Have your say on the Oxford-Cambridge Arc

The consultation document is available at: Creating a vision for the Oxford-Cambridge Arc - GOV.UK (www.gov.uk)

It is a high-level document essentially seeking to understand priorities to help inform a vision for the area. It asks for people to consider what they want from the Arc and how they consider the importance of environmental, economic, connectivity and infrastructure and place-making considerations.

The consultation document explains that it has been informed by a short series of initial workshops and conversations with a small sample of local residents, young people, academic experts, businesses, charities, campaign groups and local councils.

It advises that the comments received to the current consultation will help create the Spatial Framework's vision for the Arc to 2050 and inform the development of a Sustainability Appraisal.

The development of the Spatial Framework will be supported by two further public consultations: 1. Towards a Spatial Framework (Spring 2022) – using the vision as a foundation - developing options for delivering the Framework's objectives informed by feedback from engagement, initial evidence gathering and analysis. 2. Draft Spatial Framework (Autumn 2022) – consultation on the Spatial Framework with implementation of the final framework shortly after.

Theme	Nature of the question	Question number	Council's response (500 words)
Creating the vision for the Arc	Your vision for the Arc	1, 2	In 2021 the Councils in Oxfordshire all signed up to a Strategic Vision for Oxfordshire, developed by the Future Oxfordshire Partnership. In realising this vision, we acknowledge that it cannot be met without working effectively as partners in Oxfordshire, the region and beyond. We recommend this vision to you to inform the Arc Vision, with its focus on recognising the global role that Oxfordshire fulfils in solving some of the most pressing challenges facing humanity and Oxfordshire's global reputation to power real and lasting change through the adoption of clean and sustainable technology. The Oxfordshire Plan

			2050 emerging vision also echoes this, and sees a future where people are living in sustainable communities with a high quality of life and strong sense of community, where the integrity and richness of the county's historic character and natural environment are valued and conserved, and a wide range of secure and good quality housing options are within the reach of all. In October 2020, this council adopted their Corporate Plan 2020-24, this sets out the strategic vision and priorities. Our plan set out 6 strategic themes for our district: 1. Providing the homes that people need 2. Tackling the Climate Emergency 3. Building healthy communities 4. Building stable finances 5. Working in partnership 6. Working in an open and inclusive way We welcome opportunities to advance our priorities within the Arc that will impact on our ability to achieve our corporate plan objectives.
	Your vision for the Arc	3,4	The Council is concerned about what the scale of growth proposed will be, and whether it can be achieved without degrading our district's assets (landscape, historic environment, character) and delivered in a way that benefits rather than disadvantages our communities (congestion, air pollution, water availability, pressure on public services). The Council has declared a climate and ecological emergency and is aiming for zero carbon for the district by 2045. We are also developing a Climate Action Plan and working in partnership across Oxfordshire to address challenges at scale through the Future Oxfordshire Partnership. The growth involving adding built development raises concerns about environmental capacity. The challenge of

			reducing emissions from our existing population and transport systems are not resolved in our view. While we welcome joined up thinking across boundaries, Ox-Cam is not a natural geography to plan over, nor is it one that has been planned before, our more familiar spatial planning geography being Oxfordshire or the South East of England (South East Plan RSS). While Oxford and Cambridge share characteristics in common, as do Science Vale and the Cambridge bioscience cluster, other places like Milton Keynes, Bedford, Corby, Northampton, Luton, and Peterborough share little in the way of common character or issues with the Vale of White Horse area so there is a real risk that ambitions, policies, and approaches will not be suited to our area. Locally distinctive policies are needed to suit local challenges, so decision- making at the district and county scale is most likely to capture this. We are also concerned, like many districts, that the Arc spatial framework will impose decisions on districts about the quantum and location of growth, through a process which lacks the rigour of the development plan examination process and the engagement with local communities. The Council welcomes the future workshops with DLUHC to learn more about the bespoke and distinct character of the Vale and our ambitions for the future.
	Your vision for the Arc	5	The role of the ASF should be to provide planning policy for the Arc area that differs from the National Planning Policy Framework by being better. It should set ambitions high to create an exemplar of planning and placemaking that achieves high-quality, carbon-negative regeneration and new development, while respecting natural and heritage assets and local distinctiveness. Some problems are best led from the large scale, like a nature recovery network, nature-based flood risk management, decarbonised transport systems. Other planning issues are best resolved locally. One size will not fit all for the Arc. The ASF's thematic policies and spatial strategy should leave scope for strategic

			planning through co-operation between local authorities, like the Oxfordshire Plan 2050 and the Joint South and Vale Local Plan 2041, and for communities to shape their areas through neighbourhood planning. We ask that the Arc Spatial Framework plans for growth within environment limits. This should involve devising new methodologies in planning to measure the climate fitness of the Arc, identifying changes that will improve climate fitness of existing Arc population, and identifying growth only within the climate capacity of the Arc. The framework should both drive and require innovations in construction, energy, transportation systems and zero carbon development as a pre-requisite of growth. We need rapid solutions to climate change and the recovery of nature, to address existing environmental issues as well as new opportunities.
Environment	Green spaces, nature, and biodiversity	1-4	Environmental quality across the region has been in significant decline for many decades, and the Arc Spatial Framework should plan for a wholesale restoration and enhancement of the natural environment for the benefit of local people and wildlife. We support the Framework leading the way in decisive action to improve the state of nature, including requiring a high biodiversity net gain percentage for new development. This should have the effect of incentivising and directing development onto land of lower existing biodiversity value rather than high existing biodiversity value, so have a protective effect on the Arc's assets. The work on Natural Capital and the Local Nature Recovery Strategies should underpin the Arc Spatial Framework, as a strong example of positive collective action to improve the Arc.
	Climate change, resilience, and net zero	1-4	We support the principle to enhance the 'green Arc' and urge that the Arc becomes an exemplar and test bed for action on climate change. At a pan Oxfordshire level, we collectively want to have achieved carbon neutral status by 2040, and be accelerating towards a carbon negative future, removing more carbon than we emit each year. We want to be the first generation to leave the natural environment in a better state than that in which it was found, with a natural environment that is more biodiverse, resilient, and adaptable to change. The Framework's policies

			must provide sufficient protections for our environment, such as rapidly driving up building standards and creating low/zero carbon links between housing and employment, we believe that these should be set out in national policy. In Oxfordshire we are developing such policies through the Joint South and Vale Local Plan 2041 and Oxfordshire Plan 2050 and ask that Spatial Framework does not seek to limit our ability to raise standards even higher.
	Air quality and waste	1-4	Addressing air quality will require innovative and holistic thinking about how we plan places and enable healthy zero carbon lifestyles. We recommend thinking about air quality not just in terms of impacts on human health in congested urban areas, but also in terms of addressing impacts on natural habitats across the whole Arc through pollution and nitrogen deposition.
	Water	1-4	Our area holds large volumes of water within watercourses and floodplains, and also contain homes and communities which are subject to flood risk. Despite this, we are an area of water scarcity and water shortages. Water quality in rivers can be poor, drainage systems and sewage treatment works need investment. It is crucial that the scale of growth is kept within the limits of water availability, or it will increase pressure, further dent our resilience, raise costs on society and impact negatively on our natural habitats. An assessment of the capacity or headroom for growth should calculate the cumulative demands of development and the environmental and social impact of water scarcity. We ask that local councils and communities are involved in taking the decisions about the strategic infrastructure to meet this.

Economy	Education and training	1-3	Many businesses sectors and community services are suffering from skills shortages, an important consideration before planning for more jobs and economic growth in the Arc. Improving educational attainment and supporting training will be crucial as well as development of a skills system aligned to the needs of business and communities. It should also be noted that there are pockets of deprivation in our district, and it is important that any Arc proposals around education and training don't widen the gap and that there is equality of access to opportunities available especially in respect of upskilling and retraining post Covid-19.
	Jobs and businesses	1-5	The pandemic has revealed new ways of working that offer flexibility to workers and family life. Looking forward the Framework will need to provide scope for creativity in how we make use of business and employment space. This will mean looking beyond traditional models of predicting and providing employment space. This should include considering new formats and mixed uses, focussed on sustainable living (for example in 20-minute neighbourhoods) rather than the commute to conventional business parks and single use office space.
Connectivity and Infrastructure	Infrastructure and new development	1-2	The Council welcomes the opportunity to improve connectivity across the Arc by more sustainable modes of transport such as rail or where feasible active travel within and between settlements or reducing the need to travel at all. To meet national climate change commitments and deliver the vision of a green and innovative Arc, the emphasis should be on locating future development where it can be car-free. This is likely to mean an emphasis on urban renewal and re-using brownfield land within and at existing settlements. Public transport corridors could also be suitable locations, but only if homes are planned as car-free from the outset and public transport manages to regain modal share after the pandemic.
	Getting around	1-3	We have concerns that the first question in the Getting Around series is misleading. The question is "how important is creating better transport connections across the Arc and making sure they are provided in a way which supports sustainable growth", but the example given is "for example, planning for public transport and physical transport infrastructure requirements". The main question implies new roads and hard infrastructure, but below it the example refers to public transport. The Council, along with we suspect many respondents,

			would not support more road building (like the previous Expressway proposal) but would support planning for public transport. The question responses should be discounted from the consultation because the question structure is misleading and flawed.
Place making	Location of growth	1-2	As expressed earlier in our response to question 21, to meet the climate change imperative and deliver the vision of a green and innovative Arc, the emphasis should be on locating future development where it can be car-free. This is likely to mean an emphasis on urban renewal and brownfield land, re-using land within and at existing settlements. There should also be an emphasis on building at higher density, our most precious and finite resource is land, therefore we must manage it effectively. That means considering more housing per hectare without sacrificing the wider landscape and environmental standards. Public transport corridors could also be suitable locations, but only if homes are planned as car-free from the outset and public transport manages to regain modal share after the pandemic.
	Homes in your area	1-3	The number of new homes should be consistent with staying within environmental limits and the climate capacity of the Arc, so that zero carbon targets are met. Our recent experience in Oxfordshire, where we have planned and delivered housing numbers at a level above that which the standard method would require, has demonstrated that more housing delivery does not necessarily improve affordability by bringing house prices down. More analysis of demographics and a fine-grained understanding of needs will be required. This may point to other forms of intervention in the housing and land market to address needs more directly that current systems.
	Design of new developments and streets	1-6	The Arc should be developed as an exemplar of healthy placemaking and intelligent design. It should use the latest thinking to make places beautiful, sustainable, and successful places to live and work. This should involve not being afraid to let policies go beyond the National Planning Policy Framework's provision, so that the Arc is a place of ambition and distinctiveness which can lead the way nationally. For example, on planning for car-free development.
		1-3	Engagement methods should reach beyond traditional audience for national planning consultations (like the NPPF) to ensure that those living or working in the

Delivering the spatial framework	Engaging communities		Arc are properly engaged. As Local Authorities we are well placed to reach out to our communities and would welcome a partnership approach to future engagement on the Arc, conducting genuine consultation and engagement as the Arc goes forward to carry genuine public support. We also recommend providing opportunities for those beyond the Arc to explore whether they agree with a national focus on this area, given the levelling-up agenda. The next rounds of consultation should steer away from asking overly simplistic separate questions on nature, jobs, housing affordability etc, which people are likely to agree with as all 'very important', and instead seek to draw out people's priorities through exercises in ranking or points budgets. Rather than thematic issues, the next consultation should relate to people's local area and their priorities for it. Not 'are more homes important', but 'are they important in your area'. The questions could also explore people's attitudes to brownfield versus greenfield development, car-free development, re-purposing town centres, retail parks and employment parks.
	Our commitment to data, evidence, and digital tools	1,2	The Council supports the use of an evidence base (as would be expected for a Local Plan) and the use of digital tools. However, there is a risk that the large scale of the Ox-Cam Arc means that data is extrapolated across the area, assuming that all parts of the Arc are the same. There are clearly significant differences in character and issues, so a one-size fits all approach would fail to address local distinctiveness and local opportunities. We caution against generalisations for the Arc in how data is presented. This could lead to single policy solutions. We recommend that significant scope is left for strategic plans like the Oxfordshire Plan 2050, and local and neighbourhood plans, to cover issues that are better addressed at a more local scale.
	How we will monitor and deliver the Framework	1-4	We note the proposal for an Arc Growth Body and have concerns about the focus of this body on driving and supporting economic growth. Centralising decision-making into an Arc body with a growth remit does not appear to provide balance or strong local democratic accountability and scrutiny. We would welcome a clear role for local authorities in policy making and in prioritising local infrastructure schemes and investments.
			The Arc Spatial Framework will need robust monitoring and evaluation systems to ensure that ambitions are being delivered. Forming a base on which to

			measure from will be important. The creation and adoption of a vision will help with this as we can work from what success looks like. Measures should test the climate change fitness of the Arc, how well carbon reduction and nature recovery are being achieved. The reporting should be accessible to agencies and the public, and map based to show changes across different parts of the Arc which will also help communities and stakeholders hold policy makers to account. Flexibility should be built in to the Framework upfront to take account of changing circumstances and public opinion.
Scoping report for sustainability appraisal	Sustainability appraisal scoping	1	We note that the Sustainability Appraisal Scoping Report emphasises the potential for the Spatial Framework and associated ambitions to have a negative impact on the environment, unless there is significant mitigation. This needs to inform thinking on the vision and ultimately the goals and content of the Spatial Framework, to ensure that it delivers positive outcomes. A Framework that does not innovate and plan in ways that reverse carbon emissions, habitat loss, air pollution, health inequality and flood risk will be a failure and a wasted opportunity for this new tier of regional/ strategic planning. It is essential that the SA is robust and addresses cumulative impacts effectively. On air quality we note the proposed scope of the assessment (page 29) is restricted to emissions in urban centres, and only considers impacts those who live and work in these locations. We recommend this is expanded to recognise that air quality impacts are also felt in rural areas and that pollutants like nitrogen deposition impacts negatively on habitats and biodiversity as well as on human health.
	Additional strategic data	3	The evidence base for the Oxfordshire Plan 2050 offers a range of baseline data and recommendations for strategic planning, see https://www.oxfordshireopenthought.org/docs
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	Additional programme		The Oxfordshire Plan 2050 https://www.oxfordshireopenthought.org/oxfordshire-plan