

Introduction

CPRE, the countryside charity, campaigns for a beautiful and thriving countryside that enriches all our lives. As well as the national charity, we have 60,000 members and supporters, a network of 43 county-based charities and more than 200 district-based groups across England. Our members and supporters, including around 1,600 parish councils, are actively involved in local planning issues relating to the communities and wider countryside where they live.

CPRE welcomes the opportunity to contribute to this consultation exercise. Our response has been prepared through collaboration between our national charity and the five local CPRE groups within the Arc area: Oxfordshire, Buckinghamshire, Northamptonshire, Bedfordshire and Cambridgeshire.

This response document is in three parts:

- CPRE's overall critique of the Oxford-Cambridge Arc as it has emerged so far;
- CPRE's agenda for what we would wish to see the Spatial Framework do;
- Detailed comments in response to the consultation questions.

Headlines

CPRE's longstanding support for the concept of strategic spatial planning is predicated on the potential to deliver better, more sustainable and more integrated outcomes. Unfortunately, the Arc as currently proposed appears at risk of doing the opposite, in particular by detracting from the levelling up agenda and by missing a crucial opportunity to rise to the climate challenge.

Having an instrument of national planning policy which applies to only one part of the country is uncharted territory for the planning system. CPRE are concerned that this creates a situation which is either unfair – a tilted playing field; or ineffective – not being able to add anything that shouldn't apply nationwide. If there is a justification for going beyond national policy in order to do better planning, then really it is national policy that needs to change.

We also have serious concerns about how the Spatial Framework will ensure proper community engagement and transparency, in the absence of the full scrutiny to which Regional Planning Guidance was given. Until we can see how these concerns will be satisfactorily resolved, it will not be possible for CPRE to support the Arc Spatial Framework.

To meet the National Infrastructure Commission's recommendations would require major road-building, and around 720,000 houses to be built on greenfield land across the Arc area. This would be damaging and unsustainable, and therefore unacceptable to CPRE for the reasons we explain in our response. CPRE has a progressive campaign agenda, and we would wish to see the Spatial Framework help implement it. Our priorities are as follows:

- There must be unequivocal, measurable policies to tackle the climate and nature emergencies;
- Protection and restoration of both designated and non-designated landscapes should underpin policy, while industrial landscapes characterised by warehouses, surface car parks and brownfield sites should be transformed to incorporate renewable energy, green infrastructure and reduced car dependence;
- Provision of sustainable water supplies, reduced flood risk and effective waste water treatment should be established as baseline conditions for new development;

- There should be a strategic, Arc-wide approach to the future of farmland and food security;
- The Framework must accept the harsh reality that new road capacity and road-dependent development is unsustainable *per se*, and can no longer be justified;
- Transport policies must commit to reducing car travel and focus on accessible, walkable neighbourhoods connected by excellent, affordable public transport, in both urban and rural areas;
- A nationwide approach to ‘levelling up’ is needed which prioritises social rent housing as the key issue for areas where housing costs are prohibitive, especially in rural communities.

If the Arc Spatial Framework can show that it will deliver on these priorities, in a way which secures full community engagement and scrutiny and does not create a two-tier planning system to the detriment of other regions, then CPRE would be encouraged to take a more positive position.

1. The Arc: CPRE’s critique

- 1.1 Both conceptually and practically, the Arc has an existential crisis, and this urgently needs to be resolved. The crisis arises because different stakeholders have profoundly different starting points as to what the Arc might be.
- 1.2 The Arc’s origin in the National Infrastructure Commission (NIC) report *Partnering for Prosperity* (2017) was the notion of an infrastructure-led make-over of a wide geographical area, featuring a housebuilding and economic development bonanza linked to the Oxford-Cambridge Expressway and to East-West Rail. It is notable that the NIC report contains not one single reference to the most pressing challenge of our times – the climate emergency.
- 1.3 We were pleased to see the cancellation of the Bedfordshire to Oxford section of the Expressway project: the building of major new road infrastructure as the basis for economic growth is a 20th century solution to a 21st century problem, and such schemes should be consigned to history. CPRE’s reports (*The end of the road? Challenging the road-building consensus*, March 2017 and *The Impact of Road Projects in England*, March 2017) showed that road schemes invariably do more environmental harm than they claim, and rarely produce anywhere near the economic benefits they promise. Highways England’s analysis, that the cost-benefits of the scheme would be marginal at best, echoes CPRE’s findings. And new roads always induce more road traffic, which is incompatible with addressing the climate emergency and runs counter to the underpinning rationale for East-West Rail – that it would promote sustainable travel.
- 1.4 However, CPRE remains concerned that the A428 improvement in Cambridgeshire is continuing to promote an ‘expressway’ standard road; and in recent days we have heard that an Oxford to Milton Keynes ‘link road’ is still being promoted. This is unacceptable.
- 1.5 East-West Rail does indeed offer great potential for sustainability, and CPRE has supported it in principle to date. Nevertheless, CPRE’s support for the Bedford to Cambridge section is contingent on a reconsideration and re-consultation on a preferred route. The alignment option for a southern route at Bedford maximises the benefits of following the A421 corridor and thereby enabling modal shift. The current route ‘E’ proposals appear to be principally focused on unlocking development land in beautiful and highly productive countryside. The

resulting development would tend in reality to be mainly accessed by road, not rail, inducing further negative transport impacts and wider damage to the landscape and the rural economy.

- 1.6 The NIC report states that “East West Rail and the Oxford-Cambridge Expressway provide a once-in-a-generation opportunity to unlock land for new settlements.” This is an unacceptable objective. Notwithstanding the cancellation of the Bedfordshire to Oxford section of the Expressway, recent new settlements do not have a good track record of creating sustainable outcomes. A recent report by Transport for New Homes (*Garden Villages and Garden Towns: Visions and Reality, June 2020*) examined a range of ‘Garden Town’ schemes across the country, and found them to be predominantly car-dependent and failing to fulfil their promises of sustainability. Indeed, several were found to be predicated on major road upgrades.
- 1.7 We can see, therefore, that the NIC vision for the Arc, as we pointed out at the time, was deeply flawed, most profoundly so in its ignorance of the climate emergency and its naivety that new settlements and new roads might be achieved without long-term environmental damage.
- 1.8 By the time of the Arc Spatial Framework Policy Paper (February 2021) a very different set of underpinnings for the Arc were emerging. The most telling statement in the paper is this: *“The Arc is ...constrained by inadequate infrastructure, a stressed and fragmented natural environment, escalating housing costs, and complex local governance. It is at risk of worsening outcomes for the environment if we do not overcome constraints and meet future demands in the right way”*. Or to paraphrase, the pressures of development and economic growth pose a serious threat to quality of life and to nature’s carrying capacity. That being the case, it stands to reason that communities should expect the Spatial Framework to prioritise quality of life, social as well as physical infrastructure, and to tackle head-on the climate and nature emergencies.
- 1.9 In this context came the very welcome initiative by the Arc Leaders’ Group to publish a set of environmental principles (March 2021). CPRE did not fully endorse these because they did not adequately embrace landscape and built and natural heritage, but nevertheless they were an important step forward.
- 1.10 It is highly alarming that the Arc Vision consultation makes no reference to the Arc Leader’s Group’s environmental principles, and that the contextual basis – the risk of worsening outcomes – has also been watered down. On climate, the consultation asks respondents how they rate the importance of development *‘helping to achieve net zero carbon’*, a question which belies the fact that achieving net zero carbon is a binding legal requirement to which any strategic document must show its contribution.
- 1.11 This apparent weakening of the Arc Spatial Framework’s resolve on the environment inevitably leads CPRE - and other environmental organisations – to respond much more negatively towards the Vision than might otherwise have been the case.

- 1.12 At this point, the ‘levelling up’ agenda enters the picture. It is already the case that other parts of the country, mainly in the north, receive significantly less spending per capita on infrastructure than their counterparts in the south-east; and local government resources per capita are also much lower. Through this lens, channelling significant additional public investment and policy focus into the already fastest-growing parts of the country defies logic. The only possible way that it could contribute to ‘levelling up’ would be by ‘trickle down’ effects. Such effects have been proven to be a mirage for decades and simply cannot be relied on to reach those people in need of better economic opportunities.
- 1.13 Next, we must turn to the proposed status of the Arc Spatial Framework, as an instrument of national planning policy. As we understand it, it will be an adjunct to the NPPF, which sets out the scope and process for development plans, and is a material consideration in planning decisions. This raises a fundamental question: what will differ about a development plan or a planning decision, depending on whether or not it is within the Arc? In particular, we are concerned that:
- If it requires development plans to align with particular targets for housing and employment development, these could differ from the targets already being pursued by the constituent local authorities. If so, the derivation and scrutiny of these targets will not be transparent.
 - If it replaces existing Duty to Cooperate arrangements amongst the constituent local authorities, this would give Arc authorities an ability to plan strategically together that is denied to non-Arc authorities. This strategic advantage cannot be compatible with ‘levelling up’.
 - If it ascribes different weighting to different objectives, e.g. economic growth, carbon reduction, ecological or landscape impact, within the Arc compared to outside it, this implies that ‘sustainable development’ would be assessed differently in decision-making inside and outside the Arc. That would not be a tenable position.
 - If it makes spatial decisions, such as identifying sites, broad locations for growth or infrastructure projects that development plans will be expected to align with, the Spatial Framework risks closing off those decisions from the level of community and democratic scrutiny that development plans currently provide.
 - It is also unclear how the Spatial Framework would affect spatial and planning decisions in other planning authority areas. For example:
 - I. it may be a material consideration in a neighbouring authority;
 - II. it may establish a precedent for projects and programmes in other areas, such as the wider ‘Arc’ that has been mooted extending from Felixstowe to Southampton;

III. it may contain growth targets that are predicated on in-migration from other parts of the country, which themselves have in-migration aspirations and could find their 'levelling up' objectives compromised by their intended workforce being drawn into the Arc area.

- 1.14 The answers to all of these questions are currently absent, which makes it very difficult to provide meaningful comment. However, the problem seems clear. On the one hand, if the Arc Spatial Framework does provide for planning to be done differently within the Arc than outside it, this appears to tilt the playing field: the decision-making process would be different in the five Arc counties than elsewhere. And if the intention is to deliver better outcomes in the Arc, then the planning system is being configured to deliver better outcomes inside the Arc than outside it. That would be unfair, and would run counter to 'levelling up'. On the other hand, if the Spatial Framework does not tilt the playing field in this way, then having a national policy instrument dedicated to the Arc does not seem justified by any aspiration to deliver better outcomes.
- 1.15 That is the existential crisis that the Arc Spatial Framework needs to resolve before CPRE could consider taking a supportive position when the draft Framework emerges.

2. CPRE's agenda for the Arc Spatial Framework

Engagement and Scrutiny

- 2.1 The primary building block of successful planning outcomes is effective community engagement and scrutiny. CPRE want to see a much wider range of community voices influencing planning and benefitting from it. We have already seen this engagement and scrutiny eroded by the use of alternative consenting routes – permitted development and NSIP – which both create significant democratic deficit. CPRE's input to the wider planning reforms centres on the need to redress this deficit. Consequently, any spatial planning initiative across the Arc must enjoy the same level of engagement and scrutiny as a Local Plan. Considering the complexity involved it is difficult to see what the Spatial Framework could add that would not be more effectively planned and scrutinised at a county level, as exemplified by the Oxfordshire Plan 2050.
- 2.2 Further to this, if the Spatial Framework were to introduce an alternative consenting route for 'Arc projects', for example growth locations with pre-determined or relaxed development management expectations, this is something CPRE would strongly oppose in the absence of full local engagement and scrutiny.

Climate and Nature Emergencies

- 2.3 That planning must rise fully to the challenge of tackling the climate and nature emergencies is non-negotiable. CPRE wants to see the forthcoming NPPF review get to grips with the delivery of net-zero carbon, by:
- Requiring all new developments to demonstrate a net negative carbon footprint;

- Requiring all plans and infrastructure programmes to demonstrate how they will achieve a reduction in total road transport, not just the need to travel), in accordance with the findings of the Climate Change Committee that surface transport is the UK's largest single source of greenhouse gas emissions (Sixth Carbon Budget, 2020);
- Making climate action a key test of soundness in the examination of all development plans.

- 2.4 It is also evident that for many decades economic growth has come at a heavy price for nature. The principle of securing biodiversity net gains from new development is a significant step forward compared to the previous principle of minimising harm. In practice, however, the emerging arrangements for Biodiversity Net Gain (BNG) raise serious concerns in terms of the assessment methodology and how it is applied at strategic and site-specific levels. These concerns may be surmountable but are currently unresolved. In any case, BNG will only scratch the surface of what is needed for the economy to repay its ecological debts. Serious investment in regenerating nature is therefore essential.
- 2.5 If the Arc is to help tackle the climate and nature emergencies then it must commit to having a net negative carbon footprint, delivering absolute reductions in road transport, and producing a funded investment programme to implement the Arc Leaders' Group environment principles and, preferably, more ambitious programmes of nature regeneration.
- 2.6 Resilience to the climate-induced risks that are already rapidly emerging, especially around water stress, flooding and food security, is equally crucial, and we deal with them in our detailed comments.

Landscape and natural resources

- 2.7 The Arc Vision consultation already recognises the pressure on water supply and water quality within the Arc. This is a complex picture which includes flood risk, over-abstraction from aquifers, damage to aquifers caused by development, polluted run-off from industry and intensive agriculture, and severe risk to the chalk streams which are globally significant ecological assets. The importance of farmland within the Arc, especially in the Fens, for food security and a sustainable future for farming, must also be properly evaluated and invested in. Losing farmland to built development risks bringing short-term economic gains at great cost to long-term sustainability, and must be avoided wherever possible.
- 2.8 The role of planning is to shape places, and new development and infrastructure therefore need to benefit those places. Consequently, CPRE considers that the Spatial Framework should commit to measurably reducing flood risk, improving water quality, reducing pressure on water resources and restoring river ecology.
- 2.9 The majority of countryside across the Arc is not currently protected by Green Belt designation and those areas that remain under constant development pressure, and there is an urgent need to take a strategic approach to enhancing the visual quality, accessibility and environmental resilience of these highly stressed landscapes.

- 2.10 The character of the landscape does not respect local authority boundaries, and the countryside across the Arc area is important for its views, tranquillity, heritage, trees and hedgerows. It is adjacent to the Chilterns AONB, includes the proposed Great Ouse Valley AONB, currently under consideration by Natural England, and includes other designated and non-designated valued landscapes. Protecting and enhancing these characteristics is vital to the future of the Arc area, and strategic planning should be designed to ensure this, by having a strategic landscape character and capacity assessment as a key part of its evidence base.
- 2.11 Planning policy currently gives a degree of protection from harmful development to valued landscapes, though in recent years even the designated landscapes of AONBs and Green Belts have seen inappropriate schemes coming forward. (CPRE *Beauty still betrayed The state of our AONBs 2021*, April 2021; CPRE *Countryside next door: State of the Green Belt 2021*, Feb 2021; Glenigan for CPRE *Reclassification and development of Greenbelt Land*, July 2019,). Within the Arc the M1-A6 link road and Luton North urban extension is a particularly egregious example of this problem, impacting on the Chilterns AONB.
- 2.12 Meanwhile, for undesignated landscapes there is little protection, yet these are often the landscapes most used and enjoyed by people close to where they live, which have proved more than ever to be a vital resource for local communities during the pandemic. In particular, the high rate of large-scale commercial development along major road corridors has brought about rapid, cumulative landscape impact that has created unattractive environments that lack human scale and tend to have a high carbon footprint due to road-dependent access, lack of energy-efficient design standards and lack of green infrastructure.
- 2.13 Similarly, the support that local communities would wish to give in principle to provision of clean, renewable energy is being diminished in practice, by schemes that are industrialising the character of some rural landscapes, in some areas rapidly so. Meanwhile existing industrial landscapes, such as those characterised by warehousing and extensive surface car parking, are not being adequately harnessed for renewable energy. There is a clear win-win opportunity to invest in enhancing these industrial landscapes for green infrastructure, environmental quality and renewable energy, and to set development management policies accordingly, while also reducing development pressure on both protected and un-protected rural landscapes.

Sustainable Transport

- 2.14 New road-building is generally incompatible with the imperatives needed to tackle the climate emergency, and achieve the range of environmental and public health benefits arising from reducing car usage, such as increasing physical activity and reducing air pollution and noise. New roads also cause major damage to open countryside and encourage more road traffic, and would be likely to worsen the already serious problems of air pollution in Cambridge, Bedford, Northampton and Oxford. In this light, CPRE is delighted that the Bedfordshire to Oxford section of the Expressway project has been cancelled,

although other ‘road enhancement options’ remain on the table, including the Cambridgeshire section of the Expressway, and CPRE will be watching these closely. Indeed, we have recently heard that an Oxford to Milton Keynes link road is still proposed, though not of expressway standard; this will still be damaging and is therefore unacceptable.

- 2.15 Therefore, priority should be given to investment in existing infrastructure – particularly local public transport, walking and cycling, and integration of this local infrastructure with East-West Rail. This is a particularly important issue around Bedford and Cambridge. Co-location of jobs, homes and amenities, higher development densities and walkable neighbourhoods, and high-quality public transport for both urban and rural communities, are all essential for a healthy, sustainable, low-carbon future. This requires real strategic effort and CPRE would support the Arc in making a headline commitment to reducing car use through these measures.

Levelling Up

- 2.16 There are other parts of England, particularly in the Midlands and Northern regions, that have long experienced far lower investment in regeneration, public transport, environmental and social infrastructure than the South-East. There is a significant risk that the Arc will compound this problem, both by channelling an even larger share of national public investment into the South-East, and by introducing national planning policy interventions for the Arc for which there are no equivalents elsewhere in England. The government does not appear to have properly considered the impact of their emerging proposals for growth, migration, regeneration and infrastructure spending in these other regions. CPRE believes that this should be an essential part of any strategic planning process.
- 2.17 It must be noted that any significant employment growth in the Arc must inevitably be met by inward migration from other areas of the country. As we noted earlier, many of these areas have their own growth aspirations which inform their existing and emerging development plans, and which are themselves contingent on inward migration to their areas. There is a great risk that local economies within the Arc area will draw skills and workers away from those other areas where greater prosperity and opportunity is badly needed – the very opposite of levelling up.
- 2.18 This obvious tension in the aspirations for job growth and inward migration between areas inside and outside Arc is all the more problematic when we consider the general labour shortages that have recently become apparent in the UK ([UK employers face worst shortage of job candidates on record - REC | Reuters](#)). The shortages are across all skill levels. Given higher levels of economic inactivity in less affluent areas, any migration into the Arc away from less affluent areas is likely to deepen problems in those areas such as ageing population, lack of family support networks and resulting dependence on care services. In smaller rural communities, these impacts may be even worse. We are greatly concerned that the objective to boost the economy within the Arc generates a degree of hubris, and leads to serious socio-economic risks outside the Arc being overlooked.

Affordable housing

- 2.19 Within the Arc, as in many other places, open market housing is unaffordable to those households most in need of a suitable home. This is especially a problem for key workers and those in the ‘foundational economy’ (CPRE *“Redefining Affordability - A CPRE Briefing”*, July 2019, Affordable Housing Commission *“Defining and measuring housing affordability – an alternative approach”*, June 2019) who are essential to making places socially sustainable; and they make up a high proportion of commuters (*“The Spatial Interaction of Housing and Labour Markets: Commuting Flow Analysis of North West England”*, Stephen Hincks & Cecilia Wong, Centre for Urban Policy Studies, School of Environment and Development, University of Manchester, November 2014), so helping them meet their housing needs locally will help reduce car traffic.
- 2.20 In an area where growth levels and development land values are already high, the development priority must be meeting local needs, especially for affordable housing. The affordability problem cannot be solved by building a large surfeit of open market housing, because this will not reduce house prices and, indeed, attracting significant in-migration from Greater London and other areas is likely to push prices even higher. Therefore, building social rent homes is the most important ‘levelling up’ activity that is needed across the Arc area.
- 2.21 This will require a combination of changes in national planning policy and financial interventions to enable local authorities, housing associations and small-scale developers to acquire suitable sites without being priced out by large developers and land speculators.
- 2.22 Current affordable housing need accounts for around 50% of the housing requirement figures indicated by the standard method. But only 11% of new homes built in England are affordable, so affordability is getting worse. The case for exceeding the baseline growth rate for market housing has not been convincingly made, as it is clear that current policy is delivering market housing but not meeting affordable needs – a situation which should not continue.
- 2.23 CPRE considers that the Arc Spatial Framework should make a specific commitment to prioritising affordable housing, and that the wider review of NPPF – which should hopefully happen during the preparation of the Spatial Framework – should empower it to do so.
- 2.24 A focus on affordable tenures is especially crucial for rural communities. If the countryside in the Arc area is to have a sustainable future then reliance on open market housing to meet needs is destined to fail. Without homes that younger people and key workers can afford, villages increasingly become commuter dormitories. (National Housing Federation *“Affordable housing keeps villages alive”*, May 2010, CPRE *“CPRE Response to the Affordable Housing Commission: Call for Evidence”* April 2019).

3. CPRE’s Detailed Comments on the Consultation Document

Chapter 1 - Introduction

Para 1.2 Given that Buckinghamshire Council withdrew from the Arc, we must ask what becomes of a national policy instrument covering Buckinghamshire's geography? The Vale of Aylesbury Local Plan is nearing adoption and a Buckinghamshire-wide Development Plan is under way. Does Buckinghamshire's non-membership of the Arc mean that its plan will not be tested for compatibility with the Arc Spatial Framework under NPPF para 11d?

Para 1.7 references LEPs, but does not reference the Oxfordshire Plan 2050, the emerging Cambridge and South Cambridgeshire Local Plan or the Peterborough & Cambridgeshire Combined Authority which does not have a planning remit but is concerned with investment priorities, including the application of government funding to affordable housing provision, and which has full responsibility for transport. What is the relationship between these existing and emerging initiatives and the Arc?

Para 1.8 implies that if the Arc Spatial Framework, as an element of national policy, diverges from existing emerging development plans within the Arc, this will trigger NPPF para 11d and put those plans out of date. What are the implications of this for those development plans, and by consequence for Neighbourhood Plans? If the Arc Spatial Framework were to render recently or almost completed plans out-of-date, this would surely generate a groundswell of resentment and resistance to a top-down, centralised plan-making process – the opposite of localism. This highlights the need for the Arc Spatial Framework to be open to the kind of full and detailed scrutiny at local level that Regional planning guidance enjoyed.

Para 1.9 It is essential to set clear aims for what the Sustainability Appraisal (SA) should reveal and enable. Our three baseline expectations for the SA are that it will:

- Be based on the UN Sustainable Development Goals;
- Test alternative options, not just the preferred option;
- Test the realisation of policies (can they be implemented and monitored?), not just their stated intent.

Para 1.14 says there are 'lots of ways to develop a vision', which may be true, but the crucial issue is that the Arc Spatial Framework is a national policy intervention with a geographically ringfenced reach. As such, we need to ask:

- How will this intervention help to address challenges and objectives better than could otherwise be achieved through local strategies? This is not explained.
- Why does the Arc area warrant national policy intervention while other parts of England do not? There is no clear rationale for this.

Chapter 2 - Environment

Para 2.3 the Oxford to Cambridge Local Natural Capital Plan appears to be very much a work in progress with some maps prepared by organisations such as Natural Capital Solutions, the BCN Wildlife Trust and other organisations, but with no clear input to the Spatial Framework. Its Project Overview states "*It is a Defra Group-led project (cross-Defra, Natural England, Forestry Commission and Environment Agency), with a team hosted by the Environment Agency.*"

CPRE considers it essential that before there is any further progression of the Arc Spatial Framework, there must be at least a clear draft of the Oxford to Cambridge Local Natural Capital Plan, with clarity about its relationship to the Arc Leaders' Group Environmental Principles and to the plans of local nature partnerships - such as the "Doubling Nature" ambition of Natural Cambridgeshire.

In order to understand the policy interventions needed to address environmental challenges, development of the Spatial Framework must examine the historical trends and policy contexts that have led to these problems arising. For example:

- High car use and poor air quality has arisen due to dispersal of land uses, lack of investment in public transport and the relative fall in the cost of driving compared to public transport;
- The decline in the quality and connectedness of nature has arisen because only the most valued natural features have been protected, resulting in a few gems on an increasingly barren backcloth;
- Water stress has arisen because investment in water infrastructure has not kept pace with development, and because of a lack of demand reduction measures within existing and new development.

CPRE can also add to this list:

- Loss of tranquillity, mainly arising through road infrastructure and traffic growth;
- Landscape degradation, especially along major road corridors as a result of insensitive commercial developments.

In all these cases, it is important to regard these historical and ongoing trends as the results of active or passive policy interventions: they either arise directly from policy – e.g. allowing dispersed, road-based development; or indirectly from lack of policy – e.g. nature decline.

Looking in more detail at the high car use identified in para 2.3 and elsewhere in the Vision, this is a multi-faceted problem, not just for air quality:

- Congestion and physical separation have major impacts on local environmental quality and public health;
- Car dependence poses many problems, especially for those who lack ready access to a car due to age, health, disability or income;
- Car-dependent development locations lock in future, worsening problems;
- Transition to electric vehicles will partially address the air quality and carbon problems of road traffic, but this will only show impact towards the end of the Arc Spatial Framework period, and won't do anything about the other problems of traffic and car dependence.
- Absolute reduction in car use is therefore a policy imperative that must be rigorously pursued and enabled. Evidence points to overall reductions of between 10% and 60% being needed to adequately contribute to net zero carbon by 2050, and this scale of reduction would also have a wide range of other beneficial outcomes.

Therefore, we can easily see the types of policy interventions needed to tackle the environmental challenges:

- **Concentration and densification of development, with an emphasis on mixed-uses, walkable neighbourhoods and reusing brownfield land;**
- **Decoupling development from road traffic;**
- **Actively restoring nature;**
- **Actively enhancing and repairing the appearance and function of landscapes.**

We also need to return to the point that these challenges are more or less shared by all other areas of the country. Pressure on water resources, water quality and hydrology may be exceptional in requiring a suite of solutions across several counties. **Therefore, most solutions require changes to nationwide policy, rather than the creation of a sub-set of national policy for one geographical area.**

Para 2.5 In the context of our comments above, it is clear that **the Arc Vision's environmental commitments could be much more precise, i.e. setting policy to:**

- **Tackle head-on the key environmental challenges and the threats they pose to wellbeing;**
- **Achieve real, year-on-year reductions in road traffic and decouple economic productivity from road dependence;**
- **Densify built-up areas where land is not being used efficiently, and create active, walkable neighbourhoods;**
- **Create green, wild, accessible landscapes within and between settlements, along watercourses and major road corridors.**

Para 2.7 mentions the Sustainability Appraisal Scoping Report by name but fails to draw on many of the issues it raises. Given the complexity of these issues, we consider it should have been subject to a separate, earlier consultation exercise.

Para 2.8. See comments under Para 2.3 above.

Para 2.10. The "good things about the Arc's environment" claimed here are not specific to the Arc but apply to communities right across the country and indeed accessible green space and environmental sustainability have become much more important to residents of most communities during the pandemic.

Para 2.11 Increasing flood risk and the impact of development on the environment are major concerns right across the UK and the risk that development in the Arc will increase both of these hazards, both within the Arc and across neighbouring counties, needs to be clearly addressed.

'What do you think?'

Whilst many of the aspirations stated here are very welcome, they appear to be inherently incompatible with the Arc's development and growth aspirations, because those aspirations do not seem configured to actually deliver on key measures such as achieving net zero carbon and reducing water stress.

Landscape

CPRE fully supports the main theme expressed in paragraph 1.99 of the Sustainability Appraisal Scoping Report as follows:

“Land Use and Landscape

1.99 Protecting and enhancing landscape character and quality; protecting the ecosystem services of land and soil; using land and soil sustainably; considering natural capital approaches to land use; increasing the provision of and access to green infrastructure; and creating places and spaces which encourage sustainable and healthy lifestyles.”

However, while there is an attempt to identify significant landscapes in the paragraphs 1.3 – 1.10 of the Sustainability Appraisal Scoping Report, this is limited and makes no attempt to reference currently unprotected landscapes such as the chalk hills around Newmarket and Cambridge, the unspoilt countryside of north-east Bedfordshire, or the flood plains of the Thames, Nene, Great Ouse and Cam. No mention is made of pending landscape designations, such as the Great Ouse Valley AONB.

CPRE would like to see landscape properly inform the Spatial Framework. In particular:

- The scale, type and location of development should be shaped by landscape character and capacity, which must therefore be assessed and evidenced;
- There should be a multi-functional approach encompassing built and natural heritage, and the potential for landscapes in climate action and placemaking.

Greenspace

There is an evident policy gap in the protection and provision of green open space, between Green Belt and Local Green Space designations. The former is dependent on land fulfilling the specific purposes of Green Belt, while the latter is designed only to apply to tightly-drawn local spaces meeting precise criteria. This policy gap belies and belittles the huge benefits and value that people draw from green open spaces in urban, fringe and rural areas. Across the Arc, only a small proportion of land is within Green Belt, and there are very limited tools to protect and provide green open space elsewhere. Without new policies to enable this provision, development in non-Green Belt locations is likely to diminish, rather than improve, people’s access to green open space.

Table C1 of the SA Scoping Report identifies 33 Special Areas of Conservation (SAC), Special Protection Areas (SPA) and RAMSAR sites within 20km of the boundaries of the Arc and therefore at risk to damage by caused by it. These sites provide much needed greenspace as well as protection for wildlife. However, so do many County Wildlife Sites and undesignated areas owned by conservation bodies such as the National Trust, the Wildlife Trusts, the Woodland Trust and RSPB, none of which are mentioned.

Taking just one nationally important example, the Ouse Washes RAMSAR site; this site is already under threat from a combination of climate change-induced sea level rise and increased run-off from upstream development. Consequently, under the terms of the RAMSAR Convention, the Environment Agency has already been obliged to purchase areas of higher land bordering the existing site and to turn this into replacement wetland. Similar costly interventions may be needed at much greater scale as the impacts of climate change take effect.

The importance of greenspace on human physical and mental health is also well recognised, and a landmark study by the WHO in 2016, confirmed this (WHO “*Urban green spaces and health – A review of evidence*”, 2016). CPRE Cambridgeshire has produced local evidence on the topic (CPRE Cambridgeshire “*Green Spaces Matter, Really, Really Matter*”, Nov 2018). Consequently, we consider that a multi-functional green space strategy integrating wellbeing, nature and climate should be developed and should carry substantial weight in decision-making about projects and proposals for the Arc.

Climate and net zero

It is crucial that new development be used to reshape existing places to make them low carbon, resilient and thereby fit for purpose in our changing climate.

At the last count, 83% England’s local authorities have declared climate emergencies and made political commitments to tackle them. Yet CPRE is about to publish new analysis showing that local plans are being adopted now that lag far behind the climate action aspirations proclaimed by their councils’ climate emergency declarations. Three of the local plans we studied – South Oxfordshire, Bedford and Central Bedfordshire, fall within the Arc. All three councils have set local net-zero carbon targets of 2030, yet all three local plans have been adopted without strategic, quantified carbon reduction target. This is a wholly unacceptable situation.

A recent report for the Royal Town Planning Institute (RTPI) (*Net Zero Transport: the role of spatial and place-based solutions*, 2021) calculated the potential of land-use planning interventions to address net-zero in the transport sector. It found that if all new development were located and designed to have a negative carbon footprint, this would cancel out the baseline increases in emissions by 2030 that will otherwise result from a ‘do nothing’ situation. New development is happening right now that has a positive footprint, which means the impact on emissions is still heading in the wrong direction.

Importantly, fulfilling a negative footprint requirement for new development would also reduce the carbon emissions from housing and industrial sectors, not just from transport, and can include restorative measures such as tree and hedgerow planting alongside on-site renewables, energy efficiency and recycling the embodied carbon in previously developed land and buildings. All of this would produce real benefits for people, nature and local environmental quality, not just for carbon.

The RTPI report also found that a 14% reduction in nationwide transport emissions needs to be achieved by substituting car trips for other modes – walking, cycling and public transport. That must happen as well as the transition to electric vehicles, which is why we have to plan for significant reductions in car journeys.

We can therefore say that, at the very least, the planning system needs to set out two specific, quantified targets for actions that are within its scope to implement:

- All new development to demonstrate a net negative carbon footprint;
- All transport interventions to demonstrate a reduction in private car mileage.

CPRE will be campaigning for these requirements to be incorporated into the next revision of NPPF, but it is also essential that the Arc Vision makes an unequivocal commitment to them as strategic objectives. Should the Arc Vision fail to do so, then it will unfortunately be unfit for purpose in relation to the most pressing issue of our times and, we believe, would also be in contravention of the Climate Change Act 2008 as amended by Statutory Instrument in 2019.

Air quality

The Policy Paper published with the Environment Bill, entitled “10 March 2020: Air Quality Factsheet (part 4)” states:

“Exposure to air pollution can cause a range of health effects and is a particular threat to vulnerable groups, including the elderly, very young and those with existing health issues. Long term exposure affects us all, with long-term exposure to man-made air pollution in the UK known to shorten lifespans.”

The principal source of air pollution in the UK is road vehicles, mainly from engine exhausts but also from tyre and brake particulates. With combustion engine vehicle sales ending in 2030, we can only expect exhaust emission impacts to tail off at scale towards the very end of the period to 2050. Until then, any development which induces additional road traffic will inevitably worsen air pollution, which is already a major problem in parts of the Arc. Oxford, Bedford and Cambridge all have wide Air Quality Management Areas, and there are many localised AQMAs elsewhere, as described in the SA scoping report.

In addition to the wider climate and sustainability concerns, improving air quality is therefore a key reason why reducing road traffic, and making public and active travel the overriding priorities for transport and connectivity programmes, must be central to the Arc Vision. In short, the Spatial Framework must unequivocally work to reduce road traffic.

Water

Water issues pose serious environmental limits to further development in the Arc, especially in light of the climate and nature emergencies. Furthermore, chalk streams are of global ecological concern, because 85% of global chalk streams are in Southern England.

In Cambridgeshire there is a very complex picture which includes:

- chalk stream over-abstraction for supplying homes and businesses in South Cambridgeshire;
- chalk stream pollution by sewage;
- lack of alternative local supply;
- Fen aquifer abstraction for farm irrigation in summer;
- Low volumes in the Great Ouse/Cam system can affect water supplies to Essex;
- Rising sea level plus extra run-off means increasing flood risk to the Fens in winter.

Over abstraction from the chalk aquifer by Cambridge Water and Anglian Water are causing reduced water flows in all the Cam tributaries.

The Greater Cambridge Local Plan Strategic Spatial Options Assessment Integrated Water Management Study” (November 2020), prepared by Stantec for the Cambridge and South Cambridgeshire Shared Planning Service as part of the current review of the Local Plan, states:

“For water supply, over-abstraction of the Chalk aquifer is having a detrimental impact on environmental conditions, particularly during dry years that may become more frequent due to the impacts of climate change. None of the growth scenarios considered here offer the opportunity to mitigate these existing detrimental impacts. Even without any growth, significant environmental improvements are unlikely to be achievable until major new water supply infrastructure is operational, which is unlikely to occur before the mid-2030s.” Therefore, this analysis has focussed on a “no additional detriment” neutral position. To prevent any increase in abstraction and its associated detrimental environmental impacts, mitigation measures will be necessary. All stakeholders agree this should include ambitious targets for water efficiency in new development.”

Flooding is being exacerbated by climate change and is another major water issue which the Spatial Framework must address properly. Without further major investment in flood protection the agricultural productivity of the Fens will be at serious risk, and Cambridge City will also be at high risk of flooding.

As recognised by the SA Scoping Report, much of the greenfield land within the Arc is Grade 2 or Grade 3a agricultural land, while the Fens are predominantly Grade 1. Significant weight is given to protecting such land from development by the NPPF, paragraphs 170 and 171. As indicated above climate change is increasingly putting the Fens at risk, which makes it even more important to protect the remaining best and most versatile land outside the Fens. There is therefore a need for the Spatial Framework to take a strategic approach to the protection of farmland.

Chapter 3 - Sustainable Economic Growth

Para 3.2 The text about growth over the last 20 years implies an economic success story. But this is at odds with the environmental story of pressure and degradation. The principles of sustainable development have been well-established for 30 years now, and demand integrated progress on social, environmental and economic fronts. Therefore, 20 years of economic growth and environmental degradation is really the opposite of successful policy over that period. Either the growth has happened at a cost to the environment, or the growth has not adequately supported environmental progress. This represents a failure of public policy in recent decades and demands a sea change in the relationship between economy and environment. Further, there is a backlog of environmental damage that needs to be caught up before new growth can be deemed sustainable, so in fact a significant degree of ‘positive discrimination’ towards the environment is needed in the coming decades.

There is very little unemployment within the Arc, therefore any new employment created will necessarily be filled by inward migration from other, less prosperous regions, which

themselves have in-migration aspirations and could find their 'levelling up' objectives compromised by their intended workforce being drawn into the Arc area.

Comparing fig 3.2 (economic clusters) with fig 3.4 (employment by sector) implies a significant disconnect between the area's employment structure and the types of employment within clusters. In other words, the clusters appear as niche employment offers which are not reflected in overall sectoral trends. To better understand the economy and the policy interventions that may be required, we need to know:

- Are the job numbers in fig 3.4 FTEs? If not then they may mask shifts towards part-time and zero-hours jobs.
- Is there gender and age disaggregated data behind these headline numbers? It would be useful to understand demographic trends in work, and whether these present challenges that need addressing.

Para 3.4 - Public investment and policy support for business growth must be made contingent on decarbonisation. All sectors need transformational change; supporting 'green' businesses is welcome but is only a partial solution. For example, financial services and life sciences equally need to become zero carbon, so public policy needs to give them the regulatory and investment basis to do so.

It is also important not to underestimate the size of the rural economy. According to the National Farmers Union, (*"Delivering for Britain Food and farming in the Fens"*, April 2019) the value of the food chain in the Fens is £3.1 billion and the Fens produce 33% of England's fresh vegetables. Many other types of business also play a crucial part in thriving rural economies, including land stewardship, heritage, tourism and leisure, and 'foundational' activities such as childcare and building maintenance. If the Spatial Framework is to "make sure growth is felt by all communities" it must recognise that this goes far beyond providing selective growth clusters. Indeed, enhancing the Arc's natural capital, mitigating and adapting to climate change must also be regarded as important for business opportunity.

Para 3.7 - CPRE welcomes the recognition here of the importance of local high streets and local retail. This must be backed up by commitment to dense, walkable neighbourhoods, which provide the critical mass of activity to support local high streets in sustainable ways. There are also inclusivity benefits to this approach: for example, compact mixed-use neighbourhoods may offer potential for more mothers and more single parents to be economically active.

'What do you think?'

Education and training

There is a pressing need for training and skills in greening the economy, for example in retrofitting expertise within the construction industry.

Jobs and businesses

All business sectors must be supported to decarbonise, which means planning for the right types of buildings in the right locations to enable non-car-dependence and mixed-use, active neighbourhoods.

Chapter 4 - Connectivity and Infrastructure

Para 4.4 notes higher than average rates of driving to work, and substantially higher than average CO2 emissions for transport. Again, we may infer from this that higher rates of economic growth compared to other regions have run up a significant environmental debt, and we are keen to see how the Arc Spatial Framework will propose to repay this debt.

A crucial concern for whether or not the Arc Spatial Framework is a sound idea in principle is, can it deliver on net zero carbon in a more effective way than can be achieved by planning at a smaller geographical scale? If so, then there is a need to replicate spatial planning at this scale across the country? If not, then what value does the Arc Spatial Framework add?

The net zero target of 2040 for the Arc is laudable and welcome, and heightens the need for significant, absolute reductions in road traffic. Given the RTPI evidence of 14% reductions needing to be achieved nationally, and traffic levels in the Arc being higher than average, we would expect that achieving net zero for transport by 2040 would require road traffic volumes within the Arc to be around 20% less by 2040 than present. Assuming that the baseline 'do-nothing' scenario is actually an increase over that period, then the challenge is even greater and even more important.

Para 4.8 refers to commonly-held concerns about transport options in rural communities. CPRE's *'Every Village Every Hour'* report (2021) shows how a comprehensive bus network could end the inequality and social exclusion caused by the current car dependence of rural life. It is also essential to the decarbonisation of the transport sector, and would cost £2.7 billion for the whole of England – a fraction of the current roads programme budget. We would wish to see the Arc make a serious commitment to both urban and rural bus networks along these lines.

'What do you think?'

Infrastructure

Where is green and blue infrastructure here? It is mentioned elsewhere but not within the infrastructure commitments, which seems an alarming omission.

We consider that compact, active, walkable neighbourhoods should be regarded as a basic building block of sustainable development, and that addressing local connectivity within and between neighbourhoods is therefore a top priority.

New development

It's essential that new development makes existing places more sustainable, by making more efficient use of land and infrastructure and facilitating mixed-use, walkable neighbourhoods. This is why it's so important to focus on what can be achieved within existing settlements before looking to new settlements, enabling new development to help solve existing problems and reverse unsustainable trends.

Evidence from Transport for New Homes (*Garden Villages and Towns: Visions and Reality*, 2020) shows that recently-built new settlements are generally not fulfilling their promise to deliver sustainable movement. The vast majority are highly car-dependent, and in several cases the development value of the new settlement was used to finance a road scheme. This is wholly unacceptable in light of the need for substantial, absolute reductions in road traffic, and the Arc Spatial Framework must make clear that financing road infrastructure is not an acceptable function of development.

Getting around

There must be quantified targets for modal shift, road traffic reduction and reallocating existing road space to enable transformations in active travel and public transport, in both urban and rural areas.

There is no specific mention here of East-West Rail, which is a strange omission considering that it has so far been regarded as a central infrastructure project for the Arc.

Chapter 5 - Place-Making

As we discussed in response to the Environment chapter, it's important to consider the recent and historical trends and policy contexts that have given rise to the challenges currently facing place-making.

Para 5.5 - Regarding the quality and sustainability of new development, the Place Alliance *Housing Design Audit for England* (2019) found that three quarters of new housing developments are of mediocre or poor design. It is also important to be clear that the quality and sustainability of non-domestic development is equally crucial. The poor quality and environmental performance of recent new development is at least partially attributable to a lack of enforceable development expectations with the planning and Building Regulations system to ratchet up standards. The recent National Model Design Code makes some progress on this, but it only deals with housing and it has nowhere near the ambition needed to achieve zero-carbon development.

The shortage of affordable housing has largely arisen because of ongoing net reduction in affordable housing stock. In rural areas, Right to Buy currently has a replacement rate of 1 new social rent home being built for every 8 homes sold into the private market. Nationally, only 11% of new homes built in England are now at genuinely affordable social rents (*Affordable Housing Commission, Making housing affordable after Covid-19*, 2021). Meanwhile there is increasing concern about the impact of second homes and AirBnb letting on the availability of homes in many rural areas and tourist destinations. Further, there is strong evidence that increasing the supply of open market housing does not reduce house prices. Whilst there is a baseline need to continue supplying open market housing, this will not tackle affordability, and other measures are needed to do so.

Para 5.7 - It is encouraging that the consultation commits to a focus on brownfield development, but we must ask whether this will go beyond the existing requirements in NPPF. A major barrier to brownfield redevelopment is that policy or infrastructure constraints can easily delay their development. This may lead to their rejection as local plan allocations or falling outside the 5-year land supply, but due to the multiple benefits of

redeveloping those sites, we need interventions to bring them forward sooner, instead of recourse to greenfield sites.

Para 5.7 also says that housing need should be met in full, including for affordable housing. In light of the chronic undersupply of affordable housing, this should be the priority, but to do so requires a range of interventions, for example to make a substantially higher proportion of land supply available specifically for affordable schemes.

Para 5.11 voices a concern that rural areas could be left behind in terms of meeting housing needs. This is why an emphasis on affordable housing is so important for rural areas.

Para 5.12 refers to ‘joined up placemaking and planning’, but it is unclear what this means. In our view, it should be more explicit that a key policy objective for new development is to make places better and more sustainable than they are at present. That requires a significant shift away from a quantitative approach – ‘new housing is beneficial by default because it meets numerical need’ to a qualitative approach – ‘new housing is only beneficial if it addresses the needs of the area and makes places more sustainable’.

We note with concern that all the objectives set out in the placemaking section correspond closely with existing elements of NPPF. We must therefore ask whether the Arc Spatial Framework will in fact add anything to placemaking policy compared to existing national policy.

‘What do you think?’

Location of growth

We would add that new development should be located where it is best able to support and sustain public transport, active travel and walkable amenities.

If the next stage of the Spatial Framework is genuinely to offer options for consultation, then it is concerning that the government’s March 2020 announcement of development corporations for Milton Keynes, Bedford, St Neots and Cambourne implies preconceived locations for growth.

Homes in your area

A 2020 report for CPRE, English Rural Housing Association and Rural Services Network, *Rural Recovery and Revitalisation*, sees building affordable homes as a crucial contribution to local economies, and finds that “the current funding model for building affordable homes will be threatened by a likely collapse in developer contributions”. Without affordable homes, local economies cannot function. Prioritising genuinely affordable homes, both in policy and in implementation, is therefore absolutely crucial to place-making.

Design of new development and streets

This section does not really ask about the design of commercial developments and associated streets, with an implied assumption that this agenda is limited to residential development. This would be short-sighted. In particular, we need to see much greater creativity in bringing forward mixed-use schemes, and use of restrictions on permitted development rights to ensure that diversity of uses can be maintained through the planning

system. We also need to move rapidly away from the recent street forms of employment areas that reinforce car dependence.

Engagement

This section doesn't actually say anything about the policy status of the Arc Spatial Framework. It is also worrying that the timescale for consultation and iteration between the policy options (Spring 2022) and publication draft (Autumn 2022) is very tight and does not appear to provide for anything like the level of local scrutiny that we consider is needed for a strategy of this significance.

Implementation

This section appears very weak. It seems to propose that the Spatial Framework will be monitored on the basis of process - whether delivery plans have been prepared, viability assessed etc; rather than by monitoring crucial outcomes - such as reductions in carbon emissions and provision of affordable homes and public transport. One of the few specific proposals is to set up a new Arc Growth Body, but it is entirely unclear how this might relate to existing Growth Boards. Without genuinely outcome-focused monitoring, there will be no way to ensure that progress on key challenges is being made, or is in any way attributable to the Spatial Framework.

Comments on the Sustainability Scoping Report

For clarity we have focused our comments here on the content of Table 5.1 in the SA Scoping Report.

Land-use and landscape: Should include locally-valued landscapes, whether designated or not.

Communities: 'Opportunities' should be strengthened to say "prioritise the effective supply of genuinely affordable homes, especially for social rent".

Climate change: 'Opportunities' must be strengthened to say "ensure that carbon emissions are reduced year on year to achieve the national transition to net zero by 2050".

Transport: 'Opportunities' must be strengthened to "reduce total car travel".

Additional theme - Farming and sustainable agriculture: There is no reference to this other than under loss of soil and soil quality. The loss of farmland itself needs to be assessed and, under 'opportunities', sustainable agriculture should be encouraged.