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By email:
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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Consultation on OxLEP Strategic Economic Plan refresh May 2016 - Response from CPRE Oxfordshire

Q1 Does the SEP capture the main characteristics of the Oxfordshire economy, its challenges and opportunities? If not, what else could be included?

CPRE very much welcomes and endorses the identification of the importance to the economy of our built and natural environmental assets.

The document itself does not clearly state what it sees the challenges and opportunities to be, so it is difficult to comment on these. CPRE would suggest that:

- a) The key challenge is how to deliver not 'growth' but 'sustainable development' (that by definition would not damage these assets).
- b) The key opportunity is to maintain and improve the quality of life of Oxfordshire residents, which is dependent on protecting and enhancing our environment and natural capital.

However, the key facts about Oxfordshire infographic (p.11) beautifully sums up the entire problem with this document:

- a) It gives no clear information on the actual number of jobs created since the original SEP.
- b) It does make it clear that Oxfordshire already has a high employment rate.
- c) It also makes it clear that the 5,000 per annum housing target that the jobs growth has generated is completely unrealistic and unachievable.

Therefore, the fundamental strategy of forced economic growth outlined in the original SEP is entirely misplaced and should be revisited.

Although the document acknowledges that much of Oxfordshire is rural, there is no carry over of this fact into any clear strategy to protect, promote or enhance the rural economy.

We reject the concept of the 'Golden Triangle' (p13) which appears to be an entirely spurious and arbitrary notion not conceived in any reality. Cambridge, Oxford and London are distinct and vastly different settlements, with only superficial similarities. To seek to set up some kind of competition for growth between Cambridge and Oxford smacks more of old-boy rivalry than serious planning policy.

The Knowledge Spine (p15) is also a questionable concept, seeking as it does to concentrate more and more jobs in the most congested part of the County, including in Oxford itself where the priority should clearly be the provision of housing. At the same time, we are seeing significant housing development allocated to parts of the County that is not set to benefit from this potential jobs growth (eg Wantage and Banbury).

There is also a mismatch between the rhetoric of 'high-tech jobs' and experience on the ground. Bicester for example is identified as a key part of the Knowledge Spine. However, business development there over the last two years has been dominated by large-scale warehousing which absorbs land but provides few employment opportunities, and certainly not the high-tech jobs promised by the SEP.

Whatever the vision set out by the SEP, the reality on the ground is that housing and jobs are not being co-located and this is setting up unsustainable patterns of growth.

Q2 People - do we have the right priorities and commitments in place? If not, what is missing?

The 'current characteristics' section rightly pays considerable attention to the issue of affordability of housing in the area.

However, this is not carried through into the priorities or commitments which make no specific mention of this issue.

This is a key area where OxLEP could make valuable interventions, but does require a more sophisticated understanding of the housing market than it has shown to date. This is an issue of pricing, rather than supply. Simply building more houses will not bring down prices, as developers are not incentivised to build at a rate that will lower prices and new-build houses are such a small part of the overall market that they make a negligible impact on pricing.

We need to ensure an increased supply of permanent affordable housing, in both urban and rural areas.

OxLEP should seek to work to influence its partners to adopt appropriate policies that would support this. For example:

- Oxford City Council could prioritise development sites for housing, rather than further jobs growth - eg the Osney Mead site.

- The University colleges could bring forward housing development on sites that are already allocated in the 2011 Oxford City Local Plan. (Anecdotal evidence suggests that these are being delayed due to concerns about the high affordable housing rate mandated by the City Council, which if true would be ironic given the Universities' often stated concern about the inability to recruit staff due to a lack of affordable housing.)

OxLEP should also seek to support more innovative solutions to the issue, such as self-build developments (using the Cherwell DC exemplar) and the Community Land Trust model.

Q3 Place - do we have the right priorities and commitments in place? If not, what is missing?

It is difficult to comment on the commitments as there are no significant OxLEP commitments outlined.

We broadly support the priorities outlined in this section, including in particular the county-wide design guide, the standard provision of broadband in new developments and support for the delivery of Neighbourhood Plans.

However, there is a noticeable gap as, despite the fine words about the importance of the natural environment, there is no strategy for its protection or enhancement and no mention in this section of our designated landscapes such as AONBs.

There is also no recognition of the role of the Green Belt in contributing to the quality of life of the population and no attempt to set out any kind of policy for the Green Belt, this despite a reference to the need to recognise, respect and conserve the particular spatial characteristics of the county.

Finally, whilst we welcome the commitment to a low carbon economy, it is concerning that the SEP identifies that Oxfordshire is not currently on track to meet its carbon reduction commitments (potential 32% reduction by 2030, compared to a target of 50%). Until this issue is resolved, this should be considered a significant limiting factor in short to medium term growth.

CPRE therefore believes the SEP should:

- **Recognise the likely negative impacts of development on the environment (preferably through a Strategic Environmental Assessment) and the need for appropriate avoidance, mitigation and compensation strategies.**
- **Explicitly recognise the value of the Green Belt to the local economy and quality of life.**

Q4 Enterprise - do we have the right priorities and commitments in place? If not, what is missing?

What is missing is the word ‘*rural*’ which does not appear once in this section.

Oxfordshire’s market towns accommodate 45% of Oxfordshire’s population. As such, the market towns offer significant business and retail space (46% of the county’s businesses)¹.

Where are the priorities and commitments to support this and to create jobs in the market towns that might soften the impact of the enormous housing growth they are being expected to absorb?

The document makes no reference to the Government’s Rural Productivity Plan (August 2015).²

CPRE believes a much more inclusive approach to small and rural businesses is required which would spread out the benefits of economic growth more evenly across the county and help to minimise the pressure on already over-stretched and struggling traffic infrastructure.

Q5 Connectivity - do we have the right priorities and commitments in place? If not, what is missing?

Tucked away in Annex A Table 1 is the following statement: ‘the evidence gathered by Oxfordshire County Council shows that levels of congestion on Oxfordshire’s roads has increased over recent years’.

This is the reality on the ground that flies in the face of the fine words and statements contained in this section. It is closely connected to the severe air pollution problems experienced within a number of our settlements, including Oxford City, that harm both people and our environment.

OxLEP should commit to ensure that the necessary infrastructure is fully funded and in place to tackle these existing issues and most certainly *in advance* of any significant further growth projects.

Q6 - Does the SEP articulate clearly the roles and responsibilities of OxLEP - both in itself and in relation to other processes?

The description of the governance arrangements mask the truth - that OxLEP is an undemocratic and unaccountable body. As a limited company, it lacks transparency and public credibility.

¹ OxLEP Strategic Economic Plan March 2014

² <https://www.gov.uk/government/publications/towards-a-one-nation-economy-a-10-point-plan-for-boosting-rural-productivity>

Whilst it is perfectly acceptable for a group of businesses to combine to seek to push forward their joint interests, the function of a democratic planning system is to balance these interests against environmental and social interests. Unfortunately there appears to be no forum in which this is currently happening and no assessment of the cumulative impacts of the growth agenda. The title of 'Growth Board' (as compared to 'Sustainable Development Board' for example) speaks volumes.

OxLEP seeks to lay responsibility for the excessive housing numbers at the doors of the District Councils. However, it is responsible for driving 'private sector-led growth and job creation' (p.8). This is in effect the forced economic growth strategy that has generated the overblown figures in the Oxfordshire Strategic Housing Market Assessment. Research commissioned by CPRE suggests that only 50% of the housing numbers in the SHMA are related to local need, including normal rates of job growth, with the other 50% directly related to the forced economic growth strategy³.

It is convenient for OxLEP to pass the buck to our local Councils, just as it suits our Councils to put the onus back on OxLEP, but all parties must bear their share of the responsibility.

The bottom line is the system isn't working - we have unrealistic and unsustainable housing figures generated off the back of a speculative and undesirable growth strategy that has never been presented properly to the Oxfordshire public. This situation is not addressed by the current consultation, which obscures the overall growth targets from comment.

Q7 Additional comments

Consultation process

We believe that the consultation process around the SEP Refresh has been fundamentally flawed. **Most critically, there was no clear presentation of the overall growth targets and the public were not invited to comment on them.**

In addition:

- There is a complete lack of transparency around the relationship between the SEP refresh and the original SEP, including all the targets.
- Changes were made to the document after publication (although subsequently addressed, this showed a failure of understanding around the basics of public involvement).
- The online response form was not fit for purpose (eg forms not accepted unless every question answered).
- Inadequate information was given around alternative ways of responding.

³ Oxfordshire SHMA Note on Local Needs - Alan Wenban-Smith, March 2016 - see [CPRE Oxon website](#)

- There was an inappropriate mandatory sign up for OxLEP emails in order to submit the online response form.
- There was no vision of other responses (eg a local authority consultation would display all responses received).

All of this means that there is very little public confidence in the process, particularly in relation to an adequate reporting of and response to any concerns raised.

OxLEP should therefore commit to an independent review and report of the responses received.

Overall comments

CPRE welcomes the recognition of Oxfordshire's key asset - 'our beautiful environment and the quality of our natural capital resources'. However, this is not carried through into any strategy, priorities or commitments that will protect or enhance this asset.

We believe that growth at the scale and pace OxLEP envisages will actually undermine quality of life, including worsening traffic congestion, increasing pressure on services and infrastructure and damaging Oxfordshire's environment and rural character. All these things are actually vital to a thriving economy - so in the end OxLEP may kill off the very thing it is seeking to enhance.

Economic growth may be desirable, but there is no reason Oxfordshire should bear such a heavy load.

Even if it were desirable, the rate of building proposed is way beyond any likelihood of achievement. It will mean though that greedy developers will cherry-pick the best bits - that is the places where building will be most damaging to us. Already the Green Belt is being carved up. It is a threat to all green spaces.

It is vital that growth is phased, to ensure that delivery of housing, infrastructure and jobs is in tandem.

CPRE Oxfordshire therefore calls for:

- 1. A proper assessment of the impacts of this proposed Strategic Economic Plan,**
- 2. To be followed by a full, separate consultation on the overall growth targets,**
- 3. To be led by a democratically elected and accountable body.**