



Consultation Response

CREATING A VISION FOR THE OXFORD-CAMBRIDGE ARC CONSULTATION

Department for Levelling Up, Housing & Communities

Date: 08 October 2021

Response submitted on behalf of the: **COUNTRY LAND AND BUSINESS ASSOCIATION (CLA)**

The 28,000 members of the Country Land and Business Association (CLA) are individuals, businesses and charities who collectively manage and/or own over half of all rural land (10m acres) in England and Wales and run some 250 different types of rural businesses (including agriculture, forestry, tourism, hospitality, retail). They generate jobs; they provide land and buildings for commercial investment and employment. Most of our members will pay business rates and many will rely on the reliefs provided to maintain the viability of those businesses.

Summary

The CLA agrees a regional strategy is needed to deliver a vision such as the Oxford-Cambridge Arc. The CLA is supportive of a Spatial Framework, to sit alongside the National Planning Policy Framework (NPPF), as being the best way to achieve this.

The ['Planning for sustainable growth in the Oxford-Cambridge Arc – An introduction to the Oxford-Cambridge Arc Spatial Framework'](#), published in February 2021 states that one of the 10 core principles for the Spatial Framework is ***"Inclusive – the Framework will aim to bring benefits for existing communities and all places in the Arc – not just the highest growth centres."***

The Spatial Framework consultation documents, however, fail to identify the rural economy at all, which we believe is a serious omission. The CLA would like the role and potential of the economy in the rural area of the Arc to be quantified in the Spatial Framework and the impacts on rural communities to be recognised. This currently isn't the case and with 76% of the Arc's region being farmland, rural areas represent the majority land use across the five counties but hardly get a mention.

The Oxford-Cambridge Arc offers an opportunity to approach the delivery of infrastructure in a different way. The CLA hope lessons learnt from previous schemes e.g. HS2, will be incorporated, and the opportunity taken to engage with landowners and land managers in a proactive, collaborative way, particularly when it comes to land acquisition. The default approach should be to enter into voluntary, commercially negotiation agreements of mutual benefit to both parties, and not seek to use compulsory purchase powers as the norm.

The consultation documents make the Government's ambitions for the Oxford-Cambridge Arc clear, particularly in relation to natural capital and the environment. Landowners and land

managers are the ones best placed to offer solutions to many of the challenges facing communities e.g. water resources, housing supply, transport, environmental benefits, employment opportunities etc etc. The CLA encourage the Government to recognise this and acknowledge the need to work proactively with landowners and land managers to deliver the aims of the Spatial Framework.

CREATING A VISION FOR THE OXFORD-CAMBRIDGE ARC: CLA CONSUTLATION RESPONSE

1. Introduction – Creating a Vision for the Oxford-Cambridge Arc

1. What place could it be? What words come to mind?

- Equality between urban and rural areas and communities – no disparity between economic and social support and opportunities
- Sufficient provision of rural housing to meet local needs
- A fully connected countryside – transport, infrastructure, digital connectivity
- Profitable and sustainable farming
- Exemplary focus on the environment and natural capital
- Established support for skills and innovation in the rural sector
- Long-term legacy focus (50 years +) for future development
- Planning, design and place-making leading development
- Commercially negotiated voluntary land acquisition

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

CLA's Vision for the Arc

By 2050, the CLA's vision for the Arc is to have become an exemplar region for equality between rural and urban areas where:

- the rural economy is thriving, delivering a range of high quality full time, year round jobs with competitive salaries;
- rural areas and communities are supported to grow through sufficient provision of facilities, infrastructure, services and amenities;
- housing needs of rural communities are met by delivery from within the local community;
- rural areas are fully connected in terms of transport, infrastructure and digital communications;
- local road networks, upon which rural communities rely heavily, receive the investment to ensure they are fit for purpose;
- environmental and natural capital improvements and enhancements provide the solution towards achieving a net zero target;
- farming businesses are provided with the right environment and policy framework to thrive, with delivery of food security and access to new local markets, climate change and the natural environment at their core;
- heritage assets are conserved by enhancement of their setting and character, and sympathetically re-purposed to viable uses to bring wider social, economic, and environmental benefits to communities;

- a clear and long-term skills programme is in place to help meet the goals of profitable farming and forestry, environmental land management and fast business adaptation by providing a well-trained and properly skilled workforce;
- landowners and Authorities work collaboratively to deliver successful schemes with mutual benefit;
- a long-term legacy approach is taken towards future development of the region, where planning, design and place-making is at the fore.

The Arc needs to capitalise on the region's potential and opportunities to close the rural productivity gap and allow the rural economy to thrive by creating jobs and prosperity, investing in communities and protecting the environment for future generations, whilst producing quality food.

In order to achieve this, it is paramount that rural communities and businesses are fully represented throughout the development of the Arc Spatial Framework, that these communities and their needs are at the forefront of decision-making and that fundamentally, Government seek to collaborate with the rural sector to deliver these ambitions in a mutually beneficial way to both parties.

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

There is no doubt that the Oxford-Cambridge Arc Spatial Framework offers a unique opportunity to set the direction of travel for development, infrastructure, environmental work and place-making opportunities for future generations. In delivering this, the challenges facing the rural economy must not be forgotten.

Hopes

Expansion of Rural Communities

In 2020, an opinion poll conducted by Survation for the CLA showed that Covid-19 has made 44% of those living in London more likely to want to move to the countryside, particularly given the increase in homeworking. Indeed, numerous opinion polls have suggested that a rural location is increasingly attractive for businesses and workers alike.

This shift in public opinion provides a significant opportunity for the rural economy. With more people looking to work or run their businesses from home, the increasing demand for rural homes, could present new opportunities for rural areas. If rural areas are able to grow in order to meet the increasing demand, as well as accommodate the existing need, communities, economies, and the environment in rural areas could be transformed.

Legacy Approach

Landowners and land managers often act as local drivers of the rural economy, investing in businesses, delivering jobs and small quantities of new housing for their communities and improving the environment. They will take a multigenerational view, often looking 50 years or more into the future when making land management decisions. The Spatial Framework covers the period to 2050 and in the eyes of many CLA members, a Framework covering only 27 years is too short. It is important not to lose sight that managing land and rural businesses requires a long-term approach, and the Arc is no different.

The CLA hope a longer-term approach is taken to recognise the importance of legacy in creating long-term sustainable communities with a thriving rural economy throughout the Arc which is robust and supports future generations.

Approach to Land Acquisition - commercially negotiated, voluntary agreements with landowners

With 76% of the Arc's land being agricultural, pressures on rural areas from development and infrastructure projects will be significant. Whilst the CLA advocates for a fully connected countryside, the potential for infrastructure schemes to have a detrimental impact on rural businesses must be recognised and the Oxford-Cambridge Arc offers an opportunity to approach the delivery of infrastructure in a different way.

The CLA hope a collaborative, pro-active progressive approach is taken to land acquisition, with Acquiring Authorities working closely with landowners and land managers from an early stage, these being the individuals who know the land best, to deliver in a timely manner for the mutual benefit of all parties.

This means no use of compulsory purchase powers to deliver projects and instead, Acquiring Authorities seeking to enter into commercially negotiated, voluntary agreements with affected landowners and land managers as the norm which enables rural businesses to thrive.

The CLA fears that an ambition to deliver infrastructure will result in a short-sighted approach to land acquisition, with compulsory powers being used as standard to facilitate scheme delivery. Delivering infrastructure via compulsory purchase is expensive in terms of time, money and goodwill. The adversarial nature means the process is slow, costly and drawn out. In comparison, entering into commercially negotiated, voluntary agreements with landowners facilitates delivery much faster, thereby costing less, and can include associated benefits which may not be deliverable under compulsory purchase powers.

Fears

Ignoring the Rural Economy

The CLA is concerned the Spatial Framework focuses too much on the economic prosperity of existing urban areas, for example seeking to level up Cambridge with Luton. The Framework ignores the economic opportunity present in rural areas, with the countryside being viewed purely as an area to deliver the Arc's environmental aims and seemingly continues to perpetuate the myth that the rural economy is dominated by primary industries such as agriculture, forestry and small scale tourism and associated season "tea shop" economy.

The Sustainability Appraisal Scoping Report (SASR) references the Cambridge, Oxford & London Area Green Belts as protecting 'rural space'. This suggests little recognition that an economy exists beyond urban areas which rural communities rely upon, and which holds significant potential to turn these areas into a rural powerhouse. Even before coronavirus, the rural economy was 18% less productive than the national average. Closing that gap would add an estimated £43bn to the economy, creating hundreds of thousands of skilled jobs in communities everywhere. This would be on top of the £261bn the rural economy already contributes to national Gross Value Added (GVA).

The Arc's rural economy is in fact increasingly diverse as agriculture has ceased to be the main source of employment for those living and working in rural areas. Farming businesses have diversified into other business types, creating jobs and contributing significantly to the economy.

An Arc strategy that seeks to achieve its objectives for rural communities and the environment by restricting economic development will fail the businesses and communities and the environment it is intended to support.

Failure to level up rural areas

The economy in rural areas has lagged behind urban areas. The traditional image of rural economies as dominated by primary industries (such as agriculture and forestry) and small-scale tourism is anachronistic, when in fact their sectoral composition is similar to that in urban areas.

The business base in the Arc's rural areas is not just growing, but also becoming more sophisticated, creative and innovative despite the issue of adequate broadband delivery. In spite of this, rural areas have an 18% lower productivity compared to urban areas and face a continuing skills shortage. The Arc's strategy must build on this business growth in order to close the productivity gap between rural and urban businesses.

Levelling up is not only about equality between urban areas such as Oxford and Cambridge vs. Corby and Bedford. It is also about equality between urban and rural areas for economic opportunity, connectivity and social mobility across the Arc.

The CLA would like to see the Spatial Framework's focus shift and for the rural economy to be given equal recognition.

Mapping land uses without consultation

One of the Framework's 10 core principles is 'Collaboration', with the February 2021 *'Planning for sustainable growth in the Oxford-Cambridge Arc – An introduction to the Oxford-Cambridge Arc Spatial Framework'* document stating "we will develop the Spatial Framework with local partners, including communities, local councils, businesses and universities."

The CLA are concerned that future land uses will be mapped without consultation with landowners and land managers, these being the ones who know the land best and can provide bespoke insight as to what areas are best used for.

Immediate collaboration and engagement with landowners and land managers is essential to fully understand the Arc's landscape and establish where different land uses could be placed.

Failure to deliver Arc ambitions

The Arc is an ambitious, long term plan, attempting to deliver multiple social, economic and environmental objectives. Given the complex governance arrangements; varied investment and funding sources; and the wide range of views from different stakeholders within the Arc, there is a serious risk that the Arc over-promises and under-delivers. One way to avoid this is to ensure high levels of buy-in from the outset from different stakeholders. With this in mind, the CLA is disappointed that engagement with land managers has been patchy and slow to develop.

Another risk stemming from the complexity and ambition of the Arc is that difficult decisions about land use, and the reuse of farm buildings, are not addressed. While it is possible that the multiple land uses (housing, infrastructure, green space, environmental land management and primary production of food) can all continue within the Arc area, this requires a strong spatial framework which guides all policy. Without this there is a very real risk of displacement of land

use, employment and services to other areas, including outside of the Arc. If this happens, it is likely that the easy choices will be taken, such as replacing food production with development or urban expansion at the expense of developing sustainable rural communities.

4. 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:
 • Environment • Economy • Connectivity and growth • Place-making • Supporting monitoring and delivery

The most important thing for a strategic plan is to give long-term strategic direction, providing certainty for rural businesses and communities. This will allow the necessary investment in time and resources, focused on a set of agreed goals.

As well as setting long-term goals, the Spatial Framework must find a way of making the myriad policies and governance systems that influence land use and economic development more coherent and applicable for business and communities in rural areas through the delivery of jobs, innovation, homes and services. As well as producing better and holistic outcomes for urban and rural areas, more clarity and join-up between different policies will make it easier for businesses to navigate. This is especially true of the farming and land use sector, where the competing demands of food production, environmental goals such as net zero, and the needs of development (including biodiversity net gain) are presented piecemeal, and occasionally in ways that conflict.

Finally, the strategic plan must balance the numerous competing interests in the OxCam Arc in a democratically legitimate way. This will not be easy and needs to take account both of the needs of consulting with local people but also how to incorporate the robust use of data and evidence to inform land use and development choices.

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

The CLA have undertaken our own analysis on productivity and GVA data across rural and urban areas throughout the Arc (sourced from 2017 LEP data), and have found the following:

LEP Area	GVA	Productivity (per workforce job)
Buckinghamshire	£16,395m	£56,730
Cambridgeshire & Peterborough	£43,745m	£47,584
Oxfordshire	£23,574m	£54,152
South East Midlands	£56,783m	£50,820
TOTAL GVA FOR ARC AREA	£140,497m	

The CLA have also undertaken our own analysis on the number of rural and urban businesses across the Arc (sourced from LEP data) and have found the following:

LEP Area	Rural	Urban	% split
Buckinghamshire	12,840	21,335	Rural: 37.6 Urban: 62.4
Cambridgeshire & Peterborough	39,135	44,175	Rural: 47.0 Urban: 53.0
Oxfordshire	15,855	20,510	Rural: 43.6 Urban: 56.4
South East Midlands	38,030	68,470	Rural: 35.7 Urban: 64.3

The business data above clearly illustrates the importance of the rural economy to the Arc region.

There are multiple reasons for the countryside’s lower productivity. Poor digital connectivity, an outdated planning system, unnecessary bureaucracy, and persistent underinvestment in skills and infrastructure have resulted in fewer opportunities for those living in rural areas.

It is all too often forgotten that the countryside is a mosaic of activities each with a contribution to make to the whole. The economy in rural areas is dynamic and in a constant state of change. Commercial activity, management of the countryside, the health and well-being of rural communities and the provision of services are part of one and the same picture. All depend on one another.

While land-based industries dominate the use of rural land, only a small proportion of employment and GVA is directly generated by these industries now. That does not mean the land-based sector is unimportant: it provides the context in which a whole range of other rural economic activities take place, and it maintains the rural landscape and delivers biodiversity and natural capital goods and services.

Rural businesses may conduct many interdependent commercial activities as part of their overarching business strategy on their land. This may include, for example, rental accommodation, tourism ventures, renewable energy, manufacturing, industrial, storage and warehousing and other commercial activities. This variety of commercial activities is aimed at ensuring an overall objective of sustaining a viable long-term business that seeks to balance environmental objectives with the economic well-being of the countryside and the provision of job opportunities, as well as housing, for local communities. But these businesses and communities have the potential to be even more successful with additional job creation, sustainable villages and enhanced rural vitality.

A broader economy in rural areas that delivers a range of full-time jobs, with competitive salaries, will be infinitely more robust and sustainable, than the seasonal “tea shop” economy that is favoured by many planning authorities and some stakeholders.

2. The Environment

Green Spaces, nature and biodiversity

1. Making sure the natural environment is protected, restored, and improved. For example, improving new and existing green spaces.

Important

2. 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.

Important

3. 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.

Important

4. Anything else to add about your vision for green spaces, nature, and biodiversity?

The Spatial Plan and the OxCam Arc project need to recognise the existing policy drivers that help to deliver green space and space for nature. Agri-environment schemes are a tried and tested mechanism by which farmers and land managers can be rewarded for managing land in ways that benefit the environment. The move, following Brexit, towards the new Environmental Land Management (ELM) schemes will continue this tradition. How ELM funding is directed within the Arc will have a strong influence on the ability to manage the countryside and deliver environmental outcomes. The same is true of other policies and programmes such as biodiversity net gain and local nature recovery strategies (LNRS), Catchment Sensitive Farming, and the increasing amount of private sector investment in the environment and natural capital. The introduction of new LNRS will help to direct funding and policy efforts towards environmental outcomes. These will be developed by local authorities and consideration should be given as to how they will be linked across the Arc. Some of the CLA's concerns around the disconnect between national environmental policy and the levers available at a local and regional level apply to the Arc as well as individual LNRS.

It is important to note, in relation to question 2, that improvement to the natural environment and public access to it are not inextricably linked. In fact, there are occasions when the goals of environmental benefits and public access and enjoyment conflict. This has previously been recognised in the provision of green space for recreation, which is not situated in the same places as our more important wildlife habitats. The CLA is in favour of incentivised, voluntary and permissive public access, but there are many situations when greater access will not be appropriate.

It is important to balance the need (and potential) for economic growth with environmental interests. Implementing biodiversity net gain on new development is important for this. The CLA strongly believes that delivery of net gain outside of the development site will often allow better

outcomes. This allows developer funding to be pooled and directed towards those sites where the most impact for nature can be delivered.

Climate change resilience and net zero

5. 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.

Important

6. Making sure that new development can respond to the current and future effects of climate change. For example, through new carbon emissions, water use, waste disposal and renewable energy targets.

Important

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

There is a lack of focus within the consultation documents on the role of non-developed rural land e.g. farmland, woodland, pasture etc. in delivering net zero emissions. Nature-based solutions, carbon offsets and green finance all have a part to play in reducing emissions. Alongside other approaches, which rely on reducing emissions from our houses, energy and transport, rural land can sequester carbon from the atmosphere. Well-managed soil, grass fields, hedgerows, woodlands and wetlands can all help to remove carbon as well as providing other social, economic and environmental benefits.

The Arc vision should therefore include helping to develop public and privately-funded nature-based solutions to climate change across the region. This would involve engaging with local carbon-emitting businesses to think about how they can both reduce their own emissions and off-set any that remain. There is also scope to support local food production and the use of UK-grown timber in construction as a way to lower emissions.

Air quality and waste

8. Making sure new development helps to improve air quality within the Arc. For example, through high quality design, low emission zones and sustainable transport.

Important

9. 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.

Neutral

10. Making better use of resources and managing waste. For example, promoting the re-use of materials, and protecting and improving soil quality and minerals.

Important

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

Air quality can be improved by nature-based solutions, namely trees, which also have benefits for biodiversity, climate change and flood risk prevention. As such there should be scope to incentivise land management that can reduce air pollution. Because this can have multiple beneficial outcomes it is important to allow for “stacking or bundling” of environmental outcomes and payments – so that land managers are rewarded for the multiple benefits delivered.

Improving soil quality is also important, and this is not just about avoiding or rectifying contamination of land. Healthy soil has scope to deliver carbon sequestration, flood risk prevention and biodiversity benefits. Government ELM schemes and private carbon markets both have a role to play in improving soil quality.

12. 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.

Very Important

13. Making sure new development reduces existing flood risk and is resilient to future flooding. For example, through tree planting and multifunctional sustainable drainage.

Important

14. Improving water availability and cutting the risk of drought. For example, through new sustainable water resources and infrastructure, and measures which reduce water use.

Very Important

15. Anything else to add about your vision for water

Landowners have a role to play in reducing the risk of flooding, increasing resilience to drought and improving water quality. [The CLA Water Strategy: a vision for the water environment to 2030](#) policy paper sets out our vision for water management, highlighting the role of Nature Based Solutions such as Natural Flood Management. These projects can involve creating wetlands, or planting trees to stabilise riverbanks, with the aim of slowing the flow of water, helping it to be absorbed, while also improving biodiversity, water quality, water availability and carbon storage.

Water is also vital for agriculture and other production and there should be investment and support for ensuring enough water provision in the Arc for the necessary agricultural activities, including investing in reservoirs, continued sustainable abstraction and irrigation systems.

3. The Economy

Education and Training

1. 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.

Very Important, especially links with local businesses thus bringing research into reality.

2. 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.

Very Important, together with new businesses opportunities.

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

The ability of the workforce to re-train and re-skill will be crucial to improving productivity. As such, it is important to underline the role played by education, both at the tertiary and adult level.

For businesses to thrive, they need a well-trained and properly skilled workforce. Rural businesses are no different. We need a clear and long-term skills programme to help meet the goals of profitable farming and forestry, environmental land management and fast business adaptation.

Businesses must also be confident about using the latest digital technology and have the ability to exploit its potential. Small and medium-sized enterprises (SMEs) decision makers, of which many are CLA members, are often non-specialists in ICT and can have very limited technical understanding of the communications products and services available. SMEs need to be able to tap into a range of relevant digital skills, become more aware and use technology to improve the productivity of the business. The Government needs to undertake an audit of what digital skills and what digital upskilling are available. Where further provision is required, funding through the UK Shared Prosperity Fund should be made available.

In addition to business and economic skills, the rise of the green economy and the role of land managers as set out in the previous section mean there is a need for environmental and land management training. Land managers have the potential to deliver a range of environmental benefits, supported by the right policy and incentives system. In order to do this they will need to build capacity in areas such as ecological data gathering, environmental land management and natural capital planning. While for some this is a core part of their business already, further investment in advice, training and skills will help deliver a green recovery.

Jobs and businesses

4. 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.

Very Important – the aspirations for growth must extend, equally, to the rural areas. Landowners and land managers are likely to assist in the delivery of new workspaces through the change of use of farm buildings or creation of new business space. It is key that the planning system allows them to do this.

5. Making sure that existing industries keep growing within the Arc. For example, through putting industries in the best places to suit their needs.

Very Important – it should be recognised that existing industries within the Arc include agriculture and forestry and over 250 different types of diversified rural businesses.

It is also important that the infrastructure necessary to locate industries in the places best suited to their needs is installed in time to allow this to happen.

6. 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.

Very Important

7. 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 meeting the needs of a range of different businesses of different sizes.

Very Important – it should be recognised that rural businesses form a significant part of the Arc's economy and making sure the right types of buildings are provided so that they can keep growing is essential. This will therefore include buildings for agricultural and forestry use and diversified rural businesses, but also the need to make the best use of existing buildings.

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

The Spatial Framework must recognise that rural businesses need to grow. All too often, business growth is hampered, whether that be through restrictive planning policies or the overzealous interpretation of regulations. We are not saying that the market should be permitted to determine all development activity but it is important for the right balance, through a lighter touch regulatory system, be achieved to allow for genuine and sustainable economic growth.

4. Connectivity and Infrastructure

Infrastructure

1. 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).

Very Important

2. 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.

Very Important

3. 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.

Very Important

4. Anything else to add about your vision for infrastructure?

Digital connectivity is vital to growth and the dynamic for the economy to adjust and then grow. One of the major issues facing the OxCam Arc is ensuring that there is sufficient digital infrastructure in place so that rural businesses can play a fundamental role. However, it is important to recognise that there will be challenges, particularly in terms of speed of deployment. According to Ofcom, 44% of rural premises in England have access to 4G, compared to 87% in urban areas. This means that a strategy needs to be developed in order for connectivity to be delivered on time. One of the biggest frustrations felt by rural businesses and communities is the delay by infrastructure providers in putting in place effective networks. Landowners have a role to play in assisting providers through the implementation of wayleaves and civil engineering.

In addition, ensuring digital infrastructure is installed at the same time as other development takes place is very important for rural communities and businesses, based on an increasing number of people moving to the countryside who will be relying on all forms of connectivity. According to a 2018 report, unlocking the digital potential for rural businesses across the UK could increase Gross Value Added (GVA) by between £12bn and £26bn per year and increase turnover by between £15bn to £34bn per year.

The short-term movement of younger people from cities to the countryside as a result of the pandemic must be capitalised on in the long-term. This means that it is critical for rural areas to have the facilities, infrastructure, services, and amenities the younger generation want so they continue to stay in the countryside past the pandemic.

The [CLA's Sustainable Villages report](#) identified that infrastructure and connectivity in the form of transport and broadband are a major factor for rural areas and their sustainability.

It must also be remembered that infrastructure not only relates to rail and road, but includes other services such water and sewerage, electricity and grid connections, gas supply etc.

New development

5. 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.

Important, but there is also a need for new routes

6. 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.

Important, but also be realistic about linking further afield

7. 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.

Important

8. 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

Important

9. Anything else to add about new developments in the context of connectivity and infrastructure?

The Arc will bring many opportunities, including new developments in rural areas. Development in the rural hinterlands are likely to be new small-scale developments in or around rural villages, up to 10 homes or new commercial and agricultural development.

A presumption in favour of sustainable development underpins the NPPF. [The CLA's Sustainable Villages report](#) identified that sustainability assessments used by local planning authorities measure villages against a range of services and amenities more akin to how previous generations lived and used services. For example, the report found that only 18% of local authorities analysed the by the CLA included the availability of broadband in their sustainability assessments and that funding cuts had led to a reduction in public services.

The planning system continues to overlook the need for development in smaller, rural settlements due to being deemed 'unsustainable' in local plans. Unsustainable villages are not allocated housing and have very limited development options to improve their sustainability. This inequality has resulted in the loss or reduction of key rural services and amenities, such as public transport, banks, schools, and pubs which continues to hold back the economies in rural areas.

Organic, incremental growth in rural areas is critical for rural renewal, for levelling up the economy and for diverse, sustainable, and resilient communities and the CLA would like to see:

- Local authority sustainability assessments being reformed, to place greater emphasis on digital connectivity in recognition of the services which can be accessed online; and to assess what services could be supported if development were enabled.

- Local planning authorities being mandated to undertake a Housing Needs Assessment across all rural settlements without a housing allocation so that identified local need can be met at a local level.

Getting around

10. Creating better transport connections across the Arc and making sure they are provided in a way which supports sustainable new growth. For example, by planning for public transport and physical transport infrastructure requirements.

Very Important

11. Making sure there are more opportunities for active travel such as walking and cycling across the Arc. For example, wider pavements, segregated cycle lanes, improved network of cycle lanes, and better pedestrian crossings.

Neutral

12. Making sure that there is the right form of public transport in the right areas across the Arc and can be used by all travellers, including people with any particular needs.

Very Important

13. Cutting down on the impact of cars and other private vehicles within the Arc. For example, by supporting more sustainable forms of private travel like cycling.

Neutral

14. Anything else to add about your vision of getting around?

It should be recognised that rural communities within the Arc rely heavily on single-carriageway local road network. This is unlikely to change significantly and investment in the local road networks to make them fit for purpose is key to ensuring these communities are able to access services, opportunities etc.

It should also be recognised that development in rural areas will be delivered differently compared to its urban counterparts and have different infrastructure needs.

The provision of pavements, cycle lanes and pedestrian crossings together with public transport and other sustainable forms of travel are not common place in rural areas. If it is the Arc's ambition to create communities where provision of such connectivity is the norm, then a realistic approach on how this is applied to rural areas is needed to ensure rural businesses are allowed to grow, and to prevent these communities from being disadvantaged due to a lack of such infrastructure/connectivity.

5. Place-making

Location of growth

1. 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.

Neutral

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

Growth in rural areas has suffered from too narrow an interpretation, the outcome being to prevent much needed organic growth, economic development and new housing in rural areas because there is, for example, “no bus stop” – an oft-quoted reason given for refusing rural diversification planning applications and being considered ‘unsustainable’. Whether an area is well served by public transport is another local authority consideration and often cited as a reason for refusing development.

Paragraphs 84 and 85 of the NPPF are of paramount importance for the growth of rural communities, as these are places which are not well served by public transport, often with no provision of pavements, street lighting etc. It should be remembered that rural areas have sparse access to public transport and planning applications for small-scale development in rural areas to support the local economy should not be refused on the basis there is no public transport – this itself having resulted from an inability to deliver organic growth due to the area being considered ‘unsustainable’. The Arc’s vision should seek to support growth in rural areas by delivering the jobs and homes critically needed in these locations – it should not prevent new development in rural areas.

Paragraph 8 of the NPPF makes clear that sustainable development revolves around economic, social and environmental objectives, these being interdependent and should be pursued in mutually supportive ways. This is critical in rural areas where businesses, communities and the rural environment are of equal importance.

The Spatial Framework should reflect the NPPF, in that it should be recognised that sites to meet local business and community needs in rural areas may be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

The contribution heritage assets can make to the rural economy should not be overlooked. Many landowners own and manage heritage assets which can be sympathetically re-purposed to viable uses to bring wider social, economic, and environmental benefits to communities. The NPPF recognises this at paragraph 190 and the Framework should recognise this too.

Homes in your area

3. 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.

Very Important

4. Increasing the amount and availability of affordable homes within the Arc.

Very Important

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

The pricing out of the younger generation has resulted in rural areas ageing faster than other parts of the country, yet with the least provision of suitable homes for the elderly. The loss of diversity in rural areas continues to contribute to the closure and loss of key services and amenities, which will only be exacerbated by the pandemic.

For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes, which includes different tenure types of varying sizes. The existing lack of homes in rural areas prevents young families to continue to live in their community, key workers to be based near to their places of work and the elderly to downsize.

More should be done to prioritise policies which ensure socio-economic benefits are not being overlooked in favour of other objectives such as restricting development just outside of settlement boundaries. New housing at the right scale in the right location is vital to sustain communities and unlock economic growth.

For small rural settlements (i.e. <3000 inhabitants) within the Arc region, the CLA makes the following recommendations:

- Local authority sustainability assessments should be reformed, to place greater emphasis on digital connectivity in recognition of the services which can be accessed online; and to assess what services could be supported if development were enabled.
- Local planning authorities should be mandated to undertake a Housing Needs Assessment across all rural settlements without a housing allocation so that identified local need can be met at a local level.

Small rural settlements are often categorised as 'unsustainable', resulting in no housing allocation in local plans. The Arc vision for growth therefore needs to recognise the important of Rural Exception Sites in rural housing delivery, and include small quantities of affordable and other types of housing to allow for organic growth of small rural settlements.

Design of new developments and streets

6. 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.

Very Important

7. 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.

Very Important

8. Making sure there is the right mix of uses in new developments to help make high quality and thriving new places.

Very Important – rural communities need to be sustainable by both providing job opportunities and housing. As type and tenure of housing is often determined through a housing needs assessment, the right mix of uses in new developments could also be established this way.

9. 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.

Very Important – but it should be recognised that narrow rural lanes can be dangerous for cyclists/horse riders/pedestrians as limited space means pavements and street lighting is not common and rural areas rely on cars and road haulage to support rural businesses and communities. The Framework should not penalise new development in rural areas due to an inability to provide accessible streets.

10. 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.

Important – new developments should follow the former MHCLG's Future Homes Standard to ensure new homes have a high level of energy efficiency and are futureproofed with low-carbon heating systems.

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

Sustainable communities are places where people want to live and work, now and in the future. They meet social needs, promote economic success, and protect and enhance the environment. Communities must have the opportunity to grow and develop in order to continue to be sustainable. The Taylor Review (2008) sums it up well: 'sustainable development is about action, not just maintaining the status quo, and it's about more than just the environment, it has to address environmental, social and economic issues together.'

The assumption that a lack of services means that smaller rural communities are unsustainable for new homes is damaging, actively diminishing the sustainability of these settlements. If sustainability was at the heart of planning decision making, then these settlements would be able to grow to meet social needs, promote economic success and protect and enhance environmental objectives.

Rather than local authorities assessing rural settlements on what services they do not have, especially when so many have been lost, settlements should be assessed on what services could be supported if development were enabled whilst taking much greater account of digital

connectivity. The shift in emphasis to support incremental, organic growth in smaller rural settlements is fundamental for the sustainability of rural communities.

6. Our commitment to engaging communities

1. How can government engage the public better?

In order for the Spatial Framework to be successful, it must recognise and encompass the views of all communities within the Arc. With 76% of land within the Arc being agricultural, it is clear that rural communities are at its heart and need to be heard.

The CLA has formed a member-led OxCam Arc Working Group with representation throughout all five Arc counties and types of rural businesses. This Group would welcome the chance to meet with Government to tangibly illustrate the points detailed within this consultation response and provide insight as to how rural communities and the rural economy will be affected by these proposals.

Poor connectivity can be a barrier to digital engagement with rural communities and therefore it is important to engage with rural communities in person via workshops, roadshows, focus groups and individual site visits to gain a clear understanding of the challenges these communities face and how the Arc can help alleviate these. Liaising with Parish Councils within the Arc would also be beneficial.

2. Before this consultation, I was familiar with the area known as the Oxford-Cambridge Arc.

Yes

3. Do you have anything else to add on engaging communities?

There has been a noted absence of engagement with landowners and managers on the OxCam Arc, even though privately owned land makes up a large proportion of rural land. As mentioned above, engagement with farmers and land managers can be difficult due to the nature of the sector but this does not mean it should be over-looked. The CLA believes that additional support and methods are needed to understand what land managers are already doing on the ground; engage them in the Spatial Framework process; and gather ideas from them about what more they could do to meet the objectives of the Arc.

In addition, it is paramount that rural communities and businesses are fully represented throughout the development of the Arc Spatial Framework, that these communities and their needs are at the forefront of decision-making and that fundamentally, Government seek to collaborate with the rural sector to deliver the Arc's ambitions.

7. Our commitment to data, evidence and digital tools

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

Agree

2. Do you have anything else to add on data, evidence and digital tools?

It is important that data and evidence is accurate, up-to-date and ground-truthed against reality. CLA members unfortunately have experience of decisions being made based on inaccurate data. Land managers often have access to their own sources of information, both formal and informal sources, which can help contribute to a richer picture of what is happening on the ground. Many land managers are beginning to undertake natural capital assessments of their land holding, with a view to better informing their management decisions. This trend should be encouraged within the Arc. The CLA believes that the Environmental Land Management scheme should be funding land managers to gather environmental data about the land they manage. This will have a benefit both for land management businesses and for wider society.

8. How we will monitor and deliver the Framework

Delivery and funding

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

Agree

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

The CLA agree with the principle of establishing an Arc Growth Body as a delivery mechanism for investment priorities.

Some of the delivery and funding mechanisms needed to achieve the Arc objectives are implemented or delivered by national bodies and through national policy e.g. Environmental Land Management schemes, and other environmental policy e.g. setting of targets. The Arc therefore needs to recognise this and co-ordinate with those associated Government departments.

Funding for environmental benefits comes from a number of sources including local, regional, national bodies and the private sector. The Arc needs to take advantage of new opportunities to combine different income streams to deliver nature based solutions and other environmental projects on the ground. If the Spatial Framework and underlying LNRS secure the buy-in of public and private sector bodies with interests in delivering environmental improvements, then the Arc has the opportunity to ensure money is directed to where the best environmental impact can be found.

Monitoring and evaluation

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

Agree

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

The CLA are concerned that there appears to be little consultation and dialogue with the Department for the Environment, Food and Rural Affairs (DEFRA) particularly given the scope of the consultation exercise. DEFRA has made it clear that policies from other Government departments need to be rural proofed to ensure that these communities and businesses are represented within Government. Links are especially important for the extraction of data about those rural areas and hinterland that make up the geography of the Arc. We therefore, strongly advise that the Department for Levelling Up, Housing and Communities discuss the data requirements as set out in this consultation not only with regional and sub-regional bodies but also with DEFRA as we are aware that there is rural data held by DEFRA that will be of particular interest for the Arc.

The CLA agree that a process to monitor and evaluate the Spatial Framework to ensure it continues to deliver its objectives on the ground is essential. As the Framework is implemented, changes will need to be made to ensure the Framework remains relevant and current. Ongoing engagement with the Arc communities will be key to understanding what changes need to be made to support ongoing successful delivery on the ground.

SUSTAINABILITY APPRAISAL SCOPING REPORT – CLA CONSULTATION RESPONSE

1. 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 agree, except for the lack of recognition of the rural areas and rural businesses

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

Yes:

Labour

It is noted in the Spatial Framework consultation that labour demand is high. It is very much the case that the Arc is home to a myriad of different businesses and economic activities where skilled labour is at a premium. However, there also needs to be a recognition that labour availability, post the UK exiting the EU, is finite. Our view is that this will act as a significant drag on economic potential for the Arc.

Pending resolution at the national level, meeting labour needs and requirements through a domestic workforce will take time. We have already stressed the importance of education, skills and training but as the economy moves to meet the objectives of the green agenda, a reappraisal of labour availability, with a flexible approach, is required. Without such an approach, economic activity will inevitably be hampered.

Landscapes and Land Use

The SASR identifies 'Land use and landscape' as a proposed Sustainability Appraisal theme and the opportunity to 'protect and enhance landscape character'.

The consultation documents don't appear to recognise those businesses, landowners and land managers who own and manage landscapes throughout the Arc, nor acknowledge that these communities are the ones best placed to deliver solutions to many of the aims of the Spatial Framework and the need to therefore work with them closely to achieve these ambitions.

Our most valued habitats and landscapes have resulted from the practices and resources of successive land managers who have managed the landscape for a variety of reasons: water management, biodiversity, habitat creation, soil management, business diversification, community benefit etc, etc.

Rural areas are changing, working landscapes, and can only be sustained by appropriate positive management which is best delivered by viable agricultural, forestry and rural businesses. The rural economy is multifunctional, diverse, and dynamic, and is no less subject to change than its urban counterpart. The rural economy requires development to modernise, like with any modern business.

The future of our landscapes and the economic success of our rural areas are inextricably linked. A well-managed landscape enriches the nation's heritage, but is also an attractive backdrop for the much-needed inward investment and tourism and leisure activities. But the landscape is not a free good; its management uses resources which have alternative uses and value. The Spatial Framework should not seek to protect landscape and land uses to the extent that it becomes a barrier to development and investment in the countryside, rather the Spatial Framework should actively promote economic development in the Arc's rural areas as being as being a catalyst for innovation rather than a barrier to change.

Access

The SASR suggests that many parts of the Arc's natural environment are relatively inaccessible to the public. It must be recognised that the most biodiverse areas are those with no public access. Balancing public access with the environment is a challenge and as custodians of these areas, landowners and land managers are the ones at the forefront, facing these issues. They are therefore the ones who are in the strongest position to provide a solution and the CLA therefore call upon the Government to recognise this and proactively engage with the sector.

Water

Water demand and infrastructure has quite rightly been listed as a theme within the SASR. The CLA is aware of Thames Water's proposals for a reservoir near Abingdon, Oxfordshire but are unaware of the current state of this project, however previous plans have suggested the scheme will sit within the Arc region. The location of reservoirs within the Arc should form part of the wider considerations regarding water, and the CLA encourage the Department for Levelling Up, Housing and Communities to engage with organisations such as Water Resources East to seek their input into water management across the Arc.

Historic Environment

It is important that heritage is taken fully into account in planning for the OxCam Arc. NPPF paragraph 190, which sets out the role heritage should take in plan-making, is worth quoting in full:

190. *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- (a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- (b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- (c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- (d) opportunities to draw on the contribution made by the historic environment to the character of a place.*

The consultation documents, although they do refer to opportunities, are in places too inclined to see heritage as a fixed entity to be protected from change. It is important that development does not cause unjustified harm to heritage or its setting, and strong national planning policies exist to ensure that, but it is also important that heritage is not seen primarily in a negative way, as a barrier to development. As the NPPF says, there are many opportunities to conserve

heritage, enhance it and its setting, add to character, and bring wider social, economic, and environmental benefits. It is important that those opportunities are seized.

Rural Economy

Economy is a theme within the SASR and identifies the need to address inequalities across the Arc to achieve equality of opportunities for economic growth. It should be recognised that such inequality is prevalent across the rural-urban divide, not just between towns and cities across the Arc and the need to therefore recognise the rural economy into the Sustainability Appraisal (SA).

Transport

The Transport theme within the SASR doesn't seem to recognise the transport challenges rural areas face. There appears to be little acknowledgement that in remote rural areas, use of cars and road haulage is a necessity owing to the lack of public transport. The CLA would like the SA to recognise the unique needs of rural communities and acknowledge that these will differ from urban areas.

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

Yes – available through the LEP network.

DEFRA has access to LEP data on areas such as productivity in rural areas, deprivation, broadband coverage and general economic data. DEFRA has, in the past, analysed this data to provide a statistical evidence base. Given the range of data available from both LEPs and local authorities (as well as the number of these in the Arc area), DEFRA and the Department for Levelling Up, Housing and Communities need to work together to fully utilise this data source.

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

Yes – engagement with DEFRA, particularly regarding future environmental land management policy - see above response to Q2 under 'Monitoring & Evaluation' section.

5. To what extent do you agree with our approach to the Sustainability Appraisal?

Agree but – the CLA agrees with the SA themes listed but recognition of the rural economy and communities throughout the Arc needs to be much stronger. 76% of the Arc's land is farmland, which by definition makes clear that the majority of communities across the Arc are rural. These communities face unique pressures in terms of employment, housing, transport, infrastructure, the environment, water, labour etc etc. These challenges and the needs of these communities need to be recognised within the Spatial Framework.

The Arc provides a unique opportunity to address the inequality between rural and urban areas and the CLA would like to see the Framework acknowledge this divide and seek to use the Arc to address this and level up all parts of the Arc to enable the rural economy and communities to benefit fully from the positive opportunities the Arc could bring to the region.



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