Strategic Economic Plan – Consultation Draft

Report on Responses

Introduction

1. The consultation draft of the refreshed [Strategic Economic Plan 2016](link) (SEP) was prepared during the spring through a highly inclusive process. It was informed by three public workshops and bilateral discussions with the local authorities and other key stakeholders, as well as by a review of evidence. It was also shaped by a large Steering Group and – under its direction – it attempted to reconcile and accommodate wide-ranging early inputs.

2. The consultation period on the draft of the refreshed Strategic Economic Plan has recently drawn to a close. In total, 262 sets of comments have been received and OxLEP would like to thank all of those who took the time to make comments. Many of the responses have alluded to the issues surrounding the relationship between the SEP/LEP and local plan-making processes. In addition, many observations were made in relation to the scale of planned growth.

3. Of the 262 responses, 34 were made by organisations (see annex 1), with the remainder from individuals, the vast majority of whom support the stance offered by the CPRE and Need Not Greed Oxfordshire, namely that the LEP is:

- an unaccountable non-elected body
- aggressively driving growth
- responsible for unrealistic and unachievable housing and jobs figures contained in the SHMA
- heavily influencing the Local Plan process which will result in new development that will destroy Oxfordshire's environment and communities.

4. The key ask of many of the respondents is that the SHMA figures for housing and jobs are lowered, and that the SEP should be prepared by an elected body and subject to a Strategic Environmental Assessment.

5. Consultation responses from the business community have been less in evidence – both in terms of business representative organisations and individual firms. Given that the focus of the SEP is the economy and the process of wealth creation in Oxfordshire, this is a concern.

Publicising the Consultation

6. The consultation was publicised as widely as resources would allow. We produced and distributed 10,000 leaflets to parish and town councils as well as libraries. We asked the parish and town councils to further distribute the leaflets amongst the businesses and homes in their areas and also to display in public places including village halls, post offices, shops, play centres and pubs. The leaflets were also available at our partners locations including council offices, innovation centres etc.

7. We undertook a wide reaching social media advertising campaign on Facebook, LinkedIn and Twitter in addition to our general social media activity to almost 4,000 Twitter followers and there have been continuous tweets throughout the consultation period. Our messages have also been distributed through our local authority, government and business partners and followers.

8. Our social media advertising campaign statistics show that we reached:

- 70,508 via Facebook
- 45, 152 via LinkedIn
- 30,865 via Twitter

9. Two mailshots were sent to our 2000 + mailing list – one at the beginning of the campaign and again in the final week of the consultation period as a reminder. The mailshot was also distributed through our partner networks including the Oxfordshire Town Chamber Network and their 53 networks and events groups across Oxfordshire with a reach of 6500 plus members and businesses.

10. An advertisement was placed in Taylor Newspapers with a distribution of over 24,000 copies and a geographical area of Abingdon, Bicester, Didcot, Wallingford, Wantage and Witney is covered. In addition, we have undertaken radio interviews with BBC Radio Oxford and Jack FM. The Oxford Mail and Times and Taylor Newspapers have covered the SEP on several occasions.

11. Figures from Google Analytics show that between 21 April to 27 May, 5,621 people visited the LEP website, of which 62% were new visitors. In the previous five weeks (from 17 March to 21 April) the number of visitors was 3,386, meaning that the number of visitors increased by 60% during the consultation period. This suggests that whilst we may have reached many people and organisations, we did not get the balance of responses we were expecting.

The consultation results

12. A detailed breakdown of the comments received is at Annex 2. Set out below are some key headlines:

Characteristics, priorities, challenges and opportunities

- 39 (15%) of respondents felt that the priorities and commitments should be SMART and capable of being monitored over time; that more analysis of the local economy could be included; and that the SEP should mention the outcome of the EU Referendum
- 32 (12%) said that the SEP does not articulate the challenges and how they will be overcome; needs to respond to local, national and global change and does not adequately describe Oxfordshire's unique character
- However, 19 (7%) of respondents thought that the SEP captured and described well the characteristics, priorities, challenges and opportunities.

OxLEP's roles and responsibilities

- 138 (53%) considered the SMHA figures for housing and job creation up to 2031 unrealistic and unachievable and considered that the SEP refresh was an opportunity to lower these figures and to address local need.
- 112 respondents (43%) made comments relating to the undemocratic nature of the LEP and questioned why it is responsible for writing the SEP.
- 58 (22%) considered the consultation inadequate
- 33 (13%) respondents noted that there is confusion about the LEP and its relationship with the Oxfordshire Growth Board and local authorities, especially around planning powers, and the possible impacts of devolution and the referendum.
- 14 (5%) meanwhile considered that the SEP clearly explained its role and responsibilities, and are in support of what the SEP is attempting to achieve

Key sectors and employment (People/Enterprise)

- 70 (27%) respondents thought that a greater diversity of employment should be encouraged so more of the existing population benefit, including in rural areas and market towns not in the Knowledge Spine; and that it should pay attention to sectors other than Science, Technology, Engineering & Maths (STEM)
- 18 (7%) of respondents felt that the SEP should have a focus on the lower paid end of the local economy, and those who are not in employment, including older people.
- 6 (2%) felt the SEP recognised the inequalities issue, and support the activities to tackle social exclusion that is outlined in the SEP
- 18 (7%) thought the SEP should say more about training and apprenticeships.

Sustainability, social and environmental impacts (Place)

- 191 (73%) are concerned about the level of growth 'proposed' by the SHMA and that its impact on the environment (including air quality / flooding / climate change) and

quality of life has not been considered. Many called for the SEP to be subject to a Strategic Environmental Assessment.

- 6 (2%) were more positive and alluded for the need to plan and deliver the growth well
- 11 (4%) said that the priorities in the SEEIP need to be delivered and that the principles should be embedded at the highest levels of strategy and plan making

Planning for infrastructure and housing (Place/Connectivity)

- 119 (45%) respondents asked how the SEP could be properly assessed without knowing what infrastructure is required to support it, and also expressed concerns about the mismatch between new housing development and the infrastructure generally.
- 107 (41%) felt that the SEP does not address the housing needs of the existing population.
- 13 (5%) made comments about broadband
- 13 (5%) said that the SEP should recognise the key role that rural areas and market towns play in the Oxfordshire economy.
- 12 respondents want the SEP to allude to local transport concerns including the need for a transport interchange in central Oxford, new train stations and a focus on sustainable active travel (waling/cycling)
- We received a good number (9) of comments about the need to make more in the SEP about the importance of regional transport links, including supporting a new Thames crossing at Reading.

Comments from the local authorities, Growth Board and the OxLEP Board

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

- 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.
- 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.
- 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.

- 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
- 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.

14. The SEP refresh was considered at both the OxLEP Board and the Oxfordshire Growth Board and the following observations made:

- A stronger narrative is needed to emphasise how the economy has changed over the last decade, but with a particular focus on the last few years (since the original SEP was produced), and the priorities for the future.

- The need for a stronger focus on the particular purpose of the SEP, and in turn, define the audience. This means in practice a clear aim to enable Oxfordshire businesses to grow and securing increased employment and GVA.

- Particular attention to be paid to the county's key sectors as identified, in the main, through the sector propositions, the cultural/heritage (through the Creative Cultural Heritage Tourism Investment Plan – CCHTIP to be launched on 11 July) and environment sectors (Strategic Environmental Economic Investment Plan), but also on our programme around social inclusion and access to employment.

- The narrative needs to change slightly and the number (and length) of illustrative "boxes" need to be lessened.

Outcomes of the consultation

15. Annex 2 shows our responses to the comments received. These comments and our responses in return, were considered and agreed by the SEP Refresh Steering Group at a meeting on 15 June.

Next steps

16. During the summer months we will progress with developing the SEP further in the light of the comments received where it is possible to do so. We may contact stakeholders to clarify inputs where needed.

Annex 1 – Organisations who responded to the SEP Refresh Consultation

- Ace Training & Consultancy
- Alliance of Environmental Groups, including: Berks, Bucks & Oxon Wildlife Trust, Chilterns Conservation Board, Cotswolds Conservation Board, CPRE Oxfordshire, Earth Trust, North Wessex Down AONB Partnership, Oxford Friends of the Earth, RSPB, South Oxfordshire Sustainability, TOE2, Wild Oxfordshire, Wychwood Project
- Bicester Vision
- Bodicote Parish Council
- Bourton Parish Council
- Cherwell District Council
- Chilterns AONB Conservation Board
- CPRE Oxfordshire
- Deddington Development Watch
- Drayton St Leonard Parish Council
- Eynsham Society
- Harwell Bicycle Users
- Letcombe Regis Parish Council
- Need Not Greed Oxfordshire
- Oxford City Council
- Oxford Civic Society
- Oxford Green Belt Network
- Oxford Preservation Trust
- Oxfordshire County Council
- Oxfordshire Cycling Network
- Oxfordshire Friends of the Earth
- South Oxfordshire District Council
- South Oxfordshire Sustainability Alliance
- Sunningwell Parish Against Damage to the Environment (SPADE)
- Sunningwell Parish Council
- Thame Town Council
- Thames Valley Berkshire LEP
- Vale of the White Horse District Council
- Wantage and Grove Campaign Group
- Waterstock Parish Meeting
- Watlington Parish Council
- West Oxfordshire District Council
- West Oxfordshire Monorail
- Woodstock Town Council

Characteristics, priorities, challenges and opportunities

	Comments	Number of respondents	OxLEP comments
	Nature of the Priorities to 2020 and the Commitments		
1	- The priorities and commitments are not SMART, and it is not clear what the LEP will actually do, or what partners will do. - How will the priorities and commitments be monitored? - Better the SEP is called a 'strategy' rather than an 'plan' if it is to be aspirational rather than contain time-bound targets - Much of delivery will be undertaken by others. LEP needs more 'influencers' - Need to establish a baseline so SEP can be monitored - SEP does not set any priorities or commitments for the environment/Place theme The SEP needs a section that analysed hard data to give the reader a greater understanding of the Oxfordshire economy - Commitments are woolly and priorities meaningless and have no metrics/evidence based concrete proposals - No proper analysis of the economy – shallow document - There is no mention about what happens if we come out of the EU	39	The Priorities to 2020 will be developed further (especially in terms of the Place theme), made SMART and will form the basis for future monitoring. The SEP will set out what Priorities OxLEP will **deliver** directly, what it will **enable** and where it will **influence/support/lobby** We will include a greater analysis of the Oxfordshire economy The outcome of the EU Referendum

	• Perhaps need to extend timeframe of SEP refresh to take EU referendum into account • Key characteristics do not give information on number of jobs created since the original SEP, does not make clear the high employment rate. • The characteristics show clearly that the 5,000 per annum housing target is unachievable • The SEP and associated delivery plans need to contain clear milestones. However, reflecting the delivery milestones of some major planned and potential strategic infrastructure improvements there may be a need to look at longer term ambitions up to 2040, in line with the emerging Oxfordshire Infrastructure Strategy being prepared by the Growth Board and Oxfordshire County Council • Periodic reassessment of the SEP should be clearly stated with a commitment to reassess the SEPs aspirations in light of prevailing economic conditions • SEP needs a clear statement about what it is aiming for after 2020 • The map on page 32 shows no detail and therefore no commitments		will be included in the final version of the SEP We will include a section on achievements since 2014 We will state in the SEP where Commitments may have a timeframe beyond 2030. We will include a commitment to review the SEP regularly in the light of changes to the economy. We will revisit the map.
The extent to which the challenges facing Oxfordshire are identified and captured			
2	• The characteristics, challenges and objectives are well described • SEP is an very good/excellent document • The SEP refresh is a significant improvement on the 2014 SEP • The commitments and priorities seems right • SEP contains a lot of really useful information • Challenges and opportunities are well described • The SEP grasps the challenged faced	51	The SEP will acknowledge the challenges, especially around the key issues around the lack of affordable housing and transport congestion. We will firm up the narrative of the SEP, especially in relation to what

• The SEP correctly recognises the rural nature of the county, with challenges of over-development and the stresses that come from excessive housebuilding. • Innovation-led growth and research and development opportunities are clearly articulated in the SEP • The SEP paints an accurate picture of the current state of the area but the forward look is predicated on a continuation of trends that are not healthy or certain to come about. Need caveat around the ambitions • Reinstatement of the Vision is welcomed and the SEP refresh should emphasise that we are some way towards realising the Vision. • Good to see that the SEP mentions the needs of rural communities as well as the potential of Oxford and its Universities • SEP does not articulate the challenges and how they will be overcome • All gloss and no substance • The SEP does not reflect on the challenge of delivering the scale of growth envisaged by the SHMA, taking into account the backlog of delivery across Oxfordshire • It is unclear what the SEP is doing for ordinary people already living and working in Oxfordshire who face unaffordable housing and congestion • The SEP does not identify well enough the issues and barriers which need to be overcome which the strategy can support to reach objectives • Imaginative solutions to housing are needed that minimise the impact on the rural environment. These are not described. • Does not address the two fundamental constraints – lack of affordable housing and congestion	OxLEP **delivers, enables** and **influences.** This should help the reader understand the role of OxLEP in relation to the local planning authorities' statutory duties in seeking to balance the environmental, social and economic impacts of development proposals through the Local Plan process. It is important to note that the Oxfordshire economy has grown rapidly over the last few years – it has not faltered, as suggested in the comments (see response under "OxLEP's roles and responsibilities", comment 1, below). We will state clearly our ambitions for social inclusion throughout Oxfordshire. We will provide clear evidence of our economic strengths in the research and innovation sectors.

113

- The ambitions will be difficult to realise without substantial improvements to transport infrastructure and housing
- The issues in People, Place and Connectivity should be resolved before there is any significant further expansion in employment in Oxfordshire
- SEP 2016 have failed to refresh the fundamental platforms of the 2014 SEP – no acknowledgment that the economy has faltered
- SEP needs to respond to local, national and global change and uncertainty
- The SEP shows an arrogant disregard for the strengths of the county
- The SEP is a poor document,
- Language in the SEP is abstract, meaningless, turgid and repetitive
- LEP is reliant on central government funding and funding from the EU – ignores the need for holistic planning
- SEP focus too narrow
- SEP will magnify the differences in Oxfordshire and be a force for unrest and disharmony
- Real vision and thinking outside the box are needed but SEP fails
- SEP does not adequately describe rural/environmental assets i.e. waterways
- SEP does not mention employment and social issues faced in Cherwell
- The potential of the Oxfordshire economy to contribute to the national economy is not highlighted.
- The SEP does not showcase the unique character of Oxfordshire
- The SEP does not mention agriculture
- There is no new evidence in the SEP
- Does not provide evidence to support claims about scale of innovation,

114

	research excellence etc.		
	Other comments		
3	• SEP is too Oxford centric • Science Vale continues to strengthen as an independent, sustainable centre and Culham, Howbery Park etc need recognition. • SEP needs to mention the role of town and parish councils in relation to economic growth	4	The SEP will acknowledge the areas outside Oxford City and the Knowledge Spine, and describe the key roles played by market towns and rural areas in the Oxfordshire economy.
4	• The SEP presents a positive view of the economy and the progress but to the man in the street it is difficult to read and relate to. Services have clearly declined even with an increase in population in towns such as Wantage • Ordinary people will not understand the SEP and its implications • Lack of transparency around the relationship between the SEP refresh and the original SEP, including the targets	3	The principal audience for the SEP is government and business. Government is the audience because the SEP provides the framework for a lot of the funding for infrastructure, skills, etc that Oxfordshire receives. Business is the audience because the SEP is intended to support the continued growth of local firms as well as more new start-ups. However, we will produce a summary that will be a more appropriate read for the general public
5	• Challenge is how to deliver not 'growth' but 'sustainable development' so as to maintain quality of life	1	See our response to comment 2
6	• The biggest challenge is to get wider understanding of the balance that needs to be struck between influential, mainly older elements of the rural population, and the proponents of growth who are mainly	1	See our response to comment 2

115

		younger, urban dwellers		
7	•	The LEP's priority should be to address the needs of Oxfordshire residents who don't need new jobs but improved services	1	See our response to comment 2
8	•	We are not applying for as much funding as we should	1	The SEP provides a framework for decisions by Government about funding. More detailed plans such as the SEEIP and CCHTIP are intended to help organisations to access funding from government and European funding
9	•	Priority should be the restoration of public services through ending austerity policies	1	This is not in the scope of the SEP
10	•	In identifying the challenges to delivering the SEP (p10), need to highlight the disparity between the delivery of houses anticipated in the SHMA (~5,000 completions PA) and the real delivery that has been achieved in recent times as noted in the infographic on page 11.	1	We will highlight this issue in the final version of the SEP. However, it is important to note that the rate of housing delivery is increasing
11	•	The differing aims and objectives of each local planning authority bordering the Oxford Fringe is not an aid to an overall strategy	1	See our response to comment 2
12	•	There is a gap between what planners understand by the Oxfordshire economy, and the what the public understands	1	Noted
13	•	SEP should draw on the work done for the Cherwell Local Plan to help refine it	1	We will continue to work with our public sector partners to refine the SEP
14	•	SEP should be leading the way by pioneering a steady-state economy	1	The purpose of LEPs is to support economic growth in their local area
15	•	The draft well describes the spatial context and the Oxford *functional*	1	We will revisit the map for this

116

	economic area. Given that the Knowledge Spine is a very relevant spatial reference it would make sense in this section to link the economic function and status of Oxford to the Knowledge Spine and describe the quantum of jobs, homes and connectivity and accessibility investment planned in the corridor.		section.
16	• The preparation by the Oxfordshire Growth Board and Oxfordshire County Council of an Oxfordshire Infrastructure Strategy should be identified as a priority in the SEP	1	Agreed – we will allude to the work of the Growth Board in the SEP
17	• 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.	1	Agreed
18	• Smart Oxford is a core partnership programme and giving it support should be listed as a priority in this section. • Note within the priorities and Connectivity sections 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 Smart Oxford.	1	Agreed
19	• In terms of overall presentation and context: - At the conclusion of each programme section, a set of priorities is listed. It would be helpful for partner and public understanding to state	1	Agreed

117

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 realistic given the programme infrastructure in place.

- Overall the refreshed SEP is a more strategic document. However, it would be helpful in that context to review how the SEP signposts where detail for specific growth centres such as Bicester, Banbury, etc. can be found.

- The SEP should be a usable and used document and would encourage the development of an interactive pdf or "micro-site" version that links together the SEP with the local and national plans and policies it relates to, helping to contextualise the document and keep it relevant into the future.

- Annex C which describes the relationship between the SEP and development planning and fig. 6 which shows OxLEP in relationship to its principle partners is welcomed.

- To further set the SEP in context and to aid understanding, it would be helpful to include a simplified graphic early in the document setting out the relationship between the SEP and its subsidiary documents and the strategies and plan that drive it. This would also allow an early commentary on the relationship between the LEP and the Growth Board.

![OxLEP logo - driving economic growth]

OxLEP's roles and responsibilities

	Comments	Number of reponses	OxLEP comments
			Oxfordshire Strategic Housing Market Assessment
1	• Object as the SEP is based on ludicrously optimistic growth numbers for housing and jobs. Figures have been dreamt up/plucked from the air and not up to debate. They are based on errors and assumptions that have not been subject to challenge. Forecasted working age populations are declining and LEP does not take this into account. • Numbers are over aggressive and will relate into inappropriate Local Plans • Rate of proposed housebuilding is unachievable and fails Oxfordshire residents and rural nature of the county • Numbers including population projections need to be revisited • Rights of fictional population have more rights than the present population • Targets will cause mass immigration and will increase population by 38% in a generation • Growth is all about greed and profits for a few. • Growth targets are obsessive, or artificially enforced, unrealistic • Need for 45,000 new homes as articulated by Need Not Greed Oxfordshire • Global uncertainty should be catalyst to reconsider targets • SEP needs to introduce more realistic and sustainable targets, followed by a full public consultation led by a democratically elected and accountable body	138	This issue was addressed in the SEP Frequently Asked Questions. As we explained, OxLEP are not the "owners" of the overall housing growth figures contained in the Strategic Housing Market assessment (SHMA), nor on its own the job growth figure that came out of the **Oxfordshire Economic Forecasting Report.** Vale of the White Horse DC on behalf of all the City and Districts Councils commissioned both the SHMA and the economic forecasting report to underpin the SHMA, which was produced in accordance with national government guidelines. The economic forecasting report

• The county already has full employment and an aging population. • LEP takes no responsibility for SHMA targets – vicious circle • There is full employment already and we have a successful county with universities, heritage, tourism, research etc, so why more growth? • Why is the county all out to force the SEP in such a truncated timeframe – growth should be organic and communities should be asked about their vision of growth • LEP should be campaigning for more growth across the UK where unemployment is high, i.e. the North West/East • Need for a UK perspective on housing/job growth • SHMA housing need figures are higher than level of need to support the Committed Economic Growth scenario, leading to an imbalance between housing/jobs – SEP needs to recognise this. Work on Oxford's unmet needs may help address this. • Oxfordshire should not be ruined by an attempt to give a better life to those who should be encouraged to improve conditions in their own communities		was also intended for the LEP to use as evidence of job growth to include in the first SEP. The LEP/SEP is informed by the <u>outcome</u> from the SHMA process, but has not <u>generated</u> the numbers. We understand that revised guidance on how to undertake a Strategic Housing Market Assessment may be published later in 2016. It will be up to the Oxfordshire Growth Board to decide if and when it is appropriate to update the Oxfordshire SHMA in the light of this new guidance. The jobs figures inform the provision of land and premises, infrastructure requirements, and the need for housing (although household forecasts are the primary influence on housing provision). The jobs figures are based on projections linked to the past and likely future performance of Oxfordshire's sectors. In fact, the expected rate of growth 2011-31 is lower than was achieved historically

120

			(1981-2011), and the rate of jobs growth over the period 2011-14 has been significantly higher than the trajectory implied by the jobs growth figure for 2011-31. Therefore although the numbers sound large, the expected scale of jobs growth 2011-31 is neither unrealistic nor aggressive.
Nature of the Oxfordshire Local Enterprise Partnership			
2	• The SEP has been developed by an unelected group/quango with vested interest in growth and does not represent the views of most of the residents of Oxfordshire. • Why is the LEP in charge of making decisions about the future of Oxfordshire? • Inappropriate that OxLEP is responsible for producing SEP which is the basis for Local Plans • LEPs have been given outrageous powers to dictate planning policy. Unethical. • Why does the LEP exist when we have county, district and parish councils to work together? • OxLEP should be abolished and all powers placed in local government • Meetings held in private so not open to scrutiny • OxLEP is unknown even to elected councillors and does not engage in a meaningful way.	112	Local areas were invited by government to form Local Enterprise Partnerships in 2011 to replace the nine Regional Development Agencies in England. The public and private sectors were asked to submit proposals for LEPs. The six Oxfordshire local authorities proposed the establishment of the LEP for Oxfordshire. OxLEP does not develop planning policy – this is the responsibility of the local planning authorities.

- There should be a wide ranging and binding democratic consultation through a referendum as to whether the SEP is acceptable - Respondents are not being given the opportunity to comment on the overall targets. - There is huge concern about the accountability of the LEP and the lack of transparency - OxLEP say that the public get their say when commenting on local plans but by that time the economic strategy has already been accepted and being promoted - Local authorities should object to the OxLEP/SEP - The LEP is an inappropriate body to carry out this work - OxLEP should be replaced - The refresh should be a full scale re-examination of the overall growth figures for Oxfordshire - Growth targets are accepted only because it is in the interest and /or to the benefit of OxLEPs commercial board members - LEP cuts across established planning system and bypasses democracy - Oxfordshire Growth Board should take responsibility for the SEP and its implementation - There is no individual in the LEP responsible for Place and the environmental agenda. - OxLEP should be a democratically elected body which takes full responsibility for its growth plan	OxLEP is a business-led partnership, and its principal wider constituents are local government and organisations like the universities (all of which are represented on its Board). The LEP is not local government but it has representatives from local government steering its work. For the LEP itself, the key priority is to work closely with businesses and to support them so that they invest in Oxfordshire and in turn can provide opportunities for local people. Supporting this process will often mean attempting to secure funding from central government (and the EU). In explaining its work, OxLEP has made considerable efforts to engage with the public. It will continue to do so within the context set out above.

The SEP Refresh Consultation			
3	• There has been insufficient publicity about the SEP. • To date the public have not been consulted • Limited consultation • Lack of consultation is a disgrace • Public not engaged in any meaningful way • Consultation not advertised/poorly publicised • Consultation period is not long enough • Not a real consultation – just a box ticking exercise • The LEP has not worked hard to consult grass roots organisations such as Parish Councils • LEP is missing out on valuable responses • The workshops and consultation were an insulting farce • Consultation should be carried out by Oxfordshire County Council • Changes were made to the SEP refresh document after publication showing a lack of understanding around the basics of public involvement • The on-line response form was not fit for purpose • Inadequate information was provided around alternative ways of responding • Inappropriate mandatory sign up for OxLEP emails in order to submit comments • There was no vision of other responses (eg local authority consultation would display all responses received) • Need comments from the younger generation • Why is OxLEP consulting now after so many planning applications are already in the pipeline?	58	We undertook a wide ranging consultation – see paragraphs 6 to 11 above.

		OxLEPs relationships with the Growth Board and local planning authorities		
4		- The roles and responsibilities of the LEP, local authorities etc are clearly explained - OxLEP is there to guide and facilitate and this comes across well in the SEP - SEP should be synchronised with the work of the Oxfordshire Growth Board, work that is now well overdue. This would allow SEP to be absorbed into strategic planning and encourage 'good growth' - The SEP will play an important role in guiding the work of the LEP and influencing Local Plans - Fully support the LEP – its framework and operating model - OxLEP could and should take a more active role in Local Plan preparations and Examinations in Public - SEP is an effective high level document but suggest there needs to be alternative versions for different audiences? - SEP should set out its role in supporting tourism alongside Experience Oxfordshire - SEP should be focussed solely on business, development and what the government thinks is best for Oxfordshire this week - There is a lot of confusion about the role of the LEP and how residents can influence the work of the Growth Board and Skills Board and how they are accountable. - There is a low level of awareness of the LEP - Inadequate explanation of rationale/scope/governance of OxLEP in the SEP - It is not clear how OxLEPs relationships with the local authorities will play out, or how its role will change, if there is a devolution settlement. - SEP should reference the unitary debate and the possibility of significant changes in governance structures in the medium term	47	We will make the role of the LEP, and its relationship to other bodies such as the Growth Board and the local authorities, clearer in the second draft of the SEP. We will also refer to the broad areas of funding and responsibility being considered for devolution

124

- The state of local authority finances and the upheaval in reorganising local government, including community planning, will move the goal posts again - The fact that the local planning authorities are on the LEP Board reinforces the impression that there is insufficient independence of the planning process from the economic growth agenda - Any claims made by OxLEP that it should not consider the social, and environmental impacts and that they are the responsibility of the local authorities is disingenuous, given that the local authorities themselves are principle members of OxLEP. - LEP is part of a complex structure meaning that few people understand the present arrangements - The local authorities have no say at all in the SEP, which are written by private consultants - More publicity around the LEP is needed - OxLEP needs to set out how it is working with other LEPS - Communications and engagement of SEP and SEEIP could be improved. - Need a delivery arm with better funding and focus on rural tourism/accessible countryside should be introduced to lead on the ambitions in the SEEIP. - Fails to provide sufficient strategic leadership for the resolutions of linked constraints of housing and infrastructure deficit. Instead OxLEP abdicates responsibility for this to individual local authorities - SEP should be debated by all local councils and at the Oxfordshire Growth Board. All should have the power to veto the SEP - LEPs are an almost Orwellian monster of private interests appointed by Whitehall to drive through the SEP over the heads of local people and their elected representatives.		

- The chances of realising the objectives remain the political and bureaucratic obstacles represented by the configuration of the councils within the county - Achievement of the Place aspirations relate to planning policy and are outside the remit of the LEP - LEP lack any public credibility and acts to attract external funding to help growth		

126

Key sectors and employment (People/Enterprise)

	Comments	Number of responses	OxLEP comments
	Sector and geographical spread		
1	• A greater diversity of employment should be encouraged so more of the existing population benefit, including in rural areas and market towns not in the Knowledge Spine. • The SEP should provide support for a range of sectors, including rural businesses, tied to local employment needs, with access to business support • Commitments and priorities should be made towards development of businesses outside the Eight Great Technologies. • Eight Great Technologies replaces by Oxfordshire key sector propositions is confusing • Skills provision for the local population should be aligned with the needs of local employers • SEP focusses on 'intellectual' side of the economy and not on wider sectors • It would be helpful for the SEP to acknowledge the multiple roles of some rural businesses, for example by adding to the priority "ensuring there is also support for enterprise not linked to the research infrastructure" an additional example: "…and by understanding and valuing the diversity and impact of rural enterprises." • Support for local businesses should be a higher priority than schemes for a world-leading economy • There is too much focus on Science Technology Engineering and Maths	70	The SEP will recognise the value of rural businesses/those outside the Knowledge Spine, and identify the range of support that the LEP provides for such businesses. However, there are two main reasons for the main focus on the Knowledge Spine: i) It includes the main concentration of economic assets in the county and the greatest opportunities for growth ii) Many of the jobs likely to be created in the Knowledge Spine are science and engineering related and are well

(STEM) and not enough on social care, construction, health and education • SEP does not recognise rural industries such as farming, forestry, countryside management etc • Little reference to how the LEP is going to improve the conversion of R&D into private sector business growth • Need to look at employment types that are doing less well. • Is LEP happy with unchanging proportion of micro businesses (employing less than 20 people) • Trend for self-employment need to be analysed • Little reference to the number of public sector jobs – need to be stripped out to give a true picture of the employment base • Equal weight needs to be given to the three growth hubs – if employment growth were to be spread more evenly it would reduce pressures on roads, green belt • Growth at all costs does not distinguish between high and low quality jobs • The SEP contains no apparent strategy for the phasing of business expansion, how such expansion will be monitored, measured and assessed in relation to the environment and residents • As most new employment will come from existing businesses, is the SEP advocating fracking as a source of employment? • There is too much about business opportunities. It is too commercial • Need to recognise the importance of the publishing sector • The SEP should include a more detailed map showing key areas within and without the Knowledge Spine • There is a lack of diversity in the types of employment available in Oxfordshire • Science and engineering should be priorities	paid. These types of job have the greatest local multiplier effects in terms of generating demand for local goods and services.

128

	• The should be more emphasis on towards the developments in the Nuclear Fusion industries out of current research projects • Need to focus on the energy sector		
Social inclusion			
2	• The Skills Strategy is supported • The activities of OxLEP to target activity for the long term unemployed is supported • Good to see a recognition of the inequalities issue • The proposals to increase the availability of suitably qualified people in Oxfordshire are reasonable and should be successful • Bicester would welcome an opportunity to shape the Skills Strategy to help the town's present and future workforce • The SEP ignores the low paid, zero hours side of the economy. • Insufficient account is taken of economic uncertainties • Greater social and economic equality and increased well-being should be a priority. Areas of deprivation and social mobility issues have been ignored. • The 'just in time' economy generates poor paid and temporary employment. • No mention of support or protection for these jobs regarding contracts, training or working conditions • Far more needs to be done for young people who are unlikely to achieve Level 2 qualifications • People on ESA and young people who have social care involvement need more attention in the SEP. • Little attention being given to people from lower socio-economic groups • Need to create a more inclusive Oxford • More focus on other sectors and jobs – farmers, carers, teachers,	24	We will include reference to social inclusion and our projects to help tackle it via our European Social Fund programme. The Oxfordshire Skills Strategy is intended to support young and disadvantaged people into jobs

	shopkeepers etc • The only jobs being created in Bicester is in low-paid retail/warehousing. Smaller shops in the town centre are closing which is terrible for Bicester. • New warehouses should be built on the army base which is rail connected • Need more cooperatives an self-employment with support for tele-working		
Training and apprenticeships			
3	• Whilst training and apprenticeships aspects are positive and supported, there is not enough focus on existing residents, including the potential of older workers • Need to retrain older people • Need to recognise the military as an economic benefit • Need more apprenticeships • Construction training and jobs needs to be a priority, especially for local young people • Needs to be a broad spread of non-skilled, semi-skills, skilled and professionals • SEP should address the crisis in social care to include key worker status of workers, recruitment and retention, social care apprenticeship scheme etc • Need high quality, high skilled jobs (including technicians) for local people • Improve skills in a way that helps the existing workforce to grow their careers and income • Need more training in engineering, IT and computer programming • Need to further educate and train young people but little investment to help small businesses do this • People move to Oxfordshire because of autism bases but what about when they become adults? Where are the schemes to help them into work? • SEP is disparaging about the over-64's	18	We will describe our work on training and apprenticeships in the final version of the SEP.

130

4	• The SEP needs a stronger emphasis on Community Employment Plans for strategic development sites	5	We will describe our on-going work on Community Employment Plans
	Other comments		
5	• The SEP needs to identify West Oxfordshire's key role in the Oxford city region, namely the Woodstock/Eynsham area. Carterton is also a key area for growth • University spin outs could be exploited outside of Oxfordshire, especially areas that have more fragile economies	2	See our response to comment 1 above
6	• Plenty of talk about housing, but not a lot on jobs – where are the new jobs coming from?	1	The SEP will explain the scale and sectors in which new jobs have been created in the last few years, and where new jobs are expected to come from in future
7	• SEP should look at how employment land / business space can be bought forward across the county – lack of it is hampering economic potential	1	Much of the infrastructure investment that has been, and will continue to be supported by the LEP, is designed to bring forward for development sites that have been allocated in Local Plans for housing or employment use
8	• Space Studio at Banbury faces an uncertain future – where will students work?	1	This is out of scope for the SEP
9	• SEP is not clear on support for small businesses	1	We will describe our work on business support
10	• There is a lack of understanding of the innovation chain.	1	Refer to the Oxfordshire Innovation Strategy

11	• There should be closer working with STFC	1	The LEP already works closely with STFC and other research organisations to support research commercialisation and more business engagement with the science and technology facilities in the county
12	• Golden Triangle not supported	1	Noted
13	• SEP should mention the Rural Productivity Plan	1	We will refer to this as appropriate
14	• People theme mentions '*persuading people of the genuine potential benefits… linked to good economic growth*' – the SEP does not explain how this will be achieved	1	We will make our Priorities and Commitments SMART
15	• Need for improvements in productivity is not mentioned • Need to compare Oxfordshire's productivity with other areas	2	Improving productivity is listed as the first priority of the SEP under the Enterprise programme area
16	• Automotive sector should be supported in Bicester	1	Automotive is one of the five key sectors that OxLEP has identified for support
17	• Network Navigator role for Bicester would be welcomed	1	Network Navigators are sector focused, and are an important initiative for the LEP
18	• Recruitment of workers from abroad may produce stress in communities. How is OxLEP going to promote integration?	1	This is out of scope for the SEP
19	• No need to retain graduates	1	Retaining graduates is an important way to ensure Oxfordshire companies can find the specialist skills they need

| 20 | • Food sector should form part of the low carbon/enterprise strands | 1 | The food sector is mentioned in the SEEIP |

133

Sustainability, social and environmental impacts (Place)

	Comments	Number of responses	OxLEP comments
	Social and environmental impacts		
1	• Support the intention of the SEP to ensure that the high quality of the built and natural environmental assets is maintained • 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). • 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. • SEP should stress that it aligns with the growth proposals in each districts' local plans and does not have to be subject to an SEA to provide reassurance to the public that the growth planned has been properly considered in terms of impact and mitigation • Recognise that the SEP is legally not subject to an SEA but LEP is encouraged to consider a voluntary approach	197	See Annex 3 below on the need to undertake a Strategic Environmental Assessment – advice from Oxfordshire County Council See Annex D of the draft SEP on the case for sustainable and inclusive economic growth

134

135	• The social and environment impacts of the SEP have not been considered. • The SEP should be subject to a full Strategic Environmental Assessment • Measures need to be put in place to mitigate half-finished housing estates that are not joined up with infrastructure • Impact of proposed growth would be irreversible • The growth plans will undermine quality of life, nature, make congestion worse and increase pressure on services and infrastructure • SEP should set out how environmental impacts will be mitigated. • Over-emphasis on financial and material over social, environmental, spiritual values • The growth proposed is unnecessary for Oxfordshire and its residents and it will damage the environment and rural nature of the county and reduce green space. The SEP should recognise this and acknowledge that avoidance and mitigation are integral to the economic development process • SEP will result in loss of villages, independent shops and culture • It will have a detrimental effect on the character of the area which will effect recruitment for existing employers. • It takes no account of the local view • Need to avoid urban sprawl • The SEP ignores impact of growth on climate change and national debt • The key environmental assets mentioned in the Forward do not flow through the following text. Need to see the impacts of the strategy on natural resources • There is a need for a more realistic county-wide growth plan that prioritises brownfield sites, takes into account the needs of existing communities and recognises the value of the environment/rural areas. The county-wide growth plan can be properly assed in terms of the social, environmental and		

136

economic impacts.
- The SEP is designed to provide for the needs of people elsewhere and ignores the real needs of local people.
- Notional job targets are leading to actual housing figures. There are no breaks, caveats or checkpoints.
- Growth should be capped to 10% of present population to take account of the actual possibilities in Oxfordshire, rather than setting high growth aspirations and then trying to fit in the housing assumed.
- Growth should be phased and focussed on the needs of existing population.
- The SEP refresh should be an opportunity to introduce lower growth targets for the county that are more realistic. Current targets are being used to justify building in the Green Belt and in Areas of Outstanding Natural Beauty.
- Cultural and amenity heritage are endangered
- The plan makes no attempt to balance the needs of the population and the environmental impacts of growth and climate change.
- Affordable housing and congestion are key constraints to any growth. SEP does not recognise this
- Need to think about 'good growth', rather than what is planned.
- New jobs should be going to areas of the country where there is empty housing
- Environmental degradation is a threat to the Oxford brand and this is not mentioned in the SWOT for 'Place'
- SEP should address the limits to growth and what these are.
- SEP should encompass health, well-being, air quality, environment, economy, social inclusion, tourism etc and show how these are all connected

• There is little commitment to the tourist industry • Air Quality Management Areas will be affected by development • Sustainability is poorly articulated • Air pollution in Oxford and the towns is already above health limits. The growth proposed would make it illegal and be contrary to the Environment Act 2005. This plan will make air quality worse. • Air pollution will increase. Need to reduce fossil fuel consumption and find more renewable energy sources. • SEP will increase air pollution, nature destruction and missed climate change targets • No commitment for a low carbon future and renewable energy • No mention of air pollution / climate change / flooding / water quality and associated health risks • Concerned that Oxfordshire is not on track to meet carbon reduction commitments • Does not mention biodiversity • Rural areas like Harwell are being concreted over • The LEP is already responsible for an 86% expansion in the population of Shrivenham, with no adequate services • Shipton-under-Wychwood is already ruined by recent housing development • Concern that Bodicote going to get more housing on the back of this plan • The SEP does not appreciate the extent to which present economic success rests of the attractiveness of the county and is put at risk by the growth proposed • SEP should set out a clear definition of 'sustainable development' which complies with the AONB Management Plan • SEP does not pay sufficient attention to the Green Belt	

137

	• Does the SEP satisfy the 2006 Natural Environment and Rural Communities Act • 'Good' growth is not defined		
**The Strategic Environmental Economic Investment Plan for Oxfordshire and the SEP**
2	• The SEP should: - Set out a clear definition of what OxLEP envisages by sustainable development and embed these principles in the SEP and every project that is developed and funded - Carry out an SEA - Make clear OxLEP's commitment to develop a Green Infrastructure Strategy - Establish the SEEIP Sustainability and Environment Sub Group - Establish the Central Environmental Investment Fund - Build on existing natural capital assets • Should not rely on the SEEIP to set out and deliver environmental, rural and tourism factors as these should be embedded at the highest level • SEEIP fails to treat the natural environment as anything other than a commercial asset to be exploited • Despite the SEEIP the SEP gives no strategic commitments or priorities to placing the environment at the heart of a developed economy • Importance of farming not mentioned • Does not address natural capital	11	See annex 3 about the need to prepare an SEA. We are committed to implementing and further developing the SEEIP with the help of partners. The SEP will refer to the SEEIP and support implementation of its policies The SEEIP mentions farming and natural capital
**County-wide plans and strategies**
3	• We need a 'Structure Plan' approach to be developed jointly by elected councils • Need a county-wide plan	12	We will need to await the outcome of the Oxfordshire Devolution agenda to determine whether

138

	• The SEP should foster strategic planning for Oxfordshire. The 'Duty to Cooperate' is clearly failing in the county. • Need for a county wide plan was mentioned at the workshop but not included in the SEP refresh • SEP to include specific action to support an Energy Masterplan for Oxfordshire • Adopted and emerging local plans provide a resource for the SEP to articulate future strategic land allocations • The Place section should state the role of Local Plans and how they set out spatial strategies for the county. This is a resource for the SEP to draw from to articulate future strategic development areas • SEP should be analysed by the local planning authorities and the agreed result should be considered the SEP for Oxfordshire • The CCHTIP could think about more than just tourism and enhance cultural opportunities • Need a fully resourced local nature plan to accompany the SEP		there will be a county wide planning authority. This is not the role of the LEP. The CCHTIP includes cultural activities
4	• A county-wide Design Guide is supported • Deign guide is an interesting proposition but would be better fit for Local Plans rather than being part of the SEP suite of documents	3	We agree that a Design Guide is a matter for Local Plans, although the LEP will be a strong advocate of high quality design across the county
	• A county-wide Design guide is not supported	1	Noted
Other comments			
5	• Priorities should include food, forestry and biodiversity enhancement for combined ecological and social benefits	1	See the SEEIP
6	• Need more studies on the environment	1	See the SEEIP

7	• Need more open space and trees. • Need to improve the management of land to reduce flood risk etc	1	See the SEEIP
8	• Heritage/legacy building such as the university colleges must be supported.	1	See the CCHTIP
9	• Tourist potential should include importance of Cold War history	1	Our priorities for tourism are in the CCHTIP
10	• The SEP should promote Electric Vehicle (EV) fast charging points to promote a sustainable environment	1	Part of LTP4/Smart Oxford programme
11	• Too much focus on low carbon economy where outcomes will be decided at a macro level	1	The SEP rightly identifies things that can be done at a local level to support a low carbon economy
12	• Need a commitment to zero carbon development	1	Matter mainly for local planning authorities but OxLEP supports growth of a low carbon economy
13	• Need to retain current employment buildings	1	Matter for local planning authorities. Retention has been made more difficult by recent changes in planning regulations, which are a central government matter.
14	• Need to highlight the role and importance of business in driving forward innovation in sustainability and to encourage the SEP to address the role of the LEP in encouraging business to fully understand and mitigate their impact on the natural environment	• 1	• We will refer to Oxfordshire's Low Carbon Economy report

140

Planning for infrastructure and housing (Place/Connectivity)

	Comments	Number of responses	OxLEP comments
	Infrastructure		
1	- How can the SEP be properly assessed without knowing what infrastructure is required to support it and whether this is deliverable? - There are plans for a dramatic increase in house building but nothing substantial for improving the road network/other infrastructure, leading to more congestion or a breakdown of the transport infrastructure. - Infrastructure needs to be built before the housing - Need for green infrastructure and leisure facilities - No plans to build schools, hospitals, increased health provision or increase energy supplies - Ignores the NPPF requirement on infrastructure - Infrastructure will have a low priority in developers plans - Developers will cherry pick sites - There is no tie-in with existing transport infrastructure - LEP should address the A40 issue as it is an important investment corridor - Oxford and its immediate surroundings are just one large traffic jam - Reduction in rural bus routes will increase congestion - Need integrated approach to infrastructure development - Need to look outside of the county boundary – regional transport routes are important - There are major inadequacies in water supply and national grid	119	The SEP provides an important framework to enable Oxfordshire to secure infrastructure funding of all kinds from Government. The SEP supports links between economic and housing growth and infrastructure improvements The Oxfordshire Growth Board is undertaking a range of work in the coming months including the Oxfordshire Infrastructure Framework, The Oxfordshire Strategic Infrastructure Strategy (to look beyond 2030). Regional infrastructure work is being taken forward by the England Economic Heartland programme. The SEP will allude to this work.

2	• Oxfordshire Growth Board and Oxfordshire County Council's work on the Oxfordshire Infrastructure Strategy will set out an agreed approach to the identification and prioritisation of the critical infrastructure – as such the SEP makes up a key element of the economic case for infrastructure investment – it is therefore an important document • Need a focus on Active Travel • There is a lack of ambition around transport particularly sustainable active travel. Oxford is a cycling city • Need a long term plan to develop and maintain a public transport system • Oxfordshire needs additional railways (including between Oxford and Witney – monorail) with new stations (i.e. at Grove) and excellent cycle routes (especially to employment areas), paths and bridle routes. • Need good, clean public transport – what happened to the electric buses? • Cycle way at Great Western Park junction with B4493 very poorly designed. • Need for transport solutions for young people in rural areas wishing to access training and jobs • Oxfordshire residents travel out of Oxfordshire for work and leisure and visa-versa and this needs to be recognised • All roads approaching Oxford suffer serious congestion which the recent road/junction works will not resolve. There is a need for a new relief road from either north or south Abingdon across to the M40. • There is little consideration of the need for transport solutions at the local regional level to alleviate the serious problems of congestion caused by high levels of private car use. • No mention of a genuine transport interchange in central Oxford	12	The SEP will refer to the Oxfordshire Infrastructure Strategy Oxfordshire County Council is developing an Active Travel Strategy. The SEP will refer to LTP4 where necessary

142

	Affordable housing provision		
3	• The SEP does not address real need – providing the right type of housing, in the right place, for the right people and at the right price. • Building new homes will not affect price and make it more affordable to local people • We cannot build our way to affordable housing – the housing market is insensitive to supply economics • Not only is there no capacity to deliver housing need, the industry itself is incapable of delivering the housing required • Nothing about housing people on current housing waiting lists • People need an appropriate property at an affordable level – there is no consideration of this in the SEP. • The real need for local people is providing somewhere for them to live, in a healthy environment and within their budget. • Without affordable housing and a healthy environment, talented young people will continue to move away. Giving permission for housing estates is not increasing building rates or bringing prices down. • Low cost housing is needed especially social housing in our expanding towns. • SEP should emphasise the need for social and key worker housing with a reduction in market housing that is going to buy to let landlords • Need to mention Community Land Trusts • Need more emphasis on the quality of new housing. • Under-occupation is an issue • The price of housing in Oxford is so high that well-off people are commuting to London. • Homes in Bicester are being built for people commuting to London	107	A priority under the Place programme area is to "support the delivery of new housing and business space which has been permitted by the planning system, for example through securing funding for access or infrastructure improvements" In addition, the Place section states that there is a need to "evolve approaches to social/affordable housing, consistent with the overall Vision, which provide better access to housing for low income and disadvantaged groups" The local authorities, rather than the LEP, have the main means to identify the scale and mix of housing needs and to ensure delivery of affordable housing through local plan policies and planning permissions. However, they are also constrained in what they can do to ensure affordable housing is genuinely affordable.

143

- No realistic policies on affordable housing
- No analysis of the need for housing in communities
- Who are the new houses for?
- Need starter homes for local people, including older people
- Congestion and house prices will continue to rise even without the SEP
- Need for many affordable homes
- Need to rethink densities – should be higher than 30 dwellings per hectare
- Need for support for smaller housing plots
- The houses that London-based property developers want to build will not provide a home for the homeless or family in housing need
- Need to restrict ownership of second homes and discourage the commuter corridor to London
- SEP should develop a campaign strategy aimed at government and London to accelerate the need to house people near to where they work.
- LEP should work to influence its partners to adopt policies to tackle the lack of affordable housing, for example, encouraging Oxford City to prioritise development sites for housing than for further jobs growth.
- University colleges could bring forward land already identified in the Local Plan
- SEP should encourage a programme similar to Cherwell DC whereby buildings in disrepair or vacant are used to provide affordable housing
- No new jobs to be created until housing situation is resolved
- To encourage a large proportion of executive and commuting home buyers will change the traditional nature and customs and make it difficult for enterprise to develop
- Too much executive homes being built in villages
- To continue to increase employment opportunities with Oxfordshire prior

	to the provision of truly affordable and social housing will make the situation worse by further increasing house prices and resulting in even longer commuting distances • Oxfordshire has great potential but without infrastructure and affordable and social housing, the county will cease to be 'one of the most attractive places in which to live and work'		
4	• Encroachment into the Green Belt is inevitable but only where no brownfield options remain as it has many former military and landfill sites which would improve the landscape if developed • Oxfordshire would benefit if Oxford, Bicester, Didcot and Abingdon were grown and integrated to become Greater Oxford. The scale of public transport could then be realised with connections to Birmingham, Bristol and London. • Excavate some of the Thames Floodplain and with the spoil build elevated causeways on which to build housing • If Oxford is full within the Green Belt boundaries, then it should become denser or grow upwards	4	Noted
Broadband/digital connectivity			
5	• Broadband access is poor / is a major issue • Digital connectivity must be a key element in the next generation economy • There is a need for superfast broadband, to be free in public spaces • The emphasis on broadband is good but are the speeds ambitious enough? • Need a focus on broadband 'not-spots' • Need a focus on mobile coverage • Improving ICT with intelligent broadband networks will enable greater productivity without the need to travel • Need to highlight community-owned solutions i.e. community broadband	13	A priority of the SEP under the Connectivity programme area is to complete countywide broadband coverage. The final version of the SEP will be clear on progress via the Better Broadband for Oxfordshire project, the Growing Places Fund support for superfast broadband for the

145

	initiatives etc • Encouraged by the mention in the SEP related to telecommunications, road/rail and the grid which are critical for growth		Enterprise Zone and the funding for superfast broadband in remote rural areas using the Agricultural Fund for Rural Development as outlined in the ESIF Plan
Spatial elements			
6	• Need more business space and employment in market towns • Market towns not recognised • Oxford has enough science and industrial parks • The SEP ignores south Oxfordshire – the villages and towns bordering Buckinghamshire • Neighbourhood Plans are not being given credence as not recognised in the SEP • Need for a new settlement outside the Green Belt along the main railway route • How is Banbury to be incorporated into the Knowledge Spine? • Need to mention Thame as a larger market town • LEP should designate the whole of Bicester as an Innovation District	13	We will refer to the key role played by market towns in the Oxfordshire economy in the final version of the SEP
Northern Gateway			
7	• The Northern Gateway development will make traffic congestion much worse by providing more employment for new workers rather than providing new housing for existing workers • Northern Gateway will be illegal in terms of air pollution • Object to northern Gateway • Suspend Northern Gateway until coherent plan is in place •	4	Noted but out of the scope of the SEP. This is a matter for the local planning authority.

Regional transport			
8	• Congestion and disruption on the A34 will not be resolved by a link to the M1 and the East • Should not develop around the A34 – expansion of Didcot needs to be carefully planned and surrounding villages retained. • Funding cuts and resources going into HS2 will mean that many infrastructure projects will not happen • SEP fails to identify networks and links to Reading, Hugh Wycombe, Milton Keynes and Gloucester	4	We will make clear our regional infrastructure ambitions in the SEP, including the work of the England Economic Heartland programme
9	• The SEP recognises the overlapping nature of the Functional Economic Market Area (FEMA) and how the inherent Travel to Work Area often serve different FEMA. Relationship between Oxfordshire and Thames Valley Berkshire LEP could be further strengthened in the SEP. • A34 needs to have three lanes • Agree with aspiration for the Oxford-MK-Cambridge link • Closer attention should be paid to economic advantages of East-West rail. • Building on recent research, the regional transport corridors in the Greater • Thames Valley should look at a two stage investment strategy: - Improving the core network of radial routes into London/M25 - Improving routes between growth towns in the GTV • The SEP should make more use of the need to improve north/south routes which could dilute dependency on London/radial routes • The SEP should emulate a statement made in the Oxfordshire Local Transport Plan 4 confirming support for a new Thames Crossing at Reading	9	See response to 2 above. Detail in LTP4
Local transport			
10	• Oxford Airport is of county-wide significance	4	Noted

147

	• Oxford area should network with Abingdon, Banbury, Witney, Bicester etc • SEP needs to reiterate the need for radical transport solutions in LTP4	

Annex 3 – Legal advice on a Strategic Environmental Assessment for the SEP

The principal area of concern raised by respondents appears to be the contention that the Strategic Economic Plan should be assessed in accordance with Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 to determine whether it "is likely to have significant environmental effects" [Reg.9(1)].

However, a plan, programme or modification (referred to, for ease of reference, hereafter as "a Plan") is only subject to this determination if it is of a description referred to in Regulation 9. Therefore, a Plan would have to fall within one of the following categories before the need to decide whether or not it would have significant environmental effects would arise:

(a) have been prepared after 21.7.04 and "set[s] the framework for future development consent of projects" [Reg. 5(4) (a) and(b)]; or
(b) prepared for [inter alia] industry, transport…tourism, town and country planning or land use and set[s] the framework for future development consent of projects of a specified type [Reg.5(2)(a) and (b)] or in view of the likely effect on sites is required to be assessed pursuant to Article 6 or 7 of the Habitats Directive [relating to special areas of conservation] [Reg 5(3)] ; or
(c) is for a minor modification of a plan of the type referred to in sub-paragraph (b).[Reg9(1)].

Therefore, (as it has not been suggested that the Habitats Directive would apply to the circumstances of this case) formal determination as to whether a Plan would be likely to have significant environmental effects would only apply where that Plan set the framework for future development consent for projects. If it does not, then it is not necessary to make such a determination either way.

The SEP does not set the framework for future development consent. Whilst it may be of persuasive value or influence in directing future economic development to appropriate areas, and to that extent could be a material consideration in the determination of a planning application, it has no planning status per se and could not be enforced to require either a positive determination for an application fulfilling its criteria, nor a refusal for an application which was in apparent conflict with it. Its aims and objectives are to stimulate economic growth and prosperity and to lever in financial investment and as such it does not formulate planning policies per se.

149

A relatively recent Supreme Court case on the circumstances which are necessary for a strategic environmental assessment ("SEA") to be required is R. (on the application of HS2 Action Alliance Ltd) v Sec. of State for Transport [2014]. In that case the Supreme Court found that the command paper which announced the government's proposal to promote the HS2 high speed rail link was not subject to SEA as, although it was prepared for transport, (and thus partially met the criteria in (b) above) it did not set the framework for future development consent. Lord Carnwath, delivering the leading judgment stated:

"It is not therefore to be assumed…that because a project is "strategic" in nature (as HS2 undoubtedly is) the presumption must be in favour of assessment under this directive."[para 35]. He continued in paragraph 36:

"One is looking for something which does not simply define the project, or describe its merits, but which sets the criteria by which it is to be determined by the authority responsible for approving it." He held that the paper "does not in any way constrain the decision-making process of the authority responsible…" He was supportive of the view expressed to him that "influence" in the ordinary sense [was] not enough. The influence must be such as to constrain subsequent consideration and to prevent appropriate account from being taken of all the environmental effects which might otherwise be relevant. Lord Sumption elucidated further:

"What it means is that the policy framework must operate as a constraint on the discretion of the authority charged with making the subsequent decision about development consent. It must at least limit the range of discretionary factors which can be taken into account in making that decision, or affect the weight to be attached to them….it cannot be enough that a statement or rule is influential in some broader sense, for example because it presents a highly persuasive view of the merits of the project which the decision maker is perfectly free to ignore but likely in practice to accept."

This latter statement perfectly encapsulates the position of the SEP, an Oxfordshire planning authority in determining an application may find the provisions of the SEP highly persuasive, but it does not intrinsically have greater weight than other material considerations and does not constrain that determination. It is the Local Plan which is instructive in this regard. The same considerations and conclusion with respect to the SEP apply equally to the SEEIP and CCHTIP.

Conclusion

150

In conclusion, the SEP (as too the SEEIP and CCHTIP) does not meet the qualifying criteria for a determination under Regulation 9 as to whether a SEA is required as it does not set the framework for future development consent. As the DCLG appears to have pointed out in its guidance, it should not be treated in the same way as the Local Development Plan. Therefore, the lack of such an environmental assessment and of any recorded decision as to why it was not considered to be required at the time the SEA was published or adopted (under Regulation 11, or otherwise) is not unlawful.

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For and on behalf of Nick Graham
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151

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