

Public speakers

30 November 2021

1. Helen Marshall, CPRE

We are grateful to the FOP Scrutiny Panel for agreeing to raise our concern that the public should be able to understand the decision-making process for the next steps of the Oxfordshire Plan 2050 and in particular how the number of homes to be built will be decided. We understand that the Regulation 19 public consultation will be Summer 2022 and that the draft consultation document will need to be signed off by all the local authorities shortly before this. However, by that stage, the document will be almost a fait accompli, having effectively selected and embedded a growth option and proposed spatial distribution. Other decisions, such as whether or not to work up a much needed policy on increased housing density, will also have been taken.

So, for the sake of clarity for FOP members, our specific question is: “Who is going to make the decisions on which direction the Plan should take, on what basis will these decisions be taken and how will this process be made transparent to the public?”

***Answer:** The decision on the policies to guide development as part of the Oxfordshire Plan 2050 will be taken by the five local planning authorities (the City and the four district councils) with consideration of national planning policy. This will be taken through formal decisions when they approve the draft Oxfordshire Plan 2050 for consultation, which is planned for July 2022. The principal Oxfordshire Councils will work together to assess the options and to reach a common position through discussion ahead of those formal decisions. Any decision will be taken following Scrutiny Committee consideration at the Councils in the normal way. Decisions will be taken in accordance with all relevant access to information legislation, requiring, for example, forward notice of decisions to be published etc.*

2. Ian Green, Oxford Civic Society

The recent Regulation 18 Part 2 consultation on the Oxfordshire 2050 Plan proposes three growth projections which could be used as the basis for assessing the scale of longer-term housing growth in Oxfordshire. These projections originate from the Oxfordshire Growth Needs Assessment (OGNA) which is a report prepared by consultants advising the Oxfordshire councils.

Unfortunately, there is widespread and deep public concern regarding the OGNA. This relates to the methodology and the overly technical nature of this very long report which results in it being inaccessible and opaque. Major civic groups representing many smaller groups throughout the county have responded to the consultation with criticisms of the OGNA.

We are asking for an independent review, which would provide: an assessment of the adequacy of the methodology; clear explanations of the effect of the choices that have been made in preparing the projections; and the effect on the resultant projections. Further public concern centers around the process by which the decision on the

number of houses to be built will be made. It is not clear how, when and by whom this decision will be made. We also recommend therefore that this process should be clearly explained.

Could you please support these recommendations - the proposed independent review need not delay the schedule of Plan preparation. In addition, a suitably commissioned review, ideally with input from civic groups on the terms of reference, would significantly contribute to building consensus behind the Plan and to a more meaningful Regulation 19 consultation.

Answer for questions 2, 3 and 4: *The recent consultation on the Oxfordshire Plan included a consultation on the draft Oxfordshire Growth Needs Assessment (OGNA). These documents outlined three different scenarios on the future housing need up to 2050. Officers are currently considering the responses to the recent consultation. To date 3830 responses have been logged from 420 individuals and organisations.*

The final selection of the housing target will be made through the formal decisions taken by the City and District Councils when they approve the draft Oxfordshire Plan for consultation. These decisions, which are planned for July 2022, will be taken following Scrutiny Committee consideration at the Councils. The principal Oxfordshire Councils will work together to assess the options and to reach a common position through discussion ahead of those formal decisions. The Oxfordshire Plan 2050 Advisory Group will be an important forum for discussion.

Following analysis of the consultation responses, the different options will need to be assessed against the agreed Oxfordshire Strategic Vision, the objectives of the Oxfordshire Plan, the National Planning Policy Framework and through Sustainability Appraisal. This process will take some time and a conclusion is unlikely this year. It is important to recognise that the consultation covered many other important areas, such as addressing climate change, improving environmental quality and creating jobs. We are very grateful for all of the responses that we have received on these and other topics.

The Future Oxfordshire Partnership cannot itself commission a peer review of the OGNA, as decision making powers relating to the Oxfordshire Plan lie with the city and district councils. Further, it is not appropriate to decide on this request at this moment as it is important that all of the comments made are properly considered before decisions are made on any of them.

3. David Young, POETS.

POETS (Planning Oxfordshire's Environment and Transport Sustainably) have welcomed the decision to produce a strategic Oxfordshire Plan 2050. However, we have serious concerns at this stage of the Plan process. I want to highlight two. First, is that whereas many of the Plan's aspirations (for instance on carbon reduction and biodiversity) are very welcome, there does not yet seem to be a realisation that they are simply not achievable at the high levels of growth being entertained.

Second, this is compounded by the Oxfordshire Growth Needs Assessment (OGNA). Far from meeting its brief for clarity of approach and assumptions, we do not believe the OGNA or its implications are able to be followed by those without very specialist knowledge. Better people than I have struggled to do this, but what is clear is that it

seems to be contrived to produce a range of extremely high growth projections, and that it is underpinned by unrealistic assumptions about in-migration to the County.

30 years is of course a long timescale. We are now at a point nationally where a number of fundamental assumptions (eg about the needs of the climate emergency and public health, or where and how people will live and work) are changing. Government responses will have to change – almost certainly much faster and further than they have already - on issues such as decarbonising transport, or levelling up. The government still continues to use out of date 2014 figures to set housing targets; this has been criticised by its own Office for Statistical Regulation – and will in any event need to be re-appraised when the 2021 census data starts to appear early next year.

Business as usual is not a sustainable concept in such circumstances – still less the sort of turbocharged ‘business as usual’ as implied by the OGNA. It is an unsound basis for decisions which will affect future generations in Oxfordshire. There are huge risks around climate change (both mitigating it and the ability of the county to adapt to that which is already inevitable), biodiversity loss, public health, infrastructure provision – and indeed blight.

In common with many other serious groups, POETS have called for a **Peer Review** of the OGNA. It is vital that the Future Oxfordshire Partnership commission this **now**. This should have minimal effect on the Plan Timetable, but failure to do so would be likely to undermine confidence in the plan process and the electorate’s faith in the ability of Councillors to represent Oxfordshire’s interests. POETS (amongst others) have offered to be involved. It is critical that Councillors are able to share a common understanding of the derivation and implications of the growth alternatives underlying the Plan. I am absolutely sure that this is not the case at the moment. On behalf of Poets, I ask

4. Will the FOP, at the earliest opportunity in order to avoid further delay to the timetable, commission a Peer Review?
5. Will the FOP liaise with civic groups to agree the terms of reference for this Peer Review?

Answer: As provided for question 2.

4. Ian Ashley, Need Not Greed Oxfordshire

NNGO very much welcomes the FOP Scrutiny Committee’s endorsement of the broad call for a Peer Review of the OGNA. We understand that some members may be concerned that such a review might lead to an increase in housing numbers.

However, we would anticipate that a Review would provide an assessment of the adequacy of the methodology; clear explanations of the effect of the choices that have been made in preparing the projections; and the effect on the resultant projections. In other words an informed critique of the work done, rather than a new set of figures, which would bring the conversation out into the open and support more robust decision-making. Surely this is worth pursuing whatever the outcome? Indeed, that is the basis on which some local civic groups are supporting the call for a Review.

NNGO’s own view is that a close study of the OGNA will reveal that every opportunity has been taken within it to make choices, sometimes very questionable ones, that arbitrarily increase the number of homes to be built. High housing numbers do little, in themselves, to solve the affordable housing crisis but simply exacerbate pressure on local

infrastructure, jeopardise the levelling up agenda and make meeting our climate and nature targets even more challenging.

Any decision to supercharge housing growth and encourage high levels of in-migration should be a *local* strategic choice. We note that previous decisions on this, such as the Oxfordshire Housing and Growth Deal, have proven unpopular with the electorate in 2019 and 2021, and are likely to feature strongly again in the May 2022 elections.

We are also concerned that the Peer Review should be commissioned as quickly as possible, in order not to introduce any unnecessary delay to the OP2050 process. We are aware that the formal report on the Reg 18 consultation process may not be available until next year but the substance of those responses must already be clear, and should not hold up a decision on this issue. Meanwhile, there is growing support for a Peer Review from a wide range of civic groups (attached here as an Annex).

So the Question – *Will you please initiate a review of the OGNA and consider very carefully how the Oxon 2050 plan can deliver the housing that Oxfordshire actually needs whilst helping to achieve net zero?"*

Annex: List of Civic Groups Supporting the Call for a Peer Review (as at 24.11.21)
Oxford Civic Society, Need not Greed Oxfordshire coalition (representing 37 organisations around the county), Oxfordshire Friends of the Earth, CPRE Oxfordshire, Cherwell Development Watch Alliance (CDWA), Oxfordshire Neighbourhood Plans Alliance POETS, Bioabundance, CIC, GARD, STARC, Wolvercote Neighbourhood Forum, Thame Friends of the Earth, Sustainable Woodstock, Low Carbon Oxford North, Chinnor Climate Action, Abingdon Carbon Cutters.

Answer: *As provided for question 2.*

5. Linda Ward

To support the preparation of the Oxfordshire Plan 2050, the Oxfordshire Councils have commissioned Cambridge Econometrics and Icen Projects to prepare the Oxfordshire Growth Needs Assessment (OGNA). Key strategic decisions on Oxfordshire's future growth needs will be based in large part on the OGNA. It is in the public interest to be assured that OGNA is fit for purpose. It is reasonable to ask for sight of the critical contributions and review performed by the commissioning Councils during preparation of the final document. The OGNA's 'fitness for purpose' is a matter of great concern to many. As such it is in the public interest to know:

1. the status and role of the two consultancy companies (Cambridge Economics and Icen Projects) commissioned to prepare the OGNA; and
2. the Council's input to drafting and internal review process which resulted in the final approved version of the OGNA.

My attempts to obtain this under Freedom of Information (FOI) have been repeatedly rebuffed. I am being shunted from Council to Council. Oxford City rejected my initial request for sight of drafts on the grounds that the final version had not been agreed. The Information Commissioner is currently considering a complaint.

Once the OGNA was published, I contacted Oxford County Council (acting for Oxon 2050 Team). [a council officer] sent a partial, holding reply. I understand that he has referred my request for a factually correct and complete reply to the internal review/ complaints department (we are at day 55 and counting – I am promised the investigation will be complete for Xmas). Since Oxon 2050 Team do not hold drafts [a council officer]

suggested I contact the individual councils. Hence on 16/11/21 I asked each of the 5 Councils to “provide me with copies of any draft OGNA reports (including partial reports) submitted by the contractors for review or discussion, including early versions. Please provide a copy of all versions, to which your council contributed, with track changes and comments enabled”.

West Oxfordshire District Council (WDOC/ FOI/001217) replied within 2 days (on 18/11/21). WDOC have confirmed that the partner Councils do hold the information required. It refused to provide the information citing FOI Act Section 43(2) Commercial interests. I am given to understand that “disclosure might prejudice pending or future negotiations the Council may be subject to”.

I trust the Partnership has a remit to help coordinate a positive and constructive response to public concerns. Hence I ask the Council Leaders to intervene to ask their respective FOI Officers to cooperate in meeting my reasonable request for sight of drafts that they hold. Failure to do so would send a very negative message, enforcing the feeling that I am being ‘sent round the houses’. Yet it is difficult to believe that the Partnership – deliberately or tacitly – would wish to endorse a conspiracy of silence surrounding the generation and provenance of the OGNA.

Question 1. Will the Partnership Council representatives confirm their commitment to the spirit of Freedom Of Information around the OGNA by undertaking to investigate and to ask their FOI Officers to cooperate to provide the requested information.

Question 2. Do you agree with WDOC’s contention that the Councils’ participation in drafting and approving the OGNA should be considered to be ‘commercially sensitive’ and potentially prejudicial to future council negotiations’. If so, on what grounds?

Answer: *All FOP members are committed to meeting their councils’ legal obligations when responding to requests for information, and we urge our officers to provide you with timely and appropriate responses to your particular request. We cannot go into very specific matters of detail here, as responses from individual authorities are a matter for those authorities and not for the partnership as a whole.*

6. Suzanne McIvor, Cherwell Development Watch Alliance

The notes of a recent meeting of the Future Oxfordshire Partnership Oxfordshire Plan 2050 Advisory Group (14/10/21) record: *‘The Group was informed that a potential Green Belt Review, more details of which had been set out in proposed policy 10 of the Regulation 18 consultation document, could only be commissioned at a county level and not done individually. Members mentioned their desire for this to be brought to the forefront, as a prominent issue. Officers highlighted that if there was to be a Green Belt review, it had to be transparent and robust. Therefore, a specification and remit for this work was being developed carefully. It was agreed by members that this would be discussed in further detail in future meetings.*’

The recent OP2050 [Oxfordshire Plan 2050] consultation document did, as mentioned above, include a proposed policy option 10 on the Green Beltⁱⁱ. However, completely contrary to what is suggested in the above notes of the OP2050 Advisory Group this policy did *not* set out details of a potential Green Belt Review - other than a reference to para 141 of the NPPF and theoretical statements relating to changes to Green Belt boundaries.

Instead the policy options concentrated entirely on enhancement of the Green Belt. If a review of the Green Belt is intended, as a starting point, this policy option is *anything but* transparent and robust. In fact it is very misleading. Nearly 20,000 houses are already

planned for the Oxford Green Belt as a result of boundary changes in recently adopted local plans. Any review is too late to change this. Under NPPF, '*plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period*' and any review makes a mockery of this. Also under NPPF, further Green Belt release should not be required within the lifetime of those plans. This means that, with regards to OP2050, any Green Belt release should really only be considered in terms of housing that might be required *after the early 2030s*.

Can the Future Oxfordshire Partnership clarify:

- Will there be a Green Belt Review?
- Why was there no explicit mention of this in the recent Regulation 18 Part 2 consultation?
- How can this be justified given the NPPF guidelines quoted above?
- How will the partnership ensure that any review of the Green Belt is done in a transparent way and is fully consulted on?

Answer: *Given the strategic nature of the Oxfordshire Plan, and its plan period up to 2050, Green Belt is an issue that needs to be looked at. The commissioning of a Green Belt study is being considered in order to make sure that the Plan has a comprehensive evidence base, and to help the Plan ensure that Green Belt boundaries remain appropriate up to 2050 and beyond. This would set an important context for subsequent Local Plan reviews.*

Plans are supported by evidence and new evidence is frequently commissioned at each stage of their development. Any new studies will be published as part of the next consultation stage in the normal way. Any Green Belt study will need to be consistent with the guidance in the National Planning Policy Framework.

i <http://democratic.whitehorsedc.gov.uk/documents/s53262/DraftMinutes141021%20Final%20Draft.pdf> (penultimate paragraph on page 3).

ii [https://assets.website-files.com/5f9978a71f4d1719b3f50dfb/610308fe7fed8c1126199404_OX2050%20-%20PLAN%20FULL%20TEXT%20V30%20\(23%20July%202021\)%20with%20para%20nos.pdf](https://assets.website-files.com/5f9978a71f4d1719b3f50dfb/610308fe7fed8c1126199404_OX2050%20-%20PLAN%20FULL%20TEXT%20V30%20(23%20July%202021)%20with%20para%20nos.pdf) (pages 71 – 74)