

London Borough of Enfield

# Green Belt and Metropolitan Open Land Study

## Executive Summary

June 2021

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# **Chapter 1**

## **Executive Summary**

### **Introduction**

**1.1** This represents an executive summary to the Enfield Green Belt and Metropolitan Open land (MOL) Study Final Report prepared in August 2020.

### **Study objectives**

**1.2** The study represents an independent, robust and transparent assessment of all Green Belt land and MOL within the borough in line with national policy, guidance and case law, specifically 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):
  - 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.
- MOL to the four criteria for designating new MOL, set out in the London Plan:
  - Contributes to the physical structure of London by being clearly distinguishable from the built-up area;
  - 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;

- Contains features or landscapes of either national or metropolitan value; and<sup>1</sup>
- Forms part of a Green Chain or link in the network of green infrastructure and meets one of the above criteria.<sup>2</sup>

**1.3** The study also assesses the potential harm to the designations if any land were to be de-designated through the Local Plan process. These variations in the potential harm release to the designations has been used to establish the harm of releasing specific site options.

**1.4** Finally, consideration is also given to the accuracy and robustness of the Council's existing Green Belt and MOL boundaries, with a view to recommending appropriate realignments along alternative permanent and readily recognisable physical features where necessary.

**1.5** These judgements 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 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, and the deliverability of preferred site options as determined through Whole Plan viability testing.

## Green Belt assessment methodology

**1.6** The following important Green Belt policy terms have been applied to the study area as follows:

- Large Built-up area: Greater London.
- Town: Greater London, Potters Bar, Waltham Abbey.
- Historic town: Greater London.

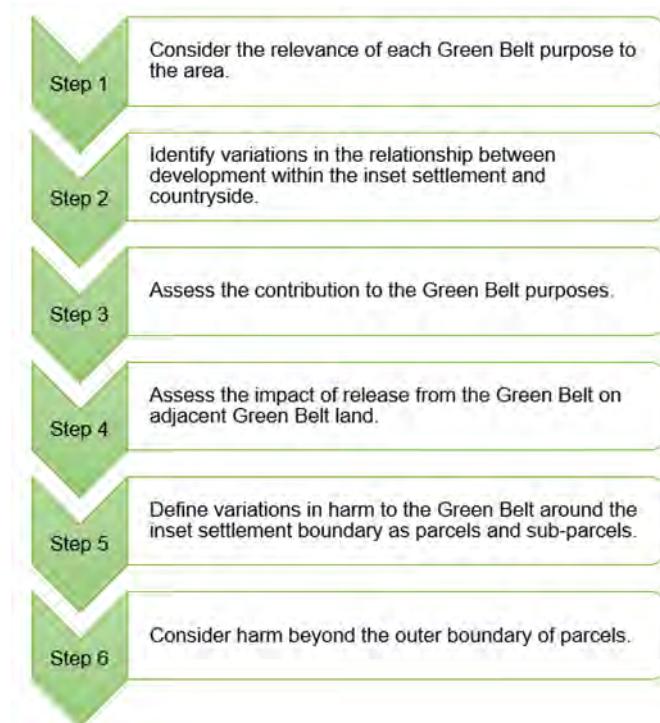
**1.7** The contribution of all Green Belt land to the five Green Belt purposes has been assessed, but areas of Green Belt within which development would not be permitted due the presence of certain 'absolute' constraints have not been assigned a Green Belt harm rating associated with release. Notable absolute constraints excluded from harm assessment include:

- 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.

**1.8** The harm of Green Belt release (in Green Belt terms) has been assessed moving out from the inset edges of Greater London (including Hadley Wood) and Crews Hill. Harm typically increases with distance from these settlement edges as the area of release grows in scale.

**1.9** The Green Belt assessment process is split into six steps as shown below:



**1.10** Professional judgement is used at each step, but detailed justification is provided for all ratings given in the detailed parcel assessment reports.<sup>3</sup> The considerations

<sup>1</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>2</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.

<sup>3</sup> Note: Detailed assessment parcels have only been defined immediately adjacent to the inset urban areas of Greater London and Crews Hill up to a point beyond which release out from the inset urban edge is considered to result in high or very high Green Belt harm.

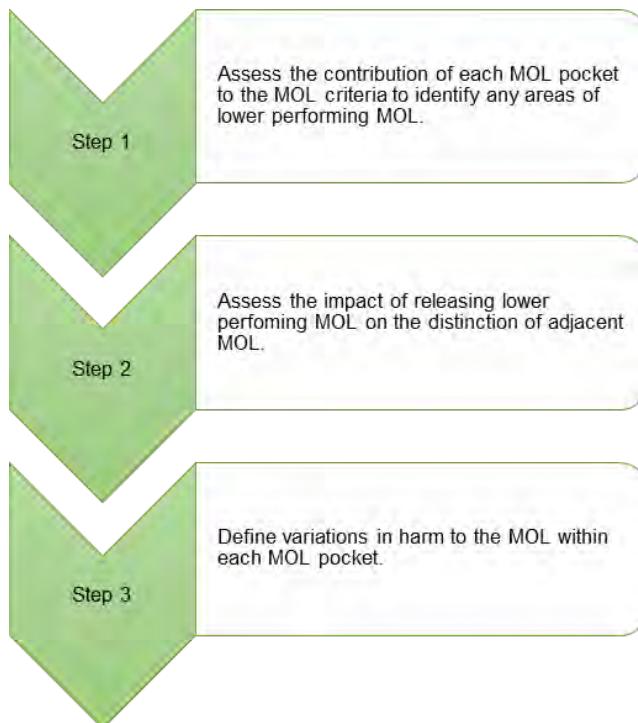
informing judgements on Green Belt contribution and harm are referenced in the Green Belt findings section below.

**1.11** Strategic variations in the harm of Green Belt release are defined by parcels, although sub-parcels are sometimes defined within parcels where there are notable opportunities to potentially reduce harm to the Green Belt purposes through the release of only part of a parcel.

## MOL assessment methodology

**1.12** The contribution of all MOL to the four criteria for designating new MOL has been assessed. Similarly, all MOL has been assigned an MOL harm rating judging the harm of its release from the designation (in MOL terms). No absolute constraints have been excluded for the MOL harm assessment. This is because MOL criterion 3 requires consideration of the presence of features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value. The considerations informing judgements on MOL contribution and harm are referenced in the MOL findings section below.

**1.13** Each discrete area of MOL has been assessed as a single parcel with variations in contribution to the MOL criteria and the harm of MOL release defined within. The MOL assessment process is split into three steps as shown below:



**1.14** Professional judgement is used at each step, but detailed justification is provided for all ratings given in the detailed parcel assessment reports for each area of MOL.

**1.15** 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).

**1.16** 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>4</sup>

## Green Belt assessment findings

**1.17** The Green Belt assessments can be broadly broken down into two discrete outputs:

- Contribution to the five Green Belt purposes (the product of Green Belt assessment methodology steps 1, 2 and 3 set out above); and
- Harm to the Green Belt purposes associated with Green Belt release (the product of Green Belt assessment methodology steps 4, 5 and 6 set out above).

**1.18** Figures 1.1, 1.2, 1.3, 1.4 and 1.5 illustrate the contribution of Enfield's Green Belt land to each of the five Green Belt purposes.

**1.19** Figure 1.6 illustrates the harm of releasing Green Belt land out from the existing inset urban edges of within and directly adjacent to the borough. Figure 1.6 includes the parcel boundaries and references used to draw out the detailed variations in potential Green Belt harm. The parcels illustrated in Figure 1.6 exclude the absolute constraints listed above.

**1.20** 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 reports in Appendix B of the main report.

## Green Belt contribution

**1.21** The vast majority of the borough's Green Belt makes a strong contribution to at least two of the Green Belt purposes,

<sup>4</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.

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>5</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.

**1.22** 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.

**1.23** 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**

**1.24** 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.

**1.25** 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.

**1.26** Inappropriate development<sup>6</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.

**1.27** 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 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**

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

**1.29** 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.

<sup>5</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 purpose the greater the likelihood that the Green Belt is of notable importance/value in Green Belt terms.

<sup>6</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.

**1.30** 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.

**1.31** 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.

**1.32** 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 boroughs' 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.

**1.33** 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.

**1.34** 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.

**1.35** 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**

**1.36** 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.

**1.37** 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.

**1.38** 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 inset 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.

**1.39** 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.

**1.40** Open Green Belt land contained by the urbanising influences of the urban edges of Greater London and Crews Hill, 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**

**1.41** 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>7</sup> and Conservation Areas within and adjacent to the Green Belt have also been reviewed.

**1.42** 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'.

**1.43** 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 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;

<sup>7</sup> The Registered Park and Gardens within the borough's Green Belt fall entirely within some of the borough's Conservation Areas.

- 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”.

**1.44** 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** of the main report and the detailed site assessment reports in **Appendices B** and **C** of the main report.

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

**1.45** 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**

**1.46** 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.

**1.47** 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.

**1.48** 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.

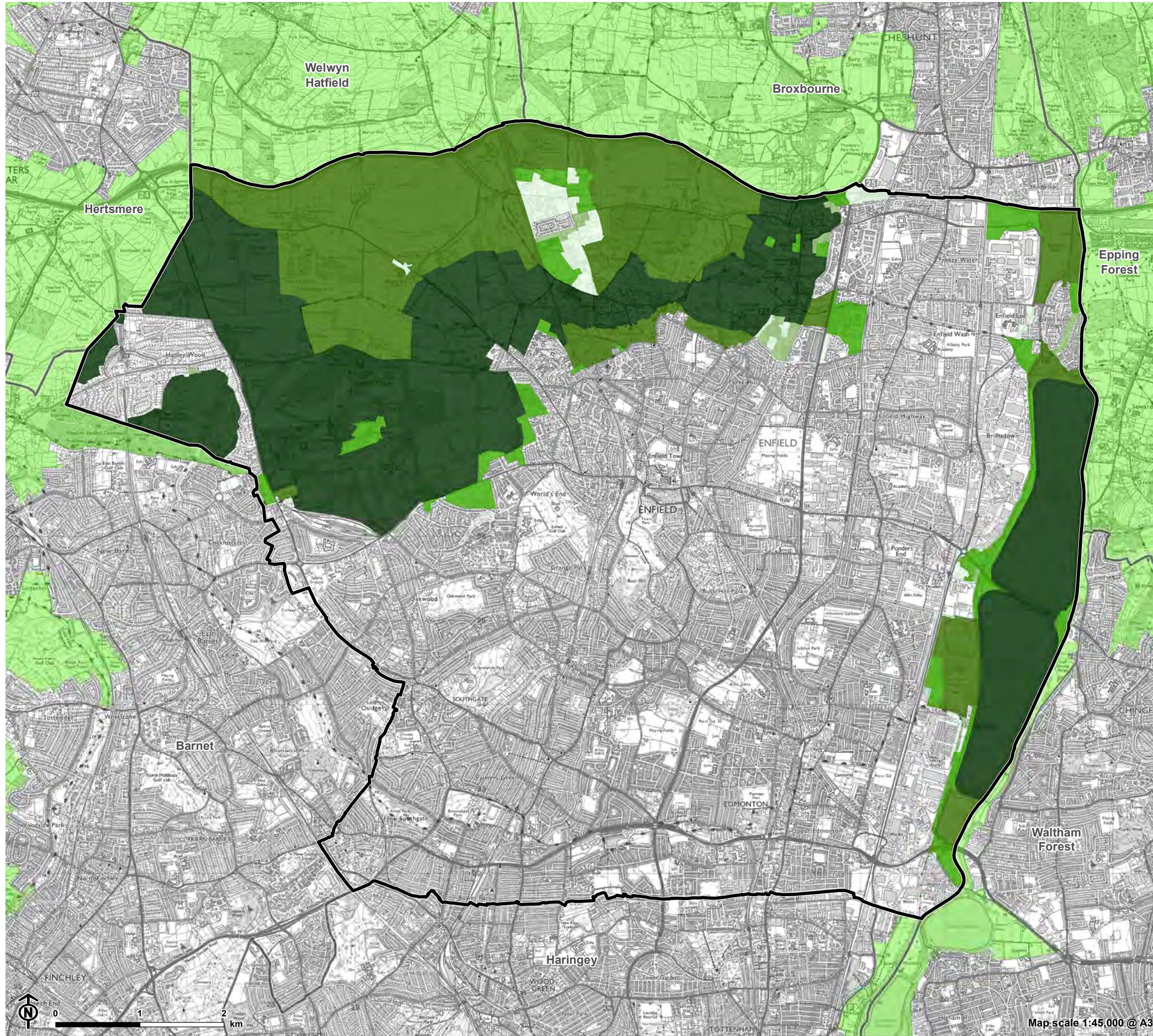


Figure 1.1 – Contribution to Green Belt Purpose 1 – Check the unrestricted sprawl of the large built-up area

- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt

#### Contribution rating

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no

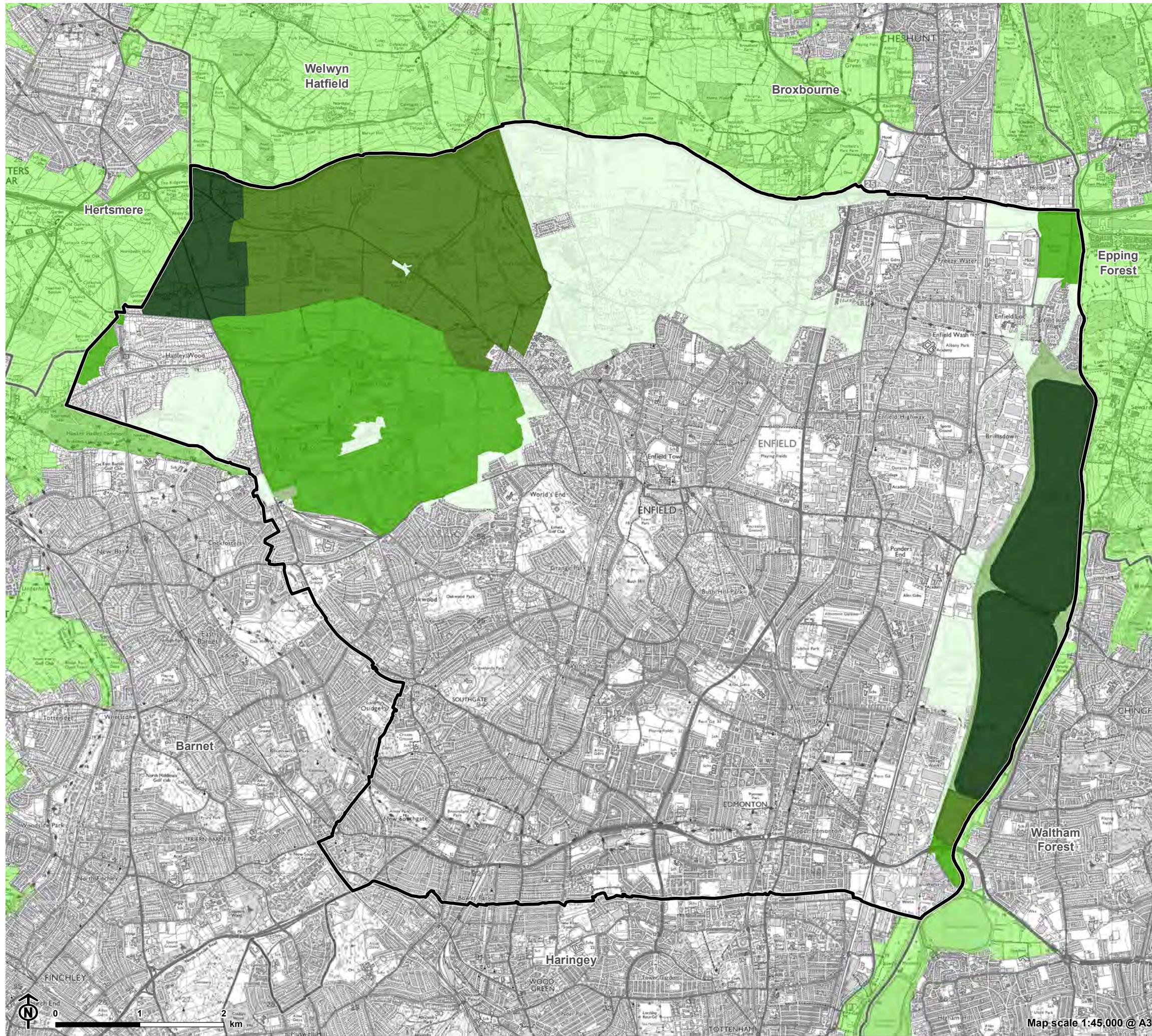


Figure 1.2 – Contribution to Green Belt Purpose 2 – Prevent neighbouring towns from merging into one another

- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt

#### Contribution rating

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no

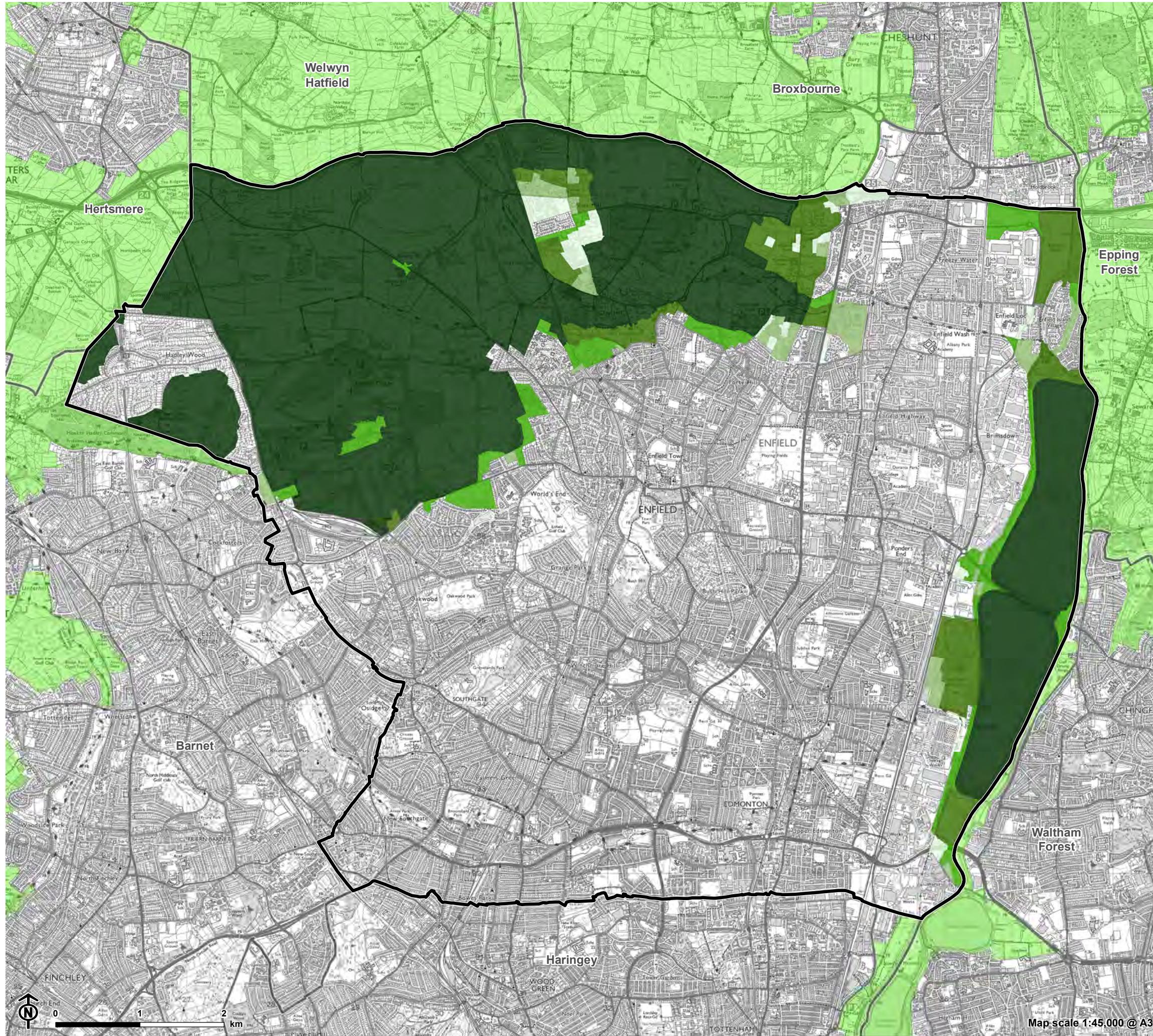


Figure 1.3 – Contribution to Green Belt Purpose 3 – Assist in safeguarding the countryside from encroachment

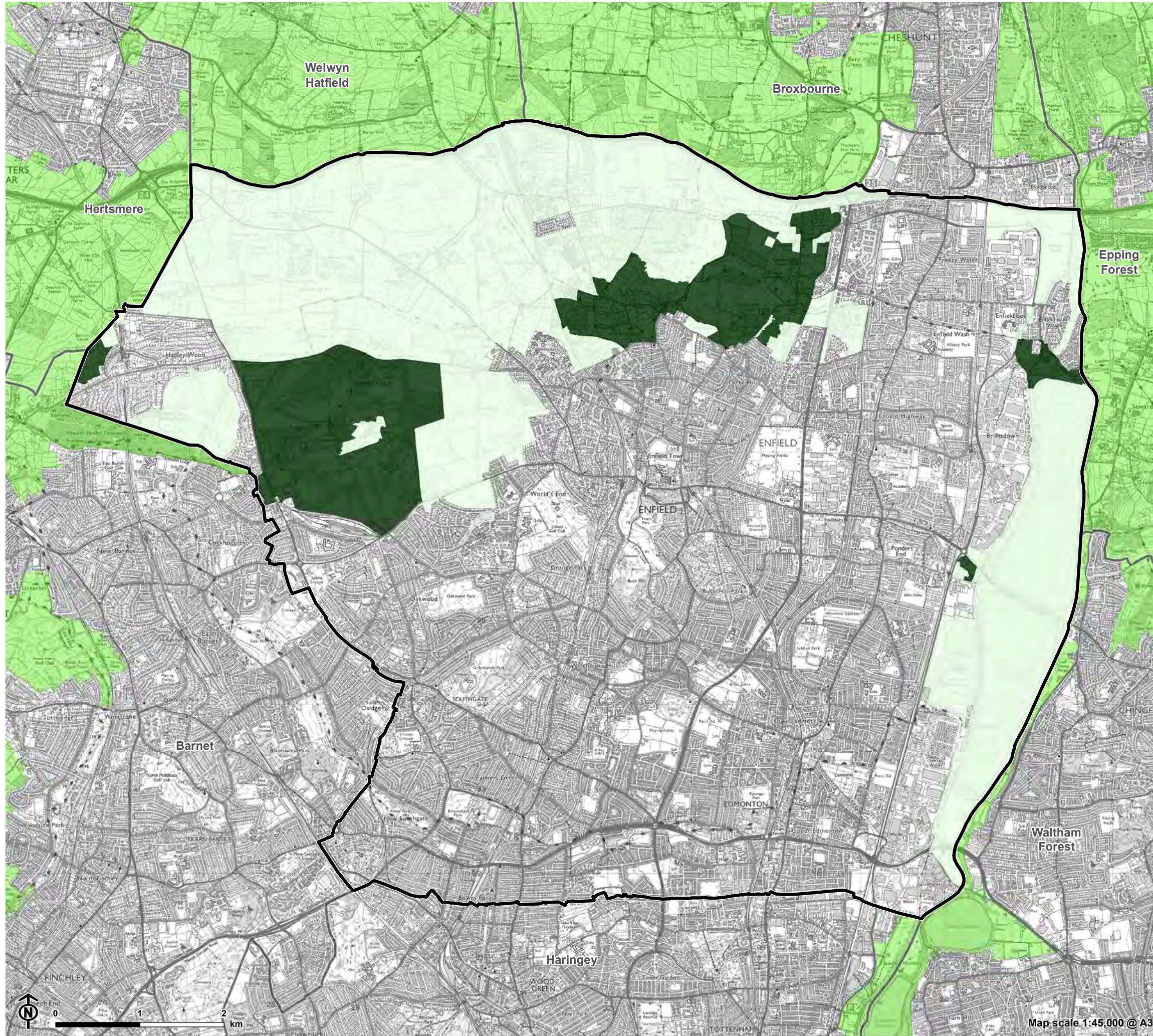


Figure 1.4 – Contribution to Green Belt Purpose 4 – Preserve the setting and special character of historic towns

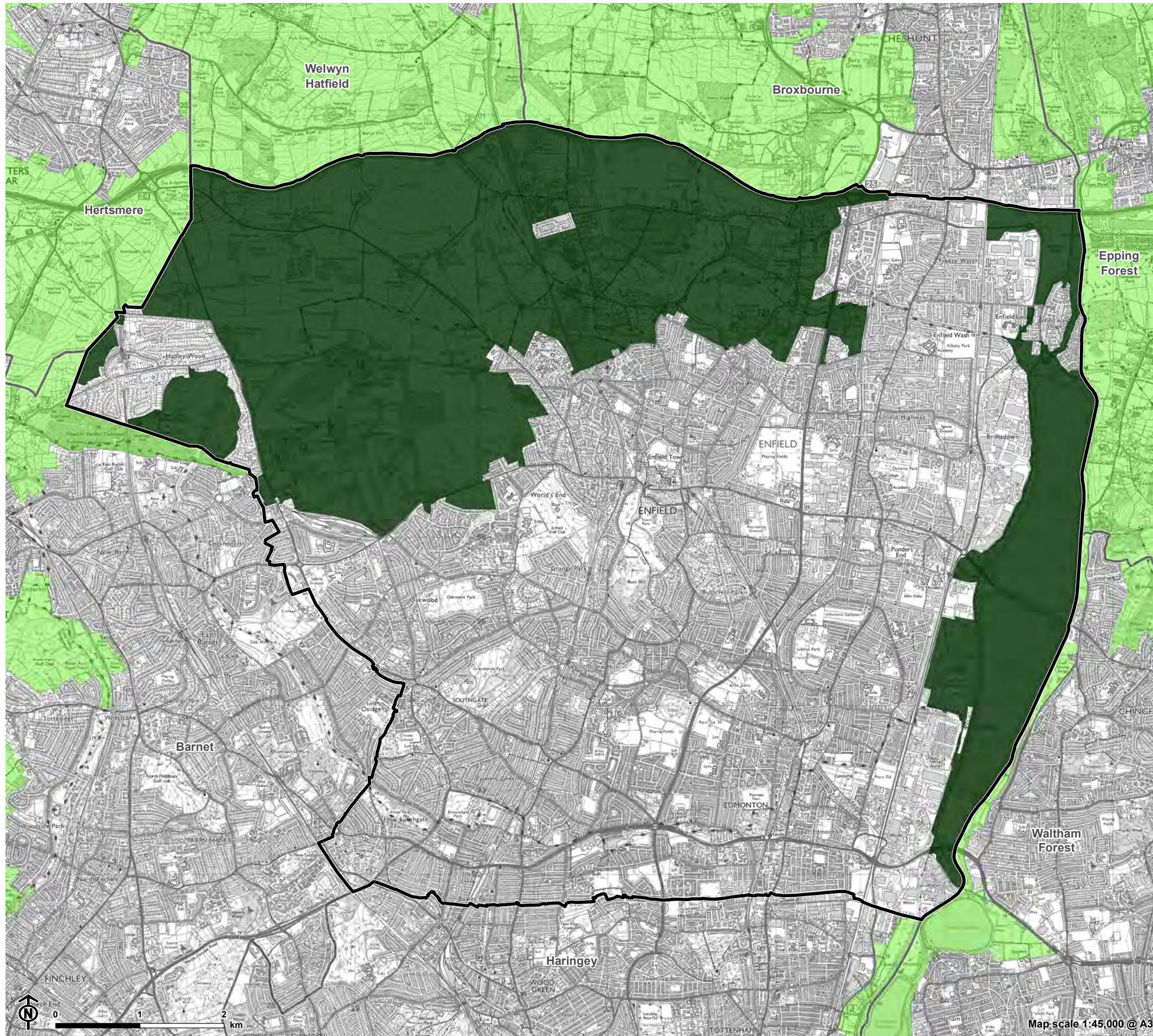


Figure 1.5 – Contribution to Green Belt Purpose 5 – Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Neighbouring authority Green Belt

#### Contribution rating

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak/no

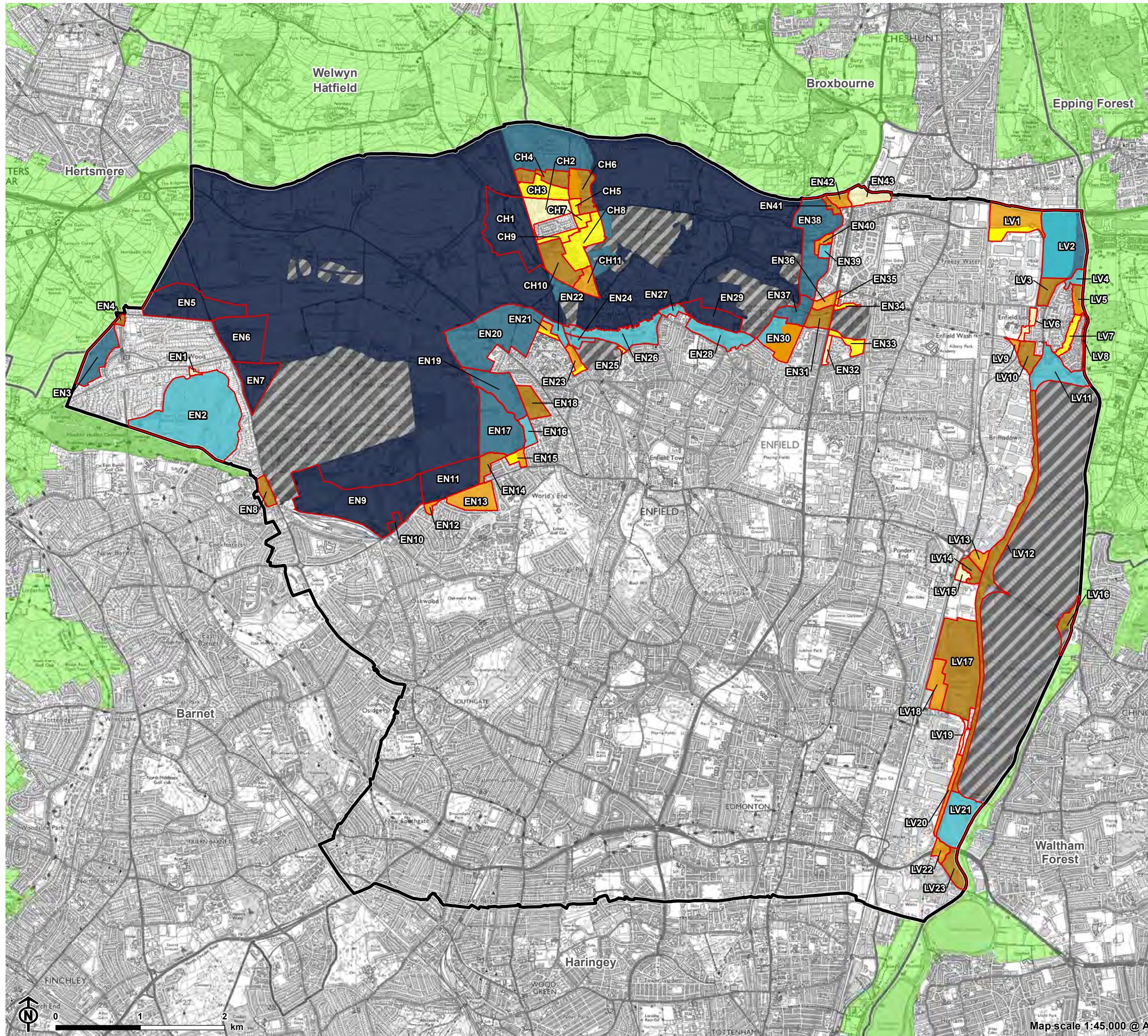


Figure 1.6 – Green Belt harm of releasing land from the designation

- 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.

## MOL assessment findings

**1.49** The MOL assessments can be broken down into two discrete outputs:

- Contribution to the MOL criteria (the product of MOL assessment methodology step 1 above).
- Harm to the MOL criteria associated with MOL release (the product of MOL assessment methodology steps 2 and 3 above).

**1.50** Figures 1.7, 1.8, 1.9 and 1.10 illustrate the contribution of Enfield's MOL to each of the four MOL criteria.

**1.51** Figure 1.11 illustrates the harm of releasing MOL and the MOL references used to distinguish between different areas of MOL.

**1.52** The detailed judgements associated with the contribution of MOL and the harm of release (in MOL terms) within each parcel are set out in the reports in Appendix C of the main report.

### MOL contribution

**1.53** 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>8</sup>:

- 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); and
- Southern portion of Pymmes Park associated with and in view of the historic walled garden (MOL28).

**1.54** 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).

<sup>8</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.

**1.55** 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**

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

**1.57** 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.

**1.58** 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**

**1.59** 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).

**1.60** 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.

**1.61** 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**

**1.62** 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>9</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).

**1.63** 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.

<sup>9</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.

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

**1.64** 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>10</sup>.
  - Tile Kiln Lane Open Space (MOL31).
  - 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).

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

**1.66** 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 of 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.

**1.67** 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

<sup>10</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

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

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).

**1.68** 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.



Figure 1.7 – Contribution to MOL Criterion 1 – Contribution to the physical structure of London by being clearly distinguishable from the built up area



**Figure 1.8 – Contribution to MOL Criterion 2 – Presence of open-air facilities which serve either the whole of or a significant part of London**



Figure 1.9 – contribution to MOL criterion 3 -  
Presence of features or landscapes of national or  
metropolitan value

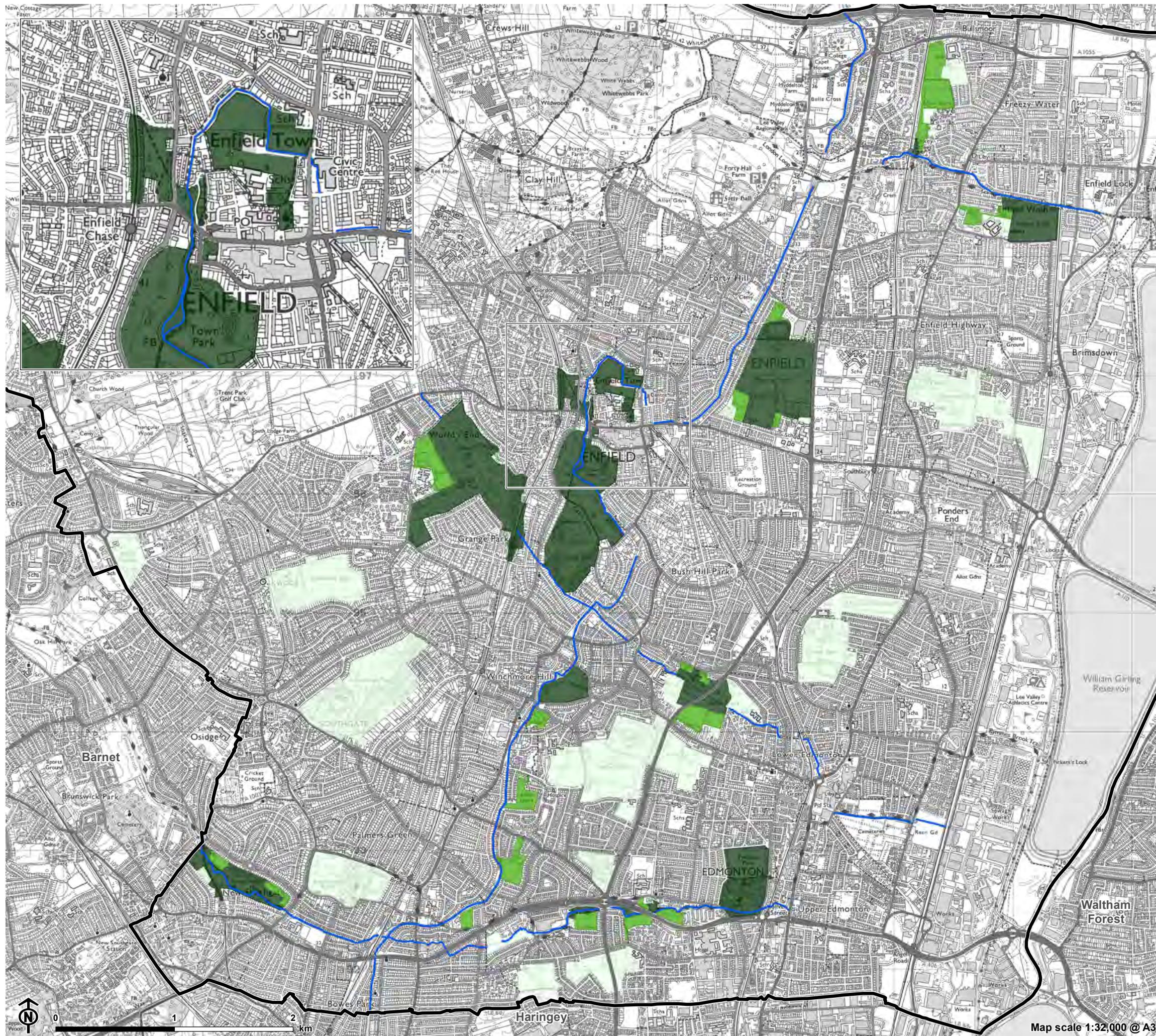


Figure 1.10 – Contribution to MOL Criterion 4 –  
Forms part of a network of green infrastructure and  
meets one of the other criteria (1, 2 or 3)

- Enfield Borough boundary
- Neighbouring Local Authority boundary
- Green Chain corridor

#### Contribution rating

- Strong
- Moderate
- Weak/no



Figure 1.11 – MOL harm of releasing land from the designation

Enfield Borough boundary  
Neighbouring Local Authority boundary

MOL parcel

Green Chain corridor

**MOL harm of release**

- Very high
- High
- Moderate high
- Moderate
- Low moderate
- Low
- Very low

## Site Assessments

**1.69** The Council has currently collected 36 site options in the Borough's Green Belt or MOL (five MOL sites and 31 Green Belt sites) for potential allocation in the Enfield Local Plan.

**1.70** 28 Green Belt sites and two MOL sites have been assessed to determine the harm of their release from the designations. The same methodology set out in **Chapters 4** and **5** of the main report have been applied to the assessment of the sites. However, they differ in that they are being applied to specific isolated sites and/or combinations of clustered sites rather than all designated land in the Borough.

**1.71** 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, consideration has been given to 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

**1.72** The locations and extent of the site options are illustrated in Figure 1.12.

**1.73** NPPF paragraph 139 requires plans defining new Green Belt boundaries to:

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

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

**1.75** 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 meeting the requirement of paragraph 139, wider areas of release following clearer readily recognisable and permanent boundaries have been assessed where appropriate.

**1.76** 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>11</sup>.



**1.77** **Table 1.1** 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. Justification as to why each site has been assessed in isolation and/or in combination with a wider area or other sites can be found in **Table 8.1** of the main report. The final column of **Table 1.1** highlights the likely harm of releasing each area. Further details of the justification for each rating and notable opportunities to minimise harm to the designations in each location are recorded in the detailed assessment proforma in **Appendix D** of the main report.

<sup>11</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 1.1: Green Belt and MOL harm assessment summary table

Site Reference and Location	Assessment Reference	Harm of Releasing Whole Assessment Area <sup>12</sup>
<b>Green Belt Sites</b>		
LP465 – Land between Camlet Way and Crescent West	LP465	Very High*
CFS155 – Junction 24, Part New Cottage and Holly Hill Farm	CFS155_ext	Very High
LP707 – Vicarage Farm, Land between Hadley Road and Enfield Road	CPC1 – Chase Park Cluster 1	Very High*
LP1153 – Bramley Road		
LP488 – Land west of The Ridgeway and Fairview Road	CPC2 – Chase Park Cluster 2	Moderate*
LP10 – Chase Park	LP10_ext	Very High*
CFS162 – 66 Ridgeway	CFS162	Low-Moderate
LP642 – Land opposite Jolly Farmers	LP642_ext	Low-Moderate*
LP623 – Land south of Enfield Road	LP623_ext	Low-Moderate
LP107 – Burnt Farm Ride	CHC1 – Crews Hill Cluster 1	Very High*
LP179 – Oak Farm and Homestead Nursery, Cattlegate Road	CHC2 – Crews Hill Cluster 2	Low*
CFS159 – Wyevale Garden Centre, Cattlegate Road		
LP056 – Wolden Garden Centre, Cattlegate Road	CHC3 – Crews Hill Cluster 3	Very Low
LP031 – Warmerdams Nursery, Cattlegate Road		
LP645 – Towneley Nurseries, Theobalds Park Road		
LP649 – Brown's Garden Village, Theobalds Park Road	CHC4 – Crews Hill Cluster 4	Low
CFS132 – Land at 135 Theobalds Park Road		
CFS169 – Kings Oak Equestrian Centre	CFS169	Low
LP9 – Crews Hill	LP9_ext	Very High*
LP637 – Land north of Goat Lane	LP637_ext	Low-Moderate
LP1138 – Land opposite Enfield Crematorium (aka The Dell), Great Cambridge Road	LP1138	Moderate
LP472a – Land to the rear of Jesus Christ Church	FHC1 – Forty Hill Cluster 1	High
LP472b – Land to the rear of Forty Hill Church of England School	FHC2 – Forty Hill Cluster 2	High
LP606 – Rammey Marsh, Mollison Avenue	IBPC1 – Innova Business Park Cluster 1	Low-Moderate*
CFS148 – Land to north west of Innova Park		

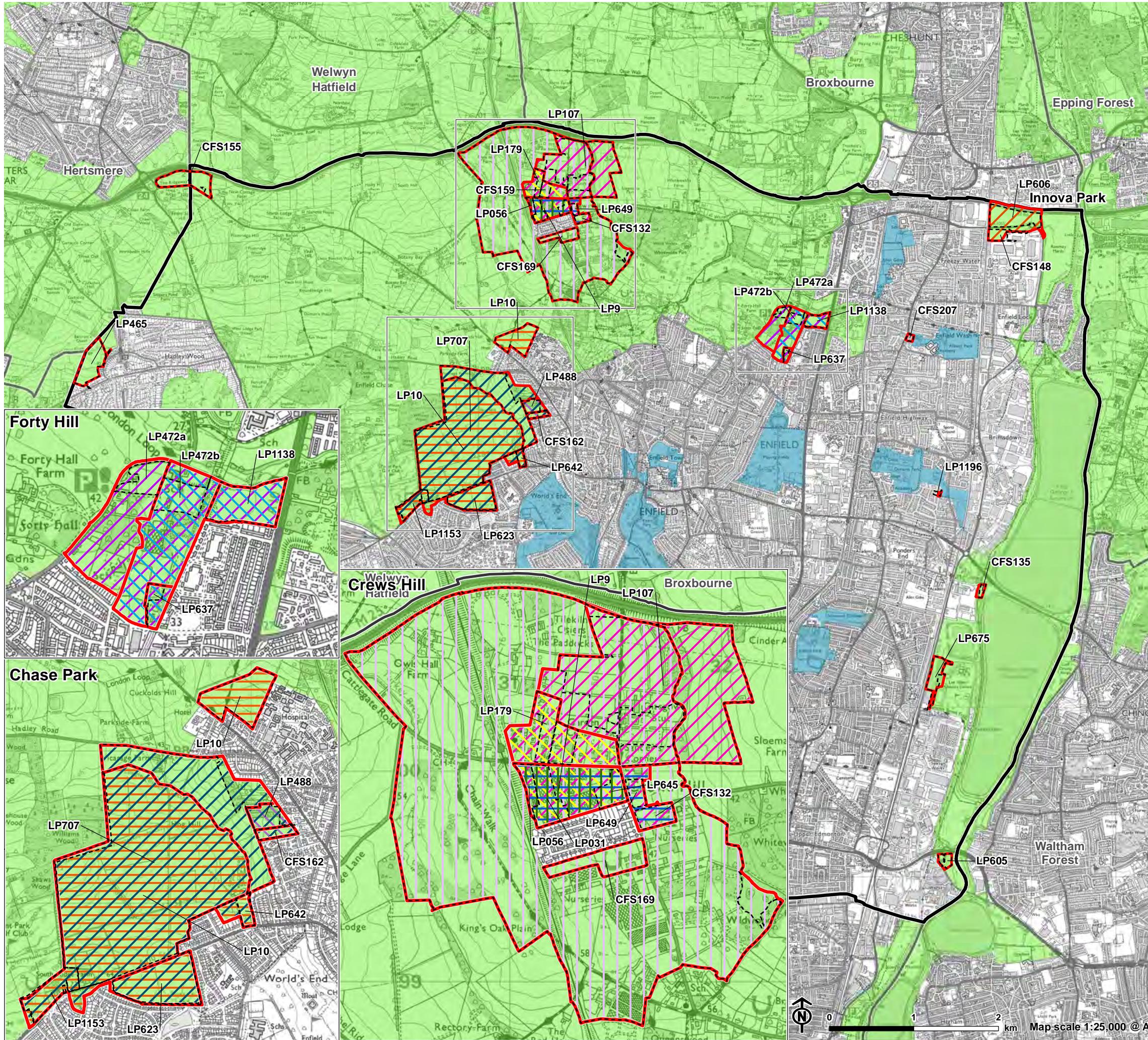
<sup>12</sup> Opportunities to minimise harm in each assessment area are recorded at the end of each assessment proforma in Appendix D. Sites with notable opportunities to minimise harm are referenced with a \*.

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Site Reference and Location	Assessment Reference	Harm of Releasing Whole Assessment Area <sup>12</sup>
CFS135 – Navigation Park Carpark	CFS135_ext	Moderate
LP675 – Land at Picketts Lock	LP675_ext	Low-Moderate
LP605 – Land at Harbert Road	LP605_ext	Moderate*
<b>MOL Sites</b>		
LP1196 – Land at former Wessex Hall Building	LP1196_ext	Low
CFS207 – Albany Leisure Centre and Car Park, 55 Albany Road	CFS207	Low

Figure 1.12: Green Belt and MOL Sites Being Considered for Release and Assessment Proforma References



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

**1.78** 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.

**1.79** 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.

**1.80** **Table 1.2** names six remaining site options 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 1.13** illustrates the locations and extent of these site options.

Table 1.2: Green Belt and MOL promoted for potential beneficial uses

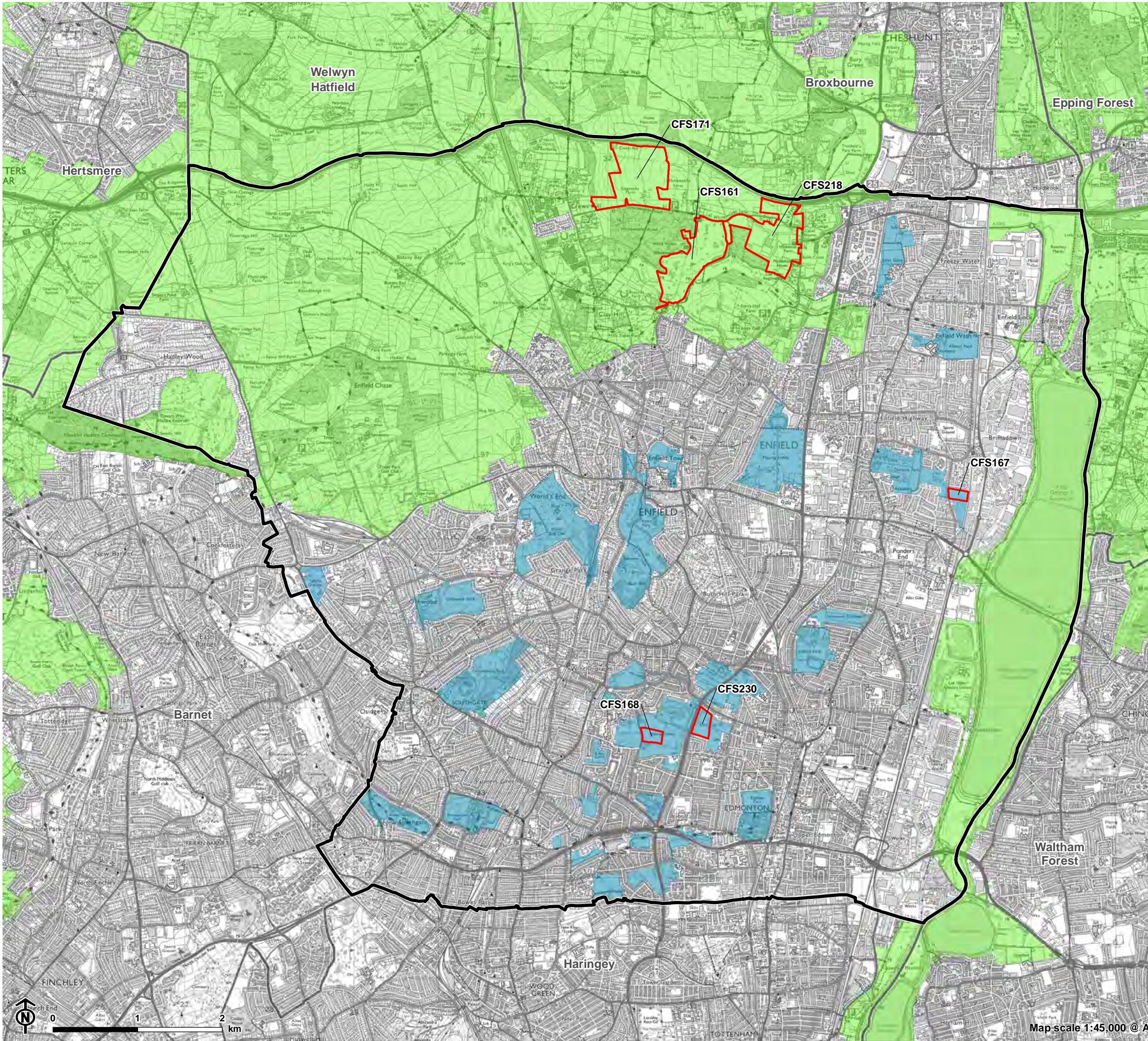
Site Reference and Location	Promoted Uses
<b>Green Belt Sites</b>	
CFS161 – Whitewebbs Golf Course, Beggar's Hollow	Green and blue infrastructure enhancements, incorporating sport or leisure uses.
CFS171 – Sloemans Farm	Green and blue infrastructure enhancements, incorporating sport or leisure uses.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

**1.81** The majority of the promoted land uses on 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:

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

Figure 1.13: Green Belt and MOL Sites Being Considered for Potential Beneficial Uses



### Appropriateness of the promoted uses

**1.82** 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.

**1.83** 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 five 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).

**1.84** 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.

**1.85** 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

**1.86** 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 sport, leisure uses and associated facilities

**1.87** 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.

**1.88** New outdoor leisure uses and associated facilities cover a broad range of potential developments. 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.

**1.89** 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.

**1.90** 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

**1.91** 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.

**1.92** 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

**1.93** 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.

**1.94** 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. Mausoleums, vaults or crematoria as proportionate extensions or alterations to existing buildings may be found to be appropriate in the designations.

**1.95** 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

**1.96** 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.

**1.97** 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)

**1.98** 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).

**1.99** 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)

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

**1.101** 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.

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

**1.102** 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).

**1.103** 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)

**1.104** 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 **8** in the main report and **Appendix C** for further details).

**1.105** The site contains no existing buildings and is fundamentally open, connecting the allotments to the south with the wider MOL to the west. 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)

**1.106** 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 **8** in the main report and **Appendix C** for further details).

**1.107** The site contains no existing buildings and is fundamentally open. 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)

**1.108** 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 **8** in the main report and **Appendix C** for further details).

**1.109** The site contains no existing buildings and is fundamentally open. 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.

## Next steps

### Exceptional circumstances

**1.110** 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).

**1.111** 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 sites known at the time.

### Enhancement of Green Belt and MOL

**1.112** 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. The following notable beneficial uses of the designations offer an insight into where enhancements and synergies may be found:

- Improving access to open spaces and the countryside.
- Providing locations for outdoor sport.
- Landscape and visual enhancement.
- Historic environment enhancement and interpretation.
- Increasing biodiversity.
- Climate change mitigation and adaptation.
- Improving damaged and derelict land.

### Mitigation measures to reduce Green Belt or MOL harm

**1.113** In addition to avoiding the release of areas identified as having the potential to generate higher Green Belt and MOL harm, 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. However, the following kinds of measures should be considered 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:

- Use landscape treatment to help integrate a new designation boundary with the existing urban edge.
- Strengthen boundary at weak points – e.g. where 'breached' by roads.

- Define urban edges using a strong, natural element which forms a visual barrier – e.g. a woodland belt.
- Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.
- Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.

**1.114** Again, the Council and site developers should look for appropriate synergies between such mitigation measures and opportunities to enhance the beneficial uses of the designations.

#### Designation of new MOL

**1.115** 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.