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Christopher Pincher MP
Minister of State
Ministry for Housing, Communities and Local Government
2 Marsham Street
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Dear Christopher,

RE: Creating a vision for the Oxford-Cambridge Arc

We are writing in response to your public consultation seeking views on creating a vision for the Oxford-Cambridge Arc Spatial Framework. As you will know, as Leader I wrote to Simon Clarke, then the Minister for Local Government on the 20 August 2020, with copies to our Members of Parliament, making clear Buckinghamshire's withdrawal from the so called 'Arc Leaders Group'. I clearly set out our reasons for doing so. These included the increasing tendency for the views of individual councils to be marginalised as evidenced by the issuing of the so called 'Joint Declaration' by councils and MHCLG, which neither the then Buckinghamshire County Council, nor the Aylesbury Vale District Council saw or subscribed to before it was issued. The Arc had always been described as 'a coalition of the willing' by both local councils and central government. It was increasingly clear that this was no longer the case.

Therefore, we are particularly concerned to note that reference to Buckinghamshire in the documents does not make clear our position as a local authority on these proposals. It is absolutely essential that the public consultation is accurate and reflects the generally accepted legal principles that consultees have sufficient information in order to respond sensibly. Furthermore, a failure to refer to Buckinghamshire Council's position will be of concern to our constituents who will be well aware of the public statements that our local councillors in Buckinghamshire have made on the Oxford-Cambridge Arc proposals. We trust that you will address this concern immediately.

You will already appreciate that in addition to Buckinghamshire Council, the Buckinghamshire Local Enterprise Partnership and the University of Buckingham, also withdrew from the so-called 'Oxford to Cambridge Arc' Leaders' Group last October. Buckinghamshire is unique in the region of being a new unitary council delivering streamlined local leadership and governance that is coterminous with our Local Enterprise Partnership, our main business representative organisation (Bucks Business First), our Health CCG and Acute Hospital Trust and our college group. As a significant area of the south east of England with a strong shared 'place making' focus Buckinghamshire wants to be in control of its own future economic development and housing decisions. Instead, the Arc concept would potentially result in non-locally imposed targets, and

decisions about Buckinghamshire's future taken by votes from other areas as far away as Corby and the Fenlands. Furthermore, as a county we wish to support our businesses to develop opportunities wherever they occur, given the different contexts and needs of individual industries and sectors. These business linkages may be with Arc council areas but may just as easily be with Berkshire, London or indeed elsewhere in the country or even internationally. From my personal experience in business, opportunities are rarely dictated by Government defined geographies.

Nonetheless, when we withdrew, we wished the best to those councils who wanted to remain within the Arc Leaders Group. We also agreed we would continue to cooperate with them and indeed other councils and LEPs on a case-by-case basis. Therefore, this would enable discussions on the appropriate geography regarding matters that explicitly impacted upon Buckinghamshire.

Over the past eighteen months, here in Buckinghamshire, we have enhanced our proactive collaborative working with our partners on the Buckinghamshire Growth Board to ensure we as a place are at the forefront of driving economic recovery and growth out of the Covid-19 pandemic. The Growth Board will soon be sharing our collaborative strategic vision for the county that is being developed by the partners of the Growth Board and key stakeholders that will play a crucial role in delivering plans made in Buckinghamshire for Buckinghamshire. Our emerging strategic vision sets out our shared ambition and overarching commitment to deliver a thriving, resilient, and successful Buckinghamshire. As we finalise our own localised ambitions, it would be disappointing, to say the least, if 'top-down' Government regional policy, driven centrally, unduly affected our commitments to enhance Buckinghamshire as a place for its residents, communities, and businesses.

We have already been engaged for nearly a year with your ministerial colleagues about the exciting County Deal opportunities that could enable Buckinghamshire to contribute substantially to the Government's ambition of 'Global Britain'. This opportunity seeks to make the most for Buckinghamshire on a deliverable, place-based scale. This contrasts with a regional geography that is likely to be unwieldy, insensitive to local concerns, and which is likely to fail to deliver at pace. For convenience, the Buckinghamshire Growth Board's emerging strategic vision and initial recovery and growth proposition that was submitted to your ministerial colleagues at the start of the year can be found [here](#).

Lastly, we would ask you to acknowledge our reiterated position that the proposals to establish a Spatial Framework for the Oxford-Cambridge Arc will impact negatively on the production of local plans, such as the new Buckinghamshire Local Plan. A spatial framework for the Arc would be a 'material consideration' for new Local Plans.

In conclusion, we would urge MHCLG to reconsider its proposals and look closely at the probably social, economic, environmental, and political impacts of a Spatial Framework. We have set out several specific comments in the technical appendix to this letter. These highlight and explain our concerns and challenges, and rationalise our unease at your proposals.

Yours sincerely

Martin Tett
Leader of the Council

Technical Appendix:

This technical appendix expands our comments on MHCLG's Oxford-Cambridge Arc *Creating a Vision Consultation* thematically. Buckinghamshire Council would welcome clarification from MHCLG on the concerns set out below.

Implications for local policy

As stated above, the proposals for a Spatial Framework for the so-called Oxford Cambridge Arc is of significant concern for the Council. The Framework will set national planning and transport policy for the area, therefore imposing an additional layer of complexity and requirements on the production of Buckinghamshire's first countywide Local Plan and next Transport Plan. As a new unitary authority in the process of transforming services in Buckinghamshire, these Arc proposals create further difficulties and uncertainty. Whilst a timeline is set out for proposed consultations and publication of our Plan, we are no clearer about what happens next. For example:

- How will any evidence base be developed for the Arc Spatial Framework?
- Are local authorities to be involved in the evidence base process?
- At what stage would local authorities input into an evidence base?
- How do MHCLG plan to engage in preparing the draft Spatial Framework?
- What level of scrutiny will the Spatial Framework be subject to?

Linked to this, we have specific concerns regarding the process for identifying *the most sustainable locations for new homes* and *Opportunity Areas* for growth. In particular, we welcome clarification on the following:

- How will the development process of the Spatial Framework identify locations for growth?
- How specific will these areas be?
- What are the expected quantities of growth?
- Why will the Spatial Framework that will be making land use allocation not be subject to an Examination in Public?
- How will the existing Green Belts be considered?

In addition, essential to good planning requires the identification, coordination, and significant investment into supporting infrastructure. Current infrastructure across Buckinghamshire is in need of investment, and existing planned local growth will create further pressures without it. The consultation material suggests that the Spatial Framework could help to identify the long-term need for new infrastructure and investment. This would occur alongside the creation of an infrastructure plan. However, there remain concerns about the implications of this proposal. Notably:

- What status would an Infrastructure Plan have?
- What implication will it have on the need for Local Infrastructure Delivery Plans?
- How will schemes be identified as priorities, and what local input will be included within this process?
- How will the schemes be funded?
- How will existing local authority guidance, for example, related to education infrastructure, be taken into account?

The consultation material also commits to an Economic Strategy, *supported by strong economic evidence*. While we have highlighted our concerns regarding the implications of these commitments on future strategies, it is unclear how a proposed Spatial Framework and commitments such as the Economic Strategy will align with existing strategies. For example, it is unclear:

- How will an Arc wide Economic Strategy align with Local Industrial Strategies (LIS), Economic Recovery Plans (ERP), or any Local Economic Development Strategies (LEDS) that exist?
- What the scope of an Economic Strategy would be? For example, would supporting individuals and human capital be considered?
- Will funding be allocated to support the delivery?

These concerns extend beyond the alignment to the LIS, ERP, and any LEDS as it is unclear what the implications will be to commitments made by Arc wide policy. We would urge MHCLG to clarify these concerns and appreciate the potential impacts on locally developed strategies.

Governance and economic growth

In respect to governance and economic growth, first, we wish to raise our concerns regarding the proposed Arc Growth Body. The consultation documents state that the Government is considering setting up a new Arc Growth Body to provide *the clear economic leadership voice to help businesses and innovation within the Arc.* Furthermore, it is suggested that the Body would *help to boost the area's potential as a global innovation powerhouse by promoting the Arc internationally.*

However, it is unclear how an Arc Growth Body would be established, who would be involved in the body, how it would operate, and its remit. In addition to this, there is no explanation as to how the potential Body would interact and interface with existing governance structures across the so-called Oxford Cambridge Arc geography, including Buckinghamshire Council and the Buckinghamshire Growth Board. This proposal raises concerns at what the potential Body's responsibility could be, and what democratic accountability there would be for its decision-making. We urge the Government to clarify its proposals about the potential Arc Growth Body alongside reconsidering the wider proposals for the so-called Oxford Cambridge Arc.

We note that economic statistics, such as GVA, employment rate, and employment by sector, are included within the consultation material. Whilst these stats provide a foundation for explaining government ambitions for the area, there are many other statistics that could be used to demonstrate the true condition of the economy. Furthermore, the use of so-called Oxford Cambridge Arc wide statistics also masks significant variations that will be evident across the area. It is unclear what these stats are designed to do or how they will shape any proposed framework or strategies across a heterogenous region.

The consultation material references 'strong and innovative' sectors that are present within the area, we appreciate references to Buckinghamshire's sectoral super strengths and acknowledge the strategic importance these clusters have in supporting our long-term prosperity, however we are concerned that other sectors, in which businesses are operating innovatively, supporting the economy, and offering opportunities for growth, are not considered. The consultation does not indicate how any proposals for the Arc area would support these businesses. Likewise, where there

is a sectoral cluster in one area, it is unclear what the benefits are to businesses in the same sector but not geographically close. Prompts in the Economy chapter indicate that focus would be placed upon "new workspaces in places where they can make the most of cross-sector collaboration" and "putting industries in the best places to suit their needs", which causes a risk of employment and economic growth being concentrated in certain areas. There is a further risk that businesses move from their existing locations significantly disrupting commuter patterns making transport planning more difficult, and negatively impacting the economy in affected areas including reduced local spend.

Digital infrastructure is vitally important, the impacts of Covid-19 have changed the way people and businesses operate. People and businesses will not always need a dedicated physical space in which to learn and work. However, learning or working from home requires digital infrastructure fit for purpose. This significant shift in working approaches should be analysed appropriately and reflected in assumptions for the future economy.

Within the consultation material, there is a physical focus to growth proposals however, sustainable economic growth is about people as well as place. To ensure growth is felt by all, consideration should be given to skills development and employability support. Yet, it is unclear how these have been considered. At the end of the Economy chapter, there are questions included on education and training but background information on this is limited.

As noted previously the headline data presented on the Arc conceals significant differences between places and amongst different demographic groups. The document makes some reference to the benefits of growth not being felt by all. However, there are also concentrations of deprivation within the area. Not everyone in the so-called Oxford Cambridge Arc is highly skilled or employed in an innovative sector. Consequently, it is unclear what social and economic benefits the so-called Oxford Cambridge Arc will offer to these individuals and how the region will be 'levelled up' through this framework.

Finally we identify that reference towns and village centres is insufficient. Whilst reference is made in the material to ensuring good access to town centres, the changing nature of town centres and challenges and opportunities are not identified. In Buckinghamshire, we are focusing heavily on creating future-proofed quality town and village centres that are vibrant, resilient, and connected. Town and village centres are at the heart of communities, bringing people together, providing flexible workspaces, and supporting the needs and wants of both existing and new communities. We consider them a strong selling point for inward investment, yet it is unclear how the current Arc proposals would offer any support for town centres regeneration.

Transport connectivity

Aligning to our concerns about the specificity of potential housing and opportunity areas in the Spatial Framework, Buckinghamshire Council is very concerned about the potential impact on Buckinghamshire's highway network. The area of north Buckinghamshire is rural in nature, comprised of small market towns that are largely connected by single carriageway rural A and B roads. Town centres are congested and severely constrained, with limited to no capacity to accommodate additional traffic. The area is also poorly connected to the Strategic Motorway network making strategic links to the wider region and employment areas challenging.

New transport infrastructure that complements the traditional market town and historic rural road nature of North Buckinghamshire is vital to securing long-term prosperity in the area. We acknowledge England's Economic Heartland (EEH) Transport Strategy is recognised as the strategy for the region and that the proposed Spatial Framework would build upon the priorities listed in the EEH Transport Strategy. EEH engaged closely with all local authorities in the EEH area to develop this strategy and it sets out ambitious targets for transport in the area. Any new transport-related proposals should complement this strategy and be developed in agreement with the EEH Authorities.

While we welcome the approach that walking, cycling, and public transport should be the first choice for transportation within the so-called Oxford Cambridge Arc the practicalities of this in a largely rural area with dispersed and lower population densities and poor connectivity to major employment areas means that road transport is still likely to dominate and be the main choice of transport in the area. Buckinghamshire Council are a strong supporter of East West Rail (EWR) and see this as being transformational for northern Buckinghamshire; providing connectivity and opportunities in Oxford, Cambridge and further afield and supporting the existing planned growth in Aylesbury. But, the Aylesbury link still lacks government's commitment for delivery, which undermines our confidence in the stated aspiration of delivering more sustainable transport modes and achieving a modal shift in the area.

The key transport-related challenges / priorities for Buckinghamshire are set out in greater detail below:

- North-south connectivity is a strategic priority for Buckinghamshire. In your map of major transport routes, there is no strategic north to south road or rail network that covers Buckinghamshire. Reliance is currently placed on a network of rural A and B roads that route through towns and villages which are congested and not appropriate for significant growth. We would need considerable forward investment in north-south and Major Road Networks (MRNs) to support any further sustainable growth in the area.
- East West Rail has significant strategic importance to Buckinghamshire, providing improved access to public transport and better connectivity across the north of the county with greater strategic links with Milton Keynes, Cambridge, Oxfordshire and beyond. The new station at Winslow is fully supported by the Council, along with the planned Aylesbury Link that is essential in supporting the current and future prosperity

of Aylesbury. New development sites in Aylesbury were deemed more viable partly because of the new rail connection proposed by EWR. Therefore, it is essential that EWR is delivered in full, including the connection between Claydon Junction and Aylesbury, known as the Aylesbury Link. This should be delivered as a two-track route to achieve maximum economic and decarbonisation benefits for Aylesbury. The route should also support roll-out of improved digital infrastructure in Buckinghamshire through a first-rate digital spine provided by the major infrastructure project.

- Northern Buckinghamshire is predominantly rural and comprises smaller towns and villages and a traditional rural highway network. Whilst recognising that decarbonisation of our transport system and reducing the need to travel are important, our population in this area is ageing, highly car-dependent, and there are limited options for travel by non-car means. There remains a need to accept that our existing dispersed population will remain car-dependent for the foreseeable future. Therefore, there is a need to cater for high levels of car travel in the short term, whilst investigating and bringing forward focused means to encourage public transport, walking, and cycling through a forthcoming Buckinghamshire-wide Local Cycling and Walking Infrastructure Plan and forthcoming Bus Service Improvement Plan. These plans will acknowledge the localised nuances in Buckinghamshire that the Spatial Framework's regional approach is likely to miss, therefore failing to consider local circumstances and challenges.

Environment, ecology, and ecosystem services

Improving our environment is one Buckinghamshire's priorities. We are a beautiful county, and our stunning natural and historic landscapes are home to local, national, and internationally recognised species, spaces, and habitats. Over a quarter of our county is within the Chilterns Area of Outstanding Natural Beauty, and the Metropolitan Green Belt covers a further third. The need to deliver new homes and associated infrastructure for our growing population must be sensible, responsible, and sustainable, benefitting the existing local areas. The concept of the Arc Spatial Framework may limit our ability to respect such values that are imperative to delivering a thriving, resilient, and successful Buckinghamshire.

Questions posed within the consultation material seek opinions on the importance of protecting, restoring, and improving the natural environment. However, there is conflict associated with this, which is unclearly addressed. In some instances, allowing access to nature can result in a degradation of habitat and loss of sensitive spaces. Where the natural environment is protected, restored, and improved, there can be three categories for considering the management of space. These are space which is managed:

- Primarily for human recreation (should be limited to formal play and sports)
- Primarily for wildlife and excluding people (likely to be limited to the most sensitive areas)
- For both people and places (should be the most prevalent)

The relationship between these types of space and between them and other land uses is critical to their success. As a result, it is not easy to see how the proposed approach to the so-called Oxford Cambridge Arc would consider the Lawton principles for biodiversity of bigger, better, connected and more, that are important when planning for the natural environment. It is also

essential that these are considered both holistically and in the context of individual sensitive species and habitats.

The Council notes that connectivity and infrastructure are considered within the consultation material. It is positive that green and blue infrastructure has been recognised as needing to be identified and plotted along with other forms of infrastructure. But there are likely to be local nuances and we would welcome further clarification on how this could be undertaken. Secondly, it is unclear whether the actual wide-ranging benefits of green and blue infrastructure are appreciated. These elements need to be considered holistically as well as individually. Buckinghamshire has already committed to ambitiously increasing is tree planting. This priority has wide-ranging benefits, and the incorporation of trees in development and the broader landscape is important not only for good place making but as an efficient way of achieving a wide range of environmental improvements.

Buckinghamshire is one of the pilot areas for Local Nature Recovery Strategies (LNRS) which will play an important local role in supporting our environment. While further analysis is required before our LNRS is adopted, it is unclear where or what the links to LNRS are when these will contain crucial and detailed data that is expected in evidence bases. We consider that the collection and interpretation of remotely sensed data in coordination with existing environmental mapping data should be modelled as an important method of understanding the constraints and opportunities for the natural environment. For example, hyperspectral mapping can identify the tree canopy cover for the area, different species, and areas of potentially poor environmental health.

Regarding the sustainability appraisal scoping report, it is right that biodiversity is in the consideration of issues and opportunities, but the accompanying detail would limit how effectively it would be considered as it is limited to designated sites and not the wider landscape. There is a distinct lack of clarity when considering the consultation material. In the scoping appraisal, biodiversity is scoped in; however, the proposed 'Spatial Framework' issues identified are relatively limited. In relation to habitat loss and fragmentation, it only references designated ecological habits'; however designated sites are only part of wider habitat networks and they cannot function in isolation. Wider habitat networks include a variety of spaces and features that may be less significant in isolation but are essential to wider ecological functionality when taken together. Therefore, habitats must not be confined to those which are designated.

In addition to this, it is suggested that only significant effects will be considered, which could mean that the cumulative impact will not be reflected. As a result, it could risk efforts to avoid, mitigate, and compensate for the other impacts not being factored in. Consequently, this may leave an impression that any proposed Spatial Framework is more sustainable than it is.

Finally, ecosystem services and natural capital are given value in the appraisal document. The validity of this valuation is questionable as the detail is not given on how financial values have been determined. It appears likely that they are based upon estimates which do not consider the true, full value of natural capital and ecosystem services. For example, woodlands are identified as providing flood mitigation, and this is given a value, but the positive or negative value of other land uses for flood mitigation is not considered. Meadows and hedgerows can also have beneficial value with regards to flood mitigation, whilst agricultural land (arable in particular) may have negative values due to the lack of vegetation at sometimes of the year and the runoff of soil into stream, rivers and, drainage networks which can reduce their capacity. It is also true that urban areas will have negative impacts in many cases regarding flood

mitigation. The full costs and benefits relating to natural capital and ecosystem services need to be considered. Only then can this type of approach be used to inform decision-making. Otherwise the justification for future decision-making will not stand up to scrutiny and decisions will likely have substantial unintended consequences. Understanding the full costs and benefits relating to natural capital and ecosystem services is a substantial task. It is unlikely that all the values and variables have been taken into account in one place before. Substantial investment needs to be made to establish a reliable and replicable approach. There is also a need for considerable time and resources to develop an up to date and accurate understanding of the baseline. The LNRS pilot for Buckinghamshire made a start on this but more work is needed.

The Historic Environment

In addition to its inherent cultural interest, the historic environment plays a significant role in what makes the existing area special. Local distinctiveness or identity is influenced by historic buildings and archaeology, patterns of settlement, fields and landscape, townscape, and street forms, all of which contribute to a unique sense of place that is appreciated by residents, workers, and visitors alike. The historic environment has the potential to be a powerful driver for economic growth, attracting investment and tourism, and providing a focus for successful regeneration. Alongside the best in new design, the historic fabric of a place is an essential element in creating distinctive, enjoyable, and successful places in which to live, work or visit. Heritage can also be a significant focus for local communities, helping to bring people together and define local identities. It also has an important role to play in combatting climate change by promoting the inherent sustainability of historic buildings and their reuse as a lower-carbon alternative to new build. We consider that the historic environment opportunity, which is recognised as a key element in Buckinghamshire's emerging strategic vision, appears absent compared to other elements of the proposed framework.

The Council considers that it would ultimately fail to recognise the historic environment's full extent and importance. For example, it is not mentioned in 'Creating a vision for the Oxford Cambridge-Arc' (excepting in a passing reference to local plans) albeit it is recognised in part in the scoping report. Nationally, the Heritage Sector is an important economic sector with a total GVA of £36.6bn and providing over 563,509 jobs in 2019 (pre-Covid-19) (Historic England, Heritage and the Economy, 2020). Heritage employment growth outstripped the rest of the UK economy, growing almost twice as fast between 2011 to 2019. Its economic contribution should not be underestimated. Therefore, it is critical for the success of sustainable growth that it is given proper consideration. This consideration will need to be underpinned by an appropriate evidence base wider than just the consideration of designated heritage assets.

It is disappointing that the 'Historic Environment' is not included under the consultation questions for the 'Environment' or in chapter 2 of 'Creating the Vision', nor the interweaving relationship with the natural environment recognised. Human activity has helped shape the natural environment for millennia leaving evidence, for example, in the form of, field systems, woodland management, parklands, paths, routeways, buildings, water and the biodiversity and land use activities they support. In turn, the natural environment and its geography, climate, and geology have all influenced settlement patterns, industrial processes, building design, and materials and subsistence activities.

In relation to climate change, the vital contribution that the historic environment can make to reducing carbon emissions and flood risk is not recognised. This can take many forms such as the sympathetic refurbishment and retrofit of traditional buildings, which will emit less carbon than

building new buildings, using fewer materials and reducing waste; through preserving and expanding the forests and woodlands which often have significant heritage value and act as a carbon sink; and by maintaining the natural historic environment of greenspaces reducing flood risks and lower temperatures.

As outlined in the comments related to governance and economic growth, any consideration of the historic environment needs to be based understanding and analysing each area's unique history, local character, identity, and context to avoid the generalisation of important findings.

In respect to the sustainability appraisal scoping report, we are concerned that the historic environment has not been recognised to its fullest extent/potential within the strategic context section nor in the scoping annexe, neither in terms of its full breadth or the range of economic, environmental, and social opportunities it can provide. Part of the problem is that the evidence base relied upon for this purpose is too narrow with a principal focus on designated heritage assets and upon the built environment.

Whilst again we welcome that the historic environment has been scoped in and been given its own sustainability theme, we would highlight a number of issues apparent in the scope as set out (table 5.1 of the report): 'archaeology' is also a heritage asset; use of 'international renown' could suggest that only designated heritage assets of the highest order will be assessed excluding the majority of heritage assets from assessment; and that only where their 'attractiveness' will be affected will this constitute an issue (again see similar in sections 1.11-1.19 of the scoping annexe). Identifying the individual heritage assets, the elements that can contribute to their significance, and how this significance may be impacted should be assessed following the guidance as set out in the NPPF, NPPG and Historic England Good Practice Advice notes. This will include many types of heritage assets, e.g. archaeology, landscapes, buildings of local interest, parks and gardens, not just designated heritage assets.

The range of potential historic environment issues highlighted is very narrow, and we would point the Government towards Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment (2016) for further guidance. The Options and Assessment Stages assessing the various options put forward and those going ahead for full assessment must include an assessment of all the potential effects upon the historic environment along with any mitigation measures identified. Cumulative effects arising must be assessed, and proposals for monitoring the effects are important.

Similarly, the list of opportunities is very short and focussed fully on delivering benefits to the historic environment. It should be recognised that the historic environment can also deliver cross-cutting economic, social and environmental gains, for example, by fostering heritage-led regeneration at the same time as addressing heritage at risk or helping mitigate climate change using traditional skills.

Additional Strategic Data should include the Historic Environment Records (HERs), which hold a wealth of information on locally, regionally, and nationally significant heritage assets and are the primary source of information for planning, development-control work, and land management. It is important that data is gathered as the baseline currently set out in the consultation documents is inadequate for the purpose of developing a Spatial Framework.