in the City and Districts but we have been told that the decision on the number of houses to be built will be taken by the individual councils. We are therefore surprised that this Local Plan states on Page 81 that "the Oxfordshire Plan will set the future number of new homes to be built by 2050. The Joint Local Plan will only need to decide how and where our districts will deliver the homes". This oversimplification of the situation is inadequate and we feel that it is important that the mechanism for determining the housing targets is set out clearly. We also question whether it is actually possible to produce a Local Plan without knowing the underlying housing targets.

The OGNA has been heavily criticised by a number of high profile community groups. It has also been the subject of an independent review by an expert housing market assessment consultancy, Opinion Research Services (ORS). This independent review (See attached Summary, Para 1.20) states: "*The unjustified use of adjustments made to official projections and the Standard Method together with the lack of a conventional central economic forecast call into question the soundness of this document as supporting evidence for the development of the Oxfordshire Plan.*" It also criticises the OGNA on a number of other fronts including (Para 1.5) the OGNA's suggestion that the 2050 population of Oxford will be 35% higher for

Oxford when compared with the 2018 based ONS projections. A further criticism, relevant to South Oxfordshire, is that the distribution of the change within the other Districts is uneven with much more of it being in South Oxfordshire and Cherwell.

Given recent economic changes the following criticisms of the OGNA are also relevant:

Para 1.15: "The three reported employment scenarios have not sufficiently considered the impact of the pandemic, both on long-term job creation and also on the growing trend for working from home. In our opinion this is a serious omission which means that the number of dwellings required is over-stated."

Para 1.16: "None of the three alternative scenarios for future housing requirements is based on long term economic growth trends that incorporate the likelihood of periodic economic slowdowns or shocks, for example, Brexit, Covid and the current war in Europe".

The OGNA has a range of housing targets but nowhere is the assumed level of economic growth behind these clearly explained. NNGO wants the electorate to have a choice on the levels of growth but this is not possible if the growth needs assessment is incomprehensible and the electorate is not asked.

NNGO requests clarity in respect of:

1. How the housing target will be decided at an Oxfordshire Plan 2050 level and then at a City and District level.
2. The assumption on levels of economic growth behind the housing targets.
3. How the electorate will be given a choice on the level of economic growth and the housing targets.

We understand that the OGNA is likely to be updated but feel that as a basis for determining housing targets it is entirely unsatisfactory and a replacement assessment is required.

Housing targets are of fundamental importance to the plan because there is a direct conflict between environmental ambitions, climate change targets and our ability to achieve food, energy and water security.



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