



Local Authority responses to consultation on SEP refresh – an overview

In its '[Report on Responses](#)' to the public consultation on the SEP Refresh, OxLEP provides a summary of comments from local authorities. It is evident from these comments, inserted below (in italics), that they are not reflective of the detailed and often critical responses provided by local authorities. A closer reading of the [Full Responses made by Local Authorities on the SEP Refresh](#) suggests that the OxLEP Report “glosses over” or potentially misrepresents some serious concerns raised by local authorities with the SEP Refresh.

While local authorities were able to make contributions at the OxLEP workshops, the very prescribed nature of the events with pre-arranged group moderators and provided questions to answer meant that for any wider comments on the SEP Refresh the main methodology was written feedback – hence the importance of these written responses.

Also, input from local authorities on the SEP Refresh was of such critical importance that they all had representatives on the SEP Refresh Steering Group. Given this, any remaining comments that have been aired in these responses must be considered significant.

This report focuses on those comments made by local authorities which touch on the issues of most concern to Need not Greed Oxon, namely: the forced economic growth strategy - including the challenges of meeting the high housing and jobs targets; the ability to provide affordable housing; the pressures facing the county's infrastructure; the potential to mitigate the impacts on the environment; and public engagement. However, the report also captures some of the more salient comments made by local authorities.

In the OxLEP Report on Responses there is a brief overview of the consultation responses from local authorities. In its summary, it states:

The district councils were all broadly supportive of the SEP and below are some key points made:

(OxLEP Report on Responses)

Cherwell District Council

Cherwell District Council felt that the SEP is a significant improvement on the 2014 version but needed further work to tighten up the Priorities to 2020, should reflect on the challenges facing Oxfordshire in terms of the SHMA figures, and that the SEP could go further in ensuring the county's natural and built environment is maintained, and to manage change in ways which produce better outcomes for local residents and businesses.

(OxLEP Report on Responses)

This succinct overview does not reflect fully the Cherwell District Council reply which also emphasised:

1. An inappropriate focus on the knowledge spine both in terms of spatially and by sector
2. The challenge for Local Authorities in meeting the SHMA targets
3. Sustaining the current level of growth across a full economic cycle
4. The challenges of providing affordable housing
5. Mitigating impact on the environment
6. Pressure on infrastructure
7. Engagement with the public

In its OxLEP SEP Refresh response, Cherwell District Council commented:

Re: Overly focussed on the "knowledge spine"

There is reference to the 'Oxfordshire Knowledge Spine' but unfortunately this concept ignores most of the County. As a result, the challenges and opportunities in towns such as Banbury, Carterton, Henley and Witney, which sit at some distance from the 'Oxfordshire Knowledge Spine', are not acknowledged. The knowledge economy itself is much wider than the defined knowledge spine, as the cutting edge engineering companies at Upper Heyford illustrate. It would be good to find a different way of describing the application of high value knowledge which is generating new gains for the County economy. The recently published report by MEPC into the High Performance Engineering Cluster contains important insights into how knowledge is acquired and applied across companies, the place of Colleges and Universities, finance secured and new ideas applied to the development of enterprise. The challenge for the OXLEP SEP is to understand how these processes apply across different economic clusters and can be harnessed to strengthen those sectors and the economy of the County as a whole.

While it is accepted that the 'Oxfordshire Knowledge Spine' concept and diagram may still have a general marketing role we do not believe that it should be driving the strategy of the SEP. It ignores the educational institutions and economic growth opportunities outside of the spine, for example in Oxfordshire's market towns such as the Space Academy at Banbury and the other Colleges across the County outside this 'spine'. Therefore, the knowledge spine concept and diagram should be replaced in the SEP with a more detailed

spatial diagram that illustrates the extensive distribution of centres of learning that provide support to driving up skills and work with industry across the County.

The focus on the 'Oxfordshire Knowledge Spine' introduces a rigid construct that leads to the SEP ignoring the fact that considerable growth is planned outside of this spine, and there will be significant infrastructure challenges in delivering growth outside of the spine and a substantial level of job creation in those areas. (Q.1)

Re: Challenges of meeting SHMA targets

The SEP could reflect further on the challenge of supporting the delivery of the scale of growth, particularly supporting the generation of new jobs and housing growth, envisaged in Oxfordshire by the SHMA and being implemented through the District Local Plans. Issues of housing affordability are rightly recognised as significant to the local economy given the near full employment. But the SEP does not acknowledge the scale of challenge in delivering the forecast numbers of dwellings to meet this growth and its role in assisting each District to secure inward investment and the growth of existing local companies. (Q1)

Given some of the concerns about the scale of growth taking place in the County which have been expressed during the preparation of the SEP, it would seem sensible to stress that the SEP aligns with the growth proposals set out in each Districts Local Plans. It does not itself add to those plans. The fact that each Local Plan has been subject to full Strategic Environmental Impact Assessment provides clear public reassurance that the growth planned has been properly considered with regard to its impact and how this impact will be mitigated. (Q3)

Re: Sustaining levels of job growth

...Whilst the SEP suggests that job growth has been relatively buoyant in the last few years this is unsurprising during a period of economic recovering. Sustaining that job growth over the long-term is a significant challenge that should be more fully recognised, especially as we can expect a recession during the 7 year economic cycle. The SEP has a role in supporting the building of resilient local economies. (Q1)

Re: Challenges in providing affordable housing

The consultation draft could usefully be strengthened by referencing the current challenge of providing affordable, though shifts in Government policy to support starter homes may have a positive effect and the development of self-build schemes in Cherwell are intended to drive down the cost of the congested road network is being addressed. The Growth Board proposal for a County-wide Infrastructure Plan merits cross reference to show that the challenges of water-stress, grid capacity and environmental impact are all being addressed. (Q1)

The refreshed SEP recognises the challenge of housing affordability in the People section, but the priorities set out do not address this issue or set out any potential interventions to support the housing market deliver. As mentioned previously the delivery of the scale of

housing envisaged by forecasts is a significant challenge. Whilst housing affordability is a particularly acute issue in Oxford City it is also an issue for the rest of the County too. (Q2)

Re: Mitigating impact on environment

Despite acknowledging the importance of the built and natural environment in Oxfordshire, the final strategy could usefully contain more detail on how it will support District and Countywide approaches to protect or enhance the environment and so mitigate the impact of economic growth. Further consideration of how the SEP might facilitate and encourage low-carbon growth would be sensible following the recent Paris Accords for tackling climate change. (Q3)

Re: Pressures on infrastructure

The SEP states that Oxfordshire is a very well connected County. Whilst this is correct in general terms, this statement does underplay the impact of congestion on connectivity. Congestion on the A34 is a particular problem for Cherwell and the County as a whole and is a significant factor in business decisions. Banbury and Bicester are set to grow substantially and have detailed commitments for new road investment set out in the Infrastructure Delivery Plan that accompanies the adopted Local Plan. This road investment will complement the rail improvements both towns have secured in recent years. Ensuring the SEP aligns with the Local Transport Plan for Oxfordshire is important, as well as taking account of the Highways Agencies Route Based Strategies which indicate a series of national priorities to be addressed within the County. (Q5)

Re: Engagement with public

It would be sensible to plan for the SEP to continue the engagement with the wider business community and publics of Oxfordshire. While there are clearly challenges with the commitment to securing the scale of growth identified in the Local Plans for each District and the support that the SEP provides to those plans, public engagement in the debate on the future of the County is vital. (Q6)

Oxford City District Council

Oxford City Council considered that the SEP Refresh structure needed recasting and the language improved, and needs to be credible to its principal audience – the business community and government.

(OxLEP Report on Responses)

Oxford City Council did not submit a written response to the OxLEP SEP Refresh, so it is not possible to ascertain the accuracy of the OxLEP summary in this instance.

Oxfordshire County Council

Oxfordshire County Council recognises the SEP as an influential tool and felt that it

could draw out the actions in the SEEIP, that it could possibly look beyond 2030, say more about Community Employment Plans and be more explicit that infrastructure planning, funding and delivery is a priority of the SEP in itself.

(OxLEP Report on Responses)

This succinct overview does not reflect fully the Oxfordshire County Council reply which also emphasised:

1. Mitigating impact on the environment
2. Pressure on infrastructure
3. Role of the LEP in delivering outcomes

In its OxLEP SEP Refresh response, Oxfordshire County Council commented:

Re: Mitigating impact on environment

For example, we welcome specific actions such as support for an energy masterplan for Oxfordshire but would encourage other specific approaches to be detailed to illustrate both sustainability and inclusivity. For example, it would be useful to draw out major actions agreed within the SEEIP such as the development of the proposed Sustainability and Environment Sub-Group and a new central environmental investment fund. Equally, we would highlight the role and importance of business in driving forward innovation in sustainability and encourage the SEP to address the role of the LEP in encouraging business to fully understand and mitigate their impact on the natural environment, exploiting opportunities available within the knowledge economy and new approaches such as the circular economy and natural capital accounting. (Para.5)

We agree that the particular spatial characteristics of Oxfordshire including and especially its environmental assets need to be protected. The County Council also maintains that a strong and defensible greenbelt must continue to form an important element of planning policy. However, it should be recognised that the greenbelt in its current form may not offer the best long term and sustainable route to achieving this goal and that to achieve coherent development in the knowledge spine that enhances the environmental position overall, the specific boundaries of the greenbelt may need to change. (p12) (Para.9)

Any change in this area is for local planning processes but as with housing completions, we would caution that the SEP should not give the impression that development particularly of the knowledge spine can be achieved without impact on the environment and the greenbelt, albeit in our opinion an ultimately positive one, if planned and delivered well. (Para.10)

Further, in May 2016, the Growth Board agreed a brief for the development of a new strategy to bring together infrastructure priorities into a single overarching Oxfordshire

Infrastructure Strategy which incorporates green infrastructure. Reflecting the central position of this work with respect to delivery of the SEP, either under Place or Connectivity, there should be a priority bullet which states: “Delivery by the Oxfordshire authorities of an Oxfordshire Infrastructure Strategy by Spring 2017.” (Para.13)

We agree that Oxfordshire is facing significant environmental resource constraints. (p22) However, we would emphasise that there are also considerable opportunities for businesses in resource management, including the circular economy, energy and broader sustainability sectors. Oxfordshire is well placed to drive innovation in these sectors, leading to new jobs and financial savings, as well as potentially tackling some of these key sustainability issues. (Para.15)

Re: Pressures on infrastructure

The delivery of the infrastructure that supports and drives growth is a key platform and ambition of the SEP. We would therefore be more explicit that infrastructure planning, funding and delivery is a priority of the SEP in itself and not as a subsidiary example within the first priority stated. (p23) (Para.12)

We very much support the point made under “sustainability” (p25) that “Innovative place...plans simultaneously for both jobs and housing growth – and puts in place the infrastructure required for both.” We feel that this point is fundamental to the purpose of the SEP and would encourage that it be reiterated with a higher status within the Place and People sections and the overall introduction. (Para.14)

We agree that further improvements to increase road and rail capacity are required. However, we would also note here and within the priorities section that congestion problems will also be relieved by getting better use out of existing road capacity through use of innovation technology and by encouraging change to more sustainable travel modes – see also note on Smart Oxford above. (p30) (Para.19)

Re: Role of the LEP in delivering outcomes

At the conclusion of each programme section, a set of priorities is listed. It would be helpful for partner and public understanding to state who is responsible for delivery and for the more tangible ambitions, when delivery is expected. Where the expectation is that the LEP itself jointly owns the priority we should consider in each case whether this is a realistic given the programme infrastructure in place. (Para.21)

South Oxfordshire and Vale of White Horse District Councils (combined response)

South and Vale District Councils consider that the SEP is too Oxford-centric, needs to contain more evidence and data to back its claims, the Connectivity theme is too heavily skewed

towards physical infrastructure and would like the SEP to refer to the importance of suitable business accommodation.

(OxLEP Report on Responses)

This succinct overview does not reflect fully the combined response from the South Oxfordshire and Vale of White Horse District Councils which also emphasised:

1. Employment growth, pressures on infrastructure and impact on environment
2. Challenges in providing affordable housing
3. Recognition of need for further liaison with business partners

In its OxLEP SEP Refresh response, South Oxfordshire and the Vale of White Horse District Council commented:

Re: Employment growth, pressures on infrastructure and impact on environment

As there are three identified hubs in Oxfordshire, Bicester, Oxford and Science Vale, we would like to see equal weight given to these and a recognition that if employment growth were to be spread more around the county then the pressures on the roads, on Oxford itself and the green belt, would be greatly reduced. (General comments)

Re: Challenges in providing affordable housing

Paragraph three on page 17 advises that Oxford is the most unaffordable city and that Oxford's housing is now the most unaffordable housing in the country. The ratio of house prices to incomes has always been higher in South Oxfordshire than in Oxford city and remains so. Affordability is, as noted, a major issue across Oxfordshire. It would be wrong to infer that the problem is most acute in Oxford. (Specific comments)

Re: Recognition of need for further liaison with business partners*

We recognise that extensive revisions to the SEP require time and input from all partners and that this may cause some delay to the publication date. As there is no external deadline for this document we would prefer to take more time to ensure it captures the issues identified above. Partners, particularly business partners, may be able to provide additional insight and data to strengthen the plan and such increased involvement could ensure a great degree of ownership of the challenges and the means of addressing these. (Specific comments)

*The response rate to the consultation from the business community was very poor. There were only four responses from businesses, leading OxLEP to conclude this was 'a concern'. (Report on Responses)

West Oxfordshire District Council

West Oxfordshire DC considered that the SEP was too focussed on the Knowledge Spine, could tap into the military presence, and should not put forward the idea of a county-wide Design Guide.

(OxLEP Report on Responses)

This succinct overview does not reflect fully the West Oxfordshire District Council reply which also emphasised:

1. Challenges of meeting SHMA targets
2. Sustaining levels of job growth
3. Challenges in providing affordable housing
4. Mitigating impact on environment
5. Pressures on infrastructure

In its OxLEP SEP Refresh response, the West Oxfordshire District Council commented:

Re: Challenges of meeting SHMA targets

The SEP does not reflect on the challenge of delivering the scale of growth, particularly housing growth, envisaged in Oxfordshire by Local Plans and by the SHMA. Issues of housing affordability are rightly recognised as significant to the local economy given the near full employment. But the SEP does not acknowledge the scale of challenge in delivering the forecast numbers of dwellings to address this particularly when the past 'backlog' of housing delivery across Oxfordshire since 2011 is factored in. A focus on the 'Oxfordshire Knowledge Spine' ignores the fact that considerable growth is planned outside of this spine, and there will be significant infrastructure challenges in delivering growth outside of the spine. (Q1)

Re: Sustaining levels of job growth

The housing need figures identified in the SHMA (100,060 dwellings 2011 to 2031), are significantly higher than the level of housing needed to support the Committed Economic Growth scenario (85,600 dwellings 2011 to 2031). This means that future employment growth will need to exceed that envisaged in the Committed Economic Growth scenario if there is to be a balance between jobs and homes. This challenge should be recognised in the SEP. Whilst the SEP suggests that job growth has been relatively buoyant in the last couple of years this is to be expected during a period of economic recovering. Sustaining that job growth over the long-term is a significant challenge that should be more fully recognised. (Q1)

Currently the Growth Board is leading work on how to address Oxford City's unmet housing need. This will have a significant impact on surrounding rural districts. Allocations to meet

these needs are likely to be strategic in nature and may well create significant economic opportunities which could help address the challenge above. (Q1)

Re: Challenges in providing affordable housing

The refreshed SEP recognises the challenge of housing affordability in the People section, but the priorities set out do not address this issue or set out any potential interventions. As mentioned previously the delivery of the scale of housing envisaged by forecasts is a significant challenge. Whilst housing affordability is a particularly acute issue in Oxford City it is also an issue for the rest of the County. (Q2)

Re: Mitigating impact on environment

Support the intention of the SEP to ensure that the high quality of Oxfordshire's built and rural environments is maintained, and to manage change in ways which produce better outcomes for local residents and businesses. (Q3)

The West Oxfordshire Economic Snapshot identified some key priority themes that we would like to see reflected in the SEP. We would like to see Carterton identified as a priority area for economic regeneration and environmental enhancement. (Q3)

Re: Pressures on infrastructure

The SEP states that Oxfordshire is a very well connected county. Whilst this may be correct in general terms this statement does underplay the impact of congestion on connectivity. Congestion on the A40 is a particular problem for West Oxfordshire and is a significant factor in business decisions. The West Oxfordshire Economic Snapshot infrastructure identifies that we need to build a case for the A40 as an important investment corridor in order to deliver future growth. (Q5)

Further information should be included in the SEP to outline the various growth corridors around Oxfordshire and to highlight key infrastructure proposals. The plan that has been included is a start but it may be better to translate this into a diagrammatic form and include some narrative explaining the scale of opportunities and constraints on the corridors. (Q5)

Conclusions

Examining the above collectively it is clear that important aspects of the local authority responses that were not emphasised in the OxLEP summary report include:

1. An inappropriate focus on the knowledge spine, both spatially and by sector
2. The challenge for local authorities in meeting the SHMA targets
3. The challenge of sustaining the current level of growth across a full economic cycle*

4. The challenges of providing affordable housing
5. The challenges of addressing pressures on infrastructure; and
6. The need for mitigating impact on the environment

* Brexit implications on job growth do not feature in the current version of the SEP (a commitment in the report merely says “The outcome of the EU Referendum will be included in the final version of the SEP.”)

Need not Greed Oxfordshire

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