



**Submission by the Oxford City District Committee of the Oxfordshire  
Branch of the Campaign to Protect Rural England (CPRE)**

**In response to**

**Green Spaces Strategy 2012-2026 consultation**

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Submitted by:  
Dr Sarah Milliken  
Vice Chair, Oxford City District Committee

sarah.milliken@arch.ox.ac.uk

## Introduction

The Oxford City Committee of the CPRE welcomes the opportunity to comment on the draft Green Spaces Strategy 2012-2026.

We hope that this strategy reflects a real intention on behalf of the City Council to protect and improve the provision of accessible open space in the city, rather than simply a statutory obligation to produce such a document. Our doubts in this regard stem from the fact that its predecessor, the Green Spaces Strategy 2006-2011, included a number of prioritised actions regarding green space quantity and accessibility which the City Council has completely failed to deliver, in spite of a number of opportunities. These were to:

1. Maintain provision of green space at a minimum of 5.75 ha/1000 population
2. Increase the provision of open spaces in areas highlighted by the open space assessment as having inadequate provision, e.g. Littlemore, Headington
3. Develop a countryside access strategy (to improve access to farmland and the Green Belt)
4. Establish and maintain a range of activity or interest led partnerships to increase access to green spaces
5. Increase the number and quality of small local spaces
6. Increase the provision of play areas for teenagers
7. Reduce fragmentation and isolation of habitats by creating linkages between sites

Our response to this consultation is in two parts: comments on how the draft Green Spaces Strategy document deviates from best practice guidance; and comments on the aims and objectives set out in the draft Green Spaces Strategy.

## Comments on how the draft Green Spaces Strategy document deviates from best practice guidance

The executive summary states that the strategy has been produced using best practice guidance, but a reading of the document itself suggests that this is very far from being the case.

*Space Strategies: Best Practice Guidance* (CABE 2009) sets out a clear six-stage process for the preparation of Green Space Strategy documents:

|         |                                      |
|---------|--------------------------------------|
| Stage 1 | Prepare the scoping study and brief  |
| Stage 2 | Review the context                   |
| Stage 3 | Understand the supply                |
| Stage 4 | Understand demand and need           |
| Stage 5 | Analyse and identify objectives      |
| Stage 6 | Prepare the strategy and action plan |

Of the twenty-six pages of text of the draft Green Spaces Strategy document, all but three deal with stages 5 and 6; consequently there is no evidence that the first four stages of this process have been adequately addressed, if they were addressed at all.

In terms of understanding supply, the last **audit of green spaces** was carried out in 2005<sup>1</sup>. Since then the population of Oxford has grown by 19,000 and the quality of many of the city's green spaces has deteriorated. A green space strategy needs to be based on up-to-date information about the nature and quality of each open space and should cover issues known to concern users, such as vandalism, dog fouling, lack of security and noise.

Just as the quality of open space can change over time, so can demand and need. Changing demand and need are best assessed by means of attitude and use surveys, and we are therefore concerned by what seems to us a grave lack of **public engagement** in the preparation of the draft strategy document. While it is true that for the last three years the City Council has run on-line consultations on parks and open spaces, these have been very limited in terms of the questions asked, and do not include data on demographic profiles. People experience public open space very differently depending on their social, cultural and economic background, and as a result the survey results provide little insight into actual need and demand. The low number of respondents in each survey<sup>2</sup> — less

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<sup>1</sup> Oxford City Green Space Study (Scott Wilson 2005)

<sup>2</sup> 283 respondents (November 2009 – March 2010); 31 respondents (April – December 2010); 55 respondents (January – December 2011)

than 0.2% of the population — demonstrates that this is not an effective way of engaging the public.

The community's needs and aspirations must be at the heart of any open space strategy and it is therefore absolutely essential to engage with local people at each stage to identify and deliver the real priorities. Best practice guidance recommends consultation with focus groups and key stakeholder groups, such as allotment holders or sports associations, in order to explore their needs in greater depth, and to probe the concerns of hard-to-reach groups. This seems not to have been done.

The preparation of the Green Spaces Strategy also represents a lost opportunity to carry out a detailed **access audit** on the open space sites themselves to ensure that disabled people have easy and equal access in line with the Equality Act 2010.

We are particularly surprised, and indeed alarmed, that the draft Green Spaces Strategy document is entirely **non-spatial**: there are no maps identifying target areas for green space provision or improvement. This blatantly contravenes best practice guidance, which states that a draft strategy should contain a spatial plan or series of plans outlining the spatial strategy. Furthermore, the spatial elements of a green space strategy should feed into the local development framework (LDF), and the draft strategy should therefore include a statement about the intended status of the strategy within the LDF, for example as an SPD: it does not.

Best practice guidance states that an open space strategy is not simply a planning document; it should also set aspirations for greater investment or a reallocation of **resources** to meet new priorities. The strategy should make clear the implications for resourcing and identify potential sources of funding, and the action plan should include estimated costs (capital and revenue). All of these are absent from the draft Green Spaces Strategy document.

Finally, we would like to see details about how the Green Spaces Strategy will be **monitored and reviewed**. Best practice guidance states that the monitoring and review procedures specified in a strategy should usually include details of key performance indicators, who will be responsible for monitoring which indicators, and how frequently the strategy and the action plan will be reviewed. This information is absent from the draft Green Spaces Strategy document.

We are particularly concerned about this in light of the fact that a freedom of information request submitted to the City Council on 9

December 2011, asking to see all the annual monitoring reports for the Green Spaces Strategy 2006-2011, returned only a Green Spaces Strategy Review Summary document dated June 2007. We therefore have to conclude that either monitoring of the Green Spaces Strategy 2006-2011 did not take place after its first year, or that the City Council failed to respond with all the relevant documents, which would be in contravention of the Freedom of Information Act 2000.

Sadly, one can only conclude that the draft Green Spaces Strategy document does not result from a rigorous process of analysis but rather has been rapidly assembled without much thought or care. As such it offers no guarantees that accessible green spaces will actually be created, protected or enhanced. We would urge the City Council to undertake a more thorough assessment of current supply and demand for green space in the city and to redraft the Green Spaces Strategy in line with best practice guidance, which is clearly set out and readily available.

## **Comments on the aims and objectives set out in the draft Green Spaces Strategy document**

**Aim 1      To establish a minimum standard of green space provision to ensure that Oxford has an agreed amount of green and play spaces to meet existing and future needs of residents, workers and visitors**

The draft Green Spaces Strategy document reiterates the City Council's accessible green space standard which is set at 5.75 hectares per 1000 population.

It is unclear, however, how this standard is going to be achieved. Currently the provision is only 5 hectares/1000. By 2026 population increase will reduce this to 4.8 hectares per 1000 population, and an additional 144 hectares of green space will accordingly be needed in order to meet the city green space standard<sup>3</sup>.

This deficit will clearly be exacerbated by the City Council's intention, set out in the Sites and Housing DPD, to develop a number of existing green spaces, despite local sentiment expressed in the two rounds of consultation that they should be retained because they provide much needed recreation space, sports facilities, food-growing areas or access to nature.

It is therefore highly misleading (to put it mildly) of the City Council to continue to maintain that this accessible green space standard can ever be achieved. We would urge the City Council to set a more realistic green space standard and to draw up detailed policies which demonstrate how it will be maintained.

Furthermore, the draft Green Spaces Strategy document states that the standard (of 5.75 hectares per 1000 population)

will be used to identify parts of the City that are currently deficient in accessible green space. Therefore it will inform proposals to improve green space in different parts of the City (p.8)

However, the accessible green space standard and an analysis of areas of surplus and deficit in the city were first published seven years ago<sup>4</sup>, since when there has been no increase in the provision of green space in the areas which were then highlighted as being chronically deficient, such as Littlemore and Blackbird Leys. On the

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<sup>3</sup> 144 hectares is more than three-quarters the size of Port Meadow (178 hectares)

<sup>4</sup> Oxford City Green Space Study (Scott Wilson 2005)

contrary, opportunities to redress the balance in the south of the city continue to be ignored, as demonstrated yet again by the City Council's intention to develop the disused allotments at East Minchery Farm.

This intention is somewhat surprising given the recommendation in the national guidance document for allotments<sup>5</sup> that, wherever possible, land that has previously been used for allotments or other forms of cultivation should be kept in a condition where it can be returned to that use at a future date.

Furthermore, Policy SR8 Protection of Allotments, which is a 'saved policy' from the Oxford Local Plan 2001-2016, states that

where allotments are no longer in active cultivation, development will only be permitted where ... there is no need for the allotments to be used for other outdoor recreational purposes

The Green Spaces Strategy sets out an allotment standard of at least 1 plot per 125 head of population. Clarification is needed as to what is meant by 'plot': is this the conventional 250 square metre '10 pole' or '10 rod' plot, or a half plot? A policy of offering only half plots to new tenants has been widely and successfully adopted by many local authorities in the UK as a way of halving the waiting lists for their allotments. However, this strategy should not be used as a means of reducing the overall area required for the provision of allotments, as smaller plots are likely to release latent demand that was previously suppressed by the inability of many people to cope with a full plot. For this reason, national guidance recommends that a standard set in 'hectares per household' is to be preferred as a more stable basis for planning.

The recent escalation in the demand for allotments demonstrates that 'need' is not static, and thus not easily captured by a fixed standard. It is good practice to build into both policy and practice sufficient flexibility to enable land to be redistributed between different green spaces uses, to accommodate changing demands, and with co-location a key tactic. This would help to ensure that standards can not only be modified, but also met.

National guidance on allotments also strongly advocates that local authorities prepare allotment strategies, which should not only guide the development of the allotments service, but also form part of the broader strategic policy for green spaces. We would therefore urge the City Council to include the preparation of such a strategy as one of their action points in the Green Spaces Strategy.

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<sup>5</sup> A Place to Grow (Local Government Association 2010)

## **Aim 2      To ensure everyone living, working and visiting in Oxford has easy access to open space**

The draft Green Spaces Strategy document sets out the local distance standard for green space in the city:

To ensure that people do not have to walk more than 1900m to their nearest Large Park, not more than 750m to their nearest Medium Park and not more than 400 m to their nearest Small Park. This standard will be applied to all new developments as well as existing residential areas (p.10)

It is unclear how this standard is going to be applied to existing residential areas. Appendix 4 of the draft Green Spaces Strategy document shows all too clearly that many residential areas in the city fall substantially outside the 1900 metre radius of the eight Large Parks. Either the people living in these areas will have to be moved closer to the Large Parks, or new Large Parks will have to be created in them. Naturally we would welcome the second option but, once again, we would like the Green Spaces Strategy to set out more detail about how this objective will actually be achieved.

Quite apart from that, we are concerned that the local distance standard does not conform to best practice guidance. We would urge the City Council to adopt Natural England's Accessible Natural Greenspace Standard (ANGSt)<sup>6</sup>, which recommends that everyone should have access to a quality natural green space of:

- at least 2 hectares within 300 metres (5 minutes walk) from their home
- at least 20 hectares within two kilometres
- at least 100 hectares within five kilometres
- at least 500 hectares within ten kilometres
- one hectare of statutory Local Nature Reserves per 1000 population

The distance thresholds used in ANGSt are not arbitrary: they are based on what studies have revealed about people's actual behaviour. For example, it is known that the majority of parents are unwilling to allow their children to be unaccompanied more than 300 metres from home. Although local circumstances may lead to variations on this distance, adopting this as a standard would ensure that the majority of children do indeed have a green space near their home, which they are able to use freely.

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<sup>6</sup> 'Nature Nearby': Accessible Natural Greenspace Guidance (Natural England 2010)

ANGSt is complemented by the woodland access standard (WASt)<sup>7</sup>, which recommends that everyone should have access to woodland of:

- at least 2 hectares within 500 metres of their home
- at least 20 hectares within four kilometres

The most recent survey data show that less than 0.05 percent of the population in Oxford conforms to the first of these two thresholds<sup>8</sup>. The Green Spaces Strategy represents an opportunity for the City Council to set out its intentions with regard to planning new accessible green spaces in the city and defining what they should look like. We would like to see a clear statement of how the City Council intends to increase the amount of accessible woodland in the city.

In terms of the fringes of the City, the Green Spaces Strategy needs to include specific plans for the development a countryside access strategy in order to improve access to farmland and the Green Belt by foot, cycle and horse.

Policy SR10 Creation of Footpaths and Bridleways, which is a 'saved policy' from the Oxford Local Plan 2001-2016, contains a number of proposals to create new footpath links in order to develop a 'green network' giving access to and across the different areas of open space in Oxford, with links to local shops, community facilities and schools. The policy also incorporates a mechanism for creating such a network, specifying that where appropriate, contributions towards the creation of these routes will be secured through a planning obligation. We would like to see details of such proposals reiterated in the Green Spaces Strategy.

**Aim 3            To achieve high quality green spaces across Oxford, including spaces that are nationally recognised for their quality and attractions**

The Green Spaces Strategy sets out the vision statement for Oxford's green spaces:

to provide world class parks and open spaces to enhance the quality of life of everyone living, visiting or working in Oxford (p.6)

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<sup>7</sup> Space for People: Targeting Action for Woodland Access (The Woodland Trust 2004)

<sup>8</sup> ibid

It is therefore somewhat contradictory that the stated quality objective is to increase the standard of medium and small green spaces to achieve an average quality inspection score of 'Sufficient' or 'Good', rather than 'Excellent or World Class'. We would encourage the City Council to set more exacting standards so that they may fulfil their vision.

People use green spaces in different ways, seek different experiences from them and look for different facilities and features. All of these factors affect whether individuals feel that they are visiting a good quality green space. It follows therefore that quality standards and policies can only be formulated after extensive public consultation has taken place, which has certainly not happened yet.

Although it is of limited utility, the City Council's online parks and open spaces consultation has consistently shown that the three main issues to cause concern to respondents are

- poor lighting
- poor toilet facilities
- poor security

However, there is absolutely no indication in the draft Green Spaces Strategy document that these issues will be addressed.

Given the regrettable absence of effective consultation thus far, we feel that the City Council could learn much by looking at the work carried out by Bristol City Council, where a significant level of customer research took place to inform both the development of green space quality standards and the Council's service management policies<sup>9</sup>. Over 5500 people contributed their ideas through surveys, on-line discussion forums, and focus groups. This research revealed that a high quality experience is broadly dependent on the following factors:

- There being a comprehensive maintenance regime
- The immediate repair or replacement of run down, damaged and vandalised facilities
- There being a variety of facilities
- Green spaces being and feeling safe to use
- There being no dog mess in parks and the issue of dogs exercised off a lead being addressed
- The provision of a variety of types of spaces e.g. play space or wildlife space, that may be used in different ways

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<sup>9</sup> Bristol's Parks and Green Space Strategy (Bristol City Council 2008)

- The provision of multifunctional parks that may provide a broad range of experiences in one place
- The provision of accurate and up-to-date information on green spaces in a range of formats

The quality standard and the policies laid out in Oxford's Green Spaces Strategy should be rewritten so that these aspirations are addressed.

**Aim 4      To promote the central role that green spaces play in contributing to the City's biodiversity, sustainability and heritage**

Objective 15 of the Green Spaces Strategy, 'Adapting to Climate Change', is

To proactively adopt and promote practices that recognise the key role that Oxford Parks and Open Spaces can play in the City's adaptation to climate change (p.16)

The action plan for achieving this objective consists of using water retaining pellets to reduce the amount of watering required, reducing the use of bedding plants, broadening tree species selection to cope with climate change and planting 100 new trees each year.

However admirable these measures may be, we do not believe that they go nearly far enough. Climate change will impact on Oxford's green spaces in two key ways: first, there is a growing need to reduce the release of greenhouse gases caused by activities relating to the use and maintenance of all types of green space (mitigation); and second, the fact that the climate of Oxford will inevitably change will make it difficult for existing species and wildlife to survive unless they can adapt to their changing environment (adaptation).

The draft Green Spaces Strategy document fails to give adequate consideration to climate change mitigation. There are a number of actions which we believe the City Council should include:

- Use of sustainable materials – recycled, local, low energy and low waste
- Review management practices to reduce use of powered mowing and maintenance equipment wherever possible
- Review management practices to reduce fleet fuel use

As far as adaptation is concerned, we would like to see the following actions included in the Green Spaces Strategy:

- Ensure water conservation through use of grey water and rain water harvesting
- All landscaping schemes to incorporate sustainable drainage to help tackle flooding
- Increase levels of casual amenity space through innovative street design, in particular tree planting and small space provision
- Include managed 'wild' areas to encourage biodiversity
- Focus on planting for wildlife
- Encourage the provision of linked corridors of green space to enable species to migrate
- Habitat creation to strengthen resilience of species under threat (as advised by wildlife authorities)
- Increase provision of natural and semi-natural green spaces through planting proposals for all new developments

These actions would go some way to improving Objective 16, 'Protect and Enhance Biodiversity', which is currently very vague and is largely concerned with the impact of maintenance regimes on wildlife, rather than the creation and improvement of natural green spaces. We would like to see reference to specific sites and more details about

- How the strategy relates to the objectives and targets set out in the County Biodiversity Action Plan
- Proposals to create new habitats
- Proposals to link existing habitats in order to counter landscape fragmentation
- How existing wildlife corridors will be protected and enhanced and how they will be used as a focus for further improvements
- How existing habitats and species will be protected and buffered
- A timetable for creating management plans for all Local Wildlife Sites in the city

We would urge the City Council to reconsider the proposed timescale (2020) for creating a management plan for Port Meadow. As a Special Area of Conservation (SAC) this is a strictly protected site designated under the EC Habitats Directive, and it is therefore imperative that adequate safeguards are put in place as soon as possible.

Finally, the Green Spaces Strategy needs to acknowledge the importance of green spaces to the heritage of the city and, consequently, to tourism. An essential part of the city's character stems from the relationship between its buildings and its open spaces, and the important role of trees and landscape features. The parks and gardens in both the city centre and its suburbs make Oxford an unusually green city, offset its architectural treasures, and contribute to its picturesque landscape suburbs. We urge the City Council to include the production of management plans for all parks and open spaces of known historic importance as one of its action points.

**Aim 5            To promote the central role that green spaces play in contributing to the City's health and well-being**

Objective 18 of the Green Spaces Strategy, 'Promoting Links between Green Spaces', is

To work with transport planners to identify opportunities to increase the number of safe walking and cycling routes (p.18)

While existing and new access routes should wherever possible be made to double as biodiversity corridors, the Green Spaces Strategy needs to acknowledge that the demands of access from existing and expanding populations will need to be carefully managed by use of suitable controls and agreements in order to protect sensitive environments.

**Aim 6            To support community cohesion and community involvement in the stewardship of green spaces**

Objective 21 of the Green Spaces Strategy, 'Community Involvement', is

To support new and existing community involvement in the design, management and enhancement of Parks and Open Spaces (p.21)

We welcome the intention of the City Council to involve the local community in decision making around major improvement projects and in the design of new green spaces. However, we would like the Green Spaces Strategy document to include more specific detail about how it is proposed that this should be done. In particular, we would urge the Council to consider adopting a 'design charette' approach, where members of the public and design professionals

are brought together in a series of public workshops in order to capture the vision, values, and ideas of the community.