



Oxfordshire Plan 2050 – Statement of Community Involvement Consultation

Need not Greed Oxfordshire response

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

Comments on the Statement of Community Involvement (SCI)

- **Para 3 - Need to balance economic, environmental and social objectives and success criteria**

Paragraph 3 talks about sustainable growth, but the objectives and success criteria in the terms of reference, statement of common ground and scope focus solely on economic growth and relegate the critical environmental and social elements of sustainability to being issues that need to be evaluated and any harm mitigated; the three elements must be equably considered for any sustainable outcome.

Doing this would also enable the JSSP to be consistent with the findings of the Raynsford Review of Planning in England, whereby the wellbeing of people must be prioritised “within the overarching objective of sustainable development” and “aimed at making places of safety, beauty and resilience”.

- **Paras 6 & 8 – earlier work, eg the terms of reference and scope, should be re-evaluated in the light of stakeholder/community feedback.**

Much work is already ongoing – for example, the terms of reference, statement of common ground and scope of the Oxfordshire Plan have not been prepared with stakeholder or community involvement. In addition, the JSSP and other advisory groups having met several times, yet the SCI consultation will not be finalised and analysed until at least mid-January.

The SCI does not seem to provide for any re-evaluation of these further to stakeholder/community feedback. NNGO feels strongly that the omission of environmental and social success criteria at the earliest stages of the project will lead to significant problems in achieving a sustainable outcome for the Plan, and also how it can integrate with other national and subnational strategies. **We call for these key documents to be revisited and for the Growth Board to be open minded to change in these to be incorporated as new material evidence, including through this consultation, emerges.**

- **Para 9 - There must therefore be transparency about the scope of evidence bases and any hierarchy in how these are being analysed.**

NNGO accepts that other evidence bases than those received in consultation exercises must be considered, but *how* these different evidence bases are balanced and considered in the context of each other is important and could result in significantly different outcomes. Transparency about the scope of the evidence bases, and the weighting given to each of these in any subsequent consideration in effective dialogue with informed stakeholders and locally elected members could meaningfully and positively influence and inform these choices by the Growth Board and its appointed project board and team.

- **Para 10 – Transport should be an integral part of the Oxfordshire Plan, not considered separately. We also need clarity on future governance.**

It is disappointing that the current proposal is for transport issues to be taken forward separately through a new Local Transport Plan. In our view, transport is an integral issue to the Oxfordshire Plan and the issues, opportunities, constraints and funding should be considered as one. This was also challenged at the Oxfordshire Plan launch event and we ask the Growth Board to re-consider this approach as a matter of urgency.

Integration with the Local Industrial Strategy, Oxford-Cambridge Growth Corridor etc is unlikely to be easily feasible given:

- a) Lack of appropriate sustainability success criteria in the scope and Terms of Reference for the project
- b) Governance of these other strategies setting the agenda without any accountability to Oxfordshire communities in terms of mandate or consultation
- c) Potential for changing governance being imposed (as per the Government's response to the NIC Partnering for Prosperity Report)
- d) Timescales for the other strategies dictating the outcome of/restricting a coherent outcome of the Oxfordshire Plan.

- **Para 11 - Levels of growth should not be pre-determined or excessive, and the Plan must remain flexible**

We need to identify the level of growth that is needed, appropriate and deliverable for Oxfordshire, its communities and resources – not what will deliver an arbitrary and imposed 'growth corridor'. (See also Para 3 above.)

NNGO is also very concerned about announcements in December 2018 that the Department for International Trade is seeking global cash to fund a series of capital projects in the Oxford to Cambridge 'Arc'¹ at the MIPIM conference in Cannes in March 2019. Precisely what projects and financial deals are being offered to foreign investors? Why can't funding be found through more normal routes? What consultation has there been about any of this?

- **Para 12 and Fig 1 – the Government's 25 Year Environment Strategy is glaringly absent and should be included. We are sceptical about the two way arrows and remain concerned about how much of the Oxfordshire Plan will be dictated by other forces. Poor old local communities for whom all this comes down on them from above – only a one way arrow for them!**

In reality, none of the relationships with the JSSP will be meaningfully two way. The Local Industrial Strategy, Ox-Cam Corridor etc will dictate timescales and impose deliverables/reduce flexibility in options for the Oxfordshire Plan; the Plan strategy by its nature will affect the long term Local Planning by LPAs.

We note the lack of reference to the Government's 25 year Environment Strategy and call for its urgent integration and recognition in the project structure.

The only one way arrow is that which shows local communities and neighbourhood plans being subject to the Local Plans (and all of those above), further illustrating the restricted voice that community groups have in the process.

¹ Abingdon Herald 12 December 2018, Oxford Times 6 December 2018
http://www.mipim.com/en/homepage/?gclid=Cj0KCQiAxs3gBRDGARIsAO4tqq0oLBvRgngF0X9tpEJAC2PLStP6cN-67o49bDA6EpnUsOaid_eehrwaAkIbEALw_wcB

- **Para 18 – We need better, more flexible timescales for scrutiny. The concept of stakeholder panels has been discussed but needs to be formalised, or an alternative method developed to involve informed stakeholders.**

The "conduit" referred to elsewhere by leaders of councils/ reps on the Growth Board and advisory groups and the challenging timescales for the project does not allow for effective consultation with elected members (and them with their local communities) and thus the opportunity for meaningful ongoing dialogue and local voice in the process. Engagement and awareness by councillors is lacking, further hampering the process. Information shared at the launch event on 18 Dec 2018 implied that this is recognised and there are actions being taken to address this, such as councillor workshops. This would be welcome.

The timing for Scrutiny meetings also hampers effective dialogue and engagement, and prevents any effective critical friend role.

The mooted opportunity for panels that include informed stakeholders is welcome but has yet to be incorporated into the project structure.

- **Para 20 – The opportunity to comment is welcome, but this is different to engagement.**
- **Para 22 - This is welcome, and we are grateful for the invites to various environmental groups as well as NNGO**
- **Para 23 and table – We would like to register NNGO's interest in being involved in the scoping of the Sustainability Appraisal.**

The timescale is already under pressure and looks undeliverable, especially given the uncertainty around OxCam. This should be recognised and the deadlines re-considered, otherwise we risk seeing the most critical stage of the Plan – the early engagement period – being squeezed to the point of death.

In general, we feel that there is a risk of involvement being conflated with consultation.

Timescales are suspect; initial issues and options scoping could be considered to be part of this month's processes, but any decision on these, including how they should be interpreted and incorporated into any consultation in Feb/March 2019, made before this SCI consultation is analysed and debated would be illogical and inconsistent.

In terms of the preferred strategy and pre-submission consultations, we hope that there will be sufficient local authority led events to engage both councillors and local communities. Our concern is that restricted knowledge and representation by a few councillors is not providing sufficient opportunity for full engagement with either councillors themselves or their communities.

The timescales for the project are already at significant risk and the opportunity for delivering all these stages properly is at risk. NNGO calls for any opportunity, especially given the uncertainty around the Oxford-Cambridge Expressway, for the Oxfordshire Plan deadline to be pushed back to accommodate more effective evidence bases and consideration of integrated strategies (and thus also deliver the relationship advocated in para 12).

- **Para 25 – We need local councillor engagement and action, as well as electronic engagement.**

Electronic engagement and the development of the new website is welcome but should be accompanied by local councillor engagement and action. What additional reassurance can also be made that submissions will be meaningfully considered? There is significant risk that local community voice, including effective engagement of members, will be lost in this process.

The second half of the paragraph is confusing and suggests comments on this consultation only will be fed to LPAs as opposed to comments received throughout the JSSP process. This should be clarified.

- **Appx 1 - We would welcome NNGO's inclusion in the stakeholder list.**