

## **Oxford Local Plan 2040 Examination – Matter 3 Housing Need and the Housing requirement – Need Not Greed comments**

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across Oxfordshire, 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.

Our Respondent number is **35**.

The local elections on 7 May have changed the political situation in Cherwell. The Liberal Democrats are now the largest party and have 17 of the 48 seats, but that is not enough to take overall control of the Council. Cherwell is likely to reconsider their attitude to the HENA and the Oxford plan.

In our response to the Reg 19 Consultation, we concluded that the submission draft was not positively prepared, not justified, not effective and not consistent with national policy.

We now consider that Cherwell and Oxford City have not complied with the duty to cooperate. This should halt the EIP<sup>1</sup>.

### **Issue**

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

### **Questions**

#### ***The HENA and housing need***

#### **1. Why does the HENA seek to assess the housing need for Oxfordshire and all of the individual authorities? Is this justified?**

NO – Oxford and Cherwell have pre-emptively combined, disregarding the views of three districts. This is not 'cooperation'. Oxford seeks to impose their high figures on the local development plans of the other districts. This dictatorial approach is quite wrong and it has quite rightly been rejected by the other districts. If it stands, it would allow any other district in England to link up with any neighbours, produce figures they accepted and then push them on others. This is a terrible precedent. It would spread dissent across the country. It should be rejected by the Inspector. The local democratic rights for all districts and cities to make decisions and plans for their area should be supported.

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<sup>1</sup> It is clear from the Inspector's Guidance Notes (2.7b and 2.8) that the City has not complied with the duty to cooperate.

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### **2. How does the HENA arrive at the four scenarios for housing need? What evidence sources and assumptions are used? Are these appropriate and justified?**

NO – Oxford should broadly:

- Accept the limitations on building housing in the City as a constraint on development;
- Consider building high quality, higher density housing; and
- Avoid developing more land for jobs in Oxford as this will increase in-commuting.

Focusing on developing jobs in Oxford will increase commuting and increase existing congestion. Concern has been expressed recently about the effects of 2,200 more commuters to the life sciences area 'Oxford North'<sup>2</sup>. More of the land zoned for employment purposes should be zoned for housing.

A detailed analysis of why the previous plans have failed to deliver homes in sufficient numbers that key workers can afford would have been a good starting place.

#### **A wider view of economics**

NNGO believes that a wider view of economic change and development should be taken.

Many cities and countries around the world are recognising that giving primacy to economic growth, as this plan is doing, is not sustainable. It has damaged the natural world and the wellbeing of citizens and is a key driver of the climate and ecological emergencies. One alternative approach, is outlined by economist Kate Raworth in Doughnut Economics, balancing economic, environmental and societal requirements of sustainability.

If an approach based on Doughnut Economics and consistent with UK Levelling Up and Net Zero 2050 is adopted, we expect that the Plan would change considerably. Additional insights would be gained around impacts on the environment and societal wellbeing. This may necessitate a new Regulation 18 process.

#### **Our criticisms of the HENA**

We have produced a 25-page comprehensive criticism of the Cherwell and Oxford Housing and Economic Needs Assessment (HENA). A copy is included with our response for information. It has a two-page summary at the start. Our main areas of concern are still that:

- The HENA was only supported by Cherwell and Oxford but included figures for other districts;
- It was produced when only some 2021 Census data was available. (Even now, revised population and household projections produced by ONS and based on the 2021 Census are not available);
- Household representative rates are the rates that the population forms households. It was assumed that the rates would increase for people aged 25-34 if more new houses were built. We consider that other factors would have to change to achieve that. In particular the jobs market, where there are stagnant wages, insecurity, low

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<sup>2</sup> Oxford Times, front page. 16 May 2024. [https://www.oxfordmail.co.uk/news/24320427\\_gridlock-fears-overbearing-science-district-oxford/](https://www.oxfordmail.co.uk/news/24320427_gridlock-fears-overbearing-science-district-oxford/)

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pay, zero hours contracts and low-quality self-employment. They don't provide the stable and higher income jobs needed to fund house purchase;

- House prices were being pushed up by low interest rates and government schemes such as 'help to buy' or stamp duty holidays. In these cases, sellers were aware that buyers were being subsidised by the government and the sellers pushed up prices to mop up the benefits; and
- Net migration over the last ten years was lower than the last five years, that the HENA relied on.

More details of these points and many others are in our 25-page report...

### Oxford should consider other options with lower housing growth rates

We have two examples that reduce the HENA growth figures;

1. The net migration figure per year is based on the last five years. But, when predicting twenty years into the future, using the last ten years seems more likely to give a firmer and more realistic estimate. The five-year average figure used is 5,426 per year, so **54,256** over ten years. The ten-year average is 4,961 per year, so **49,606** over ten years - **4,650** fewer. This allows for growth identified by the 2021 Census. Total population increase over the ten years from 2011 is **71,936**<sup>3</sup>. So, having 4,650 fewer net migrants would reduce growth by **6.5%**.
2. We should also allow for the fact that the 2014 ONS household projections of growth taper off over time. The HENA wrongly assumes that the increase in household numbers in the first decade will continue in the second decade of the plan. The HENA assumes growth of 37,301 in the first decade and the same again in the second - a total of **74,602**. In fact, growth in the second decade is just 21,834. So, the ONS total growth over 20 years is actually **59,135**. Using the ONS figures, household growth over 20 years should be **20.7%** lower than the HENA figure.

Details are in Annex A.

**In total therefore these two changes could generate a reduction approaching 30% in the growth figures. Just making the second change reduces growth by over 20%.**

### Do many large-scale development opportunities exist?

In Oxford, sites at Oxpens and Osney Mead could have been used for more housing.

Outside the City, there are few large site options near to Oxford. The more obvious large sites have been included in previous plans so are not available. One example is Abingdon Airfield/Dalton barracks which can only be made available by the Ministry of Defence. That is not in a good location, being separated from the town by the A34. It is ringed by secondary roads. If it houses people who work in Oxford, this will push more traffic onto the A34, which is already inadequate and is blocked for long periods by even a minor incident.

Nearly 20,000 houses are already planned, but not yet delivered, on Green Belt released in the last round of local plans. There is no mention of this.

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<sup>3</sup> 71,936 = 726,727 – 654,791 Pop growth in Oxfordshire 2012 to 2022 note Table 7

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What remains is not the ‘Grey Belt’ of ‘poor quality wasteland and disused car parks’, which the Labour party says could be built on<sup>4</sup>. It is Green Belt, providing the internationally known ‘dreaming spires’ setting of the City. It provides a nearby green environment for City dwellers. It was providing green gaps between the City and surrounding settlements, notably Kidlington and Begbroke. It has ‘genuine nature spots’. It is Port Meadow, Wytham Woods, Bagley Wood and Shotover Country Park. It can be even more likely to flood due to climate change. Crops are grown on it....

Labour’s target is to build 1.5 million new homes in five years – that is 300,000 per year, the same as the existing standard method total. These should be spread across the whole country, not shoe-horned into Oxfordshire.

### 3. What is the basis for choosing the CE Baseline scenario and departing from the standard method scenario? Is this justified?

NO – Oxford should not depart from the standard method. We understand that South Oxfordshire and the Vale of White Horse District Councils are using the standard method in their emerging local plan.

The standard method, set by the government to meet its housing target across the country is 762 dwellings per year for Oxford (HENA 7.2.6). This includes a substantial allowance to build extra properties to help reduce local affordability problems. Instead of that figure, Oxford proposes a figure of 1,322 (HENA 10.11.5). This is 560 per year or **73%** more than the government’s figure.

Going so far above the target implies that Oxford will pull in skilled people and development from other parts of the country. There will be no ‘levelling up’ and the country will remain unequally developed, with most areas lagging behind. Overall, the national economy will be weaker with a few busy areas but with most regions languishing.

#### Infrastructure problems

Oxfordshire’s underlying infrastructure is inadequate, underfunded and under pressure. Key roads (A34, A40, M40) are busy, often overcrowded and easily blocked. Minor incidents often lead to serious congestion. Rivers are polluted, floods more frequent. The increasing need for the economy, heating and transport to be based on electricity will require new developments to reach our net zero plans.

Thames Water, responsible for water supply and sewage treatment has conspicuously failed and is on the edge of bankruptcy<sup>5</sup>. It will leave vast debts behind – debts that funded payments to shareholders in the past, rather than improvements or repairs. Wetter winters and hotter summers due to climate change add to the pressure. Improvements are needed to cope with existing developments and new development that is already in the pipeline. Where will extra water for huge new developments come from? Where will the additional sewage go? – the Thames!

As an example, the Infrastructure Development Plan, September 2023 says that:

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<sup>4</sup> <https://labour.org.uk/updates/stories/labours-housing-plan-how-well-protect-our-natural-spaces-and-free-up-grey-belt-land-for-building/>

<sup>5</sup> Thames Water’s largest investor a Canadian pension fund who owns 31.7% of the shares has issued a ‘full write down’ as it believes its share is worth nothing.

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*‘Thames Water have indicated that the scale of development across the local catchment (which extends beyond the city boundary) is likely to require upgrades to water supply and sewerage networks. Thames Water have also confirmed that funding is available for the delivery of a major increase in treatment capacity at the Sandford Wastewater Treatment Works (WWTW).’*

Their stormwater discharge site <https://www.thameswater.co.uk/edm-map>, shows details of Oxford/Sandford’s regular discharges of raw sewage into the Thames, saying:

*‘We’re finalising plans for a major upgrade at Oxford STW, costing more than £130m...’*

We are not convinced. We have an Environment Agency letter dated 15 February 2024 to SODC asking them to refuse permission to build up to 1,450 new dwellings and other facilities ‘North Of Bayswater Brook Near Barton’. Their objections are due to flood risk and foul waste problems. They say that:

*‘The proposed development would pose an unacceptable risk of pollution to surface water quality’. Also ‘Oxford Sewage Treatment Works is a site of significant concern for the Environment Agency.’*

They go on to explain this in detail. So, the proposed development should not be given permission. Schemes to improve the STW were:

*‘to be delivered March 2025, however the EA understands this has been delayed by several years.’*

Thames Water are in dire self-inflicted financial difficulties. They have a record of letting pollution get worse, then asking for huge increases in water bills to fund any improvements - which they should have provided in the past. They should now focus on sorting out the existing problems for their existing customers. We are sceptical about their ability to cope with further large-scale developments.

New developments should not be allowed unless it very clear is clear that no additional sewage will go into the Thames. We used to be proud of the improving water quality of our rivers – but no more!

#### **4. What is the basis for choosing the apportionment between authorities based on the distribution of forecast jobs? Is this justified?**

If, most unfairly and unfortunately, three districts are forced to take on the excessive extra housing proposed by Oxford and Cherwell, they should be able decide how to share out the pain. This would at least preserve the last vestiges of democracy and independence.

#### **5. What are the objectives of identifying a housing need of 1,322 homes per annum (26,440 over the plan period) for Oxford City and what are the intended outcomes?**

We would say that the objective is to thoughtlessly keep pushing hard on the existing economic model to expand the economy, with little regard for the environment and the on-growing climate change catastrophe. All the time, the climate worsens, with temperature records being broken, more storms and flooding. Out of 380 climate scientists 80% forecast

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disastrous temperature rise of at least 2.5C<sup>6</sup>. This approach is being force-fed to Oxford's neighbours who have already provided thousands of sites for housing development for the City and who are now being asked for more... Instead, we should identify and plan to get back into our local and planetary boundaries.

### 6. How has the capacity to accommodate housing within Oxford City been assessed? Has the process been sufficiently thorough and robust? Could the capacity estimate be increased by altering assumptions or policy approaches? If so, what effect would this have?

As noted earlier we think Oxford should reconsider, allowing more housing developments instead of industry and cut back their proposals for growth outside the City. Density could be increased with careful planning. We believe that the HENA figures are just too high.

### 7. Is it appropriate to set the housing requirement to exactly match the identified capacity (notwithstanding the use of some discounting)? What implications would this have for future assessments of housing land supply? Should more flexibility be built in between the requirement and the estimate of capacity?

We do not think that the huge increase in the housing requirement is needed. There is no clear justification for going beyond the standard method.

### 8. How and where is it intended to meet the unmet need of 841 homes per annum (16,828 over the plan period)?

Figures from page 30 of the plan produce the following table:

	Per year	Over 20 years
Need	1,322	26,440
Capacity of Oxford	-481	-9,612
Unmet need	841	16,828

Thus, Oxford says it can only provide housing land for 36% of its needs (9,612 / 26,440). The other 16,828 homes would be imposed on the other four districts.

As an example, the North Abingdon site will provide around 1,000 homes and it is about a mile across. It covers 50.65 Hectares. So, Oxford's unmet need is equivalent to 17 sites of a similar size. They might need 852 Hectares (16.828 x 50.65). 852 Hectares is 8.5 square Kilometres. This is about the size of Abingdon (9 square Kilometres).

The Northern Gateway site on the edge of Oxford (page 167 of the plan) is 45.2 Hectares. So, the 852 Hectares is also around 19 times the area of the Northern Gateway site.

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<sup>6</sup> Guardian 9 May 2024

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Oxford's need is exaggerated. Oxford then plans to dump 64% of its supposed need onto its neighbours.

### **9. What agreements are in place to do this and what is the position of other authorities, including in relation to continuing commitments in existing adopted Local Plans?**

There are no such agreements in place outside Cherwell, as far as we know. Local elections may change the views in Cherwell. Trying to force the other three districts into line with the plans may not work so could backfire. Most areas outside Oxford have already seen enough development, have a lot more in the pipeline and can point to problems like lack of necessary extra infrastructure - notably transport improvements, doctors, dentists and so forth – as well as many other services, which have been degraded in recent years.

### **10. How do housing requirements in adopted Local Plans in other authorities compare with standard method calculations of housing need?**

We understand that South Oxfordshire and the Vale of White Horse are basing their plans on the figures set by the government's standard method. Areas outside Oxfordshire may have districts seeking to impose additional large-scale growth on their neighbours. If this behaviour was encouraged it could grow and spread to more authorities, increasing disputes and tension.

### **11. Will the full unmet need realistically be delivered by other authorities?**

We believe the figures are excessive. Building lots of new houses that are more expensive than the existing stock will not reduce prices and will not make Oxford housing more affordable.

Builders normally buy land that is priced considering the price of nearby houses. Very large Windfall profits are normally made by the land owners. Then the builders do not build any houses unless they think they can sell at the higher prices.

Allowing this approach over many, many years has not improved affordability – it has made it worse. We don't think that has been the only factor at work. Low interest rates for years have contributed to pushing up property prices and making housing an investment rather than the service it should be. Policies like 'right to buy' have undermined the public housing sector – giving large sums to people who are already adequately housed. Housing that was in the public sector and affordable is often now rented out at higher prices by private landlords.

Poor quality jobs have also made it far more difficult for people to buy a home. Low pay, so-called 'self-employment' and zero hours contracts have all added to the problems. It will be difficult to stop poorly paid and patchy employment, such as the van/cycle delivery system. Failure to increase tenant's rights and prevent no fault evictions from rented property is also a factor. All these factors should be addressed if home ownership is to become more affordable and widespread.

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### **12. What are the implications for emerging Local Plans in these authorities?**

For the other three districts in Oxfordshire, the unwelcome plans of Oxford and Cherwell are a threat to their environment and independence. These plans could set a terrible precedent outside Oxfordshire. Our three districts have no requirement to build more than the government targets, but are threatened with having to zone much more land (where?), which will probably fester in a land bank for years, making it far more difficult to prove that they are meeting any targets and have a 'five-year land supply'.

### **13. How would delivering unmet need in other authorities achieve the objectives and outcomes intended, for example in terms of commuting and addressing affordable housing needs in Oxford City?**

We don't think it will! Will an expensive new house in the Vale, some way from Oxford, help affordability in Oxford? Will more commuting improve the lives of Oxfordshire residents?

### **14. If Oxford City's housing need was calculated using the standard method, what would be the implications for the scale of unmet need and the potential for it to be met by other authorities?**

We do not think there is as much unmet need as claimed. Accepting this would lead to a greener and more attractive Oxfordshire.

We are deeply concerned about the climate crisis (declared but rather ignored by the City). Dealing with this should underlie everything in the Local Plan. Currently suggested levels of growth, perversely, will make it virtually impossible to meet carbon targets for the County. Recent calculations suggest that a 3C rise – would lead to *'precipitous declines in output, capital and consumption that exceed 50% by 2100'*.<sup>7</sup>

### **Word Count**

**This document has 2,991 words, EXCLUDING the 409 words in the original questions. The questions have been kept in for clarity,**

**We have three supporting documents in case further evidence is needed:**

- **Annex A – calculating our alternative options for the HENA**
- **NNGO Notes on Housing and Economic Needs Assessment for Cherwell and Oxford**
- **Letter dated 15 February 2024, from the Environment Agency to South Oxfordshire District Council**

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<sup>7</sup> Bilal and Kanzig, reported in the Guardian 18 May 2024.



# **NNGO Notes on Housing and Economic Needs Assessment for Cherwell and Oxford**

## **General points**

Cherwell and Oxford say (para 4.19 of the draft LP):

*"This approach does not seek to impose an approach on other Oxfordshire authorities, it is for the other authorities to identify an appropriate housing requirement for their own areas and to identify an appropriate contribution for contributing towards Oxford's unmet need."*

Cherwell and Oxford have decided to commission this report. Accepting or rejecting this report is their decision.

The report is written 'as if' it is a report agreed by two districts that applies to the whole County. Nearly all information in the report is given for all five districts and the County. But there are more districts who are not involved in this report than the two that are.

The other three districts have had no apparent role, involvement or control. So, it surely follows that the other three districts will in no circumstances be bound by this piece of work. They will have to develop and consider their own figures – maybe together?

If, wrongly, there is pressure on the other three districts to accept whatever Oxford and Cherwell decide, the other districts might think it best to hold back on further development in their areas, to protect the Green Belt, AONB and so forth. Much land has already been zoned for housing and acceptable and suitable sites are hard to find.

One example of the previous overspill from Oxford is that it resulted in a large part of Abingdon Airfield being zoned for development. This site is not well connected and is separated from the rest of the town by the A34. It can only be developed if the MOD release it.

The rest of this report criticises the HENA. It is long, so a summary of main points made listing paragraph or other references follows:

- There are many cases where figures from the 2021 Census are now available instead of those in the report. It was too early to fully understand the results of the 2021 Census at this point. There are many references in the following note, including Paras 2.1.8, 3.17, 3.4, 3.1.10, 3.2 3.4.8, 3.3.5, Figure 3.2, 3.6.1, 3.6.2, 3.6.4, 7.4.19, 7.4.23, 7.7.9
- NNGO is concerned about the assumptions made about Household Representative Rates. 3.6.2, 3.6.4, Annex 1

- The HENA Lacks comprehensive detail and clarity in some places and there are some apparent errors. 4.2.7, 7.4.28, 3.17 and 3.4.8
- The projections straying off their territory by considering 3 other districts - Chapters 5 and 6
- Growth rate figures that have been considered and rejected were resurrected - 7.1.6, 7.2.1, 7.2.12, 7.7.4
- The standard method of calculating housing need will be '*an advisory starting-point to inform plan-making – a guide that is not mandatory*' 7.2.2
- There are also likely relaxations of government planning rules planned, notably removing the 5yr housing land supply requirement and the extra buffer added to growth, 2.1.8, 7.2.2
- Recent years have seen a lot of growth driven by Local Plans. But existing economic conditions are poor. Will rapid growth continue? 3.17
- Migration rates in the past 10 years of 2,287 per year is almost 17% below the last five years which the HENA relies on (2,752). The ten years of evidence from Census to Census is more relevant and accurate than just the last five years. Also, where will all the migrants who are needed to support the growth come from? 3.3.5, 3.4.16, 3.4.19, 7.1.6

## NNGO Paragraph by Paragraph Comments

**2.1.7** – The ‘Standard Method’ is not ‘*a minimum level of housing need*’ as stated in the report. It is set so that the government might meet its arbitrary high target of building 300,000 houses a year. A target that has not been met.

**2.1.8** – The Standard Method uses the 2014 based household projections. Lower growth rates were found in subsequent projections in 2016 and 2018, but these were ignored and no corrections were made to the 2014 figures.

A recent government consultation (with a deadline of 2 March 2023) says:

*16. The government does not propose changes to the standard method formula or the data inputs to it through this consultation. However, the government has heard representations that the 2014-based household projections data underpinning the standard method should no longer be relied on. The government continues to use these data to provide stability, consistency and certainty to local planning authorities. Once we have considered the implications of new 2021 Census based household projections, planned to be published by the Office for National Statistics in 2024, the government will review the approach to assessing housing need, to make sure the method commands long-term support based on the most relevant data.*

From: Levelling-up and Regeneration Bill: reforms to national planning policy  
Published 22 December 2022:

<https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

It is too early to reliably consider all the implications of the 2021 Census – which is still being published - let alone the likely effect on the household projections. We do know that the 2014 based figures are now at least seven years out of date.

On the standard method, paragraph 4 and 5 of the consultation comments as follows:

*We have heard that:*

- *there can be confusion about how and when it is acceptable to bring forward a plan that does not meet housing needs in full due to recognised constraints such as Green Belt. As a result, some local authorities are not progressing plans, or are struggling to make their case at examination.*
- *some major urban centres are not meeting, or proposing to meet, their housing need in full, with the prospect of it being ‘exported’ to surrounding areas, contrary to the objective of delivering need in those areas with the best sustainable transport links and infrastructure, and with the greatest brownfield opportunities.*

- *delivering more homes than expected in the early years of a plan can create a “ratchet effect” as local authorities have to find more land for homes, even if overall they have delivered on expectations, thus disincentivising ambitious plans.*
- *some authorities are subject to consequences through the Housing Delivery Test due to developer behaviour when they are granting more than enough permissions.*
- *areas with recently made neighbourhood plans can find that those plans are overridden and open to unplanned development because the local planning authority cannot demonstrate a sufficient supply of housing, or their plans are set aside due to low performance in the Housing Delivery Test.*
- *there are concerns about the pace at which some sites, which have been granted planning permission, move through to construction and completion of new homes.*

Most of these issues have been experienced in Oxfordshire. We particularly note the point about urban centres that don't meet their need in full, which leads to pressure on surrounding areas and development in areas with no brown field land or with poor transport links.

The consultation then goes on to propose changes to the National Planning Policy Framework (NPPF) as follows:

*5. The combined effect is to inhibit plan-making, fuel opposition to development and ultimately hinder the supply of high-quality homes where they are needed. To address this, we propose making changes to the current National Planning Policy Framework and associated guidance on local housing need and the Housing Delivery Test. **These changes are designed to support local authorities to set local housing requirements that respond to demographic and affordability pressures while being realistic given local constraints.** Being clearer about how local constraints can be taken into account and taking a more proportionate approach to local plan examination is intended to speed up plan-making. Since we know that areas with up-to-date local plans have higher levels of housing delivery compared to authorities with an out-of-date local plan, or no plan at all, this is an important part of boosting housing supply...*

So, the need to be **realistic given local constraints** has been recognised by the government and is likely to be emphasised in forthcoming guidance.

**2.2.1** – This emphasises the need for innovation and high levels of productivity in Oxfordshire. However, it is increasingly obvious that this country will not develop unless these targets are acknowledged in all areas. ‘Levelling up’ across the country might best be achieved by other areas catching up on Oxfordshire.

**3.17** – Census 2021 does show that growth has been higher over the last ten years than was predicted by ONS figures rolled forward year by year from 2011. However,

growth in the past is not necessarily a guide to growth in the future. Economic prospects at the moment seem particularly dim considering:

- The continuing war in Ukraine and more concerns about China;
- Sudden high levels of inflation and higher interest rates;
- Low growth compared to other nations;
- Lower imports and exports, supply chain problems and de-globalisation;
- Obvious signs that even just over 1 degree of global warming is leading to more extreme weather across the globe and record temperatures in the UK;
- Continuing low investment and related productivity growth;
- Concerns that housing is overvalued; and
- Shortage of workers. This is partly as people have left the labour market during Covid and not returned. Often older workers or due to increasing poor health...

Also, it is worth noting that ONS have recently (21 December 2022) released population estimates for mid 2021, based on rolling the Census figures forward a few months. These show a little more growth at the County level. They also show net migration out of Oxford within the UK of -2,204 as follows:

### **Oxford - From Census data to mid-year 2021**

<b>Census 2021</b>		<b>162,080</b>
Births	359	
Deaths	220	
Births minus Deaths		139
Internal Migration Inflow	2,580	
Internal Migration Outflow	4,784	
Internal Migration Net		<b>-2,204</b>
International migration Net		6
Other		0
<b>Estimated Population mid 2021</b>		<b>160,021</b>

The net emigration of 2,204 people from Oxford may have been due to students leaving Oxford to return home – but this is not certain.

The mid 2021 population estimate for Oxfordshire is 726,530.

**Table 3.4** - The figure of 162,100 shown in this table is the rounded first release population figure from the 2021 Census. Since then, more precise unrounded figures (162,080 for Oxford for example) have been released. On 7 February 2023, more precise details of the numbers of students in Oxfordshire were released (39,625).

ONS have also announced that they will review the mid-year estimate series from 2011 to 2021. It will be interesting to see the resulting path of change.<sup>1</sup>

So overall, these projections use early figures from the Census which are being replaced by unrounded figures. More details are emerging as time passes.

**3.1.10, Table 3.6 Table 3.7** – The consultant contrasts 2014 based projections with the Census figures. The Census was in 2021, which was ten years after the start of many Local Plans in Oxfordshire (for example the Vale Plan period was 2011 to 2031 and it was adopted in 2016). The plan was based on assumptions that there would be a lot of growth, so there has been five years during which the adopted plan affected growth before the 2021 Census. So, it is not surprising that the 2021 Census shows more growth than the 2014 based figures – that was planned! The question posed by this report now is whether that growth is continuing and whether it will continue in the years from 2031 to 2040.

We also note that the projections show reductions in the population of Oxford. With apparently 4,300 less people and 6,900 less households compared to the 2014 based sources. This paints a picture of an area in decline, which can no longer house as many people or households as it once did – or maybe one where other uses have crowded out people and households. Census 2021 was affected by the Covid lockdowns and this may have produced this effect. Alternatively, it now seems possible that the 2014 based figures started from too high a base? Revised mid-year estimates for 2011 to 2021, which ONS are preparing, may help to give a clearer picture of what happened in Oxford.

**3.2 – Students.** This is a difficult area. Broadly, students arrive and spend maybe three years at university then generally, leave the area. Some stay on to find work, so are no longer students. This means that the age structure of the student body is relatively stable over time. They should be excluded from population projections – otherwise they age into later years and are not replaced by younger students. That is unrealistic and incidentally tends to drive up the need for housing!

Census 2021 results has given us quite different figures for Student numbers in Oxfordshire:

58,299 in the Socioeconomic classification  
59,733 in the Economic activity tables  
39,625 in the Student Dynamic Population Model

The first figure initially seemed to be the most reliable, as the second includes people who said they were studying in the week before the Census, but who were not necessarily full-time students. This distinction was identified recently following advice from ONS. However, the third and much lower figure of 39,625 is apparently the most accurate one. So overall there are around 40,000 students in Oxfordshire.

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<sup>1</sup> See Section 5 of:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2021>

This number may have grown since 2011. It is not clear what the HENA has assumed about student numbers or whether they are excluded from the projections. They may have been included in the 2014 based projections.

ONS also advise that for 2021:

*Identifying the number of people in Oxfordshire who aren't students will also be possible using datasets for the out-of-term population when they become available. [Alternative and small population](#) data will be released as part of Phase 3 of our Census 2021 [release plan](#)*

So, we probably need to wait and see before we have more population data for Oxfordshire that excludes students. Note that some students who attend Oxford University (for example) will have a home in the County. They will be included in the 'out-of-term' figures for Oxfordshire.

Also, Covid is likely to have affected student numbers as they were sometimes sent home to learn remotely...

Looking back to the 2011 Census, results are similar but with a much larger gap between two sources for the number of full-time students:

Table number	Oxfordshire students	Oxford students
KS611EW Employment	53,909	32,803
KS501EW Qualifications	27,904	22,968

These figures are very different, with the lower figure for the County around half the other. It has not been possible to reconcile these figures, but if student numbers were much lower in 2011, then some of the population growth would be explained by that.

See further comments on paragraph 3.6.1

**3.4.1 – 3.4.3 Fertility** – It is difficult to comment on these and subsequent paragraphs as general descriptions are given, but there are no figures. But we note the overall downward adjustment to fertility rates used in the projections.

**3.4.4 – 3.4.6 Mortality** – Similarly it is difficult to comment. But we note that mortality rates in the projections are increasing.

**3.4.8 – Migration** – We now have 2021 mid-year figures based on the 2021 Census so no need to estimate if from the SNPP. As follows:

	<b>Mid 2021 Population</b>
Cherwell	161,837
Oxford	160,021
South Oxfordshire	150,024
Vale of White Horse	139,487
West Oxfordshire	115,161
<hr/>	
Total	726,530

**3.3.5, 3.4.12 & Table 3.10, 3.11 – Net In-Migration** – The key past trend net migration figure of 2,752 per year, in Table 3.11, is based on estimated net migration flows in the five-year period 2015-2020. However, earlier, in paragraph 3.3.5, the consultant noted that:

*The use of a 5-year period is consistent with projections typically developed by ONS (although in more recent releases they have also looked at different time periods, e.g. 10-year trend)...*

Alternatively, net in-migration figures in the 10-year period 2010-2020 average 2,287, over 16% lower than the figure of 2,752. These figures are likely to be changed when ONS produces a revised series of mid-year estimates between the 2011 and 2021 Censuses. It seems likely that the higher levels of net in-migration in recent years arises from the effects of the local plans – in the longer term there is more uncertainty and a lower figure would be more reasonable. There is no long-term evidence that Oxfordshire sustains continuing high net in-migrant flows. Low figures were experienced late in the period – in 2016/17 (1,802) and 2018/19 (2,235).

As usual, there is no information about where the migrants will come from. Will they be drawn from other parts of the UK – in which case will those areas be affected economically by losing their working population to the SE of England? People leaving other areas also frees up housing there...

**3.4.16 In-migration** – Age structure. Here the consultant notes that an aging population would be less likely to migrate. As the whole of the UK is aging, that seems to imply lower migrant flows in future?

**3.4.18 – In-migration** – We don't see the consequences of this rather complicated set of assumptions. For example it is *'considered with an increasing population that levels of in-migration will increase over time, but at a reducing rate'??*

**3.4.19 – Out-migration** – Again, no consequences of the assumptions are shown. It is as unclear as the above. Saying *'a changing age structure (increasing older person population) will to some extent moderate any changes, as older people are less likely to be migrant'??*



**Figure 3.1 – Natural change** – We are moving from a positive natural change towards a negative one (where deaths exceed births).

**Figure 3.2** – This shows the variability of net migration in past years and the amount added based on the Census results (though this seems to have been added to every year, instead of being spread out over the period. Also, it shows the effect of assuming that high net in-migration rates since 2011 will continue indefinitely into the future (purple line).

**3.5.2 – Population projections** – We note that there is a 7.6% increase planned, rather lower than the 10.9% growth up to the 2021 Census.

**Table 3.12 – Population projections** – This shows 7.6% growth between 2022 and 2032. A particularly noticeable feature is the 27.1% growth in the numbers of people aged 65+ in just 10 years from 2022 to 2032! So 65% of the total growth may be due to having more old people (36,221/55,594) The number of under 16s reduce. More houses suitable for the elderly are likely to be needed!

Only limited details of the population forecasts are given – just the three age groups in this table. More details would have allowed more scrutiny of what is projected.

**Table 3.13 – Change in the number of households and dwellings 2011-2021–** The table shows that households (groups of people) have increased a lot more slowly than dwellings (the properties they live in). Households increased by 29,300, dwellings by 35,700.

Dwellings as a percentage of households has increased from 104.1% to 105.9%. So, whereas about 4.1% of empty dwellings were empty, now there are 5.9%. If the percentage had not changed, there would have been 5,200 fewer dwellings. Thus, over the ten years, Oxfordshire now has 5,200 more dwellings with no household living in them.

This gap might be explained by an increase in the number of second homes, houses undergoing comprehensive repairs that make them uninhabitable, or just more empty houses. These suggest that the housing market has become more inefficient than it was. Vacancy rates of around 3% - even lower than the 4% in 2011 - should be sufficient to allow the housing market to operate efficiently.

**3.6.1 – Communal population** – This paragraph notes that the communal population (people living in army camps, colleges etc) need to be discounted before making household forecasts. This is correct, but it is not clear what deductions have been made or whether they were made before the population projections were run.

The communal population generally needs to be taken out of the population before it is aged on into the future in the projections. This prevents – for example - the university student population aging in the projections when in the age structure of that population will not change. The 2021 Census results may eventually be able to give a good idea of the communal population and eventually of the ‘at home’ population, where all students are moved from their term time addresses back to

their home address. At this stage there are some concerns about the number of students – see previous comments on paragraph 3.2.

**3.6.2 – 3.6.4 Household Representative Rates (HRR)** – These paragraphs justify the use of household formation rates from the 2014 based Household Projections. In particular questioning treatment of people aged 25-34. There is little detail at this point. We have previously commented at length on this issue, in response to the consultation about the 2050 Oxfordshire plan, figures for which came from the same source. Our comments are shown in Annex 1. In summary, our arguments are that:

- The existing housing supply system has had rising house prices for many years – often pushed up by very low interest rates. Also, various government interventions such as help to buy, and stamp duty holidays supposedly increase affordability. But in practice, buyers can afford more so sellers increase prices to absorb this;
- This is compounded by worsening conditions in the jobs market, with stagnant wages, insecurity, low pay, zero hours contracts and low-quality self-employment. Recent widespread strikes in the public sector have not, as yet, earned pay rises in line with inflation, so employees are hard pushed and worse off;
- Recently, interest rates have risen, increasing the costs of many mortgages. This is coupled with rapidly rising prices, so there is a cost of living crisis for many families;
- One outcome is that there has been increasing use of the rental sector by younger people;
- Many big changes in housing and employment market would be needed to move away from this broken system;
- NNGO thinks it is very unlikely that increases in headship rates will ‘just happen’ as projected by the consultant. NNGO thinks that significant changes would need to be made to both the existing housing and labour markets.
- Building more expensive new houses will not make housing and home ownership more accessible to younger people;
- Higher HRRs in later age groups may compensate for the economic issues facing people aged 25-34. There may be a ‘swings and roundabouts’ effect, with no clear overall pattern that 2016 based HRRs are lower or higher than the others; and
- Applying higher HRR rates to the projections will increase the projected number of households. So, subsequent considerations of the local housing market to allow for affordability for example, need to beware of double counting need. Increasing HRRs would have reduced the scale of the need;

- Finally, more information about HRRs may be available from 2021 Census results. Quite a lot of information on housing was released on 5 January 2023 for example<sup>2</sup>

**3.6.4 Communal population** – As noted earlier in para 3.2, The 2021 Census should eventually give more up to date information about the ‘communal’ population - students, armed forces and so forth. Also, about the HRRs.

**3.6.5 Household projections** – the projected growth of 3,274 households per year is noted. As explained above, NNGO thinks this is too high.

**4.1.1 House prices** – As well as being affected by inflation and the balance of supply and demand, house prices are affected by interest rates as noted later. They are often pushed up by government schemes such as help to buy and changes in stamp duty.

**4.1.5 Help-to-Buy** – We think that this scheme has in practice pushed up house prices. Buyers can afford to spend more, sellers know that and take the benefits by pushing up prices. See comments above in para 3.6.2.

**4.1.6 Low recent house price increases in Oxfordshire** – This compares Oxfordshire’s increase over the last five years of 2.1% compared to 3.3% for the SE region and 3.7% nationally. This is correlated to ‘*stronger housing supply across the County*’. But it could be due to lower demand. Or other factors may be affecting the SE region or locally. New house prices now seem to be falling due to the higher interest rates.

**Figure 4.8 – New-Build sales** – Not really a surprise that new-build sales have been a higher percentage of sales in Oxfordshire in 2017-22. These were times when sites in the 2011-2031 based plans came on stream. Builders don’t tend to build houses unless they are sure they can sell them.

**4.2.7 and Table 4.3 – Affordability ratios** – This says ‘*The ratio in all Oxfordshire authorities is above the South East average.*’ But this is not the case as in 2018 and 2021, both Cherwell (9.77, 10.28 respectively) and Vale of White Horse (9.87, 9.96) are below the averages for the SE region (10.37, 11.12).

**4.2.9 First time buyers, Mortgage payments relative to take-home pay** – The increase is explained as *the ‘pandemic effect on house prices’*. But it could more directly be the effect of raising of interest rates. That was in response to price increases driven supply problems as Covid lockdowns and restrictions were removed, but more directly by the fuel price increases as a result of Russia invading Ukraine. Whether it was wise for the Bank of England to raise interest rates when a recession seemed to be on the horizon, remains to be seen.

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<sup>2</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingenglandandwales/census2021>

**4.3.1 Market outlook** – The ‘mini budget’ of September 2022 nearly had catastrophic effects on bond prices and the Bank of England had to intervene. It also pushed up the interest rates we were expected to pay as international financial confidence in the UK reduced.

**4.3.4 Long term** – We think there are long-term embedded problems with the housing market and they are set out in section 3.6.2 above.

**4.4.1 Median rents** – Table 4.4 does not show the England averages, so it is difficult to say if the statement ‘*Median rental costs in Oxfordshire overall, as well as all local authorities, within it are higher than both the South East and England averages*’. For the SE region this is only the case for the ‘Overall’ figures. In various cases, the average in one district is the same as the South East figures:

Room	- Cherwell
Studio	- West Oxfordshire
1-bed	- West Oxfordshire
2-beds	- Cherwell
3-beds	- Cherwell
4-beds	- Cherwell

**4.4.2 Figure 4.11 Median rental costs over time** – This notes that median rents have increased by £100 in Oxfordshire (10%). This rate is higher than that of the South East (8.6%) but lower than England (11.4%). So, there are some signs of rent affordability differentials abating.

**4.4.3, 4.4.4, 4.4.5, 4.4.7** We note that rents in Cherwell increased, but not as fast as in the other districts. Demand for rental properties is seasonal and in 2020, 2021 and 2022 has generally been higher than in 2019 (hardly surprising as 2020 was the first year with lockdowns). Increasing working at home and energy prices have increased demand for larger properties and for more energy efficient properties respectively. Buy to let has become less profitable due to loss of mortgage interest relief and higher Stamp Duty, but this seems likely to make more property available for sale to owner occupiers. There is evidence of increasing demands in subsequent paragraphs.

## Chapter 5 – Office and R&D Market Review

All the figures and tables are for Oxfordshire and often all other districts, though this is a document considered and decided upon by Cherwell and Oxford, so straying off their territory:

- Figures 5.1, 5.2, 5.3, 5.6, 5.7, 5.8, 5.9, 5.10
- Table 5.1, 5.2, 5.3, 5.4
- Figure 5.4, 5.5 (A34 corridor)
- Figure 5.9 (Botley, Abingdon, Milton Park)

There seems likely to be less demand for Office space as more people work from home for at least part of the week (5.2.1). More intensive use of office space also seems to be a trend (5.1.4). There does seem to be a shortage of Grade A office

and laboratory space in central or ring road locations in Oxford (5.3.4). The Oxford North development may provide suitable space and seven other locations are mentioned (5.4.1)

- Oxford Business Park
- Oxford Science Park
- Oxford North
- Begbrooke Science Park
- Abingdon Science Park
- Harwell Campus

The last two are not in Cherwell or Oxford, again, straying off their territory...

Oxford and Cherwell are not responsible for planning the whole County...

## Chapter 6 - Industrial Market Review

All the figures and tables cover Oxfordshire and often all other districts, though this is a document considered and decided upon by Cherwell and Oxford, so they are straying off their territory again.

- Figure 6.1, 6.2, 6.3, 6.4, 6.6, 6.7, 6.8, 6.9, 6.10
- Table 6.1, 6.2, 6.3, 6.4, 6.5, 6.6
- Figure 6.5 (A34 corridor)

Oxford and Cherwell are not responsible for planning the whole County...

**6.1.4, 6.1.5, Figures 6.2, 6.3** Considers industrial floorspace in Oxfordshire. There was a sharp rise to a peak in the latest year for which data is available 2020/21. This has been driven by industrial development in Cherwell.

**6.1.6, Table 6.1** Cherwell and the Vale of White Horse have the highest percentages of 4 to 5-star floorspace whilst Oxford, South Oxfordshire and West Oxfordshire have very little of this high quality floorspace. However, Oxford has a very low percentage of 1-2 star floorspace.

**Figure 6.4** Shows the Industrial floorspace taken up by Sector. Out of 7 years, in 6 the main take up is for 'Distribution'. So warehouses – these are increasingly automated, so do not provide many jobs. Jobs in the unautomated versions tend to be low paid and physically challenging. Science & Technology took up most space in 2018 (not in the pandemic then) and has been second largest in the three following years. Both trends may be linked to the pandemic (where buying online became a major option as well as vaccine development). It is not clear if these trends will continue – has the need for them been filled?

**6.4.1** One of the five 'Key Development Sites' listed is Tungsten Park, Whitney (Sic). On the West side of Witney, Tungsten Park is some way away from both Cherwell and Oxford...

## **PART B: Reviewing and Refreshing Oxfordshire's Growth Scenarios**

Growth scenarios are either pushed by demographic/housing growth or pulled along by predicted growth in job numbers. Both are built on stacks of assumptions about what will happen in the future. NNGO thinks the future is more unpredictable and unstable – who would have projected the events of the last few years? Brexit, Austerity, Covid, the invasion of Ukraine, the Truss prime ministership, growing inequality and poverty, widespread strikes...

**7.1.6 and 7.1.7, Table 7.2** NNGO very strongly disagreed with the 2021 OGNA report, which we felt took every opportunity to assume that there would be growth, growth and then a bit more growth. It was part of the 2050 Oxfordshire plan.

In particular, the so called 'Transformational' option (Table 7.2, where it is shown as 148,329 more houses in thirty years) meant building one new house for every two houses that we now have in Oxfordshire. This was equivalent to building a new Oxford and Banbury and Abingdon and Witney and Bicester and Wantage. Construction on that scale would urbanise the whole County. The amount of construction, infrastructure, roads, railways, water supply, disruption, CO2 emissions, pollution, damage to the environment, Green Belt ... resulting would be incredible.

NNGO estimated that around 11,000 net migrants to the County would be needed every year to reach that unacceptable future.

Table 3.10 shows the past trend net migration figures. As we noted earlier, net migration averaged 2,287 per year in the last ten years. Adding 2,674 say (Table 3.11) to that to correct for the 2021 Census figure gives an average net migration in the last ten years of 4,961. This is not quite half of the 11,000 we would need, every year for the next 30 years.

But where would all these people come from? The government has tightened up on immigration from abroad, so most might have to come from other parts of the UK. But where? And which areas would be happy for their young/employable people to move to Oxfordshire? It would put a very serious dent in the idea of Levelling up the UK.

For this reason, NNGO was relieved when the 2050 Oxfordshire plan was abandoned. Now we are seriously disturbed by the resurrection of this most unlikely scenario.

**7.2.1** This is an attempt to resurrect the previous figures. NNGO does not think we should build Oxfordshire's future on the ruins of a previous overly-ambitious plan. Nevertheless, the consultant continues this process...

**7.2.2** In the light of the recent government consultation about the standard method calculation will be '*an advisory starting-point to inform plan-making – a guide that is not mandatory*'

**7.2.6** We note that the consultant goes on to say that in 2021 the standard method produced a figure of 3,383 dwellings per year, 756 in Cherwell and 762 in Oxford. The total was revised to **3,386** (67,720 houses over 20 years).

**7.2.12, 7.2.13** These reintroduce the ‘Business as Usual’ and ‘Transformational’ scenarios. Business as usual extrapolated jobs growth 2008-18 to 2050 (so projecting 32 years forward from a ten-year base, ambitious to say the least). This increased the numbers of houses needed to **4,113** per year. The Transformational option was based on the view of the Local Enterprise Partnership (an unelected, unaccountable body). Using a ‘go for growth’ scenario this expected Oxfordshire’s GVA to double by 2040. This needed **5,093** houses per year – over 30 years, one for every two that we now have.

**7.3.4 Table 7.4** These show the calculation of the standard method housing need figure, which is 3,388 for Oxfordshire. Note that this is based on 2014 based household projections – somewhat out of date.

**7.3.8 Table 7.5** This takes the projected figure of 3,274 – from para 3.6.5 and Table 3.14 that we have criticised earlier. Adding 44% for affordability, based on median the house price to income ratio in the area, this gives a figure of **4,721**.

We are not shown the median house price to income information, so it is difficult to comment and we can’t check the figures shown...

**7.3.11** This argues that high levels of growth can continue for long periods:

*In response, it can be said that as a general rule, the factors that lead to strong economic performance in a local economy such as access to high skill labour markets, and high rates of innovation and investment, once established, tend to remain and support ongoing growth,*

**7.3.13** Then a new projection from Cambridge Econometrics is introduced, as follows:

*‘The new projection, while accounting for the County’s strong past performance, also reflects negative GDP shock of the Covid-19 pandemic and subsequent recovery, plus the economic uncertainties surrounding ‘Brexit’.’*

So, they go from saying growth can continue for long periods, whereas within a year there were unpredicted shocks from Covid-19 and economic uncertainties surrounding Brexit, which meant that the figures had to be revised. So much for long accurate long-term projections of continuing growth that we can depend on! NNGO also notes that:

- The ‘subsequent recovery’ from Covid was weaker in the UK than other countries; and
- The UK is short of labour, partly due to older people leaving the workforce as a result of the pandemic and not returning. General levels of ill-health have risen.

- We now have a very serious higher interest rate and inflation problem with waves of strikes due to inequality – many workers in the public sector and notably the NHS have seen their real wages reducing for years and years, and are now faced with rocketing fuel prices, inflation across the board and higher mortgage costs.

**Figure 7.2** Compares the different economic scenarios. The red line is the 'Economic Development led' figure now noticeably higher than the black line which is the 2022 baseline. Nevertheless, the '*Economic Development led*' scenario is now repurposed as a replacement for 'Transformational economic growth'

**7.3.16** Recently proposed amendments to the NPPF will have a more nuanced and flexible approach, for example (proposed additions are highlighted):

Para 1 – a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner.

Para 7 - The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner.

Para 20 - Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, (to ensure outcomes support beauty and placemaking),

Para 61 - To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used should also reflect current and future demographic trends and market signals.

So in brief, be sufficient (not excessive), sustainable, support beauty and placemaking and the standard method is an advisory starting point...

**7.3.22** Says:

*However, it remains possible that macro-economic events and public funding constraints may slow projects down or lead to some not progressing. Equally there are potential downside risks to economic growth associated with the global geopolitical and macro-economic circumstances in 2022. These are considered in more detail later in this section (7.7.21).*

To bring these comments together, Para 7.7.21 says:

*7.7.21 As of the end of 2022, global geo-political events, following on from the economic disruption of the Covid-19 pandemic, are indicating a prolonged period of economic weakness. This is reflected in recent Bank of England*



*forecasts that predict a UK recession throughout 2023 and into early 2024. While history shows that recovery from economic downturns is often strong, as was the case in the period after the 2008 Financial Crisis, it is difficult to speculate about the path of recovery in the UK and global economy over the next 20 years.*

So why are we being asked to pin the environment and economic future of the whole County on a projection 20 years into the future???

**7.4 Table 7.6** There is little justification for using fixed ratios over a long period. Drastic changes in home working occurred as a result of the unexpected pandemic for example. Technology also drives changes in the workforce, for example in warehousing, automation is more common than it was, reducing the labour required.

**7.4.19** In the original OGNA, Commuting was described as *‘Oxfordshire currently has a net commuting inflow of 20,500 people’*. Distinctly variable figures are shown in **Figure 7.4**. We approached ONS to check the source of these figures and they advised that the figures were not suitable for use. So NNGO considers that they are not fit for purpose.

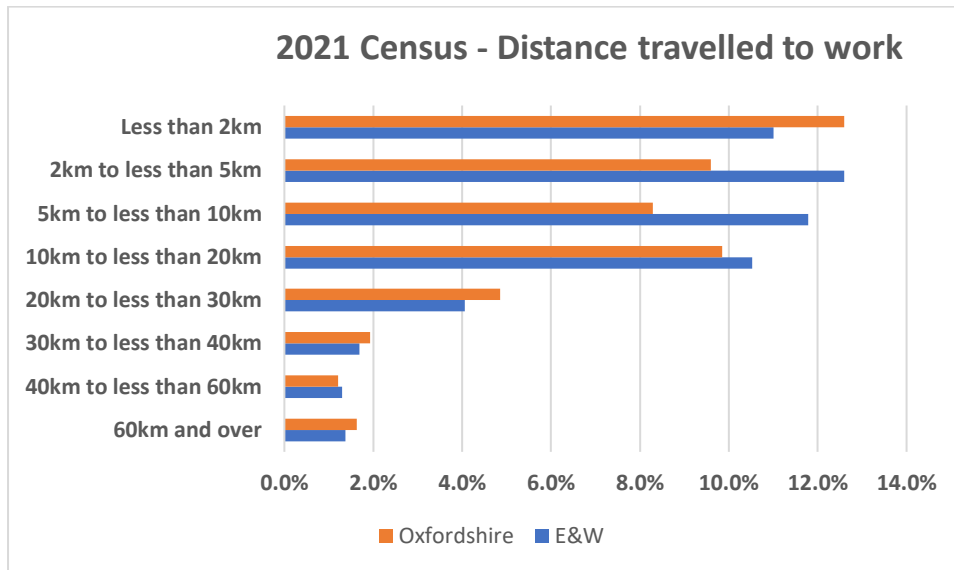
Some commuting figures have recently been released from the 2021 Census – however so far these only show method of travel to work and distance travelled to work (in a straight line)<sup>3</sup>. We should in due course get more detailed figures showing a matrix showing the origins and destinations of trips to work which will give a better net figure for Oxfordshire. Commuting is therefore a prime example of where we think the consultants comments are wrong and it would be better to wait until the full 2021 Census results were available.

The 2021 Census data that has been released is of some use. The chart below shows how far people in Oxfordshire and England and Wales travelled to work (ONS measured the distances in a straight line from origin to destination, actual trip lengths by road would almost certainly be longer):

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3

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021>



Large percentages of people in Oxfordshire travel 20Km or less to work. Some worked 60Km or more away – most likely out of the county, for example in London<sup>4</sup>. This was during the lockdowns, so many people were working at home. But at that time, 50% of people were working mainly at home (37.9%, not shown on the chart, plus 12.6% travelling less than 2Km). Home working was roughly three times as high as in 2011 (increasing from 10.3% in 2011 to 31.2% in 2021).

**7.4.23** This and subsequent comments suggest that the consultant considers that having a lot of in-commuters is something that needs to be corrected by providing more houses for them in Oxfordshire. NNGO disagrees, for various reasons:

- We don't agree that net in-commuting to Oxfordshire has increased to over 20,000 people in 2019.
- Most people travel short distances (22.2% less than 5Km) and this will be true of people commuting into or out of the County. For example, you might live in Henley but commute to Reading to work (13Km), or travel just across Henley Bridge into nearby Berkshire. These people have made a choice about where they live and are unlikely to want to move into Reading (for example). If they did, that would free up houses in Henley.
- Why therefore should we have to build extra houses in Henley (say) to house people who just cross a bridge over the Thames to work there?
- We have 5,946 people in the 2021 Census who commute more than 60Km to work. Let's say, in London. Again, let's assume they are content with that – everyone makes choices. Does London – a more expensive area - have to build a house for all these people so they can avoid such a long trip? If they did move, that would free up houses in Oxfordshire

The increases in opportunity to work at home further reduces the probability that people will want to move to avoid commuting.

<sup>4</sup> Banbury to Henley on Thames is 80Km by road, so an in-County commute of over 60Km is possible!

Of all the assumptions made in these forecasts, this is one of the worst. Poor data plus little understanding of reality but nevertheless twisted to increase the number of houses 'needed' and the profits of developers working in Oxfordshire...

**Figure 7.5** – There is no evidence that increases in miles travelled is due to increased long distance commuting. It could just be the effect of more car ownership, more miles run by delivery vans, more short trips, more taking children to school, pandemic cutting public transport options in 2019...

**7.4.28** From the 2021 Census, Oxfordshire mainly working from home rates were 37.9% (not 30% as in the consultants figures). Cherwell was 32.2% (not 24%) and Oxford was 38.8% (not 28%). Vale of White Horse was 41.3% (correct as 41%). South 42.8%, West 35.0%.

**7.4.24** In short, NNGO does not think the commuting figures used are accurate. We think many commuters making short trips to work across the County boundary in either direction, are likely to be content with their current arrangements. So there is no obvious housing problem to solve. Building thousands more expensive new houses in Oxfordshire is unlikely to help.

**Table 7.8 and 7.9 – key information, rearranged**

	Standard Method	Housing led 2012 Census adjusted	Cambridge Econometrics (CE) Baseline Trend	Economic Development Led = Transformational
		<b>Recommended see Para 7.7.23</b>		Rejected – 7.7.21, 7.3.22
Housing need	3,388	4,721	4,406	5,830
Workforce/Labour Demand	460,268	460,268	460,268	489,655
Resident workers Labour Supply	425,411	452,926	446,422	475,809
Shortage of workers	34,857	7,342	13,846	13,846
In-Commuting demand / target	22,657	4,773	9,000 *	9,000 *
Population 2040	875,522	932,148	918,763	979,244
Housing market effect supply/demand	9.9%	9.9%	8.6%	10.1%

Shortage of workers = Labour Demand – Labour Supply  
 In-commuting is 65% of the 'Shortage of workers'

\* With home working

These options imply the following Population growth from 2021:

	<b>Standard Method</b>	<b>Housing led 2012 Census adjusted</b>	<b>Cambridge Econometrics Baseline</b>	<b>Economic Development Led = Transformational</b>
Population 2021	726,530			
Population 2040	875,522	932,148	918,763	979,244
Percentage growth, 19 years	20.5%	28.3%	26.4%	34.8%

Assuming that growth rates for the next 20 years are the same as the increase from 2011 to 2021 gives the following set of figures:

**Assume that the 2011 to 2021 Growth rate continues**

	<b>Start of period</b>	<b>Change</b>	<b>Percentage</b>	<b>End of period</b>
<b>2011 to 2021 Actual</b>	<b>653,798</b>	<b>71,477</b>	<b>10.9%</b>	<b>725,275</b>
<b>2021 to 2031</b>	<b>725,275</b>	<b>79,291</b>	<b>10.9%</b>	<b>804,566</b>
<b>2031 to 2041</b>	<b>804,566</b>	<b>87,960</b>	<b>10.9%</b>	<b>892,526</b>
<b>Change over 20 years</b>	<b>725,275</b>	<b>167,251</b>	<b>23.1%</b>	<b>892,526</b>

So over 20 years a growth rate of +23.1% might be achieved. This is slightly more than the Standard method (20.5%) but some way short of the Housing led figure (28.3%) and a very long way short of the Economic Development led figure (34.8%).

**Table 7.10** Presumably, each district will wish to consider its own standard method figure and then make a decision about what its views are, in the light of the changes to the system. Apart from this table, the subsequent discussions and tables (Table 7.11, 7.12) seem pointless and it is hard to see them being of interest or likely to be implemented. NNGO notes the point that these projections imply that Oxford and Cherwell 'are projected to represent well over half of the FEMA's employment by 2040'. Oxford certainly needs to consider how it might absorb more of its supposed needs within its boundaries.

**7.7.4** This says that delivering the housing required by the standard method (as calculated in the HENA) will not provide enough labour to support the Oxfordshire economy compared to the CE 2022 based employment baseline projection. NNGO disagrees for various reasons:

- The standard method is supposedly designed to produce 300,000 houses a year – more than are likely to be needed. Once that is satisfied, we don't need to do more if we consider other issues such as the environment and global warming. This view is likely to be reinforced by the revised NPPF . Will other areas do less if we do more?;
- We think the figures projecting employment are over-optimistic, so can't be used as a valid criticism;
- Such rapid growth would undermine the national levelling up agenda that is still on the table; and
- The Oxfordshire economy can in any case, respond to labour shortages in other ways – by increasing productivity and efficiency – and hopefully wages.

**7.7.7** Referring to the standard method, this says that '*it seems unrealistic to assume that this scenario is likely to see affordability improve*'. But NNGO notes that Table 7.8 gives a 'Housing market effect' of the standard method, when adjusted for 2021 Census figure of 9.9%. This is more than figure for the '2022 CE Baseline' in Table 7.9 of 8.6%. It also approaches the figure of 10.1% for the 'Economic Development Led' or Transformational scenario.

**7.7.9** The Census Adjusted Scenario '*sets the level of housing 40% higher than the 2014-based standard method, reflecting recent population trends revealed by the 2021 Census*'. That is a considerable adjustment. Too much says NNGO!

The following table shows one estimate of the extent to which Oxfordshire's population increased by more than estimated from 2011 to 2021:

### **ONS underestimate of population growth in Oxfordshire to 2021**

	<b>Start of period</b>	<b>Change</b>	<b>Percentage</b>	<b>End of period</b>
<b>2011 to 2021 ONS estimate</b>	<b>653,798</b>	<b>46,590</b>	<b>7.1%</b>	<b>700,388</b>
<b>2011 to 2021 Census</b>	<b>653,798</b>	<b>71,477</b>	<b>10.9%</b>	<b>725,275</b>
<b>Differences</b>		<b>24,887</b>		<b>24,887</b>

Source: 2018 based projections for 2021

Overall, population growth was 24,887 more than ONS estimates. The increase was by just 3.8 percentage points, from 7.1% to 10.9%

**7.7.21** This paragraph has been mentioned earlier, see comments on 7.3.22

**7.7.22** Says:

*‘It is recommended therefore, on balance, to use the scenarios that derive labour demand from the CE 2022 Baseline, therefore discounting the Economic Development led scenario that is adjusted down to the LIP from the LIS, because there is still over-optimism in that scenario.’*

**7.7.23** This recommends the two middle scenarios:

- 2012 Census Adjusted
- CE Baseline Trend

**Table 7.1 (Page 96)** is incorrectly numbered, it should be **Table 7.13**

**Table 7.1: Summary of outputs for recommended scenarios**

	2021 Census Adjusted Standard Method	CE Baseline Trend
Housing need per annum	4,721	4,406
Total Dwellings 2040	394,978	389,306
Total Population 2040	932,148	918,763
Working Residents 2040	452,926	446,422
Workplace Workers 2040	460,268	460,268
Inward daily commuting	4,773	9,000
Improvement in Housing Supply (relative to demand)	9.9%	8.6%

## **PART C: Future Employment Land Needs, Affordable and Specialist Housing Need and Mix**

NNGO has no comments on these sections.

# ANNEX 1 – Comments on HRRs as part of our response to the Reg 18 consultation for the Oxfordshire 2050 Plan

## 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:

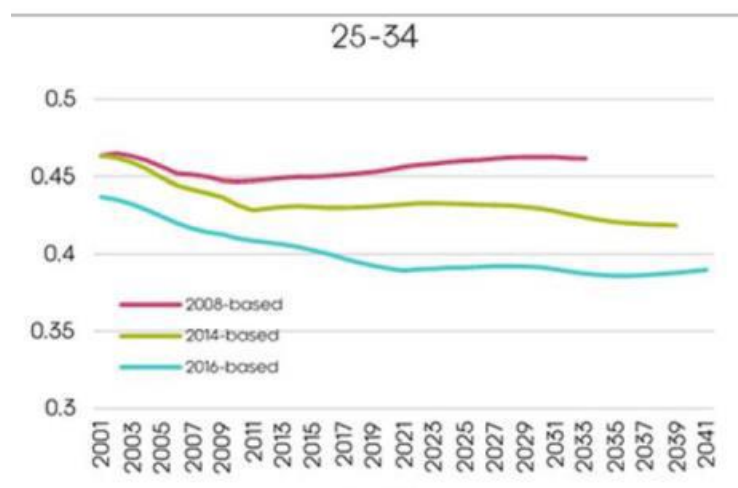
2014 based - Based on trends from the 1971 Census to 2011 (Page 40).

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

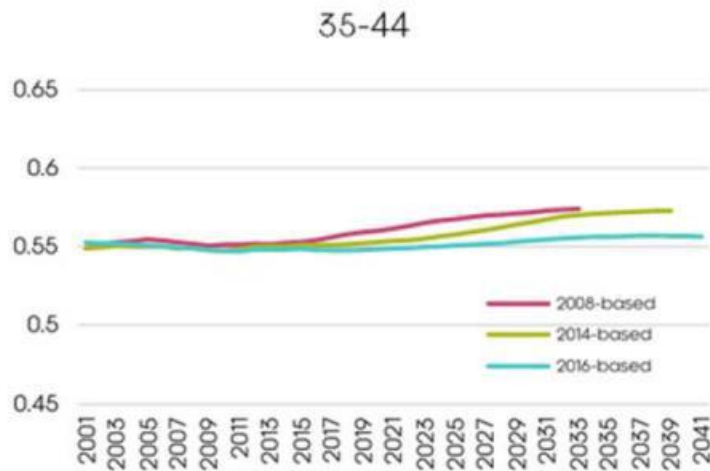
Figure 3.10.1 compares the HRRs resulting for 2008 based HRRs (a much earlier version) with the HRRs for 2014 and 2016 (2018 HRRs are not shown). For the 25-34 age group, changes in HRRs are as follows:



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 <sup>4</sup>
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 assumed to be easing, and affordability is increased.

South Oxfordshire District Council  
Development Control  
South Oxfordshire District Council 135  
Eastern Avenue  
Mitlon Park  
Abingdon  
OX14 4SB

**Our ref:** WA/2023/130351/02-L01  
**Your ref:** P22/S4618/O  
**Date:** 15 February 2024

Dear Sir/Madam

**Outline Planning Permission For Up To: 1. 1,450 New Dwellings (Class C3), 2. 120 Units Of Assisted Living Dwellings, With Ancillary Communal And Care Facilities (Class C2/C3), 3. 560 Sq.M Of New Community Use Buildings (Class F2), 4. 500 Sq.M Of New Commercial/Business/Service Buildings/Health Provision (Class E), 5. 2,600 Sq.M Of New Primary School (Class F1), 6. Creation Of Areas Of Green Infrastructure, Including Areas Of Open Space, Allotments, Habitats, Recreation Facilities And Public Park Areas, 7. Associated Transport, Parking, Access, Surface Water And Utility Infrastructure Works.**

**Full Planning Permission For: 1. Change Of Use To Class E And Associated Refurbishment Works To The Main Barn And 3no. Curtilage Barns At Wick Farm, 2. Change Of Use To Class F1 And Associated Refurbishment Works To The Wick Farm Well House Building, 3. Erection Of New Build Barn-Style Building (Class E), 4. Erection Of New Build Building Containing Back-Of-House Facilities For The Main Barn-Style Building (Class E), 5. Erection Of New Build Community Space Building (Class F2), 6. Associated Transport, Parking Associated With The Local Centre, Access And Utility Infrastructure Works, 7. Demolition Of Identified Buildings, 8. Associated Landscaping, Public Realm And Market Garden.**

### **Land North Of Bayswater Brook Near Barton**

Thank you for re-consulting us on the above application on 20 September 2023, following the submission of additional information and thank you for agreeing an additional timeframe for the provision of our comments.

### **Environment Agency position**

The additional information does not address our earlier concerns. We therefore **maintain our objections** set out in our response dated 27 July 2023 (reference: WA/2023/130351/01-L01). We recommend that planning permission should be refused on this basis.

Did you know that in the UK, 6.6 million tonnes of household food waste a year is thrown away? Almost three quarters of that is food which could have been eaten. Do your bit to avoid domestic food waste to fight climate change! [www.lovefoodhatewaste.com](http://www.lovefoodhatewaste.com) [www.wrap.org.uk](http://www.wrap.org.uk)

## **Objection in principle**

We object in principle to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone(s) in which the application site is located. In addition, the application is contrary to local policy STRAT13: Land North of Bayswater Brook as outlined in the Local Plan (South Oxfordshire Local Plan 2011-2035 (adopted December 2020)). We recommend that planning permission is refused on this basis.

## **Reasons**

Annex 3 of the NPPF classifies development types according to their vulnerability to flood risk and provides guidance on which developments are appropriate within each Flood Zone. According to your baseline model which was approved in 2022 (our reference: WA/2019/126608/08) this site partially lies within the 5% annual exceedance probability (1 in 20 year) flood event which according to your Strategic Flood Risk Assessment is Flood Zone 3b – Functional Floodplain.

The development is classed as **more vulnerable** in accordance with Annex 3 of the NPPF. Table 2: Flood risk vulnerability and flood zone ‘incompatibility’ of the PPG makes it clear that this type of development is **not compatible** with the Flood Zones in which the site is located and therefore should not be permitted.

Furthermore, the Local Plan Policy STRAT13 states that built development should be located in Flood Zone 1 only, with areas of Flood Zone 2 and 3 preserved as accessible green space. According to the modelling submitted by the applicant, part of the housing development is located in the pre-development 1% annual exceedance probability plus an appropriate allowance for climate change (1% AEP + CC) flood extent. This means that houses are being proposed outside of Flood Zone 1 (defined as land with less than a 0.1% chance of flooding in any given year). While construction of a 'development platform' effectively raises the houses higher than the 1% AEP+15% climate change flood level, the Environment Agency would still class this as built development in the floodplain. The post development modelling does demonstrate the houses are located in Flood Zone 1, but it seems that this is only due to the construction of the 'development platform'.

## **Overcoming our objection**

To overcome our objection, the applicant should clearly demonstrate that the proposed development is located outside of Flood Zone 3b – Functional Floodplain. The baseline 5% annual exceedance probability (1 in 20 year) flood event should be mapped onto a plan of the development to demonstrate that no ‘more vulnerable’ development is being proposed in Flood Zone 3b – Functional Floodplain. This includes any land raising to facilitate development.

In addition, the applicant should provide evidence to demonstrate that all built development is in Flood Zone 1 (i.e. that it lies outside of the baseline modelled 0.1% AEP flood extent), in accordance with local policy STRAT13: Land North of Bayswater Brook as outlined in the Local Plan (South Oxfordshire Local Plan 2011-2035 (adopted December 2020)). This may require the layout of the proposed development to be altered so that there is no built development outside of Flood Zone 1.

## **Objection 2 – Flood Risk Assessment**

In accordance with Policy EP4 of the South Oxfordshire Local Plan 2011 – 2035 (adopted December 2020) and paragraph 173 of the National Planning Policy Framework (NPPF), in the absence of an acceptable flood risk assessment (FRA) we

**maintain our objection** to this application and recommend that planning permission is refused.

### **Reasons**

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the modelling used to inform the technical detail in the FRA is not fit for purpose. Please see attached spreadsheet for full details; in summary:

- Mass balance is still outside of the modelling tolerance
- The model review has queried the conveyance, since some locations in the 1D model where there are structures have been modelled as open channel
- The Z shape file on the Elsfield lane is not properly attributed
- There is a query regarding the increase in peak flows in the model
- A combined blockage scenario to the culverts under Elsfield Lane should be considered

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA or Technical Note, and the modelling should be amended to address the points highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted.

### Sydling's Brook Mitigation – advice to Planning Authority

A volumetric-type floodplain compensation scheme is being proposed here due to various site constraints. The Environment Agency does not normally support volumetric compensation schemes since such schemes do not normally compensate for loss of floodplain storage at the higher levels, meaning that in more severe flood events adequate floodplain storage may not be provided. However in this case significant justification has been provided as to why true level-for-level compensation is not possible. We advise that it is for the local authority to determine in this case whether this option for the Sydling's Brook is an acceptable compromise while taking into account other planning considerations.

### **Objection 3 – Biodiversity**

The submitted planning application and associated documents indicate that physical habitat improvements to the Bayswater Brook, including reprofiling and channel creation and realignment will be required as part of the proposed development. Whilst we support the principle and objectives of such proposals, we do not have enough information to be satisfied that the proposed development can meet our requirements for the net improvement of ecology and physical habitats. In accordance with paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) and Policy ENV3 of the South Oxfordshire Local Plan 2011 – 2035 (adopted December 2020), we therefore **maintain our objection** to the proposal and recommend that the planning application is refused.

### **Reasons**

Whilst we welcome that there will be a commitment to provide enhancements to the Bayswater Brook, the information currently submitted does not adequately address our earlier concerns.

This objection is supported by paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and

enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

In addition, this objection is in accordance with Policy ENV3 of the South Oxfordshire Local Plan 2011 – 2035 (adopted December 2020) which states: Planning permission will only be granted if impacts on biodiversity can be avoided, mitigated or, as a last resort, compensated fully.

### **Overcoming our objection**

To overcome our objection, the developer needs to provide sufficient design and details of the proposed ecological enhancements to the Bayswater Brook.

Specifically:

- Analysis of the distribution of flows and levels under a normal and lower flow regime, especially in relation to the creation of secondary channels. It is the Environment Agency's strong preference that flow is not split between channels and that the newly created channels be appropriately designed to carry all flow and deliver river habitat net gain.
- Identify the low flow characteristics in the new and existing channels.
- Set out the outline design for the new channels and the physical habitat enhancements of the existing (including gradient, width, depth, bank connection and in-channel features).
- Provide an indicative plan to show the location and design of enhancements.

### **Objection 4 – Foul waste**

In accordance with paragraph 180 of the National Planning Policy Framework, we **maintain our objection** to this application as submitted because the proposed development would pose an unacceptable risk of pollution to surface water quality. We recommend that planning permission should be refused on this basis.

### **Reasons**

Paragraph 180 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

Oxford Sewage Treatment Works is a site of significant concern for the Environment Agency. In November 2021 the Environment Agency inspected Oxford STW, which led to Thames Water being issued with a Compliance Assessment Report (C.A.R.). Within this report, some serious and significant permit breaches were identified. While the site is non-compliant with its permit, the risk to the environment remains high.

Oxford STW was identified in 2017 as having insufficient Flow to Full Treatment (FFT) capacity for the population served. It was allocated a U\_IMP5 driver for the AMP7 investment period in order to realign the FFT. This was due to be delivered March 2025, however the EA understands this has been delayed by several years. The scheme and deadline are regulatory and legislative commitments, and failure to deliver it on time will potentially lead to further noncompliance at the site. It also presents a significant and

ongoing risk to the receiving waterbody, particularly from continued and extended periods of storm overflows. Adding additional flows to the STW before this scheme is completed is not acceptable.

An AMP7 investigation was carried out at Oxford STW to understand the impact of the sewage discharge on Dissolved Oxygen. The investigation concluded that a scheme should be included in AMP 8 (2025-2030) to improve the Dissolved Oxygen status in the Northfield Brook. This was not included in Thames Water's draft business plan submission in October 2023. Without this scheme, there will be an unacceptable risk to deteriorating the Dissolved Oxygen status under the Water Framework Directive (WFD).

Oxford STW suffers greatly from groundwater infiltration and has an associated Groundwater Systems Impacted Management Plan (GISMP). This is partly, but not entirely, due to the brick sewers close to the Thames. The infiltration within the catchment, alongside a complicated pumping regime put the entire network at risk of storm overflows or network failures during times of high(er) flows. Additional load within the network, without improvements, will lead to more storm overflows, pollution incidents and network failures.

### **Overcoming our objection**

The delivery of the AMP 7 scheme is vital to ensuring that Oxford STW has enough capacity to treat incoming flows. We also recommend that the STW is upgraded to meet the expected demands up to the end of the local plan period. Thames Water need to work with the Environment Agency to agree a scheme design, and a realistic and appropriate timescale. Thames Water also need to execute the recommendations of the 2021 CAR form and do everything possible to come back into compliance.

The AMP 8 Dissolved Oxygen scheme should be included in the final business plan submission. Furthermore, continued work on the GISMP to reduce the impact of infiltration in the network is essential.

### **Sequential test – advice to Planning Authority**

#### What is the sequential test and does it apply to this application?

In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and your strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test, which are consistent with the use for which the site was allocated.

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

### Who undertakes the sequential test?

It is for you, as the local planning authority, to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#).

### What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic flood risk assessment should allow you to do this yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

### **Exception test – advice to Planning Authority**

In accordance with the National Planning Policy Framework (paragraphs 164 and 165), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

The exception test should only be applied as set out in flood risk table 3 of the Planning Practice Guidance (PPG) following application of the sequential test. The exception test should not be used to justify the grant of planning permission in flood risk areas when the sequential test has shown that there are reasonably available, lower risk sites, appropriate for the proposed development.

In those circumstances, planning permission should be refused, unless you consider that sustainable development objectives make steering development to these lower risk sites inappropriate as outlined in PPG (ref ID: 7-033-20140306).

### Our role in the exception test

The exception test is in two parts, described in the NPPF (paragraph 164). In order for the test to be passed it must be demonstrated that

1. The development would provide wider sustainability benefits to the community that outweigh flood risk; and
2. The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Paragraph 165 of the NPPF makes clear that both parts need to be met for the test to be satisfied. It is for the applicant to demonstrate this.

We provide advice on the second part of the test, but it is for you, as the local planning authority, to consider the first part of the test, accounting for the findings of the flood risk assessment and our flood risk advice, and to determine whether the test, overall, has been satisfied. Development that does not satisfy both parts of the exception test should be refused.

Where the flood risk assessment shows the development will be safe throughout its lifetime without increasing flood risk elsewhere

Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, there will always be some remaining risk that the development will be affected either directly or indirectly by flooding. You will need to weigh these risks against any wider sustainability benefits to the community.

**Environmental permit - advice to applicant**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

**Other Consents – advice to applicant**

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

**Final Comments**

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us. **Subject to our flood risk objection being overcome, we have planning conditions we would recommend in regards to groundwater and contaminated land.**

**If you are minded to approve this application for major development contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the [Town and Country Planning \(Consultation\) \(England\) Direction 2021](#).**

**This statutory instrument prevents you from issuing planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the**



**opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing. A failure to follow this statutory process could render any decision unlawful, and the resultant permission vulnerable to legal challenge.**

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours faithfully

**Miss Chloe Alma-Daykin  
Planning Advisor**

Direct dial [REDACTED]

E-mail [REDACTED]