

**EPPING FOREST DISTRICT COUNCIL
EXAMINATION OF THE DISTRICT LOCAL PLAN, 2011-2033**

MATTER 9: DISTRICT OPEN LAND

**PRE-HEARING STATEMENT ON BEHALF OF
EPPING FOREST DISTRICT COUNCIL**

APRIL 2019

INTRODUCTION

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 9: District Open Land and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 1 (ED5, p 18).

Where appropriate, the Council's responses in this statement refer to but do not repeat detailed responses within the hearing statements submitted by the Council concerning other Matters.

Key documents informing the preparation of this statement to which the Council may refer at the hearing sessions include:

- [EB1608 Green Belt and District Open Land Background Paper \(2018\)](#)

All documents referred to in this statement are listed in **Appendix A** of this statement together with links to the relevant document included within the Examination Library.

Examination Library document references are used throughout for consistency and convenience.

Issue 1: Are the areas of District Open Land designated within the Plan justified and consistent with national policy?

Inspector's Question 1

- 1. Do the provisions of Policy SP6 concerning District Open Land (DOL) seek to do anything different to the policy on Local Green Space (LGS) in the NPPF (paragraphs 76-78)? If not, would it be clearer to use the LGS terminology?**

Response to Question 1

1. The provisions in Policy SP 6 seek to retain the land designated as District Open Land (DOL) in its current use by affording it the same protection as Green Belt Land. However, upon review of the three areas proposed for designation in the LPSV, the Council considers that their protection is consistent with paragraphs 76 to 78 of the NPPF and does not seek to do anything different. Therefore, the Council proposes to replace all references to District Open Land with Local Green Space in the plan and accompanying policies map.
2. In order to do this, a number of amendments to the plan will be required and these are set out in Appendix B to this statement.

Inspector's Question 2

If the DOL designation does not seek to depart from the LGS designation in national policy, does each site designated by the Plan (in NWB, Thornwood & Chigwell) meet the criteria in paragraphs 76-77 of the NPPF? Conversely, if the DOL designation seeks to do something different, are the designations justified with reference to the relevant criteria?

Response to Question 2

3. Section 5.3 of the Green Belt and District Open Land Background Paper (EB1608) sets out how the areas of District Open Land identified in the Local Plan Submission Version perform against the characteristics listed in Paragraph 77 of the NPPF. The Council considers that it is more appropriate for these areas to be

designated as Local Green Spaces in accordance with paragraph 77 of the NPPF, and a more detailed consideration of each is provided below.

Chigwell Village Green

4. The Council proposes to designate Chigwell Village Green, also known as the 'Glebe Land', as LGS because it is an important area of unmanaged open space which is integral to the historic form of the village and makes a significant contribution to the setting of the Chigwell Conservation Area. The Conservation Area Appraisal¹ confirms (at page 3) that the land is the "village green [...] which is an important area of unmanaged land and provides a natural setting to part of the Conservation Area". It is located in the heart of Chigwell Village adjacent to existing residential properties to the north west, south west and south east, and in close proximity to the amenities and services provided by the village including the primary school. The site is 1.8ha in size, is local in character and relates positively in scale to the village. A Public Right of Way crosses the Village Green, however the land is otherwise not publicly accessible.
5. The land is currently protected from development because it is within the Green Belt. However, as a result of the proposed alteration to the Green Belt to north east to account for development proposals for 59 dwellings connected to Chigwell Primary School, the land will no longer be afforded protection by the Green Belt, and does not benefit from any other designation that would protect it from development pressure.
6. On this basis, the Council proposes to designate this land as LGS because of its proximity to the local community, local historic significance to the setting of the Conservation Area, and to ensure its continued protection from inappropriate development.

Thornwood Common

7. This land comprises allotments, open green/recreation space use for informal sports, a children's playspace and the Parish Hall. It is located centrally within the village of Thornwood Common, functioning as a village green which is fully accessible by the public and owned and managed by North Weald Bassett Parish Council. It is of significant recreational and open space value for the village and its continued role within the centre of the village should be protected in the context of proposed residential and employment site allocations to the east, north and west of the site which are to be removed from the Green Belt.
8. The site is currently within the Green Belt, but does not benefit from any other designation which would protect it from development once the Green Belt is altered to facilitate proposed development on the site allocations in Thornwood. The site is 2.4ha in size, which is local in character and relates positively to the scale of the village. It is located in the centre of the village, adjacent to existing

¹ <https://www.eppingforestdc.gov.uk/wp-content/uploads/2019/01/chigwell-village-conservation-area.pdf>

residential properties at Brookfields, High Road and Weald Hall Lane, and will be adjacent to proposed development coming forward on residential site allocations THOR.R1 and THOR.R2

9. This land is described in North Weald Bassett Parish Council's Heritage and Character Assessment 2018² on pages 50 as being a recreation ground 'with the character and function of a village green' and that it 'provides amenity greenspace to the residents of Thornwood Common'.
10. On this basis, the Council seeks to designate Thornwood Common as a LGS, recognising its special recreational value at the heart of the local community, and to ensure its continued protection from inappropriate development.

Recreational space to the north of Tempest Mead, North Weald Bassett

11. This area of open space was designed as part of the housing scheme at Tempest Mead to provide access to open space for local residents. The development has taken place in the Green Belt which now constitutes a major anomaly, and the Council proposes an alteration to the Green Belt boundary. In order to maintain a defensible boundary, this area of open space is also proposed for release. The land does not benefit from any other designation.
12. It is within a few metres of the houses to the north of the estate and therefore is in close proximity to the community. It provides planned open space connected to the development of Tempest Mead, and provides recreational value to the local community. The area is small, its extent covering 0.78ha in total which is local in character and positively relates to the scale of the development at Tempest Mead. On this basis, the Council proposes to designate the land as LGS due to its local recreation value and to ensure its continued protection from inappropriate development.

Conclusion

13. In conclusion, all three areas of land proposed as LGS are consistent with paragraphs 76 to 78 of the NPPF and justified by their local significance, proximity to the local community, local character and the lack of other designations that could otherwise protect the land from inappropriate development.

² <http://www.efdclocalplan.org/wp-content/uploads/2018/07/Heritage-and-Character-Assessment-FINAL.pdf>

APPENDIX A: Examination documents referred to in this statement

Reference	Document Title	Author	Date
EB1608	Green Belt and District Open Land Background Paper	EFDC	2018

APPENDIX B: Proposed amendments to the LPSV, appendices and policies map

Location of proposed amendment	Proposed amendment
LPSV Paragraph 2.23 (page 18)	<p>The Vision for the Lee Valley Regional Park is included in the Local Plan under section 14(2)(a) of the Park Act. The delivery of the Vision is supported by the Local Plan through a number of policies including:</p> <ul style="list-style-type: none"> • Policy SP 6 Green Belt and District Open Land <u>Local Green Space</u>;
LPSV Map 2.2 (page 45)	[Map legend item]
LPSV Map 2.3 (page 46)	District Open Land <u>Local Green Space</u>
LPSV Map 2.4 (page 47)	
LPSV Map 5.1 (page 119)	
LPSV Map 5.3 (page 124)	
LPSV Map 5.6 (page 130)	
LPSV Map 5.8 (page 140)	
LPSV Map 5.10 (page 119)	
LPSV Map 5.12 (page 146)	
LPSV Map 5.13 (page 150)	
LPSV Map 5.14 (page 153)	
LPSV Map 5.15 (page 156)	
LPSV Map 5.16 (page 159)	
LPSV Map 5.17 (page 162)	
LPSV Map 5.18 (page 166)	

<p>LPSV Map 5.19 (page 167)</p> <p>LPSV Map 5.20 (page 168)</p> <p>LPSV Map 5.21 (page 169)</p> <p>LPSV Map 5.22 (page 170)</p> <p>LPSV Map 5.23 (page 171)</p> <p>LPSV Map 5.24 (page 172)</p>	
<p>LPSV Header (page 48)</p>	<p><u>Green Belt and District Open Land Local Green Space</u></p>
<p>LPSV paragraph 2.144 (page 51)</p>	<p>2.144 In some locations the alteration to the Green Belt boundary removes areas of land that are not proposed for change. This is because it would not make sense to create ‘holes’ in the Green Belt. An alternate designation that will provide the same level of protection as the Green Belt designation to these areas that are broadly in open space, recreation and leisure uses. <u>locally important green spaces which are not proposed for change, and which should benefit from continued protection from inappropriate development. These areas of green space at Thornwood Common, Chigwell Village Green and land at Tempest Mead North Weald Bassett are locally important because of their beauty, wildlife value, historic significance and/or recreational value, are closely connected to the community they serve, and are local in character and scale.</u> In accordance with the national planning policy a <u>Local Green Space designation of “District Open Land” is proposed these areas are designated as Local Green Spaces to ensure their continued protection.</u> In connection with the Green and Blue Infrastructure Strategy, opportunities will be sought to improve and enhance the</p>

	<p>newly defined District Open Land <u>designated Local Green Spaces</u>. The proposed areas are shown on the policies map.</p>
<p>Policy SP 6 Green Belt and District Open Land</p>	<p>Policy SP 6 Green Belt and District Open Land <u>Local Green Space</u></p> <p>A. Green Belt The general extent of the Green Belt is set out in Map 2.5. The detailed boundaries and inset settlements are defined in Chapter 5 and shown on the policies map. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy and Policy DM 4</p> <p>B. District Open Land <u>Local Green Space</u></p> <p>C. The same level of protection will be applied to areas of District Open Land <u>Local Green Space</u></p> <p>D. as is applied to Green Belt. The key characteristics of District Open Land <u>Local Green Space</u> are their <u>beauty, wildlife value, historic significance and/or recreational value</u>. It is not necessary for each of these characteristics to be present to be designated or retained as such.</p>
<p>LPSV Paragraph 4.32 (page 84)</p>	<p>4.32 Over 92% of the District is designated as Metropolitan Green Belt. Green Belt policy relates to the function and purposes of the Green Belt and not the intrinsic value of the land to which it relates such as its relative value for agriculture or biodiversity. Policy SP 5 Green Belt and District Open Land <u>Local Green Space</u> provides the strategic approach regarding the Green Belt within</p>

	the District. The impact of development on the purposes of the Green Belt can be significant and therefore must be carefully controlled.
LPSV Appendix 1 Glossary: District Open Land (page 197)	District Open Land <u>Local Green Space</u> Land outlined in this Local Plan that is intended to be afforded the same protection as Green Belt land via the use of a Local Green Space designation.
LPSV Appendix 2: SP 6 Green Belt and District Open Land (page 208)	SP 6 Green Belt and District Open Land <u>Local Green Space</u>
LPSV Appendix 3 Measures to monitor effectiveness (page 219)	Applications refused on the grounds of harm to the Green Belt or District Open Land <u>Local Green Space</u> by type and location
LPSV Appendix 4 Policy Designations: District Open Land (page 228)	District Open Land <u>Local Green Space</u> DOLLGS01 <u>Tempest Mead North Weald Bassett</u> DOLLGS02 Thornwood <u>Common</u> DOLLGS04 Chigwell <u>Village Green</u>
LPSV Appendix 6 Site Specific Requirements for Site Allocations: Map Legend (pages 4, 31, 71, 91, 110, 118, 125, 145, 153, 163, 177, 187, 191, 195, 200, 205, 209, 217, 224, 250 and 254)	[Map legend item] District Open Land <u>Local Green Space</u>
Policies Map Legend	[Map legend item] District Open Land <u>Local Green Space</u>