



## Oxford-Cambridge Arc Spatial Framework Consultation – July to October 2021 Chiltern Society Comments

### Creating a Vision for the Arc

#### **If you can, we would love you to tell us more about your vision for the Arc to 2050**

The Chiltern Society is a charitable body with nearly 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. We actively engage in the planning system through a network of voluntary planning field officers and co-ordinators.

The Society is actively involved in biodiversity in the Chilterns, owning and managing its own sites and working on projects to conserve and enhance biodiversity. We have recently published our own Manifesto for Chilterns Wildlife to support the implementation of the Chilterns AONB Management Plan.

<https://chilternsociety.org.uk/chiltern-manifesto/>

The Society doesn't have any in-principle objection to national government setting overarching standards or requirements, or setting strategic policies for the whole country. But this should only be when doing so at a national level (rather than regional or local) is appropriate or necessary.

However, in relation to the Arc, it definitely makes sense to plan across a regional or sub-regional scale, so there is nothing intrinsically wrong with a collective plan for a group of counties, but it is essential that all the counties are part of the proposal. Producing a plan covering Buckinghamshire without the involvement of the local council seems illogical and could lead to conflict between the Framework and the Local Plan.

The problem with these proposals is that, although many of the suggested policy elements in the Framework, for example all the ones in The Environment chapter, are commendable, it is all fatally flawed by the government's starting point that "growth" is the priority, and especially growth in an area of the country which is already one of the most prosperous.

This fixation is exemplified by the following quotes:

*1.1 The Oxford-Cambridge Arc is a national economic priority area. We believe it has the potential to be one of the most prosperous, innovative and sustainable economic areas in the world, and can make a major contribution to national economic recovery as we seek to build back better from the impact of COVID-19.*

*1.5 We think a joined-up, long-term approach to planning for growth is the best way to realise our ambitions for economy and sustainability in the Oxford-Cambridge Arc.*

*1.8 We believe that this approach will allow us to better plan for economic growth supported by new homes and infrastructure and more sustainable results...*

The wording in the Framework needs to make sure that the economic, community and environmental aspects of sustainability are given equal weight and fully integrated into the strategy in the long-term.

The current document seems to be applying short-term thinking to a long-term strategy. This is apparent in the following paragraphs:

*1.13 “.....We think it is important to also look at potential opportunities for transformation. The world will be a very different place by 2050....”*

*Yet 1.1 “.....and can make a major contribution to national economic recovery as we seek to build back better from the impact of COVID-19....”*

So, even though the world will be a very different place by 2050, the short-term effect on growth caused by Covid-19 is somehow seen as relevant to this! The real benefit of this exercise must be a Vision for what we want the area to be like in 2050, taking into account the likely changes in work patterns, communications and digital technology between now and 2050, and making a step change in the implementation of nature recovery and addressing climate change.

There are also similar internal contradictions within the document regarding engagement with local people:

*1.10 We believe that for the Spatial Framework to work best as a national planning policy for the Arc, it should be shaped by those who live, work and have an interest in the area.*

Yet, the document doesn't ask the local people about its overriding growth premise.

The document doesn't explicitly set out a requirement for “a million new homes”, or whatever, but this is perhaps implicit in “meeting all housing need”, as long as the currently proposed method of assessing need continues to encourage excessive development in the south east.

The Framework gives primacy to central government's ‘one-size-fits-all’ approach to developing a vision for the ARC, which, by its very nature is diverse and varies considerably in terms of topography, population demographics and infrastructures.

We support the concept of linking two of the country's important centres by improving connectivity, both digital and physical, and we recognise the merits of developing an overarching, cross-county plan, particularly in the context of forward thinking visions on cost effective, efficient and environmentally compatible systems for moving people and goods; this latter with a state-of-the-art rail link between urban hubs that are connected to their catchment areas by a sophisticated, interconnected network of public transport provision. But this persistent fixation on growth and the associated technical and economic development potential for the Arc region, flies in the face of the government's levelling-up agenda.

The Society considers that what the government should be doing in long-term strategies, is properly looking at the “very different place” the world will need to be in 2050: viz zero-carbon, growth as conventionally measured discarded as a yardstick [and, if retained, aim for negative growth], opportunities and employment more equably spread across the country, and any new housing (and it is very likely there will need to be some, even with revised population trends post-Brexit) and other development done in accordance with the commendable requirements in the Environment chapter. So **less but better** growth.

We have the following more specific points –

1.6 - We agree with the 4 policy pillars – environment, economy, connectivity and infrastructure, and place-making. This is a good concept, but its development and execution have to be tailored to local areas and is, therefore, best left to local / county authorities, with central government maintaining a coordinating role on cross-regional collaborations (the subsidiarity principle can apply equally here). Whether or not a range of views are expressed, they are local views, local concerns and reflect local engagement. They should, therefore, provide the basis for a local plan.

1.7 - The Strategic Framework needs to recognise that there are a number of initiatives within the Arc area where authorities are already working together on strategic plans. In Oxfordshire, the Growth Board is developing the Oxfordshire Plan 2050 and in Buckinghamshire the local Growth Board is developing a Strategic Vision. There is already a regional transport strategy in place, produced by England's Economic Heartland. The Spatial Vision needs to be co-ordinated with these initiatives to avoid confusion for members of the public, local organisations and developers. The Framework should include a chart showing the links with these and other relevant strategic plans (expanding on Figure 1.2).

The political situation relating to Buckinghamshire needs to be resolved as we understand the Council has withdrawn from the Arc partnership. This is not reflected in the text, which states that the Arc includes Buckinghamshire.

### **How do you feel overall about the future of the Arc? What are your hopes and fears?**

See above.

## **Environment**

### **Green spaces, nature and biodiversity**

The environment needs to be an integral part of the Spatial Framework. The development of a Vision Statement should start with assessing what environment we want in the future and how we will address the impact of climate change. Once that has been done, we can assess what scope and need there is for new housing and infrastructure development, and ensure that development is sustainable and does not compromise nature and biodiversity.

This is particularly important in the Chilterns, which is designated as an Area of Outstanding Natural Beauty (AONB) and has great scope for nature recovery and landscape enhancements. We are very concerned that the Arc area seems to have been expanded from a corridor along the previously proposed expressway to now cover the whole of Oxfordshire, Buckinghamshire and Bedfordshire. This brings a greater threat of development within the Chilterns area. We would prefer to either see the Chilterns excluded from the Arc or for it to have its own local strategy concentrating on nature recovery and landscape enhancement, rather than economic growth and new housing development.

Similarly to the AONB, much of the south of the Arc area is designated as Green Belt. This needs to be recognised in the future Vision as a major constraint on development in the south of the area. Under national planning policy, these areas are expected to remain open and be permanent. Again, development should be directed away from these areas. Whilst the Green Belt is not in itself an environmental designation, there is scope through the Vision to promote it as a 'nature belt' by providing incentives for nature recovery and enhancement in these areas.

The Spatial Framework needs to give more emphasis to addressing nature recovery and place restrictions on the development of green field sites for housing. We are experiencing an unprecedented decline in species and habitats across the country and only a step change in our approach to managing the countryside will help to meet the biodiversity targets being developed by the Government. The Framework makes several references to protecting and enhancing the environment and to nature recovery, but also needs to include biodiversity net gain. Whilst these are welcomed, there needs to be a more co-ordinated and pro-active approach, and this will need a fresh look at how land is used and managed across the Arc. This should be recognised as a key initiative in the future Vision statement. The Arc partnership should commit to working with the Nature Partnerships, statutory bodies and third sector organisations to co-ordinate delivery.

## **Climate change resilience and net zero**

In a similar way to nature recovery, there needs to be a much greater emphasis on climate change. Given the 30-year timescale of the Spatial Framework, there will be significant changes to the climate unless drastic action is taken. The Spatial Framework is worded to promote growth, seemingly at all costs. The future Vision should be looking to future scenarios where the focus is on sustainability principles and development is within the carrying capacity of the environment. Particular areas where more vision is needed are in relation to digitisation, addressing the need for travel and considering alternative working patterns. Innovation is required if we are to be carbon neutral by 2050.

Houses should be eco-designed from sustainable materials, with dual plumbing for grey/recycled water, and the use of both community-scale and roof-top renewable energy sources.

We should be encouraging the upgrading of existing houses to incorporate sustainability measures at about half the cost of a new build. VAT should be removed from refurbishment to level it fairly with new building.

## **Air quality and waste**

No comments

## **Water**

The development of the Arc Framework should be co-ordinated with the Environment Agency's Thames Valley Flood Scheme to consider water management at a whole catchment scale to manage water resources needs, prevent pollution and reduce flood risk.

The rare and precious Chiltern Chalk Streams are just being recognised internationally and should receive more protection from local/county government. The Spatial Framework needs to address water quality and water resource issues, including the impacts of over-abstraction on these Chalk Streams.

## **Economy**

### **Education and training**

No comments

### **Jobs and businesses**

This section of the report seems to give the economy too much precedence over environmental considerations. The overall strategy must be determined by sustainability principles, rather than accepting a high level of growth and then looking at mitigation measures to protect the environment. Alternative future scenarios must be considered, not just relying on the current economic model based on increasing housing growth.

The inference is that all is not well and, therefore, justifies a spatial strategy, see "3.4 We want to use the Spatial Framework to help tackle these problems". What problems is this seeking to address? There are challenges perhaps, particularly for the future, but no 'problems'.

The document makes little reference to the agricultural economy. It needs to put much more emphasis on the potential loss of good quality agricultural land which will be needed for farming and growing food for all the additional residents to avoid increasing and relying on imported food products.

As much of the Arc area (76% according to the report), and the Chilterns in particular, is rural, it is essential that we maximise the beneficial use of rural land for farming whilst creating habitats and interconnected networks for nature. In some locations there may be opportunities to encourage 'rewilding' projects.

## **Connectivity and Infrastructure**

### **Infrastructure**

4.1 - We agree that an important element of connectivity is reducing the need for travel. The Spatial Framework should consider future working patterns, including working from home and local hubs, rather than assuming people will drive to work. This is a particularly important issue for the Chilterns because development of housing in the Arc could lead to increased pressure on the roads through the Chilterns for people to access London. A more sustainable approach to transport is already being developed by England's Economic Heartland.

4.4 - There is an urban bias in this section, where studies tell "that a lack of transport and utilities infrastructure in *different towns and cities* in the Arc can hold back the area's growth and sustainability", and "we know that many people rely on private cars, and that to tackle climate change and improve air quality we will need to encourage them to travel by bike, foot or public transport". The report also needs to recognise travel issues relating to rural residents where public transport services are not easily accessible.

The consultation rightly recognises that "there are long-standing concerns about utility supplies – including water, flooding, digital, clean energy and waste recycling".

Whilst we agree with 4.5, we are concerned that much of this relates to the Framework's fixation for growth.

### **New development**

No comments

### **Getting around**

No comments

## **Place-making**

### **Location for growth**

No comments

### **Homes in your area**

Place-making needs to fully integrate the need for development with enhancement of the environment. The focus should be on using brownfield sites where possible and a biodiversity net gain of at least 20% should be built into new developments.

The Framework can, by all means, establish some basic, general, 'overarching' principles, but should leave the detailed local place-making to local authorities. You simply cannot apply a centralised, one-size-fits-all approach to this, certainly not over such a large and diverse area.

New developments need to reflect local distinctiveness and avoid the use of standard urban designs and cul de sac layouts in the rural areas. A commitment to working with communities through local Design Codes and Neighbourhood Plans should also be included in the Framework.

### **Design of new developments and streets**

No comments

### **Delivering the spatial framework**

#### **Engaging communities**

The document makes no reference to engaging with non-statutory bodies, such as environmental charities and other third sector partners. These organisations, such as the Chiltern Society, can have a part to play in the successful implementation of the environmental aspects of the Framework.

#### **Our commitment to data, evidence and digital tools**

No comments

#### **How we will monitor and deliver the framework**

No comments

### **Scoping report for Sustainability Appraisal**

4.10 – The Society supports the recognition of the importance of chalk streams in terms of their ecological and conservation value, and being an important consideration in planning future development in the Arc.

Figure 4.3 mapping priority habitats clearly shows the importance of deciduous woodland in the Chilterns. These areas need to be protected from harmful development and managed and enhanced to increase their biodiversity value. The establishment of ecological linkages between these woodlands should be a key part of a strategy for nature recovery across the Chilterns.

4.27 – The SA should consider the potential impacts of increased commuter traffic passing through the Chilterns to access London from the new developments to the north. This should include impacts on local air quality as well as increased disturbance to residents and recreational users.

Similarly, will the developments lead to increased demands for flights to and from London Heathrow, London Luton or Stansted Airports? Air quality and noise issues will be key considerations here.

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