Oxford-Cambridge Arc Spatial Framework, Sustainability Appraisal and Shared regional principles

To:	Environment and Green Investment Committee
Meeting Date:	16 September 2021
From:	Steve Cox, Executive Director, Place & Economy
Electoral division(s):	All
Key decision:	No
Forward Plan ref:	N/A
Outcome:	To allow a response to be submitted by Cambridgeshire County Council ahead of the consultation deadline of Tuesday 12 October.
Recommendation:	It is recommended that Committee endorses the proposed response set out in Appendix A, subject to any changes delegated to the Executive Director: Place and Economy, in consultation with the Chair and Vice Chair of the Environment and Green Investment Committee, to allow a response to be submitted before the consultation deadline of Tuesday 12 October.

Officer contact:
Name: Emma Fitch
Post: Assistant Director, Planning, Growth & Environment
Email: emma.fitch@cambridgeshire.gov.uk
Tel: 01223 715531

Member contacts:
Names: Councillors Lorna Dupre and Nick Gay
Post: Chair/Vice-Chair
Email: Lorna.Dupre@cambridgeshire.gov.uk / Nick.Gay@cambridgeshire.gov.uk
Tel: 01223 706398

1.   Background

1.1   The Oxford-Cambridge (OxCam) Arc is the name given to the area identified by government as a key economic priority with the potential to be one of the most prosperous, innovative and sustainable economic areas in the world. It is made up of the five ceremonial counties of Oxfordshire, Bedfordshire, Buckinghamshire, Cambridgeshire, and Northamptonshire. It includes:

- 2 County Councils: Oxfordshire and Cambridgeshire.
- 8 Unitary Authorities: Bedford, Buckinghamshire, Central Bedfordshire, City of Peterborough, Luton, Milton Keynes, North Northamptonshire and West Northamptonshire.
- 10 district councils: Cambridge, Cherwell, East Cambridgeshire, Fenland, Huntingdonshire, Oxford, South Cambridgeshire, South Oxfordshire, Vale of White Horse and West Oxfordshire.
- 1 Combined Authority: Cambridgeshire and Peterborough.

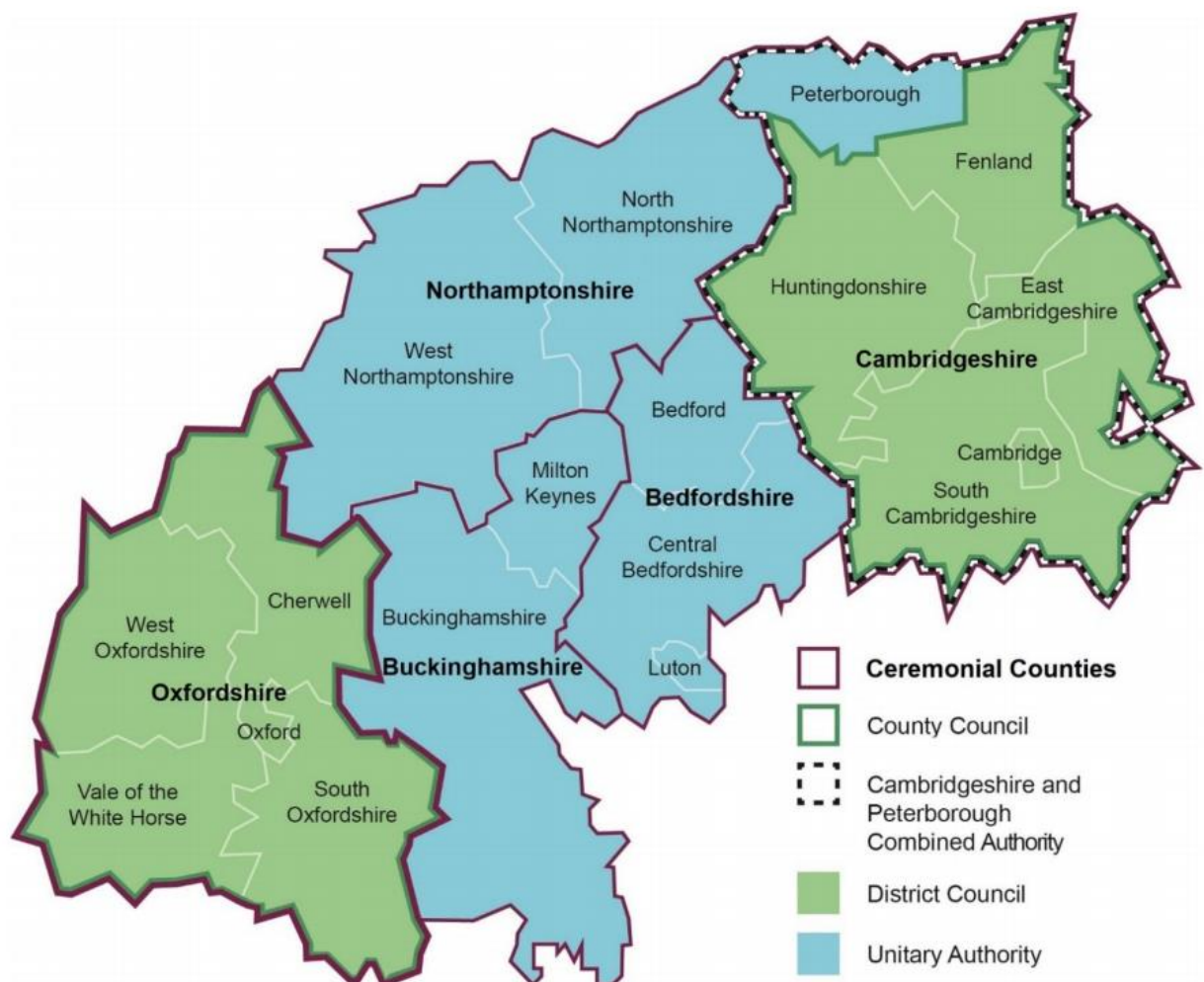1.2   The geographical scope of the OxCam Arc is shown in Figure 1.1 below:

Figure 1.1 – The Oxford-Cambridge Arc

1.3   The consultation document published by the Ministry of Housing, Communities and Local Government (MHCLG) on Tuesday 20 July, 'Creating a vision for the Oxford-Cambridge Arc' is the first of 3 planned public consultations on the Spatial Framework. The spatial framework will form part of National Planning Policy (explained further in section 4 of this report) and is intended to guide the future growth of the area until 2050. Although the scope of the consultation is wide ranging, the questions are clearly geared towards members of the public rather than public sector organisations; albeit the consultation is clearly open to public sector organisations to respond. Furthermore, the online electronic submission method used by MHCLG limits the opportunity to provide comments of any substance as responses are restricted to 500 characters (including spaces) per topic area, which is why officers are proposing to send the fuller response set out in Appendix A by e-mail to avoid missing the opportunity to provide the Council's full views on this consultation. Whilst this is only the first of three consultation phases, where we would expect to have further opportunity to provide more detailed commentary and evidence to help guide the development of the OxCam Arc spatial framework in Spring and Autumn 2022, it is still essential to set out our views at a county level at an early stage. We are therefore focussing the responses for this first round of consultation on the key themes and our proposed county wide high level principles which emphasise the Council's priorities taken from the joint administration agreement, officer comments, corporate plans, strategies and planning policies. This will provide a 'hook' for future consultations and discussions at a later date, whilst demonstrating that key concerns and priorities have been raised early on in the consultation process for the whole County and not just for those settlements within the OxCam Arc area.

1.4   Alongside the above Spatial Framework, the government has published the Sustainability Appraisal Scoping Report for consultation, with its related Annex document. The Sustainability Appraisal (SA) is designed to inform the development of the Spatial Framework and ensure that sustainability is at its heart. The consultation is supported by a new and innovative digital engagement platform designed to give a voice to the wider community, as well as traditional engagement methods such as workshops. However, as emphasised in paragraph 1.3 above, the digital platform and electronic submission for the consultation appear to have been designed for the benefit of local residents rather than public organisations and therefore comes with its own limitations that makes it difficult for the Council to put across the breadth of challenges such a vision would have at a County level through that format.

1.5   Feedback from this consultation will help, it is stated, to shape the vision for the Spatial Framework and ensure that it is built on the priorities and aspirations of the communities it will serve, thus creating the Spatial Framework's vision for the Arc to 2050. Using the vision as a foundation, the next document proposed by MHCLG 'Towards a Spatial Framework' is planned to be published for consultation in Spring 2022, focussing on options for delivering the Spatial Framework's objectives based on feedback from engagement, initial evidence gathering and analysis.

1.6   The government then hope to publish a draft Spatial Framework for consultation in Autumn 2022, with implementation of the final framework shortly after. The public will be consulted with at each of these stages and government will continue to work closely with local stakeholders throughout. The consultation is open to all members of the public.

1.7   With the right interventions and investment, the Government's local economic forecasts suggest that by 2050 we would see economic output in the Arc doubling to over £200bn. The Arc's success is key to the UK's national prosperity, international competitiveness, and ability to meet the challenges and opportunities we will face as a country over the next century, including climate change and supporting nature recovery, technological change, fighting COVID-19 and preventing future pandemics. The OxCam Arc offers a significant opportunity for the government and partners to work together to support the harmonious delivery of improved connectivity, productivity and place-making, whilst ensuring pioneering environmental standards and enhancements are delivered and the Government's 25 Year Environment Plan is put into action. The '[Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc](#)' will also be key to the development and founding principles for the OxCam Arc, which is why officers have also recommended the endorsement of these published principles, whilst also building upon them in line with comments made on the Spatial Framework and SA.

1.8   If Committee endorses the proposed response in Appendix A, subject to any changes delegated to the Executive Director: Place and Economy, in consultation with the Chair or Vice Chair of the Environment and Green Investment Committee, the outcome will be that officers will be able to submit a consultation response to MHCLG on behalf of Cambridgeshire County Council ahead of the deadline of Tuesday 12 October.

2.   OxCam Arc Spatial Framework, Sustainability Appraisal and Shared regional principles

2.1   The proposed officer response set out in Appendix A covers the OxCam Arc Spatial Framework document; and the Sustainability Appraisal (SA) Scoping Report (and related Annex); which endorse and where appropriate build upon the published 'Shared regional principles for protecting, restoring and enhancing the environment', from a Cambridgeshire County Council perspective. The following paragraphs provide a summary of the OxCam Arc Spatial Framework and SA discussed in Appendix A, alongside the published regional environmental principles, to set out their content and the main areas of comment being proposed.

2.2   The OxCam Arc Spatial Framework is split into eight chapters providing an introduction to creating a vision for the OxCam Arc; The Environment; The Economy; Connectivity and Infrastructure; Place-making; Commitment to engaging communities; Commitment to date, evidence and digital tools; and how to Monitor and deliver the Framework. Given that the Spatial Framework proposed will set national planning policy and national transport policy for the whole OxCam Arc area set out in Figure 1.1 above on a strategic scale to shape future local planning decisions on how land is used; how the environment is protected and enhanced; where and what type of new development happens; and what infrastructure is provided; comments have been provided by officers to help inform and shape the planning for the growth proposed in a sustainable and strategic way that ensures that the principles proposed are met. It takes account of the sustainability principles at its core to guide planning decisions and investment under four policy 'pillars' for the environment; the economy; connectivity and infrastructure; and place-making. The challenges and competing demands in achieving these aspirations, not least based on the different tiers of decision making that exist across the Arc are drawn out in the proposed response. As part of the consultation the Government is seeking to identify potential delivery mechanisms for the

investment priorities within the Spatial Framework, which includes the potential to set up a new Arc Growth Body, discussed further in paragraph 4.5 below.

2.3   The OxCam Arc Spatial Framework SA is also split into eight chapters providing an introduction to sustainability appraisal; The OxCam Arc area; Why doing a SA; the Strategic Context; Scoping of Key Effects; How carrying out the assessment; How to communicate the results; and Your Views. The SA will address environmental, social and economic factors to ensure that the wider impacts of policies as they are developed within the Spatial Framework are taken into account and will follow the legislative requirements for this process. The proposed approach is seeking not only to assess the impacts of draft policies but to embed sustainability into the development of policies and the creation of the Spatial Framework. Views have focused on the key issues and opportunities that should be the focus of the appraisal based on the questions set in Chapter 8 of the document. The document acknowledges that infrastructure underpins economic growth, and across the Arc inadequate infrastructure in housing, transport, utilities and digital platforms is a key constraint for the area that needs to be considered on a strategic scale to address inadequacies and deliver new well-planned infrastructure which integrates natural capital, whilst supporting economic and population growth.

2.4   The published 'Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc' produced by the OxCam Arc Environment Working Group, with input from a range of organisations such as local nature partnerships, Natural England, the Environment Agency and Anglian Water, have been set to effectively create a 'Green Arc' as an internationally significant exemplar for the very best in sustainable living and working, for practical ways to doubling nature, and innovative solutions to energy and water shortages as well as stimulating a green economy. The 5 principles are made up of working towards a target of net zero carbon at an Arc level by 2040; to protect, restore, enhance and create new nature areas and natural capital assets; to be an exemplar for environmentally sustainable development in line with the ambitions set out in the Government's 25 year plan; ensure that existing and new communities see real benefits from living in the arc; and using natural resources wisely. These principles have been created to form the basis for the creation of an OxCam-wide Environmental Strategy that will embrace everything from green spaces, to housing standards, to sustainable transport, energy generation and transmission and water management and conservation. The foreword written by Councillor Bridget Smith as the Leader of South Cambridgeshire District Council and the Chair of the Arc Environment Working Group acknowledges that if "*we are to double economic growth along the OxCam Arc then as a minimum we must be doubling nature and ensuring that the Arc leads the way in the zero carbon living and working of the future*". The regional principles are a statement of regional intent that includes the protection, restoration and enhancement of the environment (air, water, land, soil, biodiversity), net biodiversity and net environmental gain, net zero carbon, the sustainable use of resources. The principles align with the government's 25 year Environment Plan and the commitment in the joint declaration to embody the 25 year plans goals and ambitions. The regional principles were shared and agreed with the previous leader of the Council, which is why officers are seeking to endorse these, and where necessary build upon them in our high level County Council principles set out in section 3 below as part of our response in Appendix A.

3. High level principles

3.1 The following high level principles have been identified by officers in relation to the Spatial Framework consultation document, to help clarify the expectations of the Council and align with feedback already provided by the Highways and Transport Committee on 22 June 2021 in relation to the East / West Rail proposals:

General principles
- This is a Government initiative, and not an initiative that has been created or is being led by Cambridgeshire County Council.
- The amount and detail of information within the consultation is not sufficient or adequate in order to respond with any detail or certainty.
- The Council's engagement in the process should not in any way be construed as endorsement of what is being put forward.

Growth
- Any growth from the Arc must be led through the Local Plan process and be fully justified on need in terms of housing numbers etc., which must come forward with benefits for existing communities as a priority – particularly for those communities in Cambridgeshire that are close to the border with Bedfordshire for example, that may experience wider implications outside of Cambridgeshire itself.
- The locations for future growth (including those close to borders with other Councils) should primarily be chosen based on opportunities to enhance and complement existing communities supported by the local plan process rather than being informed by transport routes such as East / West Rail. This is because the right locations for growth should come first, to then allow the alignment of the transport routes and solutions to be informed, which can then avoid any unnecessary segregation of existing and new communities leading to unsustainable development. Any transport infrastructure, including any final route for East / West Rail and related stations should therefore be based on the appropriate locations for growth in the Ox-Cam Arc and the appropriate scale of that growth, where it is clear if this is in addition to locally planned growth or instead of, which must align with national guidance on justifying additional housing numbers.
- The necessary infrastructure to support such growth, including the final route for East / West Rail, should be informed by the consideration of existing settlements and how new proposals will complement or enhance existing areas. This will need to take account of health, education and social infrastructure, including connectivity via public rights of way (PROW) and non-motorised user (NMU) routes, as well as access to green open spaces, and not be based simply on transport and economic requirements.
- An understanding of total waste arisings and mineral requirements (including the use of railheads where mineral does not geologically exist within the OxCam Arc area) will need to be understood and planned for in advance, which include opportunities for a reduction in waste and better use of resources in line with the circular economy, sustainable use of mineral resources close to the source of need, water storage, biodiversity benefits and access to open spaces for new communities, all of which need to be planned in at the very early stages of conception rather than being left to the end of such projects.

Carbon and Climate Change
- Any new growth requirements should demonstrate how they will help achieve the County's aspirations for Net Zero – which should look at this holistically starting with the location and

the type of housing and infrastructure proposed, so that any growth can contribute to the decarbonisation agenda from day one.
- The growth proposed should show how it complements existing communities and shows economies of scales that will allow a mixed use development that provides job opportunities and a reduction in travel and access to services to then inform things like the East / West Rail route.

Environmental / Social impacts
- Endorsement of the shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc, produced by the OxCam Arc Environment Working Group set out in paragraph 2.4; whilst building on these to ensure that net zero is brought forward and wherever possible in line with the Council's aspirations for a target of 2030, and to ensure that the historic environment is built into the shared regional principles.
- Any new growth development sites should contribute to doubling nature to offset adverse construction impacts and give new communities access to open green spaces that will assist with health and well-being benefits for both the existing and new communities.
- Any new growth development sites should contribute to maximising positive health and wellbeing outcomes for all, and where possible should narrow the gap in health inequalities.
- The natural and historic environment should be used to inform and develop the growth area, rather than come along at the end of the process. This should demonstrate access to such areas for communities and for the protection of our heritage, whilst recognising local unique identities and creating a sense of place.
- Management of water storage and use, including flood mitigation measures, should be considered at an early stage to inform the locations of growth and any impacts on existing communities.

Integration and connectivity
- The new growth areas should be designed to complement and enhance existing communities to facilitate wider opportunities for local public transport services and connection to projects such as East / West Rail or new non-motorised user routes, including PROW, rather than be based on the alignment of such routes without looking at how it will sit alongside existing settlements.
- A strategic railway scheme design and service specification to support this growth should be based on the best place for sustainable growth which allows for a flexible mix of fast inter-regional and local stopping passenger services, and for freight services.
- High quality pedestrian and cycle links designed on the standards set out in LTN 1/20 should be provided between existing settlements and new communities, which then link to new transport proposals and interchanges such as East / West Rail.
- The design and delivery of active travel measures, such as walking and cycling facilities, and measures that support and enhance the health and well-being of existing residents must be prioritised and demonstrated in any future designs or proposals for the vision brought forward.
- NMU routes should be inclusive of all NMUs including equestrians in accordance with paragraph 98 of the National Planning Policy Framework (NPPF) July 2021 and the Cambridgeshire Rights of Way Improvement Plan, wherever possible. This also applies to roadside NMU routes.

Economic Development and 'Levelling Up'

- The spatial vision should maximise the benefits from the proposed local economic forecasts from this key economic priority to ensure that the whole Arc area benefits from the prosperity, competitiveness and economic recovery from COVID-19 discussed in the high level principles set out in the consultation documentation, which includes levelling up across the whole Arc area, and in the case of Cambridgeshire reaching out to benefit Fenland.

3.2 Subject to approval by this Committee, the above high level principles, which endorse and where necessary build on the published regional environment principles discussed in section 2 above, will be finalised using delegated powers and included in the Council's formal response to 'Creating a vision' question 2 (set out in draft in Appendix A to match the above text).

4. Resource and Decision-Making Implications

4.1 Council officers are already engaged in conversations with MHCLG and Homes England on key topics and through working groups on Design and Placemaking; Engagement; Routes to Delivery; and the Emerging Technical Evidence Base, to ensure that we are able to help shape and influence proposals in the OxCam Arc, that address our aspirations, whilst also being mindful of some of the concerns that will be held by local communities and our residents within Cambridgeshire. It also allows officers to ensure that there is consistency of information, particularly around related projects such as the East / West Rail.

4.2 Discussions around opportunities such as biodiversity net gain and water storage through the forward planning of mineral borrow pits for example, for landscape scale restoration that have been promoted by the Royal Society for the Protection of Birds (RSPB), have also been acknowledged and discussed in wider regional meetings to engage with the mineral and waste industry for example, rather than limiting the proposals to just local businesses and housebuilders.

4.3 The ambitious MHCLG timescales for consultation and policy development set out in paragraphs 1.3 to 1.5 mean that a challenging timescale of meetings for officers is currently being undertaken, alongside wider Nationally Significant Infrastructure Projects (NSIPs). This resource pressure is being felt by all tiers of the decision making process, so lead officers are trying to avoid duplication of officers where possible and to create a co-ordinated approach with both the Combined Authority; and our City / District Council colleagues. This brings into question who is best placed to lead this work and where the relevant duties fall to ensure that all relevant matters are picked up. Given the scale of the OxCam Arc shown in Figure 1.1 and the number of decision making bodies with different duties identified in paragraph 1.1 this interaction and proposed delivery mechanism will be essential for local input and understanding.

4.4 The proposed status of the OxCam Arc Spatial Framework within the planning system is shown in Figure 1.2 below; but effectively as it would form part of the national planning and transport policy that informs local Development Plans including Local Plans and Neighbourhood Plans (which includes the Council's recently adopted minerals and waste local plan), Local Transport Plans, and Local Industrial Strategies within the area and local decision making, where decisions on planning applications would need to take spatial framework into account as a material planning consideration; it is of crucial importance that

the final document contains policies and proposals that support and align with our Council priorities and ambitions:

Figure 1.2 – Status of the OxCam Arc Spatial Framework within the planning system

4.5   As part of the consultation the Government is seeking to identify potential delivery mechanisms for the investment priorities within the Spatial Framework. For example, the government is considering setting up a new Arc Growth Body[1]. This provides an opportunity to also consider the role the body could potentially play in driving forward the Arc's investment priorities identified in the Spatial Framework to help unleash the area's potential as a global innovation powerhouse by promoting the Arc internationally. The intention is for the Government to work with local partners to ensure that the Growth Body is tailored to the region's unique opportunities.

5.   Alignment with corporate priorities

5.1   Communities at the heart of everything we do

The development of the OxCam Arc Spatial Framework has the potential to impact on existing and new communities within Cambridgeshire. The ability to shape and influence the vision for the area and align it with the Council's priorities will therefore be key.

5.2   A good quality of life for everyone

Ensuring that the focus on developing the Spatial Framework includes the natural and historic environment and the shared regional principles for protecting, restoring and enhancing the environment will ensure that a good quality of life for everyone in existing and new communities will be protected, which includes local issues such as flooding and water management.

---

[1] See press release from Ministry of Housing, Communities and Local Government on the intention to establish the Arc Growth Body, available at: https://www.gov.uk/government/news/government-plan-to-transform-oxford-cambridge-arc-into-uk-s-fastest-growing-economic-region

5.3 Helping our children learn, develop and live life to the full

Ensuring that we plan for the right infrastructure, at the right time and in the right location will be key to ensuring that we maintain our support in ensuring the children of Cambridgeshire learn, develop and live life to the full.

5.4 Cambridgeshire: a well-connected, safe, clean, green environment

Having an opportunity to shape and inform the Spatial Framework provides an opportunity to ensure that the vision and principles that form part of it, adequately take account of the Council's climate change agenda and aspirations to ensure that Cambridgeshire is a well-connected, safe, clean and greener environment.

5.5 Protecting and caring for those who need us

It will be essential for the Spatial Framework to take account of all members of the community, which needs to ensure that residents that need additional protection or care are adequately catered for. Providing new communities that are able to support, protect and care for the needs of residents will be essential, as has been evidenced in existing communities during the recent COVID-19 pandemic.

6. Significant Implications

6.1 Resource Implications

The report above sets out details of significant implications in paragraphs 4.1 to 4.3.

6.2 Procurement/Contractual/Council Contract Procedure Rules Implications

There are no significant implications within this category.

6.3 Statutory, Legal and Risk Implications

There are no significant implications within this category.

6.4 Equality and Diversity Implications

There are no significant implications within this category.

6.5 Engagement and Communications Implications

There are no significant implications within this category, particularly as assistance with the engagement and community strategy is being led by the Cambridgeshire and Peterborough Combined Authority, with input from our communications team.

6.6 Localism and Local Member Involvement

The consultation programme allows for all elected Members and communities to engage in the process, so there are no significant implications identified within this category.

6.7   Public Health Implications

The built Environment has significant implications on health both at an individual and population level, these impacts are outlined in the body of the report and in the appendix.

6.8   Environment and Climate Change Implications on Priority Areas:

6.8.1   Implication 1: Energy efficient, low carbon buildings.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.2   Implication 2: Low carbon transport.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.3   Implication 3: Green spaces, peatland, afforestation, habitats and land management.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.4   Implication 4: Waste Management and Tackling Plastic Pollution.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.5   Implication 5: Water use, availability and management:
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.6   Implication 6: Air Pollution.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

6.8.7   Implication 7: Resilience of our services and infrastructure, and supporting vulnerable people to cope with climate change.
Positive/neutral/negative Status: Neutral
Explanation: Whilst there is a good potential for the Spatial Framework to lead to a positive status the detail is not yet known so all implications have been set at neutral for the purpose of this report.

Have the resource implications been cleared by Finance?   Yes
Name of Financial Officer: Sarah Heywood

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement?   Yes
Name of Officer: Henry Swan

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law? Yes
Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact?
Yes
Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications?
Yes
Name of Officer: Sarah Silk

Have any localism and Local Member involvement issues been cleared by your Service Contact?   Yes
Name of Officer: Emma Fitch

Have any Public Health implications been cleared by Public Health?
Yes
Name of Officer: Iain Green

If a Key decision, have any Environment and Climate Change implications been cleared by the Climate Change Officer?
N/A

7.   Source documents guidance

7.1   Source documents

1. Creating a vision for the Oxford-Cambridge Arc Consultation
2. Oxford-Cambridge Arc Spatial Framework Sustainability Appraisal Scoping Report
3. Annex to the Spatial Framework Sustainability Appraisal Scoping Report
4. Shared regional principles for protecting, restoring and enhancing the Oxford-Cambridge Arc

6.2   Location

1. Creating a vision for the Oxford-Cambridge Arc
2. Sustainability Appraisal Scoping Report
3. Sustainability Appraisal Scoping Report Annex
4. Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc

Appendix A – Proposed response:

<u>SPATIAL FRAMEWORK: Creating a vision for the Oxford-Cambridge Arc:</u>

<u>Creating a vision</u>

Q1: What place could it be? What words come to mind?

Supportive of all the words listed under Question 1. However, see the answer to Question 2 below, as the high level principles set out will depend on the outcomes and the answer to this question should not be seen as support by Cambridgeshire County Council in any way.

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

The following high level principles have been set on behalf of Cambridgeshire County Council for the vision for the Arc to 2050:

General principles
- This is a Government initiative, and not an initiative that has been created or is being led by Cambridgeshire County Council.
- The amount and detail of information within the consultation is not sufficient or adequate in order to respond with any detail or certainty.
- The Council's engagement in the process should not in any way be construed as endorsement of what is being put forward.

Growth
- Any growth from the Arc must be led through the Local Plan process and be fully justified on need in terms of housing numbers etc., which must come forward with benefits for existing communities as a priority – particularly for those communities in Cambridgeshire that are close to the border with Bedfordshire for example, that may experience wider implications outside of Cambridgeshire itself.
- The locations for future growth (including those close to borders with other Councils) should primarily be chosen based on opportunities to enhance and complement existing communities supported by the local plan process rather than being informed by transport routes such as East / West Rail. This is because the right locations for growth should come first, to then allow the alignment of the transport routes and solutions to be informed, which can then avoid any unnecessary segregation of existing and new communities leading to unsustainable development. Any transport infrastructure, including any final route for East / West Rail and related stations should therefore be based on the appropriate locations for growth in the Ox-Cam Arc and the appropriate scale of that growth, where it is clear if this is in addition to locally planned growth or instead of, which must align with national guidance on justifying additional housing numbers.
- The necessary infrastructure to support such growth, including the final route for East / West Rail, should be informed by the consideration of existing settlements and how new proposals will complement or enhance existing areas. This will need to take account of health, education and social infrastructure, including connectivity via public rights of way (PROW) and non-motorised user (NMU) routes, as well as access to green open spaces, and not be based simply on transport and economic requirements.

- An understanding of total waste arisings and mineral requirements will need to be understood and planned for in advance, which include opportunities for a reduction in waste and better use of resources in line with the circular economy, sustainable use of mineral resources close to the source of need, water storage, biodiversity benefits and access to open spaces for new communities, all of which need to be planned in at the very early stages of conception rather than being left to the end of such projects.

Carbon and Climate Change
- Any new growth requirements should demonstrate how they will help achieve the County's aspirations for Net Zero – which should look at this holistically starting with the location and the type of housing and infrastructure proposed, so that any growth can contribute to the decarbonisation agenda from day one.
- The growth proposed should show how it complements existing communities and shows economies of scales that will allow a mixed use development that provides job opportunities and a reduction in travel and access to services to then inform things like the East / West Rail route.

Environmental / Social impacts
- Endorsement of the shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc, produced by the OxCam Arc Environment Working Group set out in paragraph 2.4; whilst building on these to ensure that net zero is brought forward and wherever possible in line with the Council's aspirations for a target of 2030, and to ensure that the historic environment is built into the shared regional principles.
- Any new growth development sites should contribute to doubling nature to offset adverse construction impacts and give new communities access to open green spaces that will assist with health and well-being benefits for both the existing and new communities.
- Any new growth development sites should contribute to maximising positive health and wellbeing outcomes for all, and where possible should narrow the gap in health inequalities.
- The natural and historic environment should be used to inform and develop the growth area, rather than come along at the end of the process. This should demonstrate access to such areas for communities and for the protection of our heritage, whilst recognising local unique identities and creating a sense of place.
- Management of water storage and use, including flood mitigation measures, should be considered at an early stage to inform the locations of growth and any impacts on existing communities.

Integration and connectivity
- The new growth areas should be designed to complement and enhance existing communities to facilitate wider opportunities for local public transport services and connection to projects such as East / West Rail or new non-motorised user routes, including PROW, rather than be based on the alignment of such routes without looking at how it will sit alongside existing settlements.
- A strategic railway scheme design and service specification to support this growth should be based on the best place for sustainable growth which allows for a flexible mix of fast inter-regional and local stopping passenger services, and for freight services.
- High quality pedestrian and cycle links designed on the standards set out in LTN 1/20 should be provided between existing settlements and new communities, which then link to new transport proposals and interchanges such as East / West Rail.

- The design and delivery of active travel measures, such as walking and cycling facilities, and measures that support and enhance the health and well-being of existing residents must be prioritised and demonstrated in any future designs or proposals for the vision brought forward.
- NMU routes should be inclusive of all NMUs including equestrians in accordance with paragraph 98 of the National Planning Policy Framework (NPPF) July 2021 and the Cambridgeshire Rights of Way Improvement Plan, wherever possible. This also applies to roadside NMU routes.

Economic Development and 'Levelling Up'
- The spatial vision should maximise the benefits from the proposed local economic forecasts from this key economic priority to ensure that the whole Arc area benefits from the prosperity, competitiveness and economic recovery from COVID-19 discussed in the high level principles set out in the consultation documentation, which includes levelling up across the whole Arc area, and in the case of Cambridgeshire reaching out to benefit Fenland.

Q3: How do you feel overall about the future of the Arc? What are your hopes and fears?

By taking a cohesive and 'up-front' approach to environmental matters across the entire OxCam Arc, there is potential to deliver benefits for the natural and historic environment, including access to it and sustainable modes of transport to support it, to positively influence and be influenced by growth across the whole area and to ensure that development in one area does not adversely impact another. This would present an opportunity to deliver broader environmental benefits for current and new residents, provided it is managed, resourced and delivered appropriately and in line with the high level principles set out in our response to Q2 above. This approach also aligns with our climate change commitments as a Council.

The fear is that if the growth areas are not planned and informed through local knowledge and a sound evidence base, with both the location and quantum of growth understood at an early stage to help inform key transport options, mineral and waste requirements, infrastructure provision and timing, viability, impacts on the natural and historic environment, and relationships to existing communities to include implications for water management and flood risk etc. the vision will be informed and led instead by transport alignments that may well create segregation of communities rather than cohesion and ultimately unsustainable development where the opportunities for the natural and historic environment, including using mineral borrow pits close to the source of the need with beneficial aftercare and water storage opportunities, will be missed. Furthermore, without the ability to feed into growth areas close to the County borders, the holistic consideration across the wider Arc area won't be understood and could be to the detriment of existing communities and their residents, particularly in relation to flood mitigation and resilience.

Q4: What do you think are the most important things that it needs to do, as a strategic plan, to achieve this? Work at an Arc-wide level to tackle shared issues/ opportunities on the Environment; Economy; Connectivity and growth; Place-making; and Supporting monitoring and delivery?

As set out in our response to Q3 above, the Spatial Framework will need to be informed by early engagement and collaboration with key planning and environment stakeholders and local communities, a sound-evidence base (which includes consideration of mineral and waste arisings and the infrastructure required to support the growth), and a recognition of the cross-cutting contribution that some key elements, such as the historic environment, can play in the sustainability pillars, including the significant role they can make to the success of sustainable

economic growth in the Arc. In relation to the historic environment example broad guidance is available on the Historic England website at: https://historicengland.org.uk/research/heritage-counts/ including: Heritage and the Economy (2020); Heritage and the Environment (2020); Heritage and Society (2020). This would fit with the government thoughts that 'a joined-up, long-term approach to planning for growth is the best way to realise our ambitions for economy and sustainability in the Oxford-Cambridge Arc' (paragraph 1.5 of the Spatial Framework).

In line with our response to Q3 above, it will be essential that the evidence base genuinely informs the location and quantum of growth that can be clearly evidenced for the whole of the OxCam Arc (which allows any cross border issues to be understood and planned for), that then feeds into the wider mineral and waste requirements and the use of borrow pits that can assist with restoration and open space aspirations etc., before then considering the transport solutions and infrastructure required to support the growth; as with the East / West Rail and A428 proposals coming forward first there is a risk that everything is being planned in the wrong order that ultimately may lead to a lack of cohesion between existing and new communities and growth taking place in the wrong location at the wrong time.

Q5: If there is anything you would like to add, we would love you to tell us.

The Spatial Framework should demonstrate how the Council's high level principles set out in response to Q2 above have been taken into account when setting out the future vision for the OxCam Arc. It should also define the approach that will be taken to deliver the vision and its role in decision making and local plan preparation; whilst also being clear on the community and economic benefits to existing settlements, market towns and villages across the whole Arc area and out into the wider County and adjoining Unitary areas, and clearly set out the location and quantum of growth proposed that can be justified in the local plan process, which should aim to avoid speculative unsuitable development. In setting out the above it should define how the vision will be supported by infrastructure and access to green open spaces, and be designed to complement the climate change aspirations of all the Councils in the region. This will need to take account of development viability and the aspiration to develop mixed use settlements that cater for all age groups with the necessary educational and health care facilities and wider social infrastructure needs for new communities.

The Environment

Green spaces, nature and biodiversity

Q1: Making sure the natural environment is protected, restored and improved. For example, improving new and existing green spaces. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – Cambridgeshire has one of the lowest amounts of biodiversity sites and accessible green space in the country and the OxCam Arc Spatial Framework should take this opportunity to create more high quality natural habitats and improve existing habitats following the Lawton Review Principles of "bigger, better and more joined up". Cambridgeshire & Peterborough is also one of the Future Parks pilot projects which aims to understand how more high quality accessible greenspace can be provided at all levels from Local parks to Country Parks. We should be using the findings of this project to better inform greenspace provision, sustainable funding and management across the whole of the OxCam Arc area. Furthermore, it should also apply to the historic (manmade) environment but with the revised wording of 'protected, conserved and

enhanced where possible'. The historic and natural environment are closely interrelated and interwoven and this needs to be recognised as part of the work towards setting the direction of travel for the OxCam Arc. In seeking to achieve the above, the Spatial Framework would also be in line with the Council's climate change aspirations and the high level principles proposed for the OxCam Arc by Cambridgeshire County Council.

Q2: Making sure the most is made of the natural environment and that all people can have access to it. For example, making improvements to woodlands, wetland, green space and water and making sure people can visit them if they want to. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – As already highlighted in our response to Q1 above, it is essential that the OxCam Arc Spatial Framework protects and enhances, creates and delivers nature recovery networks and delivers on biodiversity net gain, in line with the Council's climate change aspirations. The Spatial Framework also needs to improve access to greenspace and the wider countryside through maintaining and enhancing all the public rights of way networks across the OxCam Arc area to encourage residents to become more active especially following the recent COVID-19 Pandemic and the increased use of local greenspaces and our public rights of way network. The vision also needs to plan in and provide more strategic green spaces where visitor centres can be used as gateways for attracting more people to use and understand the natural environment around them, which can also assist with the economic recovery. Furthermore, the COVID-19 lockdown has also recently highlighted the importance of the natural historic environment, in addition to the green spaces, in playing a vital role in our nation's mental health and wellbeing. The council is one of the current cohort in the 'Future Parks Accelerator' programme, supported by the National Lottery Heritage Fund, MHCLG and National Trust to explore new and innovative ways to manage, use and fund our open spaces whilst providing benefits for natural capital and biodiversity. We would hope that our learning can influence the wider OxCam Arc area.

Q3: Making sure new growth leaves the environment in a better state than before. For example, keeping land in its natural state, and making it more wild, where appropriate. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important - As previously mentioned, Cambridgeshire has one of the lowest amounts of biodiversity and accessible greenspace. This has led to some of our key biodiversity sites reaching their "carrying capacity" and are now suffering physical and ecological damage. This is one of the issues that the Future Parks Project is seeking to address and is working with local developers to look at how we can provide high quality accessible greenspace that takes some of the pressure off our key biodiversity sites whilst at the same time ensuring that Cambridgeshire remains an attractive place for people to live and work in. In ensuring that new growth leaves the environment in a better state than before, it is also important that this is applied to the historic environment as well. England's diverse cultural heritage is under constant threat from extreme weather events, development pressures and changes to land-use and agricultural practices, which any new growth should ensure puts in place measures to avoid, reduce or mitigate further harm.

Q4: Anything else to add about your vision for green spaces, nature, and biodiversity?

It is disappointing that the 'Historic Environment' is not included under the consultation questions for the 'Environment' or indeed at all in chapter 2 of 'Creating the Vision…', nor the interweaving relationship with the natural environment recognised. Human activity has helped shape the natural

environment for millennia leaving evidence, for example, in the form of, field systems, woodland management, parklands, paths, routeways, buildings, water and the biodiversity and land use activities they support. In-turn, the natural environment and its geography, climate and geology have all influenced settlement patterns, industrial processes, building design and materials and subsistence activities.

Changes to existing green and blue spaces that also contain heritage assets, e.g. through increasing visitor numbers/opening up access, will need to consider the potential challenges and opportunities for the historic environment as well as the natural environment. The siting and creation of new green and blue spaces will also need to consider such issues as the impacts upon the existing historic landscape character of the area and its archaeological remains and the opportunities for restoration and improvement works. Furthermore, opportunities to bring the natural environment into the health agenda should be explored and how we can develop a Natural Health Service through social prescribing, improving the health and wellbeing of all our local residents for existing and new communities.

Climate change resilience and net zero

Q5: Making sure new development helps to achieve net zero carbon at an Arc level towards national net zero targets. For example, through good design, sustainable travel choices, renewable energy and trapping carbon. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – In addition to the high level principles proposed by Cambridgeshire County Council that align with our climate change aspirations, we would also remind you that carbon reduction and other environmental benefits can also be achieved through sympathetic refurbishment and retrofit of existing historic buildings as well as through the construction of new.

Q6: Making sure that new development can respond to the current and future effects of climate change. For example, through new carbon emissions, water use, water disposal and renewable energy targets. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – Given the recent flooding issues and also water shortages in our county it is essential that any new development can respond to both current and future effects of climate change in relation to water management and stress, which should also take account of any implications to existing communities downstream etc. Any new development will also need to demonstrate how it will achieve the Council's aspirations for Net Zero which should be considered holistically starting with the type of housing and infrastructure proposed, so that any growth can contribute to the decarbonisation agenda from day 1. These expectations align with our high level principles set out in this consultation response and will need to be demonstrated as part of any future vision.

Q7: Anything else to add about your vision for climate change and/ or the contribution to net zero?

The climate change allowances and targets should be bold, including the Net Zero target being brought forward and wherever possible in line with the Council's aspiration for a target of 2030. A more robust approach to flood mitigation & resilience is also encouraged as identified in our responses above, and promotion of opportunities for low carbon housing & manufacturing techniques, with renewable and clean energy, grey water recycling & district wide heating to be considered on a county scale. Furthermore, ensuring that the historic environment is built into the

shared regional principles already published, with a stronger understanding of the links between the natural and historic environment will also benefit the vision for climate change and Net Zero opportunities.

Air quality and waste

Q8: Making sure new development helps to improve air quality within the Arc. For example, through high quality design, low emission zones and sustainable transport. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – It is essential that any new development seeks to improve the air quality within the OxCam Arc area and beyond. The consideration of low emission zones and improved sustainable transport infrastructure for both new and existing communities will be essential in delivering this aspiration. The County Council is particularly supportive of ways to encourage modal shift away from car use and ensuring the right infrastructure is in place at the right time to achieve this will be crucial.

Q9: Taking a combined approach to air quality across the Arc. For example, through being careful about where each land uses should go, supporting journeys via public transport and active travel and enhancing green spaces and routes across the area. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – The careful planning of land uses, alongside access to green open spaces and sustainable travel options, is particularly supported by the Council across both the OxCam Arc area and into the wider county itself. In achieving this aspiration, it will be important for the Spatial Framework to identify some of the more vunerable land uses such as schools, hospitals, care homes, play areas, local open spaces (including allotments) and residential development, so that they can be planned in from an early stage to allow air quality to be a key indicator and consideration in the planning process.

Q10: Making better use of resources and managing waste. For example, promoting the re-use of materials, and protecting and improving soil quality and minerals. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – The need to have a better use of resources and managing waste that can move the nation towards a circular economy is strongly supported by the Council. However, at present this chapter in the Spatial Framework does not reflect the principles of a circular economy and instead focuses more on waste rather than keeping resources in use for as long as possible to extract maximum value, which does not reflect the circular economy principles. Given that the SA picks up on the need to consider and support a circular economy, there appears to be a slight disconnect on this at present and it is vital for this element to be stronger in the Spatial Framework and vision moving forward. Given that the reduction and re-use of waste should be paramount to any new development, the vision and supporting SA are very light on waste reduction and re-use, as reducing the quantity of waste generated is at the top of the waste hierarchy and has a greater positive impact on the environment and carbon generation than recycling or other waste treatment technologies, we would expect to see more commitments on this theme in the Spatial Framework and vision moving forward. More detail on these concerns are provided in the comments on the SA, which includes our reservations over the statements about 'sufficient capacity' and what waste streams are being considered to obtain this view?

The protection of improving soil quality and mineral resources is also extremely light at present, and it is disappointing that neither the mineral and waste planning authority nor waste disposal authority were contacted to help inform these areas of the Strategic Framework. Given that we do not yet understand the location or quantum of growth being proposed, it is difficult to plan for the mineral and waste needs to support this vision and ensure that the benefits of joined up planning in these areas can make e.g. the use of borrow pits close to the demand with associated water storage and restoration benefits that can come with them. Whilst mineral and waste forums and industry members have been informed of this consultation, without more detail it will be difficult to get their buy-in, which if not planned correctly will lead to additional demand on existing quarries, waste treatment infrastructure and landfill sites that may not be well placed for the growth in question. Given that the mineral will be required to provide the related infrastructure for such growth, and come with opportunities for inert waste to be used in the restoration of sites, it is essential that this is planned in now.

Q11: Anything else to add about your vision for air quality and waste?

It will be important for the Spatial Framework to ensure that any new development does not increase air quality issues further afield and that infrastructure is designed into new communities from the outset to help improve air quality through clean heating in homes, electric charging points and waste recycling storage solutions to help improve recycling rates etc. Whilst it is acknowledged that waste production and treatment does not adhere to county boundaries, the waste planning authority has planned for waste management based on its own arisings, so any proposed technologies should be of a scale that reflects this principle.

Water

Q12: Promoting a combined approach to managing water across the Arc, through protecting water resources, improving water quality and reducing the risk of flooding. For example, treating wastewater, improving water storage, and reusing surface runoff. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – the OxCam Arc region is unique in the fact it is subject to both water stress and flooding. The capture and reuse of surface water for uses such as toilets and gardening etc. provides opportunities to reduce the amount of potable water used where it isn't essential. At the same time, it reduces the risk of surface water flooding by collecting water at source. The OxCam Arc region suffers from increasingly irregular rainfall and shallow run off through the catchments. A long term approach to water management is essential, and reductions in water consumption need to be a driving factor and ambition of the wider vision.

Q13: Making sure new development reduces existing flood risk and is resilient to future flooding. For example, through tree planting and multifunctional sustainable drainage. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The risk of flooding across the OxCam Arc will increase with climate change if mitigation and management isn't provided. New developments have the opportunity to incorporate measures to protect not only the new communities but also reduce the risk to existing ones. Multi-functional areas can be used for flood storage, biodiversity enhancement, amenity, education and air cooling.

There is an opportunity to be innovative in the balance between surface and foul drainage, the design and construction of houses to be 'flood resilient' and the use of natural flood risk management approaches to meeting the challenges of flooding. Such opportunities should be evident in the Spatial Framework moving forward.

Q14: Improving water availability and cutting the risk of drought. For example, through new sustainable water resources and infrastructure, and measures which reduce water use. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The risk of drought and water scarcity is increasing across the OxCam Arc. An exemplar scheme that incorporates water capture and reuse can be seen at the North West Cambridge development and similar exemplar opportunities should be designed in from an early stage as part of the vision for the OxCam Arc.

Q15: Anything else to add about your vision for water?

Whilst fluvial flooding presents a significant risk across the OxCam Arc, the risk of surface water flooding is realised more frequently with devastating impacts. The OxCam Arc presents an opportunity to enhance and include green, permeable spaces to manage surface water at source, reducing the risk of surface water flooding to both rural and urban communities.

The Economy

Education and training

Q1: Making sure the Arc keeps growing as a place of educational excellence, partnership and research. For example, through growth which helps existing universities and colleges. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The Council is fully supportive of this aspiration and already has excellent partnership and research projects with the University, so any opportunities to ensure that new development can help with this relationship is fully supported.

Q2: Making sure the economic benefits of growth are felt by all communities within the Arc. For example, through putting new education and training facilities in places where more people can easily get to go to them. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The Council is fully supportive of ensuring that new education and training facilities are provided from the economic benefits of growth in suitable locations and properly planned in as part of the Strategic Framework, where more people can easily get to them, particularly through sustainable modes of transport. However, the social contributions that schools can make in place making, often as the first public buildings within the developments, should not be underestimated or lost by only looking at economic returns, as they don't just provide school places but also a facility for wider community use and a focal point for the community in its early days and then beyond, quite often for a large part of the child's formative years.

People's health outcomes are closely linked with their social and economic circumstances. The latest Index of Deprivation (IoD) 2019 provides nationally benchmarked information on key social and economic factors The IoD for Cambridgeshire shows that a lack of education and skills is a particular issue for the Fenland population, but in all districts, apart from South Cambridgeshire,

there is one or more lower layer super output areas (LSOAs) in the most deprived 10% nationally for this measure. 28% of Peterborough's small areas (LSOAs) are in the most deprived 10% in England. Low educational attainment is linked with poorer health in later life. It means a significant number of local residents will find it more difficult to access, understand and act on information which would help them to stay healthy, and to manage their illnesses.

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

Whilst the Council is fully supportive of the principles in having the highest sustainability standards in terms of NZEB, which aligns with our climate change aspirations, and for using school grounds for managed community use, such as junior club sports, and creating habitat areas and new approaches to tree planting to green developments, reduce carbon and provide cooling and shade in response to climate changes, thereby contributing to open space in new developments; the issue of funding and viability will also need to be considered in the Strategic Framework to avoid a situation where the County Council is unable to deliver this either through a funding gap, or through negotiations with the Government/DfE policies which seek to construct within a certain cost envelope and specification for the building which do not make provision for many of these features. Developers in negotiation of contributions use these costs as the basis for discussions and newer developments are also higher density and there is also a pressure from developers to reflect this in the design of schools and the sites allocated for them (eg North East Fringe of Cambridge) where a restricted site only is available. A restricted site will not offer the same opportunity to benefit the development in some of the ways described in Q2 above, so it is important that the Strategic Framework grapples with this current dilemma and addresses this matter in its vision.

In addition to the above, the ongoing use and reuse of existing historic assets is also inherently sustainable and has low environmental impact, when compared to the construction of new buildings, which should be evident in the Strategic Framework. In developing the Vision for the OxCam Arc, consideration should be given to the scope to grow educational excellence, research and skills training in traditional building techniques. This will not only recognise the importance of traditional building skills to ensure this important sector plays its part in protecting the historic environment but will also support the OxCam Arc's green economy.

Jobs and businesses

Q4: Making sure that the Arc keeps growing as a place for business, science and technology, and innovation. For example, through putting these types of new workspaces in places where they can make the most of cross-sector collaboration. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – It is essential that the Strategic Framework understands all the local economies within the OxCam Arc, including the principles of the Cambridge Phenomenon, so that the right opportunities and complementary benefits are considered across not only the OxCam Arc area but also the whole of Cambridgeshire. An understanding of business and industry types, needs to be understood and considered when planning the future vision for the whole area. Furthermore, consideration of working patterns and types of work following the recent COVID-19 pandemic should also be taken into account, particularly when planning future communities and access to IT infrastructure etc.

Q5: Making sure that existing industries keep growing within the Arc. For example, through putting industries in the best places to suit their needs. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – As already set out in our response to Q4 above, it is essential that the Strategic Framework understands how all the existing industries and businesses function in both the OxCam Arc area and beyond, which will allow siting of new sectors in places that make the most of collaborative working and future economic opportunities for expansion and spin off companies to prosper for the benefit of all the residents of Cambridgeshire. This includes the creation of a skills vision that links into the education and training needs discussed in Q3 above.

In addition, income and employment are the two most significant domains in the IoD 'Income' domain measures, with the proportion of the population experiencing deprivation relating to low income, and the employment domain measuring the proportion of people excluded from the labour market. For deprivation related to low income, Cambridgeshire ranks 132nd least deprived out of 151 upper tier local authorities and for deprivation related to exclusion from the labour market, Cambridgeshire ranks as 135th least deprived. This means that for both income and employment deprivation, Cambridgeshire is in the 10-20% least deprived local authorities nationally, However, this masks differences between the lower tier authorities within Cambridgeshire with a higher proportion of neighbourhoods in Fenland experiencing relatively low incomes - with two LSOAs in Wisbech in the most deprived 10% in England.

Q6: Making sure the Arc builds upon and grows its skills, expertise and capabilities. For example, through making sure people can get around easily to bring the right people to the right job locations. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very important</u> – The Council is very supportive of opportunities that build upon and grow the skills, expertise and capabilities of its residents. However, to achieve this it is essential that any new development should include the provision of easily accessible, all-inclusive NMU routes to encourage and enable healthy, active travel by foot and cycle.

Q7: 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. For example, through building new flexible and adaptable workspaces meet the needs of a range of different businesses of different sizes. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – The need for the right types of buildings to be planned in from the outset is fully supported, particularly where consideration has been given to the new ways of working likely to follow the recent COVID-19 pandemic, and designs that ensure sharing of buildings and hubs for various collaboration spaces to exist are prioritised. This should also take account of sustainable and clean energy buildings that will complement the Council's climate change aspirations that are reflected in the high level principles expected from the OxCam Arc vision.

Q8: Anything else to add about your vision for jobs and businesses?

Nationally, the Heritage Sector is an important economic sector with a total GVA of £36.6bn and providing over 563,509 jobs in 2019 (pre COVID-19) (Historic England, Heritage and the Economy) 2020). Heritage employment growth outstripped the rest of the UK economy, growing almost twice as fast between 2011 to 2019. Its economic contribution to the area of the OxCam Arc should not be underestimated.

The conservation, use, and re-use of the OxCam Arc's precious heritage assets exemplify the fundamental principles of the circular economy and building back better also focuses on wellbeing and inclusivity. The renovation and restoration of historic buildings is inherently sustainable and has low environmental impact when compared to the construction of new buildings.

Connectivity and Infrastructure

Infrastructure

Q1: Making sure planning takes a combined approach to new development by providing the infrastructure and services required at the right time to support growth. For example, by planning for the need for utilities (e.g. water, energy, waste) and community infrastructure (e.g. schools, hospitals, GP surgeries). [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The Council fully supports the need for a combined approach to new development to ensure that new infrastructure and services are delivered at the right time and in the right place to support the future growth, which includes the importance of sustainable modes of transport. However, as already set out in our response to the education questions above the issue of funding and viability of new high quality sustainable schools will also need to be considered in the Strategic Framework to avoid a situation where the County Council is unable to deliver this either through a funding gap, or through negotiations with the Government/DfE policies which seek to construct within a certain cost envelope and specification for the building which do not make provision for many of the features being set out within the vision for the OxCam Arc. Developers in negotiation of contributions use these costs as the basis for discussions and newer developments are also higher density and there is also a pressure from developers to reflect this in the design of schools and the sites allocated for them (eg North East Fringe of Cambridge) where a restricted site only is available. A restricted site will not offer the same opportunity to benefit the development, so it is important that the Strategic Framework grapples with this current dilemma and addresses this matter in its vision. A similar approach to wider services such as hospitals and GP surgeries will also need to be considered, both in the evidence base, but also on the sharing or viability of such services when considered alongside existing community facilities.

In addition to the above, the need for utilities, which should also include broadband connectivity alongside water, energy and waste, are also key to ensuring that the necessary services are in place to support new communities. However, as already identified the vision on some of these matters, particularly waste, is currently very light and needs more evidence and depth being added to the Strategic Framework moving forward.

The correct provision of infrastructure to deliver housing and services needs to be a key consideration. The IoD "Barriers to Housing and Services" domain measures the physical and financial accessibility of housing and local services. Cambridgeshire ranks 44th out of 151 upper tier authorities for this domain, placing it in the 20-30% most deprived local authorities. The rural areas of East Cambridgeshire and South Cambridgeshire have the highest levels of deprivation for this measure, with East Cambridgeshire ranking in the 10-20% most deprived local authorities nationally.

Q2: Making sure new development makes the most of existing resources. For example, through making sure that materials are reused, renewable energy supplies are used, and waste is properly planned for. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – The need to have a better use of resources and managing waste that can take account of a circular economy is strongly supported by the Council. However, at present this chapter in the Spatial Framework does not reflect the principles of a circular economy strongly enough and it is disappointing that neither the mineral and waste planning authority nor waste disposal authority were contacted to help inform this section of the Strategic Framework. The need to plan for the construction waste as well as the long term waste generation by householders and businesses once development is complete will also be essential. It is vital for this element to be stronger in the Spatial Framework and vision moving forward. Given that the re-use and reduction of waste should be paramount to any new development the vision and supporting SA are very light on waste reduction and minimisation, as reducing the quantity of waste generated is at the top of the waste hierarchy and has a greater positive impact on the environment and carbon generation than recycling or other waste technologies, that we would expect to see more commitments on this theme in the Spatial Framework and vision moving forward. More detail on these concerns are provided in the comments on the SA.

Q3: Making sure that digital infrastructure is put in at the same time as other development takes place. For example, speeding up the fitting of high-speed broadband to support home-based work and help new ways of learning. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – As per our response to Q1 above the early consideration and installation of digital infrastructure to facilitate gigabit capable broadband, improved mobile coverage / capacity and assist the deployment of the Internet of Things (IoT) solutions in order to to support new ways for home-based / site working, learning, healthcare, transport and social inclusion to be implemented are fully supported. Opportunities to deliver this infrastructure from the outset and alongside other works to minimise delay to delivery, costs and the need to double dig should also be actively encouraged in the Spatial Framework. Cambridgeshire has an outstanding reputation for the delivery of high-speed broadband and work with the University and local businesses to support the use of IT, the learning from which can be used to help inform the OxCam Arc vision.

Q4: Anything else to add about your vision for infrastructure?

Delivering new or upgraded strategic infrastructure within the OxCam Arc will have an impact on various aspects of the historic environment – either on heritage assets themselves, or their settings. Existing infrastructure should be upgraded where possible rather than subject the environment to the damage inflicted by new schemes. Where new infrastructure is required, design is critical: poor design can damage historic places but conversely that which is well-designed can dramatically improve them and add to a sense of place; the Vision should encourage good design.

New development

Q5: Making sure growth within the Arc is placed around areas with better transport links. For example, through having more development around stations and bus routes, supported by cycling and walking tracks. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – The Council fully supports sustainable transport opportunities that should extend to both existing and new communities. Furthermore, new infrastructure should include the provision of easily accessible NMU routes, including public rights of way, to encourage and enable health lifestyles for physical and mental well-being, particularly in light of the recent COVID-19

pandemic. NMU routes should be all-inclusive, i.e. embrace equestrian access as well as pedestrian and cycle, providing linking arterial routes out to the countryside in accordance with paragraph 98 of the NPPF July 2021, the Cambridgeshire Health & Well-being Strategy and CCC's statutory Rights of Way Improvement Plan.

Q6: Making sure new development cuts down the need to travel around the local area. For example, through providing safe and easy walking and cycling routes to town centres, shops and schools. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – As already noted under Q5 above, the Council fully supports sustainable transport opportunities that should extend to both existing and new communities. Furthermore, new infrastructure should include the provision of easily accessible NMU routes, including public rights of way, to encourage and enable health lifestyles for physical and mental well-being, particularly in light of the recent COVID-19 pandemic. NMU routes should be all-inclusive, i.e. embrace equestrian access as well as pedestrian and cycle, providing linking arterial routes out to the countryside in accordance with paragraph 98 of the NPPF July 2021, the Cambridgeshire Health & Well-being Strategy and CCC's statutory Rights of Way Improvement Plan.

Q7: Making sure new developments reduce existing and future infrastructure demand and resources used. For example, making sure that designs leave enough space for existing and future measures which reduce energy and water use, and cut down on waste. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The Council fully supports the future proofing of new developments to take account of likely infrastructure demands and resources used to ensure that adequate space is provided that will allow the circular economy principles for waste management and areas to provide more sustainable energy and water measures.

Q8: Making sure sustainable transport principles are included in the design of new developments. For example, by designing new developments in a way that enables people to walk or cycle all or part of their journeys. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – As already noted under Q5 and Q6 above, new infrastructure should include the provision of easily accessible NMU routes, including public rights of way, to encourage and enable health lifestyles for physical and mental well-being, particularly in light of the recent COVID-19 pandemic. NMU routes should be all-inclusive, i.e. embrace equestrian access as well as pedestrian and cycle, providing linking arterial routes out to the countryside in accordance with paragraph 98 of the NPPF July 2021, the Cambridgeshire Health & Well-being Strategy and CCC's statutory Rights of Way Improvement Plan.

Q9: Anything else to add about new developments in the context of connectivity and infrastructure?

New development should take the opportunity to resolve historic severance in PROW connectivity engendered by major roads, in order to provide accessibility fit for encouraging healthy lifestyles in accordance with paragraph 98 of the NPPF July 2021, the Cambridgeshire Health & Well-being Strategy and CCC's statutory Rights of Way Improvement Plan, achievable through appropriate authorising legal events, such as Transport & Works Act Orders or Development Consent Orders with appropriate protective provisions for the local highway authority. In supporting this level of connectivity, the Strategic Framework should ensure that the future growth locations and quantum

are set first and the transport solutions and route alignments follow to avoid further connectivity issues as a result of the planning coming forward on the vision in the wrong order.

Place-making

Location of growth

Q1: Making sure new developments are built in the most sustainable locations, for the environment, the economy and communities. For example, by developing brownfield redevelopment and making sure they have good access to town centres, shops and schools. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – As already set out in response to a number of questions raised above, it is essential that the Spatial Framework is informed through local knowledge and a sound evidence base, with both the location and quantum of growth understood at an early stage to help inform key transport options, mineral and waste requirements, infrastructure provision and timing, viability, impacts on the natural and historic environment, and relationships to existing communities to include implications for water management and flood risk etc. The vision will need to be informed and based on these growth aspirations and infrastructure needs, using brownfield sites wherever possible, instead of using transport alignments to inform the growth sites that may well create segregation of communities rather than cohesion and ultimately unsustainable development where the opportunities for the natural and historic environment, including using mineral borrow pits close to the source of the need with beneficial aftercare and water storage opportunities, will be missed. Furthermore, without the ability to feed into growth areas close to the County borders, the holistic consideration across the wider Arc area won't be understood and could be to the detriment of existing communities and their residents, particularly in relation to flood mitigation and resilience, so it is important that the Spatial Framework takes these concerns into account to ensure that new developments are planned in the most sustainable locations for the environment, economy and local communities.

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

At present the historic environment is being treated as part of the place-making strand; we consider this to be limiting and contrary to a wider, more holistic, appreciation of 'environment' (i.e. both natural and historic) that is being increasingly taken. We consider this to be a fundamental missed opportunity and would urge a reappraisal of this position in order to get the best outcomes for the Arc's ambitions.

The planning system in England is based on the principle of sustainable development and heritage has an increasingly important role in supporting sustainable growth. It is a huge resource which can stimulate regeneration and growth in towns, cities and rural areas. Place-making is often best achieved through a clear understanding of the historic significance of the existing place. A variety of methods could be used to understand the Arc's existing places such as characterisation studies and 'sensitivity to change' mapping and how new development can be best joined to this. We would strongly encourage government's early engagement with the heritage sector and local communities in discussions around growth options within the OxCam Arc. Ultimately, growth areas should protect and enhance the historic environment and add to local distinctiveness which will strongly aid the successful creation of new and expanded places.

Homes in your area

Q3: Ensuring the right types of housing are delivered in the right locations to meet the needs of both renters and buyers. For example, family houses, first-time buyers, specialist housing, student accommodation and opportunities for people to build their own homes. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> - Proposals for new opportunity areas for housing should consider the character of the existing area and its surroundings and the impact which it will have on the historic environment to ensure that the housing in question is integrated well with its surroundings.

Q4: Increasing the amount and availability of affordable homes within the Arc. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> – It is essential that the Strategic Framework and vision is based on a sound and credible evidence base that is able to justify the level of growth proposed and the infrastructure needed to support it. In doing so it will be essential for the viability and affordability of homes are taken into account, particularly where supporting existing residents and key workers to find appropriate accommodation across both the OxCam Arc area and wider parts of Cambridgeshire as part of the 'levelling up' aspirations.

Q5: Anything else to add about your vision for homes in your area?

The Strategic Framework and future vision should ensure that any new homes are designed to limit their impact on climate change, including flood risk protection measures, whilst ensuring access to environmentally friendly heat generation and water consumption etc. in line with the Council's climate change aspirations and high level principles sought from the OxCam Arc. From a social perspective an appropriate mix of housing to support local needs including affordable, key worker and special needs housing including provision for older residents should also be planned in, that also ensures an ability for homes to be adapted for those with specialist needs. Furthermore, the location and type of accommodation being planned, including proposed densities, should also account for the likely infrastructure and service needs, particularly in relation to education and adult / social care demands that are particularly relevant to the County Council. In doing so, affordability and viability concerns already raised in relation to new schools should be discussed and potential solutions to the delivery of such infrastructure at an early stage should be demonstrated. Finally the need to ensure that sustainable transport is actively encouraged in the vision for homes to give both existing and future communities genuine transport choices, is also essential.

Design of new developments and streets

Q6: 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. [Not important/ Less important/ Neutral/ Important/ Very Important]

<u>Very Important</u> - New growth as part of the OxCam Arc should be based upon an understanding and analysis of each area's unique history, local character, identity and context, thus creating distinctive new neighbourhoods. Clear policies and design guides should be developed to enable development which makes a positive contribution to local character and distinctiveness.

Q7: Making sure the environment and sustainability is at the heart of new developments. For example, by improving the built and natural environment, making sure development complements surrounding areas, and is supported by the right level of infrastructure. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important - Again, the historic environment is absent from these considerations. This council has experience in incorporating heritage at the early stages of major developments in a way that engages local communities/stakeholders and informs master planning at an early stage that we would be happy to share with you.

Q8: Making sure there is the right mix of uses in new developments to help make high quality and thriving new places. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important – The need to plan for the right mix of uses, whilst also taking account of our comments in relation to the importance of new schools in the place making of new communities, is fully supported.

Q9: Making sure new developments help support healthy lifestyles for existing and future communities. For example, through walking and cycling, high quality green spaces, and accessible streets. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important - Please see our work on the Future Parks Accelerator on the opportunities from existing new and open spaces. Furthermore, all new infrastructure should include the provision of easily accessible NMU routes, including public rights of way, to encourage and enable health lifestyles for physical and mental well-being, particularly in light of the pandemic. NMU routes should be all-inclusive, i.e. embrace equestrian access as well as pedestrian and cycle wherever possible, providing linking arterial routes out to the countryside in accordance with NPPF para98, the Cambridgeshire Health & Well-being Strategy and CCC's statutory Rights of Way Improvement Plan.

Q10: Making sure new developments promote resilience to climate change. For example, through green roofs, managing surface water, tree planting, storing rainwater and new green spaces. [Not important/ Less important/ Neutral/ Important/ Very Important]

Very Important - We would encourage/promote research into alternative power generation, water storage, natural flood risk management and developing/building flood resilient homes.

Q11: Anything else to add about your vision for the design of new developments and streets?

As already noted in our responses above, access to green open spaces and the promotion of resilience to climate change is fully supported. In promoting this approach, consideration of opportunities for tree planting and biodiversity net gain, alongside sustainable transport options, should be actively encouraged. Furthermore, electric charging points, traffic free zones and pedestrian and cycling provision should be evident, as should designing in public green spaces and green corridors.

<u>Our commitment to engaging communities</u>

Q1: How can government engage the public better? [Communication materials/ Social listening/ Focus groups/ 1-1 interviews and experiments/ Ethnography/ Citizen assemblies and citizen juries/ Other types of engagement]

Engagement through local newsletters and magazines to help residents understand what is being proposed may assist with future engagement. However, until more detail is known on the vision it will always be difficult to engage at such a strategic level.

Q2: Before this consultation, I was familiar with the area known as the Oxford-Cambridge Arc. [Yes/ No]

Cambridgeshire County Council was aware of the OxCam Arc before this consultation.

Q3: Do you have anything else to add on engaging communities?

When engaging with local communities as to the Vision for and Options for Growth in the OxCam Arc, it is important to include the historic environment and recognise the potential place-making, economic, environmental and social roles it can play in a sustainable future for the Arc, as part of the consultation. Engagement with businesses and also the minerals and waste industry is also strongly encouraged once the location and quantum of growth is understood.

The consultation to-date suggests that the full potential of the historic environment is not being fully considered. For example, as set-out in section 1.20 of 'Creation the Vision…' initial consultation has highlighted that communities want a focus upon the character of places and section 1.2.1 states that initial responses were used to form this current stage of consultation and guide the data and evidence provided alongside it and shape how the Government is engaging. Yet, despite the desired focus, the historic environment and its role in creating and sustaining the character of places amongst other roles is absent from this stage of consultation questions.

Finally, restricting the word limit on electronic submissions not only penalises local authorities, but also members of the public that may find it hard to summarise or articulate their concerns or points of view, so we would recommend that this is reviewed and amended for the next round of consultation. This will also be essential in ensuring that equality and diversity issues are taken into account when ensuring that engagement allows for all Members of society, including those that don't have access to modern technology.

<u>Our commitment to data, evidence and digital tools</u>

Q1: To what extend to you agree with our proposed approach on data and evidence? [Strongly disagree/ Disagree/ Neutral/ Agree/ Strongly Agree]

<u>Disagree</u> – see our response to Q2 below that explains why we have chosen this option rather than a more 'neutral' response at this stage.

Q2: Do you have anything else to add on data, evidence and digital tools?

Section 7.7 of 'Creating the Vision' states that the Framework '*will be based on a reliable, consistent and complete evidence base… to inform policy making'*. Section 4.1 of the Scoping

Report describes the current environmental, social and economic context of the Arc based upon, '*a detailed review of environmental, social and economic issues, opportunities and challenges as well as a review of relevant plans, policies and programmes*'. Disappointingly, whilst the historic environment is included in this initial strategic context scene-setting, sections 4.6 to 4.9 focus purely upon the describing the numbers and locations of designated heritage assets which represent only c.2% of the England's heritage assets.

Figure 4.2 is misleadingly titled as 'density of heritage assets' as it only represents designated assets, neither recognising the large numbers of known non-designated heritage assets or the potential for previously unrecorded heritage assets.

We are aware that pilot projects to map the historic environment have been commissioned by Historic England. We are concerned that this represents an overly simplistic and derivative characterisation based on a narrow set of existing historic environment data. The ARC is an opportunity to proactively and holistically manage the historic environment to be benefit of existing and new residents, and we fear that a static map that will be outdated within months will limit those opportunities.

It is key that Government works with key stakeholders including Historic England, local historic environment records and local authority teams, to gather a 'consistent and complete evidence base' for the historic environment whilst at the same time recognising that not all heritage assets have yet been discovered.

In addition to our concerns about the historic environment evidence base and data, we are also concerned that an assessment of mineral requirements is not yet known, and also that not all waste streams may have been taken into account in assuming that sufficient capacity exists within the OxCam Arc area, particularly as the focus seems to be on 'collected waste' rather than all waste streams.

How we will monitor and deliver the Framework

Q1: to what extent do you agree with our proposed approach on delivery and funding? [Strongly disagree/ Disagree/ Neutral/ Agree/ Strongly Agree]

Neutral - see our response to Q2 below that explains why we have chosen this option.

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

It is essential that the Spatial Framework understands the importance of delivery timescales for developments in close proximity to each other, and the vision should seek to address how this can be controlled to ensure that developments come on stream as planned. Further information on whether the planned growth is in addition to or instead of local plan housing growth allocations that already exist and the impact this may have on the District Councils' 5 year housing land supply should also be clarified. Finally, information on how the Growth Body is planned to work and how infrastructure will be funded and delivered early on from a viability perspective, especially for new schools, should be clearly evidenced.

Monitoring and evaluation

Q1: To what extent do you agree with our proposed approach on monitoring and evaluation? [Strongly disagree/ Disagree/ Neutral/ Agree/ Strongly agree]

Disagree - see our response to Q2 below that explains why we have chosen this option rather than a more 'neutral' response at this stage.

Q2: Do you have anything else to add on monitoring and evaluation?

Given our comments and concerns raised in relation to the historic and natural environment, we recommend that any indicators should clearly relate to the Vision and Objectives/Sub-Objectives for the historic environment, the baseline for the historic environment, and any identified effects and proposed mitigation measures.

Oxford-Cambridge Arc Spatial Framework Sustainability Appraisal Scoping Report

Q1: 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? [Strongly disagree/ Disagree/ Neutral/ Agree/ Strongly agree]

Neutral – see our response to Q2 below that explains why we have chosen this option.

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

Whilst we welcome the references to the relevant documents and legislation (e.g. 25 Year Environment Plan, Environment Bill, etc.) and references to moving towards a more circular economy, where there are links to national policy priorities for eliminating food waste to landfill, reducing waste to landfill, eliminating avoidable plastics etc. that broadly align to the Environment Bill and the targets proposed in the Resources and Waste Strategy; Section 4.33 of the Scoping report states that "disposal capacity across the Arc is sufficient for current and projected populations" and "a significant proportion (51%) of waste still goes to landfill". Given the changes that are coming in the Resources and Waste Strategy that will (hopefully) increase the capture of food waste and increase the levels of recycling of both household and business waste we would question whether there is sufficient recycling, Anaerobic Digestion, and other recycling treatment capacity in the region for the amount of waste generated (Defra estimate that an additional 1.5 million tonnes p.a. of Anaerobic Digestion capacity is required in England to treat additional food waste that is likely to be required to be collected separately from households and businesses by the Resources and waste strategy). The report recognises that there is an opportunity to support improving national or regional waste management capacity for Energy from Waste (EfW) plants specifically but does not mention other forms or waste treatment technology that could also help divert waste away from landfill and that improved segregation has the potential to deliver next generation recycling facilities.

The scoping report Annex also estimates a total of 1.4 million tonnes of waste was collected in the Arc in 2019/20 but this only appears to be the waste collected by local authorities and may not include all the commercial and industrial waste that is generated in the region which also requires recycling, treatment and disposal capacity, nor the construction and demolition waste stream, that makes up a large percentage of the waste to be managed in the county. The Resources and

Waste Strategy may introduce restrictions on the exports of residual waste and recyclable materials which would also require increased waste processing capacity in the UK to compensate for the quantity of material shipped overseas for recycling.

Although there are references to sustainable production through resource efficiency the documents are very light on waste reduction and minimisation. As reducing the quantity of waste generated is at the top of the waste hierarchy and has a greater positive impact on the environment and carbon generation than recycling/EfW, we would expect to see more commitments on this theme in the Strategic Framework, and are concerned that a focus has been made on EfW plants when there is already capacity in the region and any developments proposed for heat off-take opportunities should be scaled appropriately to avoid unnecessary importation of waste. Given that neither the waste planning authority nor the waste disposal authority have been contacted to feed into this evidence base, there is a concern over the accuracy of the statements currently being made.

In addition to the waste concerns raised above, whilst we welcome that the historic environment has been scoped in and been given its own sustainability theme (1.100 of the annexe), we would also highlight a number of issues apparent in the scope of this theme as set out (table 5.1 of the report): 'archaeology' is also a heritage asset; use of 'international renown' could suggest that only designated heritage assets of the highest order will be assessed excluding the majority of heritage assets from assessment; and that only where their 'attractiveness' will be affected will this constitute an issue (again see similar in sections 1.11-1.19 of the scoping annexe). Identifying the individual heritage assets, the elements that can contribute to their significance and how this significance may be impacted should be assessed following the guidance as set out in the NPPF, NPPG and Historic England Good Practice Advice notes. This will include all types of heritage assets e.g. archaeology, landscapes, buildings of local interest, parks and gardens either within or neighbouring the Arc, not just designated heritage assets.

The range of potential issues highlighted in table 5.1 is very narrow and we would point the Government towards Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment (2016) for further guidance. The Options and Assessment Stages assessing the various options put forward and those going ahead for full assessment must include an assessment of all the potential effects upon the historic environment along with any mitigation measures identified. Cumulative effects arising from the Ox-Cam Framework and other schemes such as EWR and the works to the A428 (strategic road network upgrades) must also be assessed. Proposals for monitoring the effects should also be included.

Similarly, the list of opportunities should recognise that the historic environment can also deliver cross-cutting economic, social and environmental gains, for example, by fostering heritage-led regeneration at the same time as addressing heritage at risk or helping mitigate climate change using traditional skills. Some of the measures set out in HE04 of the annexe are useful but these have not been transferred across to table 5.1. We would however query as to how potentially the digitalisation of the heritage sector will be achieved?

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

Each county and unitary council maintains a Historic Environment Record. These hold a wealth of information on locally, regionally and nationally significant heritage assets and are the primary source of information for planning, development-control work, and land management. They can be

accessed by contacting the local authority and county council historic environment teams. At present this information has not been used in the baseline and therefore we would consider this to be insufficient.

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

It is noted that the references to the NPPF (ID reference SL05) will need to be updated in Table B.1 to take account of the July 2021 publication.

Q5: To what extent do you agree with our approach to the SA? [Strongly disagree/ Disagree/ Neutral/ Agree/ Strongly agree]

Disagree – Given the concerns highlighted in relation to the evidence base and assumptions made in relation to waste and historic environment matters, we would ask that these are addressed moving forward; and in relation to mineral and waste matters the regional bodies are approached to feed into this work. This will include industry representation, where in the case of mineral development will help to inform the wider aspirations sought by the RSPB.