

## Appendix 1



### **CREATING A VISION FOR THE OXFORD-CAMBRIDGE ARC JULY – OCTOBER 2021 CONSULTATION FUTURE OXFORDSHIRE PARTNERSHIP (FORMERLY THE OXFORDSHIRE GROWTH BOARD)**

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Thank you for giving us the opportunity to comment on the Arc Vision Consultation Document and Sustainability Appraisal. This submission is on behalf of the Future Oxfordshire Partnership (formerly known as the Oxfordshire Growth Board). The Future Oxfordshire Partnership is a collaboration between the 6 local authorities in Oxfordshire:

- Cherwell District Council
- Oxford City Council
- Oxfordshire County Council
- South Oxfordshire District Council
- Vale of the White Horse District Council
- West Oxfordshire District Council

It sits as a joint committee of the councils and brings key stakeholders together including the Oxfordshire Local Enterprise Partnership, Oxford and Oxford Brookes Universities, the NHS, Homes England and the Environment Agency. We are pleased to be delivering the Oxfordshire Housing & Growth Deal and as part of that the Oxfordshire Plan 2050. The Oxfordshire Plan 2050 remains one of the few statutory strategic plans in the country and it is this strategic planning relationship managed through our partnership, together with our [Strategic Vision for Oxfordshire](#),<sup>1</sup> that forms the basis for most of our comments. Many of our partnership's members, such as individual councils, will be writing separately in their own capacity and nothing within this submission will over-ride those comments.

The pattern of consultation from Government is now standard and in the form of a comprehensive series of questions. We set out below responses to each of the question themes, reflecting the structure of the consultation document.

#### **1. Creating a Vision for the Oxford-Cambridge Arc**

This year, each of Oxfordshire's councils adopted a highly ambitious pathway for long-term change towards a more sustainable future, as set out in the Oxfordshire Strategic Vision. Prepared by the Future Oxfordshire Partnership, our Vision is designed to be overarching and cross-cutting to inform a range of local and regional plans, strategies and programmes, including the Arc Vision. Enhanced wellbeing sits at the heart of our ambition. We want Oxfordshire's people, places and environment to thrive so that we can secure the best possible future for our residents. Our ambition is bold, collaborative and inclusive, striving to deliver real and lasting change in ways that build resilience and enhance environmental, social, and

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<sup>1</sup> Oxfordshire Strategic Vision, 2021. Available at: <https://www.oxfordshiregrowthboard.org/wp-content/uploads/2021/05/Strategic-Vision-full-document.pdf>

economic wellbeing. As asked by the consultation document, we would expect the broad themes and ambitions of our vision to be reflected in the Arc vision.

The strongest theme to emerge from our own public engagement process for our Strategic Vision concerned the importance of planning for a sustainable future in which Oxfordshire reaches carbon neutrality as soon as possible, while simultaneously making changes to how we live and work in order to protect and enhance the natural environment, reduce waste and increase biodiversity. Secondary to that was the need to tackle economic, health and social inequalities, which despite misconceptions, are significant and persistent across Oxfordshire and the Arc.

Collaboration to date through the Arc Leadership Group has provided a strong voice for the region, and there is good alignment between local leaders about the kind of place we want the Arc to be. We believe our Vision for Oxfordshire is broadly compatible with wider aspirations held by other local leaders across the Arc, and that HM Government should continue to make use of our collaboration to inform thinking.

We recognise HM Government's ambition to plan for growth in a way that improves the area for all residents, and protects and enhances the natural environment, whilst combatting and building resilience to climate change. This broadly reflects how we intend to manage good growth in Oxfordshire, as set out in our Strategic Vision. However, we would challenge HM Government to go further to define what it means by growth and to adopt a set of principles and standards to guide growth. We have defined what good growth means for Oxfordshire to ensure that our residents and the natural environment continue to take priority. Good growth in Oxfordshire will:

- Enhance the historic and natural environment
- Support a diverse high-value economy
- Be high-quality and resilient to change
- Embrace innovation and technology
- Be sustainable, clean and green
- Be healthy and inclusive

The Arc Vision Consultation Document is clear that the Vision will be central to shaping the proposed Spatial Framework. We would expect the Arc Spatial Framework, guided by the vision, to be fully compliant with, and complementary to, the local and national policy direction with respect to carbon reduction and environmental enhancement. Specifically, the Vision and Spatial Framework should include a commitment to empower local leaders to act decisively and deliver on their commitments in this area. As recommended by the Committee on Climate change, UK pathfinder areas such as the Arc should be supported to go faster, innovate, and develop solutions, and where local authorities are putting in place ambitious and well-evidenced plans (see the Oxfordshire Plan 2050 and the Pathways to a Zero Carbon Oxfordshire Report from Oxford University), we should be allowed to go ahead of national standards.

## **2. The Environment**

In Oxfordshire, we want to have achieved carbon neutral status by 2040, and be accelerating towards a carbon negative future, removing more carbon than we emit each year. We want to be the first generation to leave the natural environment in a

better state than that in which it was found, with a natural environment that is more biodiverse, resilient, and adaptable to change.

We note that the HM Government consultation document identifies that “*environmental sustainability is a priority for all groups we have spoken to so far*” and we would want to see that reflected in the Vision. Each of Oxfordshire’s councils has declared or acknowledged the climate emergency, and we have set very ambitious targets to reduce our organisational and district area emissions. Whilst we are encouraged to see that the environment has been given due prominence within the consultation materials, we would emphasise that ambitions for the natural environment must be an integral consideration that permeates all other ‘policy pillars’ identified in the document. It cannot be a standalone stream of work or thematic consideration, but an underlaying and fundamental part of economic, placemaking and connectivity workstreams.

We believe the Arc Environment Principles, produced by the Arc Leadership Group and endorsed by all of Oxfordshire’s councils, provide a strong framework for our collective environmental ambitions, and we would strongly encourage HM Government to give these principles due weight in the Vision and Spatial Framework.

We note with regret that environmental quality across the region has been in significant decline for many decades, and the Arc Vision should seek to address this head on, aiming for a wholesale restoration and enhancement of the natural environment for the benefit of local people and wildlife. Where possible, the Spatial Framework should require this to be built into planning considerations, with greater strength than existing and emerging powers. HM Government’s ambitions for growth must be balanced with a strict consideration for environmental impact and quality. Ground-breaking work recently undertaken by the Environmental Change Institute at the University of Oxfordshire has provided us with evidence-based pathways to reach net zero,<sup>2</sup> and we would encourage HM Government to similarly assess the pathways required across the Arc to reach shared carbon reduction targets.

Access to, along with, the means and ability to engage with green places, particularly natural green spaces and places, has been identified as being a key determinant of physical health and mental wellbeing. Lack of access to green and blue spaces has shown to have contributed to inequalities throughout the pandemic and continues to be so. The Arc spatial framework provides an opportunity to shape future communities and address these inequalities. In order to do so, green spaces, places and nature need to be designed and built into housing, living spaces and towns so that everyone has access; and this is facilitated and encouraged through projects that address barriers to access and connectivity. HM Government’s environmental ambition for the Arc speaks of doubling nature and if this nature is close, accessible and safe for communities, both the vision for nature and that for health and wellbeing can be achieved.

The Arc provides opportunity to demonstrate a green future, one where the crises of climate, biodiversity and health are addressed directly, and an integrated plan of action reaps multiple benefits. The spatial framework has the opportunity to design and deliver communities and economies that demonstrate the achievement of net

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<sup>2</sup> Environmental Change Institute. *Pathways to a Zero carbon Oxfordshire*, 2021. Available at: <https://www.eci.ox.ac.uk/publications/downloads/PazCo-final.pdf>

zero carbon through both new build and retrofit and can lead the way in thinking future economies at scale. All policies must provide sufficient protections for our environment, such as rapidly driving up building standards and creating low/zero carbon links between housing and employment. The Oxfordshire Plan 2050 will have a pivotal role in driving this policy agenda locally, and we would wish that the Spatial Framework does not seek to limit our ability to raise standards even higher.

### **3. The Economy**

In Oxfordshire, we aspire to continue to be a globally competitive economy which is sustainable, diverse, and inclusive, generating high quality, productive and knowledge-based employment for our communities. Our Local Industrial Strategy, produced in partnership with HM Government, sets high ambitions for our internationally significant local economy, and the same has been done across the Arc.

Our Local Industrial Strategy and Oxfordshire Investment Plan identifies innovation as the key driver for economic growth. Continued investment in our world class science and technology innovation infrastructure will be essential if we are to capitalise on our assets and strengths locally and across the Arc. This has been reinforced by HM Government's recently published Innovation Strategy which recognises the unique capability of the Oxfordshire economy to lead on the global stage and attract international investment into the UK and generate high quality jobs both in Oxfordshire and the Arc, as well as across the UK. Plans for the Spatial Framework must take account of how these assets and networks can be protected and supported to thrive on the international stage through targeted investment.

Despite the rapid economic growth cited in the consultation document, and the density of world leading assets which we can be proud of, Oxfordshire and the Arc is still home to substantial economic (and wider) inequalities that must be addressed head on. We must take our communities with us in this journey. The lack of affordable housing is of particular concern to our residents. We are establishing an Inclusive Economy Partnership to mobilise action to address this locally, and the Arc vision and Economic Strategy should suitably address how economic imbalances can be tackled through a holistic approach to spatial planning and place shaping.

We would encourage HM Government's Vision to seek improvements in educational attainment across the region, and to support the development of a skills system aligned to the needs of business and communities, helping to provide the conditions in which all people can benefit and thrive. We agree that we need to be more creative in how we make use of business and employment space, as demands and needs have changed through the pandemic.

### **4. Connectivity and Infrastructure**

In Oxfordshire, we want to transform movement and connectivity within the County and beyond. There needs to be greater digital connectivity and physical mobility in and between places in ways that enhance environmental, social, and economic wellbeing, with an emphasis on sustainable travel, including walking and cycling. We are pleased to see that these principles are broadly upheld through the Arc consultation document.

However, we hope for the necessary financial commitment for the remainder of the East West Rail route, together with its integration with the north-south routes that it crosses. As reflected in the Arc Economic Prospectus, the collective leadership of the area is clear that East West Rail should be electrified to meet our shared decarbonisation objectives as soon as possible.

As an area with higher than average emissions, we must push to decarbonise our transport network at pace and rapidly advance our ambitions for walking and cycling infrastructure. Our emerging Local Transport and Connectivity Plan and Infrastructure Strategy will provide ambitious detail on how we intend to prioritise healthy and environmentally conscious travel. The planning system has a critical role to play in allowing new communities to be designed in ways that encourage zero carbon travel, healthy and digitally connected living, and the Arc Vision should be bold to ensure that the Spatial Framework can tackle this.

## **5. Place-making**

The Oxfordshire Vision is very clear in its ambition to create healthy, resilient communities where people can live healthier, happier lives and enjoy better physical and mental health. However, the Arc Vision currently does not identify the importance of creating healthy communities which support health and wellbeing, and which seek to reduce the existing health inequalities present across the area. As recent resident feedback has indicated, it is very important that the Spatial Framework addresses health and wellbeing, in terms of how we plan, design, and connect our communities so that people can spend more of their life in good health. The experience of COVID-19 has emphasised how housing, access to green spaces, and the ability to connect with our community affect our public health and subsequent demand for health services. The pandemic has also exacerbated the deep health inequalities that persist across the region; these inequalities need to be addressed to ensure that all communities benefit and have a stake in the future of the region.

The Arc spatial framework is an opportunity to be more ambitious in its approach to place making, to embrace social as well as economic and environmental wellbeing to achieve a healthier, happier as well as greener future. For this reason we recommend that one of the key objectives for the Arc is that it should plan for growth in a way that creates healthier, happier, sustainable communities and that its Place Making theme should be renamed Healthy Place Making to reflect this.

We know from public consultations and stakeholder engagement that within Oxfordshire there is an appetite to see a different approach to place-shaping: one that is more ambitious, radical, innovative and creative, embracing social, economic and environmental wellbeing to achieve a happier, healthier, greener future. We have bold and dynamic economic ambitions brought to life in an investment plan<sup>3</sup>, and innovative work on inclusive growth has highlighted a need to actively recognise and address the inequalities of our success and ensure all communities have a stake in the future prosperity of Oxfordshire. The Arc consultation document briefly mentions the risk associated with increasing inequalities linked to growth, but we must be very clear that we aim to reduce existing inequalities, which are such a pervasive determinant to individual wellbeing.

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<sup>3</sup> Oxfordshire's Local Industrial Strategy Investment Plan, 2020

We want to have energy efficient, well-designed homes, sufficient in numbers, location, type, size, tenure and affordability to meet the needs of our growing economy, young people, residents and future generations. Affordability in particular remains a huge challenge to overcome, and this should be explicit in the Arc vision. We welcome the ambition for the Arc to be a world-leader in sustainable place-making and community living, but the area will need to benefit from bespoke support through the Arc collaboration to allow us to act in a world leading way. We believe in the particular importance of making sure the environment and sustainability is at the heart of new developments and retrofitting initiatives, enabling people to live healthy and connected lifestyles.

## **6. Delivering the Spatial Framework**

### **6a) Engaging Communities**

We welcome the commitment from HM Government to ensure the Spatial Framework is built on a vision shared with local communities. For Oxfordshire, our Strategic Vision provides the best reflection of what we want to achieve locally, and we would strongly encourage HM Government to take account of that. Whilst we note the intent to engage key institutions in future rounds of engagement and consultation, there must also be well publicised opportunities for members of the public to have their say, sufficient in number to represent the diversity of communities across the Arc. The engagement strategy should provide a forward view of opportunities to input into the process, and the “engagement roadmap” should be updated to be more specific about key dates in the process. We know that most residents across the Arc do not know about HM Government’s plans for the Arc, and that needs to change. We will continue to play our role through the Future Oxfordshire Partnership and the Arc Leaders Group to keep communities informed of the work taking place at an Arc level.

Through our own vision making process, we have actively targeted groups that are traditionally underrepresented in public consultations, such as younger people. We would like to see multiple forms of engagement taking place, across digital and physical platforms (subject to Covid-19 restrictions), to engage a wide range of people and places in the process. We would welcome the opportunity to support HM Government in connecting them to local groups.

### **6b) Data, Evidence and Digital Tools**

Local communities will expect the Spatial Framework, as with any spatial planning, to be robustly and transparently evidence based. Public access and confidence in this regard will be key to success. It is likely that evidence gathered across the Arc (environmental, economy, social etc) will illustrate the substantially different and distinctive nature of individual communities and places. Whilst we recognise the broad strengths and challenges for the Arc as a whole, the data needs to reflect the uniqueness of each of our communities. Extrapolating data across such a large area might risk producing sweeping conclusions about the area, informing subsequent policy directions, without respecting the distinctive and bespoke needs of individual areas. Accordingly, we would welcome engagement from HM Government to share data between organisations to ensure we can provide the most up to date local insights and evidence.

## **6c) Monitoring and Delivering the Spatial Framework**

The section entitled “*our approach to delivery and funding*” is devoid of any reference to collaboration and engagement with local authorities, which we would expect to have a key role in prioritising local infrastructure schemes and investments. Our Infrastructure Strategy and Local industrial Strategy Investment Plan are excellent sources of information which articulate local priorities and unfunded schemes that could benefit from investment. We note the potential to establish an Arc Growth Body (which could be better named) and we would welcome further clarity on how this would operate, and which organisations and individuals would be involved. Any delivery mechanism such as this would need to be accountable back to residents through a clear operating structure.

Monitoring and evaluation of the Spatial Framework will need to be innovative and holistic in its approach. Housing numbers and economic outputs will not tell us whether we are delivering on the environmental and wellbeing commitments within the Arc Vision. Indeed, progress in one area often has the potential to create adverse inequalities elsewhere, and this will need to be carefully considered. Delivery must be monitored with respect to improving environmental quality, reducing inequalities and the health and happiness of our communities. Housing and infrastructure schemes must be assessed for their quality and environmental impacts. For example, we must recognise the wider environmental and health benefits of cycle and walking infrastructure, and not just assess their value in simple economic terms, as recommended by the Committee on Climate Change. Any methodologies used to assess delivery must put the environment and people’s wellbeing at the heart of considerations, as we are doing through our Infrastructure Strategy refresh.

## **7. Sustainability Appraisal**

The Sustainability Appraisal Scoping Report emphasises that, without significant mitigations and planning, there is the potential for the Spatial Framework and associated ambitions to have a negative impact on the environment. Habitat loss, climate change, pollution, and increased flooding are all areas of serious concern, as is the unsustainable trajectory of local housing markets, which remain wholly unaffordable for many residents.

Notwithstanding the substantial adverse human and environmental impacts of flooding, the National Audit Office recently highlighted that maintenance and repair costs of flood defences could increase by between 20% and 70% a year up to 2050, as a direct result of climate change. Therefore, we would strongly encourage HM Government to establish a long-term resource and budget arrangement to support local councils in effectively planning for and maintaining local flood defences. We welcome the commitment to integrate the sustainability appraisal process into the planning process, but urge HM Government to heed the warnings expressed that “*without mitigation, all of these risks can significantly affect the health and wellbeing of the population, biodiversity and the natural environment, and the economy.*”

In closing, we would reiterate that many of our Partnership’s members will be writing separately in their own capacity and nothing within this submission will over-ride those comments.