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working locally and nationally to protect
and enhance a beautiful, thriving
countryside for everyone to value and
enjoy

CPRE Oxfordshire comments on the draft Green Infrastructure Strategy for Vale of White Horse and South Oxfordshire

CPRE strongly welcomes this report. We particularly welcome its place within a systematic planning framework, the strong commitment to preserving, and enhancing biodiversity and the strong commitment to improving access to the countryside. We also welcome the commitment to protecting AONBs and a commitment to the Green Belt (although with the latter we feel the opportunities the Green Belt provides for recreation and ready access to the countryside for the urban population could be recognised and explored further). We also welcome the strategy and delivery sections (3 and 4) – with a steering group, manager and forum envisaged. Such a plan only works if there is a structure to develop and monitor progress we hope funding will be put in place to ensure this happens.

One estimate suggests that environmental deficits, including leading to obesity, death and ill health through air pollution, mental health problems linked to traffic, noise and congestion, cost Oxfordshire in excess of two billion pounds per year (see for example: <http://www.cpreoxon.org.uk/events/past-events/item/2573-positive-planning-seminar>). Thus even a small reduction of these costs through enhanced Green Infrastructure would be vastly beneficial and cost effective.

This plan assumes the huge, unsustainable and unrealistic growth in employment, housing and hard infrastructure as envisaged in the Oxfordshire Strategic Economic Plan and Housing Assessment. Such grow levels are generally regarded as ‘aspirational’ and as such my not be achieved. In particular the political and economic climate following the BREXIT vote makes the achievement of these targets much less certain. Any strategic plan for Oxfordshire should recognise and plan these uncertainties. In addition it must be recognised that the scale of hard development across the Vale and South Oxfordshire will inevitably damage our natural environment. The plan needs to recognise this damage and put hard proposals in to ameliorate its impact. This report is a good first step to this process but needs to be ambitious and needs a strong and continuing commitment to the preservation of our Green Infrastructure.

On the negative side the report seems to forget about the importance of the rural economy and farmers. Clearly farmers (and land owners) need support and encouragement to improve biodiversity of and access to the countryside. We should also not forget importance of local food and

the potential to link rural and urban populations through farmers markets, open farms etc, etc. The changing economic and political outlook following the BREXIT vote in fact provides an important opportunity to strengthen the rural economy and enhance the countryside through the constructive reform of the EU farm subsidy scheme (see for example:

<http://www.cpreoxon.org.uk/news/item/2567-new-cpre-report-published-new-model-farming-%20resilience-through-diversity?highlight=WyJicmV4aXQiLClnYnJleGI0liwiZmFybWluZyJd>). The

Councils should be engaged with these discussions to ensure resources are directed positively to the countryside in districts.

CPRE have sponsored a number of very successful networks of footpaths in Oxfordshire, notably the d'Arcy Dalton Way (<http://www.cpreoxon.org.uk/resources/item/2571-d-arcy-dalton-way-guide?highlight=WyJmb290cGF0aHMiXQ==>) and the Green Belt Way

(<http://www.cpreoxon.org.uk/campaigns/oxford-green-belt/walk-the-green-belt-way>). We will be very happy to work with the Councils and the proposed Forum to enhance these networks and develop new ones.

Finally we are concerned about the implementation and monitoring of these plans. This is vital if this is to be (as it should be) a blueprint for how development can take place in the Districts without destroying the environment and wellbeing of the population. Substantial resources need to be committed to make this work.

Detailed comments:

Executive Summary

1. Welcome that it is a framework for the delivery *and management* of Green Infrastructure within South and Vale (our italics) – executive summary and para 1.1.26.

1.0 SETTING THE SCENE

2. Pleased to see a wide definition of GI – to include both rural and urban settings (para 1.1.11).
3. Urban food growing is mentioned but not local rural food enterprises (para 1.1.16) – for Oxfordshire this seems important.
4. It is a great pity that the GI policy for Oxfordshire as whole has not been implemented to provide a context for this (para 1.1.19).
5. Surely stakeholders should include the farming community (para 1.1.24) and an important part of sustainable economic growth should be the encouragement of local food production and distribution (para 1.1.25).
6. This strategy should inform site allocations in the Districts' Local Plans not just respond (Para 1.1.31) – what is the mechanism?
7. Para 1.2.4 misrepresents the purpose of the Oxford Green Belt – it exists to prevent urban sprawl and provides a mechanism to ensure green spaces are close to urban centres. It should therefore be seen as an essential planning tool to protect green infrastructure.
8. Para 1.2.18. is already out of date – the Chinnor reservoir has been filtered out due to cost and the transfer is likely to come to Culham. It seems very likely that Thames water will recommend a reservoir at the Abingdon site (although CPRE and residents groups question this conclusion) but if it does go ahead footpaths and access in the area will be severely disrupted. If it does go ahead the Councils should ensure the opportunities it provides for green recreational activities and biodiversity enhancements should be fully exploited. We are likely to get a clearer picture of Thames Water's intentions in April/May 2017.

9. Para 1.2.25/26. Again the importance of the Oxford Green Belt should be recognised in its role as providing landscape context surrounding Oxford.
10. Para 1.2.29. Completely agree we need more stringent water efficiency measures (the Oxfordshire/Swindon region faces a considerable shortfall in water in the coming decades) and sustainable transport measures to mitigate the already serious air pollution situation in the Districts.
11. Para 1.2.34. This is ambiguous - what is the timescale of a 10% increase? It's worth pointing out that the SHMA population growth figures are two and a half greater than those of the ONS (para 1.2.40).
12. Para 1.2.38. The importance of rural industries should be emphasised here – not just food production (although important) but wood and food preparation and distribution.
13. Para 1.2.55. There needs to be a strong commitment to ensuring any mineral extraction enhances the biodiversity of the Districts and improves access to the countryside.
14. Para 1.2.58. There should be an opportunity to improve biodiversity and access, while also benefiting the rural economy, by working with farming community and land owners.
15. Para 1.4.12. This is the first acknowledgement of farmland! It is a great pity there is not a map of agricultural land (perhaps split into grades?).
16. 1.4.15 - 65% of South Oxfordshire is AONB or Oxford Green Belt. Does it make one wonder why such a constrained District is being allocated the largest share of Oxford's unmet housing need?
17. Para 1.4.33. Where is a discussion of the importance of the rural and farming economy?
18. Para 1.4.34. This is very out of date – the renewable industries (once thriving in Oxfordshire) are collapsing through Government indifference.

2.0 GREEN INFRASTRUCTURE ASSETS

19. 2.3.8 - 'Analysis of aerial photographs suggest that green roofs and rain gardens are uncommon and do not contribute significantly to the GI within the study area' Then no further mention! But of course they *could* contribute if they were encouraged!
20. Para 2.6.1. This understates the demand for allotments and ignores the development pressures on them. A better analysis of the extent, usage and demand for allotments would be helpful.

3.0 GREEN INFRASTRUCTURE STRATEGY

21. Para 3.3.1. It is very strange the document continues to aim for growth and job creation when there is no unemployment in the Districts and severe skill shortages!
22. Para 3.3.1. There is a major issue with the maintenance of pedestrian and cycle paths across the District. Maintenance is alluded to early in the document but not here – there must be a strategy for this.
23. Para 3.4.10. Developers should do more than 'fully consider' sustainable and multifunctional GI – they should be obliged.
24. Box 3.2 - Design checklist for development proposals - great. What teeth will they have?

4.0 DELIVERY FRAMEWORK

25. Para 4.3.1. We would question the 'incremental approach' to GI provision, particularly for larger developments – unless these are planned in at the beginning they will be impossible (or very expensive) to bring in later. Overall we are concerned about funding, to date OXLEP have been singularly unsuccessful in attracting funding for GI projects (for example the SEEIP

proposals). We recognise the funding restraints of the District (and County) Councils but suggest a concerted fund raising approach across the councils and major stakeholders to ensure this initiative succeeds.

26. Para 4.3.3. The steering group needs a wider representation – with the inclusion of local conservation and community groups – this process needs to be transparent and open to scrutiny. We welcome the stakeholder forum and CPRE requests a place!
27. Section 4.4. As we move to post Brexit farming subsidies the Districts should be making a bid to access these sources of money to improve biodiversity and sustainability of the countryside, improve rural economies and improve the links between the urban and rural settings.
28. Section 4.5 Green Infrastructure Management, we strongly support the appointment of a GI manager – this is really important and should not be forgotten!

CPRE Oxfordshire
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