

To: Cabinet
Date: 13 April 2022
Report of: Scrutiny Committee
Title of Report: Oxfordshire Plan 2050

Summary and recommendations	
Purpose of report:	To present Scrutiny Committee recommendations concerning the report submitted to Scrutiny on the Oxfordshire Plan 2050.
Key decision:	Yes
Scrutiny Lead Member:	Councillor Liz Wade, Chair of the Scrutiny Committee
Cabinet Member:	Councillor Alex Hollingsworth, Cabinet Member for Planning and Housing Delivery
Corporate Priority:	All
Policy Framework:	Council Strategy 2020-24
Recommendation: That the Cabinet states whether it agrees or disagrees with the recommendations in the body of this report.	

Appendices
None

Introduction and overview

1. At its meeting on 01 February 2022, the Scrutiny Committee considered a report by Phillip Wadsworth on behalf of the Future Oxford Partnership, detailing the progress of the Oxfordshire Plan 2050, and in particular looking at responses to the most recent consultation exercise.
2. The Committee would like to give particular thanks to all those who attended: Councillor Alex Hollingsworth, Cabinet Member for Planning and Housing Delivery, Adrian Arnold, Head of Planning Services, and Rachel Williams, Planning Policy and Place Manager. In addition to the length of the meeting, the

Committee recognises the difficulty of presenting a report written and owned by another organisation.

Summary and recommendation

3. Cllr Alex Hollingsworth, Cabinet Member for Planning and Housing Delivery explained a number of the challenges relating to the report – that he was able only to give personal views rather than speaking on behalf of the Cabinet or other participating Councils, and the difficulty and importance of aligning the processes for producing and scrutinising the drafts of the Oxfordshire Plan.
4. Rachel Williams, Planning Policy and Place Manager introduced the report. She highlighted that the process to deliver a development plan was lengthy, particularly when engaging in novel, cross-Council working. The Committee had had limited opportunity to make changes to the Regulation 18 consultation document, but those suggestions made by the Committee had been included within the Council's response. The present work was to refine policy options, involving listening to views from the last round of consultation, building the evidence base and testing what was practical, feasible and deliverable. These would be drawn together into a draft Regulation 19 consultation document, which would be subject to further opportunity for Scrutiny. However, it might be better to engage at an earlier stage whilst the document was less fixed.
5. Given Scrutiny's consideration lasted for over two hours, the discussion was wide-ranging, taking in clarifications of process issues around the Plan and the most recent Regulation 18 consultation – particularly with regard to Scrutiny's interaction with it, and policy around housing density, location of growth, and the Green Belt, and other areas to be discussed below. In total, the Committee makes six recommendations. These recommendations coalesce around these two key areas: i) issues pertaining to consultation on the Oxfordshire Plan, and ii) issues around particular policies.

Consultation on the Oxfordshire Plan 2050

6. Much of the Committee's discussion focused on the usefulness of the consultation report. The form that the consultation report has taken, to present factually and transparently the totality of comments made as part of the consultation, has the benefit of being totally neutral. There is minimal engagement in the consultation report with what was said; instead the comments are allowed to speak for themselves. The potential for being accused of pre-judging decisions is minimised. Only afterwards the comments are logged are they then weighted up. However, this approach has a significant downside. In total, ten out of the thirty-two policy options and three out of the five spatial options provided no clear steer in the approach which should be taken, or views were fully polarised. The decision not to attribute comments to specific individuals or organisations may have been made so as not to distract from the import of the comments themselves. However, a consequence is that whilst all comments are presented equally, in the subsequent policy development stage they are not all

deemed equally valid. Making decisions where there are polarised views is a necessary part of developing a public strategy. However, it also obscures what, for many people is an important consideration: who is making comments, and whose comments tend to be accepted, and whose not? In particular, the Committee keenly felt that it was important to be able to delineate between the treatment of views of residents and those with other interests, particularly developers.

7. The Committee's suggestion to address this is the creation of a brief supplementary report for Cabinet to consider, focusing on those areas of disagreement within the consultation and who is arguing for what. The aim would be to bring greater understanding to the tensions between parties and the decisions made, thereby promoting greater transparency and accountability.

Recommendation 1: That the Council requests a brief supplementary report for Cabinet to consider that focuses on the points of contention within the consultation in order that members (and the public) can understand what the political choices are that Oxford City Council is faced with. Further, that the Council requests that the supplementary report identifies consultation responses by respondent type, so that members (and the public) can understand where particular respondents are pressing for particular policy choices

8. The Committee expressed concern that the consultation received only a total of 422 different responses. It is accepted that some of the respondents were organisations who speak on behalf of a larger number of individuals. Nevertheless, Oxfordshire is estimated to be home for approximately 700,000 individuals. This makes the response rate approximately 0.6%. As a further counterbalance to the fact that some respondents were organisations, it must be remembered that some were businesses also. It is not possible to give a precise number, but is safe to say that the engagement from individual Oxfordshire residents to the consultation was very low. The particular concern of the Committee is that the lower the participation, the less likely the responses are to be representative. Given that this is a plan which will shape the environment of the County for decades to come, ensuring all sections of the community are enabled to have input is critical.
9. A key problem perceived by the Committee for consultation on a plan such as this is the amount of knowledge and understanding it presupposes. A large volume of text is often a barrier in itself, let alone when their subject is technical. Simply presenting the document and asking the public to engage in consultation with it automatically excludes large numbers of people from having their voices heard.
10. The Committee accepts that with all its recommendations, the Council is only one of six partners in the production of the Plan, and that therefore the support of the Council is not sufficient on its own in seeing a recommendation put into practice. It also recognises that engaging and supporting a more demographically representative group of respondents will have consequences in terms of time and cost. Despite both these considerations, the Committee maintains the view that

on balance this so important a topic that it merits greater investment in getting a representative view from residents, and seeks that the Council work with its partners to see that this does happen in the future.

Recommendation 2: That the Council seeks to ensure that future consultations on the plan involve greater depth of consultation amongst a more demographically representative group of respondents.

11. Following on from the above, the report on the consultation references a focus group undertaken with support for participants to make their view known. The Committee does wish to recognise the positive engagement that there has been, and would like to see this developed further.
12. Based on its support for the approach taken in this instance, the Committee is particularly interested to hear the outcomes of the focus group. Indeed, on the basis of the higher investment in supporting attendees to reach an informed conclusion, the trust in the quality of responses by Members and the public may be higher. As such, the Committee would like to see the results by made publicly available and to be distributed to Members.

Recommendation 3: That the Council requests that the results of the focus group undertaken as part of the Regulation 18 Part 2 consultation be made publicly available and distributed to Members.

Specific Policy Suggestions

13. Policy option 03 in the Regulation 18 document which was put to consultation concerns water efficiency. It notes the importance of ensuring the balancing of water needs for communities, the natural environment and businesses. A lot of the discussion is on access to water and ensuring there is sufficient water available, with the Water Cycle Study informing the Plan. Ensuring access to water is one issue, but households and businesses rely on clean water. Growth to 2050 will put strains on the capacity of Thames Water to provide sufficient clean water, and will require investment to ensure there is sufficient capacity. This may be in hand, but the downside risks are of sufficient seriousness that the Committee wishes to raise its concerns to ensure that there is clear alignment between Thames Water's plans for investment in treatment works and those areas scheduled for growth.

Recommendation 4: That the Council works with partners to ensure there is alignment between Thames Water's future investment plans for water treatment works and those areas outlined in Oxfordshire for growth.

14. Policy option 16 concerns leisure, recreation, community and open space facilities. The section outlines the provisions in regards to strategic leisure provision. Suggested after the preferred policy option is an alternative, which adds to the existing proposals a policy to protect existing indoor and outdoor sports facilities and open spaces within the County. Given the importance of public space, particularly for those with less money, on physical health, mental health and wellbeing, the Committee is strongly supportive of this alternative

policy. Indeed, it would wish to see greater detail provided such that play areas, parks and nature reserves are explicitly included within this policy.

Recommendation 5: That the Council supports the alternative policy option for policy 16, but with an extended remit to include play areas and parks and nature reserves as well.

15. The Committee recognises that one of the key strategic priorities that the Council has been trying to ensure is embedded and prioritised within the Plan is the tackling of inequality and deprivation. Consequently, it does not ask for greater efforts in negotiations to see this reflected more strongly as it is understood that maximum effort has and is being put towards achieving this. Instead, the Committee makes a practical suggestion which seeks to make whatever is agreed more effective.
16. Inequality and deprivation are complex and entrenched issues, and a strategic response to them will necessarily need to cover a broad set of topics. The existing draft does not ignore these issues, covering, for example, job creation, housing numbers, air quality and skills and education needs. On the other hand, these are dispersed throughout the document. The Committee would expect that consolidating these topics into one section and explicitly looking at them through a specific lens reducing inequality and deprivation would have two benefits. Firstly, these topics have relevance beyond tackling inequality. Poor air quality, for example, impacts everybody. It just so happens that it impacts the poorest and most vulnerable more than others. Approaching them with this particular focus would frame and define them, pushing discussion and thinking of each one towards what the Council would see as higher priority considerations. Secondly, by amalgamating otherwise disparate topics makes much clearer their interactions and dependencies, allowing for a more joined up approach. The Committee understands that representations have been made to cut down the number of policies within the Plan; hopefully this existing position can be employed to further use to address more effectively one of the Council's key priorities.

Recommendation 6: That the Council seeks that current relevant policies are amalgamated into one dedicated policy of how the Plan will reduce inequality and deprivation.

Further Consideration

17. The Committee is extremely keen that there should be further discussion on this topic. Following the meeting a meeting between the Chair and Vice-Chair of Scrutiny, the Cabinet Member for Planning and Housing Delivery and relevant officers discussed how best to do this. On top of the all-member briefing on growth figures taking place earlier this week, Scrutiny will be requesting a report in either June or July 2022 where it will be asked its views on the broad proposals.

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Cabinet response to recommendations of the Scrutiny Committee made on 01/02/2022 concerning the Oxfordshire 2050 Plan

Response provided by Cabinet Member for Planning and Housing Delivery, Councillor Alex Hollingsworth

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<i>Recommendation</i>	<i>Agree?</i>	<i>Comment</i>
<p>1) That the Council requests a brief supplementary report for Cabinet to consider that focuses on the points of contention within the consultation in order that members (and the public) can understand what the political choices are that Oxford City Council is faced with. Further, that the Council requests that the supplementary report identifies consultation responses by respondent type, so that members (and the public) can understand where particular respondents are pressing for particular policy choices.</p>		<p>Oxford City Council, as with all the Councils who will need to consider the options for the 2050 Plan, will need to make policy decisions on all areas addressed within the Oxfordshire Plan. In doing so each Council will need to weigh up and take into account all the evidence that underpins the Plan, including the responses to each stage of consultation, sustainability appraisals and assessments of future need for housing and affordable housing. The hurdle for any formal Plan is that it passes the tests of soundness laid out in the NPPF, paragraph 35. The judgement that each Council will need to take is whether the proposed Plan passes those tests in all its policies; that includes testing policies that are the subject of polarised views and also those that are not. Reports put in front of Councils will need to explain the balance of views expressed through the various public consultations, but as part of a much wider assessment of the evidence that needs to be taken into account.</p>
<p>2) That the Council seeks to ensure that future consultations on the plan involve greater depth of consultation amongst a more demographically representative group of respondents.</p>		<p>It is crucial that as many different voices and points of view are heard in the production of the Oxfordshire Plan as possible to ensure that the best plan for the whole county is produced. The City Council will make the case for wide-reaching consultation using a range of tools to ensure everyone has the opportunity to get involved in the project, particularly those whose views are often not heard.</p>

<p>3) That the Council requests that the results of the focus group undertaken as part of the Regulation 18 Part 2 consultation be made publicly available and distributed to Members.</p>		<p>It is important that the results of all consultation exercises are reported as fully as possible, and that qualitative assessments are made as well as quantitative – the consultation is not a referendum. The City Council will ask for it to be published alongside the main consultation report.</p>
<p>4) That the Council works with partners to ensure there is alignment between Thames Water’s future investment plans for water treatment works and those areas outlined in Oxfordshire for growth.</p>		<p>It is important that the Oxfordshire Plan informs, and is informed by, the investment plans of service providers such as Thames Water. We will ask that the teams working on the Oxfordshire Plan and on the Oxfordshire Infrastructure Strategy engage with Thames Water on this basis, and will also do so with other statutory providers and public service organisations such as the NHS (ICS-BOB).</p>
<p>5) That the Council supports the alternative policy option for policy 16, but with an extended remit to include play areas and parks and nature reserves as well.</p>		<p>The Oxfordshire 2050 Plan is intended to offer a strategic level longer-term Plan that sits between the NPPF and individual Local Plans. It cannot contradict the NPPF, and it should not infringe onto the remit of Local Plans and Neighbourhood Plans. It is better that local policies on issues like parks and play areas be set locally, rather than have the 2050 Plan try to interfere with local priorities. The 2050 Plan should be limited to strategic level issues.</p>
<p>6) That the Council seeks that current relevant policies are amalgamated into one dedicated policy of how the Plan will reduce inequality and deprivation.</p>		<p>The City Council has been instrumental in ensuring that issues of inequality and deprivation are taken into account in development the Oxfordshire 2050 Plan. It is not currently clear that it would be better to have a single policy, which in a spatial plan might have limited leverage, as opposed to an overall objective leading to ‘golden thread’ through the whole range of policies in the Plan. The City Council will however continue to make the case that issues of inequality and deprivation are tackled head-on through the Oxfordshire Plan, in particular the</p>

		need to properly address the ongoing shortfall in affordable housing across Oxfordshire. The City Council will not support a 2050 Plan that does not include policies to improve rather than worsen the affordability of housing for current and future generations.
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