



**London Borough of Enfield**

# **Green Belt and Metropolitan Open Land Study**

**Final Report**

June 2021



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# Chapter 1

## Introduction

**1.1** LUC has been commissioned by the London Borough of Enfield to undertake an independent assessment of the Green Belt and Metropolitan Open land (MOL) within the borough. The study will form an important piece of evidence for the borough's new Local Plan and subsequent Local Plans.

### Study aim and scope

**1.2** The overall purpose of the study is to undertake an independent, robust and transparent assessment Green Belt land and MOL within the borough in line with national policy, guidance and case law.

**1.3** **Figure 1.1** illustrates the location of Enfield Borough in Greater London and its relationship with the Metropolitan Green Belt. The borough's Green Belt forms part of the wider Metropolitan Green Belt around London and is contiguous with the Green Belt in the neighbouring local planning authorities of Barnet, Broxbourne, Epping Forest, Hertsmere, Waltham Forest, and Welwyn Hatfield.

**1.4** The study draws out strategic variations in the contribution of Green Belt land to the five Green Belt purposes, set out in the National Planning Policy Framework (NPPF)<sup>1</sup>, and assesses the potential harm to the designation if any land were to be de-designated from the Green Belt through the Local Plan process. With regard to MOL, the study assesses land against the four criteria for designating new MOL, set out in the London Plan<sup>2</sup>, and the harm of release to the designation. By drawing out such variation, the study identifies areas of designated land which perform relatively strongly and relatively poorly against the relevant Green Belt and MOL criteria. The study also establishes the potential harm of releasing specific site options from the designations.

### Use of study outputs

**1.5** The study outputs provide the Council with the necessary evidence to consider if alterations to Green Belt and / or MOL boundaries should be made through the Local

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<sup>1</sup> Department of Communities and Local Government, 2019, National Planning Policy Framework [online] available at: <https://www.gov.uk/government/publications/national-planning-policy-framework>-2

<sup>2</sup> Mayor of London, The London Plan, March 2021, available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Plan-making process, and if so where the most appropriate locations are likely to be in Green Belt and MOL terms.

**1.6** These outputs inform only part of a necessary ‘exceptional circumstances’ case for making alterations to Green Belt and / or MOL boundaries. As such, the study does not recommend where Green Belt and MOL boundaries should be altered. To build a complete and robust exceptional circumstances case, consideration must also be given to the outputs of this study in combination with other important elements of the borough’s Local Plan evidence base, including the borough’s Capacity Study, the Local Plan Integrated Impact Assessment<sup>3</sup>, and the deliverability of preferred site options as determined through Whole Plan viability testing.

## Study engagement

**1.7** Local planning authorities have a Duty to Cooperate<sup>4</sup> with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 20 of the NPPF sets out the strategic topics for which Local Plan strategic policies should be prepared, including population and economic growth and associated development and infrastructure and facilities, climate change and the conservation and enhancement of the natural, built and historic environment. All these topics either have a direct or indirect link to land designated as Green Belt and / or MOL. Consequently, a method statement was produced for consultation with the stakeholders with whom the Council has a duty to cooperate. This included neighbouring local planning authorities, the Greater London Authority (GLA), Environment Agency, Historic England and Natural England. The methodology was also shared with developers and landowners in the borough. The consultation ran from the 23<sup>rd</sup> April to the 7<sup>th</sup> May 2020.

**1.8** All consultation comments received were reviewed and summarised in a consultation log. Responses to all comments relevant to the study methodology are included in the log, including notes on any necessary revisions to the methodology. The consultation log can be found in **Appendix A**.

## Report authors

**1.9** This report has been prepared by LUC on behalf of Enfield Borough Council. Earlier iterations of the report were peer-reviewed by AECOM. LUC is completing several Green Belt and MOL studies at a range of scales across the country, and has completed similar studies on behalf of over 50 English local planning authorities. All of our studies that have been tested at Examination have been found sound to date.

## Report structure

**1.10** The remainder of this method statement is structured as follows:

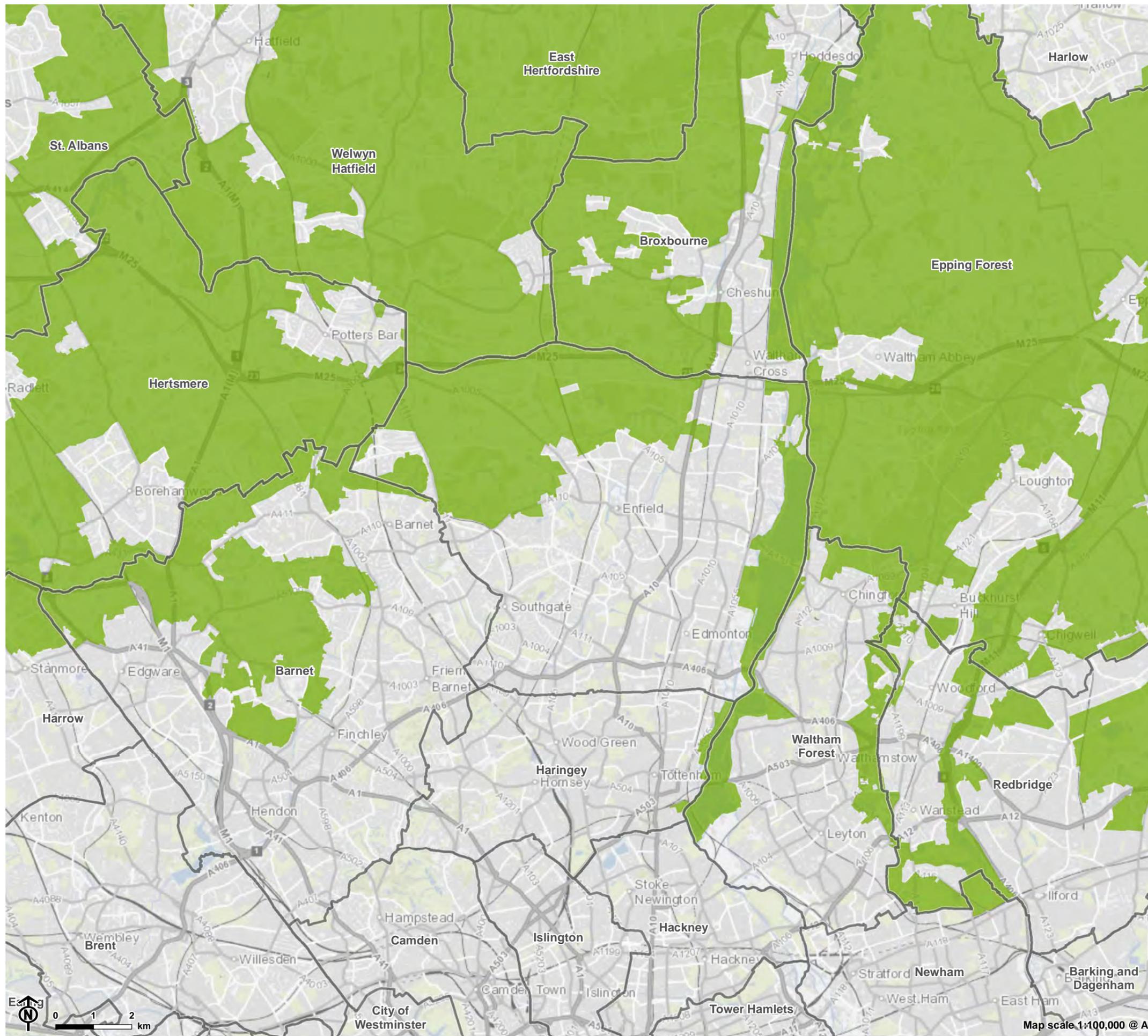
- **Chapter 2** – Policy context.
- **Chapter 3** – Environmental context.
- **Chapter 4** – Green Belt assessment methodology.
- **Chapter 5** – MOL assessment methodology.
- **Chapter 6** – Borough Green Belt assessment findings.
- **Chapter 7** – Borough MOL assessment findings.
- **Chapter 8** – Site assessment findings.
- **Chapter 9** – Next steps.
- **Appendix A** – Method statement consultation log.
- **Appendix B** – Green Belt harm assessment proforma.
- **Appendix C** – MOL harm assessment proforma.
- **Appendix D** – Site assessment proforma.

<sup>3</sup> To meet the requirements of the European Directive for SEA (Stages B and C), and EqIA, CSIA, HIA and HRA requirements.

<sup>4</sup> Section 110 of the Localism Act (2011)



Figure 1.1: Green Belt wider context



-  Local Authority boundary
-  Green Belt



Map scale 1:100,000 @ A3



## Chapter 2

### Policy Context

**2.1** This chapter summarises the national, regional and local planning policy, associated case law, and Inspectors' reports relevant to both the Metropolitan Green Belt and MOL. This information has been used to develop the methodology used to assess the contribution of Green Belt land and MOL to their respective purposes and assess the potential harm of releasing Green Belt land and MOL on the designations' purposes.

#### Origins of the Metropolitan Green Belt

**2.2** The Metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a 'green girdle'. In 1935 the London County Council put forward a scheme *"to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable"*. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.

**2.3** During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie's Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

**2.4** In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- checking growth of large built-up areas;
- preventing neighbouring settlements from merging; and
- preserving the special character of towns.

**2.5** Emphasis on the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries

only to be amended in exceptional circumstances was established through the Government's Circular 14/84.

**2.6** In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- to safeguard the surrounding countryside from further encroachment; and
- to assist in urban regeneration.

**2.7** PPG2 was replaced by the NPPF in March 2012. The NPPF was revised and re-published in July 2018 and in February 2019, and this iteration currently sets out national Green Belt policy. The position of the Government in relation to Green Belt policy, provided through the NPPF, is detailed later in this chapter.

**2.8** The Greater London Development Plan, approved in 1976, defined the full extent of the Metropolitan Green Belt, including within Enfield. It stated that "*The Green Belt gives definition to the built-up area as a whole, limits urban sprawl and provides an area where open recreational activities can take place. At the same time it plays an important role in the retention of areas of attractive landscape on London's fringes*".

**2.9** As of March 2018<sup>5</sup>, the Metropolitan Green Belt covers around 513,860 hectares across 68 local authorities distributed between the regions of London, East of England and the South East. It accounts for approximately 32% of the total 1,629,510 hectares of Green Belt land in England.

## Origins of Metropolitan Open Land

**2.10** MOL was introduced in the Greater London Development Plan (GLDP), adopted in 1976. Its origins, however, can be found in the Public Open Space designation in the 1944 Greater London Plan and the Initial Development Plans, although MOL also includes land in private ownership.

**2.11** The GLDP did not define the purposes of MOL; rather it described it as open land in public and private ownership which provides attractive breaks in the built-up area and is of significance to London as a whole. It stated that it should be the role of planning authorities to conserve and protect it, indicating that 'many areas are public and their future is safe; but others are at risk'. The Plan recognised that these areas are not appropriately situated for inclusion in the Green Belt because they form 'islands embedded in the urban fabric or penetrating deeply into the urban area as green wedges'.

However, it is indicated that they should be 'safeguarded for predominantly open uses as much as Green Belt'.

**2.12** The London Planning Advisory Committee (LPAC) produced a more detailed definition of MOL using four criteria set out in the Strategic Planning Guidance for London (1994). These criteria were the first iteration of MOL criteria included in the adopted London Plan. Two years later, the Secretary of State published MOL guidance in its 'Strategic Guidance for London Planning authorities' (RPG3) in 1996. RPG3 identified very similar criteria to the Strategic Planning Guidance for London (1994) but added further guidance:

*'Where isolated pockets of Green Belt exist that are not part of a continuous pattern of open land surrounding London, authorities should consider whether it would be more appropriate to designate the land as MOL in recognition of its location and use, having regard to the guidance on MOL...';*

and

*'Although MOL may vary in size and primary function across London, particularly between inner and outer London, there is a need for greater consistency between Boroughs and its designation. The designation of too small or more locally significant areas, for example, will devalue the strength of the designation as a whole. If the land does not serve a catchment area of strategic significance or draw visitors from several Boroughs it may be more appropriate to propose and justify other local designations'.*

**2.13** This general approach has been carried forward into the current London Plan (2016), which replaced RPG3. A new London Plan has been published for consultation by the GLA. Current and evolving MOL policy is detailed in the following section.

## National planning policy and guidance

### National Planning Policy Framework

**2.14** Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)<sup>6</sup> Protecting Green Belt Land. Paragraph 133 of the NPPF states that "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*".

**2.15** This is elaborated in NPPF paragraph 134, which states that Green Belts serve five purposes, as set out below.

<sup>5</sup> Ministry of Housing, Communities & Local Government (2018) Local Planning Authority Green Belt: England 2017/18. Available at: <https://www.gov.uk/government/collections/green-belt-statistics>.

<sup>6</sup> Department of Communities and Local Government (2018) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2>.

### The purposes of Green Belt

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**2.16** The NPPF emphasises in paragraphs 135 and 136 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state that *“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*

**2.17** When defining Green Belt boundaries NPPF paragraph 139 states local planning authorities should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period;
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

**2.18** The NPPF goes on to state *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (paragraph 141).

**2.19** It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

**2.20** Paragraph 143 and 144 state that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”*

**2.21** New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 145 which sets out the following exceptions:

- *“buildings for agriculture and forestry;*
- *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages;*
- *limited affordable housing for local community needs under policies set out in the development plan; and*
- *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
  - *not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or*
  - *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

**2.22** Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These are:

- *“mineral extraction;*
- *engineering operations;*

- *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
- *development brought forward under a Community Right to Build Order or Neighbourhood Development Order.”*

**2.23** Finally, paragraph 135 states Green Belts should only be established in exceptional circumstances... and in proposing new Green Belt, local planning authorities must:

- demonstrate why alternative policies would not be adequate;
- set out the major change in circumstances the make the designation necessary;
- communicate the consequences for sustainable development; and,
- highlight the consistency of the new designation with neighbouring plan areas and the other objectives of the NPPF (paragraph 135).

**2.24** The new London Plan<sup>7</sup> states that “MOL is afforded the same status and level of protection as Green Belt”. Consequently, the principles of this national Green Belt policy are equally relevant to London’s MOL designation.

### Planning Practice Guidance

**2.25** The NPPF’s Green Belt policies are supplemented by additional national Planning Practice Guidance (PPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects<sup>8</sup>. Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness; and

- the degree of activity likely to be generated by development, such as traffic generation.

**2.26** The guidance also elaborates on paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- *“new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”*

**2.27** Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

### Planning Advisory Service Guidance

**2.28** Neither the NPPF or PPG provide guidance on how to undertake Green Belt studies. However, the Planning Advisory Service (PAS) published an advice note<sup>9</sup> (2015) that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in **Chapter 4** where relevant.

### The London Plan

**2.29** The role of the Green Belt is also reflected in the London Plan. Policy G2 of the adopted London Plan<sup>10</sup>2021 states:

<sup>7</sup>Mayor of London, The London Plan, Intend to Publish version, December 2019, available at: [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_clean.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf)

<sup>8</sup>Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016))

define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section below.

<sup>9</sup>Planning on the Doorstep: The Big Issues – Green Belt, <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

<sup>10</sup> Mayor of London, The London Plan, March 2021. [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

- a) *The Green Belt should be protected from inappropriate development:*
- 1) *development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*
  - 2) *subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*
- b) *Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.*

**2.30** The supporting text to Policy G2 states that the Mayor strongly supports the continued protection of the Green Belt and will work with Boroughs to enhance access to it and improve the quality of derelict areas of Green Belt.

**2.31** The adopted London Plan also affords MOL the same status and level of protection as Green Belt through Policy G3. Policy G3 states that MOL should be protected from inappropriate development in accordance with national Green Belt policy and should be enhanced to improve its quality and range of uses. In the supporting text references is made to the following potential uses: improving public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage. Policy G3 also states that the extension of MOL should be supported where appropriate. To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

#### The criteria for MOL designation

- 1) It contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- 2) It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole or significant parts of London.
- 3) It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.
- 4) It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.

**2.32** Policy G3 outlines the same process for making alterations to MOL boundaries as Green Belt, i.e. evidencing the necessary exceptional circumstances, taking into account the MOL criteria.

**2.33** The supporting text to the London Plan MOL Policy G3 states MOL is strategic open land within the urban area that protects and enhances the open environment and improves Londoners' quality of life. In considering whether there are exceptional circumstances to change MOL boundaries alongside waterways, boroughs should have regard to Policy SI 14 Waterways – strategic role to Policy SI 17 Protecting and enhancing London's waterways and the need for certain types of development to help maximise the multifunctional benefits of waterways including their role in transporting passengers and freight.

## Local planning policy

### Enfield Core Strategy (2010)

**2.34** The Council adopted the Core Strategy in November 2010. The Core Strategy sets out the spatial planning framework for development of the borough over the next 10 to 20 years. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure. It contains core policies for guiding patterns of development.

**2.35** Core Policy 33 – Green Belt and Countryside states that:

*“The Council will continue to protect and enhance Enfield’s Green Belt. The strategic Green Belt boundary is shown on the Proposals Map. Proposals for changes to the detailed boundary at the local level will be brought forward as part of the Development Management Document subject to criteria set out in Planning Policy Guidance 2 and reflecting more local priorities.*

*Middlesex University’s Trent Park campus and the Picketts Lock leisure complex are identified as Major Development Sites within the Green Belt, the boundaries of which are shown on the Proposals Map. Where existing uses become redundant, the Council will work with partners to prepare planning briefs or masterplans in order to guide appropriate future development that preserves and enhances the character of the Green Belt.*

*The Council acknowledges the need for utilities companies to be able to carry out their statutory functions. Where this requires development within the Green Belt boundary, the Council will consider applications as cases of potential exceptional circumstance.*

*The Council acknowledges that exceptional circumstances may be presented by the need for diversification of the farming industry and for continued business growth in the Crews Hill defined area (as shown on the Proposals Map). The Development Management Document will set out specific criteria for assessing proposals of this nature that fall within the Green Belt.*

*In order to support the GLA's Green Arc initiative, the Council will promote positive uses for the use of the Green Belt whilst meeting its statutory purposes, as identified in the North London Sub-Regional Development Framework.*

*The Development Management Document and Enfield Design Guide Supplementary Planning Document will set out criteria for assessing proposals in Areas of Special Advertisement Control and Areas of Special Character as shown on the Proposals Map."*

**2.36** Core Policy 33 makes reference to two Major Developed Sites in the Metropolitan Green Belt: the former Middlesex University Trent Park campus and the Pickett's Lock Leisure Complex. These areas are subject to ongoing development pressures.

**2.37** Core Policy 34 – Parks, Playing Fields and Other Open Spaces, states that the Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space in the borough by protecting MOL and extending its designation to include green chains that meet MOL designation criteria.

#### Enfield Development Management Document (2014)

**2.38** The Council adopted the Development Management Document in November 2014. The Development Management Document contains detailed criteria and policies for assessing planning applications within the borough, including relating to protection of the Green Belt (DMD82), development adjacent to the Green Belt (DMD83), major developed sites (DMD89) and the Crews Hill Defined Area (DMD90). These policies relate to the specific form of development, and so are not considered relevant to this strategic assessment of contribution to Green Belt purposes. They would however be relevant to any subsequent consideration of suitability of particular areas of land for development. Similarly, this study makes no reference to the designated Areas of Special Character to which policy DMD84 relates; these are concerned with landscape quality, which is not a consideration in Green Belt assessment.

**2.39** The existence of a defined area around Crews Hill, within which planning policy is designed to prevent residential development and to avoid further erosion of horticultural character, reflects the fact that this area is subject to ongoing development pressures.

**2.40** Similarly, the policy relating to development in MOL, Protection and Enhancement of Open Space (DMD71), indicates that this will be refused except in very special circumstances.

#### Strategic Review of the Green Belt

**2.41** As part of the evidence base for the Core Strategy the Council prepared a Strategic Review of the Green Belt in 2010. This resulted in updates and adjustments to address the creation of Enfield Island Village, a strategic development which occurred after the original Metropolitan Green Belt designation, and local Borough boundary changes that had come into effect after the adoption of Enfield's 1994 Unitary Development Plan, but did not constitute a comprehensive review of the Metropolitan Green Belt land within Enfield.

#### Detailed Review of Green Belt Boundaries

**2.42** A detailed review of Green Belt boundaries<sup>11</sup> was carried out in 2013 in line with Core Strategy Paragraph 8.68 which stated that: "*The Council will set out criteria and undertake a detailed review of Green Belt boundaries in accordance with PPG2 and the local character. This work will inform the Development Management DPD*".

**2.43** The review focused on the defensibility of boundaries in order to suggest minor changes and did not consider strategic changes or measure the contribution of land to Green Belt purposes.

#### Metropolitan Open Land and Green Chains Review

**2.44** A review of the borough's MOL and Green Chains was carried out in 2013 to support the policies in the Development Management Document. The review identified and recommended proposed changes to the list of open spaces currently designated as MOL or Green Chains on the Core Strategy Policies Map.

**2.45** Of the 45 spaces assessed, there were no changes to 14 of them. The boundaries of 22 spaces were amended due to past cartographic inconsistencies or subsequent development. One local open space was designated as MOL. The Council extended the MOL designation to include Green Chains that meet one of the MOL designation criteria set out in the London Plan. As a result, nine green chains were re-designated as MOL.

#### Area Action Plans

**2.46** Area Action Plans deliver location-specific policies to guide development in areas of the borough in which strategic growth is envisaged. Two of the three areas subject to Area Action Plans include elements of Green Belt:

- The Lee Valley between the M25 in the north and Ponders End in the south is included within the study area of the North East Enfield Area Action Plan.

<sup>11</sup> Detailed Green Belt Boundary Review, March 2013 (Enfield Council)

- The Pickett's Lock complex and Green Belt land between the William Girling Reservoir and the A406 North Circular are included within the area of the Edmonton Leaside Area Action Plan.

**2.47** The role of Green Belt, and relationship between Green Belt land and the urban edge, is an important consideration in development proposals and master-planning for these areas.

### New Enfield Local Plan (2018 – 2036)

**2.48** The Council carried out an Issues and Options consultation in late 2018 and early 2019. The Issues and Options consultation document included a draft policy approach for Green Belt and MOL, which stated that *'The Council will protect Green Belt and Metropolitan Open Land (MOL) for the purposes in accordance with the NPPF'*. It will do this by:

- Resisting new development regarded as inappropriate development as set out in the NPPF; and
- Supporting development which improves access to Green Belt areas for beneficial uses such as outdoor

sport and recreation, where there is no conflict with protecting the openness of such land.

**2.49** The draft policy approach also states that the Council *'will undertake a Green Belt boundary review to assess if areas of the borough's existing Green Belt still meets the purposes as set out in paragraph 134 of the new NPPF, and whether exceptional circumstances exist to justify changes to Green Belt boundaries to ensure the Council can plan positively to promote sustainable patterns of development and the growth needs of the borough'*.

**2.50** The Issues and Options document sets out the borough's broad options for growth, one of which includes a 'strategic plan-led approach to Green Belt'. The documents acknowledges the strong sustainability arguments in favour of developing some Green Belt land, particularly around existing sustainable transport links, but only if it can be demonstrated as necessary in line with the requirements of the NPPF.

## Neighbouring authorities' Green Belt and MOL studies

Table 2.1 Neighbouring Green Belt and MOL studies

Authority	Study
Borough of Broxbourne	<p><b>Review of the Green Belt for the Preparation of Local Development Framework (LDF) (March 2008) – Scott Wilson</b></p> <p>Broxbourne's Green Belt was reviewed in 2008. Only the first three purposes were assessed, with Broxbourne not being considered to contain any land warranting assessment in terms of contribution to the setting of historic towns (purpose 4).</p> <p>No land between Cheshunt and the southern boundary of the district (with Enfield) was considered to make a weak contribution to Green Belt purposes, and recognition was given to the role of this area in separating the large urban area within Broxbourne from London.</p> <p><b>Green Belt Topic Paper (June 2017) – Borough of Broxbourne, Planning Policy Team</b></p> <p>Assessed available evidence including evidence of the emerging strategy underpinning the Local Plan to judge whether there are specific locations where exceptional circumstances could be demonstrated to release Green Belt land. The report concluded there are 14 sites making up 467 hectares where the Green Belt could be released.</p> <p>Broxbourne Borough is not a London Borough and therefore does not contain any MOL.</p>
District of Epping Forest	<p><b>Green Belt Review Stage 1 Report and Parcel Assessments (2015) – EFDC</b> <b>Green Belt Assessment: Phase 2 (2016) – LUC</b></p>

Authority	Study
	<p>The Epping Forest Green Belt was reviewed in two stages.</p> <p>Stage one was carried out by the Council in 2015. The purpose of this was to undertake a high level review of the Green Belt land in the District to identify the contribution of the Green Belt towards national Green Belt purposes.</p> <p>The study considered only the first four purposes. Generally, land around Harlow was considered to make a strong contribution to purpose 1. Land that fell in the gaps between Buckhurst Hill and Chigwell, Loughton and Buckhurst Hill, Loughton and Theydon Bois, Theydon Bois and Epping and Waltham Abbey and Theydon Bois made the strongest contribution to purpose 2, while the majority of the Green Belt in the District was considered to make a strong, or relatively strong contribution to purpose 3.</p> <p>Only three parcels were considered to make a relatively strong or strong contribution to purpose 4 and these were land east of Chipping Ongar, at Lee Valley Park and North West of Epping. Purpose 5 was not considered in the study.</p> <p>A large area, including land adjacent to all inset settlements regardless of the Stage 1 assessed contribution for the parcels in question, was included in the Stage 2 assessment of smaller parcels.</p> <p>Land considered to have sufficient environmental constraint to preclude development, including areas subject to flood risk (zone 2, 3a or 3b), designated SSSIs or Local Nature Reserves, was excluded from the second stage of assessment. This covers all of the Lee Valley border area with Enfield.</p> <p>Stage 2 assessment parcels were defined around Sewardstone and found to make a strong contribution to GB with regard to purpose 1 (the prevention of sprawl from large urban areas) and purpose 2 (the separation of towns), reflecting their location between Enfield, Chingford and Waltham Abbey.</p> <p>The Sainsbury warehouse and adjacent housing estate to the south of Waltham Abbey, close to the Enfield boundary, were identified as potential anomalies within the Green Belt, where lack of openness suggests that consideration could be given to amending the Green Belt boundary to exclude this development.</p> <p>Epping Forest District is not a London Borough and therefore does not contain any MOL.</p>
Borough of Hertsmere	<p><b>Hertsmere Borough Council, Green Belt Assessment Stage 1 (2017) - ARUP and Hertsmere Borough Council, Green Belt Assessment Stage 2 (2019) - ARUP</b></p> <p>Hertsmere Borough Council's Green Belt was reviewed as part of the preparation of the borough's new Local Plan using a two-staged approach. Stage 1 rated 'strategic area' parcels against each Green Belt purpose (except purpose 5), followed by the identification of sub-areas for further analysis at Stage 2. The stage 2 assessment included consideration of the effects of the release of sub-areas of Green Belt on the wider Green Belt. The methodology states that the assessment parcels may include Green Belt in neighbouring local authority areas where appropriate. The study found 14 areas that are recommended for further consideration in isolation (RA's), 7 areas recommended for further consideration in combination (RC's) and 3 areas recommended for further consideration as strategic cluster (RS's).</p>

Authority	Study
	<p>Hertsmere Borough is not a London Borough and therefore does not contain any MOL.</p>
<p>Borough of Welwyn Hatfield</p>	<p><b>Green Belt Review Purposes Assessment (2013) - SKM</b></p> <p>A Stage 1 Green Belt Assessment was undertaken in 2013 for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council by Sinclair Knight Merz (SKM). The purpose of this study was to review the existing Green Belt in the context of the NPPF (2012) and to consider the extent to which it contributes to the fundamental aim of retaining openness and the purposes of including land in the Green Belt. The Stage 1 work was followed by a Stage 2 study in Welwyn Hatfield Borough in 2014 prepared by Jacobs (formerly SKM). The Stage 2 study assessed a total of 67 Green Belt sites identified by the Welwyn Hatfield Borough Council Strategic Housing Land Availability Assessment (SHLAA), the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites and areas of the Green Belt recommended for further assessment in the Stage 1 study. In 2016 the Stage 2 study was supplemented with an addendum prepared by Welwyn Hatfield Borough Council. This comprised a Green Belt and a local purposes assessment of an additional 10 sites identified as suitable through the Housing and Employment Land Availability Assessment 2016. It was carried out by the Council using the methodology developed by Jacobs for the original Stage 2 Review.</p> <p>Welwyn Hatfield Borough Council submitted its draft Local Plan to the Secretary of State in May 2017 and its Examination is currently underway. At the end of the Stage 2 hearing session in October 2017, the Inspector identified a need for further work in order to expand the findings of the Council's Green Belt review evidence.</p> <p><b>Green Belt Assessment Updates (2018/2019) - LUC</b></p> <p>LUC was subsequently commissioned to undertake the additional work as part of a Stage 3 study. Stage 3 of the study divided the Green Belt into appropriate parcels for assessment (at a finer grain of detail than the Stage 1 study) and appraise these against the nationally defined purposes of the Green Belt as set out in the NPPF, ensuring consistency (where possible) with the Stage 1 and Stage 2 Green Belt studies. Conclusions were then drawn on the potential degree of harm that may occur if areas of land were released from the Green Belt, taking into account the contribution of the land to the Green Belt purposes, the potential impact on the wider integrity of the Green Belt and the strength/continuity of revised Green Belt boundaries. The Stage 3 study concluded that most land within Welwyn Hatfield makes a significant contribution to one or more of the Green Belt purposes. The closest of the 'most essential' areas of Green Belt identified in the study to the London Borough of Enfield are the Green Belt gaps between Welham Green, Brookmans Park and Potters Bar.</p> <p>Welwyn Hatfield Borough is not a London Borough and therefore does not contain any MOL.</p>
<p>London Borough of Barnet</p>	<p><b>Barnet Green Belt and Metropolitan Open Land Study Part 1 (2018) - LUC</b></p> <p>A joint Green Belt and MOL study was completed to inform the borough's next Local Plan. Consultation was carried in the summer of 2018 on a method statement for the assessment of the borough's Green Belt and MOL. The method statement contained draft criteria for the assessment of all Green Belt land against</p>

Authority	Study
	<p>the five Green Belt purposes, followed by details for the assessment of harm to Green Belt and MOL generated by the release of specific parcels of land. The results found that there are several pockets of Green Belt adjacent to the existing urban edges which make a weak or relatively weak contribution to the Green Belt's purpose.</p> <p>The results found there are two pockets of open land that are currently not designated as MOL or Green Belt are considered to have potential for designation as MOL or Green Belt, which are Big Wood and Turner's Wood.</p> <p>There are two areas of open Green Belt which are isolated from the wider open countryside and are therefore not part of a continuous pattern of open land surrounding London, so they have the potential to be re-designated as MOL.</p>
London Borough of Haringey	<p>The London Borough of Haringey contains both Green Belt and MOL. However, a review of the designations has not been undertaken in recent years. The borough's Strategic Policies DPD<sup>[1]</sup> and Development Management DPD protect Green Belt and MOL.</p> <p>Strategic Policy SP13 requires new development to protect and enhance Haringey's parks and open spaces. All new development must "<i>protect and enhance and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development.</i>"</p>
London Borough of Waltham Forest	<p><b>Green Belt and Metropolitan Open Land Review (2015) - LUC</b></p> <p>The Waltham Forest GB was assessed in 2015, as a single stage process. Only land within the borough was assessed, and only a narrow strip of GB runs along the eastern side of the Lee Valley, other than adjacent to the southern end of LBE, where Banbury Reservoir forms a wider block.</p> <p>Parcels within the narrow strip were generally considered to make a moderate contribution to Green Belt purposes, with the Lee Valley within Enfield, with reservoirs along most of its length, considered to provide the primary contribution to preserving the settlement gap between Enfield and Chingford. Contribution was considered stronger between Banbury Reservoir and the southern end of the William Girling Reservoir, where the gap across the Lee Valley is narrower and the remnant countryside is less affected by infrastructure.</p> <p><b>Focussed Green Belt and Metropolitan Open Land Assessment (2019) - LUC</b></p> <p>The previous study above suggested the most appropriate Green Belt and MOL that could be designated for development. However, other evidence sources found the borough's growth needs to be sustainably accommodated within the borough's built-up areas. The report focuses on 3 locations with the borough's Green Belt and MOL that were identified by the Council as areas for development. The report assesses the harm; to the designations if all or part of the land is developed.</p> <p>The locations include: Green Belt land off Shadbolt Avenue and Harbet Road, MOL at the Lee Valley Ice Centre and MOL at Waterworks Visitor Centre.</p>

<sup>[1]</sup> London Borough of Haringey 2013, Haringey's Local Plan Strategic Policies [online] available at: [http://www.haringey.gov.uk/sites/haringeygovuk/files/final\\_haringey\\_local\\_plan\\_2017\\_online.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/final_haringey_local_plan_2017_online.pdf)

**2.51** Ratings for assessment parcels cannot be directly compared across boroughs due to differences in the way in which purposes are assessed, but all reviews that have been carried out, or are proposed, recognise a relatively strong contribution to any one purpose can be sufficient to justify an assessment parcel's role.

## Chapter 3

# Environmental Context

**3.1** This chapter summarises all the information gathered on the environmental context of the borough and its immediate vicinity. This information has been used in the assessment of both Green Belt and MOL in subsequent chapters.

### Green Belt

**3.2** There are two main areas of Green Belt in Enfield: the majority lies in the north western part of the borough between the edge of London's built-up area and the M25; the remainder lies at the eastern edge of the borough within and directly adjacent to the Lee Valley Regional Park.

**3.3** Beyond the borough boundaries the Green Belt continues:

- West into Hertsmere District and the northern fringe of the London Borough of Barnet;
- North beyond the M25 into Welwyn Hatfield District and Broxbourne District; and
- East from the Lee Valley into Epping Forest District and a narrow strip of the Lee Valley within the London Borough of Waltham Forest.

**3.4** The borough's Green Belt context is illustrated in **Figures 1.1** and **3.1**.

### Metropolitan Open Land

**3.5** Many of the borough's larger open spaces are designated as MOL with 36 separate designated areas. These are illustrated in **Figure 3.1**. The MOL is spread reasonably evenly throughout the borough's urban area.

**3.6** The borough's areas of MOL have a broad range of uses, most notably:

- Playing pitches, fields and sports grounds;
- Schools and their playing fields;
- Allotments;
- Cemeteries;
- Public gardens;
- Parks;
- Golf courses; and
- Open space.

**3.7** Several areas of MOL are wholly or in part designated as Sites of Local Importance for Nature Conservation and / or Sites of Borough Importance for Nature Conservation. Several areas of MOL have green chains and wildlife corridors cutting east west and north south through the borough.

**3.8** The largest areas of MOL include:

- Enfield Golf Course, Worlds End Lane Open Space, school playing fields and sports grounds, Cheyne Walk Open Space and Allotments and Grange Park Railway Corridor;
- Enfield Playing Fields, allotments, Enfield Town Football Club and Kingsmead Academy School;
- Enfield Town Park and Bush Hill Golf Club; and
- Groveland Park, pitch and putt, playing fields, boating Lake and the Priory Hospital.

**3.9** It is noted that several schools and buildings associated with outdoor sports and recreation facilities sit within the borough's MOL.

### Settlement pattern and character

**3.10** Approximately 47.6% of the borough is relatively open and undeveloped: 37.3% is Green Belt, 7.1% is MOL and 3.2% is other open space. This leaves 52.4% of the area as urban developed land.

**3.11** The borough's character varies from dense urban and suburban residential and industrial areas to open areas with a rural character, reflecting its position between the built-up area of London and rural Hertfordshire.<sup>12</sup>

**3.12** The topography of the borough has influenced the settlement character, with the higher density development found on the flatter valley floors and lower density development on sloping and higher ground. In addition, radial road and rail connections have played a role in influencing the location of development.

**3.13** An emerging pattern of higher density development, including Victorian terraces, inter-war Garden City style housing and later freeform and street-based housing estates is found in the east of the borough, structured around a string of linear centres along the Hertford Road and edged by a band of large scale industrial development along the Lee Valley. Conversely, older suburban and urban housing is predominant in the central part of the borough, around historic centres such as Enfield Town, Southgate Green and Winchmore Hill.

**3.14** The western part of the borough, the northern area of which is dominated by Green Belt, has more of a pattern of lower density, larger suburban housing. This includes a series of 'Metroland' town centres providing the planned focus of surrounding communities.

**3.15** There is no defined settlement hierarchy in the borough due to the metropolitan nature of most settlements. However, drawing on map analysis and the Enfield Characterisation study, the developed areas listed below are identified as having adjacent Green Belt land.

**3.16** Settlement areas that are part of, or contiguous with the metropolitan urban area:

- Hadley Wood;
- Cockfosters;
- Oakwood;
- World's End;
- Gordon Hill;
- Forty Hill;
- Enfield Wash;
- Enfield Lock and Enfield Island Village;
- Ponders End; and
- Edmonton.

**3.17** Settlements that are inset into the Green Belt:

- Crews Hill (part).

**3.18** Settlements that are washed over by the Green Belt:

- Middlesex University – Trent Park (classified in the Development Management Document<sup>13</sup> as a major developed site in the Green Belt);
- Botany Bay;
- Clay Hill;
- Forty Hill;
- Bulls Cross; and
- Picketts Lock (classified in the Development Management Document as a major developed site in the Green Belt).

<sup>12</sup> Enfield Characterisation Study, Urban Practitioners, February 2011. Found at: <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>

<sup>13</sup> Development Management Document, Enfield Council, November 2014. Found at: <https://new.enfield.gov.uk/services/planning/dmd-adopted-planning.pdf>

## Routes

**3.19** The borough contains the following notable transport corridors (as shown on **Figure 3.2**):

- The Ridgeway (A1005), linking Enfield to Potters Bar, following high ground between Salmon's Brook and Turkey Brook – providing strong views across both valleys.
- A110 Enfield Road follows the ridge to the south of the Merrybrook Valley.
- The A111 Cockfosters Road links Cockfosters to Hadley Wood and on to Potters Bar.
- The M25 crosses landforms but forms a barrier feature between Enfield and Potters Bar.
- The Hertford Loop railway line links Enfield to Crews Hill and on to Cuffley, following a ridge between Turkey Brook and Cuffley Brook.
- Lee Valley: there is a strong north – south orientation of routes in the Lee Valley. On the valley's western terrace the A10 is the principal route, running mostly through the urban area but cutting through the Green Belt at one point. Railways also run north-south through the urban area. The A1055 and Lee Valley Line railway line run close to the eastern edge of Enfield, commonly marking a distinction between residential areas and riverside industrial and commercial development. The River Lee Navigation is a key landscape element within the Green Belt, and the River Lee (its course altered to accommodate the Valley's larger reservoirs) marks the borough boundary.

## Landform

**3.20** Higher ground in the north west of the borough slopes down gradually to flatter ground at the Lee Valley floor along the eastern edge of the borough. The high ground is incised by the watercourses – Salmon Brook, Turkey Brook, Cuffley Brook and smaller tributaries – which pass through the metropolitan area to feed into the River Lee.

**3.21** The Lee Valley is characterised by a string of large reservoirs, with King George's Reservoir and the William Girling Reservoir constituting the bulk of the Green Belt within the valley. The earthworks that contain the reservoirs are strong visual elements in the landscape, creating a barrier through the urban area.

**3.22** The borough has several historic parklands (as explained in more detail below), the well wooded character of

which contributes to the separation of the metropolitan edge and the rural fringes. Trent Park and Whitewebbs park are the principal wooded areas but there is also strong tree cover at Forty Hall, to the south of Clay Hill, to the west of Bulls Cross on the sides of Salmon's Brook Valley and to the south of Hadley Wood.

**3.23** Strong tree cover to the north of the M25, between Potters Bar and Cheshunt, strengthens the separation between Crews Hill and the inset Hertfordshire villages of Cuffley and Goff's Oak.

## Flood risk and climate change

**3.24** The borough of Enfield has more watercourses than any other London borough. Due to the topography, however, flood risk is generally limited to the areas immediately around the watercourses.

**3.25** However, much of the Green Belt and MOL in the Lee Valley is prone to flooding. Flood risk in the borough is illustrated on **Figure 3.3**.

**3.26** The borough's green spaces including countryside and open spaces, both of which play a major part in limiting the impacts of climate change, absorbing rainfall and air pollutants and combatting the heat island effect in London's built-up area. The population density and open space within the borough is shown on **Figure 3.4**.

## Historic environment

**3.27** Enfield's growth has focussed on a number of historic towns and villages. Several of these centres were formed along the London – Cambridge Road, including Edmonton and Ponders End. Enfield Town was established early on as an important market town and grew steadily from this base.<sup>14</sup>

**3.28** The River Lee was an important focus for trade and later industrial activity. Whilst much of the historic form established along the river has gone, remnants still remain.

**3.29** The historic origins of land use are still evident today. The existing band of industrial use along the Lee Valley has grown significantly and has resulted in a strong north – south belt of employment uses along the eastern edge of the borough. Similarly, the historic town centres have grown and have kept a mixture of retail, employment, community and residential uses. Between these town centres is predominantly residential use<sup>15</sup>.

<sup>14</sup> Enfield Characterisation Study, Urban Practitioners, February 2011. Found at: <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>

<sup>15</sup> Enfield Characterisation Study, Urban Practitioners, February 2011. Found at: <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>

**3.30** The Supplementary Planning Document ‘Making Enfield: Heritage Strategy 2019-24’<sup>16</sup> was developed by the borough to update existing guidance on heritage management and provide further information on the application of relevant policies within the Enfield Local Plan. The Strategy highlights the heritage significance of the borough’s green spaces – from grand scale formal landscapes to parks and incidental green space. It states that while these areas are valuable, their relative heritage value is not fully understood and there is the opportunity to undertake a Borough wide assessment of these assets. This work has yet to be undertaken.

**3.31** The Strategy also highlights the role of the Green Belt in protecting the rural fringe of the borough which include traces of former royal hunting grounds, field boundaries and substantial parkland from former rural estates.

**3.32** Enfield has 22 conservation areas, ranging from small local areas to larger former parkland estates. The following Conservation Area designations sit within the Green Belt:

- **Trent Park Conservation Area** lies just inside the southern boundary of the Green Belt, contrasting sharply in character to the suburbs of Oakwood and Cockfosters. The Conservation Area Appraisal notes: “The open nature of the park and agricultural landforms an important part of the wider landscape of the Green Belt” as well as “*the important role of the park as a backdrop. To the north, the park provides an important backdrop to the formal landscape and gardens surrounding the mansion, particularly in terminating long vistas.*” The Conservation Area Appraisal does not note any wider ranging views outside the boundaries of the Conservation Area.<sup>17</sup>
- **Clay Hill Conservation Area** covers the sparse development at Clay Hill. The creation of the Green Belt curtailed further suburban development after WWII and ensured the preservation of Clay Hill as an essentially rural area. The Conservation Area notes the following key views considered to be important to the setting and special character of the Conservation Area:
  - At the northern boundary of the Conservation Area at South Lodge tree cover falls away around the Whitewebbs Park golf course, giving good views of the rural landscape to the north.
  - Clay Hill reaches a plateau at the junction with Theobalds Park Road, Flash Lane and Strayfield Road, where again the landscape opens out. To the north, walls and hedges are replaced by post and

rail fences and individual trees, including a fine row of evergreen oaks opposite the Fallow Buck, which allow views over the rolling countryside to the north.

- Good views are to be had looking south across the valley from the footpath connecting St. John’s Church and the Turkey Brook towards the trees of the Lavender Hill cemetery.<sup>18</sup>
- **Forty Hill Conservation Area** lies just inside the eastern extent of the Green Belt at Forty Hall and Myddelton House. The Conservation Area Appraisal does not note any wider ranging views outside the boundaries of the Conservation Area, but does note the importance of “*the presence of extensive open land. This helps to preserve the individual nature of each settlement and gives the historic estates and hamlets an attractive landscape setting, particularly where it is parkland, woodland or agricultural land*”.<sup>19</sup>
- **Enfield Lock Conservation Area** lies in the Green Belt, forming the Prince of Wales Open Space (Character Area 2). The Conservation Area Appraisal notes that the southern half of the area is open and embraces the wider landscape. It also notes views “*South from the lock bridge along Swan and Pike Road and then across via Swan and Pike Pool to the River Lea towpath, there are fine views along the Lea Navigation’s tree and bush-lined banks to Swan and Pike Wood and towards open fields and trees, although the pumping station on the northern edge of the King George V reservoir looms on the horizon, and pylons take giant careless strides across the landscape. This section offers contrasting experiences of long views close to smaller more intimate wooded prospects...*”<sup>20</sup>
- **Ponders End Flour Mills Conservation Area** is entirely in the ownership of Wrights Flour Mills, which is washed over by Green Belt. The Ponders End Flour Mills Conservation Area Appraisal notes that the open water-meadows and fields within the conservation area maintains a fine picturesque setting for the listed buildings in the southern half of the conservation area. The Conservation Area Appraisal does not note any wider ranging views outside the boundaries of the Conservation Area.

**3.33** In addition, **Hadley Wood Conservation Area** borders the open Green Belt to the north, west and east, although views of the open countryside are restricted only to the west and north west. The Conservation Area Appraisal notes: “*attractive breaks occur in the street frontage on the north side*

<sup>16</sup> Making Enfield, Enfield Heritage Strategy 2019 – 2024 (2019). Available at: <https://new.enfield.gov.uk/services/planning/heritage-strategy-2019-24-planning.pdf>

<sup>17</sup> Trent Park Conservation Area Character Appraisal (2015).

<sup>18</sup> Clay Hill Conservation Area Character Appraisal (2015)

<sup>19</sup> Forty Hill Conservation Area Appraisal (2015)

<sup>20</sup> Enfield Lock Conservation Area Appraisal (2015)

of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods".<sup>21</sup>

**3.34** The Conservation Area Appraisals make no reference to the importance of the Green Belt to the setting and special character of the designations; however, the inclusion of portions of the Green Belt within designations suggests that the openness of the Green Belt has some historic value in these locations.

**3.35** The following conservation areas include MOL:

- Enfield Town Conservation Area includes Enfield Town Park, Chase Green Gardens and Enfield Grammar School and Enfield County Upper School Playing Fields. The Town Park provides a green setting for the area. There are long view of the park from a number of points along adjoining roads and paths. Chase Green Gardens separates the town centre from development farther north.<sup>22</sup>
- Turkey Street Conservation Area includes the very southern end of the open space at Turkey Street Station and Turkey Brook.

**3.36** The following conservation areas lie directly adjacent to open spaces designated as MOL:

- Grange Park Conservation Area lies adjacent to Bush Hill Golf Course and Cheyne Walk Open Space. The trees bordering these areas of MOL are important elements in the Conservation Area, forming dramatic backdrops to long views.<sup>23</sup>
- Highlands Conservation Area lies adjacent to Old Grammarians RFC (to the south of Enfield Golf Club and Worlds End Park); however, there is little visual linkage between the MOL and the Conservation Area.<sup>24</sup>
- Lakes Conservation Area lies adjacent to Broomfield Park and sportsground, the south of which faces across Broomfield Park, which was formed in the 18<sup>th</sup> century around Broomfield House. A number of roads in the Lakes estate slope down towards the park, although there are no significant views within the area.<sup>25</sup>
- Southgate Green Conservation Area lies adjacent to Broomfield Park. The sloping ground of Cannon Hill gives good views out over the Park to the south.<sup>26</sup>
- Winchmore Hill Conservation Area lies adjacent to the north eastern corner of Grovelands Park. However, the lack of any visual link between the village and park gives

the impression that the conservation area is completely surrounded by housing.<sup>27</sup>

- Meadway Conservation Area lies adjacent to the southern edge of Grovelands Park. There are views towards the open land and trees of the park from Bourne Avenue, Parkway and Greenway. The Park provides a major green setting for the whole conservation area.<sup>28</sup>

**3.37** There are five Registered Parks and Gardens in the borough, two of which are also designated as MOL:

- Broomfield House Registered Park and Garden (Grade II).
- Grovelands Park Registered Park and Garden (Grade II\*).

**3.38** There are a large number of listed buildings in the borough, some of which fall in the Green Belt or MOL.

**3.39** The largest Scheduled Monument is the site of Elsyng Palace, occupying the north-eastern part of the grounds of Forty Hall in the Green Belt.

**3.40** Two Scheduled Monuments are located in MOL, a medieval moated site at Enfield Golf Club and some earthworks at Bush Hill Golf Course. The borough's historic assets are illustrated on **Figure 3.5**.

## Green infrastructure and open spaces

**3.41** Enfield is one of the greenest boroughs in London, with a wealth of country and urban parks, farmland, woodland, grasslands and waterways. There is a total of 342 spaces over 0.4ha in size.

**3.42** Throughout the developed areas of the borough there is a good network of green spaces. This includes a mix of larger formal parks such as Grovelands Park and Enfield Town Park, and smaller local and pocket parks. The borough is also home to a number of golf courses, allotments and cemeteries.

**3.43** The south, west and central areas of the borough contain the greatest densities of green and open space. Larger district parks can be found in the south west, while the south east and north east contains smaller green spaces and pocket parks.

**3.44** However, it is noted that access to the borough's open countryside is somewhat limited as footpaths provide access to only certain areas and connection is further limited due to rivers, reservoirs and industrial uses.

<sup>21</sup> Hadley Wood Conservation Area Character Appraisal (2016).

<sup>22</sup> Enfield Town Conservation Area Appraisal (2015)

<sup>23</sup> Grange Park Conservation Area Character Appraisal (2015)

<sup>24</sup> Highlands Conservation Areas Character Appraisal (2015)

<sup>25</sup> The Lakes Estate Conservation Area Character Appraisal (2015)

<sup>26</sup> Southgate Green Conservation Area Character Appraisal (2015)

<sup>27</sup> Winchmore Hill Conservation Area Character Appraisal (2016)

<sup>28</sup> Meadway Conservation Area Character Appraisal (2015)

**3.45** The borough has 67 public park sites, which comprises pocket, local, linear open space, district, metropolitan and regional parks. These cover 35.2% of the open space in Enfield and are the most abundant form of open space provision<sup>29</sup>.

**3.46** The main urban parks, which are all designated as MOL, are:

- Grovelands Park;
- Oakwood Park;
- Pymmes Park;
- Arnos Park;
- Broomfield Park;
- Albany Park;
- Town Park;
- Durants Park; and
- Jubilee Park.

**3.47** The borough also has a couple of country parks; Trent Country Park and Whitewebbs Country Park.

**3.48** The borough's Parks and Open Spaces Strategy identifies Haselbury, Upper Edmonton and Edmonton Green as the areas with the best provision of public parks in the borough. Areas with a deficiency include the northern part of Cockfosters ward, large parts of the eastern Highlands and parts of central Grange.

**3.49** Just over a quarter of the borough's open space (27%) is comprised of playing fields and sports pitches. The main areas containing pitches are:

- Pymmes Brook;
- King George's Field;
- Enfield Playing Fields;
- Tottenham Sports Ground; and
- Clowes Sports Ground.

**3.50** The largest areas of playing fields are located near the dense centres of Enfield and Edmonton, with smaller playing fields being distributed relatively evenly across the rest of the borough. Areas where pitches are less accessible include the south of the borough, near the north circular and in the south east of the borough. There is also lower provision along the urban/rural fringe where population density is lower.

**3.51** There is a high demand for allotments in the borough. There are currently 42 sites, 40 of which are public. Most of the spaces are integrated with wider open spaces, although a number exist independently. The main allotment sites are:

- Fairbrook;
- Southgate Chase;
- Barrowell Green;
- Weir Hall; and
- Houndsfield.

**3.52** The greatest concentration of allotments is found in the southern part of the borough near the Great Cambridge Road. There are notably fewer allotments in the south east and south west of the borough.

**3.53** There are 14 cemetery sites in the borough, half of which are public. These are distributed across the southern and northern areas of the borough.

**3.54** There are 17 sites of Natural or Semi-Natural greenspace which include nationally important habitats such as native woodland (including ancient woodland) and species rich grassland. The main spaces include Cheyne Walk; Clay Hill Fields; and Covert Way Fields.

**3.55** The natural and semi natural spaces generally comprise small pockets of land within the urban area. Areas that are deficient in this type of open space include most of the west and central parts of the borough.

**3.56** Enfield has a large number of Sites of Importance for Nature Conservation, which includes Chingford Reservoirs, designated as a Site of Special Scientific Interest for populations of wildfowl and wetland birds.

**3.57** There are several golf courses in the borough, mainly located in the northern area between the edge of the urban area and the wider countryside. A number of these courses including the Lee Valley, Trent Park, Whitewebbs, Hadley Wood and Crews Hill are in the Green Belt, while others, Bush Hill and Enfield, are designated MOL.

**3.58** There are several Green Chains which run through the borough linking the borough's and neighbouring boroughs' MOL and Green Belt land.

**3.59** The Green Infrastructure and Open Environments: All London Green Grid Supplementary Planning Guidance<sup>30</sup> highlights a number of strategic links and corridors in the borough:

<sup>29</sup> London Borough of Enfield Parks and Open Spaces Strategy 2010-2020, Enfield Council, available at: <https://new.enfield.gov.uk/services/leisure-and-culture/parks-and-open-spaces-information-parks-and-open-spaces-strategy-2010-2020.pdf>

<sup>30</sup> Mayor of London, Green Infrastructure and Open Environments : The All London Green Grid Supplementary Planning Guidance, March 2012. Available at: [https://www.london.gov.uk/sites/default/files/algg\\_spg\\_mar2012.pdf](https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf)

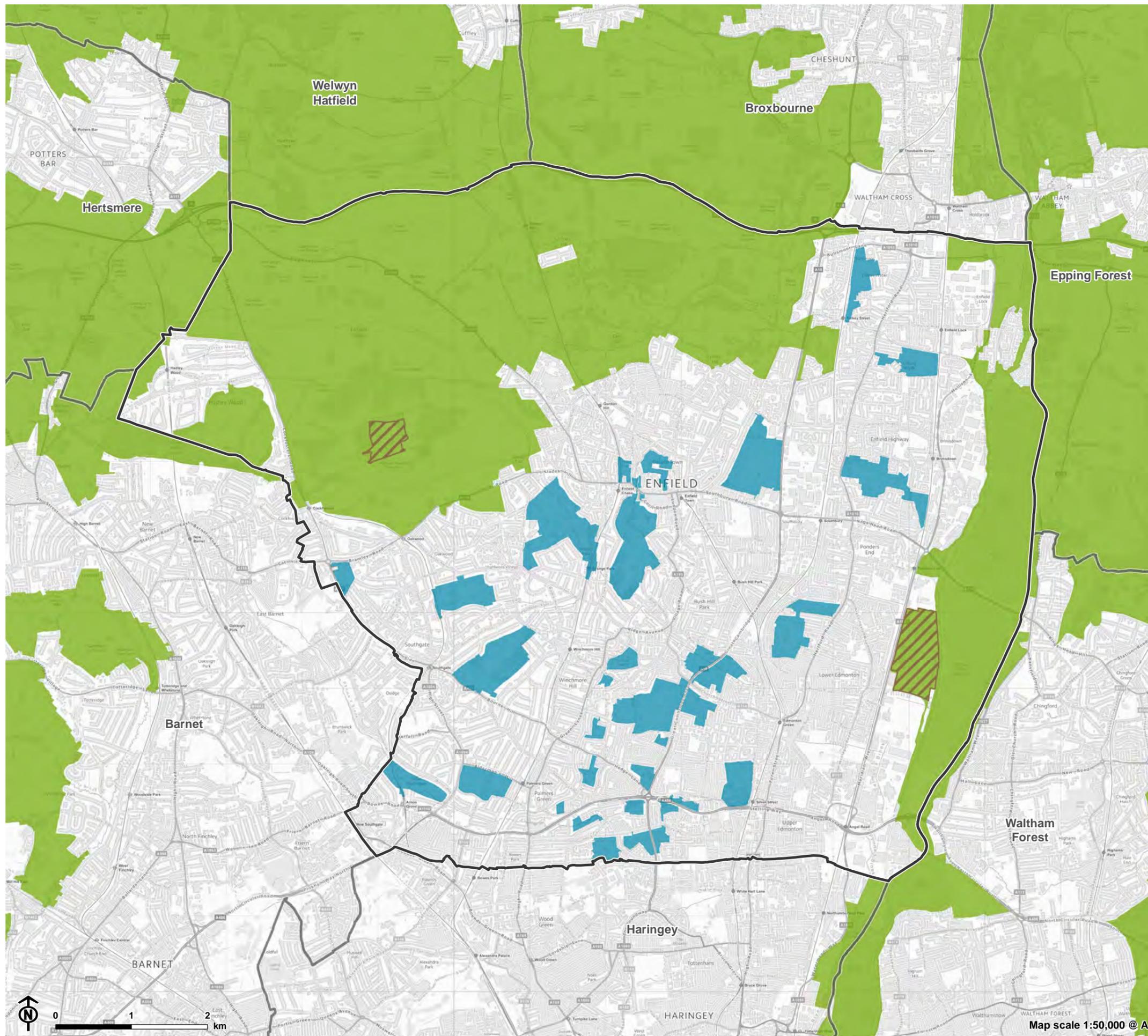
- Salmon Brook Link – starts in the Green Belt, running through farmland before passing through residential areas and golf courses. It then connects to Bury Lodge Park and onward through cemeteries and playing fields in Edmonton to the green spaces of the Lee Valley Park at Pickett's Lock. In this last section the Brook is only visible in these pockets of green space;
- Turkey Brook Link – follows the London Loop from the Lee Valley Walk at the Prince of Wales Open Space via Albany Park and through built areas connecting to Forty Hall Country Park, Hillyfields Park and Whitewebbs Park in the Green Belt;
- The Enfield Link – follows the New River course through Bush Hill Park golf course and the Town Park, connecting with the town centre. The route follows the river as it loops around the town and playing fields. The Link then moves north through largely residential areas and connects with the Green Belt at Myddelton House and Gardens and Capel Manor College;
- The Whitewebbs Link – forms a route through the Green Belt from Hillyfields Park on the urban fringe through Whitewebbs Country Park and beyond; and
- Pymmes Brook Link – runs near the edge of the borough and follows a small tributary from Picketts Local on the River Lee out to Monken Hadley Common in the Green Belt. The Pymmes Brook Trail links with the London Loop in the north and the Lee Valley Walk in the south, passing through a number of parks.

**3.60** The borough policy map also highlights a number of 'Green Chain Missing Links' for example where the Enfield Link loops around Enfield Town Park, and across the weir at Forty Hill.

**3.61** Green Infrastructure in the borough as well as Nature Conservation Designations are shown on **Figures 3.6** and **3.7**.



Figure 3.1: Green Belt and Metropolitan Open Land



-  Enfield Borough boundary
-  Neighbouring Local Authority boundary
-  Green Belt
-  Metropolitan Open Land
-  Major developed sites in the Green Belt





Figure 3.2: Topography, water and transport

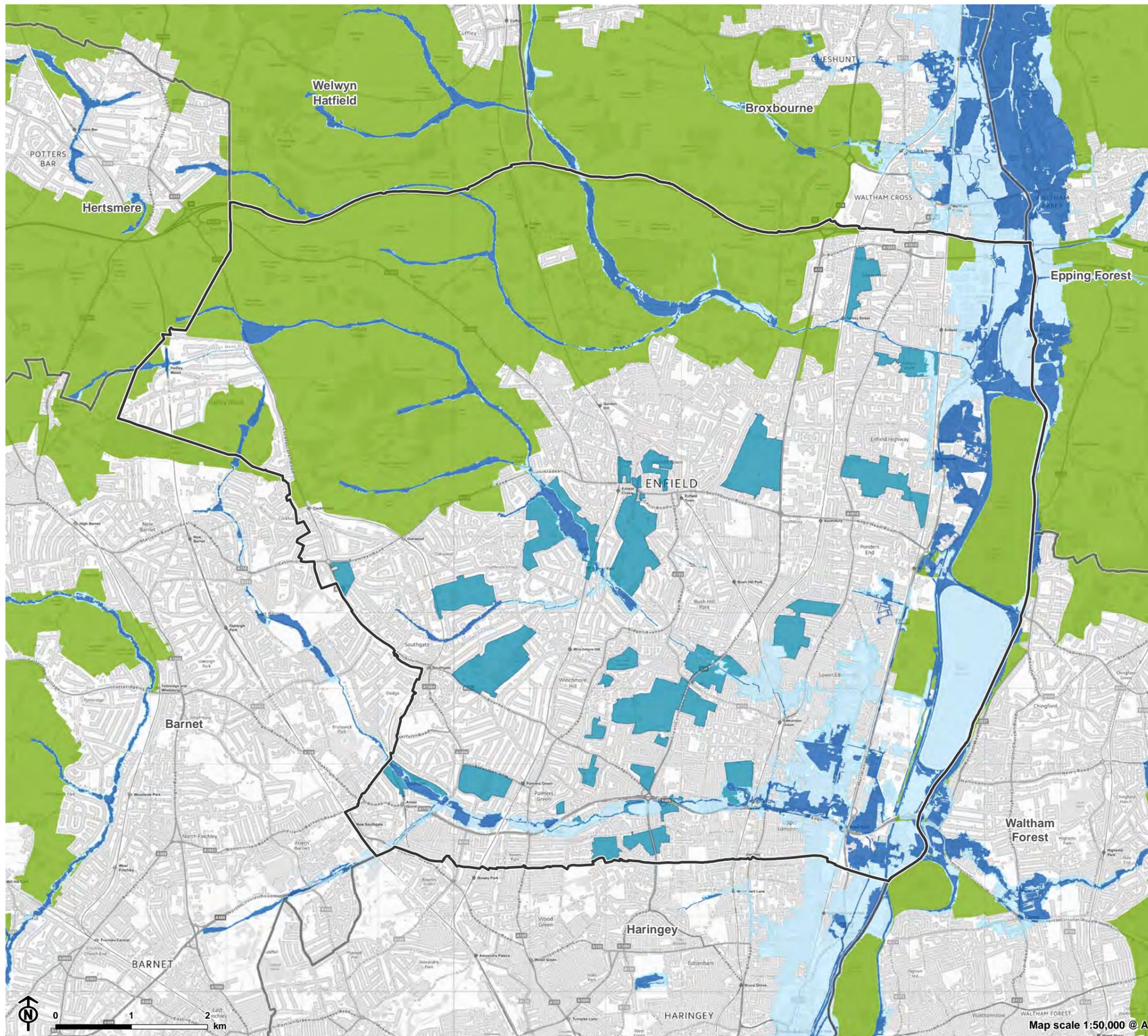


- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Watercourse / waterbody
- Motorway
- A Road
- Contours (10m)
- Railway





Figure 3.3: Flood risk



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Flood Zone 3
- Flood Zone 2

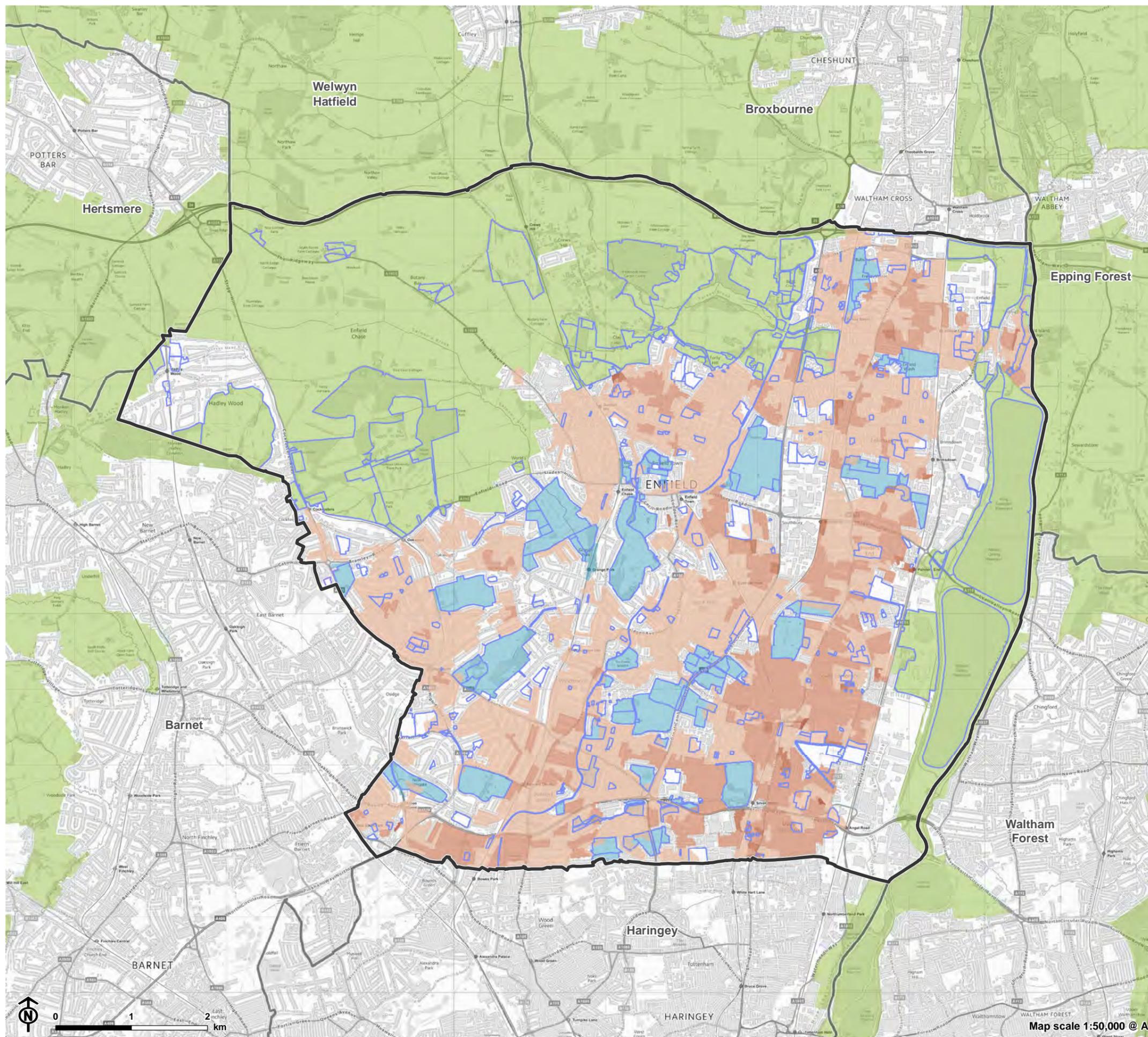


Map scale 1:50,000 @ A3





Figure 3.4: Population density and open space



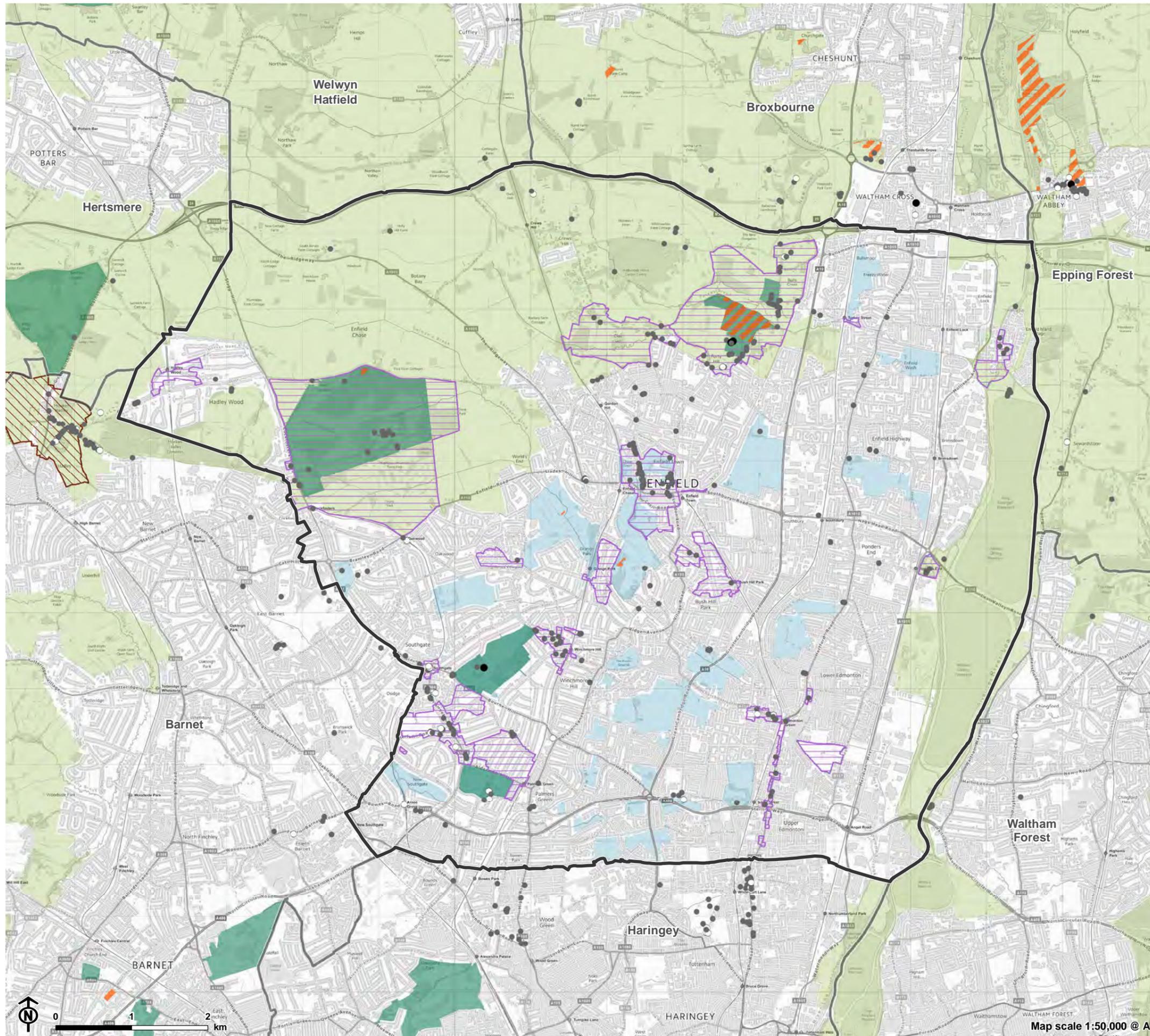
- Enfield Borough boundary
  - Neighbouring Local Authority boundary
  - Green Belt
  - Metropolitan Open Land
  - Local open space
- Population / Hectares**
- 50 - 100
  - 100 - 200
  - 200 - 500
  - > 500

Map scale 1:50,000 @ A3





Figure 3.5: Historic environment



- Registered battlefield
- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Listed building**
- Grade**
- I
- II\*
- II
- Conservation area
- Scheduled monument
- Registered park and garden
- Registered battlefield

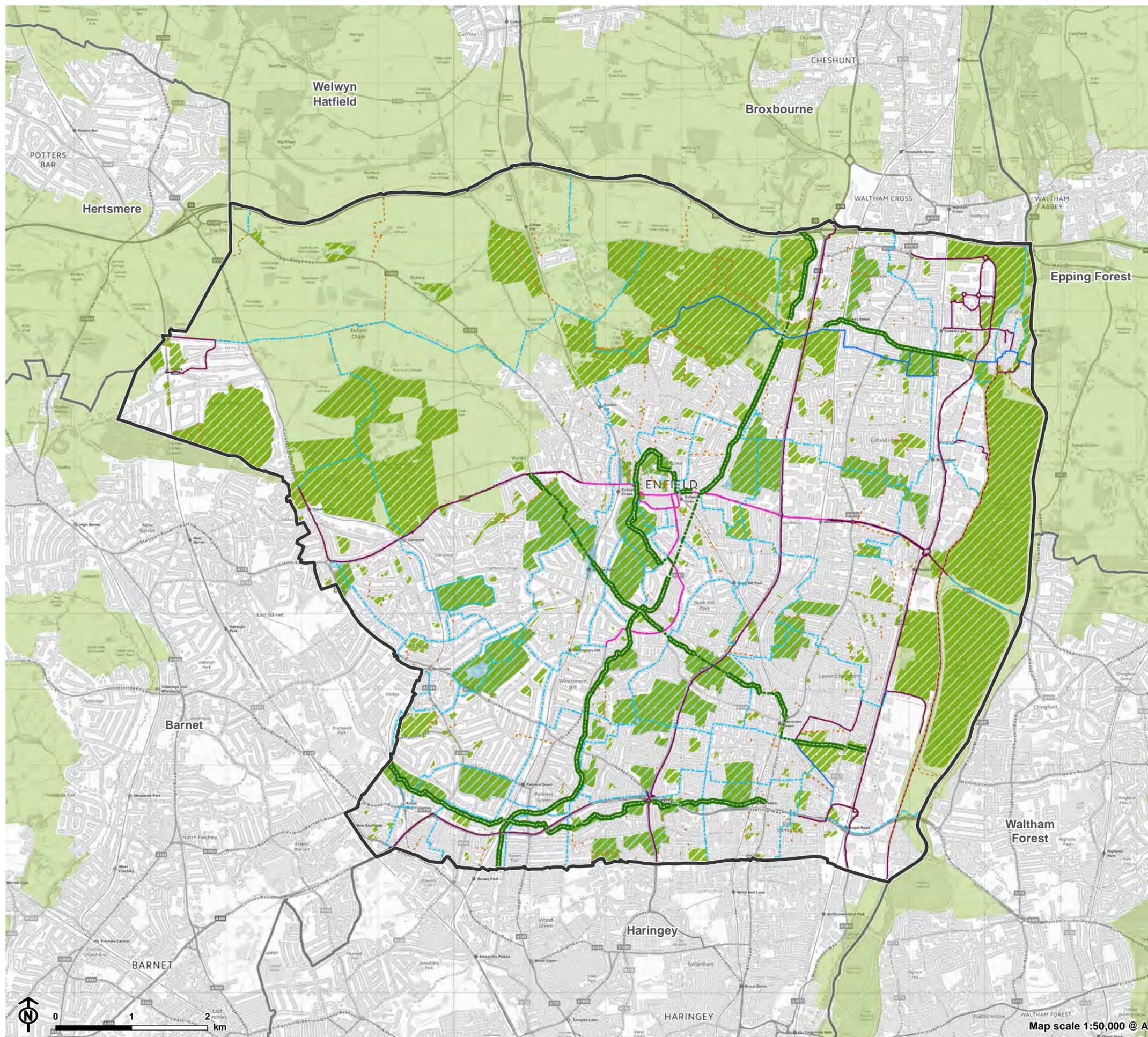


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Figure 3.6: Green infrastructure

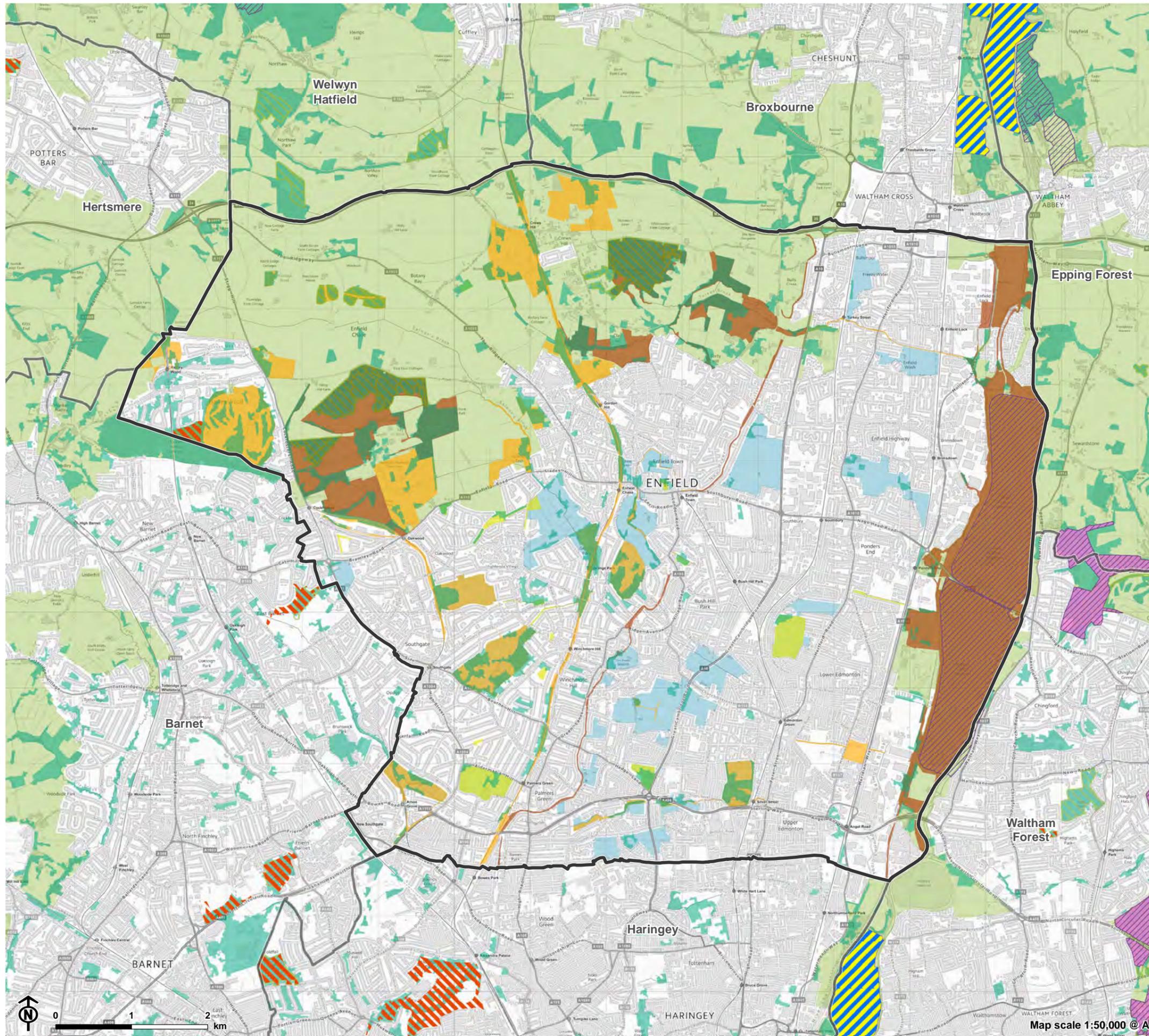


- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Local open space
- Green chain corridor
- Green chain missing link
- Future cycle routes
- Future greenway routes
- Footpaths
- Cycle routes
- Greenway routes





Figure 3.7: Nature conservation



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Local Nature Reserve (LNR)
- Ramsar
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- Metropolitan
- Borough
- Local
- National forest inventory
- Ancient woodland inventory



# Chapter 4

## Green Belt Assessment Methodology

**4.1** This chapter sets out the methodology used to assess the variations in contribution to the Green Belt purposes, as well as harm that would result from the release of Green Belt land in the borough.

**4.2** **Chapter 2** provides the policy context for the study. This has informed the assessment criteria and the definitions of key terms used in the Green Belt assessment set out below.

**4.3** The assessment methodology is based on the NPPF's two essential characteristics to Green Belts – openness and permanence – and five Green Belt purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**4.4** To undertake an area-based assessment of Green Belt contribution to these essential characteristics and purposes it is necessary to establish which settlements represent large built-up area(s), neighbouring towns and historic towns. Alongside more general definitions of the essential characteristics of Green Belt – openness and permanence – these key settlement terms are defined in the context of Enfield later in the chapter.

**4.5** Ratings and supporting analysis have been provided to show the contribution land makes to each Green Belt purpose and the impact on the integrity of the neighbouring land as a result its release from the Green Belt. These two considerations are combined to give overall harm ratings. Parcel and sub-parcels are defined to show the variations in harm. These are provided in map form.

**4.6** Throughout the methodology, green boxes are included to clarify the method undertaken or highlight evidence, such as policy, guidance and case law, which supports the method of approach.

## Extent of assessment area

### General extent

**4.7** The focus of this study is to assess the harm to the Green Belt purposes of expanding existing settlements outward from the existing inset urban edges. To achieve this, the harm of release has been assessed outward from the following settlements inset from the Green Belt:

- All inset land contiguous with the Greater London conurbation, including Hadley Wood; and
- Crews Hill.

### Assessment approach

**4.8** Assessment areas around each settlement have not been predefined but have been determined by applying a process that, working out from each inset settlement edge, assesses and parcels land out to a point beyond which development would result in a *high* level of harm to Green Belt purposes. Analysis is provided to support the high harm judgements for areas beyond this point.

**4.9** Harm will typically increase with distance from settlement edges, as the release of larger areas clearly has more potential to weaken the integrity of the Green Belt by extending into areas that have a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside.

**4.10** Green Belt locations identified in the borough's recent Call for Sites carried out for the purposes of the separate Enfield Capacity Study have not been directly assessed in this study, which is a comprehensive study of all Green Belt in the borough. However, overlapping reasonable site options with the variations in harm identified in this study will provide a high-level indication of the likely harm of releasing site options in isolation. The assessment of sites is given further consideration in the 'next steps' section.

**4.11** The assessment assumes that all land within the urban area and settlements inset from the Green Belt, unless constrained, is 'developed' and is therefore not 'open'. This means it potentially has a containing impact on the adjacent Green Belt. Likewise, the assessment assumes that any land released from the Green Belt would, unless constrained, be 'developed' and would not retain any 'openness'.

### Consideration of development sites

The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted the need for assessing a wider area than just the promoted development sites. The Inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites, and did not examine all potentially suitable areas. – Examination Document Reference [EX39](#) .

### Exclusions

**4.12** Beyond a general consideration of the strategic contribution all Green Belt land makes to the Green Belt purposes, land covered by an 'absolute' constraint to development – i.e. areas within which development would not be permitted – will be excluded from the assessment process. Absolute constraints include the following:

- Special Areas of Conservation;
- Special Protection Areas;
- Ramsar sites;
- Sites of Special Scientific Interest;
- Ancient woodland;
- Scheduled Monuments;
- Registered Parks and Gardens;
- Common Land; and
- Cemeteries.

**4.13** Given the prevalence of Sites of Importance for Nature Conservation, listed buildings, and Conservation Areas across the study area and Flood Zone 3 in the Lee Valley, these designations have not been excluded from the assessment of harm, just acknowledged as potential constraints.<sup>31</sup>

**4.14** Land within the Green Belt that is subject to the identified environmental constraints in the list above has not been assessed in detail.

**4.15** It is important to note that, although these constrained areas have not been assessed for harm in themselves, they can perform as areas of open land and/or as boundary features – which can have a bearing on the assessment of

<sup>31</sup> Given the relevance of these constraints to the contribution of MOL to MOL Criterion 3 these designations have not been considered absolute constraints in the assessment of MOL. Further details are provided in the Chapter below.

harm that would be caused from the release of adjacent unconstrained Green Belt land.

**Exclusion of constrained land**

The Inspector’s Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) noted that there is no need to assess land that is unlikely to ever be developed:

*“There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites, however they are defined.”* – Examination Document Reference [EX39](#).

**Harm assessment: steps**

**4.16** The assessment process is split into 6 steps, as shown in **Figure 4.1**.

**4.17** The assessment of contribution to Green Belt purposes (Step 3) is the product of the analysis of two distinct elements: consideration of the extent to which each of the Green Belt purposes is applicable in any given area (Step 1); and consideration of the more localised variations in contribution that result from variations in the relationship between inset settlements and the Green Belt (Step 2).

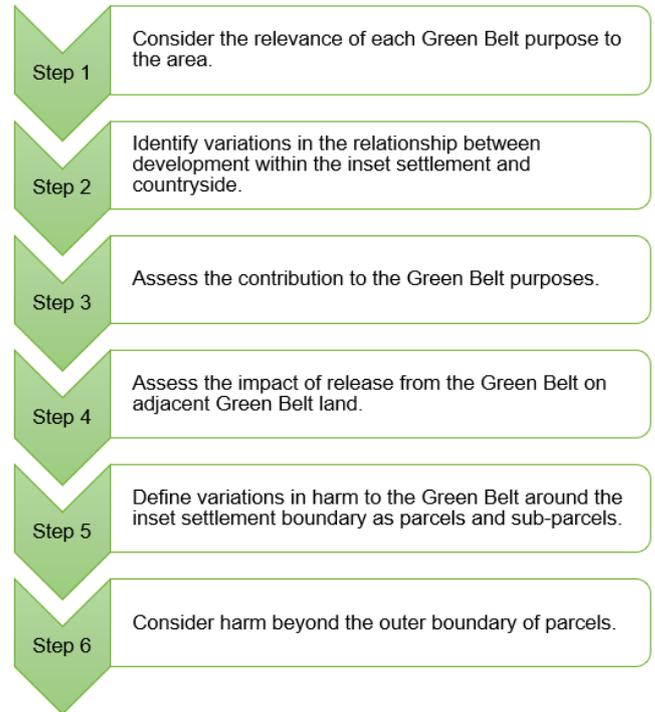
**4.18** Step 4 rates the potential impact of the release of land (with the assumption that it will lose openness) on the adjacent Green Belt.

**4.19** Step 5 combines the judgements from Steps 3 and 4 to arrive at conclusions regarding variations in harm, with parcel or sub-parcel areas being defined to reflect these variations.

**4.20** Unless harm for a parcel has been assessed as *high*, Step 6 repeats the assessment process to consider harm beyond its outer edge. This results either in the definition of a further parcel – where an area in which harm would be less than *high* can be defined – or text provided to support the judgement that any expansion beyond the parcel edge would result in *high* harm.

**4.21** Each step is explained in further detail below.

Figure 4.1 Harm assessment steps



**Step 1: Relevance of each Green Belt purpose**

**4.22** The first step of the assessment process is to identify if the Green Belt land within the assessment areas surrounding each inset settlement has the potential to contribute to any of these purposes based on the location of the land.

**4.23** As noted previously, there is no nationally defined approach to how Green Belt studies should be undertaken. However, case law highlights the importance of assessment against the Green Belt purposes within Green Belt assessments.

**4.24** To recap the previously stated five Green Belt purposes as defined in paragraph 134 of the NPPF, these are:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

### Consideration of Green Belt purposes

The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation. – [Interim Report](#).

The Inspector's Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear "how the assessment of 'importance to Green Belt' has been derived" from assessments against the individual purposes of the Green Belt and highlighted the importance of revisions to Green Belt boundaries to "take account of the need to promote sustainable patterns of development, as required by Paragraph 85 [2012 NPPF, paragraph 139 of the 2019 NPPF] [even if] such an exercise would be carried out through the SEA/SA process." – Examination Letter Reference: [CCC/SCDC/Insp/Prelim](#).

### Does the land have the potential to play a role with regards to purpose 1 – to check the unrestricted sprawl of large built-up areas?

**4.25** It is possible to argue that all land within the Green Belt prevents the unrestricted sprawl of large built-up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.

**4.26** For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to Enfield, and what is meant by the term 'sprawl'.

### Definition of the large built-up area

There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined to considering all inset settlement to be large built-up areas.

The Green Belt in Enfield forms part of the Metropolitan Green Belt surrounding Greater London, designated to control the sprawl of the London conurbation. Therefore, inset land contiguous with the London conurbation is considered to form part of the large built-up area.

**4.27** Whilst definitions of 'sprawl' vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the impact of releasing land in the context of a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role an area of land plays is dependent on its relationship with a large built-up area.

**4.28** Land that, if developed, would clearly constitute an extension of a large built-up area makes the strongest contribution to preventing its sprawl. However, it is recognised that a smaller inset settlement area close to a large built-up area can have a relationship with it such that expansion of the latter, particularly if it narrows the gap between the two, can also be considered detrimental to this purpose.

### Definition of sprawl

The PAS guidance emphasises in relation to Purpose 1 the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. – [PAS Planning on the Doorstep](#).

The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl, noting "a variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development." – [RTPI Research Briefing No. 9](#).

### Assessing relevance of Green Belt purpose 1

Green Belt land has potential to play a stronger role with regards to Purpose 1 if:

- Land is close to the large built-up area.

Green Belt land can play a role with regards to Purpose 1 if:

- Land is not close enough to the large built-up area for land to be associated with it.

### Does the land have the potential to play a role with regards to purpose 2 – to prevent neighbouring towns merging into one another?

**4.29** The concept of what constitutes a 'town' has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.

**4.30** Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in

turn have a significant impact on the overall separation between larger 'towns'.

**4.31** The concept of 'merging' is clearer but assessing the extent to which land between towns contributes to preventing this is less so. However, it is generally acknowledged that the role open land plays in preventing the merging of towns is more than a product of the size of the gap between them. Assessments therefore usually consider both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.

**4.32** Both built and natural landscape elements can act to either decrease or increase perceived separation. For example, intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.

**4.33** This study identifies that land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – i.e. the more fragile the gap, the stronger the potential contribution to this purpose of any intervening open land. Physical proximity is the initial consideration; however, where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. that the characteristics of the open land relate more to the towns' areas themselves than to the open land in between. Where this is the case, the impact of release of land for development on Purpose 2 may be reduced.

**4.34** There is no separate assessment of gaps between settlements that are not considered to be towns, although the role of smaller areas of urbanising development in reducing perceived rural separation between towns is considered.

**4.35** This includes Crews Hill, Clay Hill and Hadley Wood, which are too small to be considered 'towns' in their own right.

**4.36** Although there is a narrow physical connection between Hadley Wood and the main metropolitan area, it is relatively small and thus Hadley Wood can be perceived as a separate settlement with its own setting. This makes land to the south of Hadley Wood, notably Covert Way Nature Reserve, the wooded Monken Hadley Common and to a lesser extent the adjacent Hadley Wood Golf Course, important in preventing coalescence.

**4.37** Gaps between suburbs within the urban edge have also been considered to contribute to this purpose if they are found to preserve distinctions in the character of different areas,

notably the strategic gap created by the Lee Valley Regional Park.

**4.38** All towns within the London Borough of Enfield form part of the London conurbation; there are no towns within the borough which do not already form part of the conurbation. There are, however, distinct settlements ('towns') within neighbouring Hertsmere and Epping Forest which lie in close proximity to Enfield's portion of the large built-up area of London. Hertsmere Borough Council's adopted Core Strategy<sup>32</sup> names Borehamwood, Potters Bar and Bushey as the three most significant settlements within the borough's settlements hierarchy. Hertsmere Borough's Green Belt Assessment<sup>33</sup> defined the following settlements in Hertsmere as being relevant to Purpose 2:

- Borehamwood;
- Bushey / Bushey Village;
- Elstree village;
- North Bushey;
- Potters Bar ;
- Radlett; and
- Shenley.

**4.39** Only **Potters Bar** is considered to be in close enough proximity to the Green Belt within the London Borough of Enfield to be considered as a town for the purposes of this Green Belt assessment.

**4.40** Epping Forest District's Green Belt Assessment<sup>34</sup> defined the following settlements in Epping Forest as being relevant to Purpose 2:

- Epping;
- Waltham Abbey;
- Loughton / Debden;
- Chigwell;
- Buckhurst Hill;
- Chipping Ongar;
- North Weald Bassett;
- Theydon Bois;
- Roydon; and
- Lower Nazeing.

**4.41** Only **Waltham Abbey** is in close enough proximity to the Green Belt within the London Borough of Enfield to be

<sup>32</sup> Hertsmere Core Strategy Development Planning Document, Hertsmere Borough Council, 2013

<sup>33</sup> Hertsmere Green Belt Assessment, Arup, 2017

<sup>34</sup> Epping Forest District Green Belt Assessment: Stage 2, LUC, August 2016

considered as a town for the purposes of this Green Belt assessment.

### Definition of ‘towns’

Having reviewed the neighbouring Green Belt assessments from Hertsmere and Epping Forest, only Waltham Abbey and Potters Bar are considered to be close enough to the Green Belt in Enfield to constitute ‘towns’ for the purposes of this study, in addition to the Greater London conurbation.

### Physical and visual role of preventing merging

PAS guidance, which is commonly referenced in Green Belt studies, states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities. – [PAS Planning on the Doorstep](#).

### Assessing relevance of Green Belt purpose 2

Green Belt land has the potential to play a very strong role with regards to Purpose 2 – i.e. gap is very fragile – if:

- Land lies in a very narrow gap between distinct towns;

Green Belt land has the potential to play a stronger role with regards to Purpose 2 – i.e. gap is *fragile* – if:

- Land lies in a narrow gap between distinct towns; and/or
- Land lies in a moderate gap between towns, but with no significant separation; and/or
- Land lies in a moderate gap between towns, but urbanising development between the two reduces perceived separation.

Green Belt land has the potential to play some role with regards to Purpose 2 – i.e. gap is *moderate* – if:

- Land lies in a moderate gap between towns, with some significant separation; and/or
- Land lies in a narrow gap between towns, but they are already linked to a significant degree; and/or
- Land lies in a wide gap between towns, but urbanising development between the two reduces perceived separation; and/or
- Land is peripheral to a narrow gap between towns.

Green Belt land has less potential to play a role with regards to Purpose 2 – i.e. gap is *robust* – if:

- Land lies in a wide gap between towns, with some significant separation; and/or
- Land is peripheral to a moderate gap between towns.

Green Belt land does *not* play a role with regards to Purpose 2 if:

- Land does not lie between neighbouring towns.

### Does the land have the potential to play a role with regards to purpose 3 – to assist in safeguarding the countryside from encroachment?

**4.42** This considers the extent to which land constitutes ‘countryside’ on the basis of the normal usage of the term, as opposed to land partially or wholly reflecting urban influence. It does not consider the impact of development which reduces openness (in Green Belt terms) or of development which has a containing influence, as these are addressed in the analysis at Step 2.

**4.43** Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered ‘countryside’ to the same degree as other open land.

**4.44** Equally, some land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character. Also, contribution to Purpose 3 does not necessarily equate to extent of built development, as development that is rural in form may often not be considered to detract from countryside character.

**4.45** It is important for the purposes of the assessment not to stray into assessing landscape character, sensitivity or value; whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not be taken into consideration: any Green Belt land found to be in poor condition may nevertheless perform well in its fundamental role of preventing urban sprawl by keeping land permanently open.

### Widely applicable purpose

PAS guidance presumes that all Green Belt contributes to the purpose of preventing encroachment into the countryside to some degree, but suggests that:

*“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”*

PAS guidance also highlights that the quality of the landscape of an area should not be a consideration when assessing the contribution of Green Belt to the fulfilment of Green Belt purposes, including Purpose 3. This could be a planning consideration in its own right

when seeking a suitable location for development. – [PAS Planning on the Doorstep](#)

#### Assessing the relevance of Green Belt purpose 3

Green Belt land has the potential to play a stronger role with regards to Purpose 3 if:

- Land use is not associated with the urban area.

Green Belt land has potential to play some role with regards to Purpose 3 if:

- Land is characterised by a use which, although it may be 'appropriate' within the Green Belt (see Step 2), is more strongly associated with the urban area – e.g. school playing fields, recreation grounds.

Green Belt land does not play a role with regards to Purpose 3 if:

- Land is entirely contained within the urban area, and too small to be considered to constitute countryside in its own right.

#### Does the land have the potential to play a role with regards to purpose 4 – to preserve the setting and special character of historic towns?

**4.46** This purpose makes specific reference to 'historic towns', not to individual historical assets or smaller settlements such as villages and hamlets. The London Borough of Enfield's Characterisation Study<sup>35</sup> notes that Enfield originated as a series of smaller settlements in the countryside that surrounded London, all of which grew and merged to become a polycentric part of the of Greater London conurbation. Collectively, they contribute to London's historic character but, having merged with and been inset within that city's metropolitan urban area, what remains of their relationship with the open countryside designated as Green Belt is no longer physical, and any visual connection has been significantly reduced.

#### Guidance on Green Belts and historic towns

An extract from Hansard in 1988 clarifies which historic settlements in England were considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge<sup>36</sup>. Durham has since been added to this list. – Examination Document Reference [1048107](#).

This is supported by the PAS guidance which states: that "This purpose is generally accepted as relating to very few settlements in practice." – [PAS Planning on the Doorstep](#).

It is noted that, the Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted that with regards to Purpose 4 the study assessed smaller settlements which "*could be criticised as being too detailed for a Green Belt assessment*" but was "*not necessarily inappropriate or irrelevant*". – Examination document references [PS A017b](#) and [RE A021](#).

**4.47** Responding to the consultation on the method statement Historic England have advised:

*"The Hansard extract on this subject...states that this purpose is 'especially relevant' to the six historic towns listed – but this does not mean it is exclusive to those six...While we would consider that ultimately it is for the relevant local planning authority to determine which historic towns in their Green Belt any review should consider, in the context of the built form and historic environment in Enfield's Green Belt we agree with the proposed approach to consider London as a historic town."*

**4.48** Consequently, the study draws on the borough's historic environment evidence base to determine where the borough's Green Belt contributes to the setting and special character of historic London.

**4.49** The historic character and evolution of development in the Green Belt to the north of Enfield's metropolitan urban area has been influenced by the use of the countryside as a retreat from London for the upper and middle classes, first as the Enfield Chase hunting forest, followed by the formal historic estates of Trent Park, Forty Hall, Capel Manor and Whitewebbs, and then in the villas that characterise Clay Hill, Forty Hill and Bulls Cross. The preservation of these designated areas as locations beyond the city edge are important to the setting and special character of historic London.

**4.50** The connection between a historic town's historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

**4.51** Consideration has been given to the setting of individual heritage assets – buildings, monuments, conservation areas

<sup>35</sup> Enfield Characterisation Study, Urban Practitioners, February 2011. Found at: <https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf>

<sup>36</sup> Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

and parks and gardens – where such assets make a clear contribution to the character and legibility of historic London, i.e. they are of metropolitan importance.

**4.52** The listings of all designated historic assets within and in close proximity to Enfield's Green Belt have been reviewed, as well as the historic assets in the Enfield Local Heritage List referenced by Historic England (see **Appendix A**) to establish which historic assets are a) of metropolitan significance and b) have a physical and/or visual relationship with Enfield's Green Belt land. Drawing on the review of the borough's historic environment evidence summarised in **Chapter 3** above, only the Green Belt land within and in key views out from the Registered Parks and Gardens and the Conservation Areas of Trent Park, Clay Hill, Enfield Lock and Ponders End and Hadley Wood are considered to have physical and/or visual relationships with Enfield's Green Belt.<sup>37</sup>

**4.53** Consequently, all Green Belt land within these Conservation Areas (including Registered Park and Garden land), and contributing to their recorded key views, will be recognised as making a **strong contribution** to Purpose 4.

**Does the land have the potential to play a role with regards to purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?**

**4.54** Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release of one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

#### Equal contribution of Green Belt to purpose 5

The PAS guidance states:

*"...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose"*

In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. – [PAS Planning on the Doorstep](#).

The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 "*this purpose applies to most land*" but that "*it does not form a particularly useful means of evaluating sites*" – File reference: [PINS/W5780/429/10](#)

However, the examination reports of some planning inspectors, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.

**4.55** Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – in the case of Enfield, these assessments are the Capacity Study, the Employment Land Review and the Industrial Intensification assessment. Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement. The London Borough of Enfield's latest Brownfield Land Register has been used to calculate the area of brownfield land within the urbanised<sup>38</sup> area of the borough.

**4.56** Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements than it is for land around different isolated settlements, each with their own brownfield land areas.

**4.57** Given the nature of the settlement pattern within Enfield, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. In order that the study appropriately assesses Purpose 5 and affords it equal weighting with Purposes 1-4, therefore, an even level of contribution to Purpose 5 has been determined for all areas of Green Belt based on the average availability of brownfield land across the borough.

<sup>37</sup> Registered Parks and Gardens are recognised as absolute constraints and will therefore be excluded from the assessment of Green Belt harm in line with the good practice guidance outlined above.

<sup>38</sup> The urbanised area constitutes land within the borough which does not fall within the Green Belt.

**4.58** Without a clear range of brownfield land proportions for each settlement across the study area, it is not possible to calculate a tailored set of percentage ranges from which to judge contribution to Purpose 5. There is also no guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or weaker, role in encouraging urban regeneration.

**4.59** The London Borough of Enfield Brownfield Register<sup>39</sup> contains a record of roughly 49.82ha of brownfield land within the borough. Roughly 29.5ha of the registered brownfield land falls within the Green Belt, leaving roughly 20.32ha within the urbanised area of the borough. Therefore, the borough's Green Belt has and continues to play a significant role in encouraging the recycling of derelict and other urban land in the urban area before brownfield land in the Green Belt. Consequently, all Green Belt land within the borough is considered to make a **Strong** contribution to Purpose 5.

## Step 2: Green Belt relationship with development

**4.60** Having considered in general terms the variations in the relevance of each of the Green Belt purposes around an inset settlement, the next step in the assessment process is to identify more localised variations in the relationship between Green Belt land and development with an urbanising influence. Land that is related more strongly to urbanising development typically makes a weaker contribution to all of the Green Belt purposes, being less likely to be perceived as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2) or encroachment (Purpose 3).

**4.61** 'Urbanising development' is defined as development which, with reference to the lists provided in paragraphs 145 and 146 of the NPPF, is considered 'inappropriate' and therefore has an 'encroaching' effect on Green Belt land.

### Appropriate development

Appropriate development within the Green Belt cannot, according to case law<sup>[1]</sup>, be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this study therefore, development deemed to be 'appropriate' within the Green Belt (as defined in the closed lists within paragraphs 145 and 146 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully

considered, as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Caution is therefore exercised in the application of what is defined as an appropriate use. It is not possible within a strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut. For example, buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve openness, or conflict with Green Belt purposes in this regard. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view is taken on the extent to which the proposed land use has affected Green Belt purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside. This is of relevance to the assessment approach for all of the Green Belt purposes.

The NPPF's Green Belt policies are supplemented by additional planning practice guidance that sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.<sup>40</sup>

**4.62** Assessing the impact of releasing Green Belt land requires an assumption that the released land would result in a loss of openness, unless the development of such land is constrained by other factors or designations. The significance of the loss is relative to the existing openness of the Green Belt land.

<sup>39</sup> London Borough of Enfield Brownfield Register, London Borough of Enfield, 2020

<sup>[1]</sup> This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

<sup>40</sup> National Planning Practice Guidance  
<https://www.gov.uk/government/collections/planning-practice-guidance>

**4.63** The relationship between land within the Green Belt and developed land inset within it is considered in terms of Green Belt land's distinction from the inset urban edge. Openness and landform/landcover are common factors that affect all of the Green Belt purposes, and their consideration allows for a finer grain of assessment which cannot be achieved through consideration of the broader applicability of the purposes alone (Step 2). These factors are discussed in the paragraphs below.

#### Finer grain of study

The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance, and that "a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt". – Examination Document Reference [EX38](#).

#### Openness: to what extent is the land free from 'urbanising development'?

**4.64** The NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. The presence of 'urbanising development' within the Green Belt can increase the relationship between Green Belt and an inset settlement and thus diminish the contribution of land to the Green Belt purposes.

**4.65** Green Belt openness relates to lack of 'inappropriate development' rather than to visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Visual openness is, however, still relevant when considering the degree of distinction between an urban area and the wider countryside.

**4.66** The assessment of openness first considers the appropriateness of development. Where development is not 'appropriate', it then considers the extent, scale, form and density of development, in order to make a judgement on the degree of openness.

**4.67** At a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development have a negligible impact in this respect, and are not therefore defined and assessed as separate parcels of land.

#### Absence of urban influence and visual impact

As noted by the Inspector at the Welwyn Hatfield Borough Council Local Plan Examination (2017), openness is not concerned with the character of the landscape, but instead relates to the "absence of built development and other dominant urban influences". – Examination Document Reference [EX38](#).

Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:

*"Openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.*

*The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness. The preservation of 'the setting ... of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."*  
– Neutral Citation Number: [\[2016\] EWCA Civ 466](#).

#### Openness

The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included, at paragraph 20, reference to openness in relation to appropriate development:

*"Implicit in the policy in paragraph 89 of the NPPF is a recognition that agriculture and forestry can only be carried on, and buildings for those activities will have to be constructed, in the countryside, including countryside in the Green Belt. Of course, as a matter of fact, the construction of such buildings in the Green Belt will reduce the amount of Green Belt land without built development upon it. But under NPPF policy, the physical presence of such buildings in the Green Belt is not, in itself, regarded as harmful to the openness of the Green Belt or to the purposes of including land in the Green Belt. This is not a matter of planning judgment. It is simply a matter of policy. Where the development proposed is an agricultural building, neither its status as*

*appropriate development nor the deemed absence of harm to the openness of the Green Belt and to the purposes of including land in the Green Belt depends on the judgment of the decision-maker. Both are inherent in the policy.” – Neutral Citation Number: [2016] EWCA Civ 404*

Samuel Smith Old Brewery (Tadcaster) and Oxtan Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although paragraph 90 of the 2012 NPPF states that “mineral extraction” is not “inappropriate development” in the Green Belt, it was found that the Council failed to take into account visual impacts when considering whether the proposal would “preserve the openness of the Green Belt” as required in paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council’s own assessment of the likely effects of the development on the landscape, visual impact on openness was “quite obviously” relevant to its effect on the openness of the Green Belt. This judgement was subsequently overturned in the Supreme Court (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3. Contrary to Samuel Smith Old Brewery (Tadcaster) and Oxtan Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), where visual impact was found not to be an obligatory consideration when assessing Green Belt. It was found that in “a proper reading of the NPPF in its proper historic context, visual quality of landscape is not in itself an essential part of openness for which the Green Belt is protected.” “The concept of “openness” in paragraph 90 of the NPPF is a broad policy concept which is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. Openness is not necessarily a statement about the visual qualities of the land, nor does it imply freedom from all forms of development.”

**Permanence**

The National Planning Policy Framework paragraph 113 defines both Green Belt ‘openness’ and their ‘permanence’ as the essential characteristics of Green Belts. The permanence of boundaries in terms of their durability through the lifespan of Local Plan is important

as a planning concept but, when reviewing Green Belt boundaries, does not inform the assessment process.

**Examples of land which lacks urbanising influences, and is therefore considered to be open in Green Belt terms:**

- Any land without built form;
- Agricultural/horticultural/forestry buildings (e.g. farms, glasshouses);
- Mineral extraction or engineering operations that preserve Green Belt openness and do not conflict with the purposes of including land within it; and
- Low density or small-scale rural settlement.

**Examples of urbanising development which could potentially reduce Green Belt openness:**

- Buildings other than those for agriculture/horticulture/forestry; and/or
- Solar farms; and/or
- Car parks.

**Distinction: to what extent do the physical features and characteristics of the Green Belt create a distinction between inset land and the Green Belt?**

**4.68** The process of assessing distinction has been carried out along each inset urban area. It has also been applied to any ‘washed-over<sup>41</sup>’ settlements that are considered, through the Step 2 analysis, to comprise development that diminishes Green Belt openness.

**4.69** The analysis is applied as a progression out from the inset edge, recognising that with distance from these edges the level of distinction only increases, rather than diminishing. The analysis has therefore only been carried out up to a line beyond which distinction from the urban area is judged to be *strong* (unless distinction does not reach this level before another inset settlement, or the outer Green Belt edge, is reached).

**4.70** The distinction between land within the Green Belt and developed land considers five interrelated elements, which are considered in the following paragraphs. These are:

- Boundary features;
- Landform and land cover;
- Views;
- Distance; and
- Urbanising influence.

<sup>41</sup> ‘Washed over’ means land, including development, that is in the Green Belt, not inset within or on the edge of it.

**4.71** Consideration of these elements is combined, using professional judgement, to give a rating on a 3-point scale (*weak, moderate, strong* distinction). Supporting text indicates the relevance of each of the 5 elements and notes any particular weighting applied.

**How do boundary features create distinction?**

**4.72** Consideration is first given to the nature of any physical boundary features. **Table 4.1** below provides an indication of the strength attributed to different types of boundary. Stronger boundary features are considered to have more permanence.

**4.73** The initial analysis of land adjacent to an urban area considers only the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features increases distinction.

Table 4.1: Strength of boundary features.

Strong boundary	Moderate boundary	Weak boundary
Physical feature significantly restricts access and forms consistent edge	Clear physical feature and relatively consistent edge, but already breached or easily crossed	No significant physical definition – edge may be blurred
For example: Motorway or dual-carriageway; railway;  river/floodplain; sharp change in landform.	For example: Linear tree cover; mature, well-treed hedgerow;  main road; stream; moderate change in landform.	For example:  Regular garden/building boundaries or hedgerows;  Estate/access road; some development crosses boundary.

**Does landform and/or land cover increase distinction?**

**4.74** Landform and land cover may serve as boundary features, as indicated in **Table 4.1**, but this may extend into a broader feature which creates greater distinction, for example a woodland, lake or valley.

**Does visual openness increase distinction?**

**4.75** This question is not concerned with the scenic quality of views, but the extent to which an absence of visual association with urban areas may increase association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.

**4.76** Caution is used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact.

**4.77** As noted previously, the absence of visual openness does not diminish openness in Green Belt terms; however, it is accepted that there is a visual dimension to the perception of openness that can have a bearing on the distinction between urban areas and countryside.

**Does distance from the urban edge add to distinction?**

**4.78** Even in the absence of significant boundary features, distinction from an urban area increases with distance, which is factored into the judgement. Conversely, if boundary features are close together, their combined impact is diminished by lack of distance to separate them.

**Does urban development have a containing influence?**

**4.79** With reference to the variations in openness noted above, we consider whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. Where there is significant containment, development might be considered to constitute ‘infill’ rather than expansion of the urban area.

**Infill development**

Paragraph 145 of the NPPF notes that ‘limited infilling’ is not inappropriate within the Green Belt. – Paragraph 145.

PAS guidance states that development that would effectively be ‘infill’, due to the land’s partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution. – PAS Planning on the Doorstep.

**4.80** Urbanising development can be located within the inset settlement or washed over by the Green Belt. In some cases, land on the fringe of an inset settlement is not currently developed, but unless the development of such land is constrained by other factors or designations (see paragraph 4.12) the assumption is made that it will be developed, and that it therefore cannot be considered ‘open’.

**Step 3: Contribution to Green Belt purposes**

**4.81** Step 3 combines Step 1 (the identification of the potential for Green Belt land to contribute to the Green Belt purposes) and Step 2 (the assessment of relationship of the Green Belt with development) to assess the contribution of Green Belt land to Green Belt purposes 1, 2 and 3.

**4.82** Standard text is used to indicate that contribution to Purpose 5 is consistent across all of the study area.

**4.83** Adjacent to settlements where Purpose 1 is applicable, the assumption is made that the purpose remains relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, diminishes.

**4.84** In between settlements where Purpose 2 is relevant, contribution is likewise reduced at the periphery of the gap.

**4.85** Unlike Purposes 1 and 2, contribution to Purpose 3 does not diminish with distance from urban areas and is consequently recognised to be high for all land beyond these areas that do not have strong distinction from an urban area.

#### What contribution does land make to purposes 1-3?

**4.86** Criteria for each of the five rating levels for purposes 1 - 3 are set out in **Tables 4.2 – 4.4**. These indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements. Supporting text notes where this is the case.

Table 4.2 Criteria used to inform the assessment of contribution to purpose 1

Purpose 1: Check the unrestricted sprawl of large built-up areas	
<b>Significant</b> contribution to purpose	Land is open and close to a large built-up area. It has strong distinction from the inset settlement edge.
<b>Relatively significant</b> contribution to purpose	Land is open and close to a large built-up area. It has moderate distinction from the inset settlement edge; or Land is relatively open and close to a large built-up area. It has strong distinction from the inset settlement edge.
<b>Moderate</b> contribution to purpose	Land is open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is open and relatively close to a large built-up area, but intervening land provides a strong distinction; or Land is relatively open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is relatively developed and close to a large built-up area. It has strong distinction from the inset settlement edge.
<b>Relatively limited</b> contribution to purpose	Land is open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is relatively developed and close to a large built-up area. It has moderate distinction from the inset settlement edge.
<b>Limited or No</b> contribution to purpose	Land is relatively developed and close to a large built-up area. It has moderate distinction from the inset settlement edge; or Land is not open; or Land is not close to a large built-up area.

Table 4.3 Criteria used to inform the assessment of contribution to purpose 2

Purpose 2: Preventing neighbouring towns from merging	
<b>Significant</b> contribution to purpose	<p>Land is open and lies in a very fragile gap between distinct towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is open and lies in a fragile gap between distinct towns. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a very fragile gap between towns. It has strong distinction from the inset settlement edge.</p>
<b>Relatively significant</b> contribution to purpose	<p>Land is open and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a very fragile gap between towns. It has moderate distinction from the inset settlement edge.</p> <p>Land is open and lies in a fragile gap between distinct towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is open and lies in a moderate gap between towns. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a fragile gap between towns. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a very fragile gap between towns. It has strong distinction from the inset settlement edge.</p>
<b>Moderate</b> contribution to purpose	<p>Land is open and lies in a fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is open and lies in a moderate gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a fragile gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a very fragile gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is open and lies in a robust gap between towns. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a moderate gap between towns. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a fragile gap between towns. It has strong distinction from the inset settlement edge.</p>
<b>Relatively limited</b> contribution to purpose	<p>Land is open and lies in a robust gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a fragile gap between towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is open and lies in a robust gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a moderate gap between towns. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a fragile gap between towns. It has moderate distinction from the inset settlement edge.</p>

Purpose 2: Preventing neighbouring towns from merging	
<b>Limited or No</b> contribution to purpose	<p>Land is open and lies in a robust gap between towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively open and lies in a moderate gap between towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively developed and lies in a fragile gap between towns. It has weak distinction from the inset settlement edge; or</p> <p>Land is not open; or</p> <p>Land does not lie between neighbouring towns.</p>

Table 4.4 Criteria used to inform the assessment of contribution to Purpose 3

Purpose 3: Assist in safeguarding the countryside from encroachment	
<b>Significant</b> contribution to purpose	Land is open and land use is not associated with the urban area. It has strong distinction from the inset settlement edge.
<b>Relatively significant</b> contribution to purpose	<p>Land is open and land use is not associated with the urban area. It has moderate distinction from the inset settlement edge; or</p> <p>Land is open but land use is associated with the urban area. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively open and land use is not associated with the urban area. It has strong distinction from the inset settlement edge.</p>
<b>Moderate</b> contribution to purpose	<p>Land is open but land use is associated with the urban area. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively open and land use is not associated with the urban area. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively open but land use is associated with the urban area. It has strong distinction from the inset settlement edge; or</p> <p>Land is relatively developed but land use is not associated with the urban area. It has strong distinction from the inset settlement edge.</p>
<b>Relatively limited</b> contribution to purpose	<p>Land is open but land use is associated with the urban area. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively open and land use is not associated with the urban area. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively open but land use is associated with the urban area. It has moderate distinction from the inset settlement edge; or</p> <p>Land is relatively developed but land use is not associated with the urban area. It has moderate distinction from the inset settlement edge.</p>
<b>Limited or No</b> contribution to purpose	<p>Land is relatively open but land use is associated with the urban area. It has weak distinction from the inset settlement edge; or</p> <p>Land is relatively developed and land use is not associated with the urban area, but it has weak distinction from the inset settlement edge; or</p> <p>Land is entirely contained within the urban area, and too small to be considered to constitute countryside in its own right; or</p> <p>Land is not open.</p>

**What contribution does land make to purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?**

**4.88** As noted under step 2, all Green Belt land is considered to make a **strong** contribution to Purpose 5.

**Step 4: Impact of release on adjacent Green Belt**

**4.89** The natures of any boundary features are considered as part of the assessment of the potential impact on the Green Belt purposes of releasing land from the Green Belt. This determines the extent to which adjacent land incurs loss of integrity – i.e. a weakening of contribution to the Green Belt purposes – through a loss of *distinction* between development and open land.

**4.90** If a revised Green Belt boundary results in a less distinct boundary between the settlement and the countryside, the release of the area of Green Belt under assessment is likely to weaken the land that remains designated as Green Belt. However, even if a strong alternative boundary can be defined, there is potential for land that remains designated as

Green Belt to be weaker, due to increased containment. However, in some locations it may be possible for a clearer Green Belt boundary to be defined – e.g. through use of a feature that marks a stronger, or more widely consistent, distinction between a built-up area and countryside.

**4.91** The extent of this impact upon the adjacent land that remains designated as Green Belt is limited by the strength of adjacent Green Belt land in relation to the Green Belt purposes. For example, the increased containment of land that is already judged to have limited distinction from the urban edge, and therefore plays a relatively limited role in relation to the Green Belt purposes, will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside, and therefore plays a more significant role in relation to the Green Belt purposes.

**4.92** Considering the impact on distinction provides a rating for the impact that the release of Green Belt land has on the integrity of adjacent Green Belt land, using a four-point scale of: *significant / moderate / minor / no or negligible*.

**4.93** Guidelines for each of the four rating levels are set out in **Table 4.5**.

Table 4.5 Factors affecting the impact of release on adjacent Green Belt land

Impact on adjacent Green Belt	
<b>Major</b> impact	Development has major impact on adjacent Green Belt as: <ul style="list-style-type: none"> <li>■ it significantly increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released;</li> </ul> and <ul style="list-style-type: none"> <li>■ it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</li> </ul>

Impact on adjacent Green Belt	
<b>Moderate</b> impact	<p>Development has a moderate impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> <li>■ it significantly increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released;</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary);</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it moderately increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>■ it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</li> </ul>
<b>Minor</b> impact	<p>Development has a moderate impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> <li>■ it moderately increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released.</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it minimally increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and</li> <li>■ it results in a minimally weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</li> </ul>
<b>No/Negligible</b> impact	<p>Development has no or negligible impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> <li>■ it does not lead to the containment of any adjacent land;</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it contains adjacent Green Belt land that plays a weaker role in relation to the Green Belt purposes than the land being released;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>■ it results in no significant change in strength of distinction between the inset settlement and the Green Belt (i.e. resulting in no significant change in strength of Green Belt boundary);</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>■ it results in a clearer or more consistent distinction between the inset settlement and the Green Belt (i.e. resulting in a clearer or more consistent Green Belt boundary).</li> </ul>

**Impact on distinction**

PAS guidance notes the types of areas of land that might seem to make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, including:

Land where development would be well contained by the landscape; or

Land where a strong boundary could be created with a clear distinction between ‘town’ and ‘country’. – [PAS Planning on the Doorstep](#).

**Step 5: Green Belt harm in parcels**

**4.94** The assessed contribution of land to the Green Belt purposes (Step 3) is combined with the assessment of the impact of its release on remaining land designated as Green Belt (Step 4) to determine an overall assessment of the harm of releasing land from the Green Belt. Variations in harm rating around an inset settlement are reflected in the definition of either a parcel or a sub-parcel.

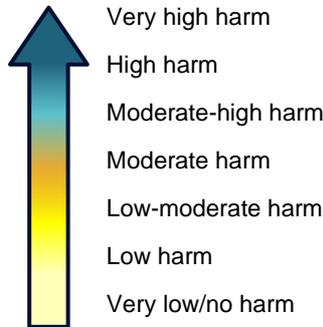
**4.95** Parcels have been defined to reflect clear variations in identified harm of Green Belt release, as well as variations in the reasons for identified harm of Green Belt release. As such, adjoining areas of land which are assessed to cause the same amount of harm from release but for significantly different reasons (such as land contributing to different purposes) have been assessed as separate parcels.

**4.96** Sub-parcels are identified within parcels to identify opportunities to potentially reduce harm to the Green Belt purposes, through release of only part of a parcel. Sub-parcels are identified in locations where:

- There are variations in contribution to Purpose 4 within a defined Green Belt parcel; and/or
- There is a small area of land with variation in harm from the wider parcel; and/or
- There is limited openness within part of a parcel due to the presence of development.

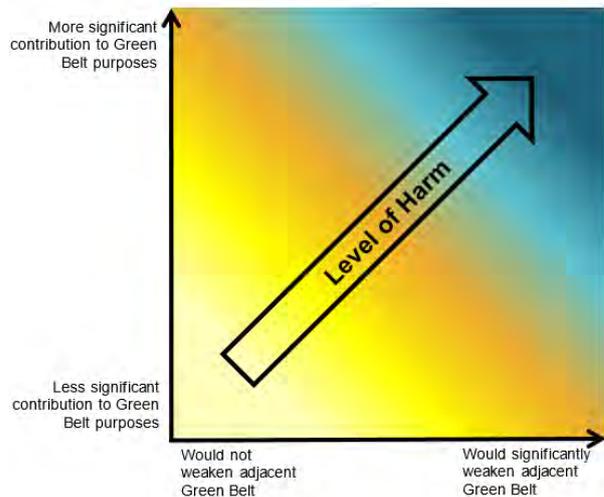
**4.97** As previously noted, the study assesses all land surrounding inset settlements in detail, extending out to the point beyond which development would result in a *very high/high* level of harm. Where land directly adjacent to an inset settlement is assessed to be *very high/high* harm, a parcel has been defined and a written assessment provided. The assessment of harm out from an inset edge is *cumulative*.

**4.98** Green Belt harm is rated using a seven-point scale ranging from very high to very low harm as follows:



**4.99** Figure 4.2 provides an indication as to how loss of contribution to the Green Belt purposes (Step 3) and the impact on adjacent Green Belt (Step 4) influence the overall harm of Green Belt release. However, **professional judgement** is used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm has been reached.

Figure 4.2 Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt



**Step 6: Green Belt harm beyond parcel boundaries**

**4.100** Having defined parcels and sub-parcels to reflect variations in harm to Green Belt purposes around the perimeter of an inset settlement, assessment Steps 1-5 as set out above have been in turn applied to the land beyond the outer boundaries of parcels assessed at less than *high* harm.

This constitutes a cumulative assessment of the 'inner' parcel already assessed and the land beyond it.

**4.101** If the harm resulting from expansion of release beyond a parcel's outer boundary is assessed to be *high*, commentary is provided to explain why the parcel's outer boundary marks this distinction.

**4.102** If on the other hand it is possible to identify a new boundary beyond the settlement-edge parcel within which harm is rated as less than *high*, an additional parcel, with separate analysis and ratings for contribution and impact on adjacent Green Belt, has been defined to reflect this.

### Green Belt harm assessment outputs

**4.103** The parcel assessments contain:

- an aerial view showing the parcel boundary and location;
- an OS map showing the parcel boundary and any absolute constraints;
- descriptions of the location, openness and distinction of the parcel;
- rating and supporting text assessing the contribution to the Green Belt Purposes 1-5;
- rating and supporting text assessing the potential impact of release on the distinction of adjacent Green Belt land;
- rating and supporting text assessing the overall harm to the Green Belt purposes of release of the parcel, considering loss of contribution to the Green Belt purposes and impact on adjacent Green Belt land;
- where appropriate, rating and supporting text on the potential to limit harm through more limited release of land within the parcel; and
- an OS map showing the parcel with colour-shaded variations showing the harm rating(s) and any areas of absolute constraint.

**4.104** Any potentially cross-boundary issues, such as cases where release of land within Enfield would harm the integrity of Green Belt land outside the borough, are addressed within the commentaries accompanying the individual parcel assessments.

**4.105** As part of this study, consideration has been given to the accuracy and robustness of the Council's existing Green Belt boundaries around each inset settlement with a view to recommending appropriate realignments along alternative permanent and readily recognisable physical features where necessary. Recommendations for minor boundary realignments so that the designation's boundaries are consistent

with the settlement edge, or to address previous GIS digitising errors, are set out in **Appendix B** as appropriate.

**4.106** Where the existing boundary cuts through large residential gardens, but otherwise follows the urban edge and is robust and regular, it is not always appropriate to realign the boundary (as in some cases the Green Belt boundary may have been drawn in these locations to limit the potential for further development within residential gardens).

## Chapter 5

# MOL Assessment Methodology

**5.1** This chapter sets out the methodology to be used to assess variations in harm to MOL that would result from the release of designated land in the borough.

**5.2** The adopted London Plan policy 7.17<sup>42</sup> states that national Green Belt policy applies equally to MOL. However, Policy G3 in the draft new London Plan<sup>43</sup> states that MOL is afforded the same status and level of protection as Green Belt, specifically protection from inappropriate development in accordance with national planning policy. This revised policy wording can be interpreted to mean that national Green Belt policy applies only insofar as it relates to the significance of the designation, the appropriateness of development within it and the policy mechanisms for evidencing and justifying alterations to the designations boundaries (i.e. the need to set out exceptional circumstances). This policy change<sup>44</sup> effectively acknowledges that the purposes of the designations, although similar, are different.

**5.3** The essential characteristics of Green Belts – openness and permanence (defined in **Chapter 2**) – apply equally to MOL. Both characteristics apply to Criterion 1<sup>45</sup> for designating new MOL in that the openness and permanence of designated land contribute to maintaining the physical structure of London by making it clearly distinguishable from the built-up area. Furthermore, the openness of MOL is inherently linked to its diverse range of functions as space for significant sport, leisure, recreation and cultural activities (Criterion 2), space for protected species and habitats, landscapes and historic environments (Criterion 3) and connected spaces that form part of a wider green infrastructure network (Criterion 4). Open land is designated as MOL to protect open spaces for leisure, recreation, sport, the arts and cultural activities (Criterion 2), protect features or landscapes of either national or metropolitan value (Criterion 3) and protect green chains, links, nodes or strategic corridors (Criterion 4).

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<sup>42</sup> London Plan (2011) [online] available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/current-londonplan/london-plan-chapter-seven-londons-living-spac-19>

<sup>43</sup> New Draft London Plan (2019) [online] available at: [https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_consolidated\\_changes\\_version\\_-\\_clean\\_july\\_2019.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf)

<sup>44</sup> Although the new Draft Local Plan has yet to be formally adopted, its advanced stage in the formal plan-making process make its contents a significant material consideration in the context of MOL planning.

<sup>45</sup> London Plan Policy 7.17 sets out the four criteria required to designate open land as MOL (see **Chapter 2**).

**5.4** The assessment of MOL therefore follows a similar structure to the Green Belt assessment, albeit considering different criteria.

### Extent of assessment area

#### Assessment approach

**5.5** There is no guidance on how MOL studies should be undertaken. However, an assessment focussing on the criteria for designating new MOL defined in adopted London Plan Policy 7.17 and the new London Plan policy G3 is considered appropriate.

**5.6** Each area of MOL has been assessed against each of the four MOL criteria. The harm of MOL release (in MOL terms) is assessed by considering MOL's contribution to the MOL criteria (Step 1) and considering the impact of MOL release on the distinction of adjacent/remaining MOL (Step 2).

**5.7** Step 2 of the assessment (assessing the impact of release on the distinction of adjacent MOL) is only considered if variations in contribution to the MOL criteria are identified in Step 1. This is because Step 2 of the MOL assessment only focusses on assessing the implications of release in the lower performing parts of MOL identified in Step 1. By focussing on the identified variations in contribution, the study only considers the impact of release on the remaining MOL, where harm can reasonably be minimised..<sup>46</sup>

**5.8** MOL sites put forward in response to the borough's Call for Sites carried out to inform the separate Enfield Capacity Study have not been directly assessed in this study. However, overlapping reasonable site options with the variations in harm identified in this study will provide a high-level indication of the likely harm of releasing site options in isolation. The assessment of sites is given further consideration in the 'next steps' section.

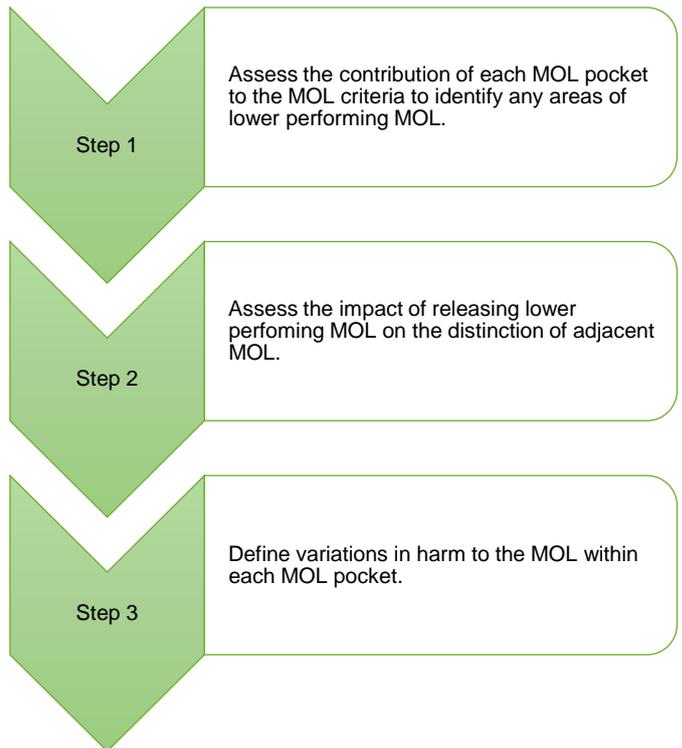
#### Exclusions

**5.9** MOL criterion 3 requires consideration of the presence of features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value, i.e. the same designations that are considered absolute constraints and thus excluded from the Green Belt assessment directly contribute to the performance of MOL for the purposes of the MOL criteria. Consequently, no designations and/or land uses have been excluded from MOL assessment.

### Harm assessment steps

**5.10** There are three steps to the MOL harm assessment as shown in **Figure 5.1**.

Figure 5.1 MOL harm assessment steps



**5.11** Step 3 combines the judgements from Steps 1 and 2 to arrive at conclusions regarding variations in harm, with sub-areas being defined to reflect these variations where possible.

### Step 1: Contribution of MOL parcels to MOL criteria

**5.12** To designate land as MOL, boroughs need to establish that the land meets at least one of the following criteria:

- Criterion 1: It contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- Criterion 2: It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole of or a significant part of London.

<sup>46</sup> Release of areas of higher harm in combination with areas of lower harm can be assumed to result in the highest rated level of harm identified within the area.

- Criterion 3: It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.<sup>47</sup>
- Criterion 4: It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.<sup>48</sup>

concerned with checking the outward unrestricted sprawl of London.

### Assessment of contribution to Criterion 1 – contribution to the physical structure of London by being clearly distinguishable from the built up area

**5.13** Where open, MOL is likely to be distinguishable from the urban area and therefore contribute to the physical structure of London. However, the study requires the definition of variations in the extent to which land meets this criterion. This requires an area-based assessment. MOL areas that contain built development that is inappropriate typically make a weaker contribution to MOL criterion 1, being less distinguishable from the built up area.

**5.14** The London Plan refers to the same national planning policy tests and definitions of inappropriate development as Green Belt. Therefore, development deemed to be ‘appropriate’ and ‘not inappropriate’ in the closed lists within paragraphs 145 and 146 of the NPPF are used.

**5.15** Openness relates to lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view (e.g. tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in MOL terms. The Green Belt case law and guidance relating to openness referenced in **Chapter 4** above is considered, in the absence of relevant case law to the contrary, equally relevant to the assessment of MOL.

**5.16** Urbanising influences, such as inappropriate development within the MOL, can reduce distinction between the urban area and the MOL.

**5.17** The same examples of Green Belt land uses listed as not affecting and affecting distinction in **Chapter 4** are considered to apply equally to MOL. Although containment from London’s built up area influences Green Belt land’s distinction from the urban edge, this is not relevant to an assessment of MOL’s contribution to criterion 1. This is because, by definition, all MOL is contained by the metropolitan urban area of London. How distinguished MOL is from the built-up area is only relevant insofar as it relates to the physical structure of London, whereas Green Belt distinction relates to the Green Belt purposes which are

<sup>47</sup> Note: new London Plan Policy G3 has made minor revisions to this criterion. The new criterion reads ‘it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value’. This is not considered to change the assessment.

<sup>48</sup> Note: new London Plan Policy G3 has made minor revisions to this criterion. The new criterion reads ‘it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria’. This is not considered to change the assessment.

Openness		Landform / Landcover
MOL contains no inappropriate development to diminish openness and is not contained by inappropriate development in MOL.	<p>Strong Contribution</p>	Landform/land cover creates a strong distinction from the built up area, e.g. motorways, railways, woodland blocks, rivers and floodplains.
MOL contains limited inappropriate development or is partially contained by inappropriate development in MOL, but retains sufficient open space for there to be a relationship with adjacent MOL.		Landform/land cover creates distinction from the adjacent built up area, e.g. major roads, consistent ridges and valleys.
MOL contains significant inappropriate development or is contained by inappropriate development in MOL, but the remaining open areas retain some relationship with adjacent MOL.		Landform/land cover creates some distinction from the built up area, e.g. linear tree cover or mature hedgerows, streams, notable landform/gradient changes, minor roads.
MOL is inappropriately developed or wholly or largely separated from the wider MOL area by inappropriate development in MOL, such that any remaining openness has more relationship with the built up area.		Landform/land cover do not create notable distinction from the built up area, e.g. garden and building edges, low hedgerows and access roads.
	Weak Contribution	

**Assessment of contribution to Criterion 2 – presence of open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole of or a significant part of London**

**5.18** The relative size of the borough’s MOL is considered to be the most appropriate proxy for assessing the relative significance of each area of MOL. The size guidelines for categorising the significance of London’s open spaces are set out in the supporting text to Policy 7.18 of the adopted London Plan and Policy G3 of the new London Plan. Regional Parks and Metropolitan Parks are described as follows:

- Regional Parks (400ha+) – Large areas, corridors or networks of open space, the majority of which are publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.
- Metropolitan Parks (60-399ha) – Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.

**5.19** All areas of MOL in excess of 60ha containing a range of facilities and features offering recreational, ecological, landscape, cultural and green infrastructure benefits are considered to make a **strong contribution** to criterion 2 in the first instance. However, such areas have been reviewed to determine whether there are discrete pockets that could be released without compromising the size and range of facilities and features available. Such discrete areas have been considered to make a **moderate contribution** to criterion 2.

**5.20** MOL areas that are less than 60ha are considered to make a more limited contribution to criterion 2, regardless of the range of facilities and features they contain. This is not to say that facilities and features in smaller areas of MOL are not important material considerations in planning terms, just that they are not considered to be important enough to merit the designation of open space as MOL under criterion 2 in isolation.

### Assessment of contribution to Criterion 3 – presence of features or landscapes (historic, recreational, biodiverse) of national or metropolitan value

**5.21** The following historic<sup>49</sup>, recreational<sup>50</sup>, ecological and landscape features of national and metropolitan value are considered in the assessment of criterion 3<sup>51</sup>:

- Listed buildings;
- Registered Parks and Gardens;
- Registered Battlefields;
- Scheduled Monuments;
- Conservation Areas;
- TFL Walk London Network Routes – Lea Valley Walk and the London Loop;<sup>52</sup>
- Metropolitan Sites of Importance for Nature Conservation (SINCs);
- European Natura 2000 Sites including Special Areas of Conservation, Special Protection Areas and Ramsar Sites;
- Sites of Special Scientific Interest;
- National Nature Reserves;
- Ancient Woodland; and
- London Geological Sites.<sup>53</sup>

**5.22** MOL overlapping with any one of these designations is recognised as making a **significant contribution** to criterion 3.

**5.23** MOL that does not overlap with the following ecological and recreational designations but is physically linked to MOL that does (i.e. is part of the same contiguous area of MOL) is recognised as making a **moderate contribution** to criterion 3:

- TFL Walk London Network Routes – Lea Valley Walk and the London Loop;
- Metropolitan Sites of Importance for Nature Conservation (SINCs);

- European Natura 2000 Sites including Special Areas of Conservation, Special Protection Areas;
- Sites of Community Importance and Ramsar Sites;
- Sites of Special Scientific Interest;
- National Nature Reserves; and
- Ancient Woodland.

**5.24** This is in acknowledgment of the potential for the wider area of MOL to be used by the area's users (listed species and/or members of the public) and/or the potential for the wider MOL to accommodate the future expansion of these designations. Open areas of MOL that are not green, such as surfaced car parks and sports pitches, could reasonably be returned to green space to add further value to the above ecological designations and so these areas have therefore not been downgraded against this criterion.

**5.25** Historic and landscape assets, however, must be considered an exception to this rule. The listings of historic assets within and directly adjacent to MOL have been reviewed to determine the contribution of the wider MOL to their setting and significance. In the absence of the wider MOL making a notable contribution to the setting and significance of a historic asset, **strong contribution** to MOL criterion 3 is restricted to within a 25m buffer of the historic designation.

**5.26** MOL that does not contain or lie adjacent to the designations listed above are recognised as making **no contribution** to criterion 3.

### Assessment of contribution to criterion 4 – forms part of a network of green infrastructure and meets one of the above criteria

**5.27** The London Borough of Enfield contains several Green Chains/Links and Wildlife Corridors designated in the Local Plan and acknowledged in the Mayor of London's 'Supplementary Planning Guidance of Green Infrastructure and Open Environments: The All London Green Grid'<sup>54</sup>. Notable links include:

- The Pymmes Brook Link, following a small tributary from Pickett's Lock on the River Lee out to Monken Hadley

<sup>49</sup> Archaeology Priority Areas have not been included due to the fact that they are designated and administered at the borough rather than the GLA level to mark areas where there is significant known archaeological interest and therefore significant potential for new discoveries.

<sup>50</sup> Note: Regional and Metropolitan Parks are assessed under criterion 2 and therefore are not listed for assessment under criterion 3. This is considered appropriate, given that an open space only needs to make a contribution to one of the four MOL criteria for designating new MOL to be considered appropriate for designation.

<sup>51</sup> World Heritage Sites and Strategic Views designated in the London Plan would have been considered in the Study, but none sit within or in the immediate vicinity of the borough.

<sup>52</sup> Transport for London's Walk London Network Routes: <https://tfl.gov.uk/modes/walking/top-walking-routes>

<sup>53</sup> London geodiversity Partnership – List of London's Geological Sites: <http://londongeopartnership.org.uk/londonsgeositeslist/>

<sup>54</sup> Supplementary Planning Guidance of Green Infrastructure and Open Environments: The All London Green Grid: [https://www.london.gov.uk/sites/default/files/algg\\_spg\\_mar2012.pdf](https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf)

Common in the Green Belt. The Pymmes Brook Trail links with the London LOOP in the north and the Lee Valley Walk in the south, passing through a number of parks, including Arnos Park and Pymmes Park.

- The Salmon Brook Link, passing through Enfield Golf Course, Bush Hill and Bury Lodge Park to the Lee Valley Park at Pickett’s Lock.
- The New River and Enfield Link, running through Bush Hill Park golf course and the Town Park, connecting with the town centre. The route follows the river as it loops around the town and playing fields. The Link then moves north through largely residential areas and connects with the Green Belt at Myddelton House and Gardens and Capel Manor College.
- The Turkey Brook Link follows the London LOOP from the Lee Valley Walk at the Prince of Wales Open Space via Albany Park and through built areas connecting to Forty Hall Country Park, Hillyfields Park and Whitewebbs Park in the Green Belt to the west.

**5.28** MOL making a contribution to criteria 1, 2 or 3 and directly connected with these strategic corridors are recognised as making a contribution to criterion 4<sup>55</sup>. The significance of the contribution corresponds to the highest level of contribution identified under criteria 1, 2 and 3<sup>56</sup>. MOL that is not connected or aligned with these recognised strategic corridors is assessed as making **no contribution** to criterion 4.

### Step 2: Assess impact of release on adjacent MOL

**5.29** Judgements on the impact of release on the distinction of adjacent MOL are only considered where variations in contribution to the MOL criteria have been identified, i.e. in locations where there is potential to minimise harm in a given area of MOL. This is because the potential number of scenarios for MOL release within any given area of MOL is almost infinite. By focussing on the identified variations in contribution the study only considers the implications of the impact of release on the distinction of adjacent MOL where harm can reasonably be minimised.

**5.30** The nature of any boundary features, i.e. the role in maintaining separation and/or screening views of the built-up area, are considered as part of the assessment of the

potential impact of releasing MOL on adjacent MOL. This determines the extent to which adjacent land incurs loss of integrity – i.e. a loss of distinction with the built up area.

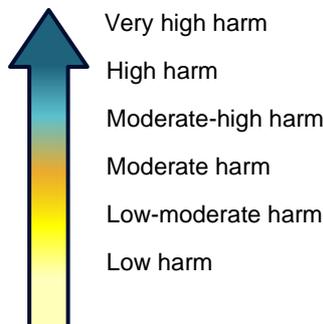
**5.31** If a revised MOL boundary results in a less distinct boundary between the built-up area and the MOL, the release of the area of MOL under assessment is likely to weaken the land that remains designated as MOL. However, in some locations it may be possible for a clearer MOL boundary to be defined, for example through use of a feature that marks a stronger, or more widely consistent, distinction between a built-up area and MOL.

**5.32** Unlike the Green Belt assessment, impact on the distinction of adjacent MOL has not been assessed and rated separately to the assessment of the MOL harm of MOL release. Where relevant, the impact of releasing MOL on the distinction of adjacent MOL is described in the harm judgements at the bottom of each **Appendix C** report.

### Step 3: Define variations in harm to the MOL

**5.33** Judgements on the harm of release are a product of the significance and range of contributions a given area of MOL makes to the MOL criteria (Step 1) and, where relevant, the impact of its release on the distinction of adjacent MOL (Step 2)<sup>57</sup>. **Figure 5.2** provides an indication as to how loss of contribution to the MOL criteria (Step 1) and the impact on adjacent MOL (Step 2) influence the overall harm of MOL release. However, **professional judgement** has been used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of MOL harm has been reached.

**5.34** MOL harm is rated using a seven-point scale ranging from very high to very low/no MOL harm:



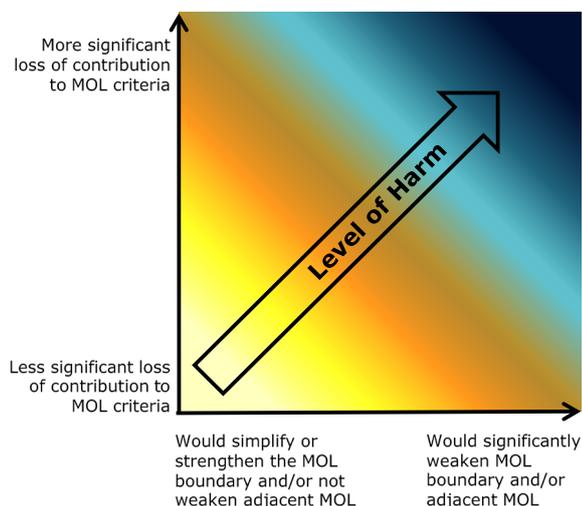
<sup>55</sup> Note: the London Plan states that in order for criterion 4 to apply open spaces must form part of a strategic network of green infrastructure and meet one of the other criteria.

<sup>56</sup> Again, the areas of the MOL that are not green but are fundamentally open land could reasonably be returned to green space with green infrastructure value and have therefore have also not been downgraded against this criterion.

<sup>57</sup> It should be noted that judgements on the impact of release on the distinction of adjacent MOL and the implications of splitting MOL in two are only considered where variations in contribution to the MOL criteria have been identified, i.e. in locations where there is potential to minimise harm in a given area of MOL.

Very low/no harm

Figure 5.2 Guidelines for rating harm on the basis of contribution to MOL criteria and impact of release on adjacent MOL



realignments along alternative permanent and readily recognisable physical features where necessary. Recommendations for minor boundary re-alignments so that the designations' boundaries are consistent with the settlement edge, or to address previous GIS digitising errors, are set out in MOL assessment proformas in **Appendix C** as relevant.

**5.35** Where MOL makes a strong contribution to at least one of the MOL criteria, the harm of releasing the land from the designation is recorded as at least high. Areas of potential very high harm have also been identified where MOL is found to contribute strongly to three or more of the MOL criteria or two or more criteria and maintain a connection between otherwise separate parts of the MOL.

**5.36** Release of areas of higher harm in combination with areas of lower harm can be assumed to result in the highest rated level of harm identified within the area.

### MOL harm assessment outputs

**5.37** The MOL harm assessments will follow a similar structure to the Green Belt harm outputs described in Chapter 4 above, with the following exceptions:

- The assessment of MOL openness and distinction is considered in the assessment of contribution to MOL criterion 1, not separately, given the nature of MOL criterion 1; and
- The assessment of impact on the distinction of adjacent MOL (i.e. contribution of adjacent MOL to criteria 1) is included and described alongside the assessment of the MOL harm of releasing the lower performing areas of the MOL.

**5.38** As with Green Belt, consideration has been given to the accuracy and robustness of the Council's existing MOL boundaries, with a view to recommending appropriate

# Chapter 6

## Green Belt Assessment Findings

**6.1** This chapter summarises the findings of the Green Belt assessment. The Green Belt assessments can be broadly broken down into two discrete outputs:

- **Contribution** to the Green Belt purposes (the product of assessment steps 1, 2 and 3 set out in **Chapter 4**), i.e. the relative performance of the borough's Green Belt rated against the five purposes of Green Belt set out in NPPF paragraph 139; and
- **Harm** to the Green Belt purposes associated with Green Belt release (the product of assessment steps 4, 5 and 6 set out in **Chapter 4**), i.e. the impact of Green Belt loss, a product of the loss of Green Belt land's contribution and the effect of release on the contribution of remaining Green Belt land.

**6.2** **Figures 6.1, 6.2, 6.3, 6.4 and 6.5** illustrate the contribution of Enfield's Green Belt land to each of the five Green Belt purposes. All Green Belt land within the borough has been assessed.

**6.3** **Figure 6.6** illustrates the harm of releasing Green Belt land out from the existing inset urban edges of within and directly adjacent to the borough. **Figure 6.6** includes the parcel boundaries and references used to draw out the detailed variations in potential Green Belt harm. Green Belt land has been parcelled out to a point beyond which release out from the urban edge would result in a high or very high level of harm to the Green Belt purposes (see Step 6 in **Chapter 4**).<sup>58</sup> To be clear, beyond these outer parcel boundaries all Green Belt release is judged to result in high or very high harm to the Green Belt purposes. Parcels have been drawn adjacent to all existing inset urban edges within and directly adjacent to the borough, even where release is judged likely to cause high or very high harm immediately adjacent to the urban edge.

**6.4** The detailed judgements associated with the contribution of Green Belt land and the harm of release (in Green Belt terms) within each parcel are set out in the proforma in **Appendix B**. The assessment proforma rate each parcel's contribution to each Green Belt purpose (Steps 1-3), the impact of release within each parcel on adjacent Green Belt

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<sup>58</sup> Harm increases with distance from settlement edges, as the release of larger areas clearly has more potential to weaken the integrity of the Green Belt by extending into areas that have a greater distinction from urban edges, by

diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside.

land (Step 4) and the overall harm of release within each parcel (Step 5).

**6.5** The parcels illustrated in **Figure 6.6** and each of the Green Belt assessment proformas in **Appendix B** exclude the absolute constraints listed in **Chapter 4**. This is because strategic release for development in these areas would not be permitted for other environmental and/or policy reasons, so the harm of their release for development is not relevant for the purposes of this study.

## Green Belt contribution

**6.6** The vast majority of the borough's Green Belt makes a strong contribution to at least two of the Green Belt purposes, noting that purpose 5 rates equally strongly across the entirety of the borough's Green Belt. Notable areas of the borough's Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include the open land<sup>59</sup>:

- North of Hadley Wood in between Greater London and Potters Bar in neighbouring Hertsmere to the north; and
- Associated with the historic landscapes of Trent Park, Clay Hill and Forty Hill, contiguous with historic London.

**6.7** The lowest contributing Green Belt within the borough is either inappropriately developed Green Belt land where there is a distinct lack of openness, or particularly contained pockets of Green Belt associated with the inset urban area of Greater London and isolated from the wider open countryside. Notable developed and isolated areas include:

- Inappropriate developments associated with the commercial and industrial estates adjacent to the inset urban area of Crews Hill;
- Inappropriate development associated with inset urban area of Greater London north of Goat Lane in Forty Hill;
- Contained land to the east of Great Cambridge Road associated with Hoe Green Park and Junction 25 of the M25;
- Contained land adjacent to Mollison Avenue west of Enfield Island Village;
- Inappropriate development associated with the historic Wright's Flour Mill east of Ponders End railway station in the Lee Valley; and

- Contained land east of Deephams Sewage Treatment Works and west of William Girling Reservoir either side of Lee Park Way in the Lee Valley.

**6.8** The following sections describe the broad patterns of strategic contribution to each Green Belt purpose.

### Contribution to Green Belt purpose 1 – to check the unrestricted sprawl of large built-up areas

**6.9** Contribution to purpose 1 is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built up area of Greater London.

**6.10** The land which sits immediately adjacent to the inset urban edges of Greater London is generally considered to make the strongest contribution to purpose 1, by virtue of its close proximity to the large built-up area. Beyond the first few consistent readily recognisable and permanent boundary features, farther away from the urban edge of Greater London the Green Belt's contribution is considered to be lower; however, relative to the size of the Greater London conurbation, all open and more remote Green Belt land within the borough (all of which is located to the south of the strong boundary formed by the M25 ring road) is considered to be relatively close to Greater London and therefore makes at least a relatively strong contribution to purpose 1.

**6.11** Inappropriate development<sup>60</sup> within the Green Belt generally lowers contribution to purpose 1 to relatively weak or weak/no contribution, for example the commercial and industrial estates adjacent to the inset urban area of Crews Hill.

**6.12** Open Green Belt land contained by the urbanising influences of the urban edges, as well as inappropriate development washed over by the designation, and/or retained by strong boundary features that significantly reduce land's relationship with the wider countryside, also make a lower contribution to purpose 1 by virtue of their stronger association with the urban areas. For example, this applies to the land to the west of the Lee Navigation in the Lee Valley. These areas still generally make a moderate or relatively strong contribution to purpose 1 by virtue of their openness and close proximity. There are, however, several notable exceptions – generally thin strips of open Green Belt land that are particularly contained and influenced by the urban areas – that have almost no relationship with the wider countryside. These

<sup>59</sup> Green Belt land only needs to contribute to one of the Green Belt purposes to be of value in Green Belt terms. It should be noted therefore that a strong contribution to multiple Green Belt purposes is not necessarily more important than a strong contribution to a single purpose. However, the greater number of contributions across all five purposes the greater the likelihood that the Green Belt is of notable importance/value in Green Belt terms.

<sup>60</sup> Such inappropriate development in the Green Belt may have been constructed prior to the designation of the Metropolitan Green Belt or have been permitted following appropriate demonstration of the necessary 'very special circumstances' referenced in paragraphs 143 and 144 of the NPPF.

areas make a relatively weak or weak/no contribution to purpose 1.

### Contribution to Green Belt purpose 2 – to prevent neighbouring towns merging into one another

**6.13** Contribution to purpose 2 is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

**6.14** The majority of the Green Belt land within the borough makes a relatively weak or weak/no contribution to purpose 2 due to the fact that the vast majority of the borough's Green Belt does not sit within a fully functioning gap between two neighbouring separate towns.

**6.15** The western third of the borough's Green Belt, to the west of the railway line adjacent to Crews Hill, makes a contribution to purpose 2. The open Green Belt land to the north of Hadley Wood within the relatively narrow gap between Greater London and the neighbouring town of Potters Bar directly north of the M25 makes a strong contribution. The open land directly to the east of the narrowest portion of the gap either side of the Ridgeway Road that connects central Enfield with Junction 24 of the M25 and Potters Bar beyond is considered to make a relatively strong contribution.

**6.16** The northern edge of Hadley Wood which is contiguous with Greater London to the south represents the closest urban edge to neighbouring Potters Bar to the north. The land immediately to the west and east of the Hadley Wood lie adjacent to the noted gap but farther away than the northern edge of Hadley Wood. Consequently, these areas make a more moderate contribution. The land to the east of Hadley Wood containing Trent Park and the open countryside to the east is considered to contribute less to maintaining separation between Greater London and Potters Bar than the land to the west which is generally much closer to the narrowest part of the gap; however, the land to the east is still considered to make a moderate contribution overall due to the secondary role this area plays in maintaining separation between World's End and Enfield to the east and Cockfosters and Hadley Wood to the west. The significance of this secondary gap to purpose 2 is considered to be relatively low in isolation due to the referenced urban areas generally forming part of the same contiguous part of Greater London. Furthermore, Trent Park Registered Park and Garden is likely to remain open and maintain separation in the long term.

**6.17** The Lee Valley at the eastern edge of the borough maintains separation between different parts of the Greater London conurbation: Brimsdown and Edmonton in Enfield to the west and Chingford in neighbouring Waltham Forest to the east. The open Green Belt land in the Lee Valley consistently

maintains separation along the entirety of the borough's boundaries and continues to maintain east-west separation between urban areas farther south into the heart of the city of London. Consequently, the majority of the open Green Belt land within the Lee Valley is considered to contribute to purpose 2 to some degree. The open King George's and William Girling Reservoirs represent the vast majority and most significant separating features in the borough's portion of the Lee Valley. Consequently, they are considered to make a strong contribution to purpose 2. The borough's Green Belt land to the north, east and west of these significant separating features and the associated waterways of the Lee Navigation and Lee River make a relatively weak contribution to purpose 2. This is because these narrow strips of Green Belt land are retained by the reservoirs and waterways in very close proximity to the urban edges, limiting their significance as separating features in their own right.

**6.18** The open Green Belt land to the south of the reservoirs in the Lee Valley sit in the narrowest and most fragile portion of the gap between Enfield and Waltham Forest. However, the area's distinction from the urban edges to the east, west and south vary from moderate to weak due to the presence and changing influence of some significant urbanising influences in the area, such as the Edmonton waste incinerator. Consequently, contribution to purpose 2 in the south eastern corner of the borough's Green Belt is a mixture of relatively strong and moderate.

**6.19** The north eastern corner of the borough's Green Belt (also in the Lee Valley) also sits on the periphery of what remains of the narrow gap between Enfield and Waltham Abbey in Epping Forest District to the north east. The urban area of Cheshunt to the north, which has merged with Greater London in Enfield to the west, contains what remains of this open narrow gap within Enfield, limiting its contribution to moderate.

**6.20** The pockets of relatively weak or weak/no contribution to purpose 2 within the general areas of contribution highlight areas of the Green Belt that contain inappropriate development and/or containment by the urban edge of Greater London, limiting the Green Belt's role in maintaining separation. For example, the land to the west of the Lee Navigation in the Lee Valley.

### Contribution to Green Belt purpose 3 – to assist in safeguarding the countryside from encroachment

**6.21** Contribution to purpose 3 is assessed by determining how the level of openness and distinction from the inset urban areas of Greater London and Crews Hill affect Green Belt land's perception as countryside.

**6.22** The vast majority of the Green Belt land in the borough is open and has strong distinction from the urban areas of Crews Hill and Greater London, and therefore makes a strong contribution to purpose 3.

**6.23** Inappropriate development within the Green Belt generally lowers contribution to purpose 3 to relatively weak or weak/no contribution, for example the commercial and industrial estates adjacent to the insert urban area of Crews Hill. However, the more isolated and generally less dense pockets of inappropriate development, such as the village of Botany Bay and the development in the centre of Trent Park, make a more moderate contribution to purpose 3 by virtue of their greater distinction from the urban area of Greater London.

**6.24** Open Green Belt land directly adjacent to the urban edge of Greater London containing appropriate land uses in Green Belts, but which comprise land uses such as outdoor sports pitches and cemeteries which have a direct association with the adjacent urban area than the wider countryside are recognised as making a slightly lower contribution to purpose 3. These areas rate no more than a relatively strong contribution to purpose 3, and potentially as low as weak/no contribution depending on their relative distinction from the urban area of Greater London. For example the open sport and recreation grounds associated with Chapel Manor College Gardens and the Tottenham Hotspur Training Grounds, which have relatively strong distinction from the urban area of Greater London to the east, are recognised as making a relatively strong contribution to purpose 3, whereas the relatively contained Enfield Cemetery separated from the wider countryside to the west by the Great Cambridge Road has a lower distinction from the urban area of Greater London and therefore makes a relatively weak contribution to purpose 3.

**6.25** Open Green Belt land contained by the urbanising influences of the urban edges, as well as inappropriate development washed over by the Green Belt, and/or retained by strong boundary features that significantly reduce the land's relationship with the wider countryside also make a lower contribution to purpose 3 by virtue of their stronger association with the urban areas. For example, this applies to the land to the west of the Lee Navigation in the Lee Valley. These areas still generally make a moderate or relatively strong contribution to purpose 3 by virtue of their openness and close proximity. There are, however, several notable exceptions – generally thin strips of open Green Belt land that are particularly contained and influenced by the urban areas –

that have almost no relationship with the wider countryside. These areas make a relatively weak or weak/no contribution to purpose 3.

#### Contribution to Green Belt purpose 4 – to preserve the setting and special character of historic towns

**6.26** To establish the extent and significance of the contribution of the borough's Green Belt to purpose 4 it is necessary to establish if any of the historic elements within and associated with historic London have a physical and/or visual relationship with the borough's Green Belt land. Where available, the listings of all historic assets within and in the immediate vicinity of the Green Belt have been reviewed to determine what role the open Green Belt plays in their significance/setting. In isolation, no listed building or scheduled monument records across the study area noted the open countryside (designated as Green Belt) as important to their setting, so none are recognised as influencing contribution to Purpose 4. The listings of Registered Park and Gardens<sup>61</sup> and Conservation Areas within and adjacent to the Green Belt have also been reviewed.

**6.27** The borough's Conservation Area appraisals offer useful insights into the role of the open countryside in preserving the setting and special character of historic London. Where Conservation Areas overlap with the Green Belt and their appraisals note the openness of the countryside/Green Belt as important, all Green Belt land within the Conservation Area is judged to make a strong contribution to purpose 4. This includes Green Belt land in Clay Hill, Enfield Lock, Forty Hill, Ponders End and Trent Park. All inappropriate development (in Green Belt terms) within Conservation Areas, regardless of how historic it may be, was deemed to reduce the openness of the Green Belt and therefore the designation's contribution to the setting and special character of historic London. As such, all inappropriately developed Green Belt land within Conservation Areas was rated as making a 'weak/no contribution'.

**6.28** Where appraisals noted open views of the countryside/Green Belt adjacent to Conservation Areas, the general extent of the views into the Green Belt has been studied and all visible Green Belt land was judged to make a strong contribution to purpose 4. Where wider views outside Conservation Areas were not noted, the Green Belt land adjacent to Conservation Areas was recorded as making 'weak/no contribution'. Notable views include:

- At the northern boundary of the Clay Hill Conservation Area at South Lodge, tree cover falls away around the

<sup>61</sup> The Registered Park and Gardens within the borough's Green Belt fall entirely within some of the borough's Conservation Areas.

Whitewebbs Park golf course, giving good views of the rural landscape designated as Green Belt to the north;

- The Clay Hill Conservation Area reaches a plateau at the junction with Theobalds Park Road, Flash Lane and Strayfield Road, where again the landscape opens out. To the north, walls and hedges are replaced by post and rail fences and individual trees, including a fine row of evergreen oaks opposite the Fallow Buck, which allow views over the rolling countryside to the north;
- There are also good views from the Clay Hill Conservation Area looking south across the valley from the footpath connecting St. John's Church and the Turkey Brook towards the trees of the Lavender Hill cemetery;
- The southern half of the Enfield Lock Conservation Area is open and embraces the wider landscape. The appraisal notes views "South from the lock bridge along Swan and Pike Road and then across via Swan and Pike Pool to the River Lea towpath, there are fine views along the Lea Navigation's tree and bush-lined banks to Swan and Pike Wood and towards open fields and trees, although the pumping station on the northern edge of the King George V reservoir looms on the horizon, and pylons take giant careless strides across the landscape. This section offers contrasting experiences of long views close to smaller more intimate wooded prospects..."; and
- The Hadley Wood Conservation Area borders the open Green Belt to the north, west and east, although views of the open countryside are restricted only to the west and north west. The appraisal notes; "attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods".

**6.29** All other Green Belt land within the borough is considered to make a weak/no contribution to purpose 4. Further information on the borough's historic environment can be found in **Chapter 3** and the detailed site assessment reports in **Appendices B** and **C**.

### Contribution to Green Belt purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

**6.30** All of the borough's Green Belt is judged to make an equally strong contribution to Green Belt Purpose 5 in acknowledgement of the significant role the borough's Green Belt has and continues to play in encouraging the recycling of derelict and other urban land in the urban area before brownfield land in the Green Belt. Further variation has not been identified because, as explained previously in the

methodology, the nature of Enfield's settlement pattern prohibits the study from drawing out a meaningful distinction between the availability of brownfield land within individual settlements.

### Green Belt harm

**6.31** Given the strong contribution of the majority of the borough's Green Belt to at least two of the Green Belt purposes, the vast majority of assessment parcels within the borough's Green Belt would result in high or very high Green Belt harm were they to be released.

**6.32** The release of the areas of the borough's Green Belt containing inappropriate development in close proximity to the urban edges of Greater London and Crews Hill would, however, generally result in lower Green Belt harm, ranging from very low to low-moderate depending on both the irregular nature of the resulting Green Belt boundary they would create and also their influence on the distinction of adjacent Green Belt land. Notable examples include the commercial and industrial estates adjacent to the inset urban area of Crews Hill, which would result in very low or low Green Belt harm if released.

**6.33** Open Green Belt land contained by urbanising influences and/or retained by strong boundary features that significantly reduce the likely harm of release on the distinction of adjacent Green Belt land are likely to result in lower harm if released. These areas rate no more than high harm and as low as very low harm depending on their relative distinction from the urban areas, their role in maintaining separation between distinct towns either within or in close proximity to Greater London, their contribution to the setting and special character of historic London and the likely impact of their release on the distinction of adjacent Green Belt land. Notable examples include Green Belt land adjacent to, and sometimes retained by, Mollison Avenue along the western edge of the Lee Valley Green Belt within the borough.

**6.34** There are three pockets of Green Belt land (one to the north, one to the south and one to the south east of Crews Hill) that are judged to generate high Green Belt harm if released in combination with the Green Belt land in between them and the inset urban area of Crews Hill. However, these areas have not been assigned parcel boundaries for detailed assessment reporting because of their relative distance from the inset urban area of Crews Hill and their strong distinction from it. These three areas are judged to result in high harm rather than very high harm if released for the following reasons:

- The land to the north of Crews Hill and south of the M25 makes a strong contribution to purposes 3 and 5 and a

relatively strong contribution to purpose 1; however, its release in combination with the Green Belt land to the south up to the northern edge of Crews Hill would have a relatively minor/negligible impact on the distinction of the adjacent Green Belt land due to the presence of strong boundary features – notably a railway line to the west, the M25 to the north and the treelined Cuffley Brook to the east.

- The land to the south of Strayfield Road and north of Strayfield Road Cemetery makes a strong contribution to purposes 1, 3 and 5; however, its release in combination with the Green Belt land to the north up to the southern edge of Crews Hill would have a relatively minor/negligible impact on the distinction of the adjacent Green Belt land due to the presence of strong boundary features – notably a railway line to the west, and the cemetery to the south – and the presence of existing inappropriate development associated with the washed over settlement of Clay Hill to the east.
- The land to the east of Theobalds Park Road and the Theobalds Park Industrial Estate in between the pockets of ancient woodland makes a strong contribution to purposes 3 and 5 and a relatively strong contribution to purpose 1; however, its release in combination with the Green Belt land to the north and west up to the southern edge of Crews Hill would have a relatively minor impact on the distinction of the adjacent Green Belt land due to the presence of strong boundary features – notably a railway line to the west, the treelined Whitewebbs Road to the north and the surrounding pockets of ancient woodland associated with Cuffley Brook and Whitewebbs Park to the east. The southern and western boundary of this area is not strong, being formed of small access roads. The Green Belt land to the south would become partially more contained in between Theobalds Park Road and Flash Lane; however, the sparse tree cover and the existing influence of the existing inappropriate development associated with the washed over settlement of Clay Hill to the south west limit the significance of the impact in this direction. Similarly, the Green Belt land to the north of Whitewebbs Road would also become partially more contained, but the road and the mature trees that line it would mitigate urbanising influence in this direction. Although the clear readily recognisable boundary of Cuffley Brook would be breached with the release of the northern portion of this area, Whitewebbs Road to the north and the large pocket of ancient woodland to the east in Whitewebbs Park represent much clearer and readily recognisable Green Belt boundary features when compared to this open stretch of the brook.

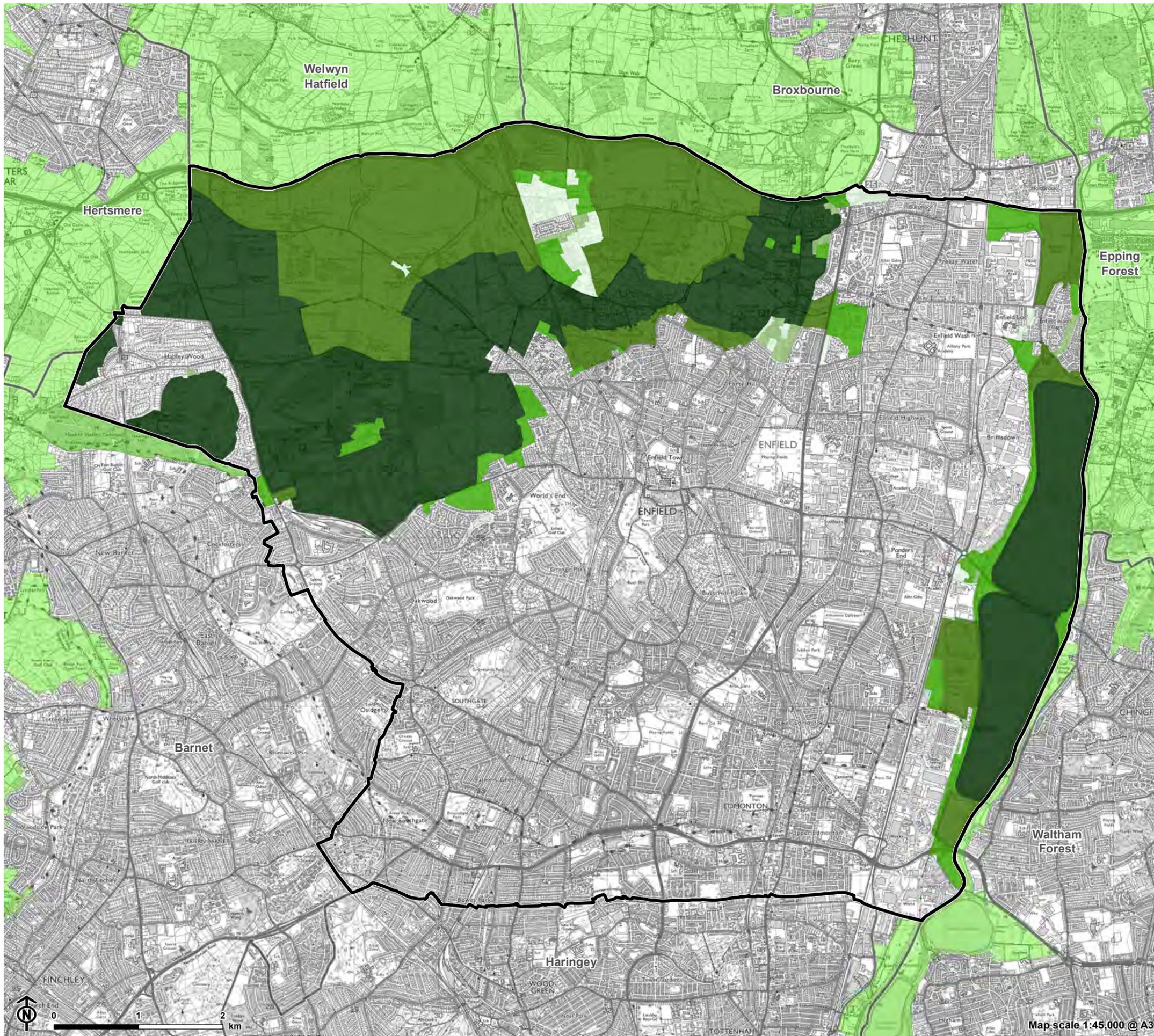


Figure 6.1 – Contribution to Green Belt Purpose 1 – Check the unrestricted sprawl of the large built-up area

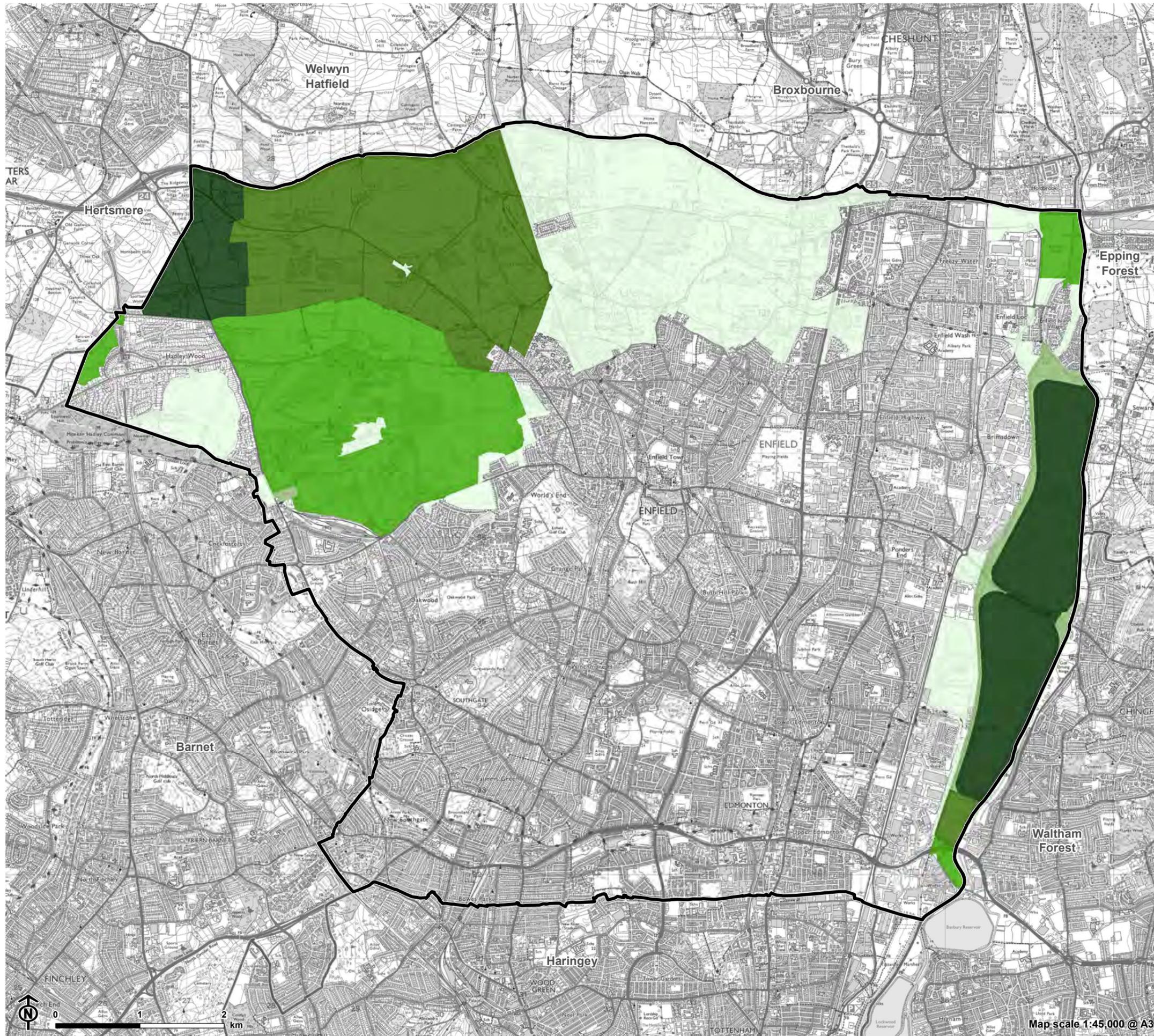
- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt
- Contribution rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no



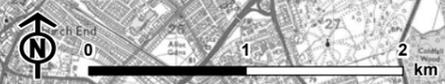
Map scale 1:45,000 @ A3



Figure 6.2 – Contribution to Green Belt Purpose 2 – Prevent neighbouring towns from merging into one another



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Contribution rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no



Map scale 1:45,000 @ A3



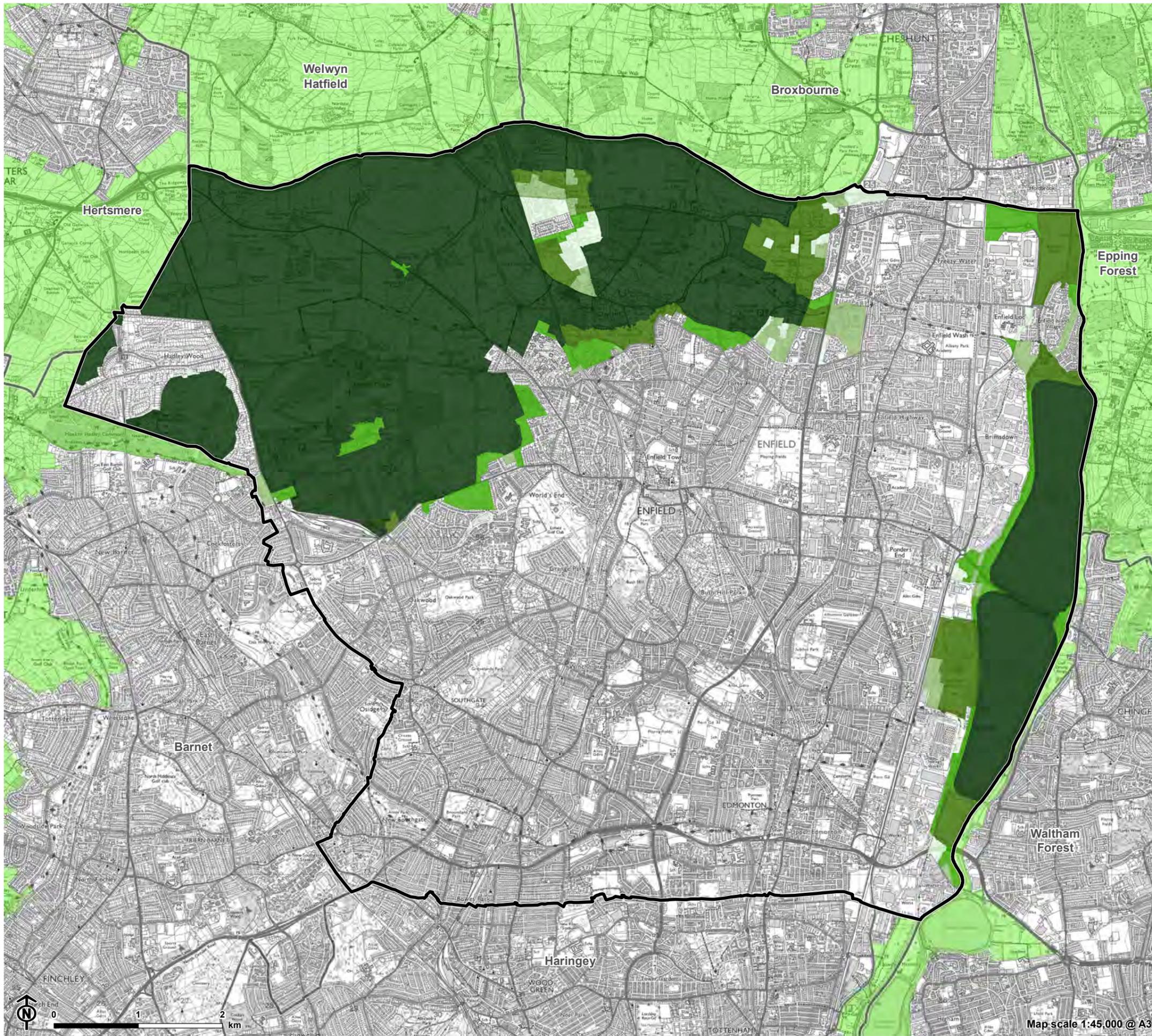


Figure 6.3 – Contribution to Green Belt Purpose 3 – Assist in safeguarding the countryside from encroachment

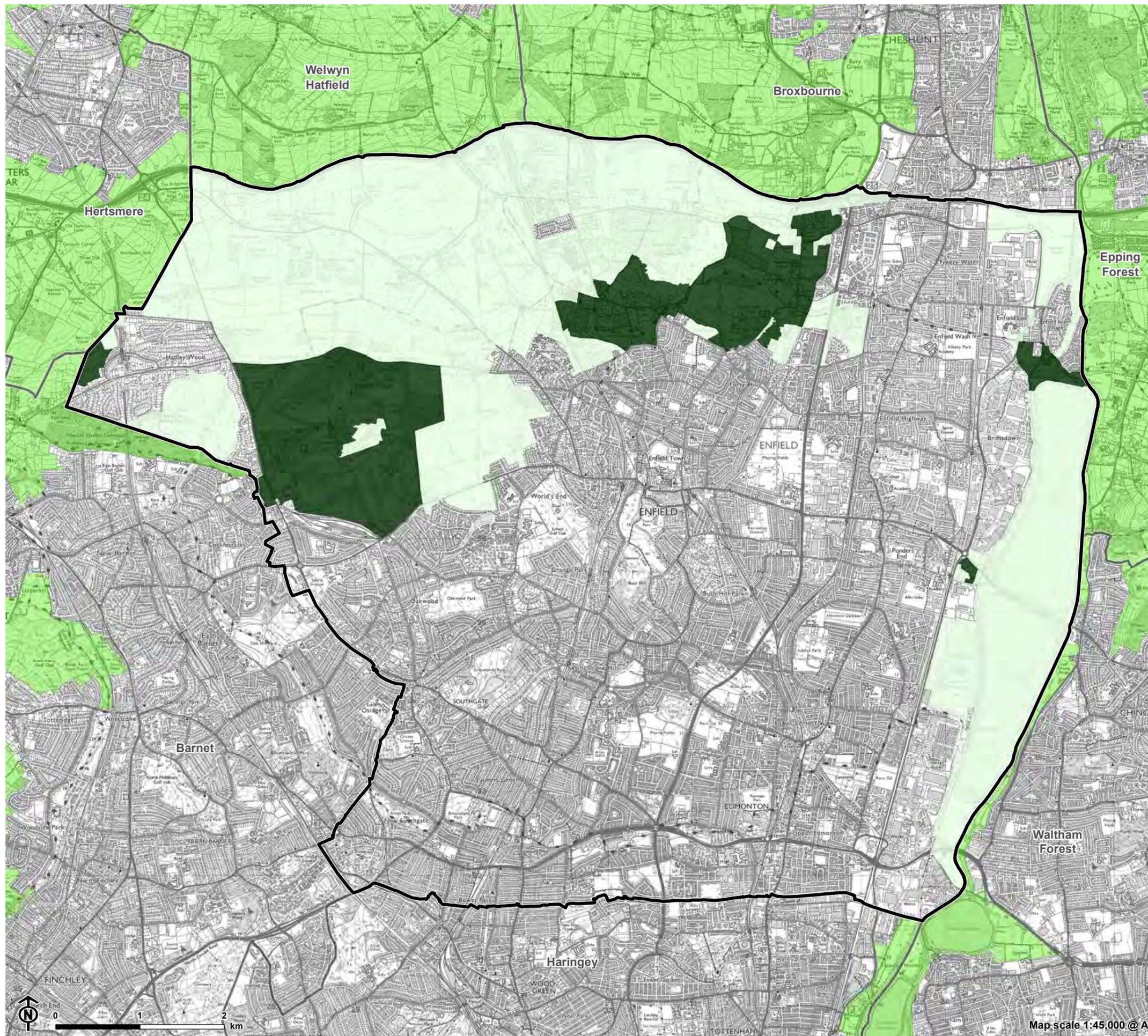
- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt
- Contribution rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no



Map scale 1:45,000 @ A3



Figure 6.4 – Contribution to Green Belt Purpose 4 – Preserve the setting and special character of historic towns



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt
- Contribution rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no

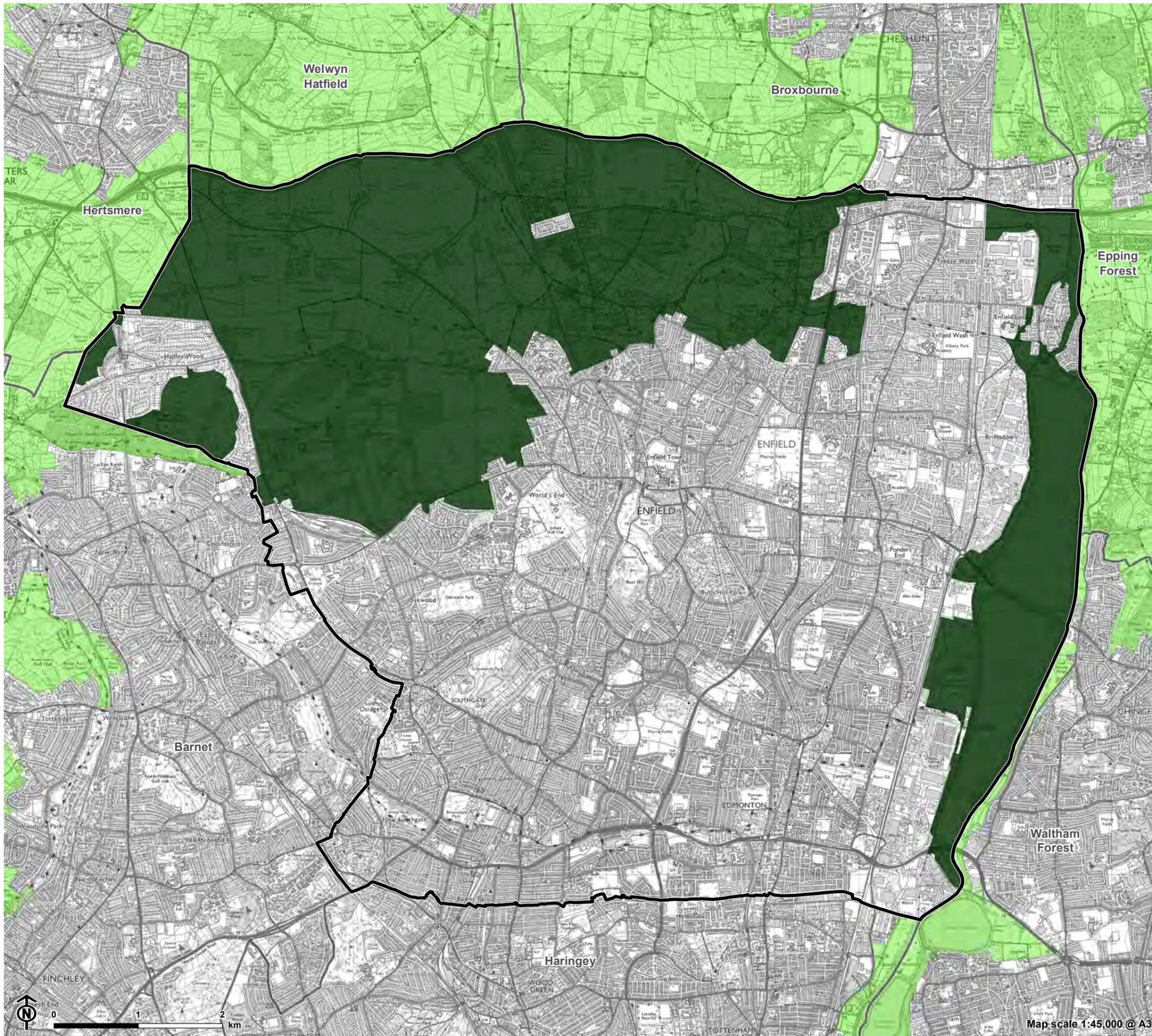


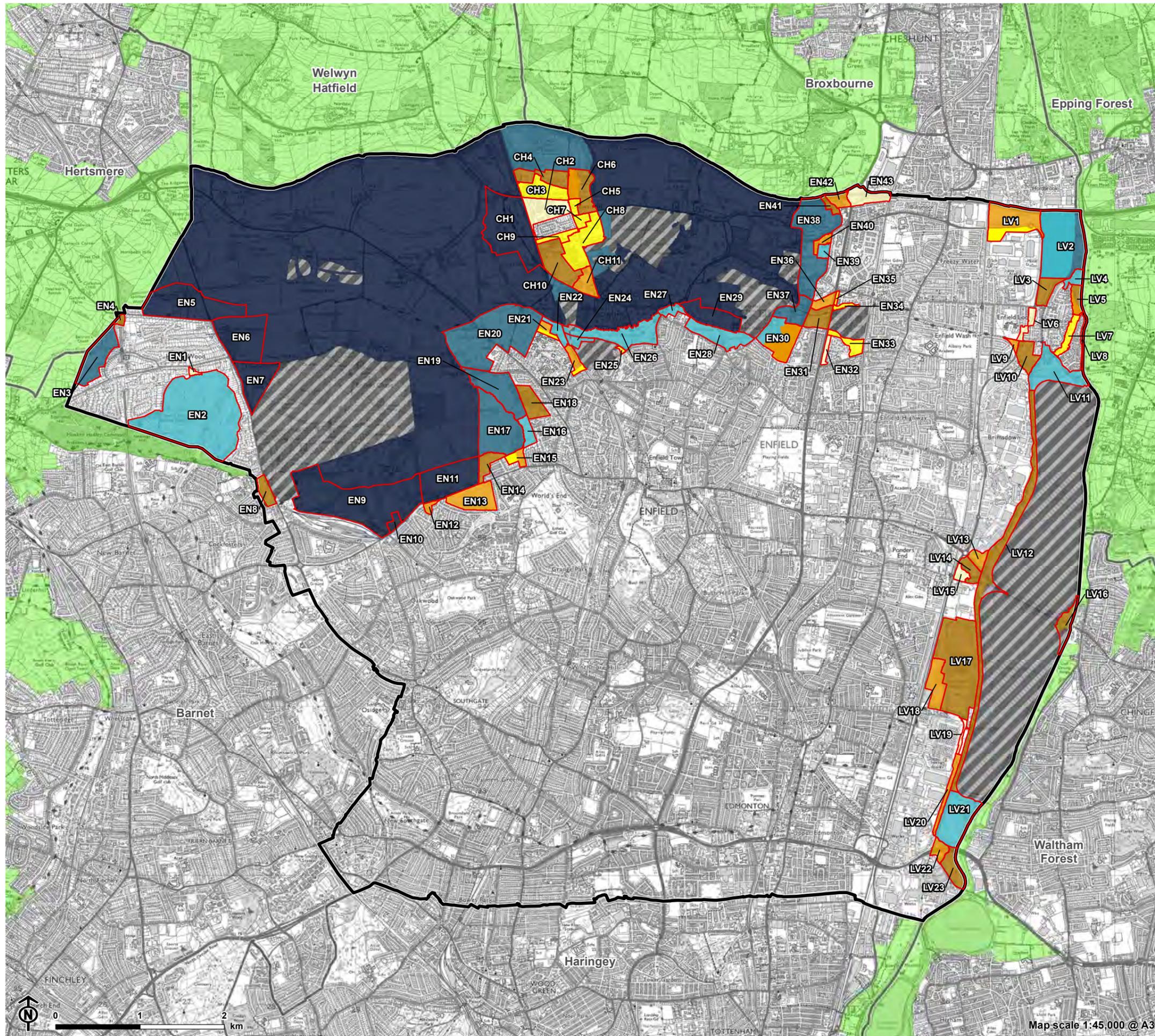
Figure 6.5 – Contribution to Green Belt Purpose 5 – Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt
- Contribution rating**
- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no





Figure 6.6 – Green Belt harm of releasing land from the designation



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt parcel
- Neighbouring authority Green Belt
- Green Belt harm of release**
- Very high
- High
- Moderate high
- Moderate
- Low moderate
- Low
- Very low
- Absolute constraint

\* The following designations are considered to be absolute constraints prohibiting strategic Green Belt release/development: Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest, Registered Parks and Gardens, Scheduled Monuments, Ancient Woodland and Cemeteries.



Map scale 1:45,000 @ A3



# Chapter 7

## MOL Assessment Findings

**7.1** This chapter summarises the findings of the MOL assessment. The MOL assessments can be broken down into two discrete outputs:

- **Contribution** to the MOL criteria (the product of assessment step 1 in **Chapter 5**), i.e. the relative performance of the borough's MOL when rated against the four criteria for designating new MOL set out in the London Plan<sup>62</sup>.
- **Harm** to the MOL criteria associated with MOL release (the product of assessment steps 2 and 3 set out in **Chapter 5**), i.e. the impact of MOL loss, a product of the loss of MOL's contribution and the effect of release on the contribution of remaining MOL.

**7.2** **Figures 7.1, 7.2, 7.3 and 7.4** illustrate the contribution of Enfield's MOL to each of the four MOL criteria. All MOL within the borough has been assessed.

**7.3** **Figure 7.5** illustrates the harm of releasing MOL and the MOL references used to distinguish between different areas of MOL.

**7.4** The detailed judgements are set out in the assessment proforma set out in **Appendix C**. The assessment proforma include detailed judgements on variations in contribution to each MOL criterion (Step 1) and any variations in the harm of release within each area of MOL, considering the impact of release on adjacent MOL (Steps 2 and 3).

### MOL contribution

**7.5** The majority of the borough's MOL makes a strong contribution to at least one MOL criterion. Notable areas of the borough's MOL that make to the greatest contribution to the greatest number MOL criteria (three or more criteria) include<sup>63</sup>:

- Albany Park (MOL2);

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<sup>62</sup> See Policy 7.17 in the adopted London Plan and Policy G3 in the new Submission Draft London Plan.

<sup>63</sup> MOL only needs to contribute to one of the first three MOL criteria to be of value in MOL terms, criterion 4 and one of the other three criteria. It should be

noted therefore that a strong contribution to multiple MOL criteria is not necessarily more important than a strong contribution to a single criterion. However, the greater number of contributions across all four criteria, the greater the likelihood that the MOL is of notable importance/value in MOL terms.

- Queen Elizabeth Stadium (MOL4);
- Enfield Golf Course and associated woodland in World's End (MOL11);
- Portions of the MOL in and around Enfield Town Centre (MOL5, MOL6 and MOL10); and
- Southern portion of Pymmes Park associated with and in view of the historic walled garden (MOL28).

**7.6** The lowest contributing MOL within the borough makes a weak/no contribution to all MOL criteria and/or is inappropriately developed, compromising the openness and, where in close proximity to the urban edge, significantly compromises the MOL's distinction from the large built-up area. Such areas are located within:

- The designated school grounds of Lea Valley Academy and Fern House School and the southern portion of the allotments that lie between them to the west of Cobbett Close and Larmans Road (MOL1);
- The designated grounds of Ark John Keats Academy (MOL2);
- The central portions of Durants Park in between the residential estates to the north and south (notably the estates along Exeter Road and Burncroft Avenue), including the allotments off Burncroft Avenue and the designated grounds of Waverly School (MOL3);
- The allotments and open land to the east and west of Alma Road sandwiched between the Brimsdown industrial estates (MOL3);
- The designated grounds of George Spicer School and Kingsmead School (MOL4);
- The designated grounds of Houndsfield Primary School (MOL14);
- The designated grounds of Edmonton County School, the allotments to the south off Ainsley Close and, far south, the thin strip of open land in between the urban edge and the Great Cambridge Road (MOL17);
- The designated grounds of Starks Field Primary School and Churchfield Primary School, including Churchfield Recreation Ground and the large community centre and associated parking facilities to the north of the Churchfield Recreation Ground (MOL18);
- The designated grounds of Latymer School and eastern half of Church Street Recreation Ground (MOL19);
- The designated building associated with Firs Farm school (MOL20);

- The designated grounds of Firs Farm Primary School (MOL23);
- Bowes Meadow Park and associated allotments (MOL30);
- The south western corner of Tile Kiln Lane Open Space including the nursery building (MOL31);
- The designated grounds of Wilbury Primary School and the neighbouring Weir Hall Recreation Ground (MOL34); and
- The allotments west of Great Cambridge Road and just off Queensland Avenue (MOL35).

**7.7** The following sections describe the broad patterns of strategic contribution to each MOL criterion.

**Contribution to MOL criterion 1 – contribution to the physical structure of London by being clearly distinguishable from the built-up area**

**7.8** Contribution to criterion 1 is assessed by determining the relative distinction of MOL from the large built-up area of Greater London.

**7.9** The larger areas of MOL and MOL containing extensive woodland or mature treelined boundaries generally contribute strongly to criterion 1. The smaller areas of MOL and MOL adjacent to particularly visible sections of the large built-up area are more influenced by its urbanising features and therefore have less distinction from it. Consequently, these areas generally make a lower contribution to criterion 1.

**7.10** Inappropriate development within MOL generally lowers contribution to criterion 1 to weak, where it is particularly dense or contiguous with the large built-up area and therefore represents an extension of it into the MOL. Smaller, less dense and more isolated pockets of inappropriate development in the MOL, set back away or screened from the large built-up area, make a more moderate contribution to criterion 1.

**Contribution to MOL criterion 2 – presence of open-air facilities which serve either the whole of or a significant part of London**

**7.11** Only two areas of MOL within the borough are considered to contribute to criterion 2:

- Enfield Golf Course and associated woodland and neighbouring open space in World's End (MOL11); and
- Bramley Sports Ground taken together with the contiguous Oak Hill Park in the neighbouring Borough of Barnet (MOL12).

**7.12** Both areas exceed 60ha (the London Plan's area-based definition of what constitutes an open space of metropolitan significance) and contain a range open air facilities. Both areas make strong contribution to criterion 2, with the exception of a few discrete areas within them that could be released without compromising the existing range of facilities and features within the wider MOL, and without reducing the size of the MOL to below 60ha. These discrete pockets within both areas therefore make a more moderate contribution to criterion 2. However, any release in these discrete locations would need to re-provide or compensate for the loss of recreational, ecological and/or general green infrastructure functions elsewhere within the area of MOL.

**7.13** The other areas of the MOL within the borough are less than 60ha in area and therefore makes a weak/no contribution to criterion 2.

### Contribution to MOL criterion 3 – presence of features or landscapes (historic, recreational, biodiverse) of national or metropolitan value

**7.14** Contribution to criterion 3 is assessed based on the extent of influence or catchment of recorded features and landscapes of national or metropolitan value. The following national and metropolitan features influence the contribution of the following areas of MOL:

- The London Loop walking route (part of the TFL walk London Network) follows the Turkey Brook which flows along the southern edge of Belmore Fields open space (MOL1) and the northern edge of Albany Park (MOL2). The walk enjoys open views of the open space immediately north of Turkey Street (MOL1) and the playing fields and the playing ground in Albany Park, both of which make a strong contribution to criterion 3. The rest of both pockets of MOL accessible to the general public are considered to make a moderate contribution to criterion 3 by virtue of the fact that walkers along the London Loop have easy access to the facilities within them;
- The Church of St James in the north west corner of Durants Park (MOL3) is a Grade II listed building. Its listing makes no reference to its setting within the MOL. Consequently, the contribution of the MOL to the setting of this recorded historic asset (and the recorded strong contribution to criterion 3) is restricted to its immediate vicinity;
- The Queen Elizabeth Stadium Football Grounds in the north of the Enfield Playing Fields (MOL4) is a Grade II listed building. Its listing makes no reference to its setting within the MOL. Consequently, the contribution of the MOL to this asset (and the recorded strong contribution to criterion 3) is restricted to its immediate vicinity;
- The Enfield Town Conservation Area covers all or portions of a number of areas of MOL within and in the immediate vicinity of Enfield town centre (MOL5, MOL6, MOL7, MOL8, MOL9 and MOL10). In addition, the Enfield Town Conservation Area appraisal notes open southward views into Bushy Hill Park Golf Course (MOL10). These areas therefore make a strong contribution to criterion 3;
- The Grange Park Conservation Area lies directly to the west of Bushy Hill Park Golf Course (MOL10) and to the east of Enfield Golf Course (MOL11). The Grange Park Conservation Area Appraisal notes the distinctive views out of and across the Conservation Area to the tree backdrops of the golf course boundaries to the east and the west. Therefore, the woodland between the Conservation Area and these areas of MOL is considered to make a strong contribution to criterion 3. In addition, there are two scheduled monuments, one in each area of MOL:
  - Land behind the Bush Hill Golf Club (MOL10) contains the designated remains of a late Bronze Age/early Iron Age hillfort. The hillfort has been partially levelled and mutilated by the construction of the golf course. The most intact parts of the monument are located in the woodland obscured from view. Consequently, only the designated land is considered to contribute strongly to criterion 3.
  - The centre of Enfield Golf Course contains the designated remains of a medieval moated house. The house survives as earthworks and below ground remains. The most intact parts of the house are located in the woodland obscured from view. Consequently, only the designated land is considered to contribute strongly to criterion 3;
- A Grade II listed clock tower sits in the centre of Bramley Sports Ground. Its listing makes no reference to its setting within the MOL; however the lack of tree cover within the MOL offers long ranging views of the historic feature from the majority of the MOL. Therefore, the majority of the MOL makes a strong contribution to criterion 3, with the exception of the developed areas and block of woodland at the northern end;
- Grovelands Park (MOL15) is designated a Grade II\* Registered Park and Garden and contains listed buildings including the Grade I listed Grovelands Park Hospital and adjacent clusters to the east and west

associated with the neighbouring Winchmore Hill Green Conservation Area and Meadway Conservation Area. Therefore, the whole MOL is considered to make a strong contribution to criterion 3;

- The Grade II\* listed Salisbury House and associated Grade II listed wall (MOL17) are located next to Bury Lodge Gardens (MOL17). Their listings make no reference to their setting within the MOL. Consequently, the contribution of the MOL to these assets (and the recorded strong contribution to criterion 3) is restricted to their immediate vicinity;
- Broomfield Park (MOL25) is designated as a Grade II Registered Park and Garden and contains three listed buildings, including the Grade II\* listed Broomfield House. The Lakes Estate Conservation Area follows the northern and eastern boundaries of the MOL. Therefore, the whole MOL is considered to make a strong contribution to criterion 3;
- The former garden walls in the centre of the southern half of Pymmes Park (MOL28) are Grade II listed. The listing makes no reference to its setting within the MOL. Consequently, the contribution of the MOL to this asset (and the recorded strong contribution to criterion 3) is restricted to its immediate vicinity;
- The Grade II\* listed Millfield House and two associated Grade II listed buildings lie to the north east of St David's Park (MOL32). Mature trees and buildings screen the Grade II listed buildings from the view of the wider MOL; however Millfield House overlooks its grounds which are designated. Therefore, the immediate grounds of the Grade II\* listed building are considered to make a strong contribution to criterion 3; and
- The following areas of MOL do not overlap but lie in close proximity to a section of the New River designated as a Metropolitan SINC. The green spaces within these areas of MOL have the potential to be of value to the species using the SINC and are therefore recognised as making a moderate contribution to criterion 3<sup>64</sup>:
  - Paulin Ground and Winchmore Hill Cricket Club (MOL16).
  - Playing fields of Highfield Primary School (MOL21).
  - Allotments in between Palmers Green and Winchmore Hill (MOL22).

- Hazelwood Recreation Ground (MOL26).
- Oakthorpe Sports Ground (MOL29).

**7.15** The remaining areas of MOL are not considered to be influenced by or influence recorded features and landscapes of national or metropolitan value and therefore make a weak/no contribution to criterion 3.

#### Contribution to MOL criterion 4 – forms part of a network of green infrastructure and meets one of the above criteria

**7.16** The areas of MOL connected to the following known strategic corridors make a contribution to criterion 4:

- The Enfield Link following the New River connects the following areas of MOL (north to south):
  - Enfield Playing Fields (MOL4).
  - Playing fields associated with Enfield Grammar School and Enfield County Upper School and St. Andrews Churchyard (MOL5).
  - Chase Green Gardens and associated woodland (MOL6).
  - New River Gardens (MOL7).
  - Gentleman's Row open space (MOL8).
  - Enfield Library's public realm and gardens (MOL9).
  - Bush Hill Park golf course and the Town Park (MOL10).
  - Paulin Ground and Winchmore Hill Cricket Club (MOL16).
  - Playing fields of Highfield Primary School (MOL21).
  - Allotments in between Palmers Green and Winchmore Hill (MOL22).
  - Hazelwood Recreation Ground (MOL26).
  - Oakthorpe Sports Ground (MOL29);
- Pymmes Brook Link connects the following areas of MOL (west to east):
  - Arnos Park (MOL24).
  - Bowes Meadow Park (MOL30)<sup>65</sup>.
  - Tile Kiln Lane Open Space (MOL31).

<sup>64</sup> The MOL containing buildings and hardstanding associated with car parks and outdoor sports do not currently contribute; however, as areas of fundamentally open land they could reasonably be returned to green space with

green infrastructure value and have therefore not been downgraded against this criterion.

<sup>65</sup> Note: Bowes Meadow Park (MOL30) make a weak/no contribution to the other three MOL criteria. Consequently, the MOL also makes a weak/no

- Wilbury Way Open Space (MOL33).
- St David's Park and adjacent open space (MOL32).
- Pymmes Park (MOL28);
- Salmon Brook Link connects the following areas of MOL (west to east):
  - Enfield Golf Course (MOL11)
  - Bushy Hill Park Golf Course (MOL12)
  - Bury Lodge Gardens and adjacent open spaces (MOL17).
  - Churchfield Recreation Ground and adjacent open spaces (MOL18); and
- Turkey Brook Link connects the following areas of MOL (west to east):
  - Belmore Fields open space and adjacent open spaces (MOL1).
  - Albany Park and adjacent open spaces (MOL2).

**7.17** Contributions to criterion 4 across these areas of MOL correspond to the highest contribution for criteria 1, 2 and 3.

**7.18** The areas of MOL that are not connected to the above strategic corridors are considered to make a weak/no contribution to criterion 4.

## MOL harm

**7.19** Given the strong contribution of the majority of the borough's MOL to at least one of the MOL criteria, release of the majority of the borough's MOL would result in high or very high harm (in MOL terms). Notable pockets of MOL likely to generate very high harm to the MOL criteria include:

- Albany Park (MOL2);
- Queen Elizabeth Stadium (MOL4);
- Enfield Golf Course and associated woodland in World's End (MOL11);
- Portions of the MOL in and around Enfield Town Centre (MOL5, MOL6 and MOL10);
- Grovelands Park designated as a Registered Park and Garden (MOL15);
- Broomfield Park Registered Park and Garden (MOL25);

- Southern portion of Pymmes Park associated with and in view of the historic walled garden (MOL28); and
- The grounds of the Grade II\* listed Millfield House, the release of which would split the remaining MOL in two.

**7.20** Where release of areas of MOL contributing less than strongly to all MOL criteria is judged to result in the potential for an impact on the distinction of adjacent MOL, harm is increased from moderate to moderate-high or low to low-moderate, depending on the strength of contribution. For example, the following areas of MOL, found to make a weak/no contribution to all MOL criteria, were judged to result in low-moderate harm overall due to the impact of their discrete release on the distinction of adjacent MOL:

- The central portion of Durants Park connecting the woodland and allotments to the east with the wider park to the west, and the open land to the west of Alma Road, rates weakly against all MOL criteria but their isolated release would split the MOL in two, resulting in low-moderate MOL harm overall (MOL3);
- Churchfield recreation ground rates weakly against all MOL criteria but release of the western half would reduce the overall contribution of the allotments to criteria 1 and 4 from strong to moderate, resulting in low-moderate MOL harm overall (MOL18); and
- Church Street Recreation Ground rates weakly against all MOL criteria but release of the western half of the northern playing field which shares a weak western boundary with the adjacent eastern area would reduce the overall contribution of the eastern area to criterion 1 from moderate to weak, resulting in low-moderate harm overall (MOL19).

**7.21** The release of the areas of the borough's MOL containing inappropriate development in close proximity to the urban edges of large built-up area of Greater London generally result in lower MOL harm, ranging from very low to moderate depending on their level of openness, historic significance and their influence on the distinction of adjacent MOL. Notable examples include the school buildings associated with the George Spicer Primary School (MOL4) and the buildings in the northern corner of Churchfield recreation ground (MOL18), both of which would result in very low MOL harm if released.

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contribution to this criterion 4, despite being connected to the Pymmes Brook Link.

Figure 7.1 – Contribution to MOL Criterion 1 – Contribution to the physical structure of London by being clearly distinguishable from the built up area



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Contribution rating**
- Strong
- Moderate
- Weak/no



Figure 7.2 – Contribution to MOL Criterion 2 – Presence of open-air facilities which serve either the whole of or a significant part of London



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Contribution rating**
- Strong
- Moderate
- Weak/no



Map scale 1:32,000 @ A3





Figure 7.3 – contribution to MOL criterion 3 - Presence of features or landscapes of national or metropolitan value



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Contribution rating**
- Strong
- Moderate
- Weak/no

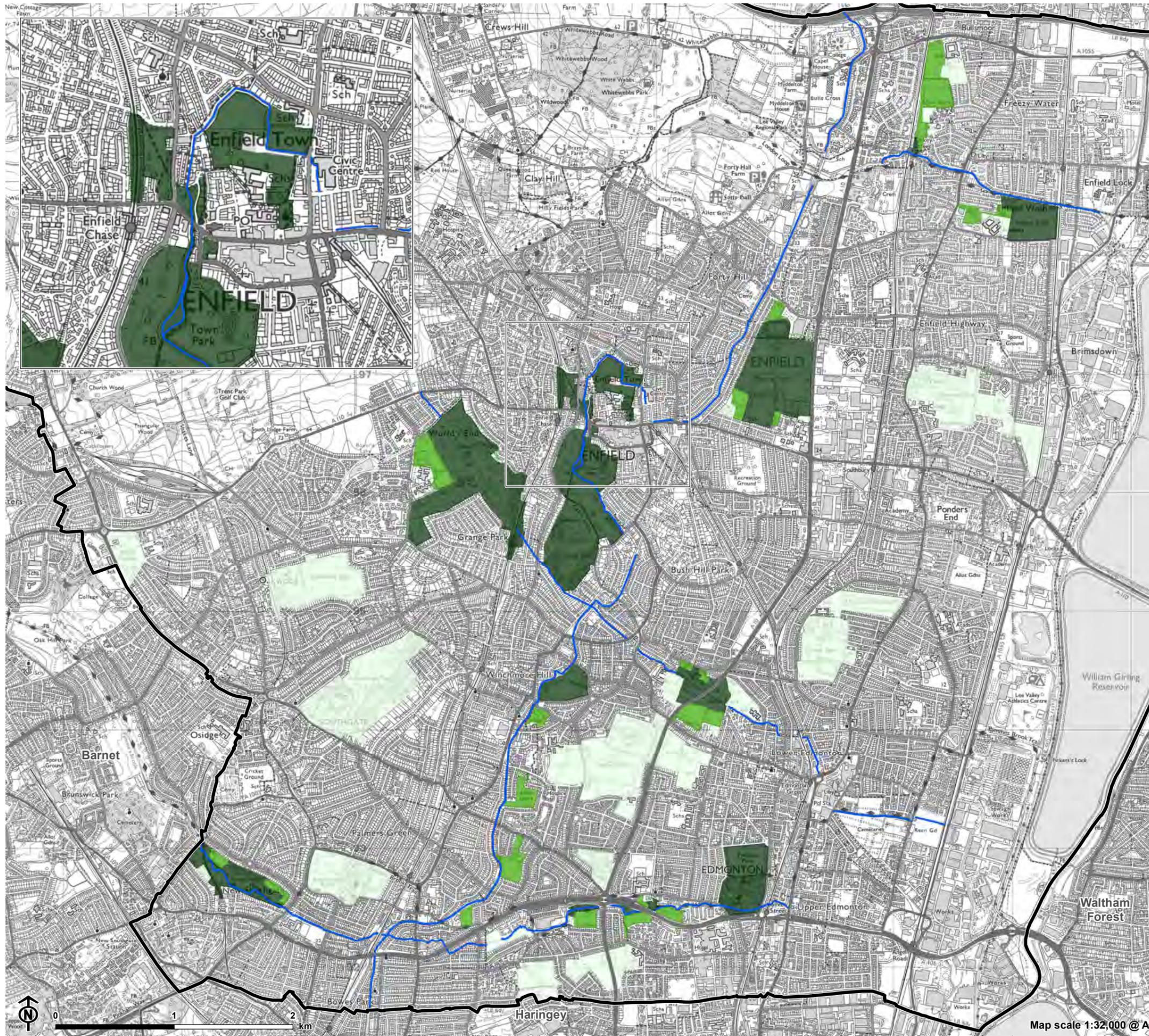


Map scale 1:32,000 @ A3





Figure 7.4 – Contribution to MOL Criterion 4 – Forms part of a network of green infrastructure and meets one of the other criteria (1, 2 or 3)



Map scale 1:32,000 @ A3





Figure 7.5 – MOL harm of releasing land from the designation



## Chapter 8

### Site Assessments

**8.1** The Council is currently considering 36 sites in the Borough's Green Belt or MOL (five MOL sites and 31 Green Belt sites) for potential allocation in the Enfield Local Plan. The sites have been organised into four categories based on the specific land uses each site is being considered for:

1. 28 sites are located in the Green Belt and are being promoted for land uses known to be inappropriate in the Green Belt, such as strategic housing, employment or mixed-use development.
2. Two sites are located in MOL and are being promoted for land uses known to be inappropriate in MOL, such as strategic housing, employment or mixed-use development.
3. Three sites are located in the Green Belt and are being promoted for land uses designed to enhance the beneficial uses of the Green Belt, such as outdoor sport, recreational, cultural and green infrastructure and associated facilities, which may or may not be appropriate in the Green Belt.
4. Three sites are located in MOL and are being considered for allocation as cemetery and/or crematorium uses, which may or may not be appropriate in MOL.

**8.2** The 28 Green Belt sites in the first category have been assessed to determine the degree of harm of their release from the Green Belt designation. The same methodology set out in **Chapter 4** and used in **Chapter 6** and **Appendix B** has been applied for this assessment. However, it differs in that it is being applied to specific isolated sites and/or combinations of clustered sites rather than all designated land in the Borough.

**8.3** The two MOL sites in the second category have been assessed to determine the harm of their release from the MOL designation. The same methodology set out in **Chapter 5** and used in **Chapter 7** and **Appendix C** has been applied for this assessment. Again, this methodology is being applied to specific site boundaries rather than the borough as a whole.

**8.4** The remaining six sites (three sites in the Green Belt and three in MOL) are being promoted for land uses which have the potential to be appropriate in the Green Belt and MOL. Consequently, these site options are not being considered for release at this time. By their very nature, appropriate land uses in the Green Belt and MOL are not considered to harm the designations; however, it is possible that some inappropriate land uses may be needed in these locations to facilitate and serve appropriate uses. Therefore, this chapter explores what promoted uses are and are not likely to be appropriate in each location and, with reference to the contribution of the land in each location to the designations' respective purposes, highlights in broad terms the potential harm of inappropriate land uses in the designations at these locations.

### Green Belt or MOL harm of releasing sites

**8.5** The locations and extent of the 30 site options that fall within categories one and two are illustrated in **Figure 8.1**. These Green Belt and MOL sites have been assessed to determine the harm to the Green Belt or MOL that would be caused by the sites' release from the designations. This work differs from the findings summarised in **Chapters 6** and **7** by reporting the harm of releasing specific isolated sites and/or combinations of clustered sites rather than the harm of releasing notable areas of strategic variation in contribution to the designations' purposes.

### Approach to defining robust site assessment areas

**8.6** Paragraph 139 of the NPPF requires plans defining new Green Belt boundaries to:

- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent; and
- not to include land which it is unnecessary to keep permanently open.

**8.7** These are important considerations in determining what land should be assessed for release within the vicinity of each site option.

**8.8** To only assess the harm of releasing the designated land within the promoted boundaries of each site would often

be to ignore the requirements of NPPF paragraph 139. This is because promoted sites are often defined based on site ownership rather than clear readily recognisable boundaries. To meet the requirement of paragraph 139, wider areas of release following clearer readily recognisable and permanent boundaries have been assessed where appropriate.

**8.9** For example, releasing site CFS135 (the blue boundary in the below image) in isolation rather than in combination with the designated land in between the site's western boundary and the urban area (the pink boundary in the below image) would arguably be contrary to the requirements of paragraph 139, particularly where the harm of releasing all land between the outer boundary of a promoted site and the existing urban area would be no higher than the release of the promoted site in isolation<sup>66</sup>.



**8.10** These are important considerations in determining which site options should be assessed for release in combination with other areas/sites, rather than in isolation.

**8.11** **Table 8.1** lists all the Green Belt and MOL sites being considered for release at this stage in the plan-making process and references whether they have been assessed in isolation and/or in combination with wider designated land/sites and why. Notable variations in the likely harm of release across each assessment area are clearly defined and described in the detailed assessment proforma in **Appendix D**, making it clear where there are notable opportunities to minimise harm spatially within each site or cluster of sites through smaller areas of release. The final column of **Table 8.1** summarises the detailed assessment findings recorded in **Appendix D**.

<sup>66</sup> Although the release of less land generally results in a lower potential for harm to the designations purposes, this is very much dependant on the

contribution of adjacent Green Belt land and the location of site options in relation to it.

Table 8.1: Green Belt and MOL harm assessment summary table

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area <sup>67</sup>
<b>Green Belt Sites</b>			
LP465 – Land between Camlet Way and Crescent West	LP465	Site is isolated, adjacent to inset urban area and has clear readily recognisable field boundaries.	Very High*
CFS155 – Junction 24, Part New Cottage and Holly Hill Farm	CFS155_ext	Site is isolated and a significant distance from the inset urban area of Hadley Wood. Site has a clear readily recognisable road and field boundaries. However, the isolated release of the site would contain a single dwelling on three sides. Given that releasing the dwelling alongside the site would create a more regular, readily recognisable boundary along the Ridgeway Road and would not be more harmful than releasing the site in isolation, the harm of releasing both the site and the dwelling has been assessed.	Very High
LP707 – Vicarage Farm, Land between Hadley Road and Enfield Road	CPC1 – Chase Park Cluster 1	The isolated release of the site would create isolated Green Belt land to the east and south of the site's boundaries. Therefore, the harm of releasing this site has only been assessed in combination with the release of the other sites to which it directly abuts: LP488, CFS162, LP642, LP623 and LP1153, and all other Green Belt land within previously assessed parcels EN12, EN13, EN15 and EN18. Furthermore, the southern boundary of LP1153 has been redefined to follow the clearer more readily recognisable edge of Bramley Road/Enfield Road (A110), incorporating the dwelling in the south western corner. The release of site LP1153 has not been assessed in isolation because it does not have a clear, readily recognisable boundary with site LP707 to the east.	Very High*
LP1153 – Bramley Road			
LP488 – Land west of The Ridgeway and Fairview Road	CPC2 – Chase Park Cluster 2	The isolated release of the site would create a narrow strip of Green Belt land to the east and south of the site's boundaries. Therefore, the harm of releasing this site has only been assessed in combination with the release of site CFS162 to the south and the Green Belt land that would be isolated directly to the east in between the site's eastern edge and the existing urban area.	Moderate*
LP10 – Chase Park	LP10_ext	<p>The isolated release of the site would create isolated Green Belt land to the south of the site's boundaries. Therefore, the harm of releasing this site has only been assessed in combination with the release of the remaining Green Belt land within previously assessed parcels EN12, EN13 and EN15 that do not fall within assessed sites LP642 and LP623. Furthermore, like the southern boundary of LP1153, the south western corner of the site has been redefined to follow the clearer more readily recognisable edge of Bramley Road/Enfield Road (A110), incorporating the dwelling in the south western corner.</p> <p>The northern boundary of the isolated northern portion of the site, in between the Ridgeway to the west and Chase Farm Hospital to the east, does not follow a clear readily recognisable boundary, i.e., it cuts through the three open fields which make up this portion of the site. However, given the close proximity of the existing field boundaries to the north west of the site boundary, it is assumed that the site's release would still result in the strengthening of this existing field boundary. Furthermore, the proposed partial release of the northern field confines containment of the adjacent Green Belt land to the east to the land immediately north of Chase Farm</p>	Very High*

<sup>67</sup> Opportunities to minimise harm in each assessment area are recorded at the end of each assessment proforma in Appendix D. Sites with notable opportunities to minimise harm are referenced with a \*.

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area <sup>67</sup>
		Hospital, which makes a lower contribution to the Green Belt purposes the land to the north.	
CFS162 – 66 Ridgeway	CFS162	Site is adjacent to inset urban area and has clear readily recognisable field boundaries.	Low-Moderate
LP642 – Land opposite Jolly Farmers	LP642_ext	The isolated release of the site would create a narrower strip of Green Belt land to the west of the site's boundaries, containing Green Belt land which makes a weaker contribution to the Green Belt purposes. Given that releasing all the land within previously assessed parcel EN15 would create a more regular, readily recognisable boundary and would not be more harmful than releasing the site LP642 in isolation, the harm of releasing both areas has been assessed in combination.	Low-Moderate*
LP623 – Land south of Enfield Road	LP623_ext	The release of site LP623 in isolation would leave a thin strip of Green Belt land to the west south of Enfield Road. Given that releasing all the land within previously assessed parcel EN13 would create a more regular, readily recognisable boundary and would not be more harmful than releasing the site LP642 in isolation, the harm of releasing both areas has been assessed in combination.	Low-Moderate
LP107 – Burnt Farm Ride	CHC1 – Crews Hill Cluster 1	The isolated release of this site would create a new inset area and isolate two pockets of Green Belt in the centre of the site from the wide Green Belt. Furthermore, it would create a large urban area in close proximity to the existing urban areas of Crews Hill to the south and west, some of which are washed over by the Green Belt designation and one area inset within it. The majority of the land in between the site and the inset urban area of Crews Hill has already been developed and includes several other promoted sites on Green Belt land judged to make a lower contribution to the Green Belt purposes. Therefore, the harm of releasing this site has only been assessed in combination with the release of sites LP056, LP031, LP179, CFS159, LP645, LP649 and CFS132, and all the Green Belt land directly between this distinct cluster of sites. The boundaries of this area follow clear, readily recognisable boundaries, such as Cuffley Brook to the east, wooded field boundaries to the east and the inset urban area of Crews Hill to the south.	Very High*
LP179 – Oak Farm and Homestead Nursery, Cattlegate Road	CHC2 – Crews Hill Cluster 2	The isolated release of these two neighbouring sites (collectively or separately) would create an new inset area in relative close proximity to the existing urban areas of Crews Hill to the south, east and west, some of which are washed over by the Green Belt designation and one area inset within it. The majority of the land in between the sites and the inset urban area of Crews Hill has already been developed and includes three other promoted sites judged to make a lower contribution to the Green Belt purposes. Therefore, the harm of releasing these two neighbouring sites has only been assessed in combination with the release of sites LP056, LP031, LP179 and LP645 and all the Green Belt land directly between them. The boundaries of this site cluster in between the promoted site boundaries follow readily recognisable boundaries, such as field boundaries to the north, woodland to the west, the inset urban area of Crews Hill to the south and a road to the east.	Low*
CFS159 – Wyevale Garden Centre, Cattlegate Road			
LP056 – Wolden Garden Centre, Cattlegate Road	CHC3 – Crews Hill Cluster 3	The isolated release of these three neighbouring sites (collectively or separately) would contain the developed Green Belt land between them. Therefore, the harm of releasing these three sites has only been assessed in combination with the release of the Green Belt land directly between them south of Cattlegate Road, which forms a clear readily recognisable northern boundary alongside the woodland to the west, the inset urban area of Crews Hill to the south and the road to the east.	Very Low
LP031 – Warmerdams Nursery, Cattlegate Road			

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area <sup>67</sup>
LP645 – Towneley Nurseries, Theobalds Park Road			
LP649 – Brown's Garden Village, Theobalds Park Road	CHC4 – Crews Hill Cluster 4	The release of these two neighbouring sites would represent an eastward expansion of the existing inset urban area of Crews Hill east of Theobalds Park Road. The boundaries of the southern site (CFS132) are relatively clear being formed of treelined property boundaries to the south and east and Whitewebbs Road to the north. However, the northern boundary of the northern site (LP649) is less clear and permanent, being formed of an open car park. Therefore, the northern and eastern boundaries of site LP649 have been extended to incorporate the built development to the north associated with Jollyes Petfood Superstore. This eastward expansion of Crews Hill would contain the lower performing Green Belt to the west of Theobalds Park Road and south of Cattlegate Road. It has therefore been assumed that the release of sites LP649 and CFS132 would also include the release of sites LP056, LP031 and LP645 and the land in between them.	Low
CFS132 – Land at 135 Theobalds Park Road			
CFS169 – Kings Oak Equestrian Centre	CFS169	Site is isolated to the south of Crews Hill, is adjacent to inset urban area and has clear readily recognisable woodland and building boundaries.	Low
LP9 – Crews Hill	LP9_ext	The isolated release of this site would contain the Cuffley Brook waterbody surrounded by the Whitewebbs Park woodland at the eastern edge of the site. Therefore, the harm of releasing this site has only been assessed in combination with the release of this waterbody up to the main wooded edge of the Whitewebbs Park. The boundaries of this area follow the clearer, readily recognisable boundary of the outer edge of the Cuffley Brook and the Whitewebbs Park ancient woodland directly to the north east.	Very High*
LP637 – Land north of Goat Lane	LP637_ext	The isolated release of the site would create a thin strip of contained Green Belt land in between the site's eastern edge and the existing urban area to the east. Therefore, the harm of releasing this site has only been assessed in combination with the thin strip of land to the east, creating a clearer Green Belt boundary.	Low-Moderate
LP1138 – Land opposite Enfield Crematorium (aka The Dell), Great Cambridge Road	LP1138	Site is isolated, adjacent to inset urban area and has clear readily recognisable woodland and road boundaries.	Moderate
LP472a – Land to the rear of Jesus Christ Church	FHC1 – Forty Hill Cluster 1	The isolated release of the site would create a new inset area within the Green Belt very close to the existing urban edge. Its isolated release would also increase the containment of two adjacent areas of Green Belt, specifically, sites LP472b and LP1138 to the east and the land directly to the south in between the large buildings along Forty Hill Road and the existing urban area, containing the Clockhouse Nursery, Worcesters Primary School, the allotments of Goat Lane and site LP637. Therefore, the harm of releasing this site has only been assessed in combination with the release of sites LP472b and LP1138 to the east and all the land to the south in between the site, Forty Hill Road and the existing urban edge. Furthermore, the western edge of site LP472a has been extended to	High

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area <sup>67</sup>
		incorporate Jesus Christ Church and create a clearer, readily recognisable western Green Belt boundary along Forty Hill Road.	
LP472b – Land to the rear of Forty Hill Church of England School	FHC2 – Forty Hill Cluster 2	The isolated release of the site would create a new inset area within the Green Belt very close to the existing urban edge. Its isolated release would also increase the containment of two adjacent areas of Green Belt judged to make a lower contribution to the Green Belt purposes, specifically site LP1138 to the east and the land directly to the south containing the Clockhouse Nursery, site LP637 and the allotments off Goat Lane. Therefore, the harm of releasing this site has only been assessed in combination with the release of site LP1138 to the east, the majority of the Clockhouse Nursery directly to the south and the land beyond in between Worcesters Primary School buildings and the existing urban edge, including site LP637 and the allotments of Goat Lane. Furthermore, the northern edge of site LP472b has been extended to incorporate Forty Hill Church of England Primary School and create a more consistent northern Green Belt boundary along Forty Hill Road and the wooded footpath south of Turkey Brook.	High
LP606 – Rammey Marsh, Mollison Avenue	IBPC1 – Innova Business Park Cluster 1	The isolated release of this site would result in a thin strip of Green Belt land to the south of Mollison Avenue and to the north along the M25. Therefore, the harm of releasing site LP6060 has only been assessed in combination with the release of the land directly to the north and south in between the sites and in between the existing urban area, which includes site CFS148. The Small River Lee to the east represents a clear readily recognisable boundary that aligns neatly with Mollison Avenue to the south. The release of site CFS148 in isolated is assessed as an opportunity to minimise harm to low.	Low-Moderate*
CFS148 – Land to north west of Innova Park			
CFS135 – Navigation Park Carpark	CFS135_ext	The isolated release of the site would create a thin strip of contained Green Belt land in between the site's western edge and the existing urban area to the east. This strip only covers a section of open water on the River Lee Navigation and therefore is highly unlikely to be developed. However, in the interests of creating a clear, readily recognisable Green Belt boundary it would make sense to release this small section in combination with the site. Therefore, the harm of releasing this site has only been assessed in combination with the thin strip of the River Lee Navigation to the west. The eastern and southern boundaries are also formed of channels of the River Lee Navigation, representing clear and readily recognisable alternative Green Belt boundaries.	Moderate
LP675 – Land at Picketts Lock	LP675_ext	Site is isolated and adjacent to inset urban area and has clear, readily recognisable boundaries to the north and south. However, the eastern boundary of the site cuts through the Lee Valley Athletics Centre. This eastern boundary has therefore been extended to incorporate the whole building.	Low-Moderate
LP605 – Land at Harbert Road	LP605_ext	The isolated release of the site would create a thin strip of contained Green Belt land in between the two pockets of the site. Furthermore, two thin strips of Green Belt would remain, contained in between the released sites and the existing urban area. Therefore, the harm of releasing this site has only been assessed in combination with the thin strips of Green Belt land in between the site pockets and in between the site's western edge and the existing urban area.	Moderate*
<b>MOL Sites</b>			

Site Reference and Location	Assessment Reference	Assessment Area Justification	Harm of Releasing Whole Assessment Area <sup>67</sup>
LP1196 – Land at former Wessex Hall Building	LP1196_ext	<p>Site is isolated and adjacent to inset urban area. It does not have a clear readily recognisable boundary at its eastern edge with the wider MOL; however, this edge is consistent with the existing urban edge to the north and south and so forms a clear alternative boundary.</p> <p>The southern edge of the site would create a thin strip of MOL land in between the site's southern boundary and the existing urban edge. Therefore, the harm of releasing this site has only been assessed in combination with the thin strip to the south in between the site's southern edge and the existing urban area.</p>	Low
CFS207 – Albany Leisure Centre and Car Park, 55 Albany Road	CFS207	Site is isolated, adjacent to inset urban area and has clear readily recognisable footpath boundary with the wider MOL.	Low



## Other promoted uses which may or may not be appropriate in the Green Belt or MOL

**8.12** Paragraph 138 of the NPPF states that local planning authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Furthermore, paragraph 141 of the NPPF states local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. These requirements are supported by additional planning practice guidance which emphasises the need for Local Plans to include policies for compensatory improvements to the environmental quality and accessibility of the Green Belt. The PPG highlights the need for these improvements to be informed by appropriate evidence on issues such as green infrastructure, woodland planting, landscape, biodiversity, habitat connectivity and natural capital, access and recreation. Similarly, the supporting text to the New London Plan MOL Policy G3 states that proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged.

**8.13** It is therefore important that the borough considers where and how the borough's Green Belt and MOL can be enhanced, particularly the relationship between the borough's preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses.

**8.14** Table 8.2 names the six remaining site options, all of which are being promoted for land uses which may be appropriate in the Green Belt or MOL, and which may provide opportunities to enhance and/or diversify the beneficial uses of the designations. Figure 8.2 illustrates the locations and extent of these site options.

**Table 8.2: Green Belt and MOL promoted for potential beneficial uses**

Site Reference and Location	Promoted Uses
<b>Green Belt Sites</b>	
CFS161 – Whitewebbs Golf Course, Beggar's Hollow	Green and blue infrastructure enhancements, incorporating sport or leisure uses.
CFS171 – Sloemans Farm	Green and blue infrastructure enhancements, incorporating sport or leisure uses.  Woodland burial cemetery.

Site Reference and Location	Promoted Uses
	Café, community facilities and visitor parking.
CFS218 – Tottenham Hotspur Football Club Training Ground	Sport or leisure uses.
<b>MOL Sites</b>	
CFS167 – Alma Road Open Space	Cemetery and/or crematorium uses.
CFS168 – Firs Farm Recreation Ground (Part)	
CFS230 – Church Street Recreation Ground	

**8.15** The majority of the promoted land uses at these six sites are likely to be appropriate in the designations and therefore not harmful to the openness and purposes of the designations. However, in the event that inappropriate forms of the promoted land uses are planned, the remainder of this chapter focusses on answering two questions:

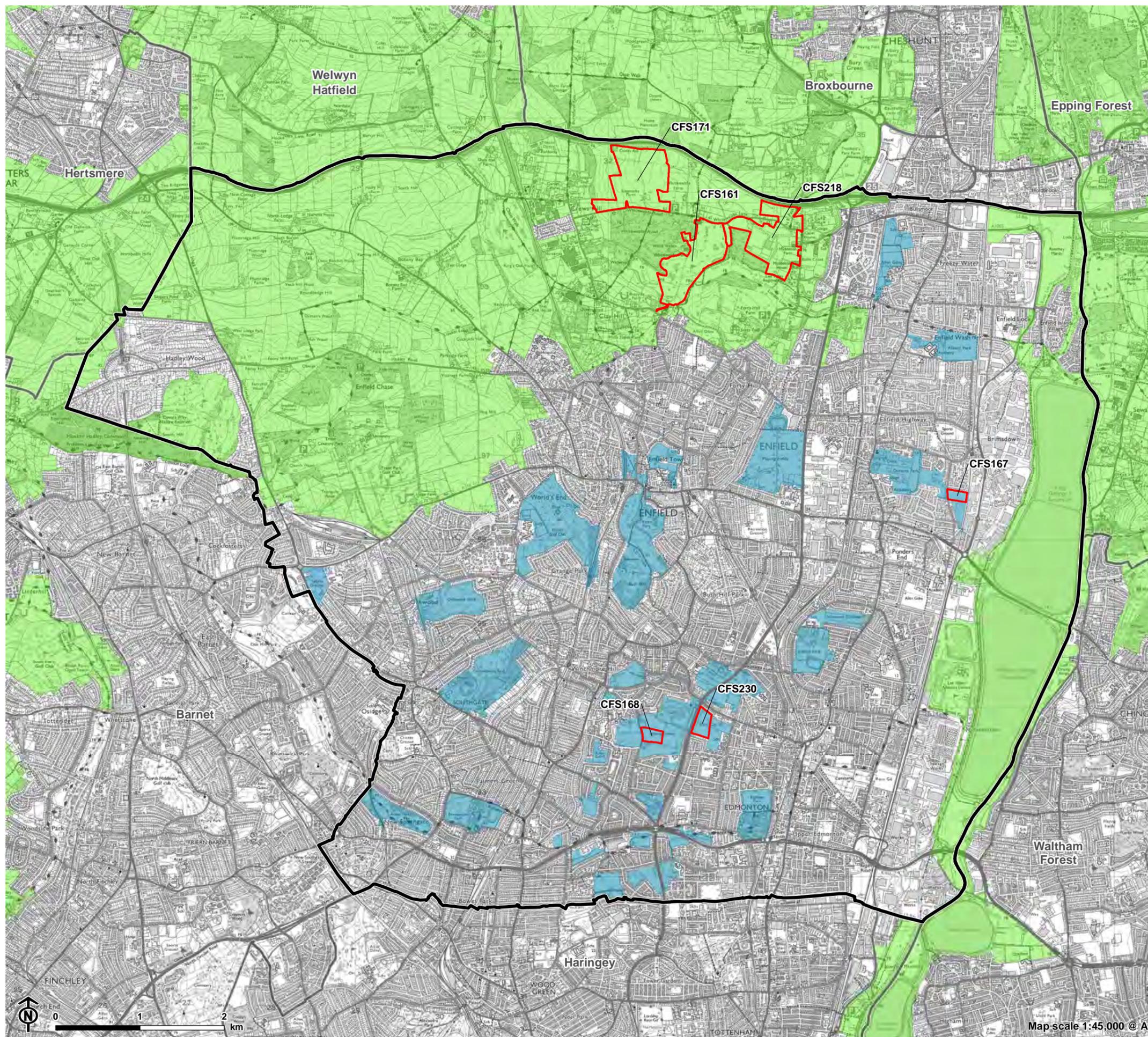
- What is and is not appropriate in the designations for each type of promoted use?
- How could Green Belt and MOL harm be minimised by limiting inappropriate development within specific parts of each site?

### Appropriateness of the promoted uses

**8.16** NPPF paragraph 145 lists the exceptions to the general rule that new buildings are inappropriate in the Green Belt. Exceptional buildings which may be relevant to the six remaining sites include:

- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

Figure 8.2: Green Belt and MOL Sites Being Considered for Potential Beneficial Uses



- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Belt
- MOL
- Site boundary

Map scale 1:45,000 @ A3

**8.17** NPPF paragraph 146 lists certain other forms of development that are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. Other land uses (other than buildings) deemed to be not inappropriate which may be relevant to the six remaining sites include:

- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction; and
- material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds).

**8.18** In judging whether promoted uses preserve the openness of the Green Belt, NPPG offers some guidance on some of the matters to consider:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

**8.19** Paragraph 5.7.4 in the adopted London Plan (2021) reiterates this national Green Belt policy and confirms it also applies to MOL.

#### Green and blue infrastructure enhancements

**8.20** Green and blue infrastructure enhancements generally do not require a material change in land use beyond any potential to restore or remediate previously developed land or new buildings. They preserve and could even potentially enhance the openness of the designations and are compatible with the purposes of the designations. Consequently, such uses are considered to be appropriate and therefore not harmful to the designations.

#### Outdoor leisure uses and associated facilities

**8.21** Promoted outdoor leisure and potential associated facilities, such as cafes or community buildings are likely to be appropriate in the designations as long as they only include:

- material changes in land use for outdoor sport or recreation that preserve openness and do not conflict

with the purposes of including land within the designations;

- new buildings that only support outdoor recreation, preserve openness and do not conflict with the purposes of including land within the designations;
- new buildings/uses as proportionate extensions or alterations to existing buildings;
- new buildings replacing existing buildings of the same use and are no larger; and/or
- the re-use of permanent buildings with land uses that preserve openness and do not conflict with the purposes of including land within the designations.

**8.22** New outdoor leisure uses and associated facilities cover a broad range of potential developments – too many to consider in any detail in this report. Outdoor recreation facilities, such as grass playing fields, footpaths and cycle paths and picnic areas, without above ground buildings and infrastructure would not impact the spatial openness of the designations.

**8.23** New buildings supporting such uses, such as cafes, toilets and other community facilities, are likely to impact the spatial openness of the designations unless such uses already exist in the designations and can just be improved without an increase in their overall footprint and mass or can be incorporated within existing buildings, or as proportionate extensions and alterations to existing buildings.

**8.24** In the absence of any material change in the spatial openness of the designations, the visual openness of the designations could still be affected by the degree of activity generated/facilitated by new and improved facilities. Therefore, the operational hours, screening and ancillary infrastructure associated with any such facilities will be important material considerations in evaluating their appropriateness and potential impact of the designations' openness.

#### Visitor parking

**8.25** New transport infrastructure, such as car parks, road infrastructure and cycling facilities, that preserve openness and do not conflict with the purposes of including land within the designations are appropriate.

**8.26** Parking facilities without above ground buildings and infrastructure would not impact the spatial openness of the designations; however, visual openness could be affected by the degree of activity generated/facilitated by such facilities. The scale/capacity, operational hours, screening and ancillary infrastructure associated with visitor parking are all factors that

need to be considered in judging the effect of such land uses on the designations openness.

### Cemeteries and crematoria

**8.27** The question of whether cemetery and burial ground uses are appropriate in Green Belts, and by extension MOL, has been a topic of regular legal debate since the publication of the NPPF in 2012.

**8.28** In 2015, case law set by *Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited* (2015) found the wording of the NPPF (2012) to mean the development of new cemeteries in Green Belt were inappropriate. The publication of a revised NPPF in July 2018 changed this however, confirming that material changes in the use to cemeteries and burial grounds were not inappropriate provided they preserve the Green Belt's openness and do not conflict with the purposes of including land within it.

**8.29** Consequently, lawn grave cemeteries, free from buildings are appropriate regardless of the performance of the designations; however, cemeteries containing more built development, such as Mausoleums, vaults or crematoria, may be found to be inappropriate if such buildings are judged to compromise openness.

**8.30** In light of the judgement in *Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd* (2016) it is generally accepted that for development found to be appropriate in principle, the question of its impact on openness is no longer an issue. Consequently, Mausoleums, vaults or crematoria as proportionate extensions or alterations to existing buildings may be found to be appropriate in the designations. This was found to be the case in the recent appeal decision to allow planning permission for a single storey extension to an existing chapel building in the Green Belt to provide a crematorium at Bluebell Cemetery, Badgers Mount in Sevenoaks District, Kent.<sup>68</sup>

**8.31** In the absence of any existing buildings suitable for proportionate extension or alteration, Mausoleums, vaults or crematoria buildings are likely to be inappropriate and, by definition, harmful to the designations.

### Very special circumstances

**8.32** NPPF paragraph 144 states that inappropriate Green Belt and MOL uses can only be permitted in very special circumstances when Green Belt and/or MOL harm, and any other harm, is clearly outweighed by other considerations.

The need for such uses in the designations, as a result of an overall shortage of such facilities, can be used as part of such a case. For example need was used to justify the approval of a crematorium in Staffordshire in the West Midlands Green Belt.<sup>69</sup>; however, the merits of such a case will depend on the planning balance with Green Belt/MOL harm.

**8.33** The following sections assess the likely harm of inappropriate promoted land uses in each of the site locations and highlight spatial opportunities to minimise harm in these locations.

### Potential Green Belt harm of promoted land uses at Whitewebbs Golf Course (CFS161)

**8.34** The site comprises the Whitewebbs Golf Course and some of its associated buildings. This Green Belt land generally makes a strong contribution to two of the Green Belt purposes (purposes 3 and 5) and a relatively strong contribution to purpose 1. The southern portion of the site makes a strong contribution to purposes 1 and 4 because it is much closer to the existing large built up area of London, including the historic areas of Clay Hill and Forty Hill. Consequently, inappropriate development within the site has the potential to generate **Very High** Green Belt harm (see **Chapter 6** for further details).

**8.35** The vast majority of the site is covered by the golf course, is free from buildings and is fundamentally open. Therefore, the majority of the site offers little opportunity to accommodate new buildings and above ground infrastructure without affecting openness. Appropriate open uses would be best located across these portions of the site.

**8.36** The two clusters of permanent buildings located at the southern end and north western corner of the site represent the best locations for new built development associated with new or improved leisure uses in the Green Belt. Harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small 'proportionate' extensions to them.

### Potential Green Belt harm of promoted land uses at Sloemans Farm (CFS171)

**8.37** The site is comprised of open agricultural fields in between the wooded Whitewebbs Park to the south and the M25 to the north. To the west, beyond the treelined Cuffley Brook, lies Crews Hill. This Green Belt land generally makes a strong contribution to two of the Green Belt purposes

<sup>68</sup> Appeal Ref: APP/G2245/W/19/3243177 Bluebell Cemetery, Watercroft Woods, Old London Road, Badgers Mount TN14 7AE. Inspector : Rachael Pipkin BA (Hons) MPhil MRTPI 27 January 2021

<sup>69</sup> Appeal Ref: APP/C3430/W/15/3039129 (Appeal A) and 3039163 (Appeal B) Land adjacent to Holyhead Road, Wergs, Staffordshire WV8 2HF (Appeal A) Broad Lane, Essington WV11 2RJ (Appeal B) Inspector: David Nicholson RIBA IHBC 13 May 2019

(purposes 3 and 5) and a relatively strong contribution to purpose 1. Consequently, inappropriate development within the site has the potential to generate **Very High** Green Belt harm (see **Chapter 6** for further details).

**8.38** The site contains no existing buildings and is fundamentally open, offering very limited opportunity to accommodate new buildings and above ground infrastructure without affecting openness. Appropriate open uses would be best located across the entirety of the site.

#### Potential Green Belt harm of promoted land uses at Tottenham Hotspur Football Club Training Ground (CFS218)

**8.39** Inappropriate development within the site has the potential to generate **Very High** Green Belt harm (see **Chapters 6 and 8** in the main report for further details).

**8.40** The large permanent building located in the centre of the site and the smaller clusters of buildings at the southern and eastern edges of the site represent the best locations for new built development associated with new or improved sport and leisure uses in the Green Belt. Harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small 'proportionate' extensions to them.

#### Potential MOL harm of inappropriate development at Alma Road Open Space (CFS167)

**8.41** The site is located on MOL land to the east of Alma Road (MOL3). This MOL is considered to make a weak contribution to all four MOL criteria. Therefore, the harm of inappropriate development in this location is considered to be **Low** when compared to other MOL locations in the Borough (see **Chapter 7** and **Appendix C** for further details).

**8.42** The site contains no existing buildings and is fundamentally open, connecting the allotments to the south with the wider MOL to the west. Therefore, appropriate open cemetery uses would be best located in the south and western portions of the site so as to maintain openness between connectivity between the Alma Road Allotments to the south and Durants Park to the west.

**8.43** The harm of inappropriate development would be minimised in the north eastern corner of the site, adjacent to the existing built-up area.

#### Potential MOL harm of inappropriate development at Firs Farm Recreation Ground (CFS168)

**8.44** The site is located on MOL land at Firs Farm Sports Ground (MOL20). This MOL is considered to make a strong

contribution to MOL criterion 1 by virtue of being clearly distinguishable from the built-up area. Therefore, the harm of inappropriate development in this location is considered to be **High** when compared to other MOL locations in the Borough (see **Chapter 7** and **Appendix C** for further details).

**8.45** The site contains no existing buildings and is fundamentally open. Appropriate open cemetery uses would be best located across the entirety of the site, given its central location in the pocket of MOL.

**8.46** The harm of inappropriate development would be minimised in the western end of the site where the mature wood to the north and south and the mature tree line to the west would screen views most effectively. Furthermore, Firs Lane and the car park to the south may provide sufficient access and parking facility so as to limit further need for hardstanding elsewhere on the site.

#### Potential MOL harm of inappropriate development at Church Street Recreation Ground (CFS230)

**8.47** The site is located on MOL to the east of Great Cambridge Road on Church Street Recreation Ground (MOL19). This MOL is considered to make a moderate contribution to MOL criterion 1. Although the residential gardens to the north and south offer clear views of the built-up area, the open views of the MOL limit their influence. Furthermore, the strong treelines to the west and south limit influences of the built-up areas in these directions. Therefore, the harm of inappropriate development in this location is considered to be **Moderate** when compared to other MOL locations in the Borough (see **Chapter 7** and **Appendix C** for further details).

**8.48** The site contains no existing buildings and is fundamentally open. Although Great Cambridge Road maintains separation between Church Street Recreation Ground and Edmonton Cemetery to the west, minimal built development between the two increases the value of the MOL within the site in maintaining a continuous band of open land between the two. Therefore, appropriate open cemetery uses would be best located across the entirety of the site.

**8.49** The harm of inappropriate development would be minimised at the southern end of the site adjacent to the existing built-up area where the mature tree lines to the east and west would screen views most effectively.

# Chapter 9

## Next Steps

### Exceptional circumstances

**9.1** This study will be used by Enfield Council alongside other pieces of evidence to establish the necessary exceptional circumstances for making alterations to the designations' boundaries (if required) and then identify preferred site options and reasonable alternatives for release within the designations. Once a preferred spatial strategy has been identified, consideration can be given to the harm of releasing the specific boundaries of the sites identified for allocation in combination (if necessary).

**9.2** In the meantime, Green Belt and MOL sites put forward in response to the borough's Call for Sites carried out to inform the separate Enfield Capacity Study and found to be suitable, available and achievable through the Borough's Housing and Employment Land Availability Assessment (HELAA) have been overlaid with the variations in harm identified in this study to provide an indication of the likely harm of releasing the known site options.

### Enhancement of Green Belt and MOL

**9.3** The borough's evidence base covering green and blue infrastructure, open spaces, sport and recreation, ecology, landscape and townscape, climate change and flood risk and the historic environment can all inform policy on where and how the borough's Green Belt and MOL may be enhanced over the Plan period and beyond. **Table 9.1** below sets out some general beneficial uses that could be enhanced in the Green Belt and MOL, alongside the general planning issues that will need to be considered in defining appropriate projects.

Table 9.1: Potential beneficial uses of Green Belt and MOL

Beneficial use	Considerations in practice
<b>Improving access</b>	Enhancing the coverage and condition of the right of way network and increasing open space provision.
<b>Providing locations for outdoor sport</b>	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is thus less likely to harm Green Belt/MOL.

Beneficial use	Considerations in practice
<b>Landscape and visual enhancement</b>	Using landscape/historic character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced and reinterpreted.
<b>Historic environment enhancement and interpretation</b>	

Beneficial use	Considerations in practice
<b>Increasing biodiversity</b>	Most Green Belt land / MOL has potential for increased biodiversity value, e.g. the management of hedgerows and agricultural field margins, the restoration of habitats and provision of habitat connectivity, including but not limited to the planting of woodland. There may also be opportunities to link enhancements with policy requirements to deliver 'biodiversity net gain' associated with development proposals.
<b>Climate change mitigation and adaptation</b>	Tree planting and re-wilding projects can create new carbon sinks. Furthermore, increasing the density and biodiversity of the Borough's flora can combat the urban heat island effect of the large built up areas and flood risk.
<b>Improving damaged and derelict land</b>	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to the characteristics / qualities which help it contribute to Green Belt purposes / MOL criteria.

harm in **Chapters 6 and 7**, there is the potential to reduce the harm of release by implementing additional mitigation measures associated with the design, density and landscaping of development. In the absence of detailed preferred site options at this stage in the plan-making process, detailed recommendations on potential additional mitigation measures to reduce harm to the designations cannot be reasonably made in this study.

**9.5 Table 9.2** below, however, sets out some general mitigation measures that could in principle be used to reduce or avoid Green Belt and MOL harm. Consideration should be given to these measures in the drafting of policies for site allocations involving designation release, in evaluating the deliverability and viability of site allocations involving release and in determining planning applications within the designations.

**9.6** As mentioned above, the London Borough of Enfield and site developers should look for appropriate synergies between such mitigation measures and opportunities to enhance the beneficial uses of the designations (see **Table 8.1**).

## Mitigation measures to reduce Green Belt and MOL harm

**9.4** In addition to avoiding the release of areas identified as having the potential to generate higher Green Belt and MOL

*Table 9.2 Potential measures to mitigate harm to Green Belt land / MOL*

Mitigation measure	Benefits	Considerations
Use landscape treatment to help integrate a new designation boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining sense of separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of perceptual 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for loss of distinction.	The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function.
Define urban edges using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within designations (e.g. major roads and railways).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents. Sensitive design is therefore needed.

Mitigation measure	Benefits	Considerations
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing urban densities and/or making the most efficient use of land.
Consider ownership and management of landscape elements which contribute to Green Belt purposes / MOL criteria.	Ensuring permanence of designations.	Trees and hedgerows require management to maintain their value in Green Belt / MOL terms, and the visual screening value that can be attributed to them is more limited if they are under private control and/or multiple ownership (e.g. within back gardens).
Enhance visual openness within the designations.	Increasing perception of countryside.	Although openness in a Green Belt / MOL sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Enhance access to and within the designations.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the designations' boundaries to strengthen their role.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit in this regard.
Maintain/create separation between existing washed-over development and new inset urban areas.	Minimising urbanising influences that could weaken the justification for retaining the washed-over development's status.	Ensure that the gap is sufficiently wide to maintain a sense of separation.
Design access road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation, but new development often needs sustainable access

Mitigation measure	Benefits	Considerations
		and movement routes to be created or enhanced..
Use sustainable drainage features to define/enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

**9.7** The above mitigation or enhancement measures could apply equally either to land being released from or land being retained within the designations.

### Designation of new MOL

**9.8** It is recommended that opportunities for the designation of new MOL are explored in further detail following the completion of the borough's Green and Blue Infrastructure and Open Space Strategy work and associated evidence bases covering on the Borough's open spaces, sport and recreation, ecology, landscape and townscape, climate change and flood risk and the historic environment.