Oxford Local Plan 2040 –

Housing Needs - Reg. 18 Part 2 Consultation

Consultation Response by Planning Oxfordshire's Environment and Transport Sustainably (POETS)

March 2023

POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

For more information go to *www.poetsplanningoxon.uk*

Oxford Local Plan 2040 – Housing Needs Consultation

Key Finding

1. Once again POETS have strong misgivings about forecasts for growth. Although this consultation is from the city council it has major implications for the whole of Oxfordshire over the coming decades.

Two General Concerns

2. It is disappointing that the recent Housing and Economic Needs Assessment (HENA) has been prepared by the same consultants used for the generally discredited Oxfordshire Growth Needs Assessment (OGNA) to 2050. The consultants are not demonstrably independent and are reliant on the development sector for most of their income. POETS previously asked that the assessment to 2050 should be peer-reviewed by a panel of independent experts. Regrettably this has not been done – and this further undermines the confidence that can be placed on the high levels of growth that are forecast.
3. POETS are very concerned that Oxford city and Cherwell district councils have published forecasts for the whole county and apportioned growth between the five districts – effectively attempting to cast themselves in the role of strategic planning authority. We believe that the other three local planning authorities withdrew from the joint strategic plan for Oxfordshire to 2050 due to disagreements over how the OGNA should be taken forward. The publication of the HENA in its current form does not bode well for cooperation between all the districts and it should not be used to pre-empt the decisions that will have to be made by the councils who have not signed up to the report.

Growth Scenarios

4. We strongly disagree with the three scenarios resulting in the highest growth rates and consider they should be discounted as the basis for planning Oxfordshire's future. The two employment led scenarios would lead to housing need projections over the next ten years 50% and nearly 100% higher than achieved over the last ten years. The census adjusted scenario, based on preliminary and incomplete data, inflates projections of housing need to over 60% above the household increase 2011-2021. It is unsound and the scenario should be discounted.
5. The high rates of population growth in these scenarios are unrealistic, unsustainable and undesirable. They rely on increased rates of household formation - unlikely given worsening conditions in the jobs market with stagnant wages, insecurity, low pay, zero hours contracts and low-quality self-employment. Added to this are rising mortgage rates and high house prices fuelling the cost-of-living crisis. These will all dampen demand for new homes and in the economy generally. In any event, they would require high rates of net migration into the county over the next 20 years. The UK now has a restrictive immigration policy and free movement from the EU has ceased. Significant population movement into Oxfordshire from other parts of the UK would defeat the government's levelling up agenda and deplete the less economically buoyant areas further.

6. POETS recognise that Oxfordshire has a global reputation for learning, research and innovation, and must contribute to the success of the national economy by playing to its strengths. But we do not accept this means significant old-style economic growth requiring ever-more land and people, particularly given the overriding importance that should be attached to the climate and biodiversity emergencies, problems of water supply and sewage disposal, and the need to level up opportunities within the UK. There are also huge uncertainties resulting from the loss of free trade with Europe, cut-backs in public investment and a potential world economic recession. The prospects for Britain's economy are much poorer now than a few years ago. Further cuts in public spending will make it even more difficult for local authorities to maintain existing infrastructure and services, let alone provide new facilities and homes for a substantially increased population.
7. There is already evidence that people are finding it difficult to find GPs and school places near to where they live; traffic congestion is increasing; and roads are deteriorating. This is reducing the quality of life for people living and working here and will ultimately make Oxfordshire less attractive for business investment. Furthermore, ambitions to grow Oxfordshire's economy and population significantly would harm the environment and character of the county, require major releases of greenfield land and investment in infrastructure, worsen traffic congestion and CO_2 emissions through even higher levels of commuting, further stress the water cycle, and require the excavation of many millions more tonnes of sand and gravel from the river valleys and limestone from the Cotswolds. Ironically it is only the city council which would not have to face the difficulties of accommodating the high levels of growth that the consultants are favouring.
8. The fourth scenario based on the standard method includes a very high uplift of over 40% for affordable housing resulting in household growth some 16% above the increase in 2011-2021. Contrary to popular belief, building more homes will not reduce house prices, and it is a very blunt instrument for securing genuinely affordable homes. The city council's annual monitoring reports indicate that of the homes built in Oxford 2016 – 2021 less than 15% were 'affordable' - even by the government's definition (80% of market prices or rents) which in reality is not affordable in Oxfordshire by those on even average incomes. Although we have misgivings about this scenario it is consistent with current government policy. More genuinely affordable housing could be built if the government committed to investing in it; this would make sound economic and social sense and enable more homes to be built for people living and working here. POETS consider there is no need to provide more homes in Oxfordshire than required by the standard method.
9. POETS agree there are acute housing pressures in the city, and we are very concerned that the city council is only proposing to provide for 457 homes a year within Oxford – this is only 85% of the rate achieved over the five years to 2021. The housing shortages in the city are due in part to the city council's continued promotion of employment growth; this despite the historic imbalance between jobs and economically active residents. Instead of seeking 'overspill' housing outside its boundary which will increase pollution and militate against carbon reduction, the city council should be actively maximising the delivery of housing within its boundaries. This could involve promoting the redevelopment of all or part of employment sites for housing and enabling the high-quality conversion of under-used office and retail space for housing. The use of vacant sites should be prioritised for affordable housing. Given the increasing number of elderly home-owning residents, the provision of high-density, high-quality apartments could free up under-occupied family homes. All these could reduce commuting into the city and help tackle climate change. This need not reduce the vitality of the city especially if the remaining employment sites are managed effectively.

Conclusions

10. POETS urge the city council to

a) accept it is inappropriate to use the consultant's report to pre-empt decisions that are more appropriately made by the other district councils in Oxfordshire on the amount of housing to be provided in their areas;

b) reject the three scenarios requiring substantially increased levels of housing growth as they are unrealistic, unsustainable and undesirable for the reasons given in paragraphs 4-9 above. As a maximum, growth in Oxfordshire should be no higher than the consultants' forecast using the government's standard method, which is 16% higher than past rates;

c) plan for more housing in the city than indicated by the current consultation. These three factors might enable the district councils to work together cooperatively and allow all the local plans to be produced more speedily. The county of Oxfordshire functions as a city region; it should be planned as such and not in a piecemeal way;

d) move away from an old-fashioned pursuit of GDP 'growth' to the more socially and environmentally aware 'doughnut economics', which aims to ensure that no one lacks life's essentials (food, shelter, healthcare) and that development does not compromise the planet's ability to support life. This approach, developed by Oxford academic Kate Raworth, is being pursued by other cities around the world; Oxford should follow suit.