



October 2022

By email to: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

## **OXFORD LOCAL PLAN 2040 – PREFERRED OPTIONS CONSULTATION – RESPONSE FROM NEED NOT GREED OXFORDSHIRE, OCTOBER 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.

### **ABOUT THIS CONSULTATION**

1. We question whether this consultation is fit for purpose. **A Local Plan's fundamental objective is to set out the quantity and spatial distribution of proposed development – this Preferred Options consultation is completely opaque on both these issues.**
  - The level of proposed housing is not clearly identified – there are strong indications that the Council wishes to pursue a level significantly above standard methodology but this is postponed to a future consultation
  - The spatial distribution is not identified – there are a list of sites but it is not clear which sites are already allocated (in the Adopted Local Plan 2036) and which are new, nor is there any clear indication of the amount of housing that is proposed to be accommodated on the sites.

Without this basic information, it is virtually impossible for local residents to make informed comment on the options outlined. We consider this to be an unacceptable failure of process.

2. **There has been a failure to take into account the responses from the earlier Options consultation.** We note that neither the City Council's Scrutiny Committee nor Cabinet meetings in September 2022 reviewed the consultation report before the Preferred Options document was authorised for publication (even though the consultation report itself is dated April 2022).

We note that over 80% of respondents identified *safeguarding the natural environment and its wildlife habitat* and *preserving open spaces* as 'very important'. As a comparison, only 18% of respondents identified *more housing in the City* as 'very important', although this rises to 56% for *more truly affordable housing in the City*.

It is completely unclear how these priorities, as expressed by local residents, have been taken into account in the preparation of the Preferred Options. For example, the introductory paragraph 0.1.1 states: "The delivery of new homes continues to be a priority for this plan, whilst ensuring that we deliver and support mixed and inclusive economic development across the city." There is no mention at all of the natural environment, wildlife or open spaces.

There is no point in the City Council consulting and then failing to take into account the feedback that it receives. Indeed to do so is wholly disrespectful to those who have taken the time to respond. This, in conjunction with a failure to put the consultation report from the earlier Options Consultation in front of either the Scrutiny Committee or the Cabinet, is an unacceptable failure of process.

## **OVERVIEW RESPONSE**

There appear to be two competing visions for Oxford City.

### *Vision 1 - Grow and expand*

This is being driven by the City Council and Oxford University Colleges to attract thousands more people into the area - significantly increasing housing beyond the existing boundary, elevating house prices even further, replacing countryside and biodiversity with concrete and providing a huge financial windfall to landowners (who in many cases are likely to be the Colleges). The Council have been following this trajectory for some time and if it continues will likely see Oxford in the coming decades become an urban sprawl connecting up with Witney, Bicester, Kidlington, Thame and Abingdon. This approach is the complete opposite of what is required to address the climate, biodiversity and health emergencies and long-standing wealth inequalities.

### *Vision 2 - Prosperity with less expansive growth*

An alternative vision, supported by the majority of the electorate in the districts, is to ensure we maintain full employment for people who already live in Oxford and Oxfordshire whilst preserving as much countryside as possible by only building those homes and new business premises that really need to be there and ensuring the supporting infrastructure, from transport to sewage, is put in place to cope with limited growth.

NNGO believes there are three pressing exceptional circumstances that support this latter vision:

### 1. Our climate and nature emergencies

The City Council recognised the climate emergency in 2019 and reaffirmed its commitment to addressing the ecological emergency as recently as its meeting in October 2022.

### 2. Unaffordable housing

Oxford City house prices are some of the highest in the country outside of London and way beyond the wages of ordinary working people. This has resulted in buy to let, Airbnb and global foreign investment driving an overwrought rental market which has priced out our young people and key workers from home ownership. **There is no evidence that simply building more houses on the existing market model will reduce the prices.** Oxford needs council houses – these should be built without further delay rather than prioritising sites for further employment or market priced homes.

### 3. UK's need for Levelling Up

There is an acute need for jobs to be created in poorer areas of the UK, where people already live. Our world-famous University should be using its finest minds to figure out how the investment opportunities that exist for an expanded Oxford City can be realised in areas further afield. If Nissan can manage its R&D from Japan with manufacturing in the UK, it is surely possible to do the same and for Oxford University in conjunction with local authorities to spearhead economic growth in those regions of the UK that desperately need it. There is no need in this technological and IT connected country for the spin off industries from Oxford University to be located anywhere near the universities.

We urge Oxford City Council to prioritise these issues as it takes forward consideration of its housing need and requirement, and other Local Plan options.

## **SPECIFIC POLICY RESPONSES**

### **Strategic Policy Option Set S2: Approach to greenfield sites**

**No further review of the Oxford Green Belt is required at this stage.**

Significant development, including housing numbers equivalent to a one third increase in the City, have been allocated within the Oxford Green Belt in just the last few years. Further allocations would undermine the openness and permanence of the Green Belt and a Review would therefore be inappropriate and an unnecessary cost to taxpayers.

### **Policy Option Set H1: Housing Requirement**

**The options presented are flawed. A further option should be included that allows the public to express a view on setting the housing requirement at a lower figure, taking into account the over-delivery intended up to 2031, the requirements of our climate and nature emergencies and the constraints on delivery within the City.**

The City's desire to pursue a growth agenda should be constrained to that for which the associated housing is deliverable within its own boundaries. Surrounding Districts have already allocated sites for 15,000 houses for Oxford's needs, to the detriment of the Oxford Green Belt and putting enormous pressure on transport and other infrastructure and services. Further allocations within the lifetime of this Plan would not be compatible with delivering sustainable communities.

### **Policy Option Set H2: Housing need for the plan period**

The housing figures should be set at the minimum that it is possible to achieve whilst meeting genuine need. Exceptional circumstances (eg the climate, biodiversity and health emergencies, democratic wishes of districts, truly affordable homes, UK's urgent need for Levelling Up, the constraints of flood plain and Green Belt, the over-delivery in relation to need already accommodated within the Oxfordshire Housing & Growth Deal) are all logical reasons for a housing figure that is below that produced by the Standard Methodology.

Housing figures above those produced by the Standard Methodology cannot be justified because of the overriding importance of our climate and nature emergencies and the constraints on delivery within the City.

It should be noted that the City has been quick to suggest that exceptional circumstances might justify higher than Standard method numbers - but ignore the

fact that there are exceptional circumstances which might sensibly justify **lower** figures in Oxford's case.

**An Option C -an alternative lower assessment - must also be considered when arriving at the Housing Requirement figure (see above).**

The Oxfordshire Local Industrial Strategy – quoted in defence of higher economic growth based figures – should carry little weight as it was not subject to public consultation or local authority scrutiny, but was signed off by the unelected Oxfordshire Local Enterprise Partnership. The document predates Brexit, the Covid Pandemic and the current economic challenges. Its wildly optimistic vision of economic growth was always doubtful and now even more so, and it should not be considered as an appropriate or up to date evidence base for decision-making.

It is entirely right that housing provision should address genuine need. The 2018 update on the Oxfordshire Strategic Housing Market Assessment, commissioned by the City Council, identified the actual level of need as **554 homes per annum**.

There is more than enough housing in central Oxfordshire already allocated in the last tranche of Local Plans to meet this figure – the real issue is securing provision of social and **properly** affordable housing.

*Note on evidence base & consultants*

The City Council has said it will commission a new piece of work to establish housing need. Previously, this was being worked on through the Oxfordshire 2050 Plan process (now abandoned) via the Oxfordshire Growth Needs Assessment (OGNA). The OGNA was a deeply flawed document that was widely criticised by a large number of civic and amenity groups, including Need not Greed Oxfordshire, the Oxford Civic Society, CPRE Oxfordshire, Friends of the Earth and others. In particular, we draw attention to the report by independent consultancy Opinion Research Services, commissioned by NNGO member Cherwell Development Watch Alliance, that criticised the methodologies used for calculating population and employment growth in the county, and more especially in the city of Oxford itself.

Its conclusion was that: *“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.”*

We would therefore like reassurance from the City Council that:

- a) It will not be using the same consultants that prepared the OGNA to produce the updated evidence for the Oxford 2040 Plan.
- b) Any consultants that are used are demonstrably independent and not reliant on the development sector for the majority of their income.

- c) The brief for consultants should include consideration of the case for pursuing a figure below that generated from the standard methodology.

Ian Ashley  
On behalf of the Coalition



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

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