

Democratic Services

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15 September 2020

SUMMONS TO ATTEND

MEETING: CABINET
PLACE: TO BE HELD VIA VIDEO CONFERENCING BECAUSE OF SOCIAL DISTANCING REQUIREMENTS AND GUIDANCE (see [note](#))
DATE: WEDNESDAY 23 SEPTEMBER 2020
TIME: 2.00 PM

Members of the Cabinet

Councillors: James Mills (Leader); Toby Morris (Deputy Leader); Jeff Haine; David Harvey; Norman MacRae MBE and Michele Mead

RECORDING OF MEETINGS

The law allows the council's public meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Officer know before the start of the meeting.

A G E N D A

- 1. Notice of Decisions at the meeting held on Wednesday 26 August 2020**
([copy attached](#))
- 2. Apologies for Absence**
- 3. Declarations of Interest**
To receive any declarations of interest from Councillors relating to items to be considered at the meeting, in accordance with the provisions of the Council's Local Code of Conduct, and any from Officers.
- 4. Participation of the Public**
Purpose:
To receive any submissions from members of the public, in accordance with the Council's Rules of Procedure.
- 5. Receipt of Announcements**
Purpose:
To receive any announcements from the Leader of the Council or Members of the Cabinet.

6. Flood Defence Work Framework of Contractors (Report of the Principal Engineer – [copy attached](#))

Purpose:

To approve the validation of the completed procurement exercise to renew the shared flood defence work contractors framework.

Recommendation:

That the renewal of the framework LOTS be approved, in accordance with the report.

7. Equality Policy (Report of the Business Manager Corporate Responsibility – [copy attached](#))

Purpose:

To provide detail on the legal obligations under the Equality Act 2010 and how the Council can comply as it continues to work in partnership, and recommend the adoption of an Equality Policy.

Recommendation:

That the Equality Policy 2020-2024 and Action Plan, attached respectively at Annex A and Annex B to the report, be approved.

8. Financial and Service Performance Report 2020-21 Quarter One and Budget Reforecast (Report of the Chief Executive – [copy attached](#))

Purpose:

To provide details of the Council's operational and financial performance at the end of 2020-21 Quarter One and enable Councillors to assess financial and operational performance.

Recommendations:

- (a) That the 2020-21 Quarter One financial and service performance be noted; and
- (b) That Council be recommended to approve additional Capital Slippage from budget year 2019/20 in the amount of £843,108.

9. Woodstock Infrastructure Delivery Strategy (Report of the Planning Policy Manager – [copy attached](#))

Purpose:

To consider whether or not Officers should proceed with the preparation of a Woodstock Infrastructure Delivery Strategy Supplementary Planning Document (SPD).

Recommendation:

That the content of the report be noted and it be agreed that **either**:

- (a) a minor addendum to the West Oxfordshire Local Development Scheme (LDS) be published to confirm that the District Council no longer proposes to prepare a Supplementary Planning Document (SPD) on the topic of infrastructure provision at Woodstock; or
- (b) the West Oxfordshire Local Development Scheme (LDS) should continue to include reference to a Supplementary Planning Document (SPD) on the topic of infrastructure provision at Woodstock but that a minor addendum be published to update the anticipated timescales for preparing the SPD.

10. Government White Paper "Planning for the future" (Report of the Planning Policy Manager – [copy attached](#))

Purpose:

To agree a response to the Government's White Paper: Planning for the Future.

Recommendation:

That the content of the report be noted, and the proposed response to the White Paper attached at Annex A to the report be approved, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.

11. Government consultation "Changes to the current planning system" (Report of the Planning Policy Manager – [copy attached](#))

Purpose:

To agree a response to the Government's consultation on changes to the current planning system.

Recommendation:

That the report be noted, and the proposed response to the consultation included at Annex A to the report be approved, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.

12. Consultation by England's Economic Heartland on a draft Transport Strategy (Report of the Planning Policy Manager – [copy attached](#))

Purpose:

To agree a response to the England's Economic Heartland (EEH) Draft Transport Strategy.

Recommendation:

That That the content of the report be noted, and the proposed response to the draft transport strategy attached at Annex A to the report be approved, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.



Chief Executive

This agenda is being dealt with by Amy Bridgewater-Carnall Tel: (01993) 861522
Email: democratic.services@westoxon.gov.uk

Note: Councillors will be sent an invitation to the meeting via Cisco Webex. Members of the public may view the meeting via [Facebook Live](#). A Facebook account is not required.

WEST OXFORDSHIRE DISTRICT COUNCIL

CABINET

Record of decisions taken at the meeting of the **Cabinet** held via video conferencing on **Wednesday 26 August, 2020** at 2.00pm.

PRESENT

Councillors: James Mills (Leader); Toby Morris (Deputy Leader); Jeff Haine, David Harvey, Norman MacRae MBE and Michele Mead.

Also in Attendance: Councillors Richard Bishop, Rosa Bolger, Jill Bull, Suzi Coul, Harry Eaglestone, Duncan Enright, Hilary Fenton, Ted Fenton, Andy Graham, Gill Hill, Dan Levy, Martin McBride, Kieran Mullins, Alex Postan and Harry St John.

Officers: Giles Hughes (Chief Executive); Frank Wilson (Executive Director, Finance); Mandy Fathers (Business Manager Operational Services); Maria Wheatley (Parking Manager); Keith Butler (Head of Democratic Services) and Amy Bridgewater-Carnall (Senior Strategic Support Officer).

29. NOTICE OF DECISIONS

RESOLVED: That the record of the decisions taken at the meeting held on Wednesday 22 July 2020, copies of which had been circulated, be approved and signed as a correct record.

30. APOLOGIES FOR ABSENCE

There were no apologies for absence.

31. DECLARATIONS OF INTEREST

There were no declarations of interest from Members or Officers relating to matters to be considered at the meeting.

32. PARTICIPATION OF THE PUBLIC

No submissions were received from the public in accordance with the Council's Rules of Procedure.

33. RECEIPT OF ANNOUNCEMENTS

33.1 Councillor James Mills

Councillor Mills made reference to the recent news that he would be stepping down as Leader of the Council at the Council meeting on 28 October. He took the opportunity to thank everyone for all the kind messages he had received. He also wanted to thank his fellow Councillors, officers and residents for being supportive over the years and for working alongside him.

Councillor MacRae wished Councillor Mills and his wife all the best for the future.

33.2 Community Activity Grants

Councillor Mead addressed Members and advised that the Council had been able to award some Community Activity Grants to some organisations which had shown initiative in adapting to a new way of working. The organisations included Dance Creative; a theatre company providing workshops online for younger people; Joss Searchlight; the Thomas Gifford Trust; and Homestart. Councillor Mead provided a brief summary of some of the

activities that the organisations would be providing which would support young and older residents alike.

33.3 Reporting of Fly-Tipping and Dealing with Third Party Contractors

Councillor MacRae explained that he had often directed residents to use 'Fix My Street' to report instances of fly-tipping. However, he wanted to take this opportunity to amend this message and encourage people to use the Council's website or telephone 01993 861000. He advised that there had been some problems with reporting using 'Fix My Street', with unclear responses and he felt that the form on the website would result in a much more direct response.

He also asked Councillors not to contact third party contractors directly in relation to Council business but to speak to the relevant Council officer. Officers needed to keep audit trails of communications and requests and dealing with them directly would avoid confusion and miscommunication.

In response to a query from Councillor Enright, Councillor MacRae advised that communications and requests should go directly to the appropriate team or relevant organisation including the County Council or Parish or Town Council. The system would also provide an appropriate response to the complainant and testing of the process had worked so far. However, if Councillors did encounter any issues, they were asked to contact Bill Oddy, Group Manager – Commercial Development.

Councillor Enright also queried the process for keeping up communications once casework was underway. Councillor MacRae confirmed that the desired route would be via the officer who had initially dealt with the enquiry.

34. APPROVAL OF LOAN TO RAMSDEN PARISH COUNCIL

The Cabinet received and considered the report of the Chief Finance Officer, which reminded it of the loan of £15,000 to Ramsden Parish Council which had been approved in February 2020, to be used towards the cost of renovating, repairing and improving the roof on Ramsden Memorial Hall, and explained that the Parish Council had now requested that the loan be increased to £80,000, because of an increase in the estimated cost of the scheme.

The report advised that Ramsden Parish Council was the custodial trustee of the Ramsden Memorial Hall and the roof of the hall was in need of essential repair and replacement. The last time work was carried out on the roof was in 1947.

The original budget for planned renovation and improvement works to the hall was estimated at £77,150 and the Council had approved a loan for £15,000 in February 2020 as detailed above.

As work began, it had soon become apparent that extra essential works were required on the hall, in addition to the original plan. The original budget and loan request was therefore insufficient to pay for the revised scheme and Ramsden Parish Council was seeking to increase the loan from the District Council from £15,000 (over 10 years) to £80,000 (over 15 years).

To date the original loan agreed in February 2020 had not been drawn-down by the Parish Council.

Parish Councils were required to obtain approval from the Secretary of State to borrow money. Approval was granted for the original loan, however, no loan would be given by the District Council until the Secretary of State had granted approval for the revised balance.

An alternative option available to the Cabinet would be to not support the scheme, however, this would be inconsistent with the corporate priority to work with communities to meet the current and future needs of residents.

Councillor Morris introduced the report and referred Members to the details relating to the age of the building and the level of work required. He reminded Members that this was a seventeenth century barn, originally converted in the 1940's and the roof had not had any repair work carried out for 73 years.

This was seconded by Councillor Mead who made reference to the high level of use that the building received from not just the local but also the surrounding community.

In response to a question from Councillor Enright, Councillor Mead advised that the costs had escalated due to the level of damage discovered when the roof was first removed.

Unfortunately, this had not been known until the work had started and the damage was more extensive than expected.

Councillor Mullins addressed Members and welcomed the positive approach afforded by Cabinet. The building in question was located in his Ward and the loan to repair this important asset would be very much appreciated by residents of the village and the local community.

Councillor Hill, the other Ward councillor, then expressed her support for the recommendation.

DECISION: That a revised loan to Ramsden Parish Council of £80,000 be approved, to be funded from capital receipts and on the terms outlined in the report.

REASONS: The additional loan would assist with essential repair works and the Council would be working with communities to meet the current and future needs and aspirations of residents.

OPTIONS: Cabinet could decide not to support the scheme.

35. COUNCIL TAX SUPPORT – COVID 19 HARDSHIP FUND 2020/21

The Cabinet received and considered the report of the Group Manager for Resident Services, which sought approval for the use of any surplus within the Council Tax Covid-19 Hardship fund 2020/21.

In the Budget on 11 March 2020, the Government announced a national £500 million Hardship Fund. The Government's expectation was that all working-age Council Tax Support claimants in 2020-2021 could receive a further discount of up to £150.00.

To achieve this Government had provided a Fund of £474,564 for the Council.

The Government had indicated that the fund should be allocated principally to "working age households" in receipt of Council Tax Support (CTS), both existing recipients and those receiving CTS through 2020/2021. This was because most CTS policies required working age households to pay a certain percentage of their Council Tax.

Based on Government guidance, the Council had awarded up to £150 to all those eligible accounts and would continue to award through 2020/2021 as new CTS claims were received and assessed.

There was an expected, but uncertain level of demand for CTS amongst many residents who may not have claimed before due to the current economic situation but as furlough was due to end, the demand could increase significantly. Estimates had been made on the likely

increase in CTS claimants and the table included at paragraph 2.3 of the report showed the increase, which was so far low. However, these numbers could significantly increase as more residents claimed Universal Credit.

There were a number of alternative options available to Members as detailed below and further details relating to the administration of those options was outlined at paragraph 7.2 of the report.

Councillor Morris outlined the report and was keen that assistance should be provided to help the most vulnerable residents in the District, who had been hit hard by the Coronavirus measures. He was pleased that the Government had provided the funding to allow Councils to support their communities and he proposed the recommendations as laid out.

This was seconded by Councillor Harvey who expressed how proud he was to be a Member of a Council which had provided support to people, residents and businesses in the area.

Councillor Enright thanked officers for the report and commended the Council for its behaviour during the Covid outbreak. He reminded Members that there would be months of hardship ahead for many families and residents and hoped that the Council would be able to retain its swift response and a sense of community cohesion.

Councillor Graham welcomed the report and also made reference to the uncertain future, job losses and tenancy difficulties. He queried how the work referred to in section 7 of the report would be rolled out and who would be taking responsibility for that. In response, Councillor Morris advised that this would be managed by the Revenues and Benefits service. He stated that he would contact the team to find out what their plans were moving forwards and would communicate this information to all Councillors in due course.

Councillor Postan stated that he was very pleased to see this action being carried out but reminded Members that Government funding was created using tax payer funding.

DECISIONS:

- (a) That the options set out in paragraph 7.1(a), (b) and (c) of the report be approved; and
- (b) That the Group Manager for Resident Services be authorised to consider and determine individual grant awards as detailed in paragraph 7.1(b) and (c).

REASONS: The proposal would support the delivery of excellent modern services whilst ensuring the financial sustainability of the Council, supporting and building prosperous and inclusive local communities and facilitating healthy lifestyles and better wellbeing for everyone.

OPTIONS: The alternative options were:

- a) Continue to award up to £150 to every new CTS where there is excess Council Tax to pay throughout this financial year (this is the intended principle of Government providing the funding);
- b) In December 2020 review expenditure and if there is forecast to be a surplus and then award an additional amount to all working age CTS recipients who have an excess liability of £150;
- c) Ring-fence a proportion of the grant funding to create a 'Council Tax Hardship Fund' to address those residents who are suffering severe hardship, whether they are in receipt of CTS or not. This would be an application process with evidence supplied to support claim and require a new Policy; and
- d) Ring-fence a proportion of the grant funding to create a 'Local Welfare' support fund.

36. AWARD OF CONTRACT FOR CLEANING AND MAINTENANCE OF PUBLIC TOILETS

The Cabinet received and considered the report of the Parking Manager, which sought agreement for the award of the contract for the cleaning and maintenance of public conveniences.

The council had 13 public convenience sites within the District, specified in Annex A to the report, which were cleaned and maintained under contract by Healthmatic. The current contract was due to end on 30 September 2020 and a procurement exercise had been completed to secure a new contract from 1 October 2020, for a period of three years.

The report advised that a procurement process had been carried out under OJEU, with an open tender method. The contract would benefit from economies of scale as it was a shared contract across the Districts of Cotswold and West Oxfordshire. The submissions had been evaluated 60% for quality and 40% for price. Quality criteria included assessment of the bidders' ability to meet the required standards, arrangements for management and supervision, approach to managing customer complaints, fleet arrangements, resilience and the approach to health and safety and sustainability.

The table at paragraph 2.2 of the report showed the percentage scores for each bidder, with the preferred bidder demonstrating high scores for both quality and price.

Councillor MacRae introduced the report and explained that the existing number of public conveniences would increase to 13 in due course so the contract provided for that number. For clarity, he stated that the public convenience at the Kilkenny Country Park was in the Parish of Brize Norton but for directional and satellite navigation purposes, its address was stated as Carterton. He was pleased that the evaluation had been carried out with an emphasis on quality before price. The winning contractor had shown a great willingness to take the contract on and the contract would result in a saving for the Council.

The proposal was seconded by Councillor Haine who reinforced the savings being proposed.

Councillor Harvey addressed Members and congratulated the Cabinet Member and team for a good report and excellent proposal.

Councillor Postan highlighted, that whilst it was important to ensure that the directions to a public convenience were accurate, it was also necessary to make it clear who was responsible for maintaining the toilets and which Parish they belonged to, should individuals need a problem resolving.

DECISION: That the contract for the cleaning and maintenance of public conveniences be awarded to Bidder A, the preferred contractor, for a period of three years effective from 1 October 2020.

REASONS: The proposals would ensure that all services delivered by the council were delivered to the highest standard and would help residents, businesses and communities to access the support they needed to ensure a high level of health and well-being.

OPTIONS: An alternative option was that the Cabinet could choose a different bidder but this would be contrary to officer advice and the tendering results.

The meeting closed at 2.28 pm

Leader of the Council



WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 6
Subject	Flood Defence Work Framework of Contractors
Wards affected	All
Accountable member	Councillor Norman MacRae, Portfolio Holder for the Environment. Email: norman.macrae@westoxon.gov.uk
Accountable officer	Laurence King, (Principal Engineer) Tel: 01993 861341 Email: laurence.king@publicagroup.uk
Summary/Purpose	Validation of completed procurement exercise to renew the shared flood defence work contractors framework.
Annexes	None
Recommendation	That the renewal of the framework LOTS be approved, in accordance with this report.
Corporate priorities	The framework assists with the delivery of a transparent procurement exercise, which will ensure value for money as well as ensuring only quality approved contractors are commissioned.
Key Decision	No
Exempt	No
Consultees/ Consultation	N/A

1. BACKGROUND

- 1.1. As part of good procurement practice and to ensure the Council is able to call off work in an efficient manner it is advised that repetitive short contracts are re-issued following a set criteria to ensure best value and transparency. That prompted the creation of the original flood defence contractors framework.
- 1.2. The original flood defence contractors framework ceased in 2019, at the same time that a procurement exercise was concluded to identify a list of the preferred contractors for the renewal of the framework.
- 1.3. To ensure transparency and avoid any risk of challenge it was decided that the new framework required validation by Cabinet before being implemented.
- 1.4. The framework consists of five LOTS:
 - LOT 1 – Reactive work of any description requiring a 2 hour response to any site across the districts.
 - LOT 2 – Reactive work across any of the districts that requires a response within 48 hours.
 - LOT 3 – Planned works in the public highway or footway.
 - LOT 4 – Planned works in third party land.
 - LOT 5 – Technical consultant, including commenting on planning applications with regard to drainage and flood risk.
- 1.5. All LOTS have attracted companies that meet procurement requirements.

2. MAIN POINTS

- 2.1. The respective LOTS have the following companies allocated;
 - LOT 1 – Amelio and Alliance
 - LOT 2 – Amelio and Alliance
 - LOT 3 – Alliance, MJ Church, Oxford Direct and Firmacore
 - LOT 4 – Amelio, Alliance and Firmacore
 - LOT 5 – Alliance, BMT and Capita property & Infrastructure
- 2.2. All stated companies have met the specifications set out by the Publica Procurement Team and several have previously completed flood defence works across the districts to a satisfactory standard (Alliance, Amelio and Firmacore).

3. FINANCIAL IMPLICATIONS

- 3.1. The use of a framework that has set costs for certain activities inevitably allows a much better forecast of required budgets and costs. In effect, the use of a framework saves money.
- 3.2. In contrast, sourcing a contractor at the point of need, inevitably allows for an inflated charge to be made to the Council due to the urgency of the need.
- 3.3. No costs other than officer time have been incurred in setting up the framework.
- 3.4. The terms of the framework state that there is not an obligation on the Council to award any work to the contractors if the need doesn't arise.

4. LEGAL IMPLICATIONS

- 4.1. The Council could be accused of a lack of transparency if work is awarded without a clear set of contractor competency standards being used to justify the award of work.

5. RISK ASSESSMENT

- 5.1. The Council has permissive powers to carry out flood defence work (not a duty) but if it wishes to use those powers, with the inevitable expenditure of taxpayers money, it needs to be able to justify its decisions on how money is spent which means that there is a reputational risk to the Council if procurement is not transparent and cost effective.

6. ALTERNATIVES/OPTIONS

- 6.1. The alternative would be to source contractors as and when required which could cause delays in the delivery of work and increase the cost to the Council due to the “call-out” charges that would be imposed.

7. BACKGROUND PAPERS

None.



WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 7
Subject	Equality Policy
Wards affected	All
Accountable member	Councillor Toby Morris, Deputy Leader of the Council Email: toby.morris@westoxon.gov.uk
Accountable officer	Claire Hughes, Business Manager Corporate Responsibility Email: claire.hughes@publicagroup.uk
Summary/Purpose	This report provides detail on our legal obligations under the Equality Act 2010 and how we can comply as we continue to work in partnership. Adoption of an Equality Policy is a good foundation to facilitate this.
Annexes	Annex A - Equality Policy 2020 - 2024 Annex B - Action Plan Annex C - Equal Opportunities and Dignity at Work Guide
Recommendation	That the Equality Policy 2020-2024 attached at Annex A and Action Plan at Annex B be approved.
Corporate priorities	Ensure that all services delivered by the Council are delivered to the highest standard Help residents, businesses and communities access the support they need to achieve their ambitions
Key Decision	No
Exempt	No
Consultees/ Consultation	None

1. BACKGROUND

- 1.1. The Equality Act came into force from October 2010 and imposes a duty on public authorities. The duty requires all public bodies and private bodies that deliver a public function, to consider the needs of protected groups when designing and delivering services. It ensures that public bodies consider the needs of all individuals in their day to day work, in shaping policy, in delivering services and in relation to their own employees.
- 1.2. The Equality Duty is also supported by specific duties, set out in regulations which came into force on 10 September 2011. The specific duties require public bodies to publish relevant, proportionate information demonstrating their compliance with the Equality Duty; and to set themselves specific, measurable equality objectives.

2. MAIN POINTS

- 2.1. The aim of this policy is to reduce any inequality and to ensure equality of opportunity both in providing services and as an employer. It aims to provide clear outcomes that intend to improve our approach to equality and diversity and aid in meeting our legal requirements and overall be a great place to live, work and visit.
- 2.2. The policy covers both the Council and Publica as to provide a comprehensive overview and action plan it needs to cover both the service provider and employer elements. As such it seeks to clarify Publica and the council's responsibilities in relation to the general Equality duty and the specific duty, specifically members will note that Publica's position on dignity in the workplace is included at [Annex C](#) of this report.
- 2.3. In order for the council and Publica to comply with its legal obligations a number of practices have been introduced or emphasised, this includes the use of equality impact assessments which should be used to inform decision making at all levels.
- 2.4. To enable us to record, monitor and track our progress three equality objectives were introduced within the 2017 policy. In reviewing the objectives it was suggested that these remain the same but that we provide updated detailed actions to support each objective ([Annex B](#)).
- 2.5. The non-legally binding working definition of antisemitism has been adopted and incorporated into the Policy.
- 2.6. The report and attachments are due to be considered by the Economic and Social Overview and Scrutiny Committee at its meeting on 17 September, and its comments will be reported as necessary.

3. FINANCIAL IMPLICATIONS

- 3.1. None

4. LEGAL IMPLICATIONS

- 4.1. The Council has a duty to comply with the Equality Act 2010 and Public Sector Equality Duty.

5. RISK ASSESSMENT

- 5.1. If the Council does not comply with the Act they could be subject to legal challenge.

6. ALTERNATIVE OPTIONS

- 6.1. Cabinet may decide not to implement the Policy but in doing so could put the Council at risk

7. BACKGROUND PAPERS

- 7.1. None



Equality Policy

2020

Version Control:	
Document Name:	Equality Policy
Version:	Version 1
Responsible Officer:	Business Manager - Corporate Responsibility
Portfolio Holder:	Leader of the Council
Approved by:	Cabinet
Date First Approved:	23 September 2020
Next Review Date	September 2022
Retention	6 months after policy review or replacement

Introduction

The Council is committed to ensuring that we, and Publica as the employer of many of our staff, treat everyone who lives, works and visits our districts with dignity and respect. We understand and respect that people are unique and have individual differences, we celebrate this diversity and encourage positive relationships between people with differing needs. The aim of this policy is to reduce any inequality and to ensure equality of opportunity both in providing services and as an employer. It aims to provide clear outcomes that intend to improve our approach to equality and diversity and aid in meeting our legal requirements.

The policy is intended to apply to both the Council and Publica. Where the words “we” or “us” appear, where the context permits this should be deemed to include both the Council and Publica.

Equality is the responsibility of every Councillor, employee and any other person or organisation employed or engaged by us. To ensure that we all understand our responsibilities all staff and Councillors are required to complete equality training and as part of any procurement or commissioning process we ensure that anyone who is engaged to provide services either has its own legally compliant equality and diversity policy/policies or commits to adhere to the policies that we have in place.

Our Legal Responsibilities - Public Sector Equality Duty (PSED)

We acknowledge and welcome our legal duties as set out within the Equality Act 2010 and will ensure that all legal duties are adhered to by using the legislation and national guidance as a framework to improve standards and be accountable to the people we serve. However, we are not only driven by legislation, our policy and the work we do goes further. We also make sure that no other group or individual is treated unfairly for any other reason, such as their social class, political beliefs, income levels, responsibility for dependants, appearance, geographical area (rural location) or criminal record. We are committed to ensuring that hate crime or domestic violence are not tolerated within our communities.

The Equality Act 2010 states that public authorities must comply with the Public Sector Equality Duty. The Equality Duty requires all public bodies and private bodies that deliver a public function, to consider the needs of protected groups when designing and delivering services. It ensures that public bodies consider the needs of all individuals in their day to day work, in shaping policy, in delivering services and in relation to their own employees.

The Equality Duty protects people from discrimination on the basis of the following nine protected characteristics;

- Race
- Disability
- Gender
- Gender reassignment
- Sexual orientation
- Marriage and civil partnership

- Age
- Religion and belief
- Pregnancy and maternity

Under the act we must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between different groups including those who share a protected characteristic and those who do not.

Having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
- Tackling prejudice and promoting understanding between different communities

Specific Duties

The Equality Duty is supported by specific duties which came into force in September 2011 and requires public bodies to;

- Set and publish specific, measurable equality objectives and review them at least every 4 years;
- Publish relevant, proportionate information demonstrating our compliance with the Equality Duty at least annually;

Public bodies must publish information to show that they consciously thought about the three aims of the Equality Duty as part of the process of decision-making.

Equality objectives and actions

To enable us to record, monitor and track our progress we have developed three equality objectives. Our equality objectives have been developed using evidence and information collected from various national, county and local sources; including Office of National Statistics data; county council data and local knowledge. The objectives as introduced in 2017 and reviewed in June 2020 are:

- Ensuring our employment practices are equal and fair.
- Improving access to our services.

- Understanding our communities and customers' needs.

These objectives form the basis of equality action plans.¹ These plans identify specific tasks that will support the achievement of the objectives. We will monitor, review and report on the progress against these plans at least quarterly.

Equality Impact Assessment (EIA)

An equality impact assessment involves assessing the likely or actual effects of policies or services on people with protected characteristics. It helps us to make sure the needs of the community are taken into account when we develop and implement a new policy or service, or when we make a change to a current policy or service. We constantly strive to deliver services that are easily accessible by all who need them, and to support people to participate in public life. The EIA will look at the overall policy or service and decide if it has a positive or negative impact on any particular group

An impact assessment will be carried out at the earliest opportunity and ideally before the service, policy or strategy is developed. This ensures that any impacts are clearly identified at the outset and provides an opportunity to mitigate any negative impacts. Depending on the extent of the policy or service it may be necessary to undertake a further assessment as the change is implemented so that any areas of concern can be identified and addressed quickly.

If the assessment identifies a negative impact on a particular group or sector of the community, where possible this should be eliminated, minimised or counterbalanced by other measures. An action plan to minimise, reduce or eliminate negative impact should be developed and kept under review. Help and advice will be provided by the manager responsible for corporate equality and diversity and where appropriate will have input from our legal and human resources departments. We will publish completed assessments on our website.

Antisemitism

We have also adopted the non-legally binding working definition of antisemitism: demonstrating our clear intention that no one should be treated unfairly.

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities”

¹ Actions plans can be accessed via the Council website

Employing, supporting and developing our workforce

We are committed to being a fair and supportive employer, developing the skills and talent within our workforce so that employees are able to deliver high quality services to everyone. To achieve this we will:

- Carry out recruitment fairly
- Provide training to employees so that they can implement this policy
- Treat all employees fairly, with dignity and respect at all times
- Tackle unacceptable behaviour in the workplace
- Provide employees with opportunities to influence the development of our policies and practice
- Reward all employees fairly and provide employment conditions which support them to do a good job
- Promote a good work-life balance and opportunities to work flexibly
- Support disabled employees by making reasonable adjustments

Our employment practice is guided by the principles of equality and fairness. This includes recruitment, terms and conditions, appraisals, learning and development, promotion and when ending employment.

As stated in our specific commitments, all employees and elected members should be treated with respect and dignity in the workplace. The Council will not tolerate unacceptable behaviour in any form.

Equality Information

The Equality Duty requires public bodies with over 150 employees to record information relating to employees who share protected characteristics. As the Council itself has less than 150 employees we are unable to publish this data without the possibility of compromising individuals anonymity. The Council will uphold its duty to protect an individual's right to privacy, and will not publish information that could identify an individual. Nor will the information be used to identify an individual or make a decision about them purely on the grounds of the information that has been provided in relation to their protected characteristics. All personal data will be processed in accordance with GDPR. However, the Council acknowledges the importance of the accessibility of workforce data and will therefore work with Publica to ensure that Publica records and publishes this data.

Gender Pay Gap

The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 require all organisations with 250 or more employees to publish data on the gender pay gap within each organisation. Like the workforce data the Council itself does not meet this threshold however, this data will be published by Publica.

Conclusion

This policy clearly sets out our legal duties and how we comply with the requirements. However, a policy is a very small part of embedding equality and diversity and we are committed to ensuring that everyone who lives, works or visits our district is treated fairly and with dignity and respect, by our actions as both a service provider and employer.

West Oxfordshire District Council Equality Action Plan 2020 - 2021

Outcome 1 - Ensuring employment practices are equal and fair

Number	Action	Due Date	Responsible Team	Progress Updates
1	Refresh equality and diversity policy to include further information regarding equality in practise.	September 2020	Corporate	Going to cabinet for approval in September
2	Work with recruitment team to introduce mandatory training for all staff	August 2020	Corporate / Recruitment	Rolled out - to date 63% of staff have completed the training
3	Work with corporate responsibility business manager to ensure equalities training is included in the member induction programme.	October 2020	Corporate	
4	Enhance communication and involvement with Cabinet Member by ensuring that there is regular opportunity to comment and provide feedback on the equality policy and procedures including the review of the action plan.	Ongoing	Corporate	
5	Ensure all relevant staff are aware of the requirements of when and how to complete an Equality Impact Assessments.	June 2020	Corporate	Completed - published on portal

Outcome 2 – Improving access to our services

Number	Action	Due Date	Responsible Team	
1	Implement the new regulations regarding virtual councils, ensuring that the public have access to ensure transparency in decision making	July 2020	Democratic services / Corporate	Completed
2	Continue to provide alternatives to self-serve, including sign posting to organisations which may be able to provide further support such as befriending services.	Ongoing	Client support officer	
3	Continue to provide support from particular groups, e.g. use of translation services including British Sign Language.	Ongoing	All departments	
4	Implement a new system for complaints which ensures that any which relate to equalities can be easily identified and actioned .	September 2020	Corporate	Completed

Outcome 3 – Understanding our communities and customer needs

Number	Action	Due Date	Responsible Team	
1	Improve the use of customer survey information in relation to equality and diversity issues.	Ongoing		
2	Explore the possibility of setting up local customer groups to understand the needs of different groups and developing a joint community consultations strategy.		All services	
3	Analyse and publish the population profile to all staff in order to gain a better understanding of our communities.	Annually	Corporate	
4	Work in partnership with GARAS to support Syrian refugees.	Ongoing	Customer enabling	
5	Support people to live independently in their own home for longer through the use of disabled facility grants	Ongoing	Customer enabling	
6	Enable 274 affordable homes to be delivered across the district	April 2021	Housing planning and regeneration	

Equal opportunities and dignity at work guidelines

Introduction

Our commitment

Publica and its member Councils are committed to ensuring that we treat everyone who lives, works and visits our districts with dignity and respect. We understand and respect that people are unique and have individual differences, we celebrate this diversity and encourage positive relationships between people with differing needs. The aim of these Guidelines is to reduce any inequality and to ensure equality of opportunity both in providing services and as an employer. They aim to provide clear outcomes that intend to improve our approach to equality and diversity and aid in meeting our legal requirements

The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer's unreasonable failure to provide an auxiliary aid or service to the disabled employee.

It is generally unlawful to discriminate directly or indirectly, harass or victimise a member of the public based on any of the protected characteristics in the provision of services, goods or facilities. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

Recruitment

We are committed to being fair and supportive employers, developing skills within our workforces so that employees are able to deliver high quality services to everyone. Equality and diversity is fundamental to both the recruitment process and the ongoing employment within the organisation. Publica and its member Councils are members of the National Disability Confident Scheme. As such we guarantee to interview all disabled applicants who meet the minimum criteria for any vacancy.

Dignity at work

Publica and its member Councils are committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting them up to fail or making threats or comments about someone's job security without good reason.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment would include: physical conduct ranging from unwelcome touching to serious assault; unwelcome sexual advances; demeaning comments about a person's appearance; unwelcome jokes or comments of a sexual or racial nature or about an individual's age; excluding an individual because they are associated or connected with someone with a protected characteristic, e.g. their child is gay, spouse is black or parent is disabled; repeated name calling related to an individual's religion or belief, ignoring an individual because they are perceived to have a protected characteristic (whether or not they do, in fact, have that protected characteristic), e.g. an employee is thought to be Jewish, or is perceived to be transgender; the use of obscene gestures; and the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person or relating to their actual or perceived protected characteristic, e.g. magazines, calendars or pin-ups.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has

the right to decide what behaviour is acceptable to them and to have their feelings respected by others. Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, e.g. sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

A single incident can be harassment if it is sufficiently serious.

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else from either Publica or your respective Council. You should tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the Publica or respective Council's grievance procedure [Bullying and Harassment procedure]. In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your Line Manager or with another Manager if necessary. Alternatively you can seek advice and guidance from your respective HR Business Member Councils.

All complaints will be investigated promptly and thoroughly. If appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or trade union official of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

Publica and its member Councils will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

Employees responsibilities

Every employee is required to assist Publica or its member Councils to meet their commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, Publica or its member Councils for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under Publica's or its member Councils Disciplinary procedure. Conduct of this type will often be considered gross misconduct which can lead to dismissal without notice.



WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 8
Subject	Financial and Service Performance Report 2020-21 Quarter One with reforecast position to the end of the current financial year
Wards affected	All
Accountable member	Cllr Toby Morris Cabinet Member for Resources and Deputy Leader Email: Toby.Morris@westoxon.gov.uk
Accountable officer	Giles Hughes, Chief Executive Tel: (01993) 861658 Email: giles.hughes@westoxon.gov.uk
Summary/Purpose	This report provides details of the Council's operational and financial performance at the end of 2020-21 Q1, and enables Councillors to assess financial and operational performance.
Annexes	Annex A – Quarter 1 Revenue Outturn and forecast 20/21 year end position by Service including releases from Earmarked Reserves Annex B – Additional 2019/20 Capital Slippage for approval Annex C – Council Priority report Annex D – Performance Indicator report
Recommendations	a) That the 2020-21 Q1 financial and service performance be noted; and b) That Council be recommended to approve additional Capital Slippage from budget year 2019/20 in the amount of £843,108.
Corporate priorities	Climate Action: Leading the way in protecting and enhancing the environment by taking action locally on climate change and biodiversity Healthy Towns and Villages: Facilitating healthy lifestyles and better wellbeing for everyone A Vibrant District Economy: Securing future economic success through supporting existing local businesses and attracting new businesses to deliver the economic ambitions of the Local Industrial Strategy Strong Local Communities: Supporting and building prosperous and inclusive local communities Meeting the Housing Needs of our Changing Population: Securing the provision of market and affordable housing of a high quality for a wide range of householders making their home in West Oxfordshire Modern Council Services and Sustainable Finance: Delivering excellent modern services whilst ensuring the financial sustainability of the Council

Key Decision	No
Exempt	No

I. BACKGROUND

- 1.1. Each quarter, the Council monitors its progress towards achieving its aim and priorities, service delivery and financial performance.
- 1.2. The Finance team has undergone a reforecasting exercise which involved in-depth discussion and review of the current position and future forecast by all of the Publica Business Managers. The emphasis on the revenue budget was to identify areas of expenditure that could be saved, boost income where possible but also to create a more realistic estimate of our final position this financial year.

2. FINANCIAL REPORTING – REVENUE

WEST OXFORDSHIRE DISTRICT COUNCIL - Budget Monitoring

Revenue Budget Monitoring 2020/21 - Quarter 1, 1st April 2020 to 30th June 2020
and Revised budget forecast for 2020/21

Service Area	Q1 position			Revised Budget Forecast			
	Profiled Budget £	Actual net (Income)/ Expenditure £	Variance (under) / overspend £	Original budget 20/21 £	Forecast adjustments to income £	Forecast adj. to expenditure £	Revised 2020/21 Forecast £
Democratic and Committee Services	414,254	380,674	-33,580	1,026,500	1,400	-159,800	868,100
Environmental & Regulatory Services	90,033	155,331	65,298	431,350	186,029	-15,270	602,109
Environmental Services	941,459	928,271	-13,188	7,035,116	240,808	73,400	7,349,324
Finance, Human Resources & Procurement	218,459	202,916	-15,543	856,300	0	-13,700	842,600
ICT, Change & Customer Services	998,534	996,950	-1,584	1,777,100	65,100	-12,400	1,829,800
Land, Legal & Property	133,631	136,437	2,806	905,240	64,025	-8,700	960,565
Leisure & Communities	-96,341	152,028	248,369	579,475	1,167,125	-59,200	1,687,400
Planning & Strategic Housing	205,590	277,156	71,566	709,260	0	9,000	718,260
Revenues & Housing Support	1,827,882	1,865,052	37,170	1,094,900	-41,000	-88,400	965,500
Investment Property and Retained Services	3,205,562	3,274,897	69,335	1,833,080	407,527	-5,000	2,235,607
Total cost of services	7,939,063	8,369,712	430,649	16,248,321	2,091,014	-280,070	18,059,265
Plus:							
Investment income receipts	-169,375	-154,925	14,450	-680,000	61,800		-618,200
Cost of services before financing:	7,769,688	8,214,787	445,099	15,568,321	2,152,814	-280,070	17,441,065

Forecast 20/21 budget shortfall		£
Original budget 20/21		15,568,321
Revised forecast 20/21		17,441,065
20/21 budget shortfall to be financed		1,872,744
Additional budget financed by:		
Add'l Govt (Covid) grant funding		-1,227,070
Lost income - refund from MHCLG		-1,107,376
Earmarked reserves released		-467,471
Budget forecast risk provision		929,174
		-1,872,744

- 2.1. The Q1 position shows the variance between the 2020/21 quarter one budget and the quarter one actuals.
- 2.2. The Revised Budget Forecast shows the expected full year position against budget.
- 2.3. The Forecast 2020/21 budget shortfall shows how we anticipate this budget shortfall will be financed.

- 2.4. A detailed review of all variances is provided, service by service, in [Annex A](#) (page 8) along with a table showing which Earmarked Reserves have been released as per the table above.
- 2.5. As expected, the 20/21 quarter one results show a variance to budget, mostly due to the Covid-19 pandemic. It has reduced the uptake of some fee earning services, required WODC to divert financial and staffing resources into community support and safety activities and meant that the first quarter of the year was not "business as usual". The variances are discussed in more detail in [Annex A](#) (page 8) which shows the results and the forecast by service area. It should be noted that the annual budget figures are sometimes distributed evenly across the year as opposed to aligned to the actual timing of activities which can distort variances.
- 2.6. Many areas have been heavily impacted, most notably:
 - 2.6.1. Environmental and Regulatory Services - a huge reduction in the requirement of fee paying services and activities due to Covid-19 means this department will fall short of budget. Budget targets have not been met for several years now even without Covid-19.
 - 2.6.2. Environment Services - similarly, fee earning trade waste activities have not been required and while household recycling has risen with more people at home, this shift has actually increased the cost to WODC.
 - 2.6.3. Leisure - the gap here is the absence of management fee income but a significant percentage of this (circa 71%) is expected to be recovered from MCHLG.
 - 2.6.4. Investment property - this is one of the hardest hit areas. While the first quarter shows relatively small losses, the pressure caused by Covid-19 on businesses has subsequently caused some high street chains to fail while other local businesses are struggling. Many have requested a deferral or even renegotiation of their rent.
- 2.7. Some areas have seen recovery though or have found savings to cover the shortfall:
 - 2.7.1. While Planning saw a huge dip in income in the first quarter, this has actually picked up since lockdown measures eased. They are ahead of budget at P5 and expect to reach their full year targets this year.
 - 2.7.2. Revenues and Housing support have had to house more people than expected this year, but they have also identified savings in their budget that have allowed them to cover these ongoing costs and more.
 - 2.7.3. IT has had to respond to the sudden and urgent requirement to facilitate remote working across the business but they have juggled licenses and found savings to accommodate this within their existing budget.
- 2.8. The Business Managers were asked to review their priorities with regards to capital expenditure and projects. With staffing resource stretched between day to day activities and additional Covid-19 related work, there is a need to focus on what the Authority has identified as priority, both in the Council plan and in the Recovery Workstreams. Some initiatives that had previously had money set aside in Earmarked Reserves were no longer relevant and £467k was able to be released back to General Fund. Based on the forecast above, £930k can be transferred to General Fund. This however should be ring fenced and seen as a provision for the risk in the full year forecast numbers and the ongoing funding gap in the MTFS.
- 2.9. Please note that included in the adjustments to Earmarked Reserves is an overspend on the recent Riverbank repair project.
- 2.10. The actuals above include invoices that have been raised but are as yet unpaid. This is most noticeable in trade waste, where many customers have already asked for refunds on annual bills, and commercial property income where some bills are overdue and others have been

deferred. This risk at the end of Q1 was well over a hundred thousand pounds and is increasing with time.

- 2.11. In Leisure, the deal proposed to the provider is that some of the support they receive will be repayable. If the provider is unable to recover their position and their business model is no longer viable then it is unlikely the Authority will see this money repaid.
- 2.12. It's also worth noting that there is currently no indication that the grants and fee income recoveries offered by the Government this year will continue next financial year which could leave a significant shortfall in our budget which would be primarily funded from the General Fund.

3. FINANCIAL REPORTING - CAPITAL

- 3.1. A full breakdown of the schemes for the year and expenditure at Q1 is attached at [Annex B](#). (page 13).

Changes to the Capital Programme:

- 3.2. The Capital Programme was also reviewed as part of the budget discussions with further items of 2019/20 Capital Slippage being brought forward for approval. These are net £843,108 due to £1,112k being released that had previously been set aside for the Carterton Leisure Centre. This is due to an underspend in a previous year.
- 3.3. Some projects are currently delayed so may not start until next year.
- 3.4. Due to large capital spend in previous years being funded from working capital, the Council will need to finance this year's capital work through external borrowing. Consideration should be given to this when determining whether to lend to third parties and at what rate the loans should be granted.

4. PERFORMANCE MANAGEMENT FRAMEWORK - PERFORMANCE REPORTING

- 4.1. A new Council Plan 2020-2024 was approved by Council in January 2020. Although reporting on progress against the four year Plan commenced this quarter, the main priority for the Council was its response to Covid-19, and the subsequent recovery work which will be closely aligned to the overarching priorities of the Council Plan.
- 4.2. A new performance management framework is being developed; a much broader framework than previous frameworks. It sets out six key strands of information on which assurance needs to be provided, with a key shift in focus from performance monitoring to performance management:
 - Business analytics and service assurance
 - Place based measures and comparators
 - Public Business Plan strategic actions
 - Council Plan priority actions
 - Project and programme management assurance
 - Risk and opportunity management
- 4.3. As part of the Business Analytics and Service Assurance strand, an initial review of performance indicators has been completed. Significant work is still required and it can be expected that the indicator set will flex as priorities change and gaps are identified.
- 4.4. This report is the first iteration of the newly styled service performance and council priority reports; they will evolve in line with the emerging Performance Management Framework as well as feedback from senior officers and Members.
- 4.5. A high level Commissioning Statement and the new performance management framework will be presented to Cabinet in October 2020. This will set out the relationship between Publica

and the Council and their respective responsibilities. Publica's Executive Director (Commissioning) is accountable to the Council for the services commissioned from Publica, and also for the services commissioned by Publica from third parties on behalf of the Council. Publica must ensure that it provides the necessary information to the Council so it can assess whether the commissioned services are being delivered in accordance with the agreed quality and standard. The Council's Chief Executive is responsible for reviewing and approving the information provided in this report prior to its publication.

4.6. The Council's Chief Executive has received a report on progress towards achieving the Council's priorities and service performance. He has assessed performance in line with the high level Commissioning Statement, and confirms that overall, services have been delivered to the agreed quality and standard; and he was pleased to note that work is progressing on some of the actions set out in the Council Plan. The Chief Executive has also noted the significant impact of Covid-19 on communities, customers, services, and staff, and draws attention to the following:

- When the nation went into lock down, a significant number of staff were redeployed to support our communities. The speed at which mechanisms were set up to deal with the response was impressive, for example the Community Help Hub, and the processing of business grants;
- Collaboration with our partners at a county-wide level was key to responding to the pandemic crisis; in particular, close coordination and good communication between the County, City and District Councils, with the NHS and OxLEP, to support vulnerable people and align programmes to support local businesses. Close partnership working with local communities and our partners will continue as the Council moves into the recovery phase;
- Many services have continued to operate without any visible reduction in service delivery. The majority of staff continue to work from home, enabled by robust ICT infrastructure and support. Some services have had to adapt and change the way that they do business which has been challenging but also presents opportunities for doing things differently in the future;
- The impact of Covid-19 on some services has been acute, and some services have had to cease operation, for example, our leisure centres were instructed to close. The Council agreed a financial package with GLL which has supported some leisure facilities to reopen on 25 July.

5. COUNCIL PRIORITY REPORT

5.1. During Q1, the Council's main priority was the response to Covid-19 and the commencement of the recovery phase; and this is the key theme running through this report. However, the Council has made progress on the actions in the Council Plan including work on the Climate Change strategy and Carbon Action plan, the Built Indoor Leisure Facilities and the draft Affordable Housing Supplementary Planning Document which is being consulted on over summer 2020. A full report is attached at [Annex C](#) (page 14).

6. SERVICE PERFORMANCE REPORT

6.1. On 23 March 2020, the nation went into lock down. A significant number of staff were redeployed to support local communities and businesses, while others continued to deliver services from home. Overall, many services have performed well with no visible reduction in quality or standard. A full report is attached at [Annex D](#) (page 28).

7. LEGAL IMPLICATIONS

7.1. None

8. RISK ASSESSMENT

8.1. None

9. ALTERNATIVE OPTIONS

9.1. None

10. BACKGROUND PAPERS

10.1. None

Annex A - Comparison of Q1 budget to actuals and revised 20/21 budget forecast

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
Democratic Services								
DRM001-Democratic Representation and Mgmt	55,410	57,401	1,991	148,400	0	0	0	148,400
DRM002-Support To Elected Bodies	103,125	90,619	-12,506	415,600	0	0	-50,000	365,600
ELE001-Registration of Electors	14,900	615	-14,285	59,600	1,400	0	-49,500	11,500
ELE002-District Elections	18,925	6,134	-12,791	75,700	0	0	-50,000	25,700
ELE004-Parliamentary Elections	97,018	97,018	0					
ELE005-Parish Elections	0	1,407	1,407					
ELE007-European Elections	43,451	43,452	1					
ELE008-Police & Crime Commissioner Elections	0	1,663	1,663					
SUP001-Administration	81,425	82,364	939	327,200	0	0	-10,300	316,900
Total - Democratic Services	414,254	380,674	-33,580	1,026,500	1,400	0	-159,800	868,100

Quarter 1: Restrictions due to Covid 19 in the first quarter of the year resulted in Members' travel and activities being restricted. This resulted in savings related to lower expenses and mileage claims.

Full year forecast: Expense and travel savings are expected to continue in the medium term and small budget savings related to printing, photocopying etc have been identified in SUP001. With planned elections postponed till next May, this is an area we would expect to see savings continue in - although this is dependent on when activity resumes.

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
Environmental & Regulatory Services								
BUC001-Building Control - Fee Earning Work	-42,150	-6,950	35,200	-167,400	106,389	-75,802	-11,600	-148,413
BUC002-Building Control - Non Fee Earning Work	17,025	17,699	674	68,500	0	0	-300	68,200
EMP001-Emergency Planning	-11,980	-11,395	585	6,700	0	0	0	6,700
ESM001-Environment - Service Mgmt & Supp Serv	26,525	23,116	-3,409	106,200	0	0	-2,500	103,700
PSH002-Private Sector Housing-Condition of Dwellings	750	0	-750	3,000	0	0	-500	2,500
REG001-Environmental Health General	0	7,691	7,691					
REG002-Licensing	362	989	627	2,650	20,350	0	-1,500	21,500
REG009-Environmental Protection	42,913	45,959	3,046	173,050	11,600	0	580	185,230
REG010-Noise Control			0	400	0	0	0	400
REG011-Authorised Process	-10,500	-13,364	-2,864	-10,400	-1,500	0	0	-11,900
REG013-Pollution Control	30,950	28,116	-2,834	123,800	0	0	-1,300	122,500
REG016-Food Safety	32,038	32,675	637	129,450	1,500	0	-650	130,300
REG021-Statutory Burials	625	5,215	4,590	2,500	0	0	2,500	5,000
TAC309-Other Trading Services - Markets	3,475	25,579	22,104	-7,100	47,690	-33,979	0	6,611
Total - Environmental & Regulatory Services	90,033	155,331	65,298	431,350	186,029	-109,781	-15,270	492,328

Quarter 1: This area is one of the most affected by Covid being primarily revenue driven. Market stall income, licenses and building control work are all short of target.

Full year forecast: While some areas of this budget are starting to recover, social distancing is still hampering other areas that involve testing and inspections. In addition to these constraints, the building control budget has been set at the same level for the past three years but has consistently failed to achieve its income target. Further consideration of this will be made ahead of next year's budget to determine why the target hasn't been achieved and whether it is actually achievable.

**Finance, Human Resources & Procurement
ICT, Change & Customer Services**

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
SUP003-Human Resources	43,875	37,231	-6,644	175,500	0	0	-6,000	169,500
HLD302-Miscellaneous Cash	0	6,135	6,135					
HLD313-Lease Cars	0	-301	-301					
SUP009-Accountancy	79,250	75,659	-3,591	324,600	0	0	-4,500	320,100
SUP010-Internal Audit	29,834	29,120	-714	94,200	0	0	-600	93,600
SUP011-Creditors	10,925	5,490	-5,435	43,700	0	0	-1,100	42,600
SUP012-Debtors	14,500	11,926	-2,574	58,000	0	0	0	58,000
SUP013-Payroll	14,925	12,129	-2,796	59,700	0	0	-1,500	58,200
SUP019-Health & Safety	7,625	7,739	114	30,500	0	0	0	30,500
SUP020-Training & Development	6,625	6,724	99	26,500	0	0	0	26,500
SUP033-Central Purchasing	8,675	8,805	130	34,700	0	0	0	34,700
SUP035-Insurances	2,225	2,258	33	8,900	0	0	0	8,900
Total - Finance, Human Resources & Procurement	218,459	202,916	-15,543	856,300	0	0	-13,700	842,600
SUP002-Consultation, Policy & Research	28,725	29,151	426	115,800	0	0	-800	115,000
HLD301-ICT Purchases	308,630	308,835	205					
SUP005-ICT	418,264	409,428	-8,836	787,200	0	0	10,500	797,700
SUP006-Telephones	24,250	33,016	8,766	7,000	0	0	3,000	10,000
SUP008-Reception/Customer Services	114,625	112,745	-1,880	461,400	0	0	-200	461,200
SUP014-Cashiers	3,125	0	-3,125	12,600	0	0	-7,600	5,000
SUP041-Business Solutions	64,950	70,519	5,569	263,400	0	0	0	263,400
TMR002-Street Furniture & Equipment	-1,200	-2,777	-1,577	-4,800	0	0	-1,500	-6,300
TOU002-Tourist/Visitor Information Centre	37,165	36,033	-1,132	134,500	65,100	-46,384	-15,800	137,416
Total - ICT, Change & Customer Services	998,534	996,950	-1,584	1,777,100	65,100	-46,384	-12,400	1,783,416

Quarter 1: These cost centres are predominantly fairly static administrative overheads and some apparent "savings" in the figures are in actual fact misalignment of budget phasing. It is worth noting though that in spite of the huge and unexpected demands made on IT with the overnight introduction of remote working, these costs have been managed and offset by other reductions so what looks like a relatively static result for IT is in fact a significant achievement.

Full year forecast: As discussed, the Support Services continue to work to keep spending in check and identify savings. The other variable here is the VIC which is currently closed. Discussions are underway as to the future use of these spaces and how to optimise their benefit taking social distancing into consideration. The Finance Business Manager has now left Publica and they are in the process of recruiting interim cover and a permanent replacement, both of which will impact this year's budget.

Land, Legal & Property

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
ADB301-3 Welch Way (Town Centre Shop)	19,131	15,444	-3,687	36,700	0	0	0	36,700
ADB302-Guildhall	-277	184	461	1,300	0	0	0	1,300
ADB303-Woodgreen	93,518	97,812	4,294	191,140	0	0	-4,500	186,640
ADB304-Elmfield	68,391	74,826	6,435	156,800	0	0	0	156,800
ADB305-Corporate Buildings	66,900	59,112	-7,788	510,500	0	0	-4,200	506,300
ADB306-Depot	-82,900	-74,016	8,884	-39,900	0	0	0	-39,900
LLC001-Local Land Charges	-40,150	-36,896	3,254	-160,600	50,000	-35,625	0	-146,225
SUP004-Legal	32,368	21,027	-11,341	244,300	0	0	0	244,300
TAC303-Swain Court & Newman Court Ind Est Witney	-23,350	-21,056	2,294	-35,000	14,025	0	0	-20,975
Total - Land, Legal & Property	133,631	136,437	2,806	905,240	64,025	-35,625	-8,700	924,940

Quarter 1: Legal services have an underspend as there have been no external legal services (e.g. barristers) engaged in the period.

Full year forecast: There is a forecast shortfall in land charges due to the lower volume of house moves caused by the current Covid situation. While some recovery has been seen in this, we expect the full year picture to fall short of target. Small savings have been identified in equipment purchases. There is current uncertainty about the medium to long term future of the in-house legal service and this could impact the current year budget.

Leisure & Communities	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
CCR001-Community Safety (Crime Reduction)	8,200	2,139	-6,061	157,900	0	0	0	157,900
CCR002-Building Safer Communities	-18,110	-20,037	-1,927	3,700	0	0	0	3,700
CCT001-CCTV	-15,125	-14,794	331	122,400	0	0	-10,000	112,400
CSM001-Cultural Strategy	27,175	24,550	-2,625	109,300	0	0	0	109,300
CUL001-Arts Development	39,225	39,512	287	97,400	0	0	0	97,400
ECD001-Economic Development	33,350	36,064	2,714	134,400	0	0	-29,400	105,000
OPS003-Countryside	1,075	990	-85	4,400	0	0	0	4,400
REC001-Sports Development	-9,075	-11,443	-2,368	56,100	42,900	0	0	99,000
REC002-Recreational Facilities Development	14,950	9,719	-5,231	60,400	0	0	0	60,400
REC003-Play	13,275	13,724	449	44,000	0	0	0	44,000
REC301-Village Halls	3,300	3,349	49	13,300	0	0	0	13,300
REC302-Contract Management	-266,681	0	266,681	-513,425	1,124,225	-793,885	0	-183,085
SUP016-Finance - Performance Review	25,175	25,045	-130	101,000	0	0	-800	100,200
TOU001-Tourism Strategy and Promotion	46,925	43,210	-3,715	188,600	0	0	-19,000	169,600
Total - Leisure & Communities	-96,341	152,028	248,369	579,475	1,167,125	-793,885	-59,200	893,515

Quarter one: Leisure has been an area of particular focus with ongoing negotiations with the leisure manager (GLL) continuing through the first half of the year due to govt restrictions on the opening of the leisure centres. No management fee income for the first quarter has been paid and this amounts to £210k. The fees rise in July and the budget has been phased evenly so the remainder of the £266K loss shown in Q1 is simply budget misalignment.

Full year forecast: The impact here continues to be the ongoing negotiations with the leisure operator. There is a full time post they were due to fund which they will not be funding this year but the majority of the losses forecast above relate to their contract management fees. The losses around these are being covered in part (circa 71%) by refunds through MHCLG which hugely reduces the impact. There is no current indication that there will be funding to help this situation in 2021 though so this presents a very significant risk to next year's budget and the MTFs if the centres are still forced to operate with too many restrictions next year. The support for the operator is still being agreed but there is realistic hope that payments beyond the impact shown above will be repayable by the operator out of future surpluses.

Planning & Strategic Housing	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
DEV001-Development Control - Applications	-109,525	-76,610	32,915	-425,600	0	0	0	-425,600
DEV002-Development Control - Appeals	19,125	19,158	33	76,900	0	0	0	76,900
DEV003-Development Control - Enforcement	38,825	39,153	328	156,000	0	0	0	156,000
ECD301-WOSP - West Oxon Strategic Partnership	0	4,013	4,013	0	0	0	9,000	9,000
ENA001-Housing Enabling	36,300	34,493	-1,807	145,900	0	0	0	145,900
ENI301-Landscape Initiatives	22,090	32,064	9,974	89,460	0	0	0	89,460
HLD315-Growth Board Project (Planning)	5,250	30,831	25,581	21,000	0	0	0	21,000
PLP001-Planning Policy	95,325	97,244	1,919	336,000	0	0	0	336,000
PLP003-Implementation	14,100	14,311	211	56,700	0	0	0	56,700
PLP004-Conservation	21,500	21,366	-134	86,600	0	0	0	86,600
PSM001-Planning Service Mgmt & Support Serv	62,600	61,131	-1,469	166,300	0	0	0	166,300
Total - Planning & Strategic Housing	205,590	277,156	71,566	709,260	0	0	9,000	718,260

Quarter 1: The budget variance in this section is driven by the huge drop off in application fee income during lockdown. At the end of Q1, income was £50K short of budget. The variance in the Growth Board Project is mainly down to timing differences in recharges to other LAs.

Full year forecast: July and August have seen an increase in applications which by P5 have given this cost centre a £150k favourable variance to budget. The Business Manager is forecasting that this will settle again and by year end the original budget will have been met.

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
Retained Services								
COR002-Chief Executive	72,295	65,967	-6,328	291,280	0	0	-50,000	241,280
COR003-Corporate Policy Making	16,325	16,570	245	66,900	0	0	0	66,900
COR004-Public Relations	6,550	738	-5,812	26,200	0	0	-5,000	21,200
COR005-Corporate Finance	-13,525	-13,438	87	154,900	0	0	50,000	204,900
COR006-Treasury Management	6,300	1,463	-4,838	25,200	0	0	0	25,200
COR007-External Audit Fees	5,750	-1,382	-7,132	57,000	0	0	0	57,000
COR008-Bank Charges	17,300	31,026	13,726	69,200	0	0	0	69,200
COR302-Publica Group	750,467	750,559	92	174,400	0	0	0	174,400
FIE341-Town Centre Properties	-233,625	-229,463	4,162	-609,200	184,402	0	0	-424,798
FIE342-Miscellaneous Properties	-361,650	-358,799	2,851	-832,000	65,225	0	0	-766,775
FIE343-Talisman	-626,975	-563,496	63,479	#####	138,675	0	0	#####
FIE344-Des Roches Square	-267,550	-265,805	1,745	-499,100	0	0	0	-499,100
FIE345-Gables at Elmfield	-16,800	-19,562	-2,762	-33,600	8,400	0	0	-25,200
NDC001-Non Distributed Costs	4,044,775	4,044,600	-175	4,599,100	0	0	0	4,599,100
TAC304-Witney Industrial Estate	-74,475	-68,379	6,096	-160,000	10,825	0	0	-149,175
TAC305-Carterton Industrial Estate	-108,900	-106,400	2,500	-217,800	0	0	0	-217,800
TAC306-Greystones Industrial Estate	-7,825	-9,302	-1,477	-16,000	0	0	0	-16,000
TAC308-Other Trading Services - Fairs	-2,875	0	2,875	-4,000	0	0	0	-4,000
Total - Retained Services	3,205,562	3,274,897	69,335	1,833,080	407,527	0	-5,000	2,235,607

Quarter 1: The largest variance in the Q1 figures relates to the Talisman Centre. Unit 13 has been empty for over a year and the lost rental is £53K in the first quarter plus rates that the Council are liable for in the absence of a tenant. Capital spend has been approved to repair the roof and the hope is that this will encourage occupancy, although the current Covid situation has made property rental more difficult.

Full year forecast: While the first quarter is down against budget the reality is that the Covid impact on commercial property is serious and the expectation is that things will get worse in the short to medium term. Many tenants are asking for deferred rent or to renegotiate their rental basis altogether. While the team are doing all they can to agree payment plans and ensure collection is as high as possible, we are seeing national chains fall and local businesses unable to survive. While the £407k projected reduction in income could be recovered in subsequent years this is by no means certain and we are likely to see the MTFs impacted by a drop in commercial rent in the short to medium term.

	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
Revenues & Housing Support								
HBP001-Rent Allowances	1,043,404	1,052,687	9,283	260,300	0	0	-17,300	243,000
HBP003-Local Housing Allowance	2,575	41	-2,534	10,300	0	0	-1,300	9,000
HBP005-Benefit Fraud Investigation	32,700	30,176	-2,524	131,900	0	0	-13,300	118,600
HOM001-Homelessness	76,575	114,747	38,172	331,200	-135,000	0	174,500	370,700
HOM002-Homelessness Grants	25,500	28,700	3,200	51,000	0	0	0	51,000
HOM003-Rent In Advance Scheme	0	3,342	3,342					
HOM004-Refugees	11,700	11,705	5					
HOM005-Homelessness Hostel Accommodation	0	-6,494	-6,494					
LTC001-Council Tax Collection	45,030	50,360	5,330	307,200	45,000	0	-101,300	250,900
LTC002-Council Tax Support Administration	42,025	37,950	-4,075	42,500	0	0	-24,000	18,500
LTC011-NNDR Collection	525,348	518,772	-6,576	-59,800	4,000	0	-9,600	-65,400
PSH001-Private Sector Housing Grants	16,725	11,444	-5,281	67,800	0	0	-22,700	45,100
PSH004-Home Improvement Service	6,300	11,623	5,323	-47,500	45,000	0	-73,400	-75,900
Total - Revenues & Housing Support	1,827,882	1,865,052	37,170	1,094,900	-41,000	0	-88,400	965,500

Quarter 1: During Q1 the Council has accommodated a higher volume of clients in Bed & Breakfast and hotel accommodation as a result of the Government's "Everyone In" policy, bringing rough sleepers into accommodation during the Covid 19 lockdown. This additional expenditure is only partially met by Housing Benefit.

Full year forecast: There's an expectation that the increased spend on temporary accommodation will continue but offset by an increase in housing benefit. Council Tax Collection has a budget of £92k to cover the costs of young people leaving care but actuals spent on this in the last two years have indicated very low spend so this has been revised downwards accordingly. The Home Improvement Service has a significant shortfall in fee income in Q1 which is expected to continue until the end of the year although there is a contractual annual income expected from Oxfordshire County Council which is reflected in the forecast. Any small non essential admin spend has been removed.

Environmental Services	Q1 position			Revised Budget Forecast				
	Profiled Budget	Actual Exp	Variance (under) / overspend	Original budget 20/21	Forecast adj to income	MHCLG income recovery	Forecast adj to exp'ture	Revised 2020/21 Forecast
	£	£	£	£	£	£	£	£
CCC001-Climate Change	30,000	24,994	-5,006	320,400	0	0	-5,900	314,500
COR301-Policy Initiatives - Shopmobility	5,225	3,705	-1,520	20,900	0	0	0	20,900
CPK001-Car Parks - Off Street	66,625	92,672	26,047	176,100	55,000	0	-1,200	229,900
CPK011-On Street Civil Parking Enforcement	5,025	43,045	38,020	22,400	50,000	0	0	72,400
ENI002-Grounds Maintenance	124,531	123,902	-629	448,325	20,000	0	0	468,325
ENI303-Landscape Maintenance	18,450	18,493	43	800	0	0	0	800
FLD001-Flood Defence and Land Drainage	34,425	24,540	-9,885	139,000	0	0	0	139,000
REG004-Dog Warden	9,475	9,367	-108	-36,000	0	0	0	-36,000
REG005-Public Health Sewerage	725	381	-344	3,000	0	0	0	3,000
REG018-Pest Control	22,912	24,415	1,503	36,800	8,000	0	0	44,800
REG019-Public Conveniences	88,493	87,356	-1,137	173,400	22,800	-16,245	-26,600	153,355
REG023-Environmental Strategy	24,650	11,596	-13,054	98,600	0	0	-600	98,000
RYC001-Recycling	623,998	584,103	-39,895	2,060,391	-21,000	0	121,800	2,161,191
RYC002-Green Waste	-708,825	-749,047	-40,222	335,000	-42,000	0	0	293,000
STC004-Environmental Cleansing	260,225	263,758	3,533	1,041,000	0	0	0	1,041,000
TRW001-Trade Waste	-164,675	-124,663	40,012	85,500	148,008	-105,456	0	128,052
TRW002-Clinical Waste	-275	0	275	-1,100	0	0	0	-1,100
WST001-Household Waste	517,425	498,639	-18,786	2,070,500	0	0	-14,100	2,056,400
WST004-Bulky Household Waste	1,175	4,484	3,309	4,800	0	0	0	4,800
WST301-Env. Services Depot, Downs Rd, Witney	-18,125	-13,468	4,657	35,300	0	0	0	35,300
Total - Environmental Services	941,459	928,271	-13,188	7,035,116	240,808	-121,701	73,400	7,227,623

Quarter 1: The majority of income for the chargeable green waste service is received in the first few months of the year and its popularity has increased in lockdown. Contract expenditure is charged later in the year but the savings made in Q1 are expected to be retained to year end. Trade Waste has an income budget of £742K for the year but already we have billed £40K less than expected, credited £90K and of the current invoices, £100K remain unpaid which is a further risk not shown in the numbers above. Virtually all car park fee income (circa £60K) has been lost.

Full year forecast: Recycling centre gate fees are no longer being covered by the recycling credits to the extent they were. Last year we were £140K over budget and we anticipate at least a similar overspend in this year due to the increase in recycling during lockdown. Trade waste has been billed but as per Q1, 1/3 of invoices (circa £100K) remain unpaid. With over £300K due for billing to the end of the year we could see further requests for credit notes and higher levels of non payment so this is a significant risk area. Marriots Walk car park contributes circa £100k per year - which in turn is a significant part of the funding for CCTV. These invoices remain unpaid and constitute an additional risk.

Earmarked Reserves	Spent/			
	at 31/3/20	Committed	Balance	
Retained Earmarked Reserves	-9,908,070	3,199,923	-6,708,147	
Environment service reserve	-99,005	128,505	29,500	Overspend on riverbank repair
RES075 High St. Communities clean-up [MHCLG]	-2,534		-2,534	Residual balance
RES072 ERS Animal Welfare / HMO proj (1819 one off)	-32,356	6,000	-26,356	£6K spent on consultancy fees
RES073 1819 ERS fund to improve private water supplier	-30,000		-30,000	Project no longer required
Strategic Commerical Property Review (1718 outturn)	-15,000		-15,000	Superseded by current property review in progress
Insurance Reserve	-77,990	50,000	-27,990	Excess requirement on Insurance provision
Business Rates Movements Reserve	-567,092	500,000	-67,092	Excess requirement on Business Rates timing provision
Service resilience reserve	-23,000		-23,000	Potential service variations not currently required
Economic development reserves	-270,000		-270,000	Potential partnership development not being pursued
Homelessness Investment (17/18 outturn)	-35,000		-35,000	Residual balance from old initiative
Released to General Fund			-467,472	

Annex B - Capital spend at Q1 with additional 19/20 slippage requests

Capital Programme - 2020/21 to 2029/30

Scheme	2020/21 Original budget	budget c/fwd from 2019/20	Additional c/fwd	2021 New Schemes	2020/21 Total budget	Q1 Actual spend
Developer Capital Contributions					0	369,686
Parish Council Loans Scheme		15,000			15,000	
IT Provision - Systems & Strategy	100,000				100,000	32,335
Deployment of High Speed Broadband		2,059,651			2,059,651	
Council Buildings Maintenance Programme	125,000				125,000	
IT Equipment - PCs, Copiers etc	40,000	21,000			61,000	
Improvement Grants/Disabled Facilities Grants	606,800				606,800	56,077
Flood Prevention Works		101,570			101,570	
Cottsway - Blenheim Court Growth Deal			1,705,000		1,705,000	1,532,500
Community Grants Fund	200,000	100,000			300,000	10,015
Carterton Leisure Centre Phase 2 (18/19 budget)		1,226,514	-1,111,892		114,622	-114,622
Abbeycare - Public Art					0	850
Electric vehicle recharging points	150,000	400,000			550,000	
Raleigh Crescent Play Area (s. 106)		75,000			75,000	
Loan to Cottsway Housing Association		7,994,169			7,994,169	
Replacement dog and litter bins	12,000	53,000			65,000	
Weighbridge at Bulking Station		25,000			25,000	5,690
Replacement Street Sweepers	200,000				200,000	
Ubico Fleet - Replace Vehicle Hire Costs	508,000	572,000			1,080,000	
In-cab technology		140,000			140,000	
Shop Mobility - Replacement stock		10,000			10,000	
CCTV upgrading	100,000				100,000	
House Purchase (Syrian Refugees)			250,000		250,000	
Chipping Norton Creative Project	25,000	7,000			32,000	
Chipping Norton Sport Hall Floor		50,000			50,000	
Madley Park Playing Field project		21,939			21,939	10,370
Carterton Swinbrook Public Art	20,000	10,000			30,000	
Southhill Solar loan		2,000,000			2,000,000	
Affordable Housing in Witney (Heylo)				60,000	60,000	
Talisman re-roofing project				100,000	100,000	
Unicorn CPO purchase provision	350,000				350,000	
Town Centre Shop building renovation project	75,000				75,000	
	2,511,800	14,881,843	843,108	160,000	18,396,751	1,902,901



COUNCIL PRIORITIES REPORT

April 2020 - June 2020

Our vision is to support West Oxfordshire to be fit for the future through:



1. Climate Action

Leading the way in protecting and enhancing the environment by taking action locally on climate change and biodiversity.



2. Healthy Towns and Villages

Facilitating healthy lifestyles and better wellbeing for everyone.



3. A Vibrant District Economy

Securing future economic success through supporting existing local businesses and attracting new businesses to deliver the economic ambitions of the Oxfordshire Local Industrial Strategy.



4. Strong Local Communities

Supporting and building prosperous and inclusive local communities.



5. Meeting the Housing Needs of our Changing Population

Securing the provision of market and affordable housing of a high quality for the wide range of householders making their home in West Oxfordshire.



6. Modern Council Services and Sustainable Finance

Delivering excellent modern services whilst ensuring the financial sustainability of the Council.

Covid-19 response and recovery



952

Residents given
emergency support via the
Help Hub

Given the Council's responsibility for delivering services to over 100,000 residents, Covid-19 has been an unprecedented challenge which required us to react quickly to changing circumstances in order to support local business and economy, the voluntary and community sector and local residents. We have maintained essential services whilst redeploying staff to new areas of work to help deal with the crisis.

There has been a dynamic and inspiring community sector response across West Oxfordshire to the challenges introduced through the pandemic. Local groups, towns and villages have mobilised to support their communities and the Council has developed a Community Hub team to work effectively with voluntary sector partners and volunteers.



£27.1M

Total amount in business grants paid out
by West Oxfordshire District Council



84,750

waste and recycling containers
emptied weekly



20,306

Telephone enquiries dealt with
by the Council during COVID-19
lockdown



£16.9M

Total amount in relief to businesses paid out
by West Oxfordshire District Council

Collaboration with our partners at a County-wide level was required in order to respond to the crisis. In particular, close coordination and good communication between the County, City and District Councils, with the NHS and OxLEP, to support vulnerable people and align programmes to support local businesses.

As the response phase draws to a close the Council's focus has shifted to planning for recovery from the impacts of the pandemic and in the longer term, the District's renewal. The recovery and renewal work is being approached with a view to forming a Covid Recovery and Response Plan closely aligned to the overarching priorities of the Council Plan as they provide a helpful framework for ensuring that the wide ranging impacts of the pandemic are mitigated against and adapted to.

A Covid Recovery and Renewal Plan will articulate the Council's commitment to working with others to recover from the impact of the pandemic – the Council needs to build on its strengths in working with local communities, and with Oxfordshire's partners, that have been demonstrated during the early difficult months of the pandemic. Work is progressing on producing this Plan with the establishment of a Covid Advisory Group comprising Councillors working with Officers to consider how we will address new challenges and opportunities as restrictions ease and how the Council will support communities and businesses to thrive in a post-Covid world. A draft Covid Recovery and Renewal Plan will be considered by Full Council in October 2020.

Climate Action: Leading the way in protecting and enhancing the environment by taking action locally on climate change and biodiversity

The Carbon Action Plan is on track to be considered by Full Council in October 2020, and will identify and implement the actions and projects required for WODC to become a Carbon Neutral Council by 2030. This is underpinned by the Council's carbon accounting methodology which has been successfully peer-reviewed by independent consultants. The same consultants produced a report to inform the scope of Council emissions as a baseline for the Carbon Action Plan and strategy to achieve the Council's target to be carbon neutral by 2030.

In addition, the commitment to produce an overarching Climate Change Strategy which will be used to chart improvements in measurable environmental and biodiversity enhancements has also been progressed and is expected to be considered by Full Council in January 2021. Activity has focussed on consultation with a 4 week Climate Action Survey and Young People's competition launched in May. The Climate Action Survey results will inform the Council's next steps towards shaping both the Climate Change Strategy and related Biodiversity Plan. Early analysis indicates that there is clear support from the community for priorities aligning with themes on: energy & carbon reduction; biodiversity; green & active travel; water conservation; waste & recycling; development planning; communications and community engagement.

Regarding activity during Quarter 1 towards achieving biodiversity enhancements, the Council has now confirmed its commitment as a funding partner in the Oxfordshire woodlands mapping project which has the aim of doubling tree cover across Oxfordshire. This mapping work will contribute to our local knowledge base and spatial data on woodlands and will be of value not only to tree-growing objectives within a development planning context but also action being taken by the Council to increase woodland under the umbrella of its own Biodiversity Plan.

Participation in partnership activity towards biodiversity enhancements is of real value to the achievement of this Council Plan priority and it is positive to note that WODC is contributing to the Nature Recovery Network for the Oxfordshire which will eventually produce a Nature Recovery Strategy (a statutory requirement of the Environment Bill) that will endeavour to protect and enhance the natural environment as well as guiding the development of planning policies.

Moving to the built environment, the need for a review of current design and sustainability standards within new developments of West Oxfordshire was identified early on as a priority by the Council. Actions include assessing the viability of net-zero carbon as a standard for the Oxfordshire Cotswolds Garden Village; researching viability of Underground Refuse Systems at the Oxfordshire Cotswolds Garden Village, and addressing net-zero carbon within the draft Affordable Housing SPD (details under Housing priority). In addition to this, a Sustainability Checklist for Development Management which will inform standards and key performance indicators is in production. This will drive the achievement of lower carbon developments across the District.

Healthy Towns and Villages: Facilitating healthy lifestyles and better wellbeing for everyone

The value in adopting a 'healthy place shaping' approach in new and existing developments is highlighted in the Council Plan. In a positive step towards meeting this ambition, WODC is working in partnership with Oxfordshire authorities to develop a Health Impact Assessment (HIA) toolkit and methodology which will be applied to the delivery of the local plan and major developments. HIA is a practical approach used to judge the effects a proposed development may have on the health and wellbeing of different groups of people. The findings of HIAs are used to make recommendations to decision makers as to how any negative health impacts of a development can be reduced, and any positive health impacts maximised.

A HIA methodology has been drafted by consultants in support of the Oxfordshire Plan 2050 with the toolkit being published later in 2020. It is intended that this methodology will be used by developers and consultants when preparing major development proposals to help shape and inform design choices. Healthy Place Shaping has been further augmented by Policy 4 in the Salt Cross Garden Village Area Action Plan which requires a 'Rapid Health Impact Assessment' to accompany any planning application for major development at the garden village. This must demonstrate alignment with the emerging Oxfordshire HIA methodology, to fully identify the needs of everyone in how they live and work, access and use all types of infrastructure, services and networks.

Consultants were commissioned to undertake a Built Indoor Leisure Facilities Strategy for the District in March 2020, a significant step towards achieving this key action identified in the Council Plan. The initial stages of the process have involved an audit of current indoor leisure facilities stock across the District. Concurrently, Sport England has modelled leisure facility need against projected population growth for the District. In addition to this early preparatory work towards the Built Indoor Leisure Facility Strategy, a Focus Group to consider the need in the Witney area and scope for a relocated Windrush Leisure Centre ('Windrush 2') is anticipated. To further progress 'Windrush 2' a site identification study has commenced by Ellis Williams Architects Ltd.

The outputs of the initial audit, modelling against population growth and focus group outcomes will inform a needs analysis of indoor Leisure facilities – addressing current, latent and unmet need for built leisure facilities across West Oxfordshire. This will form the basis of the Built Indoor Leisure Strategy and associated Action Plan on which Cabinet is expected to take a decision in Autumn/ Winter 2020.

Note – The progression of Windrush 2 will be dependent upon the yet to be formed recommendations in the Built Indoor Leisure Strategy.

A Vibrant District Economy: Securing future economic success through supporting existing local businesses and attracting new businesses to deliver the economic ambitions of the Local Industrial Strategy

The Council Plan identified two strategic areas for economic growth which the Council is also committed to delivering through their inclusion in the Local Industrial Strategy: the Carterton Technology Hub and the Garden Village Science Park.

The Carterton Technology Hub Update: This project seeks to unleash the economic role, potential and value of Carterton through a new Technology Hub. Local market strengths include many small businesses with specialisms in high-tech manufacturing and engineering in addition to RAF Brize Norton. There is a local imbalance of jobs to workers leading to around 60% out-commuting (including to nearby Witney), indicating both the need and opportunity to diversify the local economy. A strategic outline case has been developed which has informed a proposition paper to the OxLEP, thus further evolving the business case for the project which was successfully made through its inclusion in the adopted Local Plan. Next steps include a detailed feasibility study and SWOT analysis informed by input from a wide range of stakeholders previously engaged in the concept through the Local Plan process. Carterton Town Council is identified as a potential lead partner – supported by WODC and involving the MOD, RAF, OxLEP, local businesses and residents.

The Salt Cross Science and Technology Park Update: Allocated as part of the new 'Garden Village' strategic development area in the adopted Local Plan, the newly named Salt Cross Garden Village includes a 40hectare science and technology park that will attract the best businesses giving them the space to grow and create high value jobs in line with the ambitions of the Oxfordshire Local Industrial Strategy. The Area Action Plan has been approved by Full Council and includes a policy detailing the requirements of the park which will deliver, within an extensive network of green and blue infrastructure, 80,000m² of science, technology, engineering and high tech related business floor space. Concurrently an Outline Planning Application has been received by site promotor, Grosvenor Estates, which proposes 57,000m² of B-Class land uses as part of an employment area with the proposed uses to be determined at the Reserved Matters Application stage of the planning process. Once the Area Action Plan has been adopted this will be used to set the policy context against which the planning application for Salt Cross will be determined, of which the Science and Technology Park is part.

In close proximity to the Salt Cross Science and Technology Park is Hanborough Station and indeed this is identified within the Council Plan as a focus for partnership effort to secure new and upgraded infrastructure, including short and long-term enhancements to the Cotswold railway line. In Quarter 1 the Hanborough Station Sub-Group of the North Cotswold Line Task Force has been established, bringing together the five county councils and Local Enterprise Partnerships covering the 86-mile route between Hereford, Worcester and Oxford, together with the Cotswold Line Promotion Group, Network Rail and the Great Western Railway. In January 2020, the Task Force submitted its case to the government for a doubled two trains per hour North Cotswold Line service between Worcestershire, Oxford and London and this is now being assessed by the Department for Transport and Network Rail. In parallel, the Task Force set out its aspirations for additional local trains as a metro-style service between Hanborough and Oxford to support West Oxfordshire housing

growth, the visitor economy and to encourage a shift from road to rail for journeys to Oxford or London. The Sub-Group will develop the case for these local services, plans for expanded passenger facilities at Hanborough Station, and engage with local stakeholders and communities.

On the theme of lower carbon transportation, the value of provision of Electric Vehicle Charging Points (EVCP) as a means of improving the public realm in our town centres was identified as an action towards achieving a vibrant district economy, in addition to zero carbon ambitions. Two approaches to this are underway:

- **WODC direct procurement of Electric Vehicle Charging Point (EVCP) in Council-owned car parks:** BP Chargemaster is working on behalf of the Council to develop a full costing for the installation of EVCP in, initially, two Council-owned car parks. An application with the District Network Operator (DNO) to request costings associated with energy utility and infrastructure requirements for a power supply to the EVCP is currently with the DNO and is requiring resolution.
- **EVCP in partnership with Innovate-UK funded, Oxfordshire Park and Charge Project:** WODC Cabinet has endorsed a partnership approach to the second phase of EVCP provision in Council-owned car parks across the District and County beyond. A Financial Agreement has been signed signifying this commitment and the necessary surveys and viability assessments to progress EVCP delivery are underway.

Additionally an Oxfordshire Electric Vehicle Strategy is being developed to set a consistent design and technical standard for EV infrastructure across the County. This strategy is being co-ordinated by the iHub Innovation Team at OCC, with partnership involvement of WODC and other Oxfordshire authorities.

Strong Local Communities: Supporting and building prosperous and inclusive local communities

The response to the pandemic has shone a spotlight on the importance of this priority – we have witnessed a dynamic and inspiring community sector response across West Oxfordshire to the challenges introduced by the pandemic. Local Groups, towns and villages have mobilised to support their communities and the Council established a Community Response Hub to further augment these efforts and work effectively with voluntary sector partners and volunteers. There has also been a strong collaborative effort to tackle the crisis, where the Council has sought, together with the County, City and District Councils, the NHS and OxLEP to support vulnerable people and align programmes to support local businesses.

These collaborative efforts between ourselves and partners, and the communities we serve must continue and be built upon in order to respond to any local Covid-19 outbreaks, address any local food security issues, and meet any duties to support those who are vulnerable. This work will be ongoing as necessary at the same time as continuing to make progress on other aspects of the Council Plan identified under this priority, as described further below.

A commitment in the Council Plan to direct our management of property assets through a new Asset Management Plan to achieve improvements in the joint use of sites through the One Public Estate programme has moved a step forward with completion of a series of feasibility reviews of sites in Welch Way. Following this we are considering scope for feasibility work on partnership owned sites to consider options for development that suit all partner's needs – in accordance with the principles of the One Public Estate Programme. The next action will be to undertake a draft scoping exercise to which input will be invited from all partner organisations.

A further commitment to working with partners to promote West Oxfordshire as a visitor attraction (whilst protecting its essential character) is made in the Council Plan and the pandemic has placed a new emphasis on the visitor economy as tourism patterns have changed with a drop in international visitors to the District (and the wider Cotswolds) against a backdrop of greater domestic tourism demand. A bid for £125k to the Discover England Fund (£40m government fund originally designed to only target overseas visitors which has now largely repurposed for the domestic market) has been submitted to enable increasing exposure of new/little known experiences to a wider market. A decision will be known in September. Furthermore, a survey has been launched of local tourism businesses which is giving an overview of some of the challenges faced by the visitor economy in the wake of the pandemic. This information will assist in targeting the Council's approach to supporting the visitor economy to recover and renew post-Covid. Some particular patterns of note from the survey are:

- A number not intending to open before August and some not before next year, particularly those reliant on overseas visitors eg tour companies, or B&B's who are averse to having visitors into their homes

- More than half have signed up to VisitBritain's covid compliance accreditation scheme 'We're Good to Go'
- A third only taking advance online bookings (highlighting the need for digitalisation of tourism businesses)
- All respondents anticipate they will be operating at half capacity

Given the significant contribution the visitor economy makes to West Oxfordshire it is evident that the need for support for this sector will be particularly acute and requires focus as we prepare for recovery and renewal post-Covid.

Meeting the Housing Needs of our Changing Population: Securing the provision of market and affordable housing of a high quality for a wide range of householders making their home in West Oxfordshire

A significant step towards achieving this priority has been accomplished with the publication of the draft Affordable Housing Supplementary Planning Document (AH SPD) which is being consulted on over summer 2020. Once adopted the detailed guidance it provides will steer the successful implementation of Local Plan Policy H3 on the delivery of affordable housing. Following review of consultation responses received, a revised draft SPD will be published in Autumn 2020 for a further, final period of public consultation before being formally adopted. At this stage the AH SPD will become a material planning consideration.

Local Plan Policy H3 requires the provision of on-site affordable housing as part of larger market housing schemes of 11 or more units varying by location from 35% - 50%. In addition, smaller market housing schemes of 6-10 units within the Cotswolds AONB are required to make a financial contribution towards the provision of affordable housing within the District. The policy also addresses the issue of housing mix and the provision of affordable housing in rural areas including through rural exception sites. By providing additional guidance on the implementation of these requirements, the AH SPD seeks to set out a range of options and requirements to secure delivery of successful affordable housing schemes across the District that meet the housing needs of our changing population.

Options for delivery are presented including criteria for identifying qualifying sites; the size of affordable homes needed, the preferred tenure mix, rural exception sites and self and custom build schemes. Delivery is addressed through requirements relating to design criteria, accessibility and adaptability, space standards, zero carbon homes and modern methods of construction. Specific delivery mechanisms are articulated including housing options for the Armed Forces and also Key Workers and Community Led Housing.

Finally, exploration of two new routes to affordable housing in the District are presented:

- *The Blenheim Approach:* WODC is working closely with Blenheim Estate on an innovative model for delivering an increased level of affordable housing at between 60 – 80% of market rental costs. This model has been successfully implemented in Long Hanborough and will also be offered on their other sites for development at Woodstock East. It is the intention of Blenheim to retain ownership of the rental properties so they can be held in perpetuity for local people, especially those within the key worker categories.

- *Partnerships with Legacy Landowners:* WODC is also interested in partnering with other legacy landowners to accelerate delivery of affordable housing in the District and the AH SPD invites those landowners (particularly in smaller rural settlements) who are considering development as part of their long term legacy planning to engage with them to explore the scope for delivering affordable housing through rural exception sites.

Further to the achievement of the AH SPD, progress towards the delivery of Shared Ownership of Affordable Housing in Witney has been made. In partnership with the Oxfordshire Growth Deal and Heylo Housing, WODC has been able to pursue the acquisition of four apartments of affordable housing rather than them being sold on the open market as originally intended. As a partner on the Oxfordshire Growth Deal, the Council has benefited from their partnership with Heylo Housing (a Registered Provider) who are able to negotiate bulk purchase of new homes from developers for use as shared ownership housing. Over the longer term the ambition is for 100 new affordable homes across all Growth Deal partner authorities to be acquired in this way, of which it is anticipated 20% of these will be within West Oxfordshire.

Modern Council Services and Sustainable Finance: Delivering excellent modern services whilst ensuring the financial sustainability of the Council

It has been the case for some time that local government finances have been constrained in part by local government finance grant cuts and increasing service costs pressures. These have been further amplified by the pandemic (greater draw on Council services, extraordinary service costs and lost revenue streams) and this, coupled with future limitations to incentive based funding such as the New Homes Bonus, present the Council with a challenge to match delivery ambitions to our revenue stream.

An Investment Strategy has therefore been drafted (and due for consideration by Full Council in October 2020) which sets out a range of tools and activities to help improve the general approach to matching income and expenditure across the activities of the District Council. The strategy starts from a premise that there is a significant funding gap that needs to be closed and capital investment is a major tool available to the Council to achieve this so long as it covers the revenue implications of that investment and makes an appropriate return. Capital Investment provides a route to delivering the ambitious programme of the Council set out in the Council Plan.

The Council is also undertaking a range of service improvement projects which will focus on people, processes and technology. During Q1, members approved the contract award to Civiva for a new Revenues and Benefit system for use across the partnership which will deliver effective, efficient and modern Revenues and Benefits Services. A full project plan is in place to upgrade Forest's system, and then to migrate Cotswold (December 2020) and West (January 2021) to Civiva in time for annual billing and benefit uprating. In May 2020 all three systems will be merged which will allow officers across the partnership to access all cases. There are two major benefits:

- customers will be able to self-serve for example, notify the Council of changes online; this will reduce the need to send out paper documents which is costly, and in turn will reduce our carbon footprint.
- the streamlining of processes and the ability to perform one annual billing process and one benefit uprating process across the partnership, saving huge amounts of time and effort.

Our Salesforce platform is used by Customer Services across the partnership and every day it manages over 1500 customer interactions.

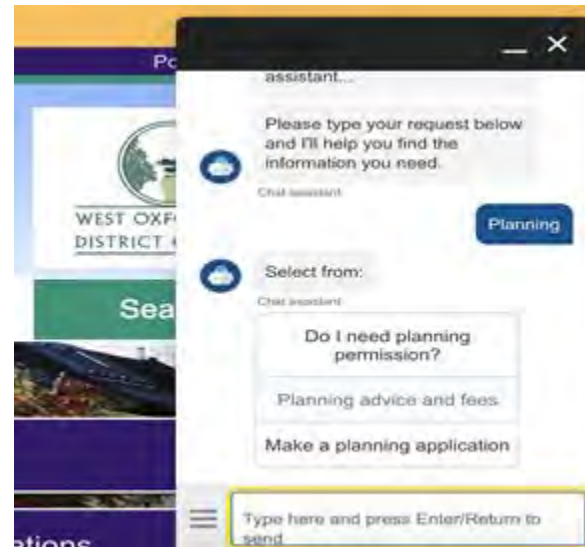
The Live Chat capability which was launched on the Council's website in January allowing customers to interact in real time with Customer Services, also proved useful in supporting the CS team to handle the demand created by Covid-19 as well as the change to the waste contract.

In July, the Salesforce Einstein BOT was introduced to the Live Chat process which allows the customer to connect to an AI BOT which will attempt to automatically answer the questions. This service is available 24/7, although during working hours, our customers will still have the option of conversing with a real person.

In May, Salesforce was used to support the Discretionary Business Grants process. An online form /flow was built in less than two weeks and was able to perform eligibility check so that we only received valid grant applications.

Once the application was received, for the first time, Salesforce was used by both Customer Services and the Back Office to process the application.

Salesforce was also used to create the necessary payment files for processing through the General Ledger and our BACS payment systems.





Delivering great services locally

PERFORMANCE REPORT:
April 2020 - June 2020

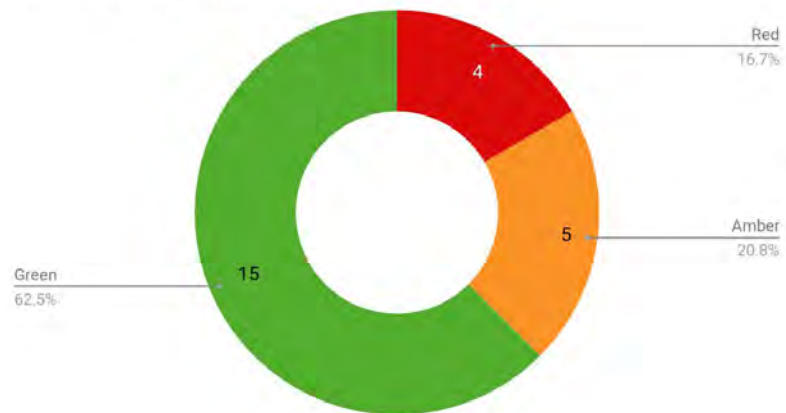
KEY PERFORMANCE METRICS LIST

Finance and Management O & S Committee	Economic and Social O & S Committee	Environment O & S Committee
Customer satisfaction – face to face	Number of households living in emergency accommodation for under 28 days	Number of fly tips collected
Customer satisfaction – web	Number of households living in emergency accommodation for over 28 days	Percentage of fly tips that result in an enforcement action taking place (defined as a warning letter, fixed penalty notice, simple caution or prosecution)
Customer satisfaction – telephone	Number of Long Term Empty properties	Percentage of high risk notifications (including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries) risk assessed within one working day
Percentage of calls responded to within 20 seconds	Percentage of major planning applications determined	Percentage of high risk food premises inspected within target timescales
Percentage of telephone calls abandoned by the customer before being answered	Percentage of minor planning applications determined	Residual household waste per household (kg)
(Cumulative) Percentage of council tax collected	Percentage of other planning applications determined	(Cumulative) Percentage of household waste recycled
(Cumulative) Percentage of business rates collected	Percentage of appeals allowed	Number of missed bin per 100,000 scheduled collections
(Cumulative) Average number of days taken to process new housing benefit claims	(Cumulative) Number of affordable homes delivered	Total hours spent undertaking on and off-street parking enforcement visits
(Cumulative) Average number of days taken to process housing benefit change of circumstances	Percentage of land charge searches dispatched within 10 working days	
(Cumulative) Percentage of housing benefit overpayment due to LA error/Admin delay	Number of visits to leisure centres	

KEY PERFORMANCE METRICS

At a glance...

Summary of Performance



Indicator	Status
Customer satisfaction - phones	Green
Customer satisfaction - F2F	n/a
Customer satisfaction - website	Red
% calls responded within 20 secs	Green
% abandoned calls	Amber
CT collection rate	Green
NNDR collection rate	Green
Average days to process HB new claims	Green
Average days to process HB change events	Green
% HB overpayment	Red
Households in Emergency Accomodation under 28 days	Red
Households in Emergency Accommodation over 28 days	Red
% major applications determined within time	Green
% minor applications determined within time	Green
% others applications determined within time	Amber
% appeals allowed	Green
Affordable homes delivered	Green
% land charge searches dispatched within time	Green
% high risk notifications assessed within time	Green
% high risk food premises inspected within time	Amber
Residual waste per household (kg)	Green
% overall recycling rate	Green
Missed bins per 100,000	Green
Leisure visits	Amber
Parking enforcement hours	Amber

OVERALL PERFORMANCE

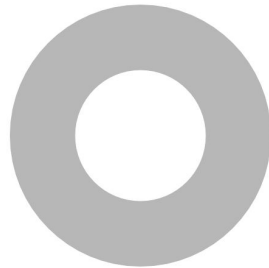
Overall those services that have been able to continue service delivery have performed well, despite the impact of Covid-19 on resources as well as workloads. Some services have had to cease operation and / or implement new ways of working in order to deliver their services. A number of the indicators which are 'red' and 'amber' have been affected wholly or partly by Covid-19.

There does not appear to be a significant detriment to limiting the delivery of services to online, virtual or phone; and customer satisfaction for services delivered by phone remains high.

CUSTOMER SERVICE

Customer satisfaction

Face to face - no surveys due to Covid19

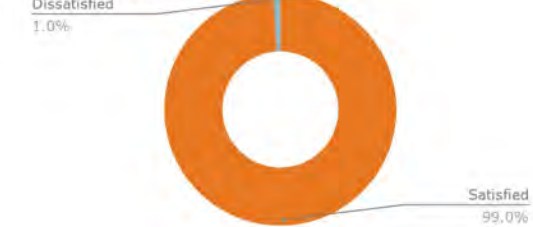


Website

49 Respondents

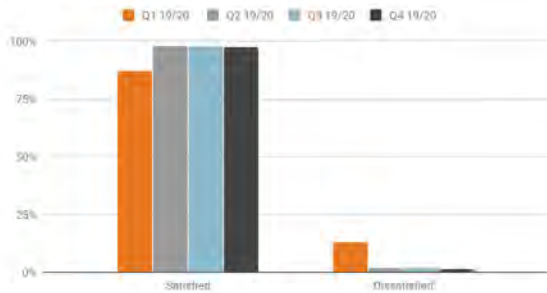


Phone
734 Respondents

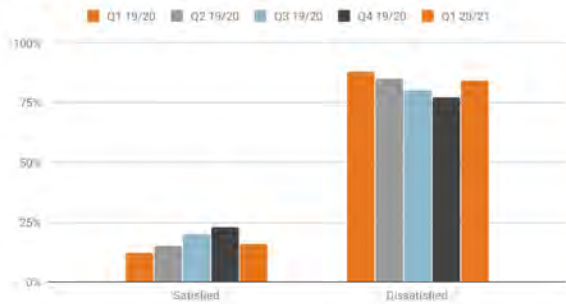


What's the trend?

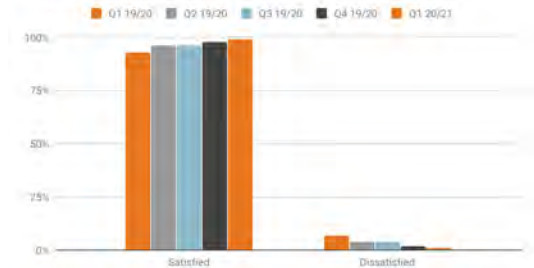
Face to Face



Web



Phone

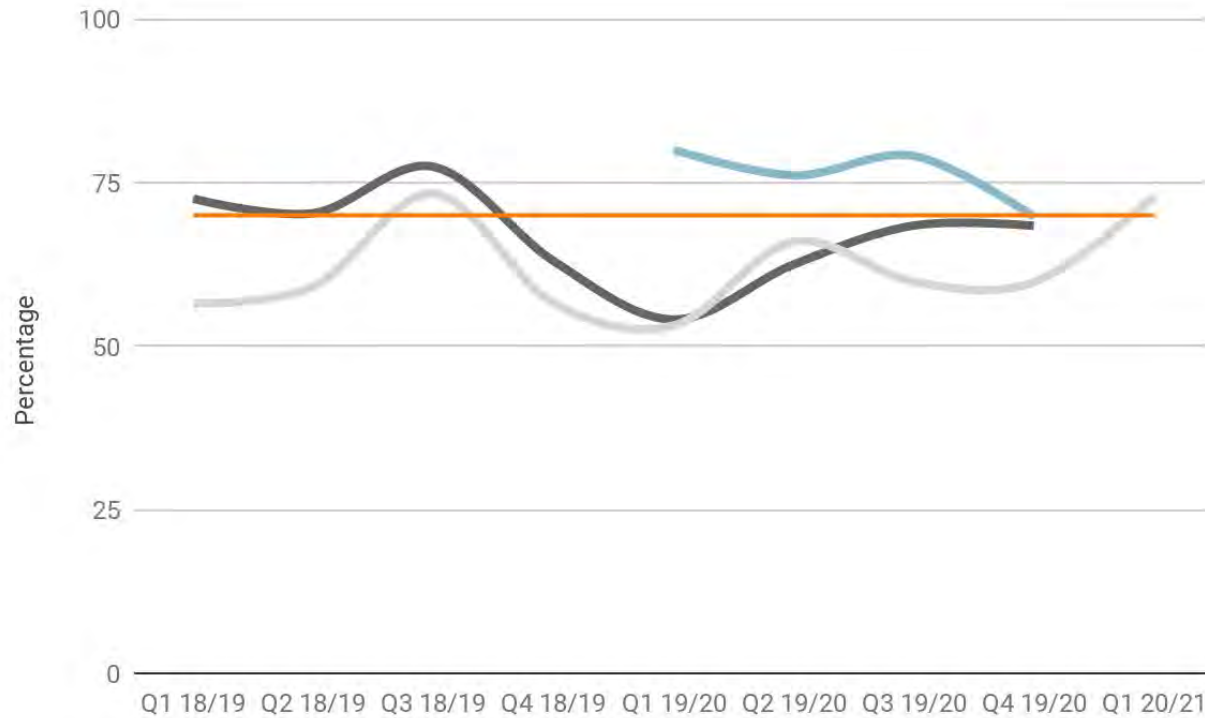


OBSERVATION

Satisfaction with services delivered face to face and telephone remains high. Due to covid-19, the Council closed its reception areas and therefore no face to face surveys were completed.

Website data suggested that improvements were needed to ensure Council websites are user friendly and allow people to transact with us, as well as acting as a source of information. A new website went live on 12 March, and is still undergoing improvements to the content. It is too early to expect to see significant improvements in the satisfaction rating, and the small number of respondents (49) is likely to skew the results

Percentage of calls responded to within 20 seconds



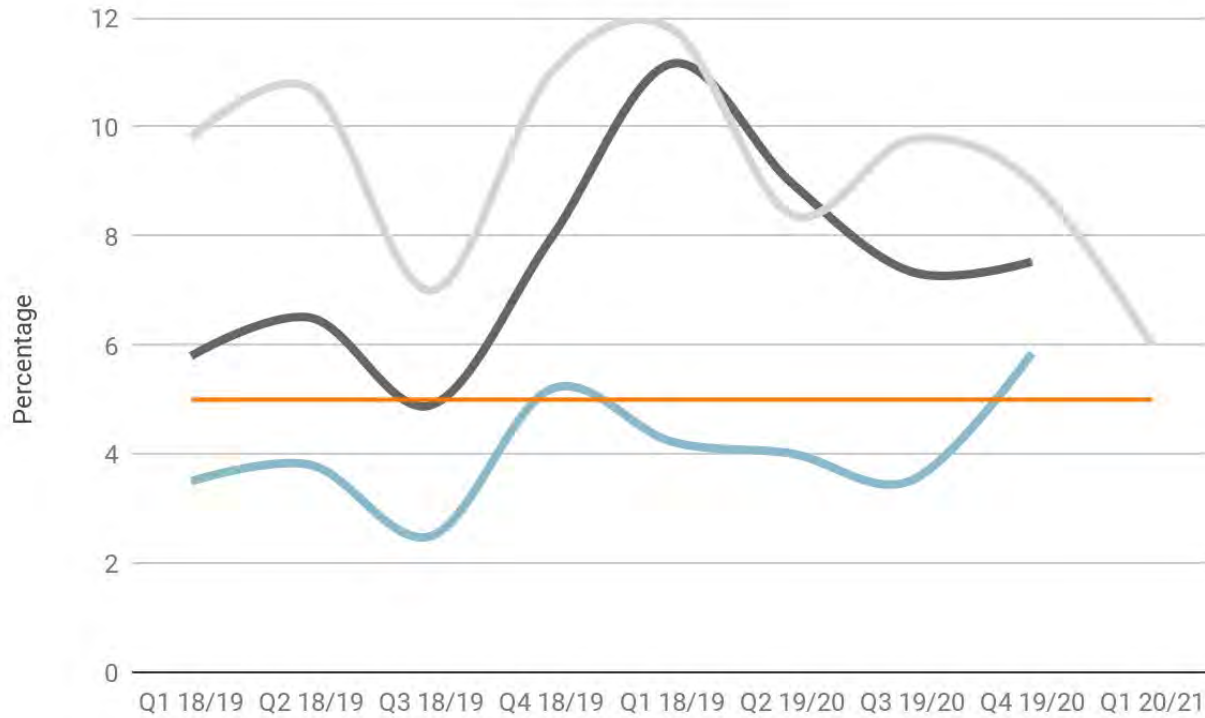
OBSERVATION

For a large part of 2019/20 performance was affected by the implementation of the new CRM system and further enhancements that took time to 'bed in', as well as turnover of staff.

There were higher workloads in 2019-20 Q4 including a spike in calls relating to garden waste renewals, and to Covid-19. The transfer of five staff who usually provide face to face services to the phones has helped to improve performance levels.

The Council has started to offer some face to face appointments for those customers who cannot access services by other methods

Percentage of telephone calls abandoned by the customer before being answered

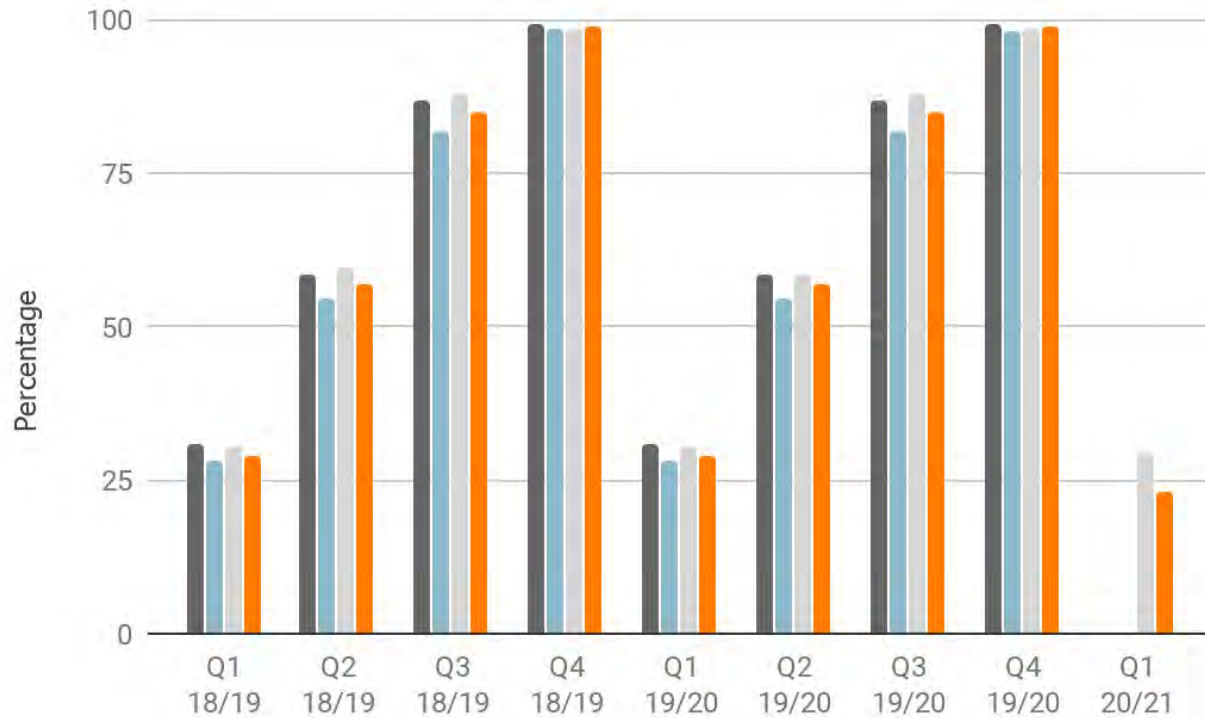


OBSERVATION:
Historically, the service has experienced capacity issues caused by turnover and the implementation of a new CRM system. The transfer of staff from the face to face sites to the phones has contributed to the improved performance

Revenues and Benefit

Percentage of council tax collected (cumulative)

Target
 Cotswold
 Forest of Dean
 West Oxfordshire



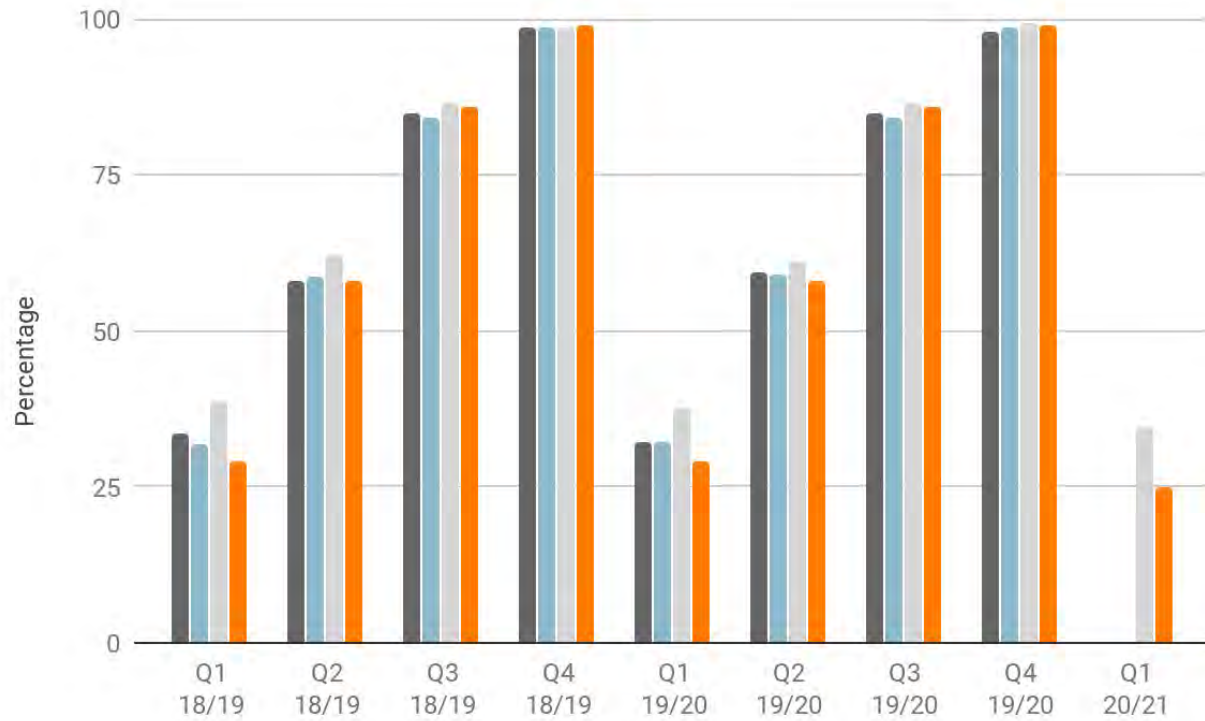
OBSERVATION:

At the end of Q1, there was a slight decrease in the collection rate compared to previous years.

Due to the impact of Covid-19, all recovery action was paused following government guidance and Member decision. The service is working with customers to re-align payment instalments to potentially run between June 2020 and March 2021.

The service sent out 'soft' reminders at the end of the quarter

Percentage of business rates collected (cumulative)



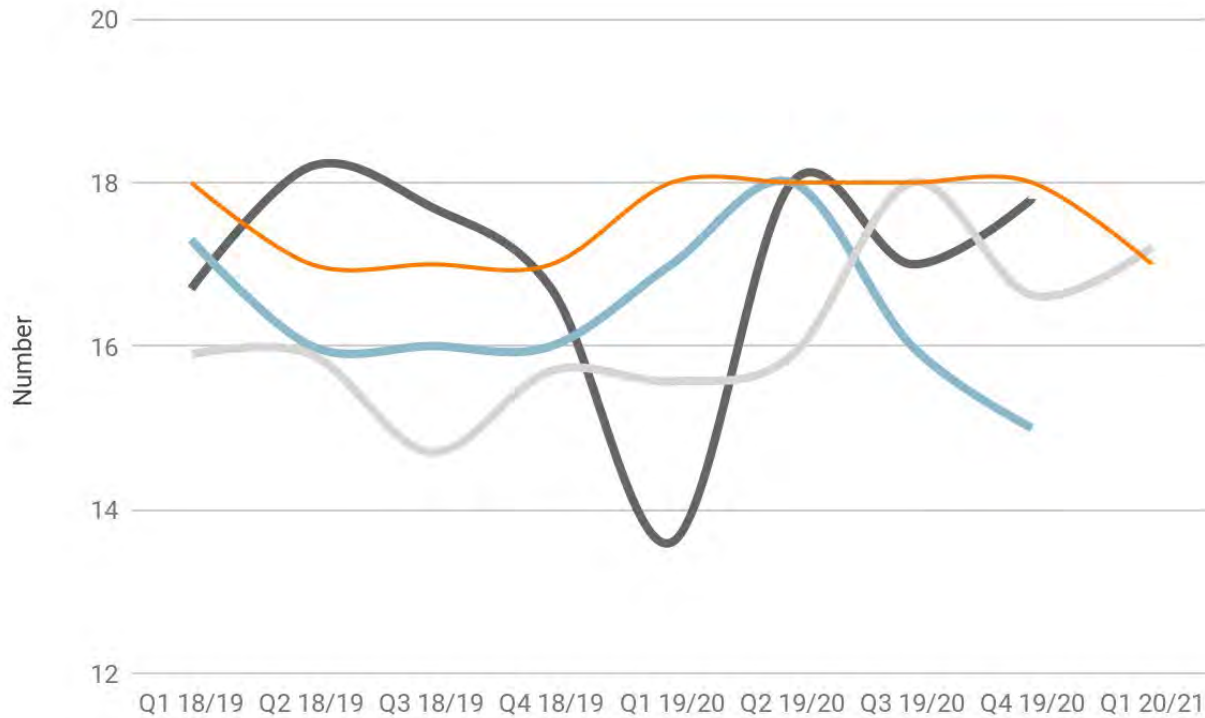
OBSERVATION:

The collection rate at the end of Q1 was lower than previous years.

Due to the impact of Covid-19 and the lock down, many businesses were closed in Q1 and all recovery action was paused. The service is advising and supporting businesses, and businesses are able to delay payment instalments to June.

A high proportion of businesses have had expanded retail relief (shops and businesses that customers are able to visit) which means that their business rates for the year have been waived. The Council will be reimbursed for these waived payments through grants from the government.

Average number of days taken to process new housing benefit claims (cumulative)



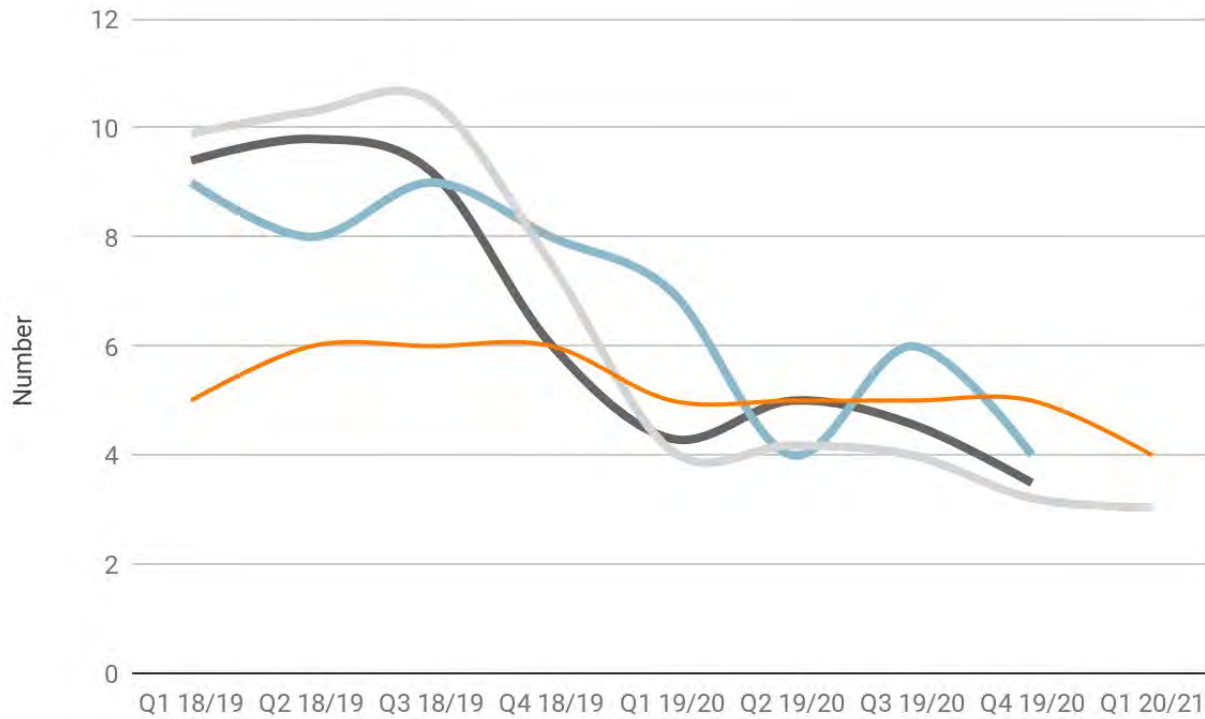
OBSERVATION:

There was an increase in temporary accommodation claims due to Covid-19 which has resulted in a slight increase in average processing times. These types of claims are difficult to administer as claimants may be placed outside of the District or have difficulty returning forms to the Council especially during lock down.

The service was able to access external support 'on demand' which helped to manage workloads.

Note that historically the quarterly targets have been profiled and have generally been maintained at 17 or 18 days. In comparison the shire average is around 20 days

Average number of days taken to process housing benefit change of circumstances (cumulative)



OBSERVATION:

Overall, the indicator is currently showing sustained improvements

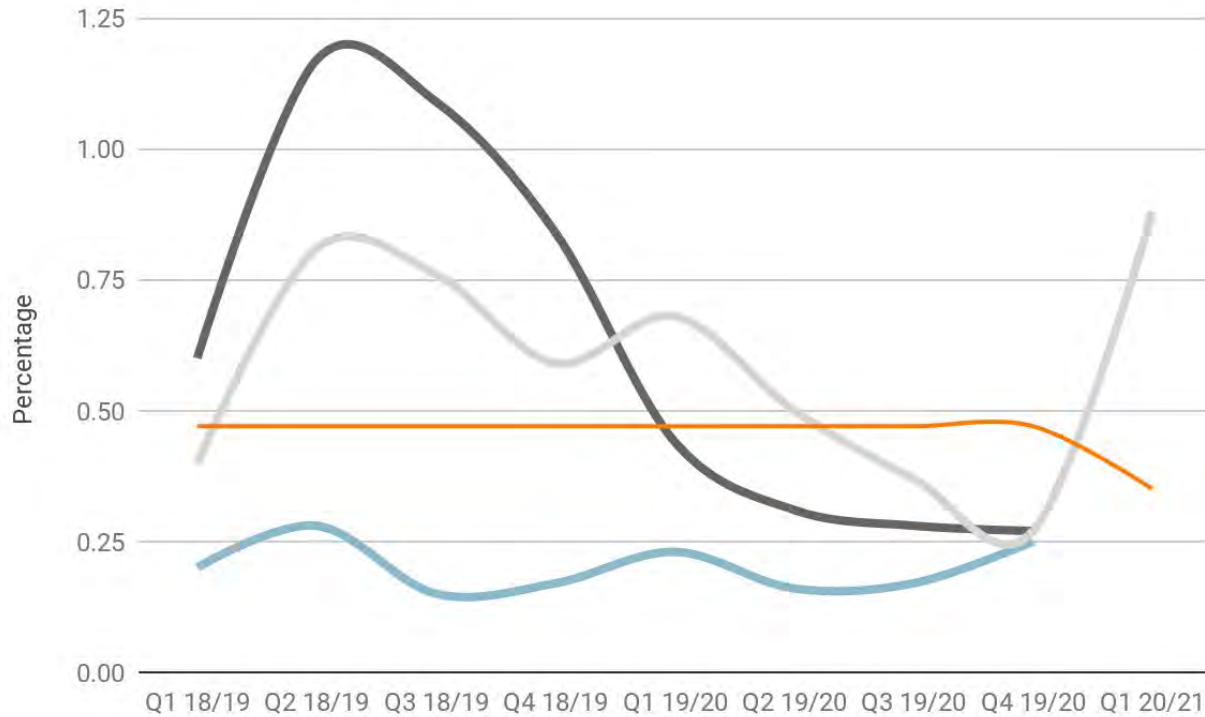
The number of Universal Credit claims has increased due to the impact of Covid-19, which in turn has resulted in an increase in changes that affect housing benefit.

The service was able to access support from an external service 'on demand' which has helped to to manage workloads.

Note that historically the quarterly targets have been profiled and have generally been maintained at 5 or 6 days. A more stringent target of 4 days has been set for 2020-21

Percentage of housing benefit overpayment due to LA error/Admin delay (cumulative)

Target
 Cotswold
 Forest of Dean
 West Oxfordshire



OBSERVATION:

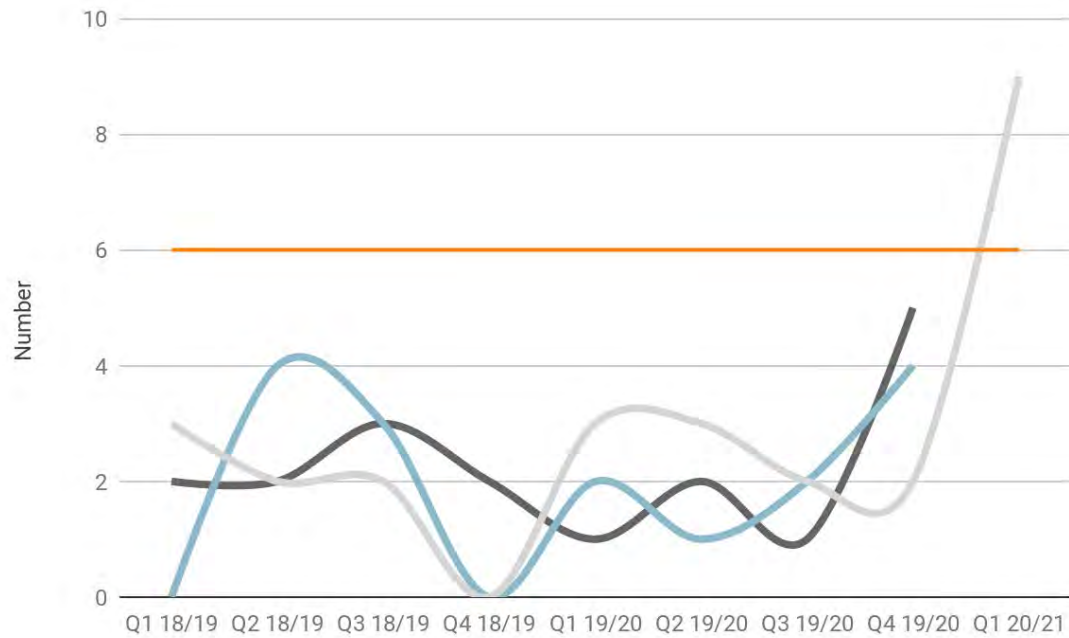
We are continuing to involve a number of staff in quality assurance. Due to the high volume of change of circumstances, we take a sampling approach and target areas which we know have high error rates such as calculation of earnings.

The majority of the overpayment in Q1 related to LA error (0.84%). There were a small number of errors relating to high value overpayments in Q4 which were amended in Q1

Housing Support

Number of households living in emergency accommodation for under 28 days

Target Cotswold Forest of Dean West Oxfordshire

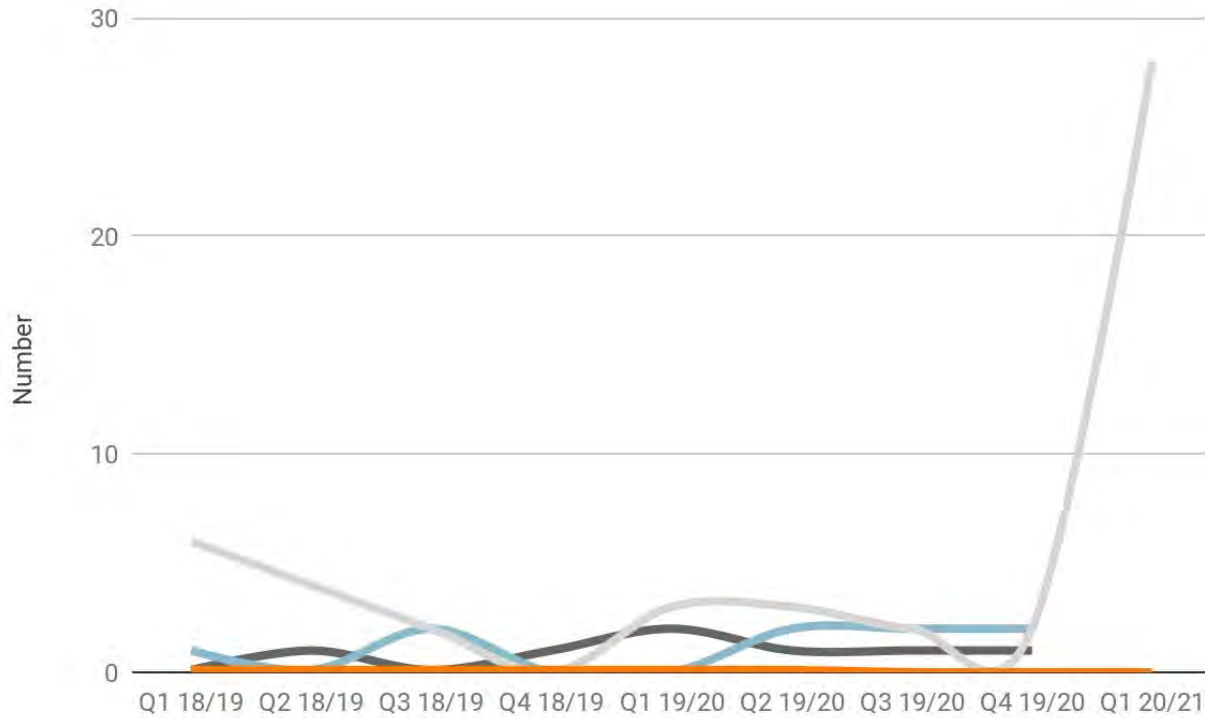


OBSERVATION:

Due to Covid-19, the number of households living in emergency accommodation is rising. All clients who are rough sleeping or at risk of imminent homelessness regardless of priority need who have approached the Council have been placed in emergency accommodation.

The Housing team is both placing clients and procuring accommodation, working with Property services and Estates. The Council is using a mixture of holiday let accommodation, and pubs with B & B accommodation and is also able to utilise accommodation available across the partnership

Number of households living in emergency accommodation for over 28 days

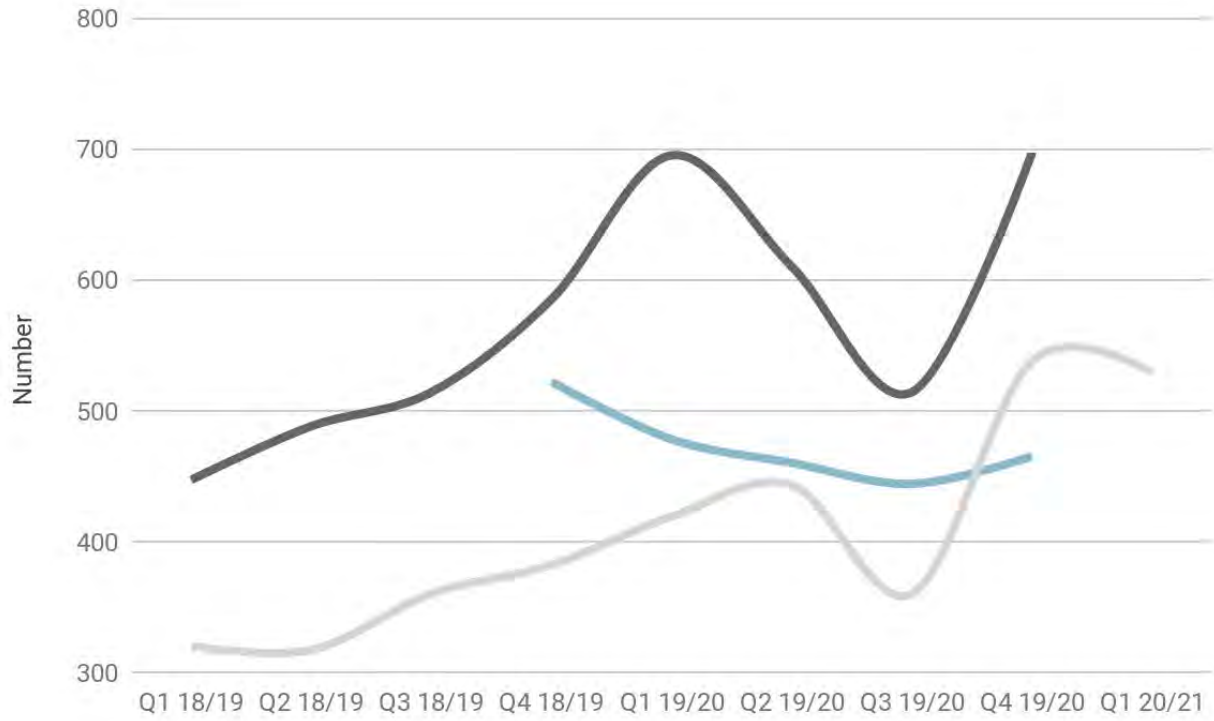


OBSERVATION:

Due to Covid-19, the number of households living in emergency accommodation is rising. All clients who are rough sleeping or at risk of imminent homelessness regardless of priority need who have approached the Council have been placed in emergency accommodation. The Housing team is both placing clients and procuring accommodation, working with Property services and Estates

Number of Long Term Empty properties

Cotswold Forest of Dean West Oxfordshire



OBSERVATION:

The number of long term empty properties has increased over the last six months due to government instruction to pause house moves in order to contain Covid-19. Furthermore, 44 housing association properties are awaiting demolition.

The LTE officer monitors and works with landlords to support them to bring their properties back into use, however, there is a reluctance to rent to households on the housing register

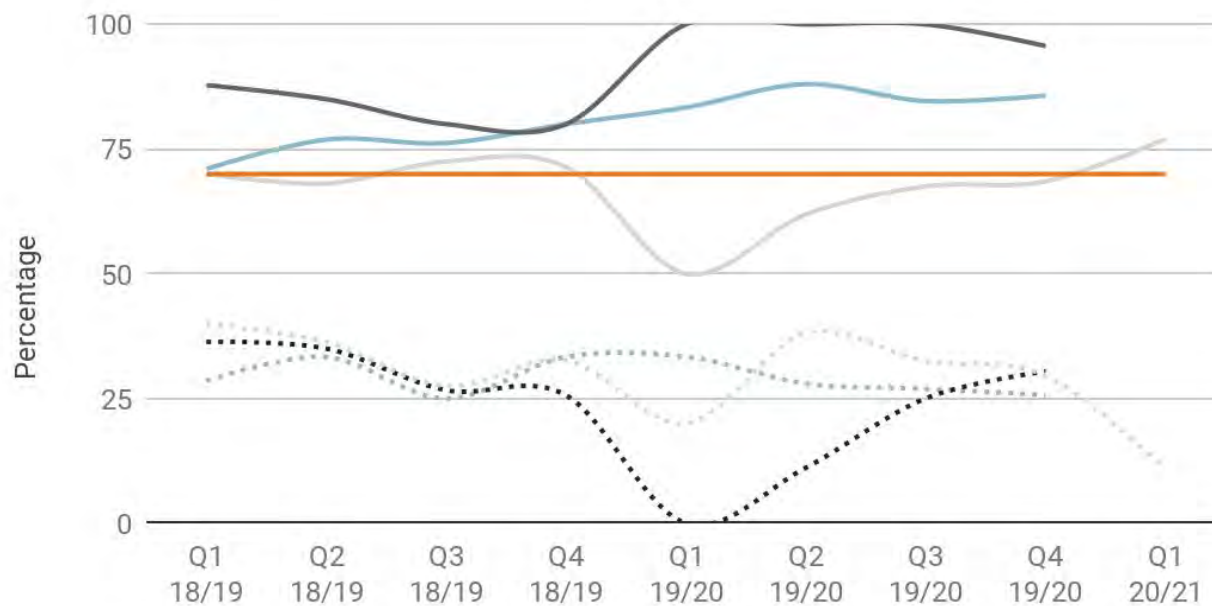
Planning and Strategic Housing

Percentage of major planning applications determined

% of all applications completed within an agreed timeframe



% of all application completed within 13 weeks



OBSERVATION:

Nine major applications determined in the quarter, a lower number in comparison to Q1 of the previous year (13).

Performance was affected as the team moved into lock down; there was no ability to hold Planning Committees and the schemes of delegation did not enable them to be determined. The subsequent move to virtual committees has resolved this issue albeit that the restrictions on site visits, no physical meetings with agents and staff remote working adds considerable delay/complexity to the process and is affecting on-going performance now that the volume of applications received has returned to normal levels. A greater proportion of applications are taking longer than the 13 weeks and would be out of time if an extension of time had not been agreed.

The chart for the planning performance measures has been separated to demonstrate the number of applications that are completed within the set time frames and the number that are completed as a result of an agreed extension of time.

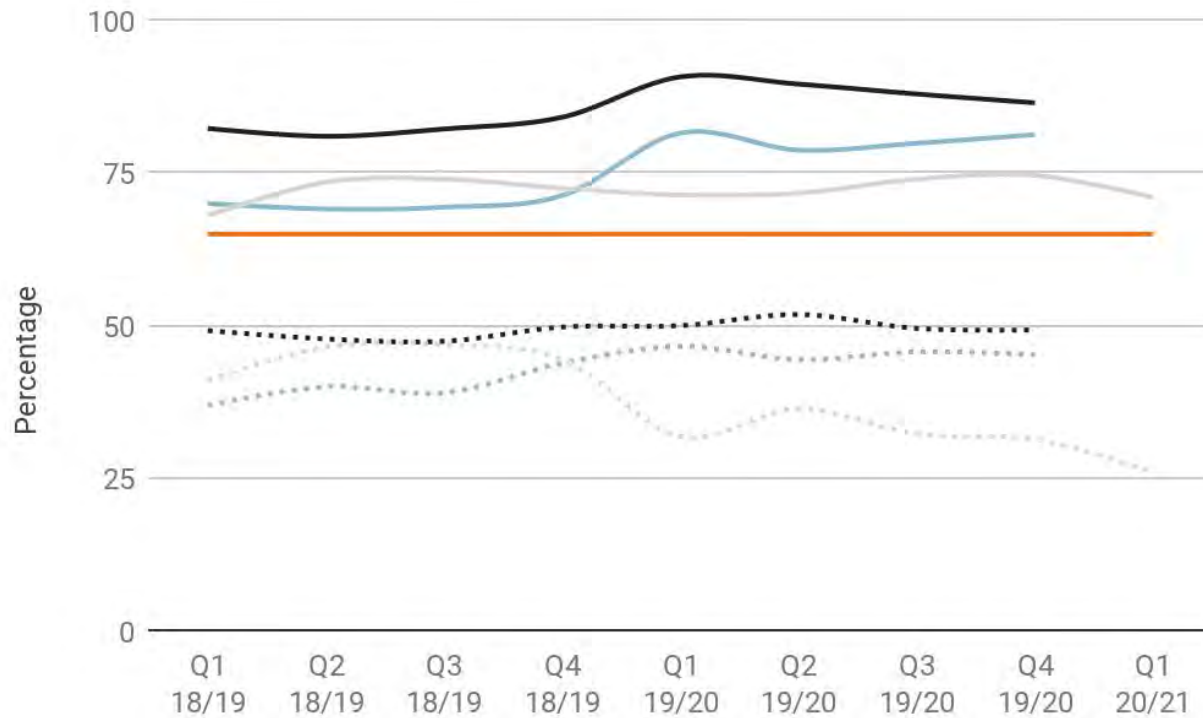
Extensions of times are often a result of consultees requesting changes to the scheme or because the consultee response is essential but has not been received within the timetable. They are also used where officers are working proactively with applicants to improve schemes and make developments acceptable.

Percentage of minor planning applications determined

% of all applications completed within agreed timescales



% of all applications completed within 8 weeks



OBSERVATION:

76 minor applications determined in the quarter, a lower number in comparison to Q1 of the previous year (128).

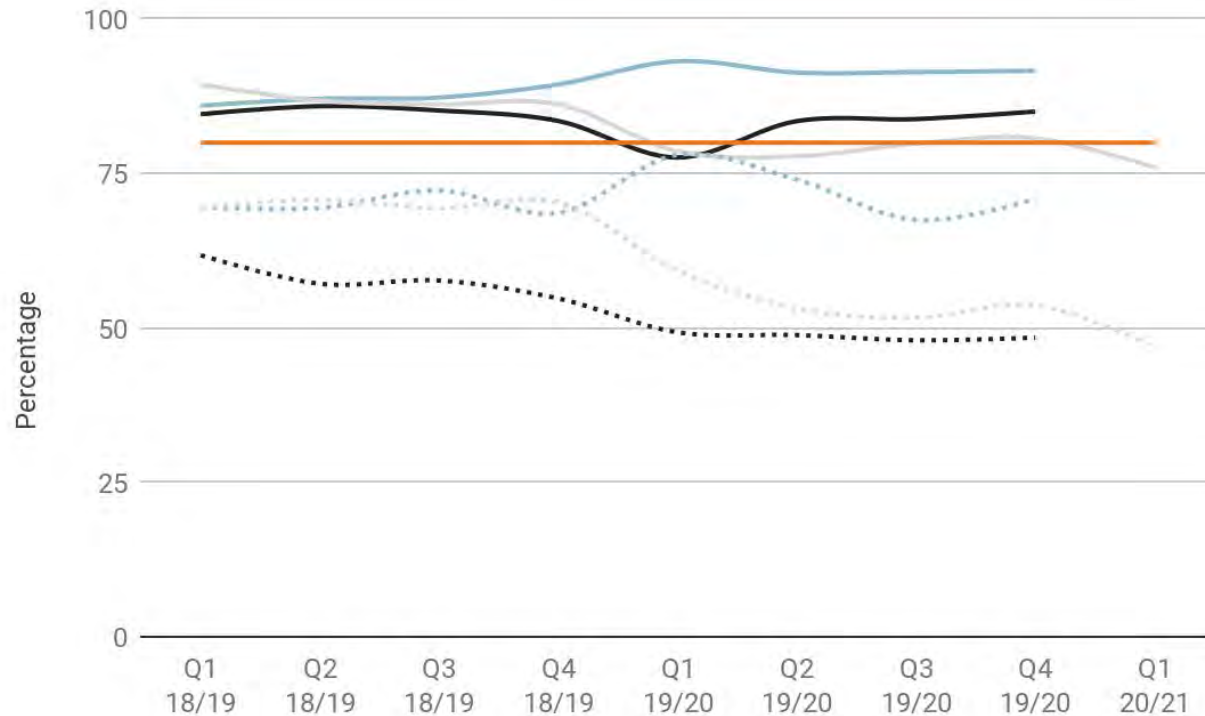
Performance was affected as the team moved into lock down; restrictions on site visits, no physical meetings with agents and staff remote working adds considerable delay/complexity to the process and is affecting on-going performance now that the volume of applications received has returned to normal levels. A greater proportion of applications are taking longer than the eight weeks and would be out of time if an extension of time had not been agreed

Percentage of other planning applications determined

% of all applications completed within agreed timescales



% of all applications completed within 8 weeks



OBSERVATION:

228 other applications determined in the quarter, a lower number in comparison to Q1 of the previous year (300).

Performance was affected as the team moved into lock down; restrictions on site visits, no physical meetings with agents and staff remote working adds considerable delay/complexity to the process and is affecting on-going performance now that the volume of applications received has returned to normal levels. A greater proportion of applications are taking longer than the eight weeks and would be out of time if an extension of time had not been agreed

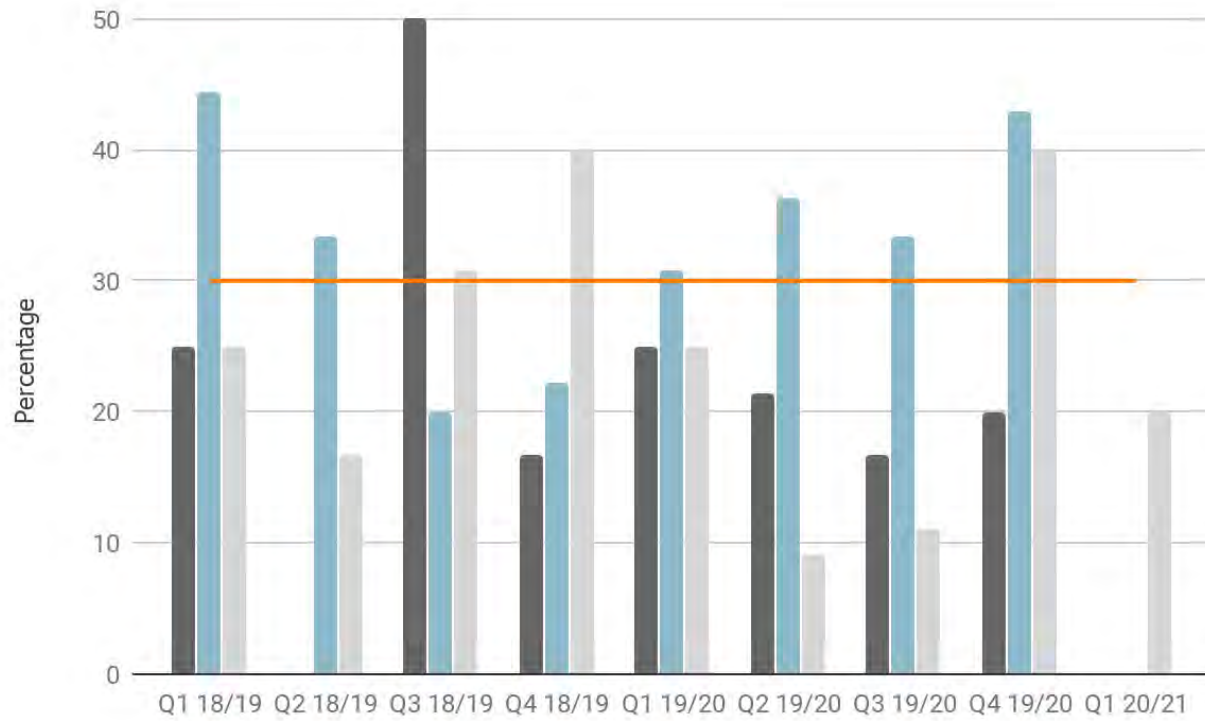
Percentage of appeals allowed

Target

Cotswold

Forest of Dean

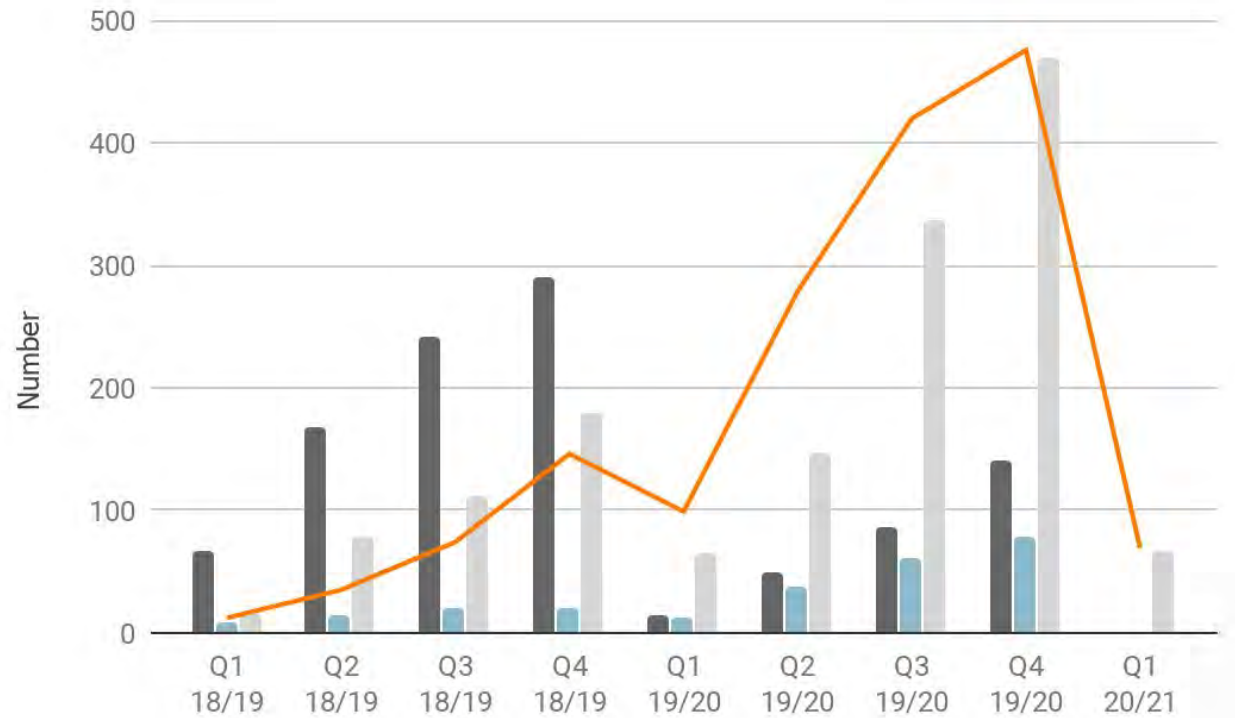
West Oxfordshire



OBSERVATION:

One of the five appeals was allowed

Number of affordable homes delivered (cumulative)



OBSERVATION:

Sixty-seven affordable homes were delivered in Q1 including 15 at Thornbury Rd, Eynsham, 18 at Barwood, Nethercote Road, 12 at West Witney (Persimmon) and 12 at Bloor, E. Carterton.

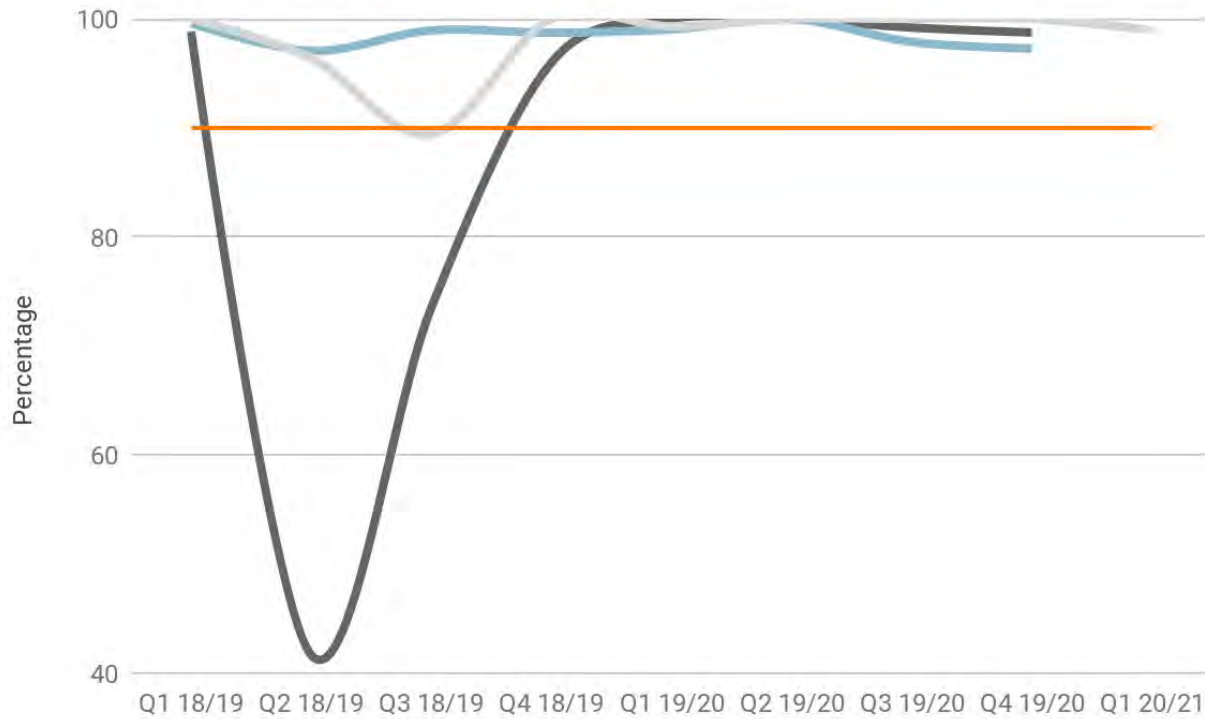
Due to the impact of Covid-19, sites were closed or working with a reduced number of staff from late March to early May.

Registered providers have received updated programmes from developers, who are also advising that programmes could be subject to change as the year progresses and further disruption relating to the virus emerge. At this stage, the forecast still shows a healthy number of completions this year.

There are challenges around managing hygiene and social distancing, as well as reconfiguring and increasing welfare facilities, and considering how trades are managed.

Percentage of land charge searches dispatched within 10 working days

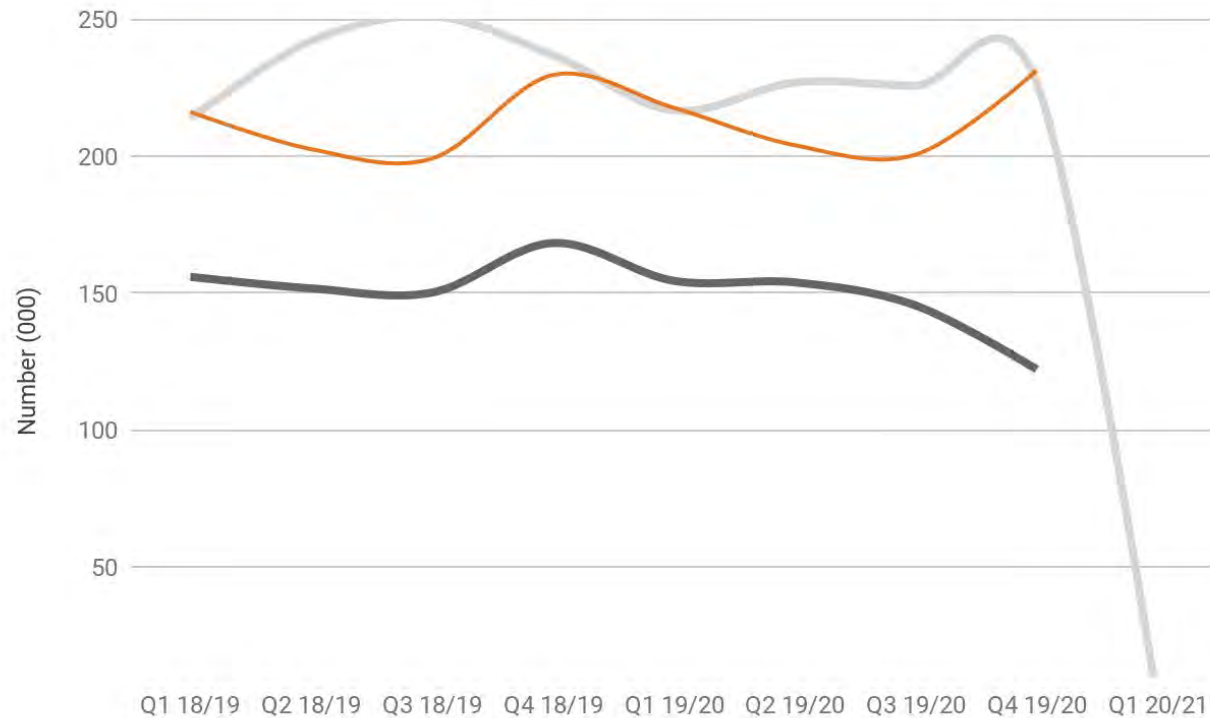
Target Cotswold Forest of Dean West Oxfordshire



OBSERVATION:
The service processed 288 official land charge searches, of which 285 searches were dispatched within 10 working days.
Overall, the service has maintained a high level of service delivery.

Leisure

Number of visits to leisure centres



OBSERVATION:

This indicator has been set to 'amber' in recognition that the service was unable to operate during Q1.

Memberships were frozen from 20 March as the nation went into lock down; and there is an option for members to continue to freeze their memberships.

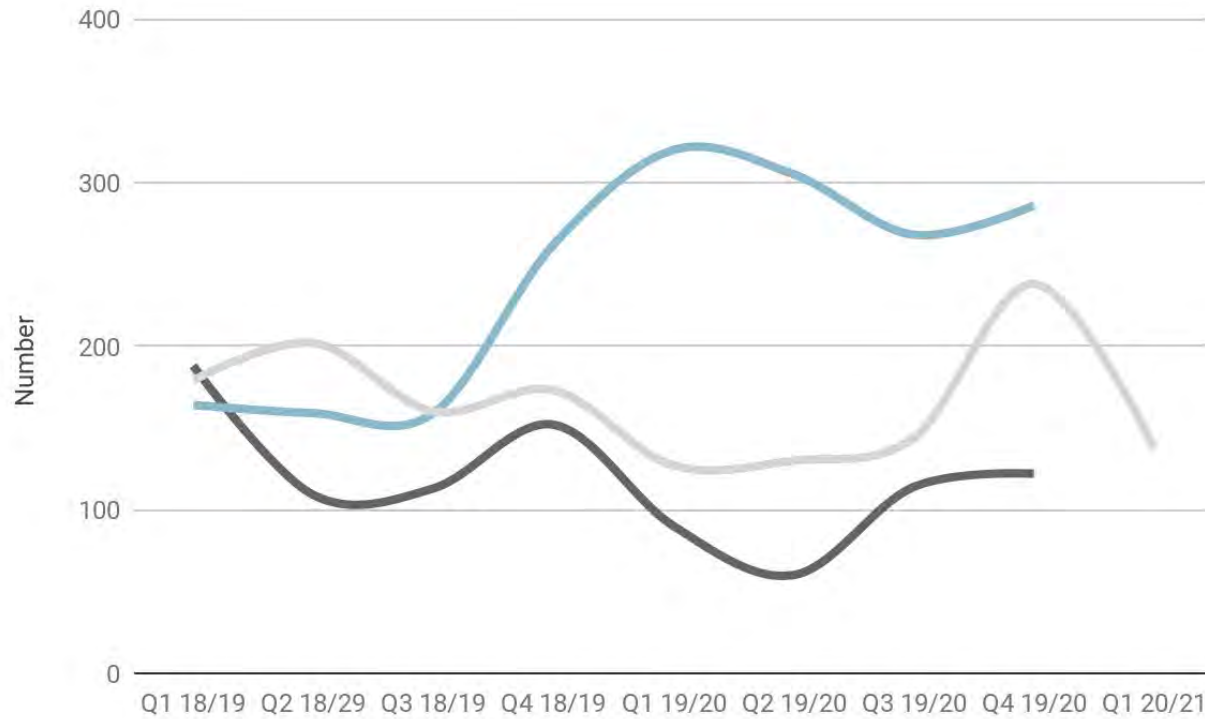
West Oxfordshire District Council is working with GLL Better to agree a financial recovery package to help restart the leisure service.

Following the implementation of Covid-19 protocols including putting hand sanitisers in place, one way systems, social distancing measures, and mandatory pre-booking of sessions, some of the Council's leisure facilities were reopened by GLL Better on 25 July. Further facilities and services will be opened as the recovery stage progresses

Environmental and Regulatory

Number of fly tips collected

Cotswold Forest of Dean West Oxfordshire



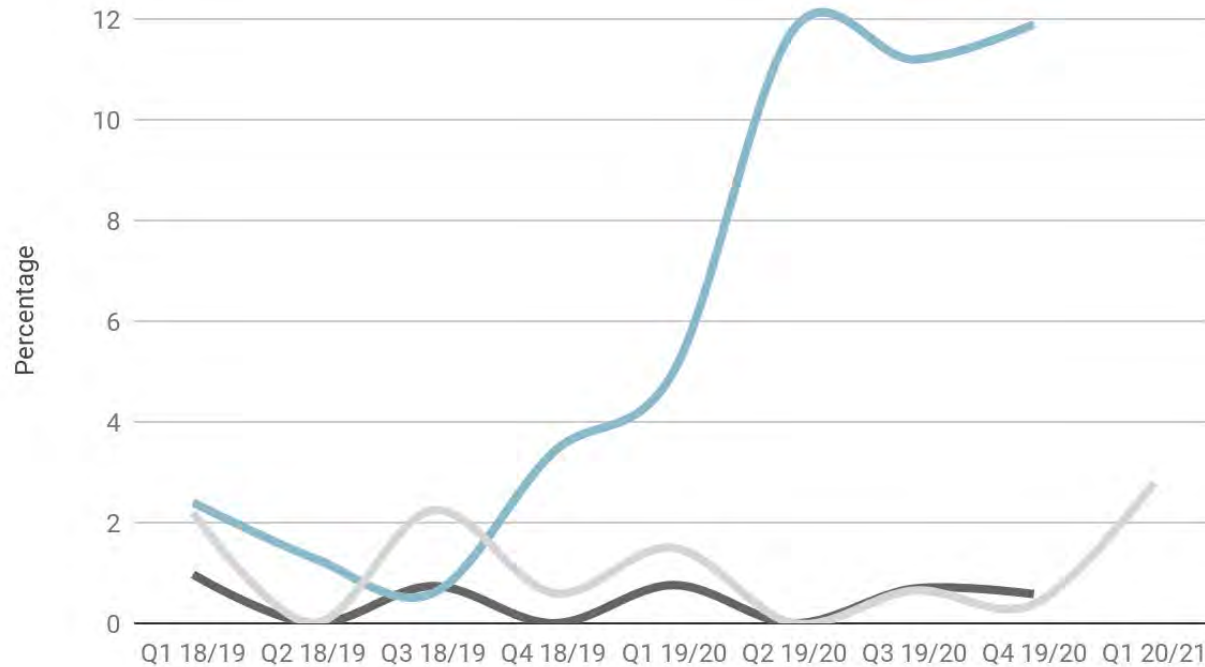
OBSERVATION:

Due to Covid-19, increases in fly tips have been reported nationally, however this is not yet evident in West's figures

A high percentage of the fly tips at the Forest of Dean are at recycling sites, which are not counted by West and Cotswold

Percentage of fly tips that result in an enforcement action taking place (defined as a warning letter, fixed penalty notice, simple caution or prosecution)

Cotswold
 Forest of Dean
 West Oxfordshire



OBSERVATION:

There were 179 notifications of fly tips in Q1 which resulted in 8 enforcement actions lodged against 5 flytips..

At West and Cotswold, fly tipping is investigated by ERS who take a risk based triage approach to investigation. Officers use their professional judgement to decide whether it is likely that the fly tip will contain evidence that could lead to enforcement action; this is based on an assessment of the waste type reported, for example, black rubbish bags are likely to contain evidence that could lead to enforcement action being taken while a fly tip of car tyres would be highly unlikely to contain the necessary evidence.

In contrast, at Forest of Dean, the Street Warden team usually investigate all fly tips.

The ERS team visited 16 fly tips, a lower number than usual due to the Covid-19 restrictions. The Council will always take enforcement action if fly tipping is witnessed.

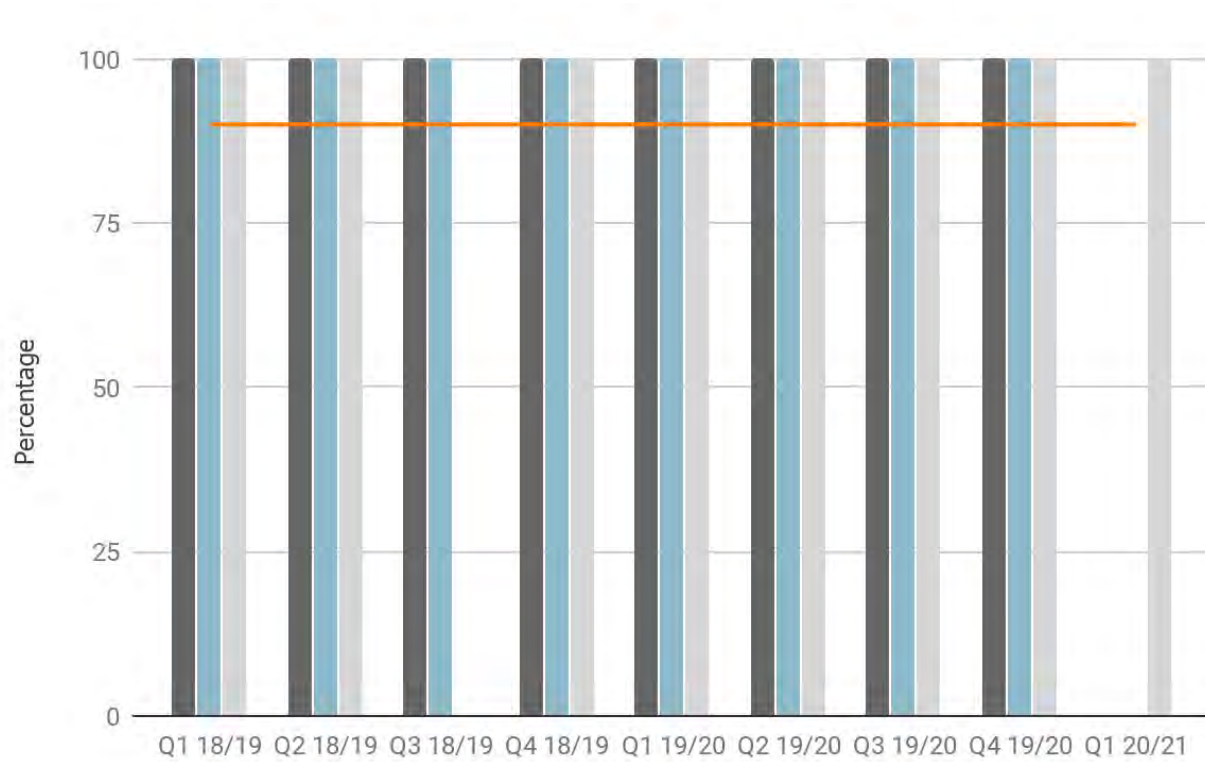
Percentage of high risk notifications (including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries) risk assessed within 1 working day

Target

Cotswold

Forest of Dean

West Oxfordshire

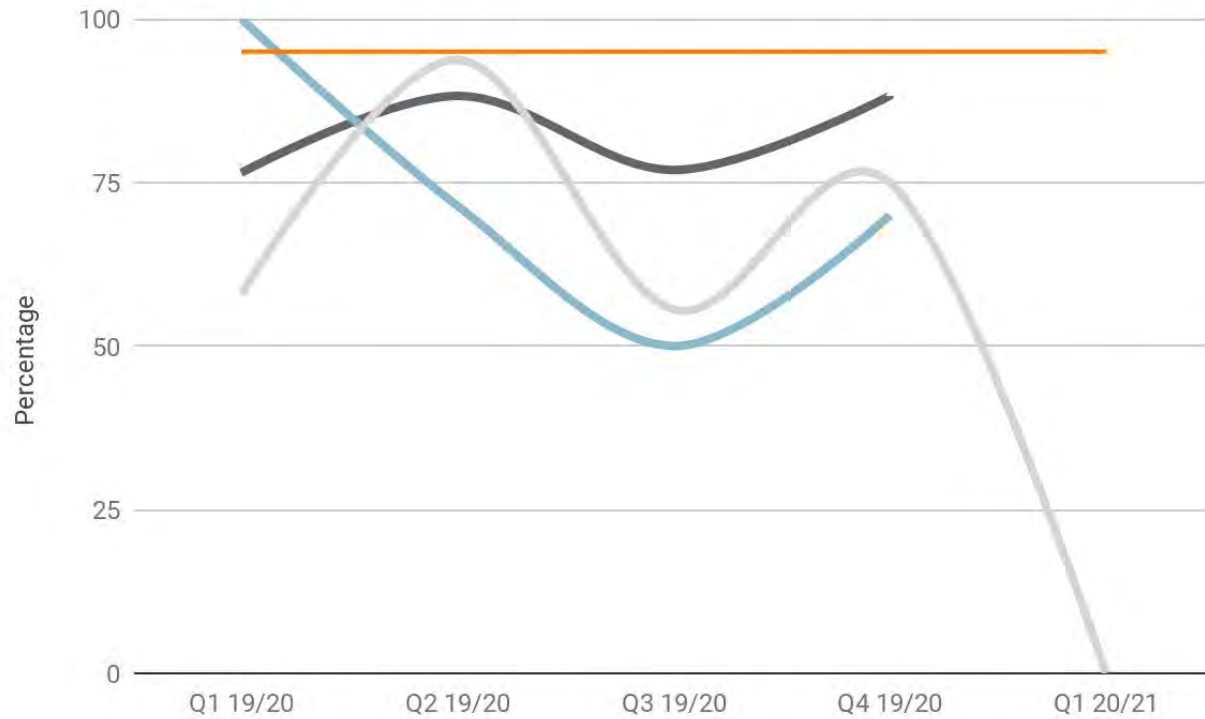


OBSERVATION:

Two notifications were received in Q1 and assessed within one day - one report of asbestos on a fly tip and one allegation of neighbour harassment

Percentage of high risk food premises inspected within target timescales

Target Cotswold Forest of Dean West Oxfordshire



OBSERVATION:
This indicator has been set to 'amber' to recognise that the service had to cease site visits in mid-March following Covid-19 advice. Further guidance was received from the Food Standards Agency to cease all Food Hygiene Interventions until 18 July

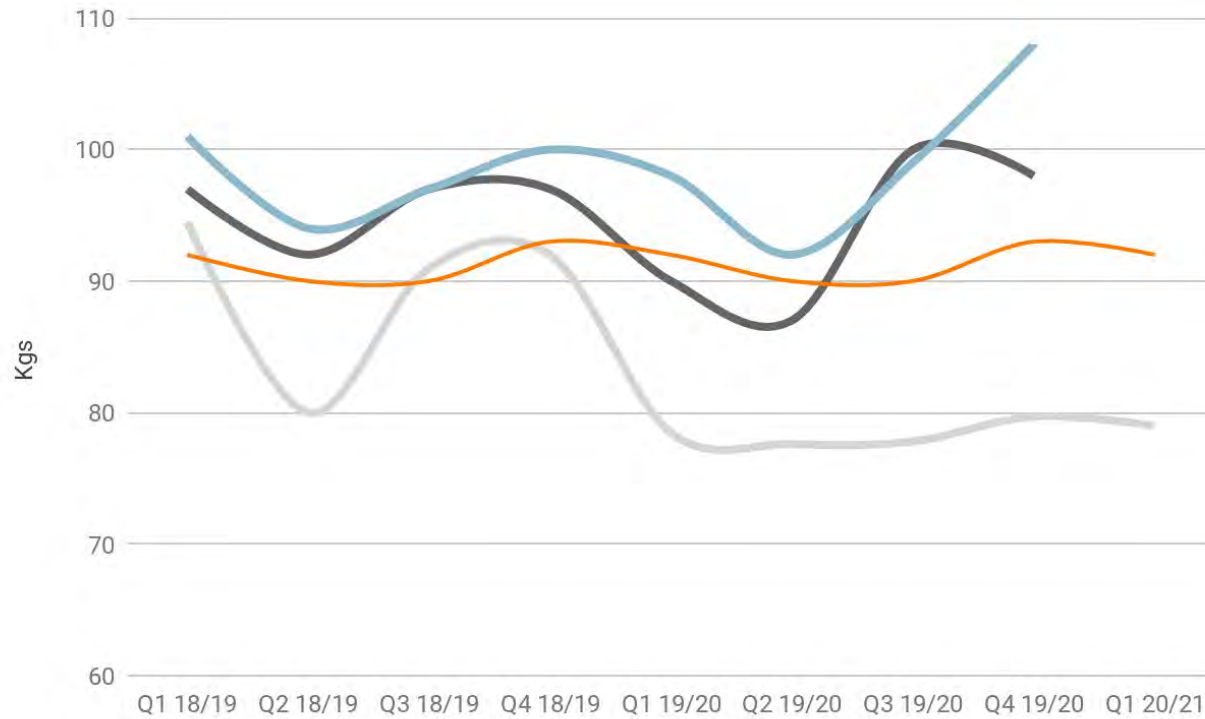
Residual household waste per household (kg)

Target

Cotswold

Forest of Dean

West Oxfordshire

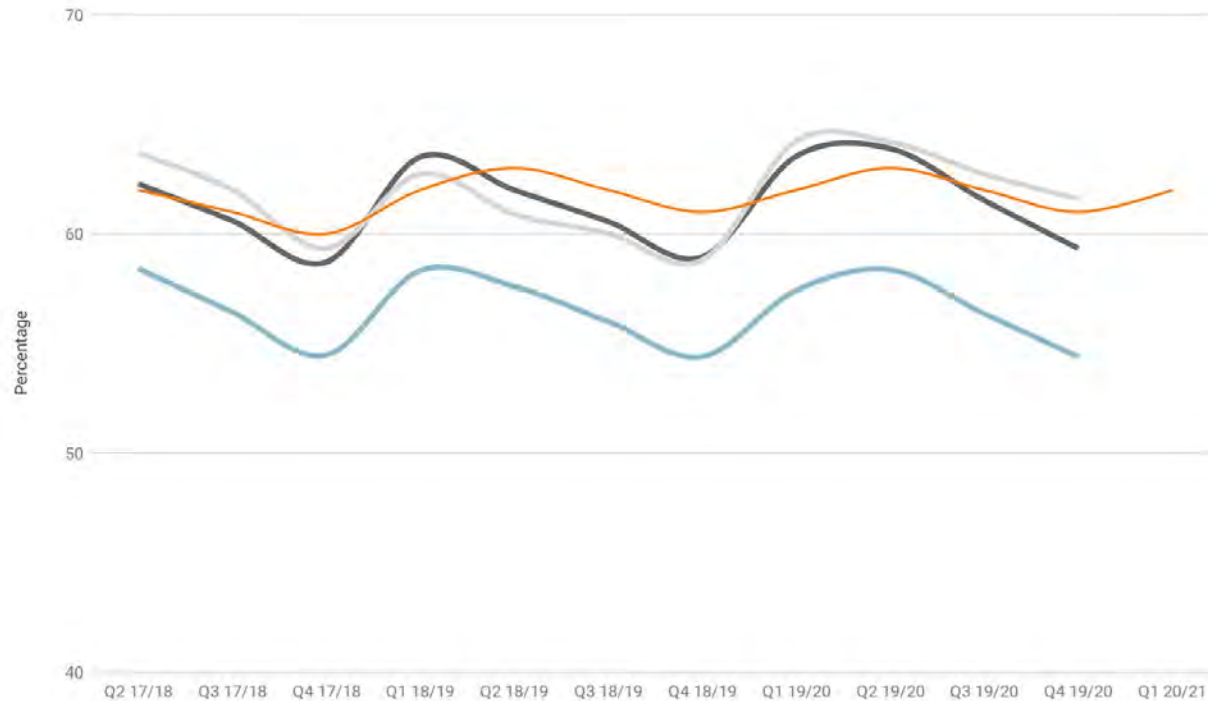


OBSERVATION:

Due to the impact of Covid-19, the amount of waste presented has increased; the Council is collecting all waste presented at the kerbside by residents.

Despite the conditions, the amount of residual waste per household continues to remain relatively low

Percentage of household waste recycled (cumulative)



OBSERVATION:

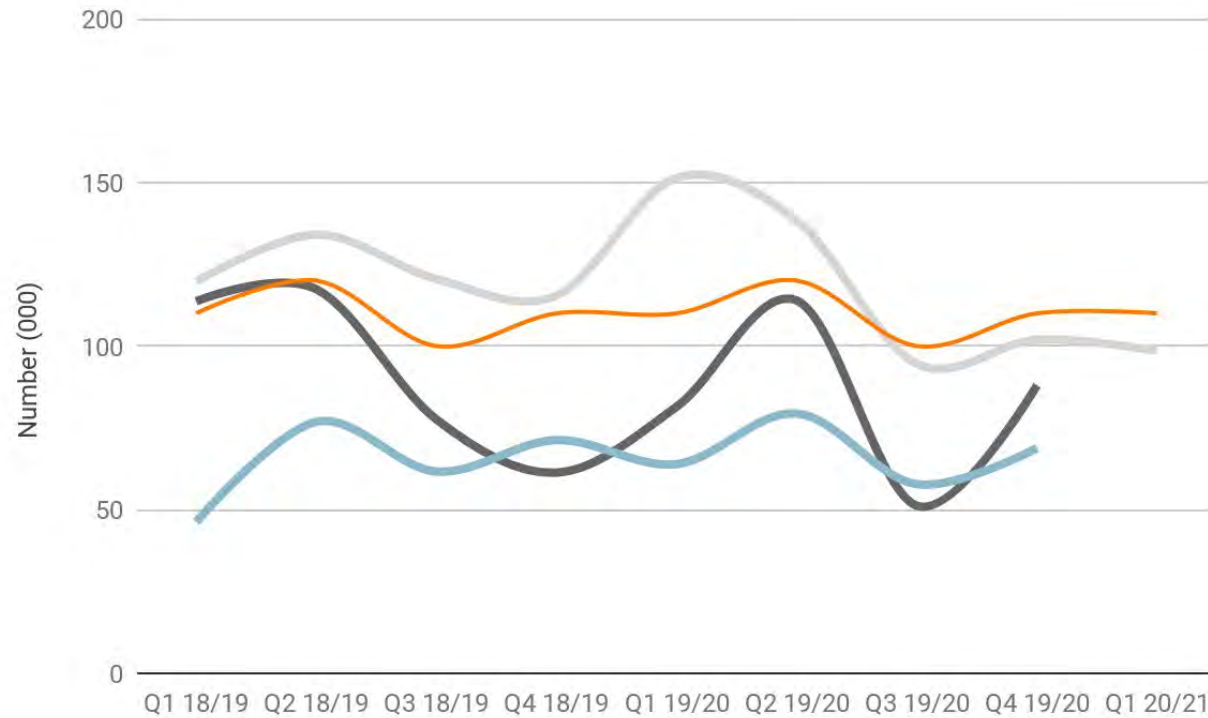
The combined recycling rate was 64.8%, not dissimilar to Q1 of the previous year; the composting rate was 28%, the recycling rate was 24.8% and food recycling rate was 12%.

The service is working closely with UBICO and all waste placed at the kerbside by residents is being collected.

Due to the impact of Covid-19, we are still seeing higher presentation of all types of waste than we would expect at this time of the year. The amount of food waste sent for anaerobic digestion was up over 20% compared to Q1 of the previous year, following the national trend.

Note that the quarterly recycling targets are profiled to account for seasonal differences. The data is also presented cumulatively which will flatten out some of these differences

Number of missed bin per 100,000 scheduled collections



OBSERVATION:

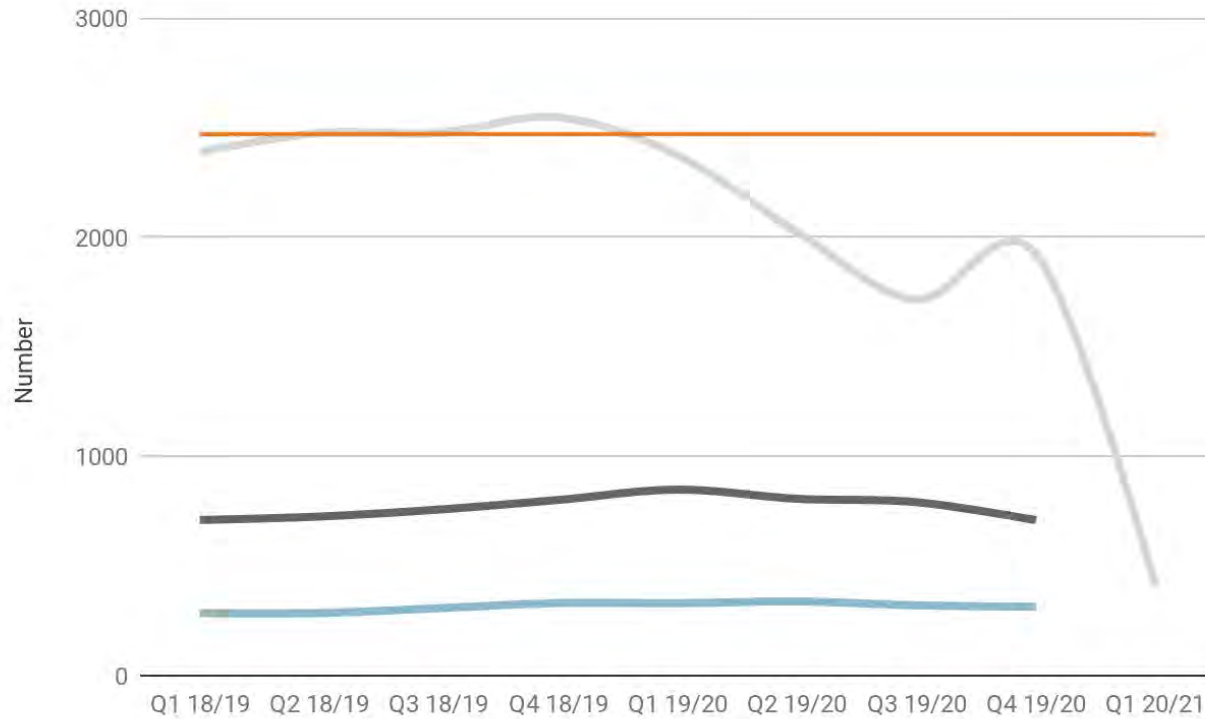
Over the last nine months, performance has improved and remained within the target.

Previously, the service experienced a high staff turnover in waste crews, and the lack of local knowledge amongst new staff and agency staff caused an increase in the number of missed collections.

There was an increase in the number of misses in March 2020 due to staff absences related to Covid-19, and the use of more agency staff. Although the service had anticipated there would be further increases in misses due to increases in waste and recycling tonnage, this has not been the case and performance remains well within the target. The service is working closely with UBICO to reduce the number of missed bins

Parking

Total hours spent undertaking on and off-street parking enforcement visits



OBSERVATION:

This indicator has been set to 'amber' to recognise that enforcement activities were suspended on 23 March until 15 June 2020 due to Covid-19, and staff were redeployed to support communities. There was a phased approach to the return of staff to the service; and two members of staff were shielding.

A light touch approach to enforcement was taken, with just warning letters issued in the first two weeks of the recommencement of service delivery

COMPLAINTS - ARE WE DOING THE 'DAY JOB' REALLY WELL FOR OUR COUNCILS?

● Not upheld



Service area	Description	Outcome/learning	Stage	Decision	Response time (days)
Waste	The complainant cancelled collection of bulky waste items and disposed of the items himself. Terms and conditions state that no refund can be given in these circumstances which the complainant felt was unfair	The service followed the stated terms and conditions. However, on reviewing the case, it was felt that there had been sufficient time to cancel the contractor. A refund was given as a gesture of goodwill	1	Not upheld	3 days
ERS	The complainant, a market trader, felt that he had been treated unfairly following a change in procedure (made necessary by the Covid-19 crisis) which affected the location of his pitch	All market traders were affected by these changes which were necessary in order to comply with the guidance	2	Not upheld	13 days

Planning	Property owner was unhappy with treatment by the planning enforcement team, who had issued an enforcement notice as the complainant's property did not have the correct HMO licence. The complainant felt the nature of the Covid-19 crisis had not been taken into account by the enforcement team, and also felt personally victimised in the treatment he had received	The complainant was informed that there were too many people currently living in the property to be covered by the current licence. Once it became apparent that there was a breach of planning control, and given the nature of the breach, the relevant tests were applied and authorisation was given to issue an enforcement notice with a compliance date that could be achieved in light of Covid-19. The matter of unfair treatment by the enforcement team was fully investigated and no evidence of such treatment was found.	I	Not upheld	4 days
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WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 9
Subject	Consideration of Whether to Proceed with the Woodstock Infrastructure Delivery Strategy
Wards affected	Woodstock and Bladon
Accountable member	Councillor Jeff Haine Cabinet Member for Strategic Planning Email: jeff.haine@westoxon.gov.uk
Accountable officer	Chris Hargraves Planning Policy Manager Tel: 01993 861686; Email: Chris.Hargraves@publicagroup.uk
Summary/Purpose	To consider whether or not Officers should proceed with the preparation of a Woodstock Infrastructure Delivery Strategy Supplementary Planning Document (SPD).
Annexes	None
Recommendation	That the content of the report be noted and it be agreed that either : a) a minor addendum to the West Oxfordshire Local Development Scheme (LDS) be published to confirm that the District Council no longer proposes to prepare a Supplementary Planning Document (SPD) on the topic of infrastructure provision at Woodstock; or b) the West Oxfordshire Local Development Scheme (LDS) should continue to include reference to a Supplementary Planning Document (SPD) on the topic of infrastructure provision at Woodstock but that a minor addendum be published to update the anticipated timescales for preparing the SPD.
Corporate priorities	
Key Decision	No
Exempt	No
Consultees/ Consultation	None

I. BACKGROUND

- I.1. Members will be aware that a large number of new homes are planned at Woodstock including 300 units to the south-east of the town (under construction) 120 units at Hill Rise and 180 units to the north of Banbury Road.
- I.2. Such a level of growth requires careful consideration in terms of future infrastructure requirements and in support of the Local Plan 2031, a District-wide Infrastructure Delivery Plan (IDP) was prepared to identify what infrastructure would be needed to support this planned growth.
- I.3. For Woodstock, the IDP identified particular requirements in respect of additional car parking, water supply and sewage network capacity upgrades, primary and secondary education, sports and leisure facilities including changing accommodation, primary health care, library capacity, Woodstock Water Meadows, public transport (bus services) and emergency services.
- I.4. During the Local Plan examination in 2017/18, the Blenheim Estate who control the three housing sites at Woodstock, made it clear through their representations to the Inspector that a key advantage of the Woodstock allocations was the potential to deliver infrastructure enhancements for the town in a co-ordinated, rather than piecemeal manner.
- I.5. In December 2018, in an update of its Local Development Scheme (LDS) the District Council stated that it intended to *'further consider the preparation of a supplementary planning document (SPD) for Woodstock, dealing with the cumulative impact of planned growth on local infrastructure including for example parking, education and healthcare'*.
- I.6. Subsequently to, and independently of this, in February 2019 the Blenheim Estate and Woodstock Town Council commissioned Community First Oxfordshire (CFO) to consult the community about the current and future infrastructure needs of the Town.
- I.7. Following extensive consultation during 2019, the findings of the CFO work were launched at community events held in November 2019. Their report can be viewed at <https://www.communityfirstoxon.org/woodstock-community-plan/> together with a series of supporting appendices.
- I.8. Key local priorities identified in the CFO report include:
 - A new doctor's surgery with parking on the former police station site at Hensington Road;
 - A new library - potentially as part of a Community Hub;
 - Improve Marlborough School sports facilities, relocating Woodstock FC;
 - Indoor swimming pool;
 - Invest in a pool of electric cars and develop a community transport/ lift-share scheme;
 - Community Development Worker to support new housing developments;
 - Pre-school, primary school and secondary school infrastructure;
 - Road safety improvements on the A44, Old Woodstock;
 - Provision of drop-off areas for cars and school buses in the vicinity of Woodstock Primary and The Marlborough School;
 - Blenheim to provide parking (including coaches) inside Hensington gate;
 - Wider road environment (traffic management, A44 capacity increase);
 - Environmental and low carbon improvements: biodiversity, wildlife habitats and green spaces;
 - Improvement to pavements in the vicinity of Woodstock Primary and The Marlborough School;
 - Public and school transport improvements/ initiatives;

- Multi-storey car park at Hensington Road;
- Increase and improve school parking.

- 1.9. The CFO report also identifies a number of specific local priorities for the Hill Rise and Banbury Road sites including EV charging points, wildlife corridors, renewable energy, footpaths and cycleways, sports and play provision.
- 1.10. In light of the extensive community engagement carried out by CFO on behalf of Blenheim and the Town Council, in a subsequent update of its LDS in December 2019, the Council stated that it would seek to prepare a Supplementary Planning Document (SPD) in the form of a Woodstock Infrastructure Delivery Strategy, *'building on work previously commissioned by the Blenheim Estate through Community First Oxfordshire (CFO) to identify the infrastructure improvements that are needed to support planned growth at Woodstock and how these can be funded and delivered in a co-ordinated and efficient manner'*. This is also included in the Council's current LDS published in May 2020.
- 1.11. Given the extensive nature of the consultation carried out by CFO and in order to avoid duplicating effort, Officers had hoped to be able to effectively 'formalise' the CFO report by publishing and adopting it as a Supplementary Planning Document (SPD).
- 1.12. However, it has become clear through recent discussions with the Blenheim Estate that they do not consider the CFO work can or should be given SPD status and that instead, it should remain in its current form and be used to feed into future discussions and negotiations on potential developer contributions as the two remaining Woodstock allocations come forward.

2. OPTIONS FOR MOVING FORWARD

- 2.1. Clearly the future infrastructure requirements associated with planned housing growth at Woodstock requires very careful consideration.
- 2.2. The West Oxfordshire IDP (2016) provides a useful starting point, identifying a number of issues including primary health care, education, sports and leisure, library capacity and public transport.
- 2.3. The more recent CFO work carried out in 2019 is based on extensive community engagement and very usefully identifies a number of key local priorities as outlined above. There is also some clear overlap with the findings of the Council's IDP.
- 2.4. Given that the Blenheim Estate have expressed concerns about formalising the CFO work and giving it SPD 'status' Officers consider that there are two main options for proceeding.

Option 1 – Update the West Oxfordshire IDP

- 2.5. The first option is to update the West Oxfordshire IDP to reflect the findings of the CFO work as well as discussions with relevant infrastructure providers and statutory bodies including Oxfordshire County Council, OCCG, public transport providers, Thames Water etc.
- 2.6. Whilst the IDP does not have 'SPD' status, it is a valid and material consideration that can quite reasonably be used alongside the CFO work to help agree the future infrastructure 'package' needed to support planned growth at Woodstock.
- 2.7. An updated draft of the IDP could also be the subject of informal consultation with relevant parties including Blenheim and Woodstock Town Council.
- 2.8. Under this option, a minor addendum to the Council's Local Development Scheme (LDS) would be published to confirm that the Council no longer proposes to prepare a Supplementary Planning Document (SPD) on the topic of infrastructure provision at Woodstock but will instead, seek to update its IDP accordingly.

Option 2 – To Prepare a Woodstock Infrastructure Delivery Strategy Supplementary Planning Document (SPD)

- 2.9. The second option is to prepare a new SPD dealing with the issue of infrastructure provision at Woodstock. This would effectively be a similar exercise undertaken by CFO in 2019, inviting views from the local community about what they consider to be the main infrastructure needs of the Town to support future growth. As with the IDP update under Option 1 above, the views of statutory bodies would also be sought.
- 2.10. Unlike an update of the Council's IDP, a Supplementary Planning Document would need to be subject to formal public consultation in line with legislative requirements and is likely to take around 4-6 months to complete.
- 2.11. It is understood that planning applications for the two remaining Woodstock allocations are likely to be submitted in the next couple of months meaning that they are likely to run-ahead of any SPD being formally adopted.
- 2.12. Officers also consider that there is a risk of 'consultation fatigue' with the local community having been asked to express their views on this topic as recently as 2019, now effectively being asked the same question.
- 2.13. Under this option, the Council's Local Development Scheme (LDS) would continue to include reference to the Woodstock Infrastructure Delivery Strategy Supplementary Planning Document (SPD) but a minor addendum would be published to update the anticipated timescales for preparing the SPD.

Recommended Way Forward

- 2.14. Officers recommend that Option 1 is pursued with the CFO work remaining as is, in terms of status and content and being reflected in an updated version of the District Council's Infrastructure Delivery Plan (IDP).
- 2.15. Both documents would then be used to guide future discussions with the Blenheim Estate and Woodstock Town Council regarding the infrastructure package needed to support the Hill Rise and Banbury Road allocations as they come forward.
- 2.16. Option 2 – the preparation of a separate SPD, could be pursued but Officers consider that there is a real risk of consultation fatigue with the local community being asked for their views so soon after the CFO work in 2019 as well as a risk that the work will not be able to be concluded until well after planning applications have been received for the Hill Rise and Banbury Road sites, both of which are expected in the near future.
- 2.17. This option also raises resource implications, with Officers already engaged in preparing four other SPDs for the various strategic housing sites in the Local Plan as all as two topic-based SPDs on Affordable Housing and Developer Contributions and potentially a further SPD in respect of Hanborough Station.

3. FINANCIAL IMPLICATIONS

- 3.1. This report has no financial implications.

4. LEGAL IMPLICATIONS

- 4.1. This report has no legal implications.

5. RISK ASSESSMENT

- 5.1. The report raises no specific risks of any significance.

6. ALTERNATIVE OPTIONS

- 6.1. The two options for proceeding are set out in the report.

7. BACKGROUND PAPERS

- 7.1. Woodstock Community and Infrastructure Delivery Plan 2019 – Community First Oxfordshire <https://www.communityfirstoxon.org/wp-content/uploads/2019/10/CFO-Woodstock-CID-Report-vfinal.pdf>



WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 10
Subject	Government White Paper: Planning for the Future
Wards affected	ALL
Accountable member	Councillor Jeff Haine Cabinet Member for Strategic Planning Email: jeff.haine@westoxon.gov.uk
Accountable officer	Chris Hargraves Planning Policy Manager Tel: 01993 861686; Email: Chris.Hargraves@publicagroup.uk
Summary/Purpose	To agree a response to the Government's White Paper: Planning for the Future.
Annex	Annex A – Proposed response to the White Paper
Recommendation	That the content of the report be noted, and the proposed response to the White Paper attached at Annex A be approved, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.
Corporate priorities	
Key Decision	No
Exempt	No
Consultees/ Consultation	Internal consultation with various Officers at West Oxfordshire District Council and also at Cotswold District and the Forest of Dean.

I. BACKGROUND

- 1.1. The Government has recently published a White Paper: Planning for the Future which sets out a number of significant changes which are intended to streamline and modernise the planning system, improve outcomes on design and sustainability, reform developer contributions and ensure that more land is available for development where it is needed.
- 1.2. The White Paper covers a number of issues including plan-making, development management, development contributions and other related policy proposals. It is the subject of a 12 week public consultation which closes on 29 October 2020.
- 1.3. This report provides a brief overview of the White Paper proposals together with the view of Officers.
- 1.4. Attached at Annex A is a draft WODC response to the White Paper structured around the proposals and specific consultation questions contained therein. Some general comments are also provided as appropriate.
- 1.5. The Development Control Committee will be considering this report at its meeting on 21 September, and its views will be reported. Members are asked to agree [Annex A](#) as the District Council's formal response to the White Paper consultation, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.

2. WHITE PAPER: PLANNING FOR THE FUTURE; A SUMMARY OVERVIEW

- 2.1. The White Paper is relatively succinct (63 pages – web accessible version) but contains a raft of significant proposals that have major implications for how the planning system and local planning authorities operate in England.
- 2.2. It is clearly intended to create a radical shake-up of the planning system and given some of the concerns it raises, particularly the amount of control that will be relinquished by local authorities if the proposals are taken forward, it requires a suitably robust response.
- 2.3. By way of introduction, the White Paper cites a number of problems with the current planning system including its complexity, lack of rules-based decision-making, lengthy plan-making processes, loss of public trust, out-of-date technology, a complex and unclear process for negotiating developer contributions, an insufficient focus on design and a failure to deliver enough new homes.
- 2.4. It suggests that the planning system needs to be better at unlocking growth, encouraging beautiful new places, supporting the stewardship and rebirth of town and city centres, revitalising existing buildings and supporting new development. It also needs to move towards a modernised, open data approach.
- 2.5. It identifies the following specific objectives:
 - Being more ambitious; expecting development to be beautiful and create 'net gain' not just 'no net harm';
 - Giving communities an earlier, more meaningful voice as plans are made, harnessing digital technology to improve accessibility and understanding of information;
 - Making planning information easier to find and understand including greater use of digital information and platforms;
 - Supporting home ownership and increasing the supply of housing land where it is needed to address affordability, create competition in the housing market and to support economic growth and urban renewal;

- Helping businesses to expand with readier access to commercial space and supporting a more physically flexible labour market;
- Supporting innovative developers and housebuilders including small and medium-sized enterprises (SMEs) and self-builders and those looking to provide more diverse types and tenures of housing;
- Promoting the stewardship and improvement of the countryside and environment, preserving important natural assets, maximising the use of brownfield land, supporting net gains for biodiversity and actively addressing climate change;
- Supporting the ongoing renewal of urban areas through ‘good growth’ with more homes at gentle densities in and around town centres and high streets on brownfield land and near existing infrastructure.
- Modernising the day to day operation of the planning system through digitisation – real time information, virtual simulation, greater use of data and straightforward end to end processes.

2.6. In seeking to take these objectives forward, the White Paper is split into three main ‘pillars’ which include 22 specific proposals:

- Pillar One – Planning for development
- Pillar Two – Planning for beautiful and sustainable places
- Pillar Three – Planning for infrastructure and connected places

2.7. There is also a section on delivering the changes which includes two further specific proposals.

Pillar One – Planning for development

2.8. Pillar One includes 10 proposals which focus primarily on plan-making (i.e. Local Plans) but also raise implications for development management, neighbourhood planning and housing delivery.

2.9. A new, simplified role for Local Plans is proposed together with a new process for making them. Plans will be stripped back to focus on identifying three types of land; *Growth* areas ‘suitable for substantial development’ (e.g. new settlements, urban extensions and areas for redevelopment), *Renewal* areas ‘suitable for development’ (e.g. existing built areas where smaller scale development is appropriate) and *Protected* areas where more stringent control over development is needed (e.g. Green Belt, AONB and areas of open countryside outside of land in *Growth* or *Renewal* areas). All areas of land would be put into one of these three categories.

2.10. Importantly, within identified *Growth* areas, outline planning permission would automatically be granted in principle once the Local Plan has been adopted, with detailed planning permission then needing to be secured through one of three options (a reformed reserved matters process, a Local Development Order or for exceptionally large sites, a Development Consent Order).

2.11. Within identified *Renewal* areas, there would be a general presumption in favour of development with consent granted in one of three ways; automatic consent for pre-specified forms of development, a fast-track application process for other forms of development or through a Local or Neighbourhood Development Order.

2.12. In *Protected* areas, development proposals would come forward as they do now (i.e. through a planning application) and would be judged against policies set out in the NPPF.

- 2.13. The intention is that new Local Plans will be more visual, map based and standardised nationally, comprising an interactive web-based map with a key and accompanying text setting out what is permissible and where. This will need to be made available in a range of different formats e.g. to enable smartphone accessibility.
- 2.14. Policies will be kept to a minimum, focusing on issues such as height and density limits with the majority of policies for development management to be set out in an updated NPPF rather than the Local Plan. This will be supported by a much greater emphasis on locally produced design codes and guides which can be included as part of Local Plans or as supplementary planning documents.
- 2.15. Importantly, the White Paper makes it clear that the Government wants to move to a position where all development management policies and design code requirements at national, local and neighbourhood level are written in a machine-readable format to increase clarity and enable automation of more binary considerations.
- 2.16. The existing 'tests of soundness' that Local Plans are considered against at examination would be replaced with a single 'sustainable development' test. The current requirement for Sustainability Appraisal (SA) would be replaced with a simplified alternative, the duty to co-operate test would be removed and there would be an increased emphasis on effective infrastructure planning.
- 2.17. The proposals place a strong emphasis on faster decision-making both for planning applications and local plan preparation. For determining planning applications, the intention is to more consistently adhere to deadlines through the use of improved digital technology and shorter, more standardised applications supported by much less background information and greater use of delegated approval.
- 2.18. To incentivise local authorities to determine applications in a timely manner, the White Paper identifies some potential penalties such as the refund of planning fees and deemed approval of certain types of development if deadlines are not met. Notably, where applications are refused, the White Paper proposes that applicants will be refunded their planning fee if successful at appeal.
- 2.19. In respect of timescales for Local Plans, the White Paper suggests that plans should be completed in 30 months or less, based on five key stages with the draft plan being submitted for examination and published for comment simultaneously (rather than published for comment and then submitted under current arrangements). Plans would then need to be reviewed at least every 5-years as per the current position. Failure to achieve these timescales is likely to lead to Government intervention.
- 2.20. The White Paper proposes to continue with the principle of a standardised method for establishing housing need (albeit calculated in a new manner) and to use this as the basis for agreeing a 'binding housing requirement' that would factor in land constraints such as Green Belt.
- 2.21. In West Oxfordshire, the new standard housing method identifies a requirement for 653 new homes per year prior to consideration of any land constraints.
- 2.22. Neighbourhood Planning is proposed to be retained but potentially re-focused to reflect the proposed changes to Local Plans as well as the opportunities presented by digital tools and data.
- 2.23. The White Paper also identifies a need to speed up the delivery of development and proposes to amend the NPPF accordingly (e.g. support for varied development types and multiple builders on larger sites).

Officer Response

- 2.24. The proposals have some merit but also raise a number of significant concerns.

- 2.25. In terms of Local Plan making, Officers agree that a more rapid and streamlined approach is achievable and that combining the publication and submission of a local plan as proposed is sensible. However, to expect a local authority to complete a local plan in 30 months is likely to prove extremely challenging particularly given that in doing so the authority will be expected to produce sufficient evidence to justify the granting of outline planning permission in identified growth areas upon adoption of the plan.
- 2.26. There will also be additional time and resource implications associated with the increased emphasis which is being placed on design code work and masterplanning. This all needs to be recognised and worked through in the form of a practical example for a typical local authority before a specific time-limit for plan-making is imposed.
- 2.27. The principle of making Local Plans more visually engaging, interactive, map-based and accessible in a range of formats is supported, as are the proposals to simplify the approval process at examination, remove the duty to co-operate and reduce the amount of evidence needed to justify the plan including Sustainability Appraisal.
- 2.28. However, there seems to be a direct conflict between the idea of local plans granting outline planning permission for identified growth areas and the relaxation of evidence needed to support local plans. If the plan-making stage is effectively to be used to circumvent the need for outline planning permission in major growth areas, surely it would need to be supported by more rather than less evidence.
- 2.29. The increased emphasis on infrastructure planning is supported and this should be a mandatory element of plan-making. Increased use of locally derived design codes and guides is supported in principle, particularly where community engagement is mandatory, however it raises significant concerns in terms of the inevitable resource implications for local authorities in having to produce or commission a significant volume of additional work (see further comments below).
- 2.30. Key elements of Proposals 1, 2, 5 and 7 raise significant concerns in respect of the manner in which plan making is proposed to be stripped back, standardised and automated in a blanket manner that will inevitably mean local circumstances and priorities are overlooked and that the role of democratically elected local members in serving their local constituents will be significantly diminished.
- 2.31. Local Plans already identify areas of potential growth, renewal and protection and should clearly continue to do so, potentially supported by permission in principle for some, limited forms of more minor development. However, for Local Plans to effectively do no more than delineate 3 types of land category and be limited to providing guidance on a limited range of issues such as building heights and densities will remove the opportunity for local authorities to address key local priorities such as biodiversity gain and zero carbon through appropriately derived and locally evidenced policies.
- 2.32. It is fully accepted that Local Plans should not duplicate the content of the NPPF. However, this does not mean the ability for local authorities to set locally specific policies should be removed. Instead, it should be made clearer in the NPPF and associated practice guidance that policies which simply repeat or mirror the NPPF will not be considered sound.
- 2.33. The White Paper suggests that plan making and associated decision making can effectively become a standardised, data-driven and largely automated process and this raises obvious concerns because no one area is the same and local priorities and needs will vary. The planning system inevitably involves a strong degree of professional judgement and expertise as well as the oversight of democratically elected members. To suggest that this is some sort of burden which slows down decision-making and should therefore be stripped right back to enable binary 'yes/no' choices is entirely inappropriate.

- 2.34. Officers suggest that a far more appropriate way forward would be a reasonable balance between the current system of plan making and some of the proposals set out in the White Paper.
- 2.35. Certainly there is scope to streamline and speed the process up by reducing the procedural and technical requirements which currently slow local authorities down. There is also scope to make plans more visually engaging, interactive, responsive and accessible. This would clearly be in everyone's interest.
- 2.36. However, to strip the system back as much as is proposed with a view to having a 'standardised' approach across the Country, will inevitably mean that important local priorities and needs are overlooked and that those members who are democratically elected to represent the interests of their constituents will have very little say or control over what happens in their local areas.
- 2.37. Significant concerns are raised about the proposals to automatically grant outline planning permission for substantial development within identified growth areas. Whilst the current process of allocating land for development through local plans already establishes the principle of development, this is very different to an outline planning application which, for large sites, will often be supported by extensive evidence and detailed masterplanning looking at key issues such as phasing of development and the provision of supporting infrastructure.
- 2.38. Whilst the desire to speed up decision making is acknowledged, there will be greatly increased pressure on local authorities to produce sufficient evidence to justify the granting of outline planning permission upon adoption of their Local Plan. This appears to run in direct conflict with the other proposals set out in the White Paper which seek to reduce the evidential burden associated with the examination of Local Plans.
- 2.39. In terms of the other proposals set out in this part of the White Paper, Officers are generally supportive of the principle of a standardised approach to establishing housing need insofar as if a successful method could be rolled out, it would significantly reduce the amount of time and expense spent debating such matters at examination. However, it is essential that the limitations of such an approach are fully recognised and that it is seen as a starting point only, so that in establishing a local authority's specific housing requirement, proper consideration of local circumstances and constraints is taken into account.
- 2.40. Also supported is the stronger emphasis on build-out in new development, the retention of neighbourhood planning and the need to ensure timely development management decisions through greater levels of delegation, improved technology and more concise, standardised supporting information. It is essential however that this is not at the expense of quality and does not lead to important local issues being overlooked.
- 2.41. Significant concerns are raised about the financial implications of planning fees having to be returned if decision-making deadlines are not met (something which is often beyond the control of the local authority) as well as the prospect of applicants being able to recoup their planning fee if they are successful at appeal.
- 2.42. There is no evidence to suggest that financially penalising the authority would in any way improve decision making by planning committees and as such, it would be inappropriate to do so. It is simply likely to lead to an increase in the number of planning appeals lodged and a general 'clogging-up' of the system.

Pillar Two – Planning for beautiful and sustainable places

- 2.43. Pillar Two focuses primarily on design issues but also touches on climate change, environmental protection and heritage.

- 2.44. In terms of design, the White Paper places significant emphasis on the preparation of local design guides and codes, prepared with input from local communities and having regard to the existing National Design Guide, a soon to be published National Model Design Code and a revised and consolidated Manual for Streets.
- 2.45. A new expert body will be established to help local authorities make effective use of design guidance and codes and further proposals will be brought forward to ensure local authorities have the right skills and resources in place including the establishment of a chief officer for design and place making in each authority. Homes England will also be required to give greater weight to design quality in their activities and programmes of work.
- 2.46. Importantly, the White Paper proposes that high quality developments are 'fast-tracked' through the planning process in three ways. First the NPPF will be updated to give advantage to schemes that comply with local design codes and guides.
- 2.47. Second, where Growth areas are identified in Local Plans, a masterplan and site-specific code will need to be agreed as part of any permission in principle and in place prior to detailed proposals coming forward. These masterplans and codes should be prepared by the local planning authority.
- 2.48. Third, the nature of permitted development will be widened and changed to enable popular and replicable forms of development to be approved easily and quickly, enabling fast delivery of proven popular designs, fostering innovation and supporting industrialisation of house building enabling modern methods of construction to be deployed at scale. This would be taken forward through the development of a limited set of form-based development types which would benefit from permitted development rights relating to the settings in which they apply.
- 2.49. Prior approval of certain issues e.g. materials would still be needed and local planning authorities or neighbourhood planning groups would be able to use local orders to modify how these standard development types would apply in their area based on local evidence of opinion.
- 2.50. The White Paper also proposes to ensure that the reformed planning system plays a proactive role in promoting environmental recovery and long-term sustainability. The NPPF will be amended to ensure a focus on mitigating and adapting to climate change and maximising environmental benefits as well as ensuring that the significance of listed buildings and conservation areas is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. Better ways of securing consent for routine works are to also be explored.
- 2.51. The process for assessing environmental impacts (e.g. SA/EIA) is proposed to become quicker and simpler although no details are provided and will be the subject of further consultation in the autumn.
- 2.52. The White Paper also suggests it will facilitate ambitious improvements in the energy efficiency standards for buildings although details are light on the actual measures to be put in place much of which appears to be the subject of further, separate consideration including through the Future Homes Standard – the Government's first step towards net zero homes.

Officer Response

- 2.53. The proposals set out under Pillar Two of the White Paper again have some positives but also raise some very serious concerns. Officers are supportive of the principle of locally prepared design codes and design guides, which will be particularly important if the proposals to streamline local plan making through a zonal approach to growth are taken forward and development management policies are deferred to the NPPF.

- 2.54. However, the White Paper vastly underplays the additional resource requirements associated with this shift in emphasis. Design codes and guides are not quick or easy to produce and yet the White Paper infers that with a little re-training, those whose current role within the planning system may change can suddenly become urban design and master planning experts. In reality it will not be that simple and local authorities are likely to find themselves deluged with requests from local communities to engage with them on design-based matters and unable to offer adequate support and guidance.
- 2.55. Officers agree that a new body should be established to support local authorities with design issues and that Homes England should factor in the importance of high quality design and place-making alongside their other strategic objectives.
- 2.56. The principle of amending and updating the NPPF to ensure a stronger focus on climate change and maximising environmental benefits is supported. However, very little detail is provided as to what this will actually entail and as such it is difficult to comment meaningfully at this stage.
- 2.57. The concept of simplifying the assessment of environmental impacts for both plan-making and decision-taking is also supported, as are the proposals to achieve a step change in the environmental and energy efficiency performance of new buildings.
- 2.58. Concerns are however raised in a number of respects. In particular, Officers are concerned about the proposal to fast track well-designed schemes through the planning system.
- 2.59. New developments should already be underpinned by high quality standards of design. This is not a new concept and has been embedded in national and local policies for many years. To suggest that suddenly, an advantage will be awarded to high quality designs in terms of the time taken to achieve consent does not seem appropriate or necessary. Whilst good quality design is vitally important, it is just one component of sustainable development and should be seen as 'trumping' all other considerations of good planning.
- 2.60. Officers agree that well-designed schemes should be looked upon favourably, however would question whether this alone should mean they enjoy a swifter route through the planning system. Surely, all elements of achieving sustainable development and effective place-making should be given equal weight?
- 2.61. Also of concern is the concept of allowing replicable 'pattern book' development to be taken forward and approved quickly with pre-approval of popular and replicable designs through permitted development.
- 2.62. Whilst the basic, central tenets of good design including building types, heights, set-backs etc. are clearly transferrable, to expect whole 'pattern book' developments to be imported into proposed renewal areas, surely runs the risk of standardised 'anywhere' development that does not fit in with or take account of the local context and setting.
- 2.63. The Government has already significantly extended permitted development rights in recent years leading to questionable development including some office to residential conversions. To further extend these rights so that potentially large-scale developments can be fast-tracked with little scrutiny and local input from democratically elected Members is not appropriate or supported. The White Paper makes reference to such proposals enabling an 'industrialisation of housebuilding' which is extremely worrying for a predominantly rural area such as West Oxfordshire.
- 2.64. Finally concerns are raised in respect of the treatment of the historic environment, in particular the potential to miss unknown or unidentified heritage assets in Local Plans, the resource implications associated with updating local plans to ensure such assets are properly recorded including mapping and the proposals to 'fast-track' routine works to

listed buildings, because in reality every building is different with its own unique set of characteristics.

- 2.65. Concerns are also raised about the possibility of those with a vested interest earning autonomy from routine listed building consents as well as the proposed implications of adapting / retro-fitting historic buildings to address climate change without due consideration and scrutiny.

Pillar Three – Planning for infrastructure and connected places

- 2.66. The third pillar of the White Paper focuses on the provision of infrastructure, with a package of significant reforms to the current system of developer contributions (S106 and CIL) which is seen to be uncertain, opaque, inconsistent and inflexible.
- 2.67. The White Paper identifies that developer contributions should be responsive to local needs, transparent, consistent and simplified and buoyant (so that when prices go up the benefits are shared and when prices go down there is no need to re-negotiate). It also suggests that the Government could potentially seek to use developer contributions to capture a greater proportion of the land value uplift that occurs through planning permission and use this to enhance infrastructure delivery.
- 2.68. The White Paper proposes that the current system of planning obligations (S106) and CIL is abolished and replaced with a new, nationally set charge (single or area-specific) based on the value of the development as a fixed proportion over a certain threshold. The charge would be levied at the point of occupation and revenues would continue to be collected and spent locally. Where the value of development is below the threshold, no levy would be charged.
- 2.69. Local authorities would be allowed to borrow against revenues from the levy to forward fund infrastructure. The scope of the levy would be extended to include changes of use which require planning permission even where there is no additional floorspace and for some permitted development rights including office to residential conversions.
- 2.70. Importantly the White Paper makes it clear that any reformed levy would continue to deliver on-site affordable housing at least at present levels. This could be secured through in-kind delivery on-site with local authorities able to specify the form and tenure of provision. Affordable homes would be sold to a provider at a discounted rate with the difference between the sold price and the market price then being offset from the amount of levy payable, thus acting as an incentive for on-site provision.
- 2.71. The White Paper also identifies the potential for greater flexibility in the use of infrastructure levy payments. The current approach whereby local communities are passed from 15% - 25% (depending on whether they have a neighbourhood plan in place) will be retained and local authorities may be able to spend the levy on their policies priorities once core infrastructure obligations have been met e.g. they may wish to improve services or reduce Council Tax.

Officer Response

- 2.72. The proposals set out in this Section raise a number of significant concerns. Although there is clearly scope to improve the current system of developer contributions, to effectively scrap it and replace it with a new, nationally set tariff in the form of an 'Infrastructure Levy' is not supported.
- 2.73. Instead, the focus should be on finding ways to improve the current system of developer contributions including Section 106 agreements to make the process quicker and more transparent with less duplication.
- 2.74. Whichever approach to developer contributions is taken, it is essential that any uplift in land value is properly captured. The increase in value over and above existing agricultural

land value for undeveloped greenfield sites in particular is huge and it is only right that a good proportion of that uplift is captured and available to support the provision of necessary supporting infrastructure.

- 2.75. Officers agree that that if a reformed levy is taken forward, both changes of use which require planning permission and those which are permitted development such as office to residential conversions should be required to make a contribution towards infrastructure.
- 2.76. Whichever mechanism is used to secure affordable housing it is essential that the amount of new affordable housing provided is at least as much as currently happens and preferably, more given the acute need for affordable housing in many areas.
- 2.77. The priority should be for on-site provision and it is vital that financial contributions made through the proposed infrastructure levy are not seen as a convenient way of avoiding having to provide new affordable homes on-site.
- 2.78. Any system of developer contribution should focus on the provision of affordable housing and the range of new and enhanced infrastructure that is needed to support new development.
- 2.79. Providing local authorities with more flexibility including the opportunity to spend levy receipts on improved services or reducing Council Tax is not supported as there is a clear risk that these key priorities may be sidelined.

Delivering Change

- 2.80. The final section of the White Paper deals with some of the practicalities of introducing the proposed changes and makes it clear that whilst the Government is keen to make rapid progress toward the new system, it will consider appropriate transitional arrangements depending on the consultation responses received.
- 2.81. It also places an emphasis on better use of surplus public sector land and innovation in delivery including the potential use of development corporations. Having the right skills in place within local authorities is identified as essential, with a comprehensive resources and skills strategy for the planning sector to be produced to support the implementation of the proposed reforms.
- 2.82. Planning fees will continue to be set nationally and if the new infrastructure levy proposal is brought forward, local authorities will be able to use a small proportion to cover their overall planning costs including plan-making and design codes and enforcement activities.
- 2.83. Outdated regulations which unnecessarily increase costs for local authorities will be removed and local authorities will be subject to a new performance framework which ensures continuous improvement across all planning functions.
- 2.84. Enforcement powers and sanctions will be reviewed and strengthened with local authorities being expected to place more emphasis on the enforcement of planning standards and decisions.

Officer Response

- 2.85. The proposals set out in this section are generally supported, in particular the proposals to strengthen the enforcement powers and sanctions available to local authorities and the development of a new resources and skills strategy to support the implementation of the proposed reforms within the planning sector.
- 2.86. However, in general terms the White Paper significantly underplays the burden that the proposals are likely to place on local authorities, in particular the additional resources that will need to be provided or commissioned to support a raft of new design guide and codes and masterplanning for proposed local plan growth areas.

3. FINANCIAL IMPLICATIONS

- 3.1. This report has no financial implications.

4. LEGAL IMPLICATIONS

- 4.1. This report has no legal implications.

5. CLIMATE CHANGE IMPLICATIONS (IF REQUIRED)

- 5.1. The White Paper addresses the issue of climate change in a number of areas including a commitment to strengthening the NPPF to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

6. ALTERNATIVE OPTIONS

- 6.1. The report and response set out the reasoning for the proposed comments. Cabinet is free to add to or vary those comments as it sees fit.

7. BACKGROUND PAPERS

- 7.1. Planning White Paper – Planning for the Future (August 2020) - <https://www.gov.uk/government/consultations/planning-for-the-future>

WODC proposed response to Planning White Paper – Planning for the Future

Pillar One - Planning for development

Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.

5. Do you agree that Local Plans should be simplified in line with our proposals?

In general terms, the Government's commitment to retaining a plan-led system is welcomed but the Council considers that the proposals go much too far in terms of 'stripping back' the function, role and responsibility of local authorities for effective plan-making.

Local Plans provide the opportunity to articulate local priorities and aspirations in a spatial manner, established through a vision, objectives, policies and overall strategy. Good plans look beyond just the use of land and adopt an integrated, spatial approach linking up with other related areas including health and well-being, transport, nature recovery and climate change.

The White Paper proposals suggest that Local Plans will effectively adopt a simplistic zonal approach, identifying land for growth/renewal and protection and doing no more than that, other than some succinct guidance on what is permissible and where. The vast majority of policies used for development management will be stripped out and deferred to national policy.

This is not appropriate and will remove the ability of local authorities to effectively address key local priorities. An automated 'one-size fits all' type approach, whilst attractive in some respects on paper, in reality, will mean that the issues of most importance to local communities are likely to be glossed over and not able to be addressed.

The planning system inevitably involves a strong degree of professional judgement and expertise as well as the oversight of democratically elected members. To suggest that this is some sort of burden which slows down decision-making and should therefore be stripped right back to enable binary 'yes/no' choices is entirely inappropriate.

Notwithstanding the Council's 'in principle' concerns about simplified plan-making, there are some specific comments about the detail of the proposals which we wish to make.

The proposals envisage that growth areas suitable for substantial development will be identified in new-style local plans and that such areas would benefit from outline planning permission upon adoption. The evidence base required in support of Local Plans is already significant and if the expectation is for local authorities to provide sufficient evidence to effectively grant outline planning permission, the resource implications of this need to be recognised – particularly in light of the relatively rapid timetable of 30 months for new style local plans highlighted elsewhere in the White Paper (see comments below).

The White Paper suggests that the term 'substantial development' will be defined in policy to remove any debate. This is vital and should be clarified as soon as possible. If growth areas are to include new settlements, urban extensions and areas for redevelopment, this could range in size from say 50 homes to 5,000 homes and it will be essential to get the definition right from the outset if the proposals are taken forward.

The White Paper suggests that for growth and renewal areas, the key and accompanying text would set out suitable development uses as well as limitations on height and/or density as relevant. The inference is that this text/guidance will be minimal which raises obvious concerns in respect of larger development proposals.

If a Local Plan were to identify for example a new settlement of 5,000 new homes which upon adoption of the plan, becomes an outline planning permission, presumably the key and supporting text of the plan would need to be comprehensive and supported by a raft of evidence rather than in the form of some brief guidance on height and density and signposting of suitable uses as is currently suggested.

The commitment to excluding areas of flood risk from growth areas is welcome but more clarity is needed. Often with larger sites, there are areas of flood risk within the site but this does not prevent development coming forward. Presumably the onus will be on the local authority to produce flood risk evidence to justify any growth areas that include any risk of flooding, the resource implications of which again need to be recognised.

The more stringent approach highlighted in respect of protected areas such as Green Belt and AONB is welcome however it is unclear how this would apply in practice. The paper suggests that some areas would be defined nationally and others locally on the basis of national policy. Does this mean that there will be a standard NPPF policy on development within all AONBs for example? If so, how could such an approach possibly reflect the differences between different AONBs and the local priorities and objectives for each?

The concept of an interactive web-based map with easily searchable policies is supported but is not new. Many local authorities already have such systems in place but it is acknowledged that this should become mandatory and potentially standardised to assist with automation and those wishing to interrogate multiple plans.

Regarding allowing sub-areas within Growth areas to be created specifically for self- and custom-build homes, and community-led housing developments, powers should be provided to local authorities to make such designations in circumstances where the landowner is seeking a more profitable land use. It is desirable to avoid a situation where the Council is willing to designate sub-areas for custom-build homes and community-led housing developments but is unable to do so due to the unavailability of sites.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

Whilst the Council fully acknowledges that development management policies set out within Local Plans should not simply repeat national policy, it does not agree that such policies should be removed from Local Plans altogether.

Good local plan policies seek to articulate local priorities in a positive and constructive manner. They do not simply seek to resist or control development in an overly prohibitive manner. There will be numerous examples of well-crafted local plan policies that put a specific, local perspective on key issues such as heritage, biodiversity and landscape and to elevate such policies to a series of generic, standardised policies within the NPPF would severely hamstring local authorities from being able to address the issues of most importance in their local areas.

As such, the District Council would support the alternative option identified in the White Paper which is to maintain the current approach of including development management policies within Local Plans but making it clear that policies which repeat the NPPF will be stripped out.

Proposal 3: Local Plans should be subject to a single statutory ‘sustainable development’ test, replacing the existing tests of soundness.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

In principle, the District Council is supportive of the idea of simplifying the process for examining and approving Local Plans. However, no detail is provided as to what the new ‘sustainable development’ test would look like and what issues it would cover, or the type of process envisaged for the simplified alternative to Sustainability Appraisals.

Similarly, whilst the White Paper suggests removal of the duty to co-operate, no detail is provided as to what mechanism would be used to address cross-boundary issues of strategic importance.

Currently in Oxfordshire, very effective cross-boundary partnership arrangements are in place in the form of the Oxfordshire Growth Board (OGB). This has resulted in effective progress in plan-making and infrastructure provision including the aware of funding through the Oxfordshire Housing and Growth Deal and the Housing and Infrastructure Fund (HIF).

If the duty to co-operate is to be removed, it needs to be replaced with an expectation that mechanisms such as the Oxfordshire Growth Board to facilitate effective cross-boundary working between local authorities and other key partners must be put into place. This should be reflected in the proposed reforms as they are taken forward.

In the absence of this detail it is impossible to provide definitive support, but in principle, the Council would welcome some form of simplification of the examination process.

The Council agrees with the White Paper proposal to ensure that all plans are informed by appropriate infrastructure planning. This is vital and should be built in as a mandatory requirement of all plan-making.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The existing Statement of Common Ground process/requirement identified in the NPPF is one mechanism. However, consideration should also be given to the use of inter-authority partnerships such as the Oxfordshire Growth Board which has successfully enabled plan-making in Oxfordshire in recent years as well as securing significant investment in new infrastructure and affordable housing.

Consideration should be given as to whether such arrangements should be put into place across the Country to ensure that strategic cross-boundary issues are effectively addressed.

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

In principle, the concept of a standardised approach to housing need is sensible in providing greater certainty and reducing unnecessary and lengthy debate. The District Council has responded separately to the Changes to the Planning System consultation raising concerns about the methodology underpinning the standard method including the limitations of

household projections and the removal of the current cap for upward adjustments in respect of market signals/housing affordability. Those concerns are not repeated here.

Should the proposed standard method be taken forward, it is essential that it is seen as a starting point for assessing housing need only and that in setting a housing requirement, appropriate consideration is given to both relevant constraints (e.g. AONB and Green Belt) and opportunities (e.g. growth / strategic infrastructure aspirations).

The White Paper is however silent on how those factors might be taken into account in setting a housing requirement and as such, it is not possible to comment in detail.

If the standard method for assessing housing need is taken forward, it is essential that a robust process for translating the basic level of housing need into a specific housing requirement is put into place. The Government should publish details of what that process would be and how it would apply in plan-making terms as soon as possible.

The proposal to remove the five-year housing land supply requirement whilst retaining the Housing Delivery Test and the presumption in favour of sustainable development is supported. Clarity is needed however in respect of the circumstances in which the 'tilted balance' set out in Paragraph 11 of the NPPF would be engaged in the absence of a requirement to demonstrate a 5-year housing land supply.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

Whilst housing affordability is clearly a key consideration, in reality there is little evidence to suggest that increasing housing supply in any way suppresses existing market sales values or rents and improves affordability. As such, it is essential that any adjustment for affordability is a sensible one that does not result in unrealistically high indication of need that even if it were able to be achieved, would in reality do little to bring down the market value of new housing. This is particularly relevant given that the Government's separate consultation on changes to the planning system proposes to remove the cap which currently limits the level of increase for individual authorities.

In terms of the extent of existing urban areas, using this as an indicator of how many houses are actually needed / required in an area is a huge over-simplification. It does not, for example, take account of latent demand or 'hidden households' where several generations of a family may be living under one roof due to the lack of availability of affordable housing.

If the extent of existing urban areas is to become an indicator, it should also factor in how much growth has already occurred in the past 10 years. Significant past over- delivery should not result in a disproportionately higher future housing need. It is the equivalent of penalising an authority for its success.

Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

The District Council has a number of significant concerns about the proposals to automatically grant outline planning permission for substantial development within identified growth areas and to enable automatic approvals for other forms of development.

Whilst the current process of allocating land for development through local plans already establishes the principle of development, this is very different to an outline planning application which, for large sites, will often be supported by extensive evidence and detailed

masterplanning looking at key issues such as phasing of development and the provision of supporting infrastructure.

Whilst the desire to speed up and streamline the process is understood, it is unclear how much evidence and supporting technical detail a local authority would need to have in place to effectively grant outline planning permission through its Local Plan.

Elsewhere, the White Paper describes a simplification of the examination process for Local Plans with existing tests of soundness replaced with something less onerous and requirements for SA/SEA also replaced with something more simplistic.

It is difficult to see how local plans can be expected to take on the role of granting outline planning permission for large, strategic sites whilst the process for examining those plans is to be much simplified. There seems to be a direct conflict between the idea of local plans granting outline planning permission for identified growth areas and the relaxation of evidence needed to support local plans.

If the plan-making stage is effectively to be used to circumvent the need for outline planning permission in major growth areas, surely it would need to be supported by more rather than less evidence which raises obvious resource implications.

In terms of a streamlined, faster route for detailed consent, the White Paper provides little detail other than the fact that the focus will be on good design and site-specific technical details with permission to be achieved in one of three ways.

Clearly once the principle of development has been established it is in everyone's interest to facilitate rapid decision-making on the details to ensure timely delivery. However, it is vital that this is not at the expense of quality and consistency of decision-making and key issues potentially being overlooked.

If the proposals are to be taken forward, further clarity should be provided at the earliest opportunity as to what the more rapid detailed consent route would entail.

In respect of 'renewal' areas identified as suitable for development, the Council has significant concerns about the prospect of automatic approvals for certain forms of development which appear to be predominantly a design-based decision using pattern-book developments of popular and replicable designs.

Whilst the basic, central tenets of good design including building types, heights, set-backs etc. are clearly transferrable, to expect whole 'pattern book' developments to be imported into proposed renewal areas, surely runs the risk of standardised 'anywhere' development that does not fit in with or take account of the local context and setting.

The Government has already significantly extended permitted development rights in recent years leading to questionable development including some office to residential conversions. To further extend these rights so that potentially large-scale developments can be fast-tracked with little scrutiny and local input from democratically elected Members is not appropriate or supported.

The White Paper makes reference to such proposals enabling an 'industrialisation of housebuilding' which is extremely worrying for a predominantly rural area such as West Oxfordshire.

In summary, the Council has a number of significant concerns about this proposal. Whilst the desire to speed up decision making is acknowledged, there will be greatly increased pressure on local authorities to produce sufficient evidence to justify the granting of outline planning permission upon adoption of their Local Plan.

This seems to run counter to the proposals set out elsewhere in the White Paper regarding the simplification of the local plan examination process and will be further compounded by a more rapid detailed consent route. It appears that too many corners are potentially being cut without the opportunity for proper public engagement and scrutiny, in particular the proposals to fast-track certain forms of development within identified renewable areas and grant outline planning permission for growth areas upon adoption of a local plan.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

The approach proposed for protected areas (i.e. to maintain the current requirement for development proposals to be supported by a planning application) is supported. As per the Council's response to Proposal 2, any decision should be informed not only by policies set out in the NPPF but also by appropriately derived policies which are specific to the local area and do not repeat the content of national policy.

For areas of renewal, the general presumption in favour of development is logical and the intention to speed-up decision making is acknowledged and understood. However, as outlined above, the Council has significant concerns about the concept of fast-tracking certain forms of development through extended permitted development rights as well as the concept of a faster planning application process for other forms of development.

It is also unclear which pre-specified forms of development would benefit from the new permission route to automatic consent and how the new 'faster' planning application process for other types of development would operate in practice – is it simply going to put the local authority under pressure to determine such applications in a shorter timeframe?

In short, the Council has significant concerns that proposals for development within renewal areas will effectively be waived through without due consideration and input from democratically elected members.

Whilst the Council supports the proposal to enshrine a presumption in favour of development in legislation, this should not then lead to proposals being able to short-circuit the decision-making process because they fit into a certain category or fulfil a certain design criterion.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

The White Paper suggests that for exceptionally large sites such as a new town, the Government wishes to explore whether a Development Consent Order under the Nationally Significant Infrastructure Projects regime could be an appropriate route to secure consent.

Without further detail, it is difficult to comment on the merit of such an approach but the Council agrees that it is worth exploring further. If any sort of arrangements were to be taken forward, it would be absolutely essential to ensure that appropriate opportunities for early and extensive community engagement are built into the process.

Furthermore, the speed of decision-making should not be at the expense of quality in terms of place-making and creating the types of new places where people can lead healthy and fulfilled lives.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

10. Do you agree with our proposals to make decision-making faster and more certain?

The Council is supportive of the principle of greater certainty of decision-making and ensuring that deadlines are able to be met. However, this should not be at the expense of the quality of development proposals or run the risk of important issues such as flood risk for example, being overlooked.

The proposals to introduce greater digitisation of the application process are supported in principle however it will be essential for local authorities to be given appropriate time and resources to bring in such arrangements.

The Council is concerned about the suggestions regarding supporting information being stripped back to the bare minimum with major developments supported by no more than relevant drawings and a single standardised planning statement. How can a planning application for say 100 new homes be determined even in outline form, in the absence of appropriate supporting technical information? Whilst there is clearly scope to trim down some of the requirements, the proposals appear to be going too far in the interest of speed and brevity.

The planning system inevitably involves a strong degree of professional judgement and expertise as well as the oversight of democratically elected members. To suggest that this is some sort of burden which slows down decision-making and should therefore be stripped right back to enable binary 'yes/no' choices is entirely inappropriate.

The Council strongly objects to the proposals to penalise local authorities for failing to determine planning applications within agreed timescales. Planning fees should not be refunded and deemed consent should not be granted for any form of development. Inevitably, circumstances will arise which cause delay and these are often well beyond the control of the local authority. To penalise them financially or simply wave through certain applications because there has been a delay is entirely inappropriate.

If the proposal to penalise local authorities were to be taken forward, it should be on the basis of significant delay only and where the responsibility for that delay demonstrably rests with the local authority.

The Council has further significant concerns regarding the proposal to refund planning fees in the event of successful planning appeals. There is no evidence to suggest that this will improve decision-making by planning committees but it does create a risk that planning committees will be minded to approve most applications to avoid the possibility of a financial penalty further down the line or alternatively that many more applicants will choose to appeal on the basis that they might recoup some of their costs, thus clogging up the system.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

11. Do you agree with our proposals for accessible, web-based Local Plans?

The District Council acknowledges that Local Plans should be more visual, map-based and engaging for the reader in a range of different formats including digital platforms. There is also often an opportunity to much reduce the length of plans and make them more succinct and focused.

In this respect, the proposals to make plans more visual, map based and 'digital' are supported.

However, the Council has concerns that the proposals go too far in seeking to standardise all local plans into exactly the same format with a primary focus on data and much less explanation in terms of rationale and justification.

As outlined in response to Proposal 1, local plans provide the opportunity to articulate important local priorities and aspirations and there is a real danger in stripping them back to machine-readable data driven, standardised 'tools' that those local priorities and aspirations will not be able to be addressed.

Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

Officers agree that a more rapid and streamlined approach is achievable and that combining the publication and submission of a local plan as proposed is sensible.

However, to expect a local authority to complete a local plan in 30 months is likely to prove extremely challenging particularly given that in doing so the authority will be expected to produce sufficient evidence to justify the granting of outline planning permission in identified growth areas upon adoption of the plan.

If local plans are to grant outline planning permission, they will need to be supported by appropriate technical evidence and underpinned by effective community engagement, all of which takes time to put into place.

There will also be additional time and resource implications associated with the increased emphasis which is being placed on design code work and masterplanning. This all needs to be recognised and worked through in the form of a practical example for a typical local authority before a specific time-limit for plan-making is imposed. It must also be recognised that often, the reasons for delays with the current system of plan-making are beyond the control of the local authority and as such, should the 30 month timescale be introduced, any sanction for then failing to achieve it, must be reasonable and considered.

As ever, there is a concern that speed should not become the driving factor and that quality of plan-making and consequent decision-taking should be the most important considerations.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

The principle of Neighbourhood Planning is supported as an important way of identifying and articulating local issues and priorities. There is clearly scope to improve such plans and make them more accessible and useful through improved digital tools and use of data.

The basic content of Neighbourhood Plans will however need to be carefully thought through as in many instances, they tend to repeat local or national policy. The real value of neighbourhood planning is in developing locally specific policies which are distinct to the area and designed to realise local aims and objectives.

Achieving that is not however simple and if the proposals to slim down and streamline local plans are taken forward, this will clearly have a knock-on effect on the scope and content of neighbourhood plans.

At the very least, the Government will need to provide guidance and detail on what form neighbourhood plans will be expected to take and the type of policy they will be expected to include.

The Council does not support the concept of 'street-level' neighbourhood plans as suggested in the White Paper, due to the potentially excessive resource burden placed on local authorities and the danger of creating social division through a 'them and us' attitude.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

Some sort of standard template for neighbourhood plans is likely to be beneficial in facilitating greater use of digital technology. It could also help to speed up the plan making process. Such a standard approach could potentially include specific advice/guidance on the issue of design – albeit, it would need to be tailored to local circumstances accordingly.

The Government should seek to develop two or three model neighbourhood plan templates and subject those to a number of ‘practice runs’ with a range of local communities to help inform the most appropriate way forward.

Proposal 10: A stronger emphasis on build out through planning

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

The concept of accelerating development e.g. through the use of different development types and builders is supported. The Council has included such a policy in the recently published Salt Cross Garden Village Area Action Plan (AAP).

Embedding such a requirement within the NPPF and associated practice guidance would appear to be a good starting point.

It should also be included as a pre-requisite for any outline planning permission or automatic approval granted for larger developments upon adoption of any new style local plan.

Pillar Two - Planning for beautiful and sustainable places

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

The Council is supportive of the National Design Guide and welcomes the commitment in the White Paper to publishing a National Model Design Code to supplement the guide as well as a revised and consolidated Manual for Streets.

As these will be set at a national level, it is essential that they are supported by local design guides and codes prepared with extensive and meaningful community input. The proposal to formalise the requirement for local engagement is supported as is the proposed emphasis on ensuring that design guide and codes are binding on decisions about development.

This will be particularly important if the White Paper proposals to streamline local plan making through a zonal approach to growth is taken forward and development management policies are deferred to the NPPF.

However, the White Paper vastly underplays the additional resource requirements associated with this shift in emphasis. Design codes and guides are not quick or easy to produce and yet the White Paper infers that with a little re-training, those whose current role within the planning system may change can suddenly become urban design and masterplanning experts. In reality it will not be that simple and local authorities are likely to find themselves deluged with requests from local authorities to engage with them on design-based matters and unable to offer adequate support and guidance.

Furthermore, whilst good quality design is vitally important, it is just one component of sustainable development and should be seen as ‘trumping’ all other considerations of good planning.

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

Yes – this would seem a sensible proposition and it would make sense to make use of an existing organisation rather than create one. The Council does not accept that each local authority should necessarily be required to have in place a chief officer for design and place-making although this would clearly be advantageous.

Given the increased emphasis on design codes and guidance and the majority of authorities would presumably look to bring in or develop the necessary expertise.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

The Council has no firm view on this but on the face of it, it would seem sensible to ensure that Homes England factor in the importance of high quality design and place-making alongside their other strategic objectives.

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

20. Do you agree with our proposals for implementing a fast-track for beauty?

New developments should already be underpinned by high quality standards of design. This is not a new concept and has been embedded in national and local policies for many years. To suggest that suddenly, an advantage will be awarded to high quality designs in terms of the time taken to achieve consent does not seem appropriate or necessary. It also runs the risk of other important issues being overlooked in favour of just one aspect.

Whilst clearly well-designed schemes should be looked upon favourably, is it right that they should obtain a swifter route to securing consent or should high quality design be considered alongside all other key issues as is currently the case? Whilst good quality design is vitally important, it is just one component of sustainable development and should be seen as 'trumping' all other considerations of good planning.

In terms of the specific proposals set out in the White Paper, these state that the NPPF will be updated to make clear that schemes which comply with design codes and guides have a positive advantage and greater certainty about their prospects of a swift approval.

Whilst the Council does not have specific concerns about this, it is unclear what this positive advantage will actually entail and how a judgement will be made. Design is by its very nature rather subjective and an applicant may well consider their proposal to be in full accordance with a local design code or guide whilst the local authority concludes otherwise. In such cases what will the positive advantage be (presumably a swifter decision?) and how will that judgement be made?

The second proposal requires identified Local Plan growth areas to be supported by a masterplan and site-specific code which should be in place before detailed proposals come forward. The White Paper suggests that these masterplans and codes could be prepared by the

local planning authority alongside or subsequent to preparing its plan but does not recognise the significant resource burden that this would place on local authorities even in preparing a relatively high-level set of documents. This raises significant concerns.

The third proposal is to broaden permitted development to allow replicable pattern book development to be taken forward and approved quickly with pre-approval of popular and replicable designs through permitted development leading to an industrialisation of housebuilding.

This raises significant concerns. Whilst the basic, central tenets of good design including building types, heights, set-backs etc. are clearly transferrable, to expect whole 'pattern book' developments to be imported into proposed renewal areas, surely runs the risk of standardised 'anywhere' development that does not fit in with or take account of the local context and setting.

The Government has already significantly extended permitted development rights in recent years leading to questionable development including some office to residential conversions. To further extend these rights so that potentially large-scale developments can be fast-tracked with little scrutiny and local input from democratically elected Members is not appropriate or supported.

Reference to an 'industrialisation' of housebuilding is extremely worrying for a predominantly rural area such as West Oxfordshire.

Notwithstanding the Council's in-principle concerns, if the proposals are to be taken forward, it will be essential as indicated in the White Paper, to allow local planning authorities and neighbourhood planning groups to use local orders to modify how the standard types would apply in their areas.

Clearly the proposals are potentially significant and again, notwithstanding the Council's in principle concerns, the proposed use of a number of pilot projects before being rolled out more widely is supported.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

The principle of amending and updating the NPPF to ensure a stronger focus on climate change and maximising environmental benefits is supported. However, very little detail is provided as to what this will actually entail and as such it is difficult to comment meaningfully at this stage.

There are some suggestions that an updated NPPF will address issues such as nature recovery, better green spaces and tree cover which are of course all laudable objectives but until further detail is known, informed comment is not possible.

The White Paper suggests that further consultation on changes to the NPPF will be carried out in the autumn and the Council will respond accordingly at that time. In the interim, the Council supports in principle the intention to strengthen the NPPF from an environmental perspective.

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

The Council supports the concept of simplifying the assessment of environmental impacts for both plan-making and decision-taking. No detail is provided in the White Paper but the aims of reform are listed as speeding up decision-making, easier to understand information and requirements and the need to take advantage of any opportunities for environmental improvements.

The Council notes that there will be a separate consultation on this in the autumn but is supportive in principle of a more accessible, transparent and streamlined process of assessment.

Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century

The proposals here are light in detail and appear to revolve around greater flexibility to enable changes to be made to listed buildings and conservation areas to support their continued use and address climate change as well as more rapid ways of achieving consent for routine works.

Whilst not stated in the White Paper, presumably any such changes will be the subject of further consultation in due course. The following initial concerns are however raised.

The White Paper suggests that ‘Local Plans will clearly identify the location of internationally, nationally and locally designated heritage assets, such as World Heritage Sites and conservation areas, as well locally important features such as protected views’.

Unknown or unidentified heritage assets could however be missed including structures that have not yet been identified to be listed or non-designated heritage assets and buildings that do not merit listing but do display enough historical, architectural, social or aesthetic appearance etc. to merit them being locally listed. It also includes below ground archaeology and many archaeological sites which cannot be included because they have yet to be discovered.

There are also clear resource implications associated with updating local plans to ensure such assets are properly recorded including mapping, particularly in respect of previously unknown sites / buildings that have potential to be heritage assets but that have not yet been assessed and mapped by the local authority.

In terms of the proposals to ‘fast-track’ routine works, every building is different with its own unique set of characteristics. The general public will not necessarily understand what constitutes routine works, and how this should be conducted, and whether the materials they use are compatible with historic buildings, or whether it will affect a building’s significance or character – this lack of knowledge can have a harmful impact on the character and fabric of listed buildings. For example, general repointing using concrete instead of a lime mortar can be very damaging to a historic building.

Routine works can be difficult to measure and would still require an expert to determine whether the works constitute ‘routine’. Most responsible listed building owners in West Oxfordshire generally seek advice from the Conservation Team undertaking works, and this still appears to be the most appropriate way forward.

All historic buildings are important (including non-designated), so we should be highly cautious to allow anyone with a vested interest (or conflicted interest) in any proposal to have earned autonomy from routine listed building consents. Only conservation / archaeological officers employed by the LA with neutral interest should assess the suitability of a proposal for works to a listed building. Instead there should be more emphasis on the production of a heritage statement by a qualified heritage specialist (Para 189, NPPF) – because once the full significance and character of a building is understood, then any future decisions can be guided by that assessment, and the decision making process should be quicker.

In terms of adaptations to address climate change, we must ensure that the way that historic buildings are adapted / retrofitted is compatible with their character, materials and use – and that the guidelines for adaption / retrofit adhere to the research and guidance from experts such as Historic England and SPAB etc. Any proposals for adaption or retrofitting should still be assessed by the LA’s conservation team to ensure that it is appropriate and will not have a harmful impact on a building’s character or historic fabric.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

The commitment set out in the White Paper is welcome and supported in principle as it is essential we achieve a step change in the environmental and energy efficiency performance of our buildings. This is reflected in ambitious proposals put forward by the District Council in respect of the recently published Salt Cross Garden Village Area Action Plan (AAP).

Little detail is provided however as to what this means in practice and it is suggested that such proposals will be taken forward as part of the Future Homes Standard with further consultation in the autumn.

The District Council will respond accordingly at that time.

Pillar Three - Planning for infrastructure and connected places

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

Although there is scope to improve the current system of developer contributions, to effectively scrap it and replace it with a new, nationally set tariff in the form of an 'Infrastructure Levy' is not supported.

Instead, the focus should be on finding ways to improve the current system of developer contributions including Section 106 agreements to make the process quicker and more transparent with less duplication.

The White Paper suggests that a nationally set charge would aim to increase revenue levels nationally when compared to the current system, however no evidence is provided to this effect. At the very least, a worked example should be provided to demonstrate the likely contribution from a housing led scheme of say 100 new homes to enable a meaningful comparison to be undertaken with the sort of obligations/payments secured through the current developer contributions system.

If part of the problem with CIL is a lack of take-up by local authorities and the inconsistency this creates, the Government should make CIL mandatory rather than optional. It should also provide greater clarity in respect of the relationship between CIL and S106 as the recent changes to the CIL regulations have served to blur the lines between the two with contributions via both mechanisms now able to be spent on the same item of infrastructure.

If the single infrastructure levy proposals are taken forward, the Council would be supportive of the principle of local authorities being able to borrow against revenues to forward fund infrastructure.

Whichever approach is taken, it is essential that any uplift in land value is properly captured. The increase in value over and above existing agricultural land value for undeveloped greenfield sites in particular is huge and it is only right that a good proportion of that uplift is captured and available to support the provision of necessary supporting infrastructure.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

Whichever approach is taken, it is essential that any uplift in land value is properly captured. The increase in value over and above existing agricultural land value for undeveloped greenfield sites in particular is huge and it is only right that a good proportion of that uplift is captured and available to support the provision of necessary supporting infrastructure.

As land values vary significantly across the country, if a new levy is introduced, this would need to be supported by multiple area-specific rates, preferably set locally but within a set of agreed overall national guidelines/parameters.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

It is essential that any uplift in land value is properly captured. The increase in value over and above existing agricultural land value for undeveloped greenfield sites in particular is huge and it is only right that a good proportion of that uplift is captured and available to support the provision of necessary supporting infrastructure.

At present, the Council would suggest that very little of this uplift is clawed back for the provision of infrastructure and this position clearly needs to change.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

If the proposals are taken forward, the Council would be supportive of the principle of local authorities being able to borrow against revenues to forward fund infrastructure.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

The Council strongly agrees that if a reformed levy is taken forward, both changes of use which require planning permission and those which are permitted development such as office to residential conversions should be required to make a contribution towards infrastructure.

Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

Whichever mechanism is used to secure affordable housing it is essential that the amount of new affordable housing provided is at least as much as currently happens and preferably, more given the acute need for affordable housing in many areas.

The priority should be for on-site provision and it is vital that financial contributions made through the proposed infrastructure levy are not seen as a convenient way of avoiding having to provide new affordable homes on-site.

The Government's viability practice guidance makes it clear that policy requirements such as affordable housing provision should be reflected in the price that is paid for land. As such, the on-site provision of affordable housing should be made mandatory as there will be very few instances where viability is a genuine concern provided a reasonable price is paid for the land.

It is important that this proposal is seen in the context of the Government's separate consultation on changes to the planning system which proposes to raise the threshold for

affordable housing provision to 40 or 50 units. The Council objects to that proposal even on a temporary basis as it will clearly reduce the amount of new affordable homes coming forward.

This does not reflect the above proposal which seeks to ensure affordable housing provision is not diminished. More joined-up thinking is clearly required on this topic.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

In-kind delivery through the infrastructure levy would be preferable as it would reduce the administrative burden placed on the local authority and would simply be offset against the total amount of levy payable.

The two are not however mutually exclusive and it should be possible for local authorities to also purchase additional affordable units, using infrastructure levy funds if they wish to.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

The White Paper suggests that such a risk can be fully addressed through policy design and this should clearly be done if the levy is to be introduced. There should be no additional risk or burden placed on local authorities as a result of any change.

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

The 'in-kind' proposals essentially revolve around registered providers purchasing market homes at a discounted rate with any discount offset against the total amount of levy payable. The quality of new affordable homes should therefore be no different from the market units. There is also a generally accepted view that housing schemes should be 'tenure blind'.

Elsewhere the White Paper refers to the National Design Guide and the preparation of a new National Model Design Code. These and the roll out of more local design codes and guides clearly provide the opportunity to reinforce the importance of delivering high quality affordable homes.

Otherwise, no additional steps would appear to be necessary.

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

Any system of developer contribution should focus on the provision of affordable housing and the range of new and enhanced infrastructure that is needed to support new development.

Providing local authorities with more flexibility including the opportunity to spend levy receipts on improved services or reducing Council Tax, there is surely a danger that these key priorities may be side-lined.

It also raises obvious questions about why developers should pay into a general fund that is not used to fund the related improvements that are needed to support their proposals.

As such, the Council considers that the permitted uses of any levy should remain focused on infrastructure and affordable housing.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

N/a – the Council does not consider that local authorities should be given greater flexibility. The permitted uses of any levy should remain focused on infrastructure and affordable housing.

Delivering Change

Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms.

The intention to prepare a resources and skills strategy is noted and welcomed. The White Paper proposals raise a number of significant considerations in terms of available skills and resources, particularly within local Government and it is vital that they are supported by appropriate investment.

The concept of a new performance framework for local authorities is supported in principle but further detail is needed before an informed response can be made, particularly as it is intended to cover all planning functions.

Concern is raised regarding the reference made to PINS and statutory consultees becoming more self-financing through new charging mechanisms. This will inevitably mean that such costs are passed onto the local authorities that use their services.

Proposal 24: We will seek to strengthen enforcement powers and sanctions

The general principle of introducing stronger enforcement powers and sanctions is supported. Presumably this will be the subject of further, separate consultation in due course and the Council will seek to respond accordingly at that time.



WEST OXFORDSHIRE
DISTRICT COUNCIL

WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 11
Subject	Consultation on Changes to the Current Planning System
Wards affected	ALL
Accountable member	Councillor Jeff Haine, Cabinet Member for Strategic Planning Email: jeff.haine@westoxon.gov.uk
Accountable officer	Chris Hargraves, Planning Policy Manager Tel: 01993 861686; Email: Chris.Hargraves@publicagroup.uk
Summary/Purpose	To agree a response to the Government's consultation on changes to the current planning system.
Annex	Annex A – Proposed WODC response to the consultation
Recommendation	That the report be noted, and the proposed response to the consultation included at Annex A be approved.
Corporate priorities	
Key Decision	No
Exempt	No
Consultees/ Consultation	Internal consultation with various Officers at West Oxfordshire District Council and also at Cotswold District and the Forest of Dean.

I. BACKGROUND

- 1.1. The Government has recently published a consultation paper on proposed changes to the current planning system.
- 1.2. It focuses on four main topics; the standard method for assessing housing need, delivering first homes (the Government's latest form of affordable home ownership), raising the small sites threshold for affordable housing provision and extending the current system of 'permission in principle' to larger developments.
- 1.3. The consultation paper is the subject of an 8 week public consultation which closes on 1 October 2020 and complements a number of proposals set out in the Government's White Paper: Planning for the Future, which is the subject of a separate consultation.
- 1.4. This report provides a brief overview of the consultation proposals together with an Officer response. Attached at [Annex A](#) is the proposed WODC response to the consultation structured around the proposals and specific consultation questions contained therein.
- 1.5. Members are asked to agree [Annex A](#) as the Council's formal response to the consultation.

2. CHANGES TO THE CURRENT PLANNING SYSTEM: A SUMMARY OVERVIEW

- 2.1. The consultation covers four main topics. These are summarised below together with the overall view of Officers. The summary should be read in conjunction with the suggested consultation response attached at [Annex A](#).

The Standard Method for Assessing Housing Need

- 2.2. Through the revised NPPF published in 2018, the Government introduced a new 'standard method' for assessing housing need, with the aim of having a common approach in place amongst local authorities to reduce the amount of debate at examination and speed up plan-making. It was not of relevance to the West Oxfordshire Local Plan because that was submitted for examination in 2016.
- 2.3. The purpose of the standard method is to identify the minimum number of homes to be planned for. In other words, it represents a starting point and in some instances, there will be local circumstances which will warrant it being exceeded (e.g. particular growth / infrastructure aspirations).
- 2.4. The standard method was updated in February 2019 and is now proposed to be further altered to help ensure delivery of the Government's target of 300,000 new homes per year. It is very clear that the Government does not want land supply to be a limiter to this ambition.
- 2.5. Under the current method, there are three steps; Step 1 sets a baseline using a 10-year average of the Government's official 2014-based household projections; Step 2 makes an upward adjustment based on housing affordability (using median house price-to-earnings ratio) and Step 3 imposes a cap which limits the increases an individual local authority can face (no more than 40% above the average annual housing requirement set out in existing policies).
- 2.6. In West Oxfordshire, this current method results in a basic housing need figure of 563 homes per year.
- 2.7. Under the new approach, at Step 1, 2018-based household projections are used to derive a 10-year average annual household growth, which is considered alongside 0.5%

of the existing dwelling stock in the local authority area. The baseline figure is taken as whichever is the higher of the two.

- 2.8. At Step 2, the new approach puts a greater weight on market signals including two adjustments for affordability including the median house price-to-earnings ratio (similar to how it is calculated now, but allowing for more downward and upward adjustments) plus consideration of how affordability in the local area has changed over the previous 10 years.
- 2.9. Importantly, unlike the current method, the new approach does not include any sort of cap to limit the level of increase for individual authorities.
- 2.10. The new method results in a national housing need of 337,000 homes per year. The figures for Oxfordshire are shown per annum in the table below, with West Oxfordshire's figure representing a relatively modest increase from 563 homes per year under the current standard method to 653 per year using the new approach.
- 2.11. Coincidentally, this is very similar the figure of 660 per year identified for West Oxfordshire in the Oxfordshire SHMA (2014).

	Cherwell	Oxford	South Oxon	Vale	West Oxon	Oxon
Proposed Standard Method	1305	656	723	1447	653	4784

- 2.12. In terms of transitional arrangements, those authorities that have new local plans in progress and have formally published their plans or are close to doing so will be given either 6 or 9 months to formally submit them for examination from the date the new method is introduced.

Officer Response

- 2.13. Because of when the West Oxfordshire Local Plan was submitted in 2016, the standard method for establishing housing need has not been a significant consideration in West Oxfordshire to date.
- 2.14. It is evident from the West Oxfordshire Local Plan and other Local Plan examinations that considerable time is often spent developing and debating different assessments of housing need which can lead to expense and delay in plan-making. As such, the principle of establishing a 'standard' method which all authorities can work to is on the face of it, a sensible proposition.
- 2.15. The original standard method published in 2018 and refined in 2019 clearly has limitations and unfortunately, these have not been remedied in the latest proposals.
- 2.16. The starting point under both the current and proposed approach is the Government's official household projections. Whilst these give an indication of future household growth, they are trend-based and simply 'roll forward' what has happened in the past.
- 2.17. As such, they have distinct limitations. This is particularly the case for the 2018-based projections which factor in only two years' worth of migration data, increasing the risk of the projections being 'skewed' by short-term trends.
- 2.18. The proposed approach suggests that alongside the household projection, the existing dwelling stock of the local area should be considered. However, other than the fact it is stable and a known quantity, the consultation fails to explain why the dwelling stock is

taken into account. As such, it gives the impression that it has simply been included to inflate the baseline figure to whichever is the higher of the two.

- 2.19. Under the proposed approach, two adjustments are then made to factor in 'affordability' or rather the lack of. Whilst this is clearly a key consideration, in reality there is little evidence to suggest that increasing housing supply in any way suppresses existing market sales values or rents and improves affordability. As such, it is essential that any adjustment for affordability is a sensible one that does not result in unrealistically high indication of need that even if it were able to be achieved, would in reality do little to bring down the market value of new housing.
- 2.20. This is particularly relevant given that the consultation proposes to remove the cap which currently limits the level of increase for individual authorities. In the absence of any sort of cap, for Cotswold District, the proposed standard method results in an extremely high figure of 1,209 new homes per year, well beyond both the recent 10-year average delivery of 543 homes per year and the current Local Plan requirement of 420 homes per year.
- 2.21. Whilst this consultation paper and the associated White Paper, make it clear that the new standard method for housing need is a starting point only and that other considerations such as constraints presented by AONB and Green Belt can be factored in to determine a 'housing requirement,' at present there is little detail on how this will be achieved.
- 2.22. Around 1/3 of West Oxfordshire falls within the Cotswolds Area of Outstanding Natural Beauty, but does this mean 1/3 can be trimmed off the housing need figure of 563 homes per year? Almost certainly not, but at present there is no information available as to how those broader considerations will be taken into account in translating the basic housing need figure into a specific requirement.
- 2.23. In summary, the principle of a common approach to establishing housing need is sensible and should, in theory save time and money at examination helping to speed up plan-making.
- 2.24. However, there are known limitations with using trend-based household projections, particularly when short-term migration trends are used, and the relationship between housing delivery and affordability is complex, meaning that whilst an adjustment for housing affordability clearly needs to be factored in, this should not be at the expense of ridiculously high (and undeliverable) levels of housing need, particularly when exacerbated by removing the cap which is used in the current method.

Delivering First Homes

- 2.25. The Government initially consulted on its First Homes proposals in February 2020. First Homes are intended to support those who wish to purchase a home in their local area but are unable to afford a property on the open market. They will have a discount of at least 30% from the market value, with any discount then carried forward in perpetuity through restrictive covenants. The intention is that First Homes are prioritised for local people, first-time buyers and key workers.
- 2.26. The current consultation explains that the Government intends to set out in policy that a minimum of 25% of affordable housing units secured through developer contributions should be First Homes – this will be a national threshold set out in planning policy. Generally this will be secured through on-site provision but where a financial contribution is secured, at least 25% of this should be used to secure First Homes (e.g. by acquiring additional First Homes from market development).

- 2.27. Because local authorities will already have policies in place setting out the amount and type of affordable housing expected from development, under the new system any planning application should seek to capture the same amount of value as would be captured under the current policy - albeit with a different type of affordable product.
- 2.28. Provided the minimum 25% of First Homes is provided, for any remaining requirement, the developer would then either follow the general mix identified in the Local Plan (adjusted as appropriate for the First Home element) or simply negotiate with the local authority to agree an appropriate mix. The Government's preference is for the first option.
- 2.29. In terms of transitional arrangements, local plans and neighbourhood plans that are submitted within 6 months of the new policy being enacted will not need to reflect the First Homes policy requirements.
- 2.30. In terms of the level of market discount offered, local authorities will have discretion to increase this from 30% to 40% or 50% subject to appropriate evidence. Where discounts of more than 30% are applied, the proportion of units (at least 25%) will remain in place.
- 2.31. In line with other affordable tenures, First Homes will be exempt from having to pay CIL.
- 2.32. Rural exception sites will continue to be used in designated rural areas (AONB etc.) but elsewhere, a new First Homes exception sites policy will be introduced to support small sites brought forward outside the Local Plan to deliver affordable homes. There will also be some flexibility in the policy to allow a small proportion of other affordable tenures and market homes to support viability.

Officer Response

- 2.33. The concept of First Homes as an additional form of affordable home ownership is supported in principle, however the proposals raise a number of concerns, in particular the prescription of a top-down specific percentage of First Homes (minimum 25%) that must be delivered as a proportion of all affordable housing units.
- 2.34. Whilst First Homes clearly have the potential to play an important role in supporting first-time buyers and others wishing to step onto the housing ladder, it is essential that this is not achieved at the expense of other forms of affordable housing which have an equally important role to play but are less favoured by developers because of the lower return – social rented housing being a case in point.
- 2.35. As an example, recent housing needs evidence prepared in support of the Salt Cross Garden Village Area Action Plan (AAP) suggests a need for a 60/40 split between rented affordable products and affordable home ownership, subject to viability.
- 2.36. Clearly the imposition of a set, national policy requiring 25% of all affordable homes to be First Homes, could artificially skew delivery towards affordable home ownership and away from rented need which may well be more critical.
- 2.37. In terms of the proposed First Homes exception sites policy, the principle of this is supported, however concerns are raised at the possibility of allowing a proportion of market homes to assist viability This should not be necessary because as a 'policy requirement,' any 'subsidy' needed to deliver the First Homes should come out of the land value, in line with the Government's viability practice guidance.
- 2.38. The consultation proposes that no site-size threshold for First Homes exception sites is provided and that instead there will be a more general requirement for such sites to be proportionate in size to the existing settlement. This is very general and either an indicative threshold should be provided or at the very least an indication of what

proportionate is likely to look like e.g. no more than 5-10% of the size of the existing settlement.

- 2.39. The consultation makes it clear that within designated rural areas such as the AONB, delivery of new affordable homes will continue to be through Rural Exception Sites and this approach is supported.
- 2.40. In summary, the principle of First Homes as a new form of affordable home ownership is supported, however it must be seen as one of a number of different affordable products and not imposed in a top-down, disproportionate and prescriptive manner, which will inevitably lead to other affordable products being sidelined particularly where they hold less 'value' in viability terms. In some instances, this is likely to run counter to recent evidence of 'on the ground' housing need.
- 2.41. Concerns are also raised about the possibility of allowing market housing on First Home exception sites. Simply put, this should not be necessary with any loss in 'value' being absorbed by the landowner. The suggested removal of any sort of site size threshold for such exception sites also raises concerns on the basis that it lacks clarity and is likely to lead to large-scale proposals coming forward in inappropriate locations simply on the basis that they are providing First Homes.

Supporting small and medium-sized developers (SMEs)

- 2.42. To support SMEs in the medium-term post Covid-19, the Government is proposing to temporarily increase the small-site threshold at which affordable housing can be sought. At present, in West Oxfordshire, under Policy H3 of the Local Plan, other than within the AONB only larger housing schemes of 11 or more units will be required to provide affordable housing on-site. Within the AONB, a financial contribution from smaller schemes of 6-10 units will be sought.
- 2.43. Under the Government's current proposals, the threshold for affordable housing contributions would be raised to either 40 or 50 units for an initial period of 18 months. It is argued that whilst there would be a small reduction in affordable housing delivery, on balance, the proposed approach would allow more sites to come forward and help to minimise economic pressure on smaller enterprises.
- 2.44. In designated rural areas (AONB etc.) the current threshold would remain the same.

Officer Response

- 2.45. Officers have strong concerns about this proposal even if applied on a temporary basis. A large proportion of housing sites coming forward in West Oxfordshire are less than 40 – 50 units in scale and under Policy H3 of the Local Plan (recently adopted) the Council is now able to secure on-site affordable housing on schemes of 11 or more units. This has already helped to deliver much needed affordable homes including in rural areas and is expected to continue to do so.
- 2.46. To suggest that the threshold is raised so that no affordable housing would be sought on schemes of up to 50 units is a serious risk to affordable housing delivery. The consultation paper itself acknowledges that delivery of new affordable homes will fall by up to 20% but concludes that raising the threshold would make more sites viable for SME developers and increase the pace of their delivery.
- 2.47. No evidence is provided to this effect, it is simply based on anecdotal assertions that in some way existing policy requirements for affordable housing are in any way hampering SMEs from bringing forward schemes of this scale.
- 2.48. The Government's practice guidance on viability is very clear that policy requirements such as affordable housing provision should be reflected in the price paid for land. On

this basis, there should be no viability issue as the lower value of any affordable housing provision, should be absorbed by the landowner.

- 2.49. To suggest that raising the threshold for provision to 40 or 50 units will assist with viability runs entirely counter to the Government's own practice guidance. The reality is that it will make little difference to the pace of housing delivery but will severely impact on the number of affordable homes delivered.

Extension of Permission in Principle to major developments

- 2.50. The final element of the consultation relates to the granting of Permission in Principle which was first introduced in 2017 as a new, faster way of obtaining planning permission for housing-led development.
- 2.51. Initially, this related to sites identified as suitable for housing on local authority brownfield land registers but was extended in 2018 to include minor developments of fewer than 10 homes.
- 2.52. There are two stages; the first stage 'Permission in Principle' establishes whether a site is suitable for development. This grant of permission is for five years and no planning conditions can be attached to it. The second stage (technical details consent) is when the detailed proposals are assessed and conditions can be attached accordingly.
- 2.53. The Government's separate White Paper proposes that in due course, land allocated for substantive development in Local Plans will be automatically granted a form of permission in principle. Because those proposals will take some time to come into effect, the Government is proposing a shorter-term change to remove the current restrictions in the Permission in Principle regulations on major development.
- 2.54. Thus it would be possible for schemes of 10 – 150 units to be progressed via an application for Permission in Principle (noting that 84% of applications for residential development are for schemes of this size which deliver 46% of new housing development each year).
- 2.55. The Permission in Principle route would not generally be applicable to schemes which comprise EIA development or for sites which are likely to have a significant effect on a European site (e.g. Oxford Meadows).
- 2.56. Importantly, the current Permission in Principle arrangements allow for other, non-residential uses to be included alongside housing (e.g. office, retail) but capped at a limit of 1,000 sq.m/1 hectare. Under the proposed changes, there would be no cap set on any non-residential element, although proposals would continue to be expected to be housing-led.
- 2.57. Notably, procedural arrangements including the current 5-week determination period and 14-day public consultation period, as well as the information requirements expected of applicants, would remain largely unchanged despite the fact that schemes of up to 150 homes could be considered via the Permission in Principle Route. As part of the consultation, views are sought on whether additional information on building heights should be provided or not.
- 2.58. In terms of publicity, the intention is to give applications for Permission in Principle on larger sites additional coverage like a regular planning application – either through social media or a more traditional notice in a newspaper.
- 2.59. In terms of application fees, a banded fee structure is proposed according to site size but would be capped for larger sites of more than 2.5 hectares to act as an incentive for applicants to go down the Permission in Principle route in preference to securing outline planning permission.

- 2.60. It is also proposed that sites which are brownfield and secure consent through the Permission in Principle route will be recorded on Part 2 of the local authority's brownfield land register.
- 2.61. General views are sought on what additional guidance may be needed to support the Permission in Principle option as well as the potential costs and benefits which the proposals might cause.

Officer Response

- 2.62. Officers have significant concerns about these proposals. Whilst the concept of granting Permission in Principle for sites identified on brownfield land registers and smaller sites of fewer than 10 dwellings is accepted, to open up the approach in respect of much larger sites including undeveloped, Greenfield sites creates a number of concerns including the lack of a robust evidence base upon which judgements about suitability / acceptability can be made.
- 2.63. In short, Officers would question how a sensible judgement can be made on the suitability of a greenfield site of say 100 – 150 units when the applicant is only required to submit a description of the proposed development, information on the number of dwellings, the amount of any non-residential development, the size of the site and a brief description of any supporting information that is accompanying the application. The only additional information highlighted in the consultation paper relates to building heights.
- 2.64. Officers also have concerns about the proposals to remove the current cap on the proportion of non-residential development which can come forward as part of a residential scheme under Permission in Principle. It is essential that some sort of proportional limit is imposed. Relying on schemes being 'housing-led' with housing occupying the 'majority of the floorspace of the overall scheme' could in theory lead to a proposal with 51% housing and 49% non-residential uses.
- 2.65. Whilst this is an extreme example, it would appear possible under the current proposals and raises significant concerns about the ability of such proposals to be properly scrutinised and assessed in light of appropriate evidence.
- 2.66. Concerns are also raised about the potential for lack of sufficient publicity and community engagement as well as the proposed fee arrangements which are clearly intended to incentivise applicants away from outline planning applications and towards the Permission in Principle route, notwithstanding the fact that such applications will still place a considerable resource burden on the local authority.

Conclusion

- 2.67. The proposed changes to the planning system have some merit, but raise a number of concerns.
- 2.68. In principle, the concept of a standardised approach to housing need is sensible in providing greater certainty and reducing unnecessary and lengthy debate. However, there are known limitations with using trend-based household projections, particularly when short-term migration trends are used, and the relationship between housing delivery and affordability is complex, meaning that whilst an adjustment for housing affordability clearly needs to be factored in, this should not be at the expense of ridiculously high (and undeliverable) levels of housing need.
- 2.69. The principle of First Homes is supported, but should not be imposed in blanket fashion at the direct expense of other affordable housing products. There are also concerns about the possibility of allowing market housing on First Home exception sites (which should not be necessary from a viability perspective) as well as the suggested removal of

a site-size threshold which lacks clarity and is likely to lead to large-scale proposals coming forward in inappropriate locations.

- 2.70. Significant concerns are raised about the prospect of increasing the affordable housing threshold to 40 or 50 units, even on a temporary basis. There will clearly be a significant reduction in affordable new homes coming forward and the evidence to suggest it would in any way expedite medium-scale housing schemes coming forward via SMEs is non-existent.
- 2.71. Finally, significant concerns are raised in respect of the proposed extension of the permission in principle to cover major development. Whilst the separate White Paper proposes that land allocated for substantive development in Local Plans is automatically granted a form of permission in principle, with a Local Plan process, there is the opportunity to consider in detail the suitability of the proposed allocation and thereby justify (or otherwise) some form of permission in principle.
- 2.72. However, what is proposed through this consultation appears to be a simple 'side-stepping' of the current outline planning application route in favour of a simpler and less onerous permission in principle route with more favourable application fees to act as an incentive. There would be less time for members of the public to comment, potentially extensive non-residential development 'badged' as housing-led development and importantly, a much reduced requirement for supporting evidence and justification upon which a sensible decision can be made.

3. FINANCIAL IMPLICATIONS

- 3.1. This report has no financial implications.

4. LEGAL IMPLICATIONS

- 4.1. This report has no legal implications.

5. ALTERNATIVE OPTIONS

- 5.1. The report and response set out the reasoning for the proposed comments. Cabinet is free to add to or vary those comments as it sees fit.

6. BACKGROUND PAPERS

- 6.1. Changes to the current planning system: consultation on changes to planning policy and regulations (August 2020)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907215/200805_Changes_to_the_current_planning_system_FINAL_version.pdf

WODC proposed response to Government consultation on changes to the current planning system

The standard method for assessing housing numbers in strategic plans

Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

In principle, the concept of a standardised approach to housing need is sensible in providing greater certainty and reducing unnecessary and lengthy debate. However, there are known limitations with using trend-based household projections and it is understood that the 2018-based projections are based on migration data over a 2-year period (2016 – 2018) which is likely to artificially inflate the starting point for assessing housing need for many local authorities.

A good case in point is neighbouring Cotswold District, where the revised standard method suggests a three-fold housing increase to over 1,200 homes per year is needed – clearly an anomaly created by strong recent growth – and clearly highlighting the well-known limitations of using short term trend-based projections to determine future levels of growth.

In terms of the existing dwelling stock, the consultation paper gives little justification for factoring in the number of existing dwellings to future calculations of need, other than to suggest that they are stable and something of a known quantity.

Because no clear explanation is provided, it appears that consideration of the existing dwelling stock has only been factored into the calculation in order to help push up the baseline starting point in areas where the latest household projections may be relatively low. This does not appear to be either appropriate or justified.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

See response above - the consultation paper gives little justification for factoring in the number of existing dwellings to future calculations of need, other than to suggest that they are stable and something of a known quantity.

It also unclear why 0.5% is considered to be the most appropriate 'benchmark'. For this reason it is impossible to comment on whether 0.5% is appropriate or not.

Because no clear explanation is provided, it appears that consideration of the existing dwelling stock has only been factored into the calculation in order to help push up the baseline starting point in areas where the latest household projections may be relatively low. This does not appear to be either appropriate or justified.

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

The Council accepts that some sort of adjustment for market signals/housing affordability is appropriate and this may include consideration of workplace-based median house price to median earnings ratios.

However, whilst affordability is clearly a key consideration, in reality there is little evidence to suggest that increasing housing supply in any way suppresses existing market sales values or rents and improves affordability.

It is therefore essential that any market-signal related adjustment for affordability is a sensible one that does not result in unrealistically high indication of need that even if it were able to be achieved, would in reality do little to bring down the market value of new housing.

This is particularly relevant given that the consultation proposes to remove the cap which currently limits the level of increase for individual authorities.

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

As above – the Council accepts that some sort of adjustment for market signals/housing affordability is appropriate and this may include consideration of changes in affordability over the last 10 years.

However, whilst affordability is clearly a key consideration, in reality there is little evidence to suggest that increasing housing supply in any way suppresses existing market sales values or rents and improves affordability.

It is therefore essential that any market-signal related adjustment for affordability is a sensible one that does not result in unrealistically high indication of need that even if it were able to be achieved, would in reality do little to bring down the market value of new housing.

This is particularly relevant given that the consultation proposes to remove the cap which currently limits the level of increase for individual authorities.

Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

As above – the Council accepts that some sort of adjustment for market signals/housing affordability is appropriate. However, it is essential that the standard method does not give it too much weight, resulting in an unrealistically high indication of need that even if it were able to be achieved, would do little to bring down the market value of new housing.

In reality, there is little evidence to suggest that increasing housing supply in any way suppresses existing market sales values or rents and improves affordability. As such, whilst affordability should be taken into account, the amount of weight it carries in upwardly adjusting the baseline demographic starting point must be tempered accordingly.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

The transitional arrangements appear appropriate in respect of those authorities which have reached publication of their Local Plan under Regulation 19. 6 months from publication to submission should be more than sufficient in the vast majority of cases.

Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?

If not, please explain why. Are there particular circumstances which need to be catered for?

Whilst this proposal appears sound in principle, it lacks clarity. What does ‘close to publishing’ actually mean in practice? This will need to be clarified further as many authorities are likely to argue that they are close to this stage in order to proceed with their existing evidence base.

Notwithstanding this lack of clarity, the principle of giving such authorities 9 months to submit their plan appears appropriate.

Delivering First Homes

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of off-site contributions towards First Homes where appropriate.

Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.

ii) Negotiation between a local authority and developer.

iii) Other (please specify)

The concept of First Homes as an additional form of affordable home ownership is supported in principle, however the proposals raise a number of concerns, in particular the prescription of a top-down specific percentage of First Homes (minimum 25%) that must be delivered as a proportion of all affordable housing units.

Whilst First Homes clearly have the potential to play an important role in supporting first-time buyers and others wishing to step onto the housing ladder, it is essential that this is not achieved at the expense of other forms of affordable housing which have an equally important role to play but are less favoured by developers because of the lower return – social rented housing being a case in point.

Clearly the imposition of a set, national policy requiring 25% of all affordable homes to be First Homes, could artificially skew delivery towards affordable home ownership and away from rented need which may well be more critical.

If the proposal to stipulate 25% First Homes is brought into effect, a combination of options i) and ii) above would seem to be the most sensible – in other words to take any existing Local Plan policy requirement in respect of tenure mix but to discuss the ongoing appropriateness of that tenure mix in light of the 25% First Home requirement and any other material considerations such as up to date evidence of local need.

With regards to current exemptions from delivery of affordable home ownership products:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?

Yes – as the focus for build to rent is on those wishing to rent rather than buy, it would be appropriate to exempt such provision from having to provide First Homes as a type of affordable product. The focus should remain on affordable rent.

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

The Council considers that all existing exemptions are required.

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

The Council does not consider any additional exemptions are required.

Q12: Do you agree with the proposed approach to transitional arrangements set out above?

Yes.

Q13: Do you agree with the proposed approach to different levels of discount?

The Council welcomes the proposal for local discretion to increase the discount to 40% or 50%, evidenced through the local plan making process, in high value areas if First Homes are to be genuinely accessible to median income earners.

However, where this adversely affects viability and reduces the overall level of affordable housing that can be sought, local authorities should be able to set a lower than 25% requirement for First Homes to maintain delivery of affordable housing at current levels.

Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

No. The Government's planning practice guidance on viability is clear that any policy requirements should be reflected in the price paid for land. There should be no need to cross subsidise First Homes through the provision of any element of market housing.

In short, the cost of providing First Homes should be absorbed by the landowner and even at say 70% of market value, the 'premium' over existing land value on many sites, in particular greenfield sites in agricultural use, will be significant.

Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

No – the proposal lacks clarity and would be open to much interpretation. In short, it is likely to lead to large-scale proposals coming forward in inappropriate locations simply on the basis that they are providing First Homes.

Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

Yes - it is essential to retain the existing rural exception sites policy in designated rural areas, and not First Homes. This will allow the Council to continue to provide the right type and tenure of affordable housing for the needs of those rural settlements. Genuinely affordable housing, particularly social rented, is very much needed to retain low paid local workers in sectors such as agriculture, tourism and healthcare that are vital to rural areas.

Supporting small and medium-sized developers

Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?

No – the Council is strongly opposed to the proposed increase in the small-sites threshold, even on a temporary basis. The consultation paper itself acknowledges that delivery of new affordable homes will fall by up to 20% and argues that raising the threshold would make more sites viable for SME developers and increase the pace of their delivery.

However, no evidence is provided to this effect, it is simply based on anecdotal evidence and assertion that in some way existing policy requirements for affordable housing are in any way hampering SMEs from bringing forward schemes of this scale.

The Government's practice guidance on viability is very clear that policy requirements such as affordable housing provision should be reflected in the price paid for land. On this basis, there

should be no viability issue as the lower value of any affordable housing provision, should be absorbed by the landowner.

To suggest that raising the threshold for provision to 40 or 50 units will assist viability runs entirely counter to the Government's own practice guidance. The reality is that it will make little difference to the pace of housing delivery but will severely impact on the number of affordable homes delivered.

Q18: What is the appropriate level of small sites threshold?

i) Up to 40 homes

ii) Up to 50 homes

iii) Other (please specify)

The Council considers that existing thresholds should be retained, particularly in rural districts, where large scale development and therefore opportunities for delivery of affordable housing are limited.

Q19: Do you agree with the proposed approach to the site size threshold?

No - The Council believes it will be detrimental to the delivery of affordable housing. See response to Question 17 above.

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

The Council does not consider that the threshold should be raised even on a time-limited basis for the reasons set out above.

Q21: Do you agree with the proposed approach to minimising threshold effects?

The Council is concerned that the proposed raising of the threshold will encourage developers to artificially split larger sites into phases to circumvent the need to provide affordable housing. Whilst the consultation states the intention to introduce measures to minimise the impact of this potential threshold effect, no detail has been provided yet on how this will be achieved.

It is clearly an important issue to address should the proposal to increase the threshold be taken forward and clarity should be provided as soon as possible.

Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?

Yes - The Council agrees that in designated rural areas the current threshold should be retained.

Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

No. Notwithstanding the District Council's concerns outlined below – if the proposed extension to the Permission in Principle consent regime is taken forward, this would clearly (rightly or wrongly) offer support to SME builders by placing less burden on them to justify and inform their proposals at the 'in principle' stage.

Extension of the Permission in Principle consent regime

Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?

No – the Council has significant concerns about the proposed extension of the Permission in Principle consent regime to larger development proposals.

Whilst the concept of granting Permission in Principle for sites identified on brownfield land registers and smaller sites of fewer than 10 dwellings is accepted, to open up the approach in

respect of much larger sites including undeveloped, Greenfield sites creates a number of concerns including the lack of a robust evidence base upon which judgements about suitability / acceptability can be made.

How can a sensible judgement be made on the suitability of a greenfield site of say 100 – 150 units when the applicant is only required to submit a description of the proposed development, the number of dwellings, the amount of any non-residential development, the size of the site and a brief description of any supporting information that is accompanying the application. The only additional information highlighted in the consultation paper relates to building heights.

The proposed extension of permission in principle to larger schemes should work its way through consultation on the White Paper and if it is taken forward, this should be through the plan-making process only, allowing for local authorities to collate the appropriate evidence and for it to be scrutinised at examination before being confirmed.

It should not be applicable to major development brought forward through the development management process as to do so would present a clear risk in terms of the absence of robust supporting information upon which to make an in principle decision in respect of suitability.

Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

Yes – there should be a limit imposed on any non-commercial element as is currently the case with smaller sites. As currently worded, ‘housing-led’ could lead to a scheme which is 51% housing and 49% non-housing coming forward under Permission in Principle.

Whilst this is an extreme example, it demonstrates the risk in not setting a limit on the proportion of non-residential floorspace.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

The consultation paper suggests that the only additional information which would be sought in respect of a major housing scheme of up to 150 units would be information on building heights. The Council is concerned about the ability to make a robust and informed decision on the suitability of a site for housing and non-housing uses based on the minimal information listed including site area, description etc.

Whilst it is acknowledged that the regulatory and technical burdens on applicants should not be too onerous, at the same time, it should not be the case that a local authority will be expected to grant Permission in Principle for potentially large and contentious development proposals based on a bare minimum amount of information.

Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

As above, whilst building heights may well be an important consideration, there is likely to be further additional information needed by the local authority to make a suitably informed and robust decision on site suitability, particularly for larger development proposals.

The District Council has concerns that local authorities will be expected to grant Permission in Principle for potentially large and contentious development proposals based on a bare minimum amount of information.

Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?
- ii) subject to a general requirement to publicise the application or
- iii) both?
- iv) disagree

If you disagree, please state your reasons.

Given the relatively rapid turnaround for a decision (5-week determination) it is vital that any such application for Permission in Principle is given maximum publicity as early as possible. This should include a site notice, a notice in a local newspaper, across social media and any other appropriate channels of communication.

Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

Whilst in simple terms it seems reasonable for a lower fee to be applicable to smaller sites, which is then increased accordingly based on site size, it is difficult to respond properly to this question without further additional information including the average amount of officer time likely to be taken dealing with any such application and information on the level of any 'cap' which would be imposed in respect of larger development proposals.

Whilst the resource requirements associated with a Permission in Principle application are likely to be less than an outline or detailed planning application, they are not insignificant and it would be helpful to see a worked example on the likely number of Officer hours to determine a larger Permission in Principle application set against further information on the level of any cap likely to be imposed.

Without this analysis it is impossible to determine whether the proposed fee structure is reasonable or not.

Q30: What level of flat fee do you consider appropriate, and why?

See answer to Question 29 above.

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

Yes – there is no reason not to include any such site on the Brownfield Land Register.

Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

Clear guidance on the purpose, scope and remit of the Permission in Principle option along with clarity on the supporting technical information needed in support of any such application. Also clear guidance for local authorities on the basis upon which decisions should be made including the inter-relationship with local planning policy and the NPPF and the role of statutory consultees in providing advice.

Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

The District Council has significant concerns about these proposals. Whilst the concept of granting Permission in Principle for sites identified on brownfield land registers and smaller sites of fewer than 10 dwellings is accepted, to open up the approach in respect of much larger sites including undeveloped, Greenfield sites creates a number of concerns including the lack of a robust evidence base upon which judgements about suitability / acceptability can be made.

The proposed extension of permission in principle to larger schemes should work its way through consultation on the White Paper and if it is taken forward, this should be through the plan-making process only, allowing for local authorities to collate the appropriate evidence and for it to be scrutinised at examination before being confirmed.

It should not be applicable to major development brought forward through the development management process as to do so would present a clear risk in terms of the absence of robust supporting information upon which to make an in principle decision in respect of suitability.

Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

Subject to greater publicity and clarity over the process, it is likely that landowners and developers are extremely likely to take advantage of the relatively streamlined process associated with Permission in Principle.

As set out above however, the District Council has significant concerns about the consideration of large development proposals through this route in the absence of sufficient, robust supporting information upon which to make sensible, informed decisions, particularly given the rapid expected turnaround of 5 weeks for a decision.

Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?

If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?

If the proposals in relation to Permission in Principle are taken forward, it is vital that adequate publicity is given to any such applications through a range of different media so as to not discriminate against people who cannot afford to access a computer or a smartphone or do not have the skills to use them.



WEST OXFORDSHIRE
DISTRICT COUNCIL

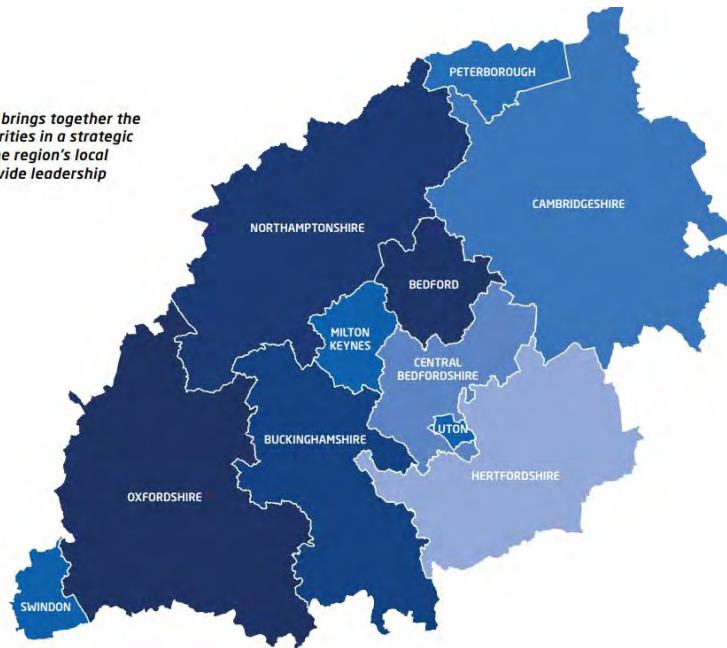
WEST OXFORDSHIRE DISTRICT COUNCIL

Name and date of Committee	Cabinet: Wednesday 23 September 2020
Report Number	Agenda Item No. 12
Subject	England's Economic Heartland Draft Transport Strategy
Wards affected	ALL
Accountable member	Councillor Jeff Haine Cabinet Member for Strategic Planning Email: jeff.haine@westoxon.gov.uk
Accountable officer	Chris Hargraves Planning Policy Manager Tel: 01993 861686; Email: Chris.Hargraves@publicagroup.uk
Summary/Purpose	To agree a response to the England's Economic Heartland (EEH) Draft Transport Strategy
Annex	Annex A – Proposed WODC response to the England's Economic Heartland (EEH) Draft Transport Strategy
Recommendation	That the content of the report be noted, and the proposed response to the draft transport strategy attached at Annex A be approved, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.
Corporate priorities	
Key Decision	No
Exempt	No
Consultees/ Consultation	None

I. BACKGROUND

- I.1. England's Economic Heartland (EEH) brings together the region's Local Transport Authorities in a strategic partnership that works with the region's local enterprise partnerships to provide leadership on strategic infrastructure. It is effectively a strategic partnership of political and business leaders, stretching from Swindon to Cambridgeshire and from Northamptonshire to Hertfordshire. The partnership includes Oxfordshire County Council.
- I.2. The area is covered by EEH is shown on the map below. It includes the Oxford-Cambridge Arc, which has been made a national priority by Government.

England's Economic Heartland brings together the region's Local Transport Authorities in a strategic partnership that works with the region's local enterprise partnerships to provide leadership on strategic infrastructure.



- I.3. EEH is the sub-national transport body for the region and has prepared a draft transport strategy which aims to set out a bold new approach to connectivity which will enable the region's transport system to support a green recovery from COVID-19 and sustainable economic growth in the decades which follow, while reaching net zero carbon emissions no later than 2050.
- I.4. The draft strategy is the subject of public consultation which closes at midnight on 6 October 2020.
- I.5. The strategy includes measures to:
- Work with the area's world-leading innovators to trial and deploy cleaner and smarter connectivity across the region;
 - Champion investment in better digital connectivity to increase people's ability to work from home, reducing the need to travel;
 - Maximise the potential of East West Rail and use it as the catalyst for transforming public transport across the region;
 - Enhance walking and cycling infrastructure and 'shared transport' to improve local connectivity; and
 - Ensure the region's freight and logistics needs continue to be met, while lowering their environmental impact.
- I.6. The purpose of this report is to provide a brief summary overview of the draft strategy together with the general view of Officers. Attached at [Annex A](#) is a suggested draft

response to the consultation which Members are asked to agree as the Council's formal submission. It should be noted that Oxfordshire County Council are proposing to submit a response to the consultation and there will also be a collective response dealing with strategic matters submitted through the Oxfordshire Growth Board.

- 1.7. The Development Control Committee will be considering this report at its meeting on 21 September, and its views will be reported. Members are asked to agree [Annex A](#) as the Council's formal response to the consultation, subject to any amendments at this meeting, including any arising from the Development Control Committee's consideration.

2. **EEH DRAFT TRANSPORT STRATEGY - A SUMMARY OVERVIEW**

- 2.1. The draft strategy aims to sets out a new approach to the planning, development and implementation of strategic infrastructure and services at the regional level. It highlights the critical importance of considering future investment requirements for digital and utility infrastructure alongside that for transport, creating a co-ordinated approach to the planning, development and implementation of strategic infrastructure that together delivers connectivity that the region needs.
- 2.2. It identifies a need to invest in maintaining existing infrastructure assets, deliver planned investment in additional capacity to meet future connectivity needs, and plan for the additional investment that enables sustainable growth, while at the same time preserving the natural and historic environment.
- 2.3. It suggests that only by planning and delivering investment in strategic infrastructure (transport, digital and utilities) as a whole will we have the connectivity that allows us to realise the region's economic potential in a way that respects both local commitments to the environment and the national legal requirement to achieve net-zero greenhouse gas emissions by 2050.
- 2.4. The proposed vision is as follows:
- 'To realise sustainable growth opportunities and improve the quality of life and wellbeing for Heartland residents and businesses, by harnessing the region's globally renowned centres of innovation to unlock a world class, de-carbonised transport system'.***
- 2.5. This is supported by four key principles:
- Achieving net-zero carbon emissions from transport no later than 2050;
 - Improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel;
 - Supporting the regional economy by connecting people and businesses to markets and opportunities; and
 - Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways.
- 2.6. The vision and principles are informed by previous consultation which has identified a number of key issues including the imperative of responding to the climate emergency, the importance of harnessing technology and innovation, the need to work closely with local planning authorities, putting the environment at the forefront, being bold not 'business as usual' reducing the need to travel, increasing sustainable modes, supporting health outcomes and the importance of implementation.
- 2.7. As part of the preparation of the strategy, opportunities mapping has led to the identification of the following areas as being of strategic importance:

- Regionally Significant Hubs – the largest urban areas, centres of economic activity in their own right and where additional growth is planned;
- Areas of Economic Opportunity – areas that form the focus of economic opportunities moving forward, a combination of existing centres of activity and new opportunities (including Enterprise Zones);
- Areas of Significant Change – existing urban areas where the scale of planned growth is significant relative to their size;
- Areas of Potential – areas where intervention is required to improve social equality and access to opportunities.

2.8. Eynsham is identified as an area of significant change and Oxford is identified as a regionally significant hub. Science Vale/Didcot is identified as both an area of economic opportunity and an area of significant change.

2.9. For areas of significant change such as Eynsham and Science Vale/Didcot, the strategy seeks to ensure that they are supported by investment in local connectivity and inter-urban and intra-regional connectivity.

2.10. The strategy also recognises the importance of supporting the region's market towns and their rural hinterland.

2.11. Policies in the strategy are divided into four themes. These are:

- A transport system for the future;
- Transforming journeys;
- Connecting people with opportunities; and
- Making the heartland work for the UK.

A transport system for the future

2.12. Transport is now the largest sector for UK greenhouse gas emissions (28%), of which road transport accounts for over 90% and this section focuses on the decarbonisation of the transport system to achieve net zero greenhouse emissions by 2050.

2.13. Assuming 100% zero-emissions cars, light goods vehicles (LGVs), heavy goods vehicles (HGVs) and public service vehicles (PSVs, for example buses and coaches) on the network by 2050, the strategy identifies two main areas of activity:

- Creating a highly connected transport system that provides better transport information to the user, better management of the transport network, and the rapid deployment of connected and autonomous vehicles;
- Enabling a policy-led behavioural shift where levers are applied to reduce the number of car trips. This approach will require careful consideration in the application of demand management measures. In parallel, it requires a commitment to ensure local communities have real choice in the way they travel.

2.14. It is suggested that this provides an affordable alternative to traditional, large-scale road projects that take many years to plan, fund and deliver.

2.15. This section also addresses mobility and the need to promote and enable active travel for example through the 'greening' of existing transport routes as well as the need to support public transport and other alternative modes of travel.

2.16. Policies on decarbonisation focus on issues such as electrification of the Midland Mainline, delivery of East West Rail as an electrified route, infill electrification schemes that enable

electric haulage of rail freight services and supporting and planning for the decarbonisation of the road fleet.

- 2.17. Policies on increased mobility focus on reducing reliance on the private car by adopting a hierarchal approach which gives priority to active travel, public transport, low emission/zero carbon private vehicles and then other motorised modes.

Transforming Journeys

- 2.18. The primary focus here is on improving east-west connectivity which is seen as providing the overriding transformational opportunity for the region and also unlocking opportunities to improve north-south connectivity.
- 2.19. East West Rail has been at the heart of the region's strategic priorities for 25 years. The core focus is to achieve a step-change in east-west connectivity, linking Ipswich and Norwich with Cambridge, Milton Keynes, Oxford and beyond that towards Swindon and onwards to Bristol and South Wales.
- 2.20. Policies on the East West Rail Main line focus on the delivery of the East West Rail project (including its Eastern Section), with the expectation that Phase 2 of the Western Section is open from Oxford – Bedford by 2024, Aylesbury – Milton Keynes by 2025 and the Central Section by 2030.
- 2.21. Oxford is identified as one of a number of stations where priority will be given to developing proposals to establish regionally significant transport hubs.
- 2.22. The strategy identifies two additional east-west arcs where improved connectivity will support the delivery of planned economic and housing growth:
- A northern arc that links north Oxfordshire, Northamptonshire and Peterborough;
 - A southern arc that links Buckinghamshire, southern Hertfordshire and Cambridgeshire, and which improves orbital connectivity.
- 2.23. It also highlights the strategic importance of improving connectivity between Oxford and Swindon.
- 2.24. As such, policies seek to prioritise improvements to east-west connectivity to support economic activity and in support of planned housing growth within these two additional arcs as well as developing proposals that strengthen connectivity between Swindon/Oxford and the South West and South Wales.
- 2.25. The strategy also highlights the importance of improved north-south connectivity along a number of key corridors including Swindon/Didcot – Oxford – Bicester/Banbury which forms part of the strategically important Southampton – Oxford – West Midlands corridor.
- 2.26. Policies include a commitment to working with Government, Network Rail, Highways England and Oxfordshire County Council to develop a long-term solution to challenges on the Didcot – Oxford – Bicester/ Banbury corridor.

Connecting People with Opportunities

- 2.27. This section focuses on improved connectivity, not just physically, but also digitally which is seen as particularly important in areas that currently experience social deprivation, due in part to poor connectivity.
- 2.28. Particular priorities identified include investment in strategic transport infrastructure to improve interregional and intra-regional journeys, opportunities for public transport to create new integration, ticketing and timetabling options and the establishment of 'mobility hubs' that serve local communities within larger urban areas offering the opportunity for 'frictionless' interchange between modes, primarily bus, rail and active travel.

- 2.29. Also identified as a key priority is the need to improve connectivity in small market towns and their rural hinterlands. Particular challenges identified include access to digital connectivity, the digital economy and traditional business models for providing public transport in rural areas which are becoming increasingly unsustainable.
- 2.30. Policies in this section focus on the opportunities created by investment in strategic transport infrastructure and services to shape the location of future economic and housing growth and the development and delivery of high quality, segregated mass transit systems with priority given to Cambridge (the CAM), Milton Keynes and the A414 corridor in Hertfordshire.
- 2.31. Other policies seek to establish ‘mobility hubs’ in areas of significance, enable frictionless travel using a combination of travel modes and develop tailored solutions for smaller market towns and rural areas that improve local connectivity.

Making the Heartland Work for the UK

- 2.32. The fourth theme focuses on the importance of connecting the region globally both physically and digitally. The strategy seeks to actively encourage investment in improved surface access connectivity that reduces the environmental footprint of key gateways including Luton Airport and Heathrow Airport with delivery of the Western Rail Access to Heathrow improving connectivity for large parts of the Thames Valley, including Oxfordshire.
- 2.33. The strategy also seeks to develop proposals that increase freight on the rail network setting out a commitment to working with the freight and logistics sector, along with Network Rail and the EWRCo to develop detailed proposals that will enable the potential for rail freight to be realised.
- 2.34. It recognises however that road haulage will remain an important part of the freight and logistics sector and the strategy sets out a commitment to working with Highways England, local highways authorities and the freight sector to ensure the key parts of the Strategic Road and Major Road Networks continue to support the movement of road haulage and thereby minimise the impact of road freight on local communities. The provision of adequate overnight parking for lorries and the associated facilities is identified as a key issue.

Officer Response

- 2.35. Officers are generally supportive of the draft strategy including the overall vision and principles contained therein. The structuring of the strategy into four main themes is sensible and makes the strategy easy to follow and understand.
- 2.36. As a general observation, many of the ‘policies’ contained within the strategy are effectively commitments to further partnership working or separate projects, rather than specific proposals or requirements.
- 2.37. Given the relatively high-level nature of the strategy this is to largely be expected and is to an extent, addressed by the implementation section of the strategy but the lack of clear, specific proposals for particular priority areas is somewhat frustrating and will need to be picked up and addressed by locally prepared transport plans within the overall context provided by the EEH strategy.
- 2.38. A suggested draft response to the draft strategy is attached at Annex A. The comments are generally supportive but highlight the need for a stronger focus on a number of themes including the role of smaller market towns, the opportunities of Garden Towns and Villages, the importance of healthy place shaping and the post Covid-19 recovery.
- 2.39. Members are asked to endorse [Annex A](#) as the District Council’s formal response to the consultation.

3. FINANCIAL IMPLICATIONS

- 3.1. This report has no financial implications.

4. LEGAL IMPLICATIONS

- 4.1. This report has no financial implications

5. CLIMATE CHANGE IMPLICATIONS

- 5.1. The EEH draft transport strategy highlights an imperative need to respond to the climate emergency as one of its key priorities and includes a number of measures and new solutions intended to decarbonise the transport system.

6. ALTERNATIVE OPTIONS

- 6.1. The report and response set out the reasoning for the proposed comments. Cabinet is free to add to or vary those comments as it sees fit.

7. BACKGROUND PAPERS

- 7.1. England's Economic Heartland Draft Transport Strategy - <http://www.englandseconomicheartland.com/Documents/Draft%20Transport%20Strategy.pdf>

Suggested WODC Response to England's Economic Heartland Draft Transport Strategy

Introduction

West Oxfordshire District Council (WODC) welcomes the opportunity to comment on the EEH Draft Transport Strategy before the final version is published at the turn of the year.

Our response should be read in conjunction with the separate representations made by Oxfordshire County Council and the Oxfordshire Growth Board.

Firstly, we support the vision and key principles contained within the Strategy, including the ambition of developing a net-zero transport network across the EEH region by 2050 and improving quality of life and well-being.

We recognise the importance of developing a strategic and long term strategy to help inform policy and guide the delivery of transport infrastructure across the EEH area. This cannot be done through the electrification of transport only and it is vital for new solutions to be developed to change existing behaviours and to reduce the need to travel. Digital technology and infrastructure will impact on every aspect of our lives, including the way we choose to access services and connect with colleagues and friends.

There will be many challenges which will need to be overcome in order to meet the objectives set out in the Strategy including practical, political, policy and funding challenges. By working in partnership with others across the England's Economic Heartland and the OxCam Arc, we can be strongly positioned to successfully transform connectivity across the region.

As a general observation, many of the 'policies' contained within the strategy are effectively commitments to further partnership working or separate projects, rather than specific proposals or requirements.

Given the relatively high-level nature of the strategy this is to largely be expected and is to an extent, addressed by the implementation section of the strategy but the lack of clear, specific proposals for particular priority areas is somewhat frustrating and will need to be picked up and addressed by locally prepared transport plans within the overall context provided by the EEH strategy.

Notwithstanding, our response is focussed on a range of connectivity themes which are explored in the Strategy and which have particular relevance to our District, as set out under the following headings.

Digital infrastructure

We fully agree that the future of our transport system is as much a consideration of digital infrastructure as a way of connecting as it is physical infrastructure. Therefore we strongly support future investment in digital connectivity across the EEH area. The pandemic has resulted in virtual communications becoming much more dominant across many sectors and this trend is unlikely to be reversed.

Digital connectivity will shape how we communicate and access services/ work and this is ever evolving. There are vast opportunities to utilise digital infrastructure to improve our experience when using our transport network and encourage sustainable travel modes. For example, it could transform how we pay for services, eliminating the need for hard ticketing and allowing other complementary services such as renting an e-bike or even just ordering a coffee to be paid for as one transition creating a much more user-friendly service.

As such, continued and significant investment is critical to ensure digital infrastructure plays a positive role in helping to manage demand but also to promote healthy and sustainable travel choices.

Customer focussed

We agree with the objective of putting the user at the heart of the transport system. This is essential if we are to change travel behaviour and reduce the reliance on private vehicles. Whilst the Strategy recognises the importance of changing travel behaviour (in particular on page 29), it would be useful if this was included as a separate policy given the importance of changing travel behaviour in de-carbonising our transport system.

This policy could include a list of possible tools/ measures which are necessary to achieve this. Initiatives such as improving fragmented active travel routes, reinforcing our town centres as hubs of connectivity and streamlining ticketing for buses and trains are a few possible measures.

Post Covid-19 recovery

The challenges of Covid-19 have also created opportunities to do things differently and this should be harnessed whilst the number of trips remains low. Whilst there is an acknowledgment that the landscape has changed significantly due to the pandemic, there should be a much stronger Covid-19 recovery section within the Strategy given the radical change this is likely to have in the longer term which affects all strands of the Strategy.

As an example, travel patterns have radically changed with a higher proportion of home working and railway season tickets no longer meet the needs of commuters. Moving forward we need to consider how people will access work, services and leisure opportunities and have flexibility in the system to support this through modal share opportunities and advances in ticketing systems which allow multiple travel options to be accessed through one transaction.

Salt Cross Garden Village near Eynsham

We welcome the identification of the Eynsham area as an 'area of significant change' due to the proposed Garden Village to the north of the A40 (previously known as the Oxfordshire Cotswolds Garden Village which has now been renamed Salt Cross). However, we have concerns that this terminology could have negative connotations and could be misinterpreted. We would suggest that this should be referred to as a 'key location for growth'.

In addition, we consider that this area should be identified as an 'area of economic opportunity' to reflect the substantial Science and Technology Park proposed as part of the Garden Village. This will consist of 80,000 sq metres of science, technology, engineering and high-tech related B-class business floorspace.

Given the location of Eynsham, close to Oxford and on the edge of the Oxfordshire 'knowledge spine', this area is a key economic 'hotspot' with significant economic growth potential as recognised in the Local Industrial Strategy.

The table on page 22/23 sets out a list of places of strategic importance. We strongly suggest that Government approved new garden towns and garden villages are recognised separately within this table. There is considerable scope to embed new travel behaviours and technologies as part of these settlements as they are not faced with the same constraints as established centres.

Therefore, there are unique opportunities for healthy place shaping as well as new technologies and living laboratories to be at the centre of the planning process and there should be a greater focus on these opportunities so they can be planned at an early stage.

Healthy place-shaping and active travel

We support the objective of improving quality of life and well-being but we consider that there should be a stronger focus on the importance of healthy place-shaping in improving residents' quality of life and wellbeing (including mental health) by supporting healthy travel choices. Healthy place shaping initiatives can also play an important role in increasing the percentage of first and last mile trips by foot and cycle rather than car.

Creating new and improved off-road connections to serve pedestrians and cyclists is critical to the Strategy to increase active travel opportunities and change travel behaviour. These need to be safe and convenient with appropriate lighting and street furniture/ signage to guide the user. Fragmented routes need to be completed/ improved so that the user can easily and safely reach their destination, including those with disabilities

We support Policy 4 which sets out a hierarchy of transport modes and which prioritises the needs of active travel modes beyond others. However, there may be cases where it is more appropriate to prioritise public transport (on a key bus routes for example) and therefore there needs to be an element of flexibility.

Cycling in Oxford is particularly high as a modal share but this quickly diminishes beyond the city. Where there are cycling 'hot-spots', the Strategy should support opportunities to extend this out through strong cycle connections to surrounding areas, particularly key housing and employment centres.

The role of town centres as 'mobility hubs'

We generally support Policies 25 to 27 and we believe that the development of 'mobility hubs' is an important element of the Strategy. These opportunities include the strengthening of interchanges in town centres and high frequency bus routes or rural stations.

The use of town centres, particularly serving rural areas, is radically changing away from retail being the dominant use. Considering the future use of these centres is vital to support our economy. As working practices becomes more flexible in terms of the spaces used, these centres could have a crucial role in providing flexible spaces for people to work and for small businesses to grow where they can form a cluster and be supported by other services and leisure activities such as gyms, cafes and shops, benefitting the wider economy.

This Strategy should consider how it can play a part in supporting these town centres to become 'mobility hubs', reducing the reliance on the private car and allowing sustainable first and last mile travel choices to be accessed. Initiatives such as creating pedestrian zones and improving the attentiveness of external spaces will help to draw more people and business into these areas.

Serving rural communities

West Oxfordshire has an aging population and this trend is likely to continue. The challenges of providing environmentally friendly transport to serve the elderly population in rural communities has long been a challenge.

There has been a decline in traditional public transport modes, particularly in rural areas and we agree that technology needs to be harnessed to help create new models of connectivity, perhaps through solutions such as driverless shuttles and other smart travel solutions. Investment in training initiatives should also play a key role to allow all age groups to access services.

Whilst the car is likely to remain more dominant in rural areas, there may be opportunities to reduce the number of miles travelled using private transport by providing accessible and high quality parking facilities at 'mobility hubs' such as railway stations to encourage the use of sustainable travel for the bulk of the journey, accepting that part will be travelled by car. This should be alongside other initiatives such as active travel connections to 'mobility hubs' and town centres.

Electrification of the transport network

We fully support the electrification of trains, buses and vehicles across the EEH area as proposed in Policies 1 and 2. As recognised in the wider Strategy, this is just one of many initiatives and this should be supported alongside the reduction on overall journey numbers and increasing active travel.

Although the electrification of the transport system is a major first step in de-carbonising the transport network, there could be a reference made to future options such as the potential for hydrogen in the longer term.

Importance of key corridors

Whilst we recognise that this strategy is strategic in nature and is framed around policy rather than being geographically focused, we continue to highlight the importance of key connections within Oxfordshire including the A40 corridor between Oxford/ Witney (and beyond) and the rail upgrades on the Cotswold line running between Oxford and Evesham.

It is important that there is a focus on how upgrades can de-carbonise the network and promote active travel and public transport, such as the creation of bus lanes and cycle ways. For example the A40 corridor is planned to provide an integrated route with convenient public transport choices and a Park & Ride.

Within the investment pipeline table on pages 57-59, the A40/ A34 should be included within the area/ corridor studies.

Freight

We agree that the freight sector is often overlooked and this will be a critical consideration going forward. Freight movements are likely to increase and therefore it's vital to consider how this demand can be accommodated in an environmentally sensitive way through the use of rail and transport tubs as well as considering how developing technologies play a part in this.

EEH is well placed to play a key role in assisting in the co-ordination of methods to reduce emissions resulting from freight movements through the work undertaken in the EEH Freight Study, including understanding the opportunities and potential benefits of transferring a greater proportion of freight to the existing and future planned rail network.

Conclusion

To conclude, overall WODC is supportive of the Draft EEH Transport Strategy but the Council considers that there should be a stronger focus on the themes identified above and in particular on the role of smaller market towns, the opportunities of Garden Towns and Villages, the importance of healthy place shaping and the post Covid-19 recovery.

We trust you find this response helpful. If you wish to discuss any of the points raised, please feel free to get in touch.