

Traveller Local Plan 2020-2041

Green Belt Exceptional Circumstances Topic Paper

September 2025

Background Topic Paper

This background topic paper has been prepared to support the proposed Submission Version Enfield Traveller Local Plan (Regulation 19). It sets out the exceptional circumstances for limited Green Belt land and Metropolitan Open Land (MOL) release, to meet identified traveller accommodation needs.

This Topic Paper should be read alongside the Traveller Local Plan Site Selection Topic Paper (September 2025).

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1 Introduction

Purpose of this document

- 1.1 This Topic Paper forms part of the evidence base for the Enfield Traveller Local Plan (TLP), which covers the period 2020 – 2041. It has been produced to support the plan-making process, and seeks to justify and outline the exceptional circumstances required for the release of small areas of Green Belt and Metropolitan Open Land (MOL) to meet the identified traveller accommodation needs.
- 1.2 The Topic Paper should be read alongside the Green Belt and Metropolitan Open Land Study¹ (prepared by LUC on behalf of the Council), which provides an assessment of the Green Belt and MOL within the Borough.
- 1.3 This Topic Paper is divided into 6 chapters:
 - Chapter 2 – Sets out the context. It provides a brief overview of the Green Belt and MOL in the Borough and summarises planning policy and guidance (and related case law) in relation to the Green Belt and exceptional circumstances matters.
 - Chapter 3 – Outlines the assessed need for Traveller accommodation in the Borough, for both permanent pitch provision and transit provision. It also addresses the high level development constraints in the Borough, which impact on the options available for meeting Traveller accommodation needs.
 - Chapter 4 – Sets out the strategic level exceptional circumstances case for amending the Green Belt and MOL boundaries to meet Traveller accommodation needs, and the compensatory improvements that can be made to the land that is to remain in the Green Belt.
 - Chapter 5 – Briefly addresses the local level exceptional circumstances for release of Green Belt and MOL as part of the proposed allocation of sites in the TLP.
 - Chapter 6 – Provides the overall conclusion, confirming the exceptional circumstances that justify the proposed release of land from the Green Belt and MOL to meet Traveller accommodation needs.

¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

2 Background and Planning Policy Context

The Green Belt in Enfield

- 2.1 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.
- 2.2 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.
- 2.3 The Borough's Green Belt covers approximately 37% of the Borough's land area (see **Figure 1b** below), and contains a mixture of arable farmland, green space, woodland and waterways, as well as areas of existing development.
- 2.4 Hadley Wood and Cockfosters are inset from the Green Belt, as is a small residential area in Crews Hill. The Green Belt washes over the Hamlet of Botany Bay.
- 2.5 The Green Belt boundary in Enfield was amended through the 1994 Unitary Development Plan, after Enfield Island Village was transferred into the Borough from Epping Forest District Council, and the land designated as Green Belt. More recently, the adopted 2010 Core Strategy² (paragraph 8.68) confirmed that a detailed review of the Green Belt boundaries in the Borough would be undertaken to inform the Development Management Development Plan Document³ (DM DPD). This review was undertaken⁴, and the detailed amendments made to the Green Belt boundary upon adoption of the DM DPD. The amendments made were mainly minor in nature and justified on the grounds of providing a more robust, logical and defensible Green Belt boundary.

² https://www.enfield.gov.uk/_data/assets/pdf_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf

³ https://www.enfield.gov.uk/_data/assets/pdf_file/0021/2946/dmd-adopted-planning.pdf

⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0024/5883/planning-policy-information-enfield-green-belt-boundary-review-april-2012.pdf

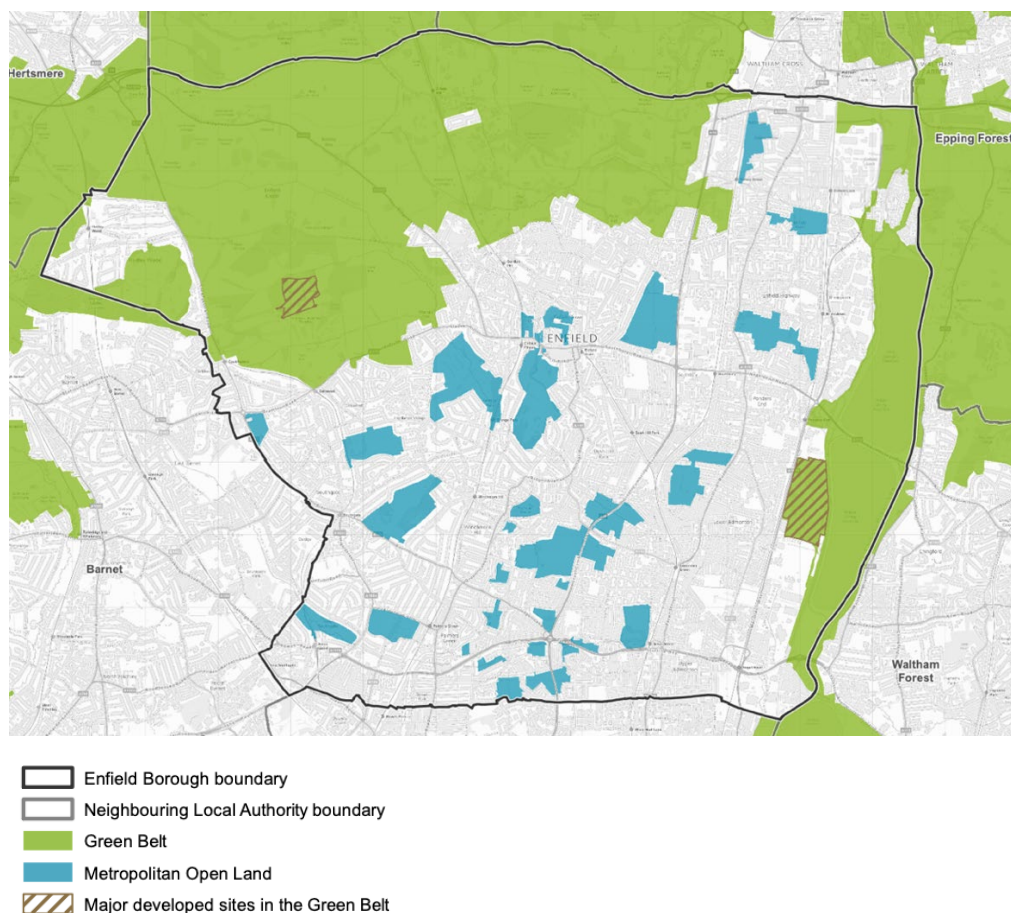
- 2.6 The new Enfield Local Plan (ELP) is currently at examination, and proposes the release of land from the Green Belt to meet the Borough’s housing, employment and other development needs in the period to 2041.

MOL in Enfield

- 2.7 The Borough’s Metropolitan Open Land (MOL) covers approximately 7.1% of the Borough’s land area (see **Figure 1**), and contains a mixture of parks, cemeteries and other green spaces. The London Plan 2021 (paragraph 8.3.1) explains that MOL “...is strategic open land within the urban area. It plays an important role in London’s green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.”

- 2.8 London Plan Policy G3: Metropolitan Open Land, confirms that any alterations to the boundary of MOL should be undertaken through the Local Plan making process, in consultation with the Mayor and adjoining Boroughs. MOL boundaries should only be changed in exceptional circumstances, when fully evidenced and justified.

Figure 1: Existing Green Belt and MOL in Enfield Borough



National Planning Policy and Guidance

- 2.9 Government policy on the Green Belt (and meeting Traveller accommodation needs) is primarily set out in the National Planning Policy Framework (NPPF)⁵ and associated Planning Practice Guidance (PPG), and in Planning Policy for Traveller Sites (December 2024)⁶.
- 2.10 At the heart of the NPPF is the presumption in favour of sustainable development. Sustainable development is that which best balances economic, social and environmental factors.
- 2.11 NPPF paragraph 11 explains what this means for plan-making. Plans are to promote sustainable patterns of development, meet the development needs of their area, align growth and infrastructure, improve the environment and mitigate and adapt to climate change. Strategic policies should, as a minimum, provide for the objectively assessed needs for housing and other uses, unless:
- i) *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 2.12 The policies referenced in i) are listed in full at footnote 7 of the NPPF, and include land designated as Green Belt.
- 2.13 NPPF Chapter 13 addresses the Green Belt. Paragraph 142 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”*.

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https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

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https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

2.14 This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes:

- 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.

2.15 The NPPF makes clear that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified (paragraph 145). It goes on to state that 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.”*

2.16 Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means (NPPF paragraph 146). In such circumstances, the NPPF states that *“...authorities should review Green Belt boundaries in accordance with the policies in this Framework and 43 propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*

2.17 NPPF paragraphs 147 and 148 set out the national policy approach for defining and altering Green Belt boundaries. These paragraphs require that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, a Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Through the examination process, consideration will be given to whether the TLP strategy:

- a) *“makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) *optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.*

2.18 NPPF paragraph 148 explains that where it is necessary to release Green Belt land for development, *“...plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”*

2.19 When defining Green Belt boundaries NPPF paragraph 149 states local planning authorities should:

- a) *“ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) *not include land which it is unnecessary to keep permanently open;*
- c) *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

2.20 NPPF paragraph 151 states that once Green Belts have been defined *“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.”*

Planning Policy for Traveller Sites

2.21 The Government’s planning policy for traveller sites is set out in Planning Policy for Traveller Sites⁷ (PPTS) (December 2024).

2.22 It sets out that local planning authorities should set pitch targets for Gypsies and Travellers, which address the likely permanent and transit site accommodation needs of travellers in the area, working collaboratively with neighbouring local planning authorities (paragraph 9).

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https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

2.23 Policy E of the Planning Policy for Traveller Sites states as follows:

“16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in Chapter 13 of the National Planning Policy Framework apply.

17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.”

The London Plan 2021

2.24 London Plan Policy H14 (Gypsy and Traveller Accommodation) states that Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches.

2.25 The role of the Green Belt is reflected in the London Plan. Policy G2 of the adopted London Plan⁸ 2021 states:

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.*

2.26 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.

2.27 The adopted London Plan also affords Metropolitan Open Land (MOL) the same status and level of protection as Green Belt land, 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

⁸ London Plan - https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

uses. In the supporting text reference is made to the following potential objectives and 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.

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

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.*

Local Planning Policy

2.29 The current extent of the Green Belt and MOL in the Borough is shown on the Policies Map⁹, which provides a visual representation of the Local Plan policies.

2.30 The Development Plan for Enfield currently comprises of the Core Strategy (2010), the Development Management Document (2014), the North Circular Area Action Plan (2014), the Edmonton and Leaside Area Action Plan (2020), the North East Enfield Area Action Plan (2016), the North London Waste Plan and the Hadley Wood Neighbourhood Plan (2023). All of these development plan documents (other than the North London Waste Plan and the Hadley Wood Neighbourhood Plan) will be replaced and consolidated by the ELP (upon adoption).

2.31 The ELP is currently at examination (September 2025). It sets out the Council's strategic commitment to meeting the identified Gypsy and Traveller accommodation needs through a separate TLP (see ELP Policy H10: Traveller Accommodation).

2.32 The ELP proposes the release of land from the Green Belt to meet housing, employment and other development needs in the period to 2041.

⁹ https://www.enfield.gov.uk/_data/assets/pdf_file/0022/3487/adopted-polices-map-planning.pdf

The Exceptional Circumstances Test

2.33 The definition of 'Exceptional Circumstances' was set out in the Guildford judgment, [Compton and Ockham Parish Councils V Guildford Borough Council and SoS \(2019\) EHC 3242](#). Sir Duncan Ousley confirmed that:

- i. There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.
- ii. Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.
- iii. A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.
- iv. "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."
- v. The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.
- vi. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

2.34 In terms of what matters should be considered, [Calverton Parish Council v Greater Nottingham Councils \[2015\] EWHC 10784](#) is relevant.

2.35 This sets out that the planning judgements involved in the consideration of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) of the Planning and Compulsory Purchase Act 2004. At the very least, the planning judgement should identify and grapple with the following matters;

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);

- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

2.36 As above, NPPF paragraph 147 requires that *“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”*. As set out later in this Topic Paper, and the associated Site Selection Topic Paper (September 2025), the Council has considered all reasonable options for meeting its development needs and made planning judgements in determining the proposed site allocations included in the Submission Draft TLP.

Examples of the successful demonstration of Exceptional Circumstances

2.37 Planning Magazine in May 2020 scrutinised 18 local plan examination reports from 2018/19 and 2019/20 to identify the factors most commonly agreed by inspectors to contribute to the presence of exceptional circumstances. The most frequent factors cited by inspectors to justify Green Belt land release were:

Unmet need for development

2.38 In making a case for exceptional circumstances, local authorities invariably start by identifying unmet development needs.

Lack of contribution to Green Belt purposes

2.39 In the October 2019 report on Broxtowe's Local Plan, the Inspector stated that *“the need for housing, the lack of alternatives in sequentially preferable locations outside of the Green Belt and their limited impact on the openness and purposes of the Green Belt constitute exceptional circumstances”*.

2.40 However, it is important to note that it is not necessary for land to contribute little to Green Belt purposes, for exceptional circumstances to exist.

Creation of defensible boundaries

2.41 Inspectors frequently give weight to considerations around whether a new defensible boundary can be established after a site is released from the Green Belt. Clear boundaries can be created by use of existing roads, woodland, hedgerows, railway lines and other physical features. In other cases, the release of land or associated work on site is considered to contribute to a sensible and well-defined boundary, more likely to bolster the permanence of the Green Belt and provide a more robust barrier to future encroachment.

- 2.42 In the examination of Cambridge City's Local Plan, the Inspector concluded that having two Green Belt housing sites "*gives rise to an opportunity for planting along the eastern boundary to form a stronger, landscaped edge to the city in this location*".

Limited visual impact

- 2.43 In February 2020, the Supreme Court's judgment in the [Samuel Smith Old Brewery \(Tadcaster\) v North Yorkshire County Council](#) opined that, while there is no express requirement in policy to take visual impact into account when considering the impact of development on Green Belt openness, it could still be a relevant factor for decision-makers exercising their planning judgement. Planning's analysis shows inspectors commonly consider whether there are features that would visually separate proposed Green Belt development sites in Local Plans from the surrounding open countryside, or make them less prominent in the wider landscape, thereby avoiding such allocations appearing to contribute to urban sprawl.

3 Development Needs

Introduction

- 3.1 This chapter summarises the traveller accommodation needs in the Borough. It also outlines some of the main factors that constrain land supply in the Borough, and the related implications for the delivery of sustainable development.

Traveller Accommodation Needs

- 3.2 Policy A (paragraph 7c), Planning Policy for Traveller Sites (December 2024) requires Local Planning Authorities to use a robust evidence base to establish accommodation needs to inform the preparation of Local Plans.
- 3.3 The evidence of need within Enfield Borough derives from the Gypsy and Traveller Accommodation Needs Assessment (GTANA), undertaken by specialist consultants Arc4 in 2020¹⁰, and updated in 2024¹¹.
- 3.4 As set out in the Submission TLP, there is a an overall need for 30 permanent Gypsy and Traveller pitches across the Borough in the period 2020/21 to 2040/41. Of this total, 16 pitches are required to address the existing pitch shortfall in the period up to 2024/25, and the remaining 14 pitches are needed over the subsequent Plan period up to 2040/41. The Enfield GTANA 2024 also identifies a need for space to accommodate permanent stopover location(s) for at least 15 caravans at one time.
- 3.5 The Enfield GTANA (2024) has not evidenced any need for Travelling Showperson plots in the Borough.

Land Supply Constraints

- 3.6 It is important to recognise that whilst the ELP and TLP are being progressed as two separate documents, they cover the same geographic area (i.e. the whole of the London Borough of Enfield), and consequently are working within the same land supply constraints context.

¹⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0022/45382/gypsy-and-traveller-accommodation-needs-assessment-2020-Planning.pdf

¹¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0021/63417/Gypsy-and-traveller-accommodation-needs-assessment-Planning.pdf

3.7 As set out in the Green Belt Exceptional Circumstances Topic Paper¹² for the Enfield Local Plan, the supply of developable land in the Borough is constrained by a range of factors, including NPPF policy objectives. In brief summary:

- Approximately 37% of the land area in Enfield is designated as Green Belt. Under NPPF policy, the construction of new buildings in the **Green Belt** is restricted, and exceptional circumstances must be demonstrated where a Local Plan proposes amendments to Green Belt boundaries (including that the authority has examined fully all other reasonable options for meeting its identified development needs);
- The Borough lies in close proximity to nationally and internationally significant nature conservation sites (including the Epping Forest Special Area of Conservation), and within the Borough there are 41 sites of Metropolitan, Borough and Local Importance for Nature Conservation. Seeking to conserve and enhance **biodiversity** is a core NPPF planning principle;
- There are over 1,000 hectares of **open space** within the Borough, comprising parks and gardens, natural and semi-natural green space, amenity green space, allotments, cemeteries and outdoor sports and recreation areas. Open spaces are afforded protection in the NPPF;
- Enfield is home to 22 conservation areas, expansive historic parks and numerous listed buildings. Local Plans should set out a positive strategy for the conservation and enjoyment of **heritage assets**, which will impact on whether land is developable, and in many cases also, the form and scale of development that is appropriate. It is important to note that all of the Borough's town centres, towards which growth would typically be expected to be directed, are also partially covered by conservation area designations – to varying degrees;
- Different places within the Borough have their own distinctive characters that have evolved over time and that are part of the heritage of the area (see Character of Growth Study¹³). Taking into account the **character** of different areas will, in some circumstances, but not all, impact on the capacity of development opportunities.

¹² https://www.enfield.gov.uk/_data/assets/pdf_file/0032/54995/Exceptional-Circumstances-Topic-Paper-Planning.pdf

¹³ https://www.enfield.gov.uk/_data/assets/pdf_file/0019/53191/Character-of-Growth-Report-Rev-B-Part-2-Planning.pdf

- 3.8 There are also policies in the London Plan that serve to constrain the supply of developable land, for example the policies that seek to protect Strategic Industrial Locations (see London Plan Policy E5: Strategic Industrial Locations).
- 3.9 In relation to the Enfield Local Plan, the Council concluded that, taking into account a range of factors (including land supply constraints), that there were the necessary exceptional circumstances to release land from the Green Belt to meet identified housing, employment and other development needs in the period to 2041.

Good Growth and Delivering Sustainable Patterns of Development

- 3.10 In accordance with the London Plan and NPPF, the TLP must promote good growth, i.e. growth that is socially and economically inclusive and environmentally sustainable. This means that the identified needs for traveller accommodation must be carefully assessed, to ensure that the growth can be accommodated in a way that will be socially and economically inclusive and avoid unacceptable environmental impacts.
- 3.11 The Integrated Impact Assessment (IIA)¹⁴ process has had a key role in this ‘balancing exercise’ - exploring the likely social, economic and environmental impacts of accommodating new traveller sites within the Borough. The IIA also considers the scope for mitigating any identified potential adverse impacts.

¹⁴ <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

4 Strategic Level Case for Exceptional Circumstances to amend Green Belt and Metropolitan Open Land Boundaries

Introduction

- 4.1 NPPF paragraph 145 states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. This chapter of the Topic Paper sets out the strategic level exceptional circumstances case for the proposed amendments to the Green Belt and Metropolitan Open Land (MOL) boundaries. The next chapter of the Topic Paper (Chapter 5) briefly summarises the local level case (the site specific factors relevant to the proposed Green Belt and MOL releases).
- 4.2 The exceptional circumstances case for reviewing Green Belt and MOL boundaries at the strategic level includes consideration of the following factors:
- The need to identify sufficient land to meet gypsy and traveller accommodation needs;
 - The need to identify an appropriate strategy for meeting gypsy and traveller accommodation needs, having considered the reasonable alternatives;
 - The need to make as much use as possible of suitable brownfield sites and underutilised land, the need to optimise development densities and the need to explore whether neighbouring authorities can assist with meeting development needs.
 - The need to promote sustainable patterns of development;
 - The overall harm caused by the releases from the Green Belt and MOL area (taking into account the scale and nature of the proposed site allocations);
 - The opportunities available to help increase the beneficial use of the remaining Green Belt, including interventions that meet green infrastructure and biodiversity net gain objectives.
- 4.3 These factors are considered in turn below.

Traveller Accommodation Need

- 4.4 Paragraph 4 of Planning Policy for Traveller Sites (2024)¹⁵ sets out the Government's aims in respect of traveller sites. These aims include:
- a) that local planning authorities should make their own assessment of need for the purposes of planning; and
 - b) to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- 4.5 The Enfield GTANA 2024 provides a robust assessment of traveller accommodation needs across the Borough in the period 2020/21 to 2040/41. It sets out a requirement for 16 pitches to address the existing pitch shortfall in the period up to 2024/25, with a need for 14 further pitches over the subsequent Plan period up to 2040/41. The Enfield GTANA 2024 also identifies a need for space to accommodate transit provision for at least 15 caravans at one time.
- 4.6 These are the evidenced traveller accommodation needs that the TLP must address.

Appropriate Strategy, Taking into Account Reasonable Alternatives

- 4.7 The NPPF requires Local Plans to meet the tests of soundness, and one of these tests relates to the plan being 'justified' i.e. having "*an appropriate strategy, taking into account the reasonable alternatives*" (NPPF paragraph 36). Further, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, NPPF paragraph 147 requires local planning authorities to examine fully all other reasonable options for meeting the identified needs for development.
- 4.8 Having established the need to provide for 30 permanent Traveller pitches and at least one new transit site with a capacity to accommodate a minimum of 15 caravans, the Council has explored the available options (or "reasonable alternatives") for meeting these identified needs.

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https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

Sources of Potential Sites to meet Traveller Accommodation Needs

- 4.9 As there are currently no existing permanent or transit sites within the Borough, the Council does not have the option to consider expanding or refurbishing any existing facilities.
- 4.10 Neighbouring authorities have been approached under the Duty to Co-operate on several occasions. However, as confirmed in the Duty to Cooperate Compliance Statement¹⁶, no neighbouring authorities have advised that they have the capacity to assist in meeting any unmet traveller accommodation needs arising from Enfield.
- 4.11 The Council has conducted several Call for Sites exercises as a part of the emerging Enfield Local Plan (ELP), including a specific Call for Sites exercise undertaken in 2022, for Gypsy and Traveller provision. A further Call for Sites was made as part of the Issues and Options Regulation 18 consultation in September 2023, and again during consultation on the Draft TLP Regulation 18 consultation in September 2024. Despite these multiple calls for sites, no private landowners or developers have come forward to promote sites for any form of Gypsy and Traveller provision.
- 4.12 A limited number of Council owned sites were promoted during the Call for Sites in 2022, but together, these sites were unable to meet all of the identified need for permanent pitch provision and transit provision within Enfield (taking into account the identified site and delivery constraints, and combined capacity). Following a comprehensive internal review of Council land holdings by the Council's Property Services Team, nine Council-owned sites were identified and put forward as being potentially suitable for Gypsy and Traveller provision.
- 4.13 These nine sites were presented in the Regulation 18 Draft TLP¹⁷ (see Table 3, page 16) and are listed below:
- Bulls Cross Nursery, Bulls Cross (EN1 4RJ)
 - Durants Park Bowling Green (EN3 5JE)
 - Land Adjacent to Ridgeway (EN2 8AE)
 - Hillyfields Depot and Land (EN2 0HN)
 - Comreddy Close (EN2 8RN)

¹⁶ <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

¹⁷ https://www.enfield.gov.uk/_data/assets/pdf_file/0027/64467/Traveller-local-plan-reg-18-part-2-draft-plan-Sept-2024-Planning.pdf

- Dove Lane, Potters Bar (EN6 2SH) (Outside of Enfield Borough, but owned by the London Borough of Enfield).
- Land at Sterling Way / Weighbridge (N18 1BH)
- Land south of Dendridge Close (EN1 4PN)
- Land at A10 (N21 2PS)

4.14 All nine of these sites are either in the Green Belt, or are designated as Metropolitan Open Land (MOL).

4.15 The Council has re-looked at the sites assessed for housing delivery as part of the Housing and Economic Land Availability Assessment (HELAA)¹⁸. The deliverable and developable sites have been taken forward in the ELP to help meet housing needs in the Borough in the period up to 2041. The sites within the HELAA that were rejected for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be suitable for meeting Traveller accommodation needs. In addition, these sites have not been promoted for meeting Traveller accommodation needs, and therefore are not considered available.

4.16 The Council has also reviewed the potential role of the ELP placemaking areas to assist in meeting Traveller accommodation needs. The urban placemaking areas were found to be unsuitable for reasons including:

- Strategic commitments already made through planning consents and funding agreements (e.g., Meridian Water).
- Incompatible uses (e.g., town centre intensification, employment hubs).
- Lack of available land suitable for Traveller site requirements.

4.17 However, the two strategic rural placemaking areas of Chase Park and Crews Hill could assist with meeting Traveller accommodation needs, and accordingly have been subject to further assessment as part of the TLP process.

4.18 Overall, whilst the Council has explored the full range of potential options for addressing Traveller accommodation needs, the “reasonable alternatives” are very

¹⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54894/Housing-and-Economic-Land-Availability-Assessment-HELAA-April-2023-Planning.pdf

limited. There is not the option of expanding existing sites (as there are no existing sites in the Borough) and adjoining authorities have confirmed that they are not able to assist in meeting Enfield's Traveller accommodation needs. In terms of sites within the Borough that are potentially suitable for meeting Traveller accommodation needs, none have been put forward by private landowners or developers, and the deliverable and developable sites identified in the Council's HELAA have all been taken forward in the ELP to help meet other housing needs (and cannot also accommodate the specific requirements for Traveller accommodation needs).

- 4.19 The Council's landholdings have been assessed, as well as the ELP placemaking areas, and from all of the aforementioned potential sources of site supply, just 9 potential sites have been identified, and two broader areas (i.e. the two rural placemaking areas of Crews Hill and Chase Park).

Traveller Accommodation Needs in the Period 2020-2041

- 4.20 A further factor constraining the TLP strategy options, is the need for the TLP to identify a supply of specific, deliverable sites sufficient to provide five years' worth of sites against the locally set targets (see Planning Policy for Traveller Sites, paragraph 10a).
- 4.21 As set out at paragraph 3.5 of the Submission Draft TLP, this means that, taking into account the existing pitch shortfall, there is a requirement to identify specific, deliverable sites with a capacity for 20 permanent pitches. There is also a need to provide a specific, deliverable transit site within the Borough, which can accommodate at least 15 caravans at one time.
- 4.22 The two rural placemaking areas of Crews Hill and Chase Park have been the subject of debate at the ELP Examination, and the independent Inspector's view on these proposed placemaking areas will not be known until next year (2026). Importantly, the ELP policies for these placemaking areas (PL10: Chase Park, and PL11: Crews Hill) require comprehensive masterplans to be prepared and approved by the Council, to inform future planning applications. In advance of this masterplanning work (and indeed, in advance of the ELP Inspector's view on the Crews Hill and Chase Park placemaking areas), it would not be appropriate for the TLP to seek to allocate a specific site or sites within these placemaking areas to meet the identified five-year need for 20 permanent pitches, or the immediate need for transit provision. The risk would be that allocating specific sites for Traveller accommodation, in advance of the further masterplanning work, may adversely impact upon the deliverability of important infrastructure, as well as other important development objectives.
- 4.23 The Council is committed to progressing the masterplanning work for these two placemaking areas apace, but at this time, the Council does not consider that these areas can address (or help to address) the requirement for a supply of specific, deliverable sites sufficient to provide five years' worth of supply against the locally set targets. With the need for the masterplanning work to conclude before it would be appropriate to identify a specific site or sites, the potential need for land owner negotiations, and then the need for a planning application or applications (potentially as part of a wider proposal), the Council cannot be confident that the placemaking areas will deliver new traveller accommodation before 2031.

- 4.24 The implication, in terms of the TLP strategy options, is that the combination of sites to be allocated in the TLP to provide five years' worth of sites (i.e. sites to accommodate 20 permanent pitches, and a transit site which can accommodate at least 15 caravans at one time), must be drawn from the list of sites under paragraph 4.13 above. All of these sites are in the Green Belt, or are designated as MOL. Consequently, it is part of the Council's exceptional circumstances case that given the thorough assessment made of potential approaches to accommodating Traveller needs, sites within the Green Belt or on MOL must be allocated in the TLP, if Traveller accommodation needs are to be met in accordance with the Government's Planning Policy for Traveller sites.¹⁹
- 4.25 The Council has sought to explore and consider all options and reasonable alternatives to the strategy and sites set out in the Submission Draft TLP, but for the reasons outlined, the reasonable alternatives are extremely limited.

Brownfield Sites, Underutilised Land and Optimising Development Densities

- 4.26 The ELP evidence base demonstrates that the Council has sought to make best use of brownfield sites and underutilised land, before recourse to Green Belt land release to meet future housing, employment and other development needs (see ELP Exceptional Circumstances Topic Paper²⁰, paragraphs 4.10 - 4.22). The very recent review of potential sites within the urban area (as part of the ELP plan-making process) has inevitably served to limit the brownfield and underutilised sites that are potentially available to meet traveller accommodation needs.
- 4.27 As above, despite several call for sites, no private landowners or developers have put forward sites for traveller use (including within the urban area).
- 4.28 The sites put forward by the Council's Property Services Team (listed at paragraph 4.13 above) are all within the Green Belt or on MOL land, but some of these sites include areas of previously developed land (and land that is underutilised).
- 4.29 In terms of optimising development densities, again, the evidence base for the ELP demonstrates that the Council has sought to make best use of urban sites to meet housing and employment needs, before recourse to Green Belt land release. Having optimised development densities for each ELP allocation, for a range of land uses that

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https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

²⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0032/54995/Exceptional-Circumstances-Topic-Paper-Planning.pdf

do not include provision for Gypsy and Traveller accommodation²¹, the Council does not believe that there is scope to make more intensive use of the urban site allocations in the ELP, to enable Gypsy and Traveller accommodation to be provided alongside the planned housing and other land uses promoted in the ELP.

Promoting Sustainable Patterns of Development

4.30 The selective release of Green Belt and MOL to meet traveller accommodation needs has been informed by a site selection process (see TLP Site Allocation Topic Paper, September 2025²²), which prioritised sites best able to contribute to promoting sustainable patterns of development. Appendix 1 of the Site Allocations Topic Paper sets out the site assessment process in Table 1, with the second stage of the process being “promoting a sustainable pattern of development”. The sequential approach adopted is described, which:

- “Prioritises land in the urban area, then
- Prioritises the most accessible sites in the Green Belt (considering previously developed land first before considering greenfield sites in the Green Belt, starting with the lowest performing against the Green Belt purposes), then
- Prioritises the least accessible isolated land in the Green Belt (considering previously developed land first).”

4.31 The Council acknowledges that whilst this sequential approach is important, and assists in demonstrating the necessary exceptional circumstances for Green Belt and MOL land release to meet traveller accommodation needs, in practical terms, the limited range of sites constrained the Council’s options.

Harm to the strategic functioning of the Green Belt and MOL can be justified, and net loss has been minimised

4.32 The Green Belt and Metropolitan Open Land Study (LUC)²³ finds that all of the Green Belt land in the Borough meets at least one of the five purposes of the Green Belt as set out in NPPF paragraph 143. All of the Green Belt land in the Borough is

²¹ The exception being the proposed ELP placemaking areas at Chase Park and Crews Hill, where draft Policies PL10 (Chase Park) and PL11 (Crews Hill) do state that the provision of Gypsy and Traveller pitches must be explored, subject to the policies and proposals set out in the Enfield Traveller Local Plan.

²² <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

²³ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

considered to make a strong contribution to Green Belt purpose 5 (assisting in urban regeneration, by encouraging the recycling of derelict and other urban land).

4.33 National policy does not require all the purposes of Green Belt land to be met simultaneously, and a strong rating against any purpose on its own could be sufficient to indicate an important contribution.

4.34 In terms of the other Green Belt purposes, the Green Belt and Metropolitan Open Land Study found:

- **Green Belt purpose 1 - to check the unrestricted sprawl of the large built-up area.** 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. Further 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 is considered to be relatively close to Greater London and therefore makes at least a relatively strong contribution to purpose 1.

The Bulls Cross site sits within a parcel that makes a strong contribution to Green Belt purpose 1, and the Land Adjacent to the Ridgeway sits within a parcel that makes a relatively strong contribution to Green Belt purpose 1.

- **Green Belt purpose 2 - to prevent neighbouring towns merging into one another.** Much 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. However, in the west of the Borough there are areas of land that contribute moderately, relatively strongly, and strongly to Green Belt purpose 2.

The Bulls Cross site sits within an area that makes a weak/ no contribution to Green Belt purpose 2, and the Land Adjacent to the Ridgeway sits within an area that makes a relatively strong contribution to Green Belt purpose 2.

- **Green Belt purpose 3 - to assist in safeguarding the countryside from encroachment.** The vast majority of the Green Belt land in the Borough is open and has a strong distinction from the urban areas, and therefore makes a strong contribution to purpose 3.

The Bulls Cross site sits within an area that makes a relatively strong contribution to Green Belt purpose 3, and the Land Adjacent to the Ridgeway sits within an area that makes a strong contribution to Green Belt purpose 3.

- **Green Belt purpose 4 - to preserve the setting and special character of historic towns.** Consideration has been given to whether 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.

The Bulls Cross site sits within an area that makes a strong contribution to Green Belt purpose 4, and the Land Adjacent to the Ridgeway sits within an area that makes a weak/ no contribution to Green Belt purpose 4.

- 4.35 Evidence on the Green Belt is just one consideration in the list of matters that influence the decision-making processes to allocate sites and release them from the Green Belt – with other considerations including meeting traveller accommodation needs, heritage matters, accessibility to facilities and services and flood risk.
- 4.36 In terms of MOL, the Green Belt and Metropolitan Open Land Study (LUC)²⁴ finds that the majority of the Borough's MOL makes a strong contribution to at least one MOL criterion. The Land at A10 site is not within an area of MOL highlighted within the Green Belt and MOL Study (see paragraph 7.5) as making the greatest contribution to the greatest number of MOL criteria.
- 4.37 The main contribution of the Land at A10 site to MOL purposes, is in relation to Criterion 1 (contribution to the physical structure of London by being clearly distinguishable from the built up area).
- 4.38 It is pertinent to note that the proposed TLP site allocations would result in the removal of a total of 1.6 hectares of land from the Green Belt, and 0.3 hectares of land from the Borough's area of MOL. Presently, the Green Belt in the Borough covers an area in excess of 3,000 hectares, and there are over 580 hectares of MOL.
- 4.39 The Council's approach to minimising the amount of land to be removed from the Green Belt and MOL is multi-faceted. In summary, the approaches taken include:
- Making best use of the land proposed for release from the Green Belt and MOL, through preparation of a Capacity Assessment²⁵, which explored the capacity of the proposed allocations, through reference to best practice design principles.
 - Exploring whether neighbouring authorities are able to assist in meeting any of Enfield's Traveller needs (see Duty to Cooperate Statement).
 - The Green Belt boundaries for the site allocations have been carefully assessed and refined, to minimise the amount of land needing to be released from the Green Belt (whilst ensuring newly defined defensible boundaries, and whilst ensuring sufficient land is available to meet development needs).

²⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

²⁵ <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

- 4.40 With regard to the Green Belt land and MOL proposed for release in the TLP, a careful balance has been struck between making efficient use of the land and ensuring that the new development addresses the objective of delivering high quality traveller sites.

Provision of opportunities for beneficial use of remaining Green Belt

- 4.41 NPPF paragraph 151 requires Local Planning Authorities to plan positively to enhance the beneficial use of Green Belt land, for example, by looking to provide safe access, to improve opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, and to improve damaged and derelict land. The Green Belt and Metropolitan Open Land Study (Table 9.1)²⁶ provides an overview of the potential measures that can be applied to mitigate harm to Green Belt and MOL, and where appropriate, these measures have been taken forward, principally via the ELP.
- 4.42 ELP Policy BG7 (Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land) sets out a strategy, including a detailed list of projects that will enhance remaining areas of Green Belt, and seeks to secure the delivery of these projects from the allocated sites (as a condition of their development).
- 4.43 Policy BG7 sets out that “*Planning permission for the development of sites that have been removed from the Green Belt or Metropolitan Open Land through this plan will not be granted unless appropriate measures to enhance environmental quality and accessibility in the remaining parts of the Green Belt/MOL have been secured. These enhancements should be obtained through developer contribution or alternative means. Where enhancements have been identified as part of the Placemaking Frameworks included as part of the Local Plan, such improvements must be included in the development proposals.*”
- 4.44 Furthermore, Policy BG7 sets out that the priorities for enhancements to retained areas of Green Belt are the Proposed Enfield Chase Landscape Recovery scheme and the Lee Valley Regional Park (as shown on the Policies Map), and the green linkages to these projects. Specific enhancement projects are also set out in Policy BG7, which tie holistically into the Enfield Chase Restoration Project, to form an integrated Green Infrastructure vision for the Borough (in line with Natural England’s Green infrastructure Framework and Standards).
- 4.45 The Enfield Chase Restoration Project has already received seed funding from DEFRA as a trial for new Environmental Land management Schemes and aims to deliver a wide range of environmental, economic and societal benefits by restoring

²⁶ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

rivers, wetlands, woodlands and grassland landscapes, creating 100s of hectares of connected blue and green spaces within easy reach of millions of people. Work is ongoing as part of this project, working closely with the Environment Agency, Natural England, and the GLA to develop a detailed spatial plan of green infrastructure projects as set out in the ELP.

- 4.46 The project will restore habitats and create a new publicly accessible space for various recreational and cultural activities in a natural environment and will to cover more than 1,500 hectares, primarily consisting of farmland owned by the Council. The Enfield Chase Landscape Recovery Project offers an opportunity to re-purpose Enfield's Green Belt for the 21st century. By reinstating the land and transforming it from farmland into woodlands, meadows and wetlands, all while enhancing public access and promoting sustainable commercial activities, there is significant potential to provide a wide range of benefits.

Summary of case for strategic exceptional circumstances

- 4.47 The strategic case for exceptional circumstances to justify the altering of Green Belt and MOL boundaries can therefore be summarised as follows (with reference to the relevant paragraphs in the NPPF):
- LBE has chosen to review and alter the Green Belt and MOL boundaries in the Borough, and has fully evidenced and justified the necessary exceptional circumstances (NPPF paragraph 145);
 - The TLP Strategy and related allocations are justified, having examined all other options and reasonable alternatives for meeting the identified needs for development (NPPF paragraph 147);
 - The opportunities for development on suitable brownfield sites and on underutilised land have been fully explored, ensuring that the TLP makes as much use as possible of such land (NPPF paragraph 147, a));
 - The density of development on sites proposed for allocation has been optimised, (NPPF paragraph 147 b);
 - Neighbouring authorities are unable to assist in meeting Enfield's development needs (NPPF paragraph 147 c);
 - The allocations on land currently in the Green Belt (or designated as MOL) have been proposed following a rigorous site selection process, which gave first consideration to land which is previously developed (NPPF paragraph 148);
 - The net loss of Green Belt land and MOL has been minimised (1.9 hectares, or less than 0.05% of the current Green Belt and MOL area within the Borough).
 - The ELP (which will form part of the Development Plan for the area, alongside the TLP) seeks to positively enhance the beneficial use of remaining Green Belt land within the Borough (NPPF paragraph 151).

5 Local Level Case for Exceptional Circumstances to amend the Green Belt and Metropolitan Open Land Boundaries

- 5.1 Alongside the strategic case set out in Chapter 4 above, there are local exceptional circumstances specific to each proposed allocation. The details are provided in the TLP Site Allocation Topic Paper, including in Table 4: Post Site Selection Conclusions, which summarises the reasons for allocating the sites included in the Submission Draft TLP, and the reasons for rejecting other sites.
- 5.2 It is important to emphasise that the evidence on Green Belt and MOL harm (as set out in the Green Belt and Metropolitan Open Land Study) is only one part of the evidence base. Consequently, where harm may be caused by release of a parcel of land from the Green Belt or MOL, this finding must be balanced against other important factors that could make up exceptional circumstances, including, sustainability, accessibility, meeting development needs, viability and deliverability.
- 5.3 It is further the case that the Green Belt and Metropolitan Open Land Study considers broader land parcels, which are far larger than the proposed TLP site allocations.
- 5.4 The Site Allocation Topic Paper includes at Appendix 1 the Site Selection Methodology used by Officers in preparing the TLP. Table 1 in the Appendix sets out the site assessment process, including the sequential approach taken to promoting sustainable patterns of development. The site selection process firstly prioritises land in the urban area, followed by the most accessible sites in the Green Belt (with first priority given to previously developed land in the Green Belt), before considering greenfield sites in the Green Belt, starting with those areas that are lowest performing against the Green Belt purposes.
- 5.5 The site allocation process took into account the contribution that sites made to the purposes of the Green belt, the harm caused to the Green Belt through allocation of a site for development, the scope to create a new permanent Green Belt boundary (following allocation) and the opportunities to mitigate the identified Green Belt harm.

6 Summary and Conclusion

- 6.1 National planning policy states that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified.
- 6.2 The evidence base that underpins the TLP demonstrates a need for the provision of new traveller sites to accommodate 30 permanent pitches, and a transit site to accommodate at least 15 caravans at any one time.
- 6.3 The Council have fully explored the reasonable alternatives for accommodating traveller needs, but have found that to achieve a supply of specific, deliverable sites sufficient to provide five years' worth of sites against the locally set targets, it is necessary to release land from the Green Belt and Metropolitan Open Land (MOL).
- 6.4 This Topic Paper sets out and justifies the exceptional circumstances for the allocation of two sites currently within the Green Belt (Bulls Cross and Land at the Ridgeway) to provide at least 20 permanent pitches, and the allocation of one site currently designated as MOL (Land at A10) to meet the identified transit site need.
- 6.5 The Council do recognise that the land proposed for release from the Green Belt and MOL contributes strongly to some of the Green Belt and MOL purposes, but the site areas are very small in comparison with the overall area of Green Belt and MOL within the Borough, and a planning judgement has been made taking all factors into account (including the limited range of site options available for consideration).
- 6.6 New Green Belt and MOL boundaries can be clearly defined, using physical features that are readily recognisable and likely to be permanent (NPPF paragraph 149).
- 6.7 The loss of Green Belt land and MOL has been minimised, with the longer term need for a further 10 permanent pitches to be accommodated at either Crews Hill or Chase Park, on land that is proposed to be removed from the Green Belt through the ELP plan-making process.
- 6.8 The ELP (which will form part of the Development Plan for the area, alongside the TLP) seeks to positively enhance the beneficial use of remaining Green Belt land within the Borough (NPPF paragraph 151).