STOP THE ARC GROUP
stopthearc.org

Comments on, and suggested responses to, the first official Oxford-Cambridge Spatial Framework consultation, open until October 12th 2021.

This document was created by the Stop the Arc Group (https://stopthearc.org) as a guide to filling in the official Government consultation on the Spatial Framework for the Ox-Cam Arc that you can find at https://www.gov.uk/government/consultations/creating-a-vision-for-the-oxford-cambridge-arc. The official website has three documents that should be read before completing the consultation questionnaire, the most important one of which is *"Creating a Vision for the Oxford-Cambridge Arc: Consultation"*. Extracts from this vision document are available in the official consultation by clicking on the 'i' icons of each major topic there*.

Layout of the present document: this present document repeats all the questions in the official consultation as a reminder of what is being asked. Major consultation sections are in bold, black large font; subsections in bold, blue font. Questions which need a tickbox, radio button or other multiple choice answer are given in italics; you respond to these directly online. Questions for the free-form text boxes are in bold red fonts below and here we give some brief background information of relevance to each major topic (in normal, red font). We then suggest some possible responses or topics in normal, black font. It is important that you do not simply 'cut and paste' these responses into the official consultation. Please use your own words or re-arrange the text of what is suggested here. Of course, please also add your own comments stimulated by the official documents or by anything on the Stop the Arc or other websites.
You are allowed only 500-character responses in each text box, so keep your comments short and to the point!

Creating the vision for the Arc

What is your positive vision for the Arc in the future?

Q1. *Tickbox. What kind of place could it be? What words come to mind?*

Q2. If you can, we would love you to tell us more about your vision for the Arc to 2050.

The consultation document begins with *"The Oxford-Cambridge Arc is a national economic priority area"* and talks about *"sustainable economic growth"*. That is clearly the Govt's vision for the Arc. Is this your vision for the area in which you live?

Specimen responses:
- The Arc will remain a green and pleasant land, not spoilt by over development driven by greedy developers.
- My vision for the Arc is organic growth of its existing communities, not a high-growth agenda determined by Whitehall and developers.

Q3. How do you feel overall about the future of the Arc? What are your hopes and fears?
The consultation document says *"The Spatial Framework will provide a national planning policy framework for the area of the Arc. This will help to better coordinate and provide a strategic direction for: Local Plans (i.e. for housing etc); Local Transport Plans; and Local Industrial Strategies developed by Local Enterprise Partnerships (LEPs)"*. The key words here are 'national planning policy framework' – in other words a top-down plan into which Local Plans will be obliged to fit. You elect your Local Councillors, but there is less democratic control over Local Transport Plans and none at all over the unelected LEPs.

Specimen responses:

- My main fear is loss of greenbelt and accessible Countryside for all to visit. The area could become a desert of development, ruining any interconnectivity for remaining wildlife.
- There will be endless, faceless executive housing estates, whilst inner cities still suffer from deprivation and lack of investment.
- Official documents say little or nothing about social housing. I fear that the social housing needs of poorly paid key workers will not be met.
- I fear that development led by unelected people (e.g. LEPs) will not serve the interests of the existing Arc communities.
- My hope is that the high growth agenda will be re-assessed in light of the demands on already over-stretched infrastructure (power, water, sewage, transport, health, school services).
- Can we get our existing infrastructure 'right' before we embark on yet more development?

Q4 *Tickbox. What do you think are the most important things that the spatial framework needs to do, as a strategic plan, to make the most of the area's unique potential for economic growth to 2050 and beyond?*

Q5 If there is anything you would like to add, we would love you to tell us.
The Arc does have the potential for economic growth, but this is no different from any other region of the country. No Government comparison has ever been made of the Ox-Cam Arc with other growth regions of the UK (e.g. the Midlands Engine or the Northern Powerhouse). You could therefore challenge both the assumption in this question and the consequences of Arc development.

Specimen responses:

- What comparisons have been made between the economic performance of the Arc and other growth areas in the UK, such as the Midlands Engine or the Northern Powerhouse?
- The Arc has been chosen because of the availability of green-field land for development close to London.
- Growth must not occur at the expense of the environment.
- How will investing in the already rich South-East help to level up the national economy, which is the most unequal in Europe?

Environment

Green Spaces, nature and biodiversity

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on:
Q1. *Choice. Making sure the natural environment is protected, restored and improved*
Q2. *Choice. Making sure the most is made of the natural environment and that all people can have access to it*
Q3. *Choice. Making sure new growth leaves the environment in a better state than before*

Q4. Anything else to add about your vision for green and blue spaces, nature and biodiversity

The consultation document says: *"The government wants to support growth in the Arc in a way that is sustainable – by improving the natural environment and making sure it is protected, and can recover from harm."* It boasts of the area's *"highly valued… Areas of Outstanding Natural Beauty"*. Why then has 85% of greenfield housing built in the South-East since 2017 been within AONBs? (CPRE figure). Areas that should be protected are not being protected at present. More development is likely to make matters even worse. Biodiversity Net Gain (essentially trading development in one place for

'improving nature' in others) is an idea still in its infancy in the UK and has been shown not to work in approximately two thirds of cases globally.

Specimen answers:
- I would like biodiversity to be enhanced by the creation of more natural parks, more green corridors and the protection of the Greenbelt.
- Reviews of net gain activities globally show that almost two thirds fail. Why do you think the Arc can do any better? Please explain how you are making sure that it will.
- Existing legislation protecting green spaces (e.g. AONBs, Green Belts) is not working at present. High growth will threaten them even more.
- There should not be a trade-off between development and nature (net gain) in which nature is only enhanced in one place if another is developed for housing etc. We should support and enhance nature with no development strings attached.
- John Lawton's 2010 'Making Space for Nature' asked for no-strings attached funding for Nature, a request he repeated 10 years later. How can the Government claim to protect Nature while ignoring this key request in a document that forms the basis for its own 25-year Environment Plan?
- How do you reconcile the fact that your Environmental Opportunity Areas ('areas that might offer offsetting opportunities to developers') are identical to the Wildlife Trusts' 'Core Areas of Existing High Value for Nature'? Why or how do you propose to offset on sites already of a very high value for Nature?

Climate change resilience and net zero

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on
Q1. *Choice Making sure new development helps achieve net zero carbon at an Arc level towards national net zero targets*
Q2. *Choice Making sure new development can respond to the current and future effects of climate change*

Q3 Anything else to add about your vision for climate change and/or the contribution to net zero
Here you may like to comment on the net zero carbon ambitions for both houses and transport (and possibly biomass burning for electricity generation). Carbon consumption is a more important measure of our carbon budgets than carbon production (the UK is the biggest net importer of carbon dioxide emissions *per capita* of all the G7 nations).
And, as an insult to all our intelligences, Anthony Breach, who frequently pronounces on commercial developments, wrote in a January 2021 blog *"CaMKOx are below the national average for CO2 emissions, which is why we should build 1.5m+ homes in them."* (CaMKOx was the original name for the Ox-Cam Arc). We stress this is <u>not</u> a Government view nor a Government target for houses, but it does illustrate the cavalier, opportunistic attitude of some developers to the Ox-Cam Arc. It's an area of relatively low density, close to London, and ripe for exploitation.

Specimen responses:
- Houses must have green heating, i.e ground, or air source heat pumps, solar panels, and must be properly insulated when built. This should not be a later, more expensive retro-fit.
- It is not enough simply to decarbonise our existing transport system. Public transport alternatives to private cars must be promoted and adopted (CPRE's 'Every Village, Every Hour' idea).
- Electricity generation should be properly carbon neutral and not from biomass burning.

- Every building and every vehicle should be net-zero as soon as possible, and carbon milestones should be established, with further development restricted if targets are not met. We should not wait until 2040 to 'do everything' in the final decade.
- Carbon budgets should include our 'imported' CO2 outputs (in the things we buy from abroad).
- Electrifying the vehicle fleet will require almost twice as much electricity as the present domestic electricity consumption across the Arc (EEH figures). How will this be generated and delivered?
- Better Public transport to remove car journeys; enhanced cycling and walking routes.
- Ensuring that housing is near to places of work and public services.
- Better broadband and mobile phone connectivity to allow continued remote working and reduce the number of journeys needed

Air Quality and Waste

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1. *Choice. Making sure new development helps to improve air quality within the Arc.*

Q2. *Choice. Taking a combined approach to air quality across the Arc.*

Q3. *Choice. Making better use of resources and managing waste.*

Q4. Anything else to add about your vision for air quality and waste?

The document talks about *"sustainable transport"* and *"enhancing green spaces and routes across the area."* as ways of improving air quality. What this does is to spread existing pollution across a wider area. Better still would be to reduce pollution at source.

Specimen responses:
- Proper re-cycling of plastics and other domestic waste.
- Promotion of zero-carbon public transport to reduce the problem at source.
- An holistic approach to designing new towns so that private transport is used much less (the 15 minute city).

Water

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1. *Choice. Promoting a combined approach to managing water across the Arc through protecting water resources, improving water quality and reducing the risk of flooding.*

Q2. *Choice. Making sure new development reduces existing flood risk and is resilient to future flooding*

Q3. *Choice. Improving water availability and cutting the risk of drought*

Q4. Anything else to add about your vision for water?

Water and sewage systems across the Arc are already under stress. Chalk aquifers provide 75% of domestic water in parts of the South-East and East regions and are running dry. Overflow sewage is pumped into such rivers when rainfall is high; penalties for doing this are too low and rarely enforced by the Environment Agency that has suffered severe staff cuts in recent years. Thus, the water companies can simply 'pay up' and keep on polluting as usual.

The Arc includes some of the driest areas in the UK. Cambridgeshire has only 600m rainfall per year, the same as that in some of the driest parts of Kenya in East Africa.

To all of these problems the regional water authorities offer engineering and other solutions: pumping water from elsewhere; reducing leaks; 'nudging' us to use less water each; building vast new reservoirs; or increasing water charges. But they have been offering some of these solutions for a very long time (e.g. reducing leakage in distribution pipes), with rather few results. How can we be sure they will deliver this time around?

Getting rid of sewage is predicted to be a more serious problem than providing clean water. You can pump water into a region, but no-one has yet considered pumping sewage out!

In 2020 all English river systems failed quality tests for pollution, and only 14% were judged to be in 'good' ecological condition.

Water supplies are in crisis all across the Arc, and Arc development will only make matters worse. We need to improve what we have at present before embarking on yet more development.

Specimen responses:
- The Arc is already short of water; chalk aquifers are running dry and sewage pollution is often un-checked. The water authorities should keep their previous promises (e.g. about reducing leaks) before we can believe their future promises for the Arc.
- Cambridgeshire is one of the driest areas in the UK (600mm rainfall each year), and the South-East receives less than 700mm of rainfall a year. Why is such a high level of development – requiring yet more water - being considered for these areas?
- Climate change will only make current water shortages worse; Summers will become drier and Winters wetter.
- How will sewage disposal across the Arc be improved so that excess is not dumped into streams and rivers?
- Water abstraction from chalk aquifers should be reduced, and chalk streams returned to their previous healthy state before ANY major new developments across the Arc are even considered.
- Existing legislation (e.g. on dumping raw sewage) should be enforced with higher fines for the water companies, and even higher fines for 'repeat offensives'.

Economy

This section of the document begins with the statement *"The government's priority for the Oxford-Cambridge Arc is sustainable economic growth."* No-one has yet defined 'sustainable economic growth' satisfactorily, and it is doubtful anyone can. No mention is made of Tim Jackson's Prosperity without Growth, or of Kate Raworth's Doughnut Economics. So, what are the limits to growth? In a finite world we simply cannot keep growing for ever.

Education and Training

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1*. Choice. Making sure the Arc keeps growing as a place of educational excellence, partnership and research.*

Q2*, Choice. Making sure the economic benefits of growth are felt by all communities within the Arc*

Q3. Anything else to add about your vision for education and training?

Many Arc supporters talk of the Arc levelling up both at a national level and within the Arc itself. Surely national levelling up is best achieved by investing in currently under-funded areas outside the South-East? And levelling up within the five Arc counties should not require a massive development project to achieve it.

Specimen responses:
- One can maintain excellence and share benefits without necessarily growing.
- We do not need the Arc to distribute economic benefits fairly. We can and should do it without the Arc.
- In general, on-average poorer areas are more equal than on-average richer areas. How will making the Arc even richer reduce inequality?

- About one quarter of children in both Oxford and Cambridge cities are living in household poverty, a problem made worse by historically high growth rates and high housing costs. We should address this problem first before embarking on yet more development.
- Inequality within the Arc reflects inequality across the nation. We must first balance up the inequality between regions. This requires a national policy. Local inequality can and should be addressed by Local Authorities (e.g. building or commissioning social housing).

Jobs and Businesses

The statistics given in this part of the document (GVA per head and employment area) are interesting. The West of England has a greater economic performance (GVA per head, Fig. 3.1) than the Arc, despite not having too many prestigious Universities. The areas of greatest employment in the Arc are Public Administration, Education and Health (one topic), Professional Real Estate and Business Services (one more), and Wholesale, Retail, Transport and Storage (again, one more; all Fig. 3.4) – hardly the High-Tech manufacturing that is often pushed as making the Arc specially deserving of investment.

A final question is 'Who is being invited to invest in the Arc'. The major Universities at either end were recently criticised for accepting funding from autocratic regimes. Do we want our development funded by nations with a dreadful human rights record?

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1*. Choice. Making sure that the Arc keeps growing as a place for business, science and technology, and innovation.*

Q2*. Choice. Making sure that existing industries keep growing within the Arc.*

Q3*. Choice. Making sure the Arc builds upon and grows its skills, expertise and capabilities.*

Q4*. Making sure that the right types of buildings are provided in the Arc so that businesses can keep growing as well as supporting the green economy*

Q5. Anything else to add about your vision for jobs and businesses?

Although Covid is causing us to re-assess how we live and how we work, some jobs cannot be done 'remotely'. The scientist at the bench or the cook in the kitchen will still have to travel to their usual work-places.

Specimen responses:
- I do not accept that the Arc has to 'grow' in all the areas mentioned in this section. No mention is made of circular economies or of prosperity without growth. Why not, since we live in a finite world?
- Only a relatively small proportion of employment in the Arc (probably less than 20%) can be classified as high-tech manufacturing. Other areas of the UK have the same or higher percentages of high-tech jobs over a wider region. Why isn't the Arc there instead?
- The Arc was justified on the basis of its high-tech manufacturing base, yet the Consultation document (Fig. 3.4) shows that such jobs are in the minority across the Arc. The Arc is therefore not special compared with any other region of the UK, and many of these are more in need of Arc-type investment.
- The pandemic has shown us that some jobs can be done from anywhere. New more flexible workplace requirements which encourage collaboration and innovation will become the norm for some in the future, and they will not need to be 9-5 in an office.
- Current office space should be reviewed and repurposed for housing, to stop development sprawl. But it should be subjected to all the usual planning laws for domestic dwellings. Permitted developments free of such laws have produced dwellings described as no better than rabbit hutches, with small rooms and some even without natural lighting.

- Empty offices and shops in town centres should not all be converted to dwellings, thus hollowing out the towns' commercial centres. We need the right mix of dwellings and shops for thriving town centres.
- Which nations are being invited to invest in the Arc? Does this list include autocratic regimes with poor human rights records (e.g. China, the UAE). If so, why?
- I do not want my Arc funded by autocratic regimes with a proven record of forced sterilisation and forced abortion of its ethnic minority population.

Connectivity and infrastructure

Infrastructure
Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on
Q1. *Choice. Making sure planning takes a combined approach to new development by providing the infrastructure and services required at the right time to support growth*
Q2. *Choice. Making sure new development makes the most of existing resources.*
Q3. *Choice. Making sure that digital infrastructure is put in at the same time as other development takes place.*

Q4. Anything else to add about your vision for infrastructure?
Infrastructure in this context is everything except housing – roads, railways, transport services (e.g. buses and trains), sport and leisure facilities, schools, clinics, community centres, hospitals, water supplies, waste and sewage disposal, power supplies, internet connectivity etc. etc. Commercial house-builders do not provide infrastructure with their houses and, at best, are charged only minimally to contribute to such infrastructure. The bulk of costs is therefore borne by the tax-payers – all of us, including businesses that contribute to the national Treasury. Many local authorities are currently in 'infrastructure deficit' (for example Oxfordshire's infrastructure funding deficit is about £6 billion, approximately 60% of which is for transport, out of a total requirement of £9 billion) and will rely on the generosity of the Treasury to fund it. These deficits are for existing needs, not those of the one million or so extra houses and the 2+ million more people of the Ox-Cam Arc plans.

Specimen responses:
- We should first solve the problem of existing infrastructure deficits (e.g. Oxfordshire's estimated £6 billion infrastructure funding shortfall) before embarking on yet more development.
- Infrastructure must be provided before all Expansion; MK MP Iain Stewart's 'I' before 'E'. Too often the houses are built and then the infrastructure is simply 'forgotten' or neglected.
- New settlements should be at high density around transport hubs, thus not wasting green-field land, or farmland for growing food, and should also reduce car use.
- Local employment should accompany all major new settlement schemes, reducing commuting journey distances and times.
- Infrastructure must always include digital connectivity.

New Development
Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on
Q1. *Choice. Making sure growth within the Arc is placed around areas with better transport links.*
Q2. *Choice. Making sure new development cuts down the need to travel around the local area.*
Q3. *Choice. Making sure new developments reduce existing a future infrastructure demand and resources used.*

Q4. *Choice. Making sure sustainable transport principles are included in the design of new developments*

Q5 Anything else to add about new developments in the context of connectivity and infrastructure

This section refers to new settlements rather than the expansion of existing ones. Many responses here can be similar to those above. The legislation for new settlements is different from that for existing ones and will probably be equivalent to that of Nationally Significant Infrastructure Projects (NSIPs) that give central Government considerable powers over Local Authorities and Communities. Used wisely these could benefit (e.g. capturing the uplift in land values associated with development); used badly they could result in a developmental free-for-all (e.g. if commercial builders are allowed to capitalise on their considerable land bank resources). Current legislation favours developers rather than communities. When Milton Keynes was built, only 1% of the price of a house was for the land on which that house was built. The average for the commercial house-building sector today is 70%. Houses are expensive because building land prices have been allowed to soar. Since the 1980s, Local Authorities have sold off, to private developers, the equivalent of 10% of the total UK land area that was publicly owned (land worth an estimated £400 billion). Publicly owned land they still own could be used for cheaper social housing without any reduction in housing quality.

Specimen responses:
- The key to successful new developments is capturing land-value uplift for the community, not for private land-owners' profit. Land identified for new communities must be purchased at 'current use' values, not 'hope' values. All successful community development depends on this.
- All new communities should be built on land bought at 'current use' not 'hope' value.
- Infrastructure must be provided before all Expansion; MK MP Iain Stewart's 'I' before 'E'. Too often the houses are built and then the infrastructure is simply 'forgotten' or neglected.
- New settlements should be at high density around transport hubs, thus not wasting green-field land, or farmland for growing food, and should also reduce car use.
- All new settlements must be zero-carbon from the moment they are built.
- The Arc should be an exemplar of social house building that is truly affordable by the least well-off in society. This could use the publicly-owned land still under the control of Local Authorities (approx.. 10% of the total UK land area).

Getting around
Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on
Q1. *Choice. Creating better transport connections across the Arc and making sure they are provided in a way which supports sustainable new growth.*
Q2. *Choice. Making sure there are more opportunities for active travel such as walking and cycling across the Arc.*
Q3. *Choice. Making sure there is the right form of public transport in the right areas across the Arc and can be used by all travellers, including people with any particular needs.*
Q4. *Choice. Cutting down on the impact of cars and other private vehicles within the Arc.*
Q5. Anything else to add about your vision of getting around?
Public transport is viable only if it serves high density communities to provide sufficient passenger numbers to keep it profitable. Post-Covid, our car use has returned to higher than before the pandemic, but use of public transport is still significantly less. People have bought cars to avoid travelling on buses and trains. We must reverse that trend to avoid congestion, pollution and yet more CO2 output from our transport system, the biggest net contributor of any energy sector to our national CO2 output.

Specimen responses:
- Public Transport and cycling/walking must be at the forefront of any development.
- There must be a move to take cars and freight off the road and onto electrified rail links.
- Costs of public transport must be reduced as a public good. Transport fares have increased considerably in recent years (at higher than inflation rates) while fuel duty has remained constant; this encourages the use of private cars.
- The Arc is a relatively rural area with a higher-than-average English regional car use. Public transport must include a properly funded bus system – CPRE's 'Every Village, Every Hour' model.
- The EEH has shown that all potential connectivity corridors adversely affect wildlife, AONBs, water supplies the historic environment etc. etc. How can you square your transport and environmental aspirations?

Placemaking

Location of growth

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on
Q1. *Choice. Making sure new developments are built in the most sustainable locations, for the environment, the economy and communities.*

Q2. Anything else to add about your vision for location of growth

This is a 'big-picture' question about the location of new developments and the use, or change of use, of existing ones. Development can be around existing centres (the risk here is that the infrastructure of such centres – especially villages - may be stretched to breaking point) or can be on new, probably green-field sites. Don't forget that one of the major reasons for developing road corridors is to open up new sites for houses.
Official documents have a definition of 'sustainability' that most would challenge. Clearly continuous growth through time is not sustainable on a finite planet. So, when is growth deemed 'not sustainable'; and by whom? It's a question we do not want to leave to the developers to answer for us.

Specimen responses:
- The Arc needs to define sustainability correctly, for example using the Dasgupta definition of wealth = stock + yield (of all three components of wealth, i.e. people, the environment, the economy). Only when wealth is maintained, or is increasing, can we talk of sustainability.
- Development and transport systems threaten nature. We cannot develop and save the environment at the same time. How will the Arc establish what trade-offs apply here?
- The use of existing office space must be reviewed, because offices are used less and less.
- Development sites must be reviewed and consolidated with designated working areas with good access to public transport.
- Excess office space in non-designated areas could then be used for housing, to reduce the expansion of cities and developments on greenfield sites.
- Brownfield land should always be used first for development
- Land value capture for the residents and not for developers must be part of all new settlement schemes. It was probably the single most important ingredient in the success of

Milton Keynes. Reinstate legislation to purchase large-site development land at 'present use' rather than 'hope' value.

Homes in your area

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1. *Choice. Ensuring the right types of houses are delivered in the right locations to meet the needs of both renters and buyers*

Q2. *Choice. Increasing the amount and availability of affordable homes within the Arc.*

Q3. Anything else to add about your vision for homes in your area?

This is a huge and very important question. The Government has stopped talking about the one million house target for the Arc but still, in its Economic Prospectus for the Arc, and elsewhere, it pushes the economic benefits for the Arc (to attract inward investors) that – by its own calculations – requires those one million houses, approximately one quarter of which are ear-marked for London commuters. So, we need to challenge all Arc statements on the housing requirements for any Arc ambition. Not talking about it doesn't mean such a target no longer exists.

You'll have noticed that the consultation document doesn't give any figures at all for new houses, extra jobs or economic performance of the Arc. Do you think they are approaching developers and investors with absolutely none of this information? How can investors be expected to invest in the Arc without any promise of its economic performance? Of course the Government has housing figures and economic aspirations for the Arc! So why isn't it being honest with us now in this consultation?

Specimen responses:

- The Government must be honest about the housing targets for the Arc. It has stopped talking about the one million houses figure (NIC, Partnering for Prosperity Report) but still offers to investors and others the economic benefits that require those million houses to deliver.
- If it's not a million new houses, how many is it, and what economic studies have been carried out to justify this new figure?
- 'Affordable housing' is a misnomer which should be dropped. Social housing is required.
- 'Affordable' according to the Govt. definition simply means 80% of current house prices or rents. By no stretch are most houses in the Arc affordable.
- Developers' profits should either be capped or be part of gain share agreements with local councils.
- Councils should build social housing or encourage Housing Associations to do so, on publicly owned land wherever possible, to keep unit costs down.
- The right-to-buy council houses in areas of great housing need should be abolished.
- Housebuilders drip-feed new houses onto the market to maintain prices (Letwin Review). 'Land-banking' achieves the same objective. Both could be stopped by setting a time limit on building-out approved sites.
- Please reveal to us the 'offer' the Government is making to external investors into the Arc plans. What is their promised return on investment, based on what predicted economic performance?

Design of new developments and Streets

Thinking about your vision for the future of the area, how important is it that the Spatial Framework focuses on

Q1. *Choice. Making sure a coordinated approach is taken to the design and delivery of new developments to ensure they are supported by new and existing infrastructure.*

Q2. *Choice. Making sure the environment and sustainability is at the heart of new developments.*

Q3. *Choice. Making sure there is the right mix of uses in new developments to help make high quality and thriving new places.*
Q4. *Choice. Making sure new developments help support healthy lifestyles for existing and future communities*
Q5. *Choice. Making sure new developments promote resilience to climate change.*

Q6.   Anything else to add about your vision for the design of new developments and streets
You may want to use responses to previous questions here, too. Infrastructure and the 'right sort' of houses are key features, and the Building Better Building Beautiful Commission's recommendations are filtering through into design codes for new buildings, part of the new Planning White Paper legislation.

Specimen responses:
- Infrastructure before expansion – 'I' before 'E' in all major new developments.
- Urban regeneration of brownfield sites must be a priority.
- Putting the environment at the heart of new developments does not mean making what would have been a football pitch into a wild-flower meadow (to achieve net gain requirements). Recreational areas must not be used for other purposes.
- Large sites should be built out by a variety of developers (Letwin Report recommendation) so that a variety of house styles is delivered more quickly than by a single developer offering a limited range house styles.
- There should be a requirement for a fixed percentage of social housing (not 'affordable' ones) in areas of greatest need, as indicated by the ratio of house prices to wages. Housing Associations and self-build schemes may also help here.

Delivering the Spatial framework

Engaging communities
Q1. *Checkbox. How can government engage with the public better? Rank these by dragging the boxes in priority order or by assigning an order number in the drop-down (1 = highest priority)*
Q2. *Yes/No. Before this consultation I was familiar with the area known as the Oxford-Cambridge Arc.*

Q3. Do you have anything else to add on engaging communities?
You may like to question here why this, the very first public consultation on Arc plans, comes at least 6 years after the Ox-Cam Arc plan was officially made public (and even longer after it was first created in Whitehall). What has been happening in those 6 years? It is pretty clear that the Government has been tempting investors with offers of spectacular investment rewards – offers that must have included far more details about its plans than you will see in this consultation. Why is this? We are talking about the future of c. 3.7 million people who live in the Arc at present. It has been freely admitted in public webinars that this is a Whitehall Plan, of personal interest to the Prime Minister and Chancellor. Should our future be decided in Whitehall rather than locally?
We not only want more government engagement with us, we want more honest engagement. Tell us what are the plans for our five counties?

Have you also noticed that on no occasion in this consultation do you have the chance to say you do NOT want the Arc? If democracy means anything, it should mean that affected people can say 'No' to these Ox-Cam Arc Government plans decided in secrecy and behind closed doors for the last 6+ years.

Specimen responses:
- Community engagement in fundamental and to date has been completely lacking.
- There also need to be transparency in plans and who is going to profit from this development.
- Where and how can the affected communities say 'No' to the Arc plans?

- Where and how can communities determine the scale of Arc plans?
- Before this consultation I knew nothing about the Arc. Reading your consultation documents I still know very little. What is the scale of your ambition for the Arc (jobs, people, houses)?
- If your ambition for the Arc is no greater than for any other region of the country, why are you concentrating all this attention on the Ox-Cam Arc?
- If your ambitions are greater than for anywhere else in the country, what evidence do you have that this is the best place for all the investments you seek?

Our commitment to data and evidence

Q1. *Choice. To what extent do you agree with our proposed approach on data and evidence?*

Q2. Do you have anything else to add on data, evidence and digital tools?
The Government appears to have adopted a digital approach to this consultation to find out the views of a younger demographic than the more traditional consultation route (e.g. paper-based or village-hall meeting displays). It's not clear that this is actually working. For example there is a much lower take-up in younger people now given equal access to Covid vaccinations. Perhaps they are less interested in such things? A digital-only consultation disenfranchises other segments of the population without access to smart-phones or the internet (e.g. poorer families, older people in general).

Specimen responses:
- I hope you will make clear in your analysis the responses by demographic and other population segment (e.g. young/old; living inside or outside the Arc at present; richer/poorer).
- I welcome your offer of data sharing. This should include all information (e.g. sites/housing numbers within current Local Plans; and sites considered for major new developments) and not just some of it.
- Will you forbid Non-Disclosure Agreements (NDAs) on all aspects of Arc development? If not, why not?
- The consultation commitment talks about *"making* (planning) *processes more reliant on data rather than documents"*. Documents are a structured way of presenting data. Data, on their own, are often meaningless and require metadata (effectively documents) to explain them.

How we will monitor and deliver the Framework
This section of the document talks about how the spatial plan will be created (across Government and with Local Partners) and prioritised, and how the infrastructure needs will be identified and delivered. Since none of this information is in the present document this is a promise for the future. Key decision takers here are the Local Partners that were very precisely defined in 2019 and specifically exclude all the nature partnerships of any sort. How can you create a Spatial Plan that claims to protect the environment without the expertise of such groups?
The document also talks about *"propos(ing) potential investment opportunities",* but to whom? The MHCLG's Oxford to Cambridge Arc portfolio Director, talking about the yet-to-be-appointed Chair of the (highest level) Arc Growth Body, stated that the successful candidate will need
"......the gravitas to fly over to Beijing and have the conversations that we may need for that global engagement …" No other capital city or country was mentioned in that sentence; not Europe, not the USA. Do we really want autocratic China involved in Arc development?

Q1. *Choice. To what extent do you agree with our proposed approach on delivery and funding?*

Q2. Do you have anything else to add on delivery and funding

Specimen responses:
- The document tells us only how the spatial plan will be created by Government and Local partners and how its infrastructure requirements will be determined. Since no information is given on any of these topics we cannot possibly comment.
- 'Local partners' are defined precisely in the May 2019 'Joint Declaration' document (section 1.3) and include only Local Authority representatives, the Local Enterprise Partnerships and the Arc Universities Group. If the Environment is key to your ambitions why aren't the eNGOs (the Wildlife Trusts, The Woodland Trust, CPRE, the RSPB and others) included in your Local Partner group?
- 'Local Partners' must include the Wildlife Trusts and others. Presently they do not. Why?
- MHCLG's Kris Krasnowski said in public that the Chair of the Arc Growth Body will need *"......the gravitas to fly over to Beijing and have the conversations that we may need for that global engagement …"*. The Arc, home to two world-famous Universities, should not be funded by such an autocratic and repressive regime.

Q3. *Choice. To what extent do you agree with our proposed approach on monitoring and evaluation?*

Q4. Do you have anything else to add on monitoring and evaluation?

The document promises to monitor developments as they happen, and that will result in social, economic and environmental changes. But studies already carried out show that developing the transport network will harm all aspects of the environment.

Specimen responses:
- Transport studies already carried out (by EEH) have shown that developing all the proposed transport corridors across the Arc will adversely affect nature, water and air resources. How will you balance the certain destruction of nature with any particular level of development?
- Who decides where the balance is struck between nature and Arc development, specifically EEH's connectivity corridors, all of which are predicted to harm nature and threaten water and healthy air supplies?

Scoping report for Sustainability Appraisal

Scoping report for Sustainability Appraisal
A Scoping Report sets out key understandings of the area under study (here given in both the Scoping document itself and, in more detail in the Annex document), indicates the ambitions of any proposed development plan and points out any potential areas of conflict that should be considered in developing the plan proper (Scoping document).
There are a couple of curious facts in the Scoping document. Fig. 4.4 shows that a Local Natural Capital assessment of the Arc has concluded that the Arc Natural Capital stock is worth £2.3 billion and that the ecosystem services this stock provides are worth £2.3 billion per annum. Thus we apparently have a natural capital stock giving a 100% yield per year. If only economic yields were this good! It seems pretty clear that the true value of the stock has been grossly under-estimated. The danger here is that putting our ecosystem services into an economic framework runs the risk of life-support systems being destroyed because the total economic returns on investments in the Arc are greater in absolute terms than those on the natural capital stock.
The second curious fact in this document is Fig. 4.6 which includes the information that the total population across the Arc is expected to be 3.88 million in 2023, 4.02 million in 2033 and 4.13 million in 2043 (it was approx. 3.77 in 2018). This is a 6.4 % increase over the 20-year period 2023 to 2043 or a 9.5% increase since 2018. These projections are apparently based on ONS predictions for the average increase in the UK population. The document, clearly drawing on these figures, states *"The Arc has a total population of approximately 3.7 million people; this has grown from approximately 2.8 million in 1991 and is expected to increase to close to 4 million by 2043."*…… but we know this is just

Q1. *Choice. To what extent do you agree with the key strategic issues and opportunities in the proposed scope for the Sustainability Appraisal of the Spatial framework?*

Q2. Are there any other strategic issues and/or opportunities that need to be considered in the appraisal?

Specimen responses:

- The Scoping document suggests the Arc's natural capital is worth only £2.3 billion and provides ecosystem services worth £2.3 billion per annum. Such a low capital worth could mean that natural capital is lost to economic activities producing more in absolute returns per year than the natural capital. How will you use such a flawed economic framework to protect the natural environment, our life support system?
- The following scoping document statement will only be correct without any boosted development: *"The Arc has a total population of approximately 3.7 million people; this has grown from approximately 2.8 million in 1991 and is expected to increase to close to 4 million by 2043."* The population will be nearer to 6 million people according to the transformational scenario favoured by the Government. Why is your document being totally dishonest about the likely increase in the Arc population?
- If the Arc population will grow by only the ONS predicted UK-wide average figure, why is so much attention being given to Arc development?

Q3. Are you aware of any additional strategic data that we should take into account as part of the sustainability appraisal?

Specimen responses:

- You need to get your population projections correct before you can carry out a proper sustainability appraisal.
- What is the real projected increase in the Arc population under the high-growth transformational scenario favoured by the Government and developers?
- Higher than average growth in one area of the country (the Arc) will draw labour from other areas of the country (regions outside the South-East) and thus threaten the economic growth of those regions. What do MPs in the Midlands Engine and Northern Powerhouse regions think of Ox-Cam Arc plans?

Q4. Are you aware of any additional plans or programmes you think will be important to consider within the sustainability appraisal?

Specimen responses:

- Other areas of the country also want boosted development (the Midlands Engine and the Northern Powerhouse) requiring external investment and a strong labour force.
- How will the limited increase in the nation's labour force be shared between different regions of the country, each wanting boosted growth?

Q5. *Choice. To what extent do you agree with our approach to the Sustainability Appraisal?*

Comments, questions etc. to: stopthearc@gmail.com