



Contact: Matt Thomson  
Tel: 01844 355507  
Email: [planning@chilternsaonb.org](mailto:planning@chilternsaonb.org)  
Web: [www.chilternsaonb.org](http://www.chilternsaonb.org)

Chairman: Mr Paul Mains BEM  
Vice Chairman: Mr John Nicholls  
Chief Executive Officer: Dr Elaine King

**By email only to [oxford-cambridgearc@communities.gov.uk](mailto:oxford-cambridgearc@communities.gov.uk)**

My Ref.: F:\Planning\Responses\

Dear Sir/Madam

### **Creating a Vision for the Oxford Cambridge Arc consultation**

The Chilterns Conservation Board is grateful to have been consulted on the Vision for the development of the Oxford Cambridge Arc. In addition to the formal consultation, we took part in the programme of internet-based workshops, and we would be very grateful to continue to be involved in developing the plan for the Arc.

We found the facility for submitting comments on the Vision consultation to be inappropriate for making our response, and frustrating too. For example, the multiple choice response to Q1 included an "Other – please specify below" option, but no box to specify in. Q2 asked for us to share our vision, but (in common with many other free text boxes in the survey) only gave 500 characters (less than two tweets) to do so. There also did not appear to be a means to save responses between sessions. It was very difficult to identify how else to respond to the consultation from the materials provided.

The attached response is made by officers in the context of the outcome of a discussion about the Oxford Cambridge Arc at a meeting of the Board's Planning Committee in November 2020. Please note that the response seeks to influence the vision, and hence the overall strategy, for the development of the Arc region, but the Board does not have a definite view on whether it agrees with the principle of significant growth in the region – there remain many questions about the nature and scale of growth envisaged, and it remains possible that growth in this region could lead to unnecessary harm to the Chilterns AONB.

/contd.

We have confined our response to the first three consultation questions, supplemented by a general comment on the remaining thematic questions. I trust that this is in order. Please do not hesitate to contact me if I can be of further assistance.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'M Thomson', with a long horizontal flourish extending to the right.

Dr Matt Thomson MRTPI AoU  
Planner, Chilterns Conservation Board

cc.

## Creating a Vision for the Oxford Cambridge Arc consultation – response from the Chilterns Conservation Board

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

(Options: Sustainable | Sense of community | Equal / Inclusive | Progressive | Collaborates for better outcomes | More life opportunities | Better environment | Eco-friendly | Connected | Better transport | Better infrastructure | Thriving economy | Better place | Better homes | More available homes | More affordable homes | Other - please specify below)

Other – All of the above, plus “landscape-led” and “promoting local distinctiveness”. However, we would ask what, if anything, any of these words add over what is already required by the policies of the National Planning Policy Framework (NPPF). The Vision for the OxCam Arc should provide added value that is specific to the region, and not merely repeat existing national planning policy. This is a theme that runs throughout the current consultation.

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

The Vision must be regionally- and locally-specific, reflecting the aspirations of its communities as well as the development of the region, and not just repeat established policy from the NPPF.

The Vision must be for the OxCam region, and must account for the intended roles for all parts of the region, specifically. What will be the role for Oxford, Aylesbury, Milton Keynes, Luton, Northampton, Peterborough and Cambridge? What will be the roles of other towns across the region? What will be the (often overlooked) role of the rural areas?

The Vision should emphasise that the Arc is its own economic space – a thriving, prosperous, growing economy that is separate from London, which:

- a) as part of the levelling-up agenda looks as much to the Midlands and the North as it does to the capital
- b) as part of the post-EU context, recognises the Solent, Severn, Mersey and Humber for its exports as much as the Kentish ports, and
- c) in the context of Covid-19, the climate emergency and the biodiversity crisis places more critical importance on the robust and permanent protection and enhancement of its open spaces than ever before.

The Vision for the Arc should highlight as one of its starting points the landscape-scale assets represented by its designated Areas of Outstanding Natural Beauty, the Cotswolds, the North Wessex Downs and of course the Chilterns. These (along with, arguably, the Cambridgeshire Fens) are social and economic, as well as environmental, assets whose exceptionally high quality natural and cultural heritage are responsible for a significant proportion of what makes the Oxford-Cambridge region such an attractive place in which to live, work and spend leisure time. It is no coincidence that the Cotswolds and the Chilterns were paid special attention in the Landscapes (Glover) Review, and the long-term vision for the Arc should specifically aspire to enhancing the status of these nationally important landscapes to the 21<sup>st</sup>

century equivalent of National Parks. These areas should explicitly be treated as assets for the region's well-being and not as inconvenient constraints on development that may only be expedient in the short-term.

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

Planning for the Arc could have provided a context for a single spatial framework for the whole of the Chilterns AONB (an aspiration of the Chilterns Conservation Board that was also reflected in the recommendations of the Landscapes Review (the "Glover Review")), but this opportunity has been lost by the exclusion of Hertfordshire from the Arc. This exclusion is irrational given:

- a) The proximity of Hertfordshire to several of the key towns and cities that will be the focal point for economic activity and growth in the region (including Cambridge, Milton Keynes and Luton) and the existing intimate relationships between those places and communities within Hertfordshire;
- b) The fact that many of the routes of connectivity between the Arc's towns and cities – including between Oxford and Cambridge – necessitate the use of transport and other infrastructure that passes through Hertfordshire, and that investment in infrastructure to support the region will be required in that county; and
- c) The sub-national transport body for the Arc region, England's Economic Heartland, includes Hertfordshire, but the Arc itself does not.

Overall our biggest concern is that growth in the Arc will end up being merely satellite growth supporting the ever-growing influence of Metropolitan London, with homes being built across the region in response to demand that is associated with the continued unsustainable economic growth of central London, resulting in the need for more new and expanded transport infrastructure between the Arc and the capital, which will inevitably need to run through the Chilterns AONB, adding to the desecration of parts of the AONB that is ongoing as part of the construction of HS2.

### Other questions

All of the other questions in the consultation merely ask respondents to rank in order of importance planning policy objectives that are already requirements of the National Planning Policy Framework, all of which should already be applied to all new development anyway. Even without a plan for the Arc significant growth is likely to happen in the region in a piecemeal fashion (as is indeed already the case) in accordance with the current NPPF. The vision must add value, and the plan for the Arc must find a way to ensure that all development in this high-tech, knowledge-driven economy exemplifies very best practice – and indeed pushes the boundaries of best practice – with regard to the step change that is urgently needed to achieve net zero, reduce the need for physical travel, address the biodiversity crisis and retain strategic-scale areas of natural and cultural heritage that support our physical and mental health and well-being, as well as our economy and the future of the planet. Business as usual is not an option here.

In our view this means that the Arc should take a stronger position on the following issues even than is currently expected (but very frequently not delivered) by the current policies of the NPPF:

- a) The conservation and enhancement of protected landscapes – development (at whatever scale) in AONBs (and on greenfield land in their settings) should never be justified on the basis of need or demand arising outside of the protected area, and the plan for the Arc should guarantee this.
- b) Focusing development on previously-developed land within urban areas, built at the highest density that is consistent with local character (where e.g. heritage assets apply) and healthy living.
- c) Major developments (new settlements and urban extensions) constructed at the upper end of ‘gentle density’ to ensure all new residential areas are 15-minute neighbourhoods where active modes of travel are possible and encouraged.
- d) The best quality farmland, natural and cultural sites and land with potential for biodiversity conservation or enhancement is robustly protected from harmful development without question.

Finally, there is a concern that some of the already limited available funding for conservation and enhancement of natural and cultural assets in the existing protected landscapes could be diverted to support mitigation of the impacts of growth and enhancement of currently undesignated assets in the Arc’s growth areas. In addition to providing a context for development and growth in the Arc region, the vision should recognise that the best value for money for strategic investment in the environment is likely to be achieved in areas that are protected from future development. Investment in conservation and enhancement in the growth areas themselves may best be provided through mechanisms linked to the development itself, such as net gain, section 106 and the community infrastructure levy.



**The Chilterns Area of Outstanding Natural Beauty**

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

**Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

**List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities; these are elected by:

- Hertfordshire and Oxfordshire County Councils
- Buckinghamshire, Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Dacorum Borough and North Hertfordshire, South Oxfordshire and Three Rivers District Councils
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- The Secretary of State for the Environment, Food and Rural Affairs (8 in total).