



Planning for Real **NEED** not Speculator **GREED** in Oxfordshire

## Need not Greed Oxon

### Response to the OxLEP public consultation on the SEP Refresh

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

The text from Nigel Tipple (OxLEP Chief Executive) in the SEP foreword which states:- "Finally, whilst we want economic growth, this must not be at any cost. But if there is any place in the UK that can balance the need to grow and develop whilst protecting and enhancing the assets that we value most, it is Oxfordshire!"<sup>1</sup> is welcome. It clearly outlines what should be the primacy of protecting our environment over growth at all costs. You would expect then, that this principal would be reflected throughout the document.

However, the SEP that follows, fails to identify any priorities or solid OxLEP commitments that will ensure that this is the case. OxLEP protests<sup>2</sup> that the housing and job growth numbers / forecasts are not its responsibility. The absence of any consultation on the original SEP and the very narrow confines of this consultation prevent the public from expressing fully their grave reservations over the overall growth agenda of which the SEP is an instrumental part.

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<sup>1</sup> SEP Consultation Draft P4

<sup>2</sup> See OxLEP Strategic Economic Plan Frequently Asked Questions on its website

## Issues of concern:-

- OxLEP identifies that the refresh should be informed in light of ongoing global economic uncertainty. However, instead of taking the opportunity to reconsider the total job targets or the benefits of introducing periodic reassessment of them (preventing inappropriate development which requires release of large tracts of green field and Green Belt land across the county that then fails, due to ongoing global recession) they perpetuate an aggressive growth strategy that threatens the environment valued by current residents.
- The SEP identifies that Oxfordshire is approaching full employment<sup>3</sup>. It also identifies that the population aged between 20 and 64 is set to decline through to 2037, which will provide job vacancies (despite an overall population increase of 13%)<sup>4</sup>. It therefore follows that more than the additional 85,600 jobs forecast will actually be required to be filled by non-Oxfordshire residents.
- Endorsing this approach spectacularly fails to recognise the two fundamental constraints of the Oxfordshire employment market – the lack of affordable housing and our chronic congestion / infrastructure deficit. The SEP does little to address these issues and OxLEP appear to abdicate any responsibility stating that the individual Local Authorities are responsible for Strategic Planning.<sup>5</sup>
- NNGO promotes an alternative vision for Oxfordshire:-
  - We promote “Good Growth” – growth that concentrates on providing high quality employment and housing for all sections of Oxfordshire society, including those currently unemployed or underemployed, and those suffering from social exclusion.
  - Good Growth should not rely on employees who are forced to live elsewhere due to lack of affordable housing who are at the mercy of our over-burdened travel infrastructure.
  - “Good Growth” provides an overall increase in job numbers and quality (e.g. those lauded by OxLEP such as those in the knowledge economy) and resists “Bad Growth” such as high bay warehousing and logistics centres that provide few, quality jobs whilst inflicting congestion on our infrastructure and blighting our rural landscape.<sup>6</sup>
  - Good Growth is focussed in those geographic areas that would most benefit from the added stimulus.
  - OxLEP claim that local job growth is ahead of forecast<sup>7</sup> but fails to identify any evidence of the quality of the recently created jobs. Concerns that many of these jobs are part time, short term contracts or zero hours contracts have not been answered.

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<sup>3</sup> SEP Consultation Draft P10

<sup>4</sup> SEP Consultation P17

<sup>5</sup> See OxLEP SEP FAQ's available on their website

<sup>6</sup> Being currently experienced in the Bicester area

- Whilst it has a limited lifespan, the SEP fails to take into account the potential effects of a possible Brexit, the ageing population and climate change on the current or future economy.

The uncertainties of the current “Brexit” debate, make the timing of this refresh and consultation questionable. This is further compounded by the refresh being constrained to a narrow agenda, set by OxLEP and without any public scrutiny of the fundamental issues of the forced growth agenda.

**Question 2 – People – do we have the right priorities and commitments in place? If not, what is missing? Please feel free to make any additional comments in the box below**

The SEP identifies that the affordability of housing is a major concern. NNGO echo this but rather than prescribe a “more of the same” approach, have a different vision of an Oxfordshire that does not buckle under the apparent demands from vested interests to create even more jobs that will only worsen the housing crisis.

NNGO support some of the stated people priorities to 2020 in the SEP. Specifically we support the skills strategy to 2020, we also believe that skills provision for the Oxfordshire population should be aligned more effectively with the needs of local employers and the benefits of persuading people, and particularly businesses and local authorities, of the benefits of “good economic growth.”

However, NNGO believes that:-

- The SEP fails to recognise the full impact of the forecast decline in the resident population aged 20-64 and inexplicably makes a reckless push for unnecessary growth, at three times the national average, which will compound our existing housing crisis.
- Unfettered growth will not secure good quality, affordable housing for rent or purchase by younger people (the right kind of houses, in the right place, for the right people (those in real need), at the right price).
- It will drive up house prices and despite promoting a rate of house building never achieved in Oxfordshire, we cannot build our way to affordable housing<sup>8</sup> as new builds only add a very small proportion of housing units to the overall housing stock and the housing market is insensitive to supply economics.

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<sup>7</sup> See OxLEP SEP FAQ's available on their website

<sup>8</sup> See [Review of Housing Supply](#), Kate Barker, 2004 and also [Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs](#) - Alan Wenban-Smith, 2014

- We, as current residents, can choose to limit overall new job growth (Oxfordshire already has virtually full employment), whilst targeting “good growth” that creates better quality jobs for current residents (and allowing for natural demographic growth) that do not threaten to overwhelm our rural county, overburden our already congested roads and destroy our environment.

Whilst OxLEP appear to have relegated their promotion of a headline extra 85,600 jobs in this SEP refresh<sup>9</sup> their plan still promotes a future that is totally reliant on securing a workforce who currently do not live locally, despite the fact that we have very near full employment and we have a chronic deficit in housing stock and infrastructure. Far from promoting a future that protects and enhances the natural, cultural and societal assets of Oxfordshire, OxLEP’s vision is a threat to the very thing that Oxfordshire residents value most. For whom is the OxLEP promoting this vision?

[Need not Greed Oxon](#) and CPRE recently commissioned a research paper from leading planning consultant Alan Wenban-Smith, to look at the real need for housing in Oxfordshire. It found that only 45,000 houses are required between now and 2031 to meet the real needs of local residents – not 100,000 as proposed by our Oxfordshire councils.<sup>10</sup>

OxLEP make much of their “ongoing commitments to deliver the programme” in the SEP. Specifically in the “people” section they state they have issued “2 project calls.” However, this section, and throughout the document, there is a complete failure to clarify OxLEP’s specific commitments as opposed to activities undertaken by its partners. The commitments given, if they can be called commitments at all are not specific, measurable, achievable, realistic or time-bound.

**Question 3 - Place – do we have the right priorities and commitments in place? If not, what is missing? Please feel free to make any additional comments in the box below**

It is impossible to comment on the existing commitments, since none are made!

The SEP acknowledges that Oxfordshire has a high quality built and natural environment and is an attractive place to live and work. Whilst it says plenty about the built environment (including its support for delivering the 100,000 houses and new business space which would be needed for the 86,500 jobs<sup>11</sup>) it provides no strategy for the protection or enhancement of the natural environment, be it the highly sensitive designated Areas of Outstanding Natural Beauty, Green Belt or green fields.

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<sup>9</sup> See the March 2014 SEP document that made it clear that this was a central aim of the plan

<sup>10</sup> See [Oxfordshire SHMA Note on Local Needs](#) - Alan Wenban-Smith, March 2016

<sup>11</sup> OxLEP SEP P22 – Place Priorities to 2020

The SEP states that it is there to support the implementation of the priorities identified in the OxLEP's Strategic Environmental and Economic Investment Plan (SEEIP). However, the SEEIP (whilst making empty statements about not taking the natural assets of the county for granted<sup>12</sup>) fails to treat the natural environment as anything other than a commercial asset which is to be exploited.

The SEEIP admits that the challenge of placing the environment at the heart of a developed economy is extremely difficult. It says that Oxfordshire could lead the way in achieving this. NNGO supports this aim, but both the SEP and the SEEIP fail to deliver any strategic commitments or priorities which would deliver on this. Promoting and enabling access to the countryside (one of the SEEIP's 5 priorities) is not the same as having a fundamental strategy of sustaining, nurturing and enhancing the natural environment underpinning every other aspect of the SEP.

NNGO believes that: -

- The SEP does not contain a single, specific and clear priority or commitment relating to the protection and enhancement of the natural assets of the county despite the hollow promises of the foreword that economic development must not be at any cost. Nor does it live up to its statement that “these [AONB and Green Belt] are the particular...characteristics of a county which is distinctive and beautiful, and which needs to be recognised, respected and conserved in these terms<sup>13</sup>.” The SEP's forced growth agenda fails to recognise, respect and conserve in any way.
- If it is to be true to the notion of development but not at any cost, and in the interests of delivering “Good Growth” the SEP must have a clear priority and commitment towards the protection and enhancement of the Green Belt and AONBs. A factual description of what a Green Belt is<sup>14</sup>, is not a policy, priority or commitment.

This section of the SEP makes much of its partners' commitments to the delivery of ambitious targets in relation to carbon emissions and the low carbon agenda. NNGO strongly supports the low carbon agenda, but the forced growth strategy inevitably conspires against this by delivering increased carbon emissions. The existing SEP document blandly asserts that countywide emissions of carbon dioxide might fall by just 32% by 2030, compared to a public commitment of 50% reduction in the Oxfordshire sustainable community strategy. This is not acceptable. In order to assist with meeting the carbon agenda (and to improve residents' quality of life and health) the growth numbers MUST be revised downwards.

- The SEP should be subject to a full Strategic Environmental Impact Assessment.<sup>15</sup>

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<sup>12</sup> OxLEP SEEIP Foreword p4

<sup>13</sup> OxLEP SEP p12

<sup>14</sup> SEP p12

- The Oxfordshire Growth Board has stated that responsibility for developing the county's Green Infrastructure Strategy now lies with OxLEP. Yet this is not stated as a priority or a commitment in this document. In fact there is no mention of it at all!
- The unreasonably high levels of growth force districts to release green field, green belt and AONB land. How can this possibly be sustainable?
- NNGO agrees that there is a crisis of affordability and availability in housing in the county. Development to meet organic growth must go somewhere, but the over-inflated housing numbers force District councils to release more land than is really necessary to house a currently non-resident workforce. What is needed are the right houses in the right place for the right price.

**Question 4 – Enterprise – do we have the right priorities and commitments in place? If not, what is missing? Please feel free to make any additional comments in the box below**

The refreshed SEP includes text that promotes all business sectors which is welcome. However, there is a disproportionate focus on the knowledge based sectors to the exclusion of the majority of less “sexy” commerce and industry (not to mention the public and voluntary sector). We believe that a more visible, inclusive approach to micro business and the rural economy is warranted and beneficial, in order to spread out the over-concentration on the knowledge spine which seems to exclude other less central parts of Oxfordshire.

Even when focussing on the knowledge industries, the refreshed SEP has little linkage with the original SEP document. The original SEP identified that Oxfordshire possess “six of the eight great technologies<sup>16</sup>” (as identified by the government) yet in this iteration this has disappeared entirely with a new, unexplained table of “Oxfordshire’s key sector positions.” This sort of unexplained change makes it difficult for any meaningful comments to be made.

We note and endorse perhaps the most clearly identifiable commitment in the entire document to continue to run the Oxfordshire Business Support (OBS).

NNGO’S concerns: -

- Commitments and priorities should be made towards development of businesses outside the Knowledge Spine and those outside the ‘Great Technologies’ in order to spread economic well-being across the county more evenly.

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<sup>15</sup> An SEA is a systematic review process, aimed at ensuring that environmental and other sustainability aspects are considered effectively in policy, plan and programme making).

<sup>16</sup> Big Data, Satellites, Energy Storage, Advanced Materials, Robotics and Autonomous Systems, Synthetic Biology Regenerative Medicine, Agri-Science

- There is no mention of the pace or phasing of business expansion – an aggressive race for growth is likely to be disruptive to communities and place an unacceptable burden on our chronically stressed infrastructure.
- There is no reference to how business expansion is going to be measured or monitored, particularly in relation to its impact on the environment.
- Research funding is often dependant of grants from central government or the EU. Both are uncertain in the current climate.

**Question 5 – Connectivity – do we have the right priorities and commitments in place? If not, what is missing? Please feel free to make any additional comments in the box below**

The 'Connectivity' theme includes all transport issues for Oxfordshire (road, rail, bus and 'Active and Healthy Travel'). It also includes broadband connectivity (where there are issues about the affordability of the final link into homes and workplaces), utilities provision and the electricity grid in Oxfordshire (which is apparently “seriously constrained threatening further growth<sup>17</sup>”). It is therefore a huge agenda which unfortunately the SEP and in particular the LEP’s priorities and ongoing commitments fail to address convincingly. There is lyrical text about driverless cars and Hydrogen Fuel Cells but there is little practical action to remedy the chronic infrastructure deficit endured by Oxfordshire’s current residents.

Even where there have been some infrastructure success, such as Oxford Parkway station, it is difficult to identify if OxLEP have had any material involvement in the project. Some would even doubt that relaying an existing rail line and opening a station and car park is much to shout about, especially as trains still do not connect to Oxford City Centre!

In a very inadequate “Snapshot of progress in delivering the objectives in the original SEP”<sup>18</sup> OxLEP identifies that it is making poor / inadequate progress with their objective to “Increase the capacity and improve the efficiency and resilience of our local transport network by reducing congestion on key highway links<sup>19</sup>.” OxLEP admits that “Evidence gathered by the County Council shows levels of congestion have increased over recent years”. This is with a very slow level of economic growth, from a base already reduced by the 2007 recession and with the benefits of several key junction improvements.

NNGO is concerned that:-

- Further significant growth is being promoted that will overwhelm the County’s existing transport infrastructure

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<sup>17</sup> OxLEP SEP Connectivity Headline assessment p31)

<sup>18</sup> See Annex A P39

<sup>19</sup> OxLEP SEP Annex A Table 1 p42

- Repeatedly promised infrastructure that was to be provided for developments which have been approved (many have been built) is nowhere to be seen. A notable example is the long-promised, but never built, Grove Rail Station.
- Other projects advertised as necessary for developments to take place have been quietly pushed onto the back burner. Thus the full A34 junction at Abingdon North was ‘required’, ‘necessary’ and ‘to be delivered early in the phasing of the development’ of over 1500 houses in the Vale of White Horse District Council’s draft Infrastructure Local Plan. But all three of these promises have been deleted – and this remarkable change is described as a ‘minor modification’ about which no further consultation will be needed.
- Road based solutions such as adding extra lanes to the whole of the A34, a huge new road linking Lodge Hill to the M40 to the South of Oxford or the mythical Oxford to Cambridge expressway might be adopted, despite their huge environmental costs and their enormous impact, not least in air quality, on nearby residents.
- OxLEP supports the notion of “good growth” but fails completely to lobby against “bad growth” including the ever-increasing warehousing and logistics industry that provides few quality jobs, blights the environment and creates disproportionate traffic congestion. If OxLEP wants to ensure sufficient capacity to meet the job forecasts and allow a further 200,000 residents to move around the County, they must bear some responsibility in preventing inappropriate growth.

One fundamental omission from the entire SEP, but particularly relevant to the Connectivity section, is a lack of recognition of the impact of air pollution from motor vehicles on local peoples’ health. There are numerous areas of Oxfordshire which exceed EU pollution thresholds. For instance, we estimate in South Oxfordshire, 59 deaths a year are hastened by air pollution. Around 50 deaths per year in the Vale of White Horse alone are hastened by Air Pollution. This compares to around 10 deaths per year from incidents on roads. If the air pollution deaths were more visible, we would focus much more attention onto them. If a coach load of people died in a crash every year, we would do something to address this, rather than compound the issue by seeking an even faster rate of growth.



**Question 6 – Does the SEP articulate clearly the roles and responsibilities of OxLEP – both in itself and in relation to other processes? Please feel free to make any additional comments in the box below.**

OxLEP is one of 39 LEPs, set up by the coalition government in 2010 to replace the Regional Development Agencies which were abolished. Since its creation it has chosen to become a Limited Company. LEPs are intended to be partnerships between local authorities and businesses. However, whilst the 6 Local Authority leaders sit on OxLEP's board, they are outnumbered by representatives from the business and voluntary sector and academia. Crucially there is no board level member directly appointed for and responsible for environmental matters which the SEP claims are vitally important. OxLEP's role, amongst other things is to decide what the priorities should be for investment in infrastructure. Whilst some matched funding is sometimes available from other sectors, the funding model for LEPs is reliant on bidding for central government and European Union funds. These fund a range of programmes and their overhead costs.

OxLEP's Chair and 3 further OxLEP reps sit as non-voting members of the Oxfordshire Growth Board. This board is intended to enable collaboration between local authorities on economic development, strategic planning and growth and contributes to the creation of the LEP Strategic Economic Plan. The Growth Board approves and monitors a range of programmes including "Growth Deals" which encompass bids to central government and the European Union for programme funding that originate from the LEP. NNGO have a range of concerns with these arrangements:-

- OxLEP is unaccountable. There is no effective mechanism to hold the company to account and the lack of any specific measurable targets within their programmes render it impossible to assess their effectiveness.
- OxLEP is undemocratic. There is no direct democratic mechanism for the public to influence or challenge the membership of the LEP.
- OxLEP lacks transparency. It meets in private. OxLEP only publishes brief minutes of meetings after their adoption at a subsequent meeting and does not make supporting documentation available. OxLEP state that they are not required by statute to publish minutes (which is correct) and that they therefore exceed the transparency requirements by publishing them at all.
- OxLEP lacks public credibility with a very low level of public awareness of its existence, role or outcomes.
- OxLEP's sole function is to attract external funding to facilitate growth and despite recognising the attractiveness of the Oxfordshire environment does little or nothing to protect and enhance this valuable asset.
- There is no regional level planning at all which would address the inappropriate focus on the South East of England. This system puts local planning authorities under pressure to build what they know is unacceptable and excessive growth into their plans, or have Ministers allow more or less any planning application, however unsuitable or damaging.

OxLEP have distanced themselves from the mechanisms that created the Strategic Housing Market Assessment (SHMA) that envisages 100,000 houses being built in Oxfordshire by 2030 and the notional jobs target that featured so frequently in the SEP published in 2014. However NNGO remain unconvinced that the LEP is not influencing and therefore partially, if not primarily accountable for the aggressive growth strategy that underpins the SEP and District Council Local Plans.

OxLEP via the SEP apparently accepts unquestioningly these disputed housing and jobs figures and uses them to pursue a “growth at all costs strategy.” There are no brakes, caveats or checkpoints identified in the figures, but this approach can be, and should be built into the SEP. Without this approach valuable land is being released for development now, without really knowing whether or not it will be needed. The SEP needs to reflect on the accepted ongoing global economic uncertainty, and assess how likely it is to meet these growth targets. Growth should be phased, to ensure delivery of housing and jobs is in tandem. We believe that OXLEP is failing in its wider responsibilities by paying insufficient attention to the detrimental effects of the growth strategy. The potentially detrimental effects of large, relentless increases in population on our health infrastructure, the education sector, our cultural and environmental assets and the overall quality of life of the current residents, is ill-served by OxLEP and this SEP.

OxLEP envisages that individual Local Councils will wish to debate and consider the SEP refresh at their Cabinet and/or Full Council Meetings. We support this approach and call upon all Local Authorities to critically assess the SEP and the reservations that many of their electors have about the growth strategy. It is also envisaged that the Growth Board will be asked to endorse the SEP and, as the only collective democratically accountable body, representing the whole of Oxfordshire as one entity, we seek that it critically assesses the SEP and its potential detrimental effects on Oxfordshire and demands changes.

NNGO believes that growth should be phased, to ensure that delivery of housing and jobs is in tandem. Measures need to be put in place to mitigate the risk of half-finished housing estates and projects that don't join up and are not supported by the necessary infrastructure. We want sustainable development focused on meeting the needs of existing residents, with growth more in line with a 10% increase in population by 2031 (based on national population projections). This means the right houses, in the right place, at the right price and supported by the right infrastructure.

**Question 7 - Please feel free to make any additional comments in the box below.**

The original SEP was never subject to any form of public consultation. This time the SEP refresh and consultation is solely at the choice of OxLEP and there can be no valid reason not to conduct a thorough process. The stated vision of the OxLEP is “Oxfordshire will be a place in which all residents – irrespective of age, gender, or ethnicity – have a real stake in determining the county's future economic narrative and contributing fully to it.” We are therefore appalled that this “refresh” of the SEP is so

narrowly focussed and fails to address the fundamental concern of many residents that Oxfordshire is pursuing an over-aggressive growth strategy that threatens the quality of their lives whilst failing to deliver housing which is affordable and meeting the undoubted needs of the residents. We want environmental and social considerations to lie at the heart of planning and decision-making, not be ignored or tacked on afterwards. This opportunity is being missed and in our view reflects a lack of a true commitment to hear the real concerns of residents.

To meet government expectation and to enable credible bids for external funding to be made, the SEP has to portray a specific sort of future that accords with central government policy. However, this leads to an “all growth is good” attitude with individual LEP’s competing between themselves for more and more exaggerated growth claims. Perhaps it is time to recognise that a headlong drive to focus further excessive growth in the South East is contrary to the benefits of the general public nationally as well as locally.

NNGO believes that:-

- The SEP consultation draft is ineffective, meaningless and incoherent. It claims that the refresh is based on "new evidence" that has come forward since the original publication but then fails to identify that evidence.
- The consultation process, and in particular the consultation questions are disingenuous, apparently designed to create the illusion of public and stakeholder involvement without addressing the overall scale of the growth agenda.
- There is a universal lack of clarity in how this document relates to the original SEP, with "priorities to 2020" and "ongoing commitments" not associated with the original SEP’s earlier "objectives" (even though they are reported on in insufficient detail in Annex A)
- The priorities have no metrics on which they can be evaluated which reduce their impact, value and public confidence levels.
- The commitments are extremely poorly worded, they do not read as commitments and are largely meaningless, failing to identify what specifically the OxLEP’s actions and responsibilities are, as opposed to those of partner organisations.
- The commitments lack any objective forms of measurement. We seek specific, measurable, achievable, realistic and time bound measurements by which the public can hold OxLEP to account

Overall the SEP "refresh" has only strengthened the view of many Oxfordshire residents that the OxLEP is an entity by way of statute alone, having no public recognition or identification, failing to provide any meaningful positive contribution to the lives of our local population. OxLEP, far from protecting the very things that the public value about Oxfordshire, is in reality, a threat to our natural, cultural and social environment.

## **WE ARE THEREFORE CALLING FOR:**

- 1. A proper assessment of the impacts of this proposed Strategic Economic Plan**
- 2. The introduction of more realistic & sustainable targets**
- 3. Followed by a full and genuine public consultation**
- 4. All led by a democratically elected and accountable body.**

Helena Whall

**on behalf of the Need not Greed Oxon coalition**



### **Planning for Real **NEED** not Speculator **GREED** in Oxfordshire**

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Need Not Greed Oxon (NNGO) is a campaign dedicated to protecting Oxfordshire's rural environment, whilst recognising the development and infrastructure needs of our residents. We are a coalition of 26 local community groups from across Oxfordshire.

**May 2016**