Oxfordshire Environment Board

Oxfordshire Plan Team,

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07 October 2021

Oxfordshire 2050 Plan Reg 18 (2) Consultation, October 2021 – Response from the Oxfordshire Environment Board

The Oxfordshire Environment Board welcomes the Oxfordshire 2050 Plan's key themes of addressing climate change, improving environmental quality and creating strong and healthy communities. We agree entirely with your opening statement that:

> *"Oxfordshire is a unique and special place shaped by its beautiful and varied landscapes, rich cultural heritage and areas important to nature conservation."*

We have the following specific comments to make on the Regulation 18 (2) consultation document:

1. **Policy Option 07: Nature Recovery** – OxEB warmly welcomes the commitment to use the emerging Nature Recovery Network as a basis for guiding spatial strategy.

    In order for this to be effective, we believe that development within the Core and Recovery Zones should be constrained to development in line with the immediate delivery of nature recovery.

    All other development should be considered inappropriate except where exceptional/very special circumstances are shown to exist and all other options have been exhausted. In this instance, consideration should be given to setting a higher Biodiversity net gain target.

    We would like to see a specific commitment to supporting and giving priority to policies that emerge in the upcoming Nature Recovery Strategy.

    We also draw attention to the proposed policies for OP2050 prepared by the Biodiversity Advisory Group[1] and in particular the need to invest more in monitoring the change in nature so that it can be seen if the improvements are actually being achieved and action taken if not.

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[1] https://www.wildoxfordshire.org.uk/proposed-policies-for-op2050/

2. **Policy Option 08: Biodiversity Gain** – OxEB supports the need for the proposed 20% biodiversity net gain policy, although there is a case for suggesting it should be higher still within the Core/Recovery zones of the Nature Recovery Network (see above). This will require adequate investment, in local authority or independent expertise and resource, to provide robust assessment of developer proposals in the first instance and longer-term monitoring and enforcement, bearing in mind that delivery is due over a 30-year period.

   We note that the Defra Biodiversity Metric proposed in the policy has been subject to criticism[2] and seems likely to be consulted on still further next year.

   There will also need to be a balance between ensuring onsite delivery of biodiversity net gain (BNG) to help mitigate the direct impacts of development and offsite delivery to support Oxfordshire's Nature Recovery Strategy and Green Infrastructure Strategy in a co-ordinated and holistic manner.

3. **Policy Option 09: Natural Capital & Ecosystem Services**
   This Policy should include a clear commitment and timescale to create a fully-costed Green Infrastructure Plan. This is long overdue, as shown by the latest Oxfordshire Infrastructure Strategy Stage 1 Consultation Document, which identified a county-wide shortfall in the necessary green infrastructure projects and investment. When planned strategically, Green Infrastructure should deliver a network of natural and semi-natural areas, both urban and rural, which can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity.

   The Policy should therefore reflect the need for the Green Infrastructure Plan to focus not just on benefits to biodiversity (in part covered by Policies 07 Nature Recovery and 08 Biodiversity Gain) but also accessible green space, which currently is insufficient to meet accessible green space standards. Access to, along with, the means and ability to engage with green places, particularly natural green spaces and places, has been identified as being a key determinant of physical health and mental wellbeing. Lack of access to green and blue spaces has shown to have contributed to inequalities throughout the pandemic and continues to do so. Access and engagement with the environment leads to proactive environmental behaviours and actions.

4. **Housing density** – OxEB supports the introduction of a policy on housing density, to encourage compact, sustainable and climate-friendly neighbourhoods that make best use of scarce land resource. This must be supported by high quality design that builds in nature, including sufficient accessible green space.

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[2] https://www.theguardian.com/environment/2021/jul/21/biodiversity-metric-algorithm-natural-england-developers-blight-valuable-habitats-aoe

Oxfordshire Environment Board

5. **Large-scale nature areas** – in line with the Biodiversity Advisory Group (see above), OxEB supports the call for the establishment of one or more large nature areas of at least 5000ha in size in Oxfordshire. This is also in line with the Accessible Natural Green Space Standards where everyone needs access to a 500 ha site within 10 km of their home and a 100ha site within 5km.

6. **Policy Option 15: High-Quality Design for New Development and Garden Town Standards for New Settlements** - we welcome the commitment to ensuring green and blue infrastructure is integral to new development, including the provision of accessible green space. The Plan currently lacks any commitment to specific accessible green space standards.

7. **Policy Option 28: Homes: How many?** – this is still essentially a plan for substantial growth and we remain cautious that further development must be accommodated within our existing environmental constraints, improving rather than depleting our natural resources. On this basis, we believe that the lower option (essentially the Standard Method) is the most likely to enable Nature's recovery.

8. **Spatial Strategy Options** – OxEB would support a 'nature-first' approach whereby housing is placed around the Nature Recovery Network and Green Infrastructure Plan to ensure connectivity is enabled.

Overall, the Oxfordshire Environment Board believes that the Draft Plan incorporates a good suite of policies and we would be happy to work with the OP2050 team to make these as robust as possible, and to help our local authorities with implementation in due course.

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About the Oxfordshire Environment Board

The Oxfordshire Environment Board is an alliance of organisations concerned with the promotion, restoration and enhancement of the natural environment of the county. See www.oxeb.org

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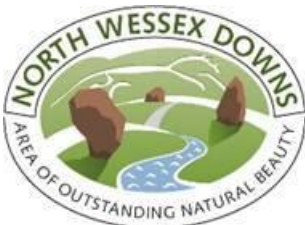E: andy.parsons@cotswoldsaonb.org.uk
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