



## CREATING THE VISION FOR THE OXFORD-CAMBRIDGE ARC SPATIAL FRAMEWORK

Response from Buckinghamshire Environment Action Group  
October 2021

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### ABOUT BEAG

Buckinghamshire Environment Action Group was founded in 2018 as Buckinghamshire Expressway Action Group to monitor proposals for a motorway across the county. Despite pronouncements by Highways England last spring, we were not convinced that the Expressway would not reappear at some stage as a supposed solution to the issue of east-west connectivity. We have therefore re-branded and expanded our committee. We have over 1,300 twitter followers, and growing, and the support of the North Bucks Parishes Planning Consortium. We are part of the umbrella group STARC (Stop The Arc Group), and our founder has a seat on the strategy committee of the Community Planning Alliance.

### INTRODUCTION

BEAG shares the concerns of our Unitary Authority, Buckinghamshire Council, regarding the legitimacy of this consultation, in particular their statement, ***“It is absolutely essential that the public consultation is accurate and reflects the generally accepted legal principles that consultees have sufficient information in order to respond sensibly.”***

BEAG evidences below how this consultation falls well short of the mark.

### A DIGITAL STRAITJACKET LOST IN TRANSLATION

While responding to the digital consultation in a personal capacity, the following unsatisfactory issues were discovered that meant an inability to communicate complete and accurate views. ***Assuming others were similarly flummoxed, then the consultation exercise is a shambles:***

- The questions posed insist on narrow, quantitative box-ticking where qualitative responses would be more meaningful.
- The 500-character limit for additional responses is woefully insufficient.
- Respondents are forced to tick a box for every question when they would rather not tick any box, including “neutral” but prefer to compose a qualitative response that better reflects and explains their views.
- There are too many subjective, complex terms that mean different things to different people, e.g. “sustainability”, so we cannot be sure if everyone, including DLUHC, mean the same thing.
- Partially completed forms were wiped clean despite being saved and browsers kept open. How many respondents found the same thing and didn’t start again, thus depriving the consultation of pertinent opinions?

***BEAG is therefore not completing the digital questionnaire but is identifying problems with the Arc, and the consultation process, and answering the questions that should have been asked in an holistic manner.***

### RELIANCE ON DIGITAL COMMUNICATIONS IS DISCRIMINATORY

Because of the prioritisation of digital communications, many stakeholders with limited digital access or capabilities are ***being denied an equal opportunity*** to learn about and respond to the consultation. This includes those in internet dark spots, on restricted incomes, with special needs, and some elderly.

Most of the marketing and communications during the consultation appears to be on social media, exacerbating the above issue. DLUHC’s preference for social media and its messaging is targeted at those more likely to share its views.



***The results of this consultation, as manipulated by DLUHC, will therefore not be a true reflection of views in the five counties.***

#### **THE VISION HAS ALREADY BEEN CREATED BEHIND OUR BACKS**

We were told, by DLUHC's Head of the Spatial Framework, Adele Maher, during the "Creating a vision for the OxCam Arc Consultation Stakeholder Workshops", that the vision – of a new Silicon Valley across five counties, requiring significant new development and necessary infrastructure as dictated by Government and corporate investors – has already been decided by Government. It has also been made clear that alternative scenarios, such as the status quo, or prioritising agriculture and the environment, are not allowed. If this is the case, then ***the claim that this consultation is about 'creating a vision' is a falsehood.***

If a 'decision' has been made, stakeholders have not been told whether 1) it is legally binding, thus constraining responses, or 2) open to reconsideration that would have allowed us to express a wider choice of views. In other words, ***stakeholders are either unsure how best to respond or are responding under a false premise.***

#### **LOCAL DEMOCRACY NOT TOP-DOWN DICTATS**

We share the concerns of Buckinghamshire Council and others that development plans are being imposed from above without local democratic scrutiny and accountability. Claims made by DLUHC's Adele Maher again, that it would be possible for Local Development Plans to override the Arc strategy, do not ring true and ***might have persuaded some stakeholders to respond differently to the consultation, thus invalidating the results.***

#### **THE GOALPOSTS HAVE MOVED AND SO SHOULD THE ARC**

The concept and vision for the Arc was determined some years ago, the East-West rail link being a key part – plans to reopen the line weren't conceived in a vacuum! ***Since then, we have had Brexit, Covid, the levelling-up agenda, net-zero commitments, recognition of a biodiversity crisis, and recognition that top-down economics don't work.***

Further "The UK Innovation Corridor" appears to be an ambitious yet more focused, manageable, democratic, less environmentally destructive vision that balances new development with urban redevelopment. By comparison, ***the Arc is an undemocratic, speculative, free-for-all that lacks up-to-date supporting evidence.***

We cannot see that the supposed benefits (local to national) of the Arc 'Silicon Valley' concept have ever been assessed against any alternatives, such as targeted investment (as discussed in the next paragraph), The UK Innovation Corridor or comparable investment in a 'northern power house' for example. ***This is a fundamental failure in strategic planning to the point of recklessness and negligence.***

#### **INVEST IN EXISTING COMMUNITIES WITHOUT GAMBLING ON UTOPIAS**

While the comprehensive wish lists for new developments are enticing (bike lanes, better public transport, more affordable homes, etc.) these are things established communities in the five counties have needed for a long time. ***The economic and quality-of-life impacts, that such necessary improvements would have on existing communities throughout the five counties, should be assessed without delay. This would put into perspective any additional marginal improvements for these communities the Arc might or might not bring. The necessity of the project could then re-evaluated in a proper light.***

### **INVEST IN THE 'LEFT BEHINDS', NOT IN THE 'WINNERS TAKING ALL'**

The consultation documents admit that “The Arc has been one of England's fastest-growing economic areas over the last 20 years”. In other words, our five counties are already thriving, and will continue to do so without the Arc concept, compared to other areas of the country.

To invest so heavily here will only exacerbate the regional economic divides. Trickle-down economics do not work. ***Direct investment in the north, midlands and coastal communities etc. is what is needed, not over-heating the south and east when the main beneficiaries will be developers, land-owners and foreign investors, e.g. Huawei.***

### **WE NEED MORE LOCALLY PRODUCED FOOD, NOT LESS**

According to the consultation documents, “Agriculture ... plays a dominant role in the land use across the Arc with around 54% of land being classed as cultivated / disturbed land and 20% classed as improved grassland.” Despite this, ***not one question in the consultation referred to agriculture.***

This omission is even more egregious when one considers the huge swathes of farmland that would be lost 1) for the Arc to be developed, and 2) to accommodate sufficient (but doomed-to-fail) ‘Biodiversity Net Gain’ projects. Local food security would be compromised and food-miles vastly increase, further compromising the sustainability of the project.

### **BIODIVERSITY NET GAIN DOES NOT WORK**

BEAG is unaware of any implementation of BNG (successful or otherwise) in a way being proposed for the Arc. The precautionary principle therefore demands scepticism, especially given the scale of the project.

A peer-reviewed academic paper evaluated recent developments undertaken in six English local authorities that are implementing mandatory no-net-loss (NNL) or BNG requirements in advance of the national adoption of mandatory BNG:

<https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820>

The researchers analysed the aggregate habitat changes proposed in a sample associated with a 34% reduction in the area of non-urban habitats, generally compensated by commitments to deliver smaller areas of higher quality habitat. They found that **these gains fall within a governance gap whereby they risk being unenforceable**. The paper also notes that this is a challenge that is shared with other net-outcome policies implemented internationally, further evidenced by <https://conbio.onlinelibrary.wiley.com/doi/pdfdirect/10.1111/conl.12664> where large gaps between the global implementation of offsets and the evidence for their effectiveness were identified and “we must urgently improve the evidence-base around efforts to mitigate development impacts on biodiversity.”

**In both these papers, the projects were not on the scale proposed for the Arc and should have been theoretically easier to plan and control.**

To conclude, the history of mitigation for development in this country doesn't bode well for a future where net gain is the overriding principle. The main issues being: 1) that the evidence base for mitigation measures isn't very good, and 2) monitoring and enforcement is weak to non-existent.

We don't see anything in the new approaches that really address these issues. See also <https://link.springer.com/article/10.1007/s13280-020-01337-5>

## INADEQUATE SUSTAINABILITY APPRAISAL SCOPING REPORT

We have identified the following concerns from Table 5.1:

- **Land use and Landscape**

The apparent focus on only landscapes that are officially designated is concerning. Many other landscapes with no designation are important and valued for various reasons and should not be automatically excluded from the possibility of protection or enhancement.

Protecting only “the highest quality agricultural land from disturbance and loss” is a travesty. It ignores the feasibility of improving land quality through environmentally friendly methods such as mixed cropping. In any event “lower quality” agricultural land is valuable as livestock pasture, carbon sinks, and as potential biodiversity havens. ***Including food security as a strategic issue would ensure the true and potential value of all agricultural land was recognised.***

***Not all natural environments are tolerant of being accessed by humans.*** The impact of accessibility should therefore be carefully assessed on a case-by-case basis

- **Historic Environment**

By looking to assess only heritage assets of “international renown”, the majority of assets will be ignored. The submission by Buckinghamshire Council details ***the best practise (page 98) that should be adopted in order to capture all assets of deserved value.***

- **Communities**

***Light and noise pollution should be included in the Spatial Framework Issues under this heading as these can negatively impact a sense of place and induce health issues.***

- **Biodiversity**

Ruling at this early stage that only ecological sites officially designated in some way are worthy of possible protection is dangerous. We draw your attention to the explanation by Buckinghamshire Council that ***designated sites are only part of wider habitat networks and they cannot function in isolation (page 96).***

***Biodiversity Net Gain is not a tried-and-true approach to improving the environment.*** See our explanation earlier in this submission.

***Light and noise pollution should be included in the Spatial Framework Issues under this heading as these can disturb wildlife and interfere with the delicate balance of nature.***

- **Climate Change**

***Greenhouse gases emitted abroad, and all transport emissions during import and delivery of materials, should be included in calculations to better reflect progress or otherwise towards net zero.***

- **Economy**

One of the identified issues is “Demand for labour exceeds supply” yet the supposed opportunity is to “Increase the Arc’s economic output ... and generate new jobs”, which will increase the demand for labour!



Specifically regarding Question 4 of the SA (Are you aware of any additional plans or programmes you think will be important to consider within the SA?):

***We draw your attention to the Buckinghamshire Growth Board's emerging strategic vision and initial recovery and growth proposition, Buckinghamshire's Local Nature Recovery Strategy, and The UK Innovation Corridor.***

**CONCLUSION**

***We urge DLUHC to reassess the Arc's rationale, viability, governance and potential impacts in the light of our comments and those of others, such as Buckinghamshire Council. The department should then return to the public with more democratic, informed and realistic proposals and a more inclusive, honest, balanced and meaningful consultation.***

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on behalf of BEAG (Acting Chairman Roger M Carey)

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