

Matter 3: Issue 2 – Core Green Infrastructure Network – Policy G1

Q4 Is Policy G1 justified, effective and consistent with national planning policy, especially where the reuse and redevelopment of open space is proposed?

Policy G1 is not consistent with NPPF 104 because:

NPPF 104 requires reprovion to be equivalent or better whereas Policy G1 requires harm/loss to be mitigated by ensuring sufficient reprovion. This is, in and of itself, problematic.

NPPF 104 requires equivalent or better reprovion where facilities are not surplus to requirements whereas G1 requires particular attention to be paid to “local need arising from existing deficits of (recreation) spaces.”

It is not possible to determine whether a recreation ground is either needed or surplus to requirements or whether reprovion is sufficient without a recreation policy with standards against which that need or that reprovion can be judged.

Different types of green infrastructure require different standards: The Green Infrastructure Standards for England state that: “The Accessible Greenspace Standards do not cover formal sports provision, for which Sport England is responsible; nor play provision, which is covered by Play England.”

Conflating GI and recreation standards has already led to a situation in which planning officers conceded that e.g. Bertie Place Recreation ground would not be replaced by equivalent or better recreational provision, but this was seen as not undermining Green Spaces Strategy objective 04 as it maintained access to green space.

In a report to Planning Review Committee (9.9.26) OCC said: “Oxford City Councils Green Spaces Strategy 2013-2027 is a corporate policy on how the City Council will plan and manage the city's public parks and green spaces. Corporate policies should inform and support the Local Plan but they are not planning policy themselves. Such strategies set out what the authority wishes to achieve as an organisation. At Local Plan examination, Planning Inspectors will expect Local Plan policies to be justified by evidence (such as the Green Infrastructure Study) rather than simply because they appear in a corporate strategy. The Green Spaces Strategy, is a planning consideration which is given limited weight.”

The Green Spaces Strategy gives access AND design standards for recreational facilities. It already carries little weight and will expire in 2027. The Green Infrastructure Study gives only access standards, but it is not a policy document. At Planning Review Committee (9.9.26), OCC instead decided to cherry-pick ONE of the Fields in Trust (FIT) Standards. “‘Creating Great Spaces for All’ (2024) is not adopted by the Council as planning policy. However, the FIT Standards are a useful benchmark which suggests that ‘All homes should be within 200m-300m walking distance of open space with everyone having access to the full range of open space types with 1000m.’ But the FIT standards also include access standards for the different types of open space, and signposts to useful design standards.

The new NPPF requires local authorities to have a recreation policy. Although the 2045 plan is not being examined under the 2026 NPPF, if OCC doesn’t have a proper recreation policy, NPPF 104/CH7 becomes simply irrelevant.