



CAMBRIDGE - MILTON KEYNES - OXFORD: A CORRIDOR OF UNCERTAINTY FOR THE COUNTRYSIDE

**A briefing by the Campaign to Protect Rural England (CPRE)
October 2018**

In recent years, London and the South East have seen rapid growth. The Government appears broadly content to allow this trend to continue. There has been little or no apparent attempt to pursue a national strategy to regenerate the Midlands and the North, with the 2010-15 Coalition Government's call for a 'Northern Powerhouse' appearing to have withered on the vine. But how can this approach be reconciled with policies to protect Green Belts, Areas of Outstanding Natural Beauty and nature conservation sites? The Government's answer has been to continue to look for areas where large-scale growth can happen close to London.

The most preferred area is the Cambridge - Milton Keynes - Oxford Arc (or 'corridor')¹. There has been talk of boosting development in this area for more than a decade, but the proposals have more recently been given the backing of the National Infrastructure Commission (NIC). In a report in October 2017 the NIC made a series of far-reaching recommendations². The Government is due to respond to these recommendations at the time of the Autumn Budget. If the recommendations are accepted they will have a force in planning policy and decisions that is roughly equivalent to the Government's National Planning Policy Framework (NPPF). An initial document³ published by the Treasury at the time of the 2017 Budget suggests that most, and possibly all, of the recommendations are likely to be accepted.

What are the issues for the countryside?

The NIC proposals recommend at least 1 million new houses in the Arc by 2050 and will encourage a population increase of over 1.9 million people.

The sheer scale of the proposals is demonstrated by the following statistics:

- **The distance between Oxford and Cambridge is around 85 miles.**
- **1 million homes are equivalent to 20 cities the size of Cambridge (53,000 homes)**
- **The entire county of Oxfordshire has 285,000 homes**

NIC recommendations also include 1.1 million new jobs, the re-opening of a railway link (known as 'East West Rail') between Cambridge and Oxford, and a major new road called the 'Oxford-Cambridge Expressway'. In September 2018 Highways England announced its 'preferred corridor' for the Expressway to run broadly parallel to the route of East West Rail

¹In this briefing CPRE has assumed that the local authorities listed in the Appendix to this briefing are considered part of the Arc, based on economic analysis for the National Infrastructure Commission (NIC).

²NIC, *Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc*, November 2017.

³ HM Treasury, *Helping the Cambridge, Milton Keynes and Oxford corridor reach its potential*, 22 November 2017.

between Oxford and Milton Keynes⁴. The way that the Government has already approached the issue is highly concerning, for three key reasons.

Democratic deficit

So far, there has been no formal public consultation on the NIC recommendations, and Highways England has only engaged with the public in a limited and inconsistent way on the Expressway. Nor is there any clear single point of accountability in Government for the proposals. This is despite their involving at least £5.5 billion of public money⁵. However, in July the Housing Minister wrote⁶ to local authorities in the Arc stating that the Government ‘welcomes’ the ‘ambition’ of the NIC proposals and calling on the authorities to bring forward ambitious proposals for new settlements. The Treasury document states that statutory plans will be used to plan the development of the Arc in detail. But CPRE is concerned that decisions on levels and locations of growth will effectively be made before there is a meaningful consideration of full effects on communities, agriculture and the environment. **The lack of consultation and debate adds up to a major, and troubling, democratic deficit at the heart of the proposals.**

Little assessment of environmental impact

There has been no formal Strategic Environmental Assessment (SEA) of the impact of the proposals for development in the Arc. The Arc is adjacent to the Chilterns, one of the most water-stressed districts⁷ of England, encompassing multiple areas of Green Belt. More widely, the countryside of the Arc is likely to become a more precious resource as current agricultural land in southern Europe becomes more difficult to farm as a result of climate change.

The Expressway will have a number of damaging environmental impacts. CPRE has shown that the building of new roads damages large areas of landscape in their own right, and increases overall levels of traffic in the areas in which they are built⁸. As currently proposed, the road appears to be a motorway by stealth, with a series of grade-separated junctions. Highways England has stated that roads designated as ‘expressways’ should be capable of being upgraded to motorway status in future⁹.

The increase in traffic associated with the new road, and the development planned in its wake, is in turn likely to increase air pollution if the new housing estates are geared around road access. There are significant problems with air pollution associated with road transport, particularly nitrogen dioxide (NO₂) and particulate (PM₁₀ & PM_{2.5}) levels. At least 527 locations have been used in local monitoring of NO₂ across the Arc¹⁰, and in three years since 2012 there have been around a fifth, or more than 100, of these monitoring stations that have reported NO₂ levels above Government objective limits of 40 microgrammes per cubic metre. This may be explained as part of a wider national trend of increased road

⁴<https://www.gov.uk/government/news/corridor-announced-to-unlock-full-potential-of-englands-economic-heartland> accessed 18 October 2018

⁵The £5.5 billion consists of the widely reported current cost of £3.5bn for the Oxford-Cambridge Expressway; £1 billion for East West Rail; and £915 million to support housing growth in Cambridgeshire and Oxfordshire through various devolution and housing deals.

⁶ Letter dated 26 July 2018 from Kit Malthouse MP to all local authorities in the Oxford-Cambridge Arc, accessed from <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/delivering-infrastructure/oxford-cambridge> on 18 October 2018.

⁷ Environment Agency & Natural Resources Wales, *Water stressed areas - final classification*, July 2013.

⁸CPRE, *The end of the road? Challenging the road-building consensus*, report March 2017.

⁹ Highways England, *Strategic Road Network Initial Report*, December 2017.

¹⁰ With the exception of East Cambs and Wellingborough district councils who have not reported monitoring in any year since 2012.

traffic over this period observed by the Government's Committee on Climate Change¹¹. Based on these reports, there are particularly concerning levels of air pollution in and around both Bedford and Northampton, but problems are by no means confined to these two towns. Oxford City Centre also has high levels of air pollution and the city and county councils have designated both a low emission and (from 2020) a zero emission zone to address this. Also, in March 2018 the Government directed Oxford City Council to take further action to address NO₂ levels on the Headington Road in the east of the city¹². The Expressway and an exponential increase in housing growth is likely to induce further traffic to enter Oxford from the east. So there is a major concern that the proposed growth could set back efforts to improve air quality both in the city and the surrounding countryside.

The NIC aspiration for 1 million new houses would involve a 330% increase over the combined amount of housing development (about 230,000 houses) currently proposed or being built in the Arc area¹³. The NIC states that the growth should take place in new and expanded settlements, with 'greater levels of development' to be required across all the towns and cities in the Arc¹⁴. This major increase in housebuilding is likely to lead to the loss of significant areas of greenfield land. Current brownfield registers in the local authorities for the Arc suggest that there is capacity for just under 50,000 houses on 3,130 ha of brownfield land. Therefore, the remaining c.720,000 would need to go on greenfield land. The current average density of housing development in local authorities within the Arc is 28 dwellings per hectare¹⁵. **If development continues at this rate of land use, this would involve building on over 25,700 ha of greenfield farmland and woodland - equivalent to building four cities with the urban land area of Milton Keynes between Oxford and Cambridge.**

The local Wildlife Trust has already highlighted that up to 345 wildlife sites, including 51 Sites of Special Scientific Interest and 20 reserves, could be affected by one of the possible Expressway routes, along with nationally important wildlife habitat. Cambridge and Oxford are well known historic cities with a substantial number of conservation areas and listed buildings. But there is also a wealth of history in the land between the two. Historic England has also shown that historic assets in the Arc range from 205 scheduled monuments (only 15 of these being within the cities of Oxford and Cambridge combined); 144 conservation areas (29 in Oxford and Cambridge), 7,321 listed buildings (1,990 in Oxford and Cambridge); 48 historic parks and gardens and the Blenheim Palace World Heritage Site.¹⁶

There is thus a need to plan on a landscape scale. A good contribution towards such work has already been made in a report for the Local Nature Partnerships within the Corridor¹⁷. However, CPRE believes that further measures will also be needed to guarantee a sense of place and minimize harm to the countryside character of the Arc area.

The National Character Area profiles¹⁸ produced by Natural England give further insight into the issues and opportunities that CPRE believes should be addressed in the future

¹¹ Committee on Climate Change, *Reducing UK emissions - 2018 Progress Report to Parliament*, June 2018, p.151.

¹² UK Air Quality website, <https://uk-air.defra.gov.uk/library/no2ten/2018-la-tfs-documents>.

¹³ NIC 2017, p.27.

¹⁴ NIC 2017, p.12.

¹⁵ Brownfield register figures come from CPRE analysis of the first tranche of registers published in winter 2017-18 by Arc local authorities (listed in the Appendix). Density figures are taken from Land Use Change Statistics live residential address change table 331.

¹⁶ <https://content.historicengland.org.uk/content/docs/consultations/response-to-nic-growth-corridor-aug16.pdf>

¹⁷ Rhodes J, *Natural Capital Planning for the Oxford-Milton Keynes-Cambridge Growth Corridor: Final Report*, August 2018. Downloaded from <http://bedfordshirenaturally.com/wp-content/uploads/2018/06/Growth-Corridor-Natural-Capital-Report-August-2018.pdf>

¹⁸ All NCA profiles are available from <http://publications.naturalengland.org.uk/category/587130>

management of land in each area. Development is likely (based on the preferred Expressway corridor) to affect four Character Areas in particular: the Bedfordshire and Cambridgeshire Claylands and Vales, the Bedfordshire Greensand Ridge, the Midvale Ridge and the Upper Thames Clay Vales. Recurring themes for future management in these areas include:

- Managing farmed landscapes to retain the value of food provision.
- A network of restored, extended and connected wildlife habitats.
- Safeguarding and improving areas of tranquility that are relatively free of disturbance from light and noise pollution, particularly in the Bedfordshire Greensand Ridge and the Beds and Cambs Claylands and Vales.
- Protecting long, open views from higher ground; traditional orchards and ridge and furrow landscape.
- New development should contribute to a sense of place, in particular recognizing historic settlement patterns and the network of hedgerows.

Much can be done to encourage greater awareness of the distinctive history and culture of the Arc area, and make it more attractive to visitors as well as new residents. We also need to avoid the unnecessary loss of farmland. This is a resource which is likely to become increasingly important in future, given that in recent years the UK has had to import an increasing proportion of food¹⁹. But there is no meaningful commitment from the Government either to maintain the Arc's existing environmental assets or improve them while the proposed growth programme is built out.

Lack of vision for housing

CPRE believes that the scale of housing and population growth proposed by the NIC for the Cambridge-Milton Keynes-Oxford Arc is too great in terms of what the Arc area should be expected to sustain. Wildlife Trusts across the Arc have also voiced their concerns over the sheer scale of the proposals.

Without intervention, it is likely that most of the new housing built within the Arc will simply be business-as-usual, land-hungry, expensive houses, rather than the diverse mix of housing we need to meet the needs of local people. There is a significant need for social and other low cost housing for people on average incomes or below within the Arc area. This is particularly because Cambridge and Oxford are two of the most expensive cities in England in which to buy a new home. But again, to date there has been no meaningful commitment to build a wider mix of new housing.

Current trends in new housing development are worrying. The NIC shows that rates of housing development in the Arc area already exceed the national average²⁰. However, most of this housing would appear to be serving affluent commuters and retirees rather than people earning average local wages or below. Those local authorities in the Arc that have set out clear policies for affordable housing delivery, have identified a cumulative need for over 11,800 affordable homes per year²¹. But on average just under 2,200 affordable homes per year (using the Government's widely contested current definition²²), or 22% of the

¹⁹ <https://www.theguardian.com/environment/2016/jan/06/more-than-half-of-uks-food-sourced-from-abroad-study-finds>

²⁰NIC 2017, p.24.

²¹Based on the current local planning policies of all local authorities listed in the Appendix, with the exceptions of Daventry, Northampton, South Northamptonshire, South Oxfordshire, and Wellingborough. CPRE was unable to find the relevant information for these authorities.

²²The Government's definition of affordable housing is set out in the National Planning Policy Framework, published in its most recent form in July 2018.

overall total houses built in these areas, have been provided²³. Similarly, if this trend continues in the development of the Arc then **only 18% (or less than a fifth) of the locally identified need for affordable homes will be met** during the planned period of growth.

Any necessary new housing development should be well-designed to fit in with the wider landscape (see above), be well-served by transport options other than the car, and built to high standards of energy efficiency. The recognized industry standard, Building for Life 12, can be used to address these points. Encouragingly, the Government agency Homes England is likely to play an important role in at least some development in the Arc. This may help improve the quality of new schemes. There have also been some recent examples of good practice in new developments in Bicester and Cambridge.

But the Arc strategy, if taken forward, is likely to result in a massive increase over and above the levels of housing growth already proposed in Local Plans based on local authority assessments of housing need. Again, there is no Government commitment to work towards high standards of design or to prioritize meeting local housing needs as distinct from wider market demand.

What CPRE wants to see

The worrying lack of scrutiny and risk to our countryside means we are calling for:

- **A full parliamentary inquiry into the proposals.** The Arc proposals will involve significant amounts of public money - at least £5.5bn and likely to be much more. CPRE supports the development of East-West Rail. We believe it is needed primarily as a means of relieving congestion on the highways network and reducing air pollution, rather than a means of opening up the countryside to a massive new housing conurbation. Beyond this, at a time when much of the Midlands and northern England feel left behind and in need of regeneration, there needs to be a public and parliamentary debate about whether this level of growth can be justified in an area already attractive to employers and the housing market. CPRE believes that there is a need for a national strategy that does more to encourage regeneration across all regions in England.
- **A proper planning process with local involvement.** This means at least one round of full public consultation as well as a public examination, with local people given the opportunity to express views on both the broad development options and the individual sites that are earmarked for development, including the environmental implications.
- **An Arc-wide commitment to high standards of affordable housing provision and design.** The Government should make it clear that high levels of affordable housing - as much as 50% - should be achieved in new developments. Local needs for social rented or other low cost housing must be prioritized over servicing market demand for larger, more expensive houses. As a minimum, developments should meet all of the criteria under the industry's Building for Life 12 Standard for the design of new schemes.
- **Protection and improvement of the environment.** The undeveloped countryside of the Arc is not, as some officials and developers may see it, a blank sheet of paper on which they can put whatever they choose. This countryside is hugely important for both wildlife and cultural history, and contains large tracts of productive farmland. There needs to be a vision and strategy for environmental improvement in the Arc that has at least the same weight as the policies allocating housing sites. The Local Nature Partnerships within the Corridor have made a valuable initial contribution to this debate. CPRE believes that it is essential that environmental improvement work is not only focused on natural capital, but goes further in understanding the Arc's extensive historic

²³Affordable housing completions for local authorities are taken from MHCLG Housing Statistics live tables 122 and 1008C. Note that the calculation does not include data for those local authorities for whom CPRE could not find information about affordable housing policy requirements.

environment assets, and seeks to define and safeguard tranquil countryside areas where people can find relief from pollution and stress.

- **Improvements to public transport, not a new road.** We welcome the Government's commitment to East-West Rail, and progress is being made in restoring the link between Oxford, Milton Keynes and Bedford. Further work to re-open this line between Cambridge and Bedford will be a major undertaking and this will be hindered or slowed by major spending on new roads in parallel. The Expressway is predicted to cost at least £3.5 billion; and it will add to air, light and noise pollution and countryside loss, and encourage additional traffic both to and from places outside the Arc. At a time when we desperately need investment in sustainable travel options, it makes no sense to lock in pollution and car-dependency for decades to come. The recommendations of the most recent report of the Committee for Climate Change should be followed in planning all new development in the Arc. In particular, as the Committee recommends²⁴, the need for motorized travel should be reduced so that pollution is minimized and people can travel in ways that also benefit a healthy lifestyle. Completing East-West Rail should be the priority, not a new road.

What local people can do

We urge local communities in the Arc area to make their voice heard on the proposals. CPRE will analyze the Government's response to the National Infrastructure Commission and provide further information on our website over the coming weeks. In the meantime, we would encourage local people and community groups who share our concerns and suggested way forward to contact their local MP and councillors. The Arc proposals urgently need a full, wide-ranging public consultation, including further debate both in Parliament and at the local level.

CPRE
October 2018

²⁴ Committee on Climate Change, June 2018, p.146.

APPENDIX: LIST OF LOCAL AUTHORITIES IN THE CAMBRIDGE-MILTON KEYNES-OXFORD ARC

Aylesbury Vale
Bedford UA
Cambridge
Central Bedfordshire UA
Cherwell
Daventry
East Cambridgeshire
Huntingdonshire
Luton UA
Milton Keynes UA
Northampton
Oxford
South Cambridgeshire
South Northamptonshire
South Oxfordshire
Vale of White Horse
Wellingborough