

## **Background paper on Open Space and Standards**

- 1.1 This Background Paper explains the approach the Council has taken in the Draft Local Plan in respect of open space provision and the potential formulation of open space standards for inclusion in the Regulation 19 Publication version of the Local Plan. This paper does not consider the wider subject of green infrastructure, which is addressed in Background Paper BGP7 Natural Environment.
- 1.2 The Council's work on the provision of open space in the District continues and will include considering the option of including open space standards in the Local Plan to guide the provision of open space in future development proposals over the Plan period. This paper identifies relevant aspects of the existing Local Plan evidence base and includes consideration as to where there may be a need to undertake additional work to provide for the inclusion of open space standards and to inform the preparation of the publication version of the Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 The Local Plan Open Space Strategy will be closely linked to the Development Strategy for the District and ensure that appropriate levels of, and access to, different types of natural areas and open space for residents, workers and visitors are maintained.
- 1.4 National Planning Policy no longer requires local planning authorities to include open space standards in local plans. However, open space standards could identify the amount, type and location of open space to be provided in the District over the Plan period. Open space standards could guide the provision of open space in future development proposals and the use of Section 106 contributions or Community Infrastructure Levy (CIL) monies to improve the quality of existing open space, or make provision for new open space to serve new development. The application of standards will be considered as part of the further work to be commissioned on Local Plan Viability and the potential introduction of the CIL in the District.
- 1.5 The human experience of natural areas and open space has a significant impact on health including the mental health of the local population and as such is a critical aspect of the community's well-being<sup>1</sup>. The Council takes its responsibility for the provision and maintenance of open spaces very seriously.

### **Where we are now?**

- 1.6 The green spaces in the Districts' towns and villages are important to local people and visitors<sup>2</sup>. They offer outdoor space close to homes and places of work in which to walk and play, a focus for social gatherings, and in some locations, an opportunity to view local wildlife

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<sup>1</sup> Rolls S and Sunderland T, 2014, Microeconomic Evidence for the Benefits of Investment in the Environment 2 (MEBIE2). Natural England Research Reports No 057

<sup>2</sup> As evidenced by responses to successive community consultations i.e. Community Visioning 2011, Community Choices 2012.

on the doorstep. The Open Space Audit undertaken by the Council in 2009 identified that the quality of such spaces varies.

## National Planning Policy and Planning Practice Guidance

1.7 The Annex 2: Glossary to the National Planning Policy Framework defines "Open space" as

*"All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity".*

National Planning Policy on open spaces is contained within Chapter 8 of the NPPF under the heading 'Promoting healthy communities', as follows:

*"73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.*

*74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."*

1.8 The NPPF also notes at paragraph 76

*"Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances..... Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the plan period".* Please refer to Background Paper BGP4 Green Belt and District Open Land for further details.

The designation of District Open Land is intended to apply to areas of particular to communities that also meet the following relevant criteria for Local Green Space set out in paragraph 77 of the NPPF:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

1.9 The NPPF, unlike its predecessor Planning Policy Guidance Note 17: '*Planning for open space, sport and recreation*', does not require local planning authorities to set standards for a typology of open space in the local plan and, generally, is less prescriptive. Planning Practice Guidance (PPG) on 'Open space, sports and recreation facilities, public rights of way and local green space' advises that "*It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas*". Reference ID: 37-001-20140306

## Other Sources of Guidance

1.10 Statutory consultees advise on the provision of open space and recommend certain standards as a starting point to the consideration of provision in local plans. The most notable of these are Natural England in relation to accessible natural green space and Sport England in relation to assessing needs and the design of sports pitches (and facilities).

1.11 Natural England responded to the Council's consultation on Community Choices in 2012 with advice that advocates that the Council ensures that natural areas are provided as part of "*a balanced policy to ensure that local communities have access to an appropriate mix of green-space providing a range of recreational needs, of at least 2 hectares of accessible natural green space per 1,000 population*"<sup>3</sup>. The District is currently estimated to have 31.1 hectares of this type of space per 1,000 population far in excess of the standard<sup>4</sup>. In the same response, Natural England also recommends that this space is broken down by the following system<sup>5</sup> known as the Accessible Natural Green Space Standards (ANGSt) Model:

- no person should live more than 300m from their nearest area of natural green space;
- there should be at least one accessible 20 hectare site within 2 kilometres;
- there should be one accessible 100 hectare site within 5 kilometres; and
- there should be one accessible 500 hectare site within 10 kilometres.

1.12 In the report produced by Essex Wildlife Trust entitled '*Analysis of Accessible Natural Greenspace Provision for Essex, including Southend-on-Sea and Thurrock Unitary Authorities*' (2009), it was concluded that 98% of households in Epping Forest District had access to some form of accessible natural greenspace within the Natural England standard

<sup>3</sup> Response to Community Choices – Issues and Options Consultation 15 October 2012.

<sup>4</sup> 'Epping Forest District Council Open Space Sport and Recreation Assessment 2012

<sup>5</sup> Accessible Natural Green Space Standards in Towns and Cities A Review and Toolkit for their Implementation 2003 Natural England.

(this is cited in the 2012 study outlined below). In Natural England's advice to Epping Forest District Council<sup>6</sup> there is recognition that their standard should be a starting point for consideration of provision and that it is easier for some urban areas than others to meet the standard. Local Authorities are encouraged to identify the most appropriate policy and response applicable to their area.

## Key Evidence Sources

- 1.13 The study commissioned by the Council in 2012 entitled 'Epping Forest District Council Open Space Sport and Recreation Assessment' ("the 2012 Assessment") see <http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/2016/08/Epping-Forest-District-Council-Open-Space-Sport-and-Recreation-Assessment.pdf> was based on the evidence published in the 2009 Open Space Audit produced by the Council. The 2012 Assessment updated some of the 2009 Audit whilst some additional sites not covered in the 2009 Audit were also added.
- 1.14 The 2012 Assessment recommended a set of open space standards as a starting point for the Council to refine. In relation to the recommended standards the District has a good provision in terms of the quantity of the different types of open space - there were no shortages in the amount of open space across the District against the standards (with the exception of space provided for children's play which can be added to existing spaces). However, it found that some areas may benefit from improved access to certain types of open space<sup>7</sup>. In particular access to Managed Open Space could be mitigated through the appropriate characteristics of managed open space being applied to other types of open space such as Epping Forest Buffer Lands. In addition, access to Woodland, including semi natural open space and Epping Forest Buffer Land could be improved through the public rights of way system. Informal Recreation Grounds would benefit from improvements in quality. Finally, the recommendations regarding allotments related to seeking further opportunities in Epping Town and in some other areas to overcome deficiencies in accessibility of allotments. Allotments are provided at an existing level of 0.33ha/1000 population in the District – more than double the National Society of Allotment and Leisure Gardeners recommendation of 0.125ha/1000 population.<sup>8</sup>
- 1.15 During the preparation of the Draft Local Plan the Council has taken account of the recommended open space standards in the 2012 Assessment. The Council has prepared a Draft Infrastructure Delivery Plan 2016 (the Draft Infrastructure Plan) as part of the preparation of the Draft Local Plan. This identifies existing provision and shortfalls on a settlement basis in respect of types of open space based on the studies undertaken and noted above.

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<sup>6</sup> Response to Community Choices – Issues and Options Consultation 15 October 2012.

<sup>7</sup> Epping Forest Open Space, Sport and Recreation Assessment 2012 Executive Summary.

<sup>8</sup> Epping Forest Open Space, Sport and Recreation Assessment 2010 page 62

## Assessments for the Draft Local Plan 2016

1.16 The Epping Forest District Council Report on Site Selection (2016) (“Report on Site Selection”) identifies the site selection methodology as a staged process. Stage 2 Quantitative and Qualitative assessment contains criteria to assess the site in relation to their access to open space 4.3 Capacity to improve access to open space<sup>9</sup> where sites proposed for housing or employment uses were assessed in relation to the following scoring system:

(+) development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private;

(0) development unlikely to involve the loss of public open space;

(-) development may involve the loss of public open space but there are opportunities for on site off setting or mitigation;

(--) development may involve the loss of public open space with no opportunities for on site off setting or mitigation.

1.17 A small number of sites were put forward for assessment for development on land that is currently classified as urban open space within settlements and these are identified in the Report on Site Selection<sup>10</sup>. Stage 3 of the methodology to identify candidate preferred sites notes that this stage seeks the ‘best’ fit sites for the particular settlement and therefore assesses reasonable alternatives to accommodate growth in each settlement. This stage of the process notes that a sequential approach to site selection will be applied, in accordance with the proposed strategy for the Draft Local Plan as follows:

- the sequential flood risk assessments – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
- sites located on previously developed land within settlements;
- sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;
- previously developed land within the Green Belt;
- green field/ Green Belt Land on the edge of settlements:
  - of least value to the Green Belt if the land meets other suitable criteria for development;
  - of greater value to the Green Belt if the land meets other suitable criteria for development;

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<sup>9</sup> The detail of the approach to the evaluation of criteria 4.3 is found on page B100 of Appendix B1.4.1 to the Site Selection Report. In addition, the further detail is found in page B146 of Appendix B1.6.2.

<sup>10</sup> Appendix A to the Site Selection Report outlines the methodology whilst Appendix B1.4 contains the Stage 2 assessment and the detailed methodology for this stage. Appendix B1.4.2 contains the results of the Stage 2 Assessment

- of most value to the Green Belt if the land meets other suitable criteria for development.

- Agricultural land:

- of Grade 4-5 if the land meets other suitable criteria for development;
- of Grade 1-3 if the land meets other suitable criteria for development.

1.18 Sites which were identified at Stage 3 were then assessed through the following stages of site selection:

- Stage 4: Deliverability;
- Stage 5: Sustainability Appraisal/Habitats Regulation Assessment of Preferred sites
- Stage 6: Review of Preferred Sites following Draft Local Plan Consultation.

1.19 During stage 4 of the site selection process the cumulative impact of any loss of open space arising from proposed allocations was assessed. This cumulative assessment was undertaken at a settlement level with the underlying assumption that all new development would be able to meet the additional need for open space resulting from the increase in population.<sup>11</sup>

1.20 Three types of open space were considered as part of the cumulative assessment, which reflected the types of open space where sites allocations are proposed:

- managed open space;
- informal recreation space;
- allotments.

1.21 A brief commentary on these types of open space is found in each of the Settlement Proformas in Appendix C of the Site Selection Report <sup>12</sup> in the ‘Community Facilities’ section. The scoring for cumulative impact on open space in the settlement Criteria 3.1 is as follows:

(+)	0	(-)
There are no identified current deficiencies in the quantum of open space within the settlement. No open space is lost as a result of the proposed allocations in the settlement.	There are no identified current deficiencies in the quantum of open space within the settlement, however the cumulative impact of the proposed allocations would result in a reduction in land for open	There is a current deficiency in the quantum of open space within this settlement. The cumulative impact of the proposed allocations would result in a reduction in land for open space.

<sup>11</sup> Details on cumulative impact assessment are contained on Page B148 of Appendix B1.6.2

<sup>12</sup> Refer Appendix C

	space.	
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- 1.22 Each of the settlements was assessed and an overall rating of positive, neutral or negative for each settlement arrived at with a commentary. Assessment findings are reported in the appendices to the Site Selection Report<sup>13</sup>. A deficit was identified in the quantum of allotment provision within Epping Town Parish. However, the 2012 study had identified some under use of existing provision in Epping Town Parish, balanced against some waiting list demand at the time<sup>14</sup>.

### Site Allocations

- 1.23 The site selection process concluded that a small number of sites which would involve the loss of some open space on site should go forward as proposed allocations. All such proposed allocations assumed that a minimum of 25% of the open space would be retained when assessing the capacity of the site<sup>15</sup>. The proposed allocations are noted below:
- The Limes Estate (Managed Open Space) – Chigwell. There are no identified current deficiencies in the quantum of open space in the settlement. The site would be subject to a full masterplan that would seek to ensure that the retained amenity space (minimum 25%) is of a high quality.
  - Institute Road Allotments (Allotments) – Coopersale. There is an identified deficiency of allotments within the settlement of Epping. The cumulative impact of the proposed allocations would result in a reduction in land for allotments in the settlement. Opportunities for alternative provision will be explored.
  - Sandford Avenue/Westall Road Amenity Open Space (Managed Open Space) – Loughton. There are no identified current deficiencies in the quantum of open space in the settlement. Any development on the site would seek to ensure that the provision meets the needs of the future residents of the proposed development and retains a minimum of 25% of the site for high quality amenity space for local residents.
  - Colebrook Lane/Jessel Drive Amenity Open Space (Managed Open Space) – Loughton. There are no identified current deficiencies in the quantum of open space in the settlement. Any development on the site would seek to ensure that the provision meets the needs of the future residents of the proposed development and

<sup>13</sup> In this regard most notably Appendix B 1.6.4 Results of Stage 3 Capacity and Stage 4 Deliverability Assessments Criteria 3.1

<sup>14</sup> Paragraphs 2.100.6 and 2.101 Epping Forest District Open Space, Sport and Recreation Assessment 2012

<sup>15</sup> Report on Site Selection Appendix B1.5.3 explains the approach and the relevant site pro forma in Appendix B1.6.4 “Site Area” and “unconstrained site area” demonstrate a 25% reduction in the site area calculated for development capacity on these sites.

retains a minimum of 25% of the site for high quality amenity space for local residents.

- Waltham Abbey Community Centre, Saxon Way (Managed Open Space) – Waltham Abbey. There are no identified current deficiencies in the quantum of open space in the settlement. Any development on the site would seek to ensure that the provision meets the needs of the future residents of the proposed development and retains a minimum of 25% of the site for high quality amenity space for local residents.

- 1.24 The Council has proposed the introduction of a new policy designation of District Open Land to protect land to the south of Waltham Abbey (refer paragraph 5.63 of the Draft Local Plan) and South of North Weald Bassett (refer paragraph 5.121 of the Draft Local Plan). The proposed areas for designation are made by Draft Policy SP 5: Green Belt and District Open Land (see BGP4 Green Belt and District Open Land).

### **Draft Local Plan Policies**

- 1.25 The Draft Local Plan takes a comprehensive and proactive approach to the provision of open space through a green infrastructure approach and the protection of natural assets in the District<sup>16</sup>. It contains a large number of draft policies relevant to protecting and planning for new open space. These are considered briefly below.
- 1.26 Policy SP 5 (Green Belt and District Open Land) sets out the approach specifically to two areas that are proposed for designation as District Open Land.
- 1.27 Policy SP 6 (The Natural Environment, Landscape Character and Green Infrastructure) explains the Councils desire to improve upon and extend a full network of open spaces that will be used for a wide range of purposes. These green infrastructure ‘assets’ are to be protected and their value improved for biodiversity and community use and access.
- 1.28 Policy DM 4 (Suitable Accessible Nature Green Space and Corridors) is intended to ensure that as additional development occurs in the District, so access to additional open space is achieved. In particular, natural green space is considered important to provide alternatives to the Epping Forest. Such improvements can include improved access, improving the naturalness of the spaces and connections between open green spaces – again increasing the amount of accessible public open space.
- 1.29 Policy DM 5 (Green Infrastructure and Design of Development) sets out the Councils requirements of development to provide natural features and open spaces, and particularly notes that larger developments will be required to do so via the process of master planning.
- 1.30 Policy DM 6 (Designated and undesignated open spaces) allows for development to provide open space and links to open space in relation to standards to be developed should the

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<sup>16</sup> Refer Draft Local Plan 2016 paragraphs 3.99- 3.103



Council decide to do so based on evidence. It also allows in exceptional cases, for the development on part of open space only if it does not result in a total loss of open space. It places caveats on the remaining space where a partial loss is considered justified to ensure the remainder is predominantly open and its appearance and function for recreation is improved.

The suite of policies in the Draft Local Plan therefore make provision for increasing the amount of publicly accessible land in the District, ensuring that communities have access to the wide range of open spaces in the District and that new development makes provision for new high quality public amenity space for residents and existing communities. By applying the Local Plan policy and implementing the Infrastructure Delivery Plan the Council will seek to ensure that there continues to be suitable levels of public and private open space in future developments in the District.

## **Next Steps**

- 1.31 During the period between the Draft Local Plan consultation and the plan prepared for submission to the Secretary of State (and in light of the results of the Draft Local Plan consultation) consideration will be given to the question of whether a new standard for open space is required. This will include whether it continues to be appropriate to follow the standards recommended in the 2012 assessment in terms of quantum, quality and accessibility for the provision of the range of open spaces, recreation facilities and allotments. Future open space requirements relating to development and meeting the shortfall in allotment provision will be reflected within the Infrastructure Delivery Plan.