To: Planning at Oxford City Council

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**SUBMISSION TO CONSULTATION ON *Housing and Economic Needs***

This submission responds to a consultation on Housing and Economic Needs Assessment - <file:///C:/Users/Steve/Downloads/REPORT_Final_12.12.22.pdf>

The Cowley Area Transport Group is concerned particularly, but not exclusively, with planning failures to constrain traffic growth in Oxford. Since transport is a shared issue between Oxfordshire County Council, Oxford City Council and national Government, our range of consultation submissions reflects the spread of institutions involved in a transport system that is far from effective in implementing measures to address Climate and ecological emergencies, or indeed social justice. Having considered your Assessment, we are alarmed by the wide scope of its omissions and the limitations of its provisions and proposals. Questioning the Report’s gaps and doubtful assumptions, we note the following:

**Circular economy:** Whilst there appears to be some interest in the idea of a circular economy[[1]](#footnote-1) within County and City administrations, it does not appear in this assessment as a consideration. As a basic principle applied to housing, re-use of the existing built environment is a primary consideration in the delivery of new homes. There are, for example, about 5000 empty homes in Oxfordshire according to recent Government figures.[[2]](#footnote-2) Building new homes is very much a secondary consideration, especially given the small spaces in new homes and the poor standards of permissible new build in this country at present. A circular economy means using less newly-obtained physical resources to achieve housing goals. In short, the following are potentially available in Oxford: 636 empty homes,[[3]](#footnote-3) 2nd homes, private landlord properties in unsatisfactory condition, Air B&B properties with no permanent residents, long-term empty shops and offices, etc. Subject to the availability of Council, or housing association or other funds – e.g. from cohousing initiatives – re-use of buildings can occur through compulsory purchase or simply buying homes on sale. This is to meet actual need for very low-cost housing. We note the presence of empty brownfield sites in industrial estates and surface car parks which can have housing built above, around or right over them.

We urge the City Council to take note of a recent New Economics Foundation report on how to create council homes from private rented properties.[[4]](#footnote-4)

**Energy costs and origins:** Low energy costs are a housing need in relation to social justice, and bearing in mind low pay, pay which is not inflation-proofed and benefits well below subsistence level, energy costs do not get the attention needed in this Assessment. Renewable energy sources need to be part of sustainable retrofitting of buildings for homes, whether undertaken by the council or any other body. This may require a Special Planning Document for Oxford, in the absence of effective national legislation.

**Housing costs as a source of skills loss for Oxford, or Oxfordshire:** The excessive market orientation of this report, constantly emphasising the idea of the misleading term ‘affordable housing’ and also routes to new market homes, takes no account of the loss of skilled workers in Oxford due to high overall housing costs to buy or rent. No homes or private rents in Oxfordshire can be considered affordable – especially when food is up 17%; private rents in many places up 16% and energy bills may hit a £3k average for households in the next Budget.

The Assessment ignores the need to meet housing demand with very low-cost housing to ensure the full range of skills needed in each area is, eventually, available.[[5]](#footnote-5) We note this probably will not occur until the UK rejoins the EU, and a minimum wage of at least £15 per hour is introduced, but until then the very least any council in Oxfordshire can do is to maximise council housing from the existing built environment. Keyworker homes via shared ownership are made problematic given poor pay increases, if any, for keyworkers – e.g. in the public sector, stimulating current strikes. Even the mortgage part of such monthly payments a household may be obliged to make on a shared ownership home may be far too much in relation to current pay levels. It is much cheaper to obtain homes in many other parts of the country, if a person or household has transferable skills and is able to move.

**Housing as if water supply did not matter:** In 2023, the water catchments for Oxfordshire and Swindon reach capacity use. The Assessment does not mention water issues as a constraint upon housing. Regulations concerning water in new buildings or in retrofitting do not cover the essential step of re-using water from sinks, showers and baths to flush toilets. In a country with recorded declines in rainfall, assuming that water will appear as if by magic is a classic example of planning failure. The Met Office is expecting drought to have an impact this year, after an exceptionally dry winter.

**Pedestrianisation as a housing imperative:** Whilst the City Council in its Local Plan recognised, belatedly, a need to cut car parking to address awful traffic congestion and continuing air pollution in Oxford, there is no apparent recognition of: firstly, the fact that new build which is ‘car-free’ means more land which is available – above Oxford’s immense areas of car parks for example – for housing more people. This requires that such areas are strongly pedestrianised with limited delivery/essential vehicle access; and secondly, pedestrianised areas spreading from the existing tiny areas in central Oxford particularly can create more desirable areas to live and work which are low-noise, very low pollution zones with access to appreciable facilities in their vicinity. Shop owners benefit where footfall increases in areas with no traffic.

**External housing as a traffic problem:** The disastrous spread of housing to meet Oxford’s alleged needs on to the green Belt and greenfield sites at the periphery of the City and outside is an evolving traffic problem. With diminished bus services, and hyper-expensive rail fares, too many people commute by car into Oxford and worsen its appalling traffic conditions already. This is not considered sufficiently in the Assessment, just as building above, around or right over car parks is not given weight in its findings.

**Employment land needs:** The Report should have recommended, from such evidence as it does present, that every Council in Oxfordshire should be vigorously promoting remote working, flexitime and 4 day working weeks. Clearly, this will have implications for traffic movements for commuting, the actual scale of employment land needed - although brownfield sites are still present in Oxford on land already designated for employment - and may have implications for the alleged need for market housing in Oxford in particular. No one with a need for housing actually needs high house prices or astronomical private rents.

**Economic Growth:** We do not accept the need for conventional economic growth that is repeatedly emphasised in this Assessment. What is needed is a large set of environmental, social and economic indicators to measure the well-being of society. The literature on the limitations of the idea of economic growth as a primary and dominant indicator of societal well-being is vast, and neglected in the planning system as it is in this Assessment.[[6]](#footnote-6)

Focusing on some specific aspects of the Assessment:

p.10 – para 2.1.3 suggests the NPPF means pursuit of mitigation and adaptation to deal with the Climate Emergency. We note that whilst the County Council is at least discussing the development of an overall policy for adaptation, the City Council has so far shrugged off our attempts to encourage the development of an Adaptation policy for Oxford.[[7]](#footnote-7)

p.10 – para 2.1.4 ‘..need to conserve and enhance the natural, built and historic environment….’ However, tree preservation orders are not being vigorously applied in Oxford to stop new concreted over front gardens being the frequent type of site for mature tree removal. Also, the City Local Plan proposed building on green spaces and upon allotments. The problems of these contradictions are compounded by the enthusiasm of the City Council for dumping housing on green belt and greenfield sites at the fringes of the City and outside, as if this were environmentally responsible in terms of land use and in its failure to constrain further traffic growth. Constraints upon traffic introduced in Oxford such as CPZs and car free developments do not necessarily apply at all in other council areas nearby, meaning new rural communities may have higher car ownership and use than Oxford, and little local employment as jobs remain concentrated in Oxford in the south of the County.

p.12 – para 2.1.11 It is abundantly clear that wealthier areas with the best return for developers in terms of house prices are targeted for housing growth, regardless of environmental and transport effects, or actual housing needs. Worse, such growth ignores the using the existing built environment potential of towns and cities with a substantial reserve of buildings which could be the subject of sustainable retrofitting, as part of regeneration – and employment growth where needed. We do not need developer-led housing in Oxfordshire, nor do we need such resulting housing being bought by private landlords to permit super-expensive private rents. We need a strategic approach which offers regeneration in places in the country where it is most needed, not the hyper-expensive housing costs present throughout Oxford, and Oxfordshire. In this county, only very low-cost housing should be the subject of targets. We welcome rumours of abandoning general housing targets at a national level.

p.13 2.2.2 ‘sustainable economic growth’ is a tautology. Conventional economic growth uses scarce resources, can concentrate development where least needed, does not cultivate a circular economy, undermines rewilding, agriculture and nature conservation, is in general prone to worsen both Climate and ecological emergencies, and is remarkably poor at delivering necessary skills thanks to institutional faith in the dubious term ‘market signals.’ A circular economy is needed, one consistent with addressing the Climate and ecological emergencies systematically and rapidly year on year, embedded in issues such as reducing inequality of income and wealth and expanding the skills base of the country.

p.14 2.3.4 Productivity is a function of many things including whether the people providing it are well-rested, and relaxed rather than being amongst the many victims of commuting. Curiously, a section on productivity does not mention remote working, flexitime or 4 days weeks. A ‘response skill system’ is an opaque term. No Government has chosen to support education well enough to guarantee reducing skills shortages. Brexit has made things worse, as the Foreign Office shortage occupations lists demonstrate. There simply is not enough State investment in education and training at all levels.

p.14 2.4 Recovery in Oxford and elsewhere in the UK clearly relies in part on international conditions. Loss of about 15% of trade and some investment since Brexit clearly will not help; reductions in EU origin students won’t help either. But such conclusions as are drawn in this section are rather parochial. Also, the impacts of Climate and ecological emergencies, poor rates of pay and benefits, energy and food bill hikes etc are not considered.

p.15 3.1.5 Population growth above the national average, contributing to higher housing costs, is not a neutral condition or some kind of accident. In Oxford, with difficulty in holding on to nurses and teachers, hospitality industry shortages etc, more people put pressure on existing infrastructure and services which, with inadequate public investment especially since 2010, worsens overall conditions. We need some of this population growth ‘levelled-up’ to elsewhere in the country as part of general efforts to address inequality.

p.18 Table 3.7 It does not appear surprising that household formation in Oxford appears 6900 below 2014 projections in the 2021 census figures. Housing costs make Oxford difficult to move into, and difficult to live in. There simply is not enough very low-cost housing. A housing strategy bent upon retaining and attracting skills would need far, far more emphasis on council homes in particular. Using the vast reserve of public and private car parks for this seems apposite, as part of an effective response.

p.27 4.1.1 Market housing in Oxfordshire is not ‘affordable.’ For those in actual housing need both market rents and house prices are far too high. One effect of this is having households which might appear to have reasonable incomes seeing far too much monthly income going into housing costs. Add to this current food, energy and other cost of living pressures and that a wide range of income groups are being impoverished by private rents and mortgages. This means locally-based businesses are being deprived of appreciable income as large amounts of household income are diverted into housing costs. For those, who perhaps thanks to family capital, have been able to buy a home, there is also a typical Oxfordshire problem of very high costs in getting any form of construction work done.

p.32 4.2.27 This section notes the ‘house price-to-workplace’ earnings ratio. The latest data for 2021 obviously does not include the recent slippages in sales and home prices attributable to economic mismanagement. These ratios are 11 times earnings on average for Oxfordshire, with 12 in Oxford and 13.1 in South Oxfordshire. We consider this to be an example of the housing market as market failure, and the desirability of reducing the proportion of housing in the private sector, whether privately-owned or privately-rented, in the long-term. We feel Oxford City Council should agree this as a principle, then set out to use available resources and skills to make it so. This is, in part, a local economy building strategy as it will gradually allow people more flexibility in their household spending, instead of seeing so much available income disappear into housing costs.

pp35-38 section 4.4 Rental market. The private rental market is a market failure, with rents and associated charges and costs undermining household incomes and depriving businesses of incomes as too much household income is evaporating into housing costs. An objective must be to remove the worst-maintained private rented properties from the private rental market, with sustainable retrofits for these homes and as additions to council housing. Remaining private landlords should be subject to progressive increases in requirements with the objective of making such landlords into registered social landlords only, in the long-term.

pp39-53 Office and R&D market review: We note the significance of lab space over office space in Oxford, with the implication that more on-site presence may mean more use of cars for commuting when the staff involved are domiciled outside the City, or when this is convenient to them despite Oxford’s traffic congestion. We reiterate the need for remote working, flexitime and 4-day weeks to be promoted and adopted by employers to minimise traffic impacts of office/lab use. We would like to see Workplace Parking Levies in place throughout the County to encourage active travel and public transport use. However, further growth of lab space in Oxford should attract resistance through planning action if it is planned for greenfield sites. The use of available and suitable spaces for lab work in the existing built environment elsewhere in Oxfordshire should be a County wide strategic economic objective, as an attempt to spread useful employment in Oxfordshire. Further employment growth in Oxford is unsustainable if this means allocating more land to it. Such land, available as vacant plots in some industrial sites for example, is best allocated to high density, very low-cost homes. Key development sites, pp52-53, should be considered for more intensive use through the building of taller buildings to meet the demand for lab space, subject to any constraints needed on heights and with no increases in car parking in such locations.

p.68 Oxford and Oxfordshire do not have ‘growth needs.’ A Comprehensive range of indicators is needed to judge progress in improving the well-being of society. Some examples:

a) the number of teachers per pupil in primary and secondary schools

b) reductions in skills shortages of all kinds throughout the County

c) rewilding areas of the County to expand existing protected areas to increase annually

d) increases in commuting on foot and by bicycle

e) increases in use of bus and rail for commuting and other purposes

f) extension in the areas of pedestrianisation

g) re-use of the existing built environment for council housing units

h) increases in the number of cooperative start-ups in Oxfordshire, as a means of diminishing start-up capital costs and favouring local business formation in communities with out-commuting for work

i) restored peatland by hectare as a carbon storage contribution

j) reduction in council house waiting lists and expanding access to a wider range of people and households over time

k) improved water quality in all watercourses, each year

l) the number of teaching lecturers in HE institutions in relation to numbers of students, e.g. groups of no more than 15.

7.1.6 It is no surprise at all that housing delivery by market providers does not meet demand. It was never going to happen. Market providers want higher home prices per unit and have no intention of building to meet demand. Increasing very low-cost housing from the existing built environment and brownfield sites require that councils have far greater resources to counteract the damage to household incomes done through existing housing costs. Market housing is a market failure.

7.4.21 Net commuting inflows by car need creative action to reduce traffic movements. We think Electronic Road Pricing can help with this.[[8]](#footnote-8) We want this applied to the Oxford City Region, incorporating major access roads into Oxford and not just the City itself.

7.7.18 Higher housing need in places like Oxford depends upon a failure to recognise the economic needs of far poorer areas in the UK. The environmental and infrastructure pressures of surrendering to this myopic approach to ‘demand’ are obvious. The economic benefits of sharing some employment expansion into other areas are clearly going to include making better use of existing built environment opportunities and under-utilised infrastructure in those areas.

p.96 With regard to future employment land needs, we want to see containment of employment land on existing sites, and more intensified use of sites – but without additional car parking to discourage further traffic growth anywhere in Oxfordshire.

p.108 8.7.8 We do not wish to see allocation of more land to warehousing. Intensification of use of existing warehouse spaces is to be used instead, where absolutely necessary. We do want to see substantial expansion of cargo bikes and ecargo bikes for deliveries, making use of upgraded cycle tracks of appropriate width, and benefiting from actual cycle networks without the constant broken links cyclists encounter in so many locations.

p.111 9.1.1 We do not accept the customary usage and alleged meaning of the term ‘affordable housing.’ Market and private rental properties are too costly throughout Oxfordshire. Reduced housing costs would allow people based in the County to meet more of their aspirations for goods and services than they are currently able to do because of very high housing costs. It should be an objective of every council that housing costs be brought down. The economy should not be servicing the preferences of private developers as it has done since the arrival of Right to Buy in 1980. All households paying for housing costs at current private rents and mortgage rates are paying too much, with adverse local economic consequences.

p.113 9.2.5 ‘Savings and equity’ are not the only consideration when judging whether households can purchase a home. Other considerations include: debts, such as student loans; job security, where insecurity may well discourage purchasing a home even if resources are available at present; costs of maintaining a private home, or renovating once purchased, are a problem in Oxfordshire and there are skills shortages as a factor driving up labour costs periodically. Security of home via council housing has advantages including the council being the source of needed upgrades/repairs.

p.116 9.3.37 Fundamental weakness in the Assessment: ‘vacant homes’ have not been considered in its strongly market-focused observations.

p.117 9.3.8 The calculation of affordable housing need is not based upon an objective of securing very low-cost housing for a larger proportion of the population than is currently the case. This is partly about national funding, partly about local council priorities and partly about failures to protect those without inflation-proofed household income from rises in housing costs. People regarded as ‘housed’, in private rented accommodation for example, will generally have a need for very low-cost housing as private rents are exorbitant. But they are not part of assessing ‘affordable housing need’ as their status as private tenants may not make their need urgent enough to prompt action on their behalf, even if they are in receipt of help from a food bank or similar. Far more generous calculations of how very low-cost housing demand may be assessed are needed. If, as suggested above, the City Council believes about one fifth of private rented homes are not decent accommodation, then those in such ‘housing’ are clearly in need of very low-cost homes in decent condition.

p.121 9.5.8 Where households appear to have sufficient income to purchase a home, 2022-23 conditions may have eradicated this possibility: food and energy price increases and rent increases have all been significant in this period; pay increases have not.

p.125 9.6.3 Yes, emphasising our previous point, access to capital and to mortgages, may block home ownership which is over-emphasised as a goal throughout this Assessment when so many in Oxfordshire cannot afford to buy.

p.149 10.4.5-7 Bungalows are land-hungry forms of homes and cannot be justified. Flats with lifts are appropriate to meet needs for homes without stairs.

p.152 10.5.7 With increased numbers of older people, it is likely that the number of households without access to a car will tend to increase, which may prompt more use of mobility scooters and adaptations of buses. And fewer young people are choosing to learn to drive.[[9]](#footnote-9)

p.153 10.7.1 People with long-term health problems or disabilities may well have both mobility and housing problems, and problems in accessing adequate household income as benefits and pensions are extremely low in the UK. Adapted housing with very low cost may be necessary for people within this group, and special mobility needs are to be dealt with too. Mobility scooters, ebikes and ensuring all buses have good access and space arrangements for those with mobility issues are all parts of responding to transport needs for this group. If this group grows, due to people living longer, their needs are certainly going to require a larger overall response from statutory bodies.

p.158 10.9.4 We would like to see maximum effort to provide home adaptations to meet a change in needs rather than pressures to move upon individuals and households to already adapted housing. Apart from the social concern of moving away from people they know, accessing where they used to live for those moved for these reasons may be inherently difficult, may involve car use by themselves or others and given rise to a variety of costs they will be meeting rather than having them covered by a statutory body or charity.

p.163 10.11.1 Wheelchair users, and users of mobility scooters not mentioned here, need the support of regular research to update assessment of needs, including needs to adapt existing homes.

Pp169-171 Self- and custom-build We have reservations about this meaning low density homes within Oxford with high levels of car parking. As with other new homes, any initiatives of this kind should be car-free by covenant and have high density requirements. Best of all, joint initiatives (cohousing? Housing cooperatives?) should be pursued with groups to permit construction of low-rise blocks in suitable locations, e.g. in unoccupied industrial sites which are near to significant local facilities. We are surprised to see no mention of secure moorings increases in this Assessment, as another form of creating homes many find acceptable along Oxford’s (and Oxfordshire’s) waterways.

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1. SEE: Kate Raworth – *Doughnut Economics,* 2017. [↑](#footnote-ref-1)
2. <https://www.oxfordshirehomelessmovement.org/ohm-urges-better-use-empty-homes> [↑](#footnote-ref-2)
3. <https://www.oxfordmail.co.uk/news/23350971.oxford-empty-homes-campaign-tackle-cost-living-crisis/> [↑](#footnote-ref-3)
4. SEE: [https://neweconomics.org/uploads/files/NEF\_Beyond-new-build.pdf February 2023](https://neweconomics.org/uploads/files/NEF_Beyond-new-build.pdf%20February%202023). [↑](#footnote-ref-4)
5. We note serious shortages of many types of skills in the Foreign Office shortage occupation lists, e.g. <https://www.gov.uk/government/publications/skilled-worker-visa-shortage-occupations/skilled-worker-visa-shortage-occupations> & <https://www.gov.uk/government/publications/skilled-worker-visa-shortage-occupations-for-health-and-education> [↑](#footnote-ref-5)
6. See as examples: Douglas Booth – *The Environmental Consequences of Growth,* 1998; Herman Daly – *Beyond Growth,* 1996; Donella Meadows et al – *Limits to Growth: the 30-year update,* 2003; Donella Meadows et al – *Beyond the Limits: global collapse or a sustainable future,* 1992. [↑](#footnote-ref-6)
7. See: <https://www.catg.org.uk/reports/> - Adaptation to Climate Change in Oxford: transport and green spaces. (2nd edition). [↑](#footnote-ref-7)
8. See our report under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-8)
9. See: <https://www.theguardian.com/money/2021/may/22/cost-young-people-learning-to-drive-covid-driving-lessons-insurance> & <https://www.autoevolution.com/news/these-are-the-biggest-reasons-why-young-people-do-not-rush-to-learn-how-to-drive-171751.html> & <https://www.express.co.uk/life-style/cars/1729125/private-car-ownership-changes-vehicle-costs-warning-exclusive> [↑](#footnote-ref-9)