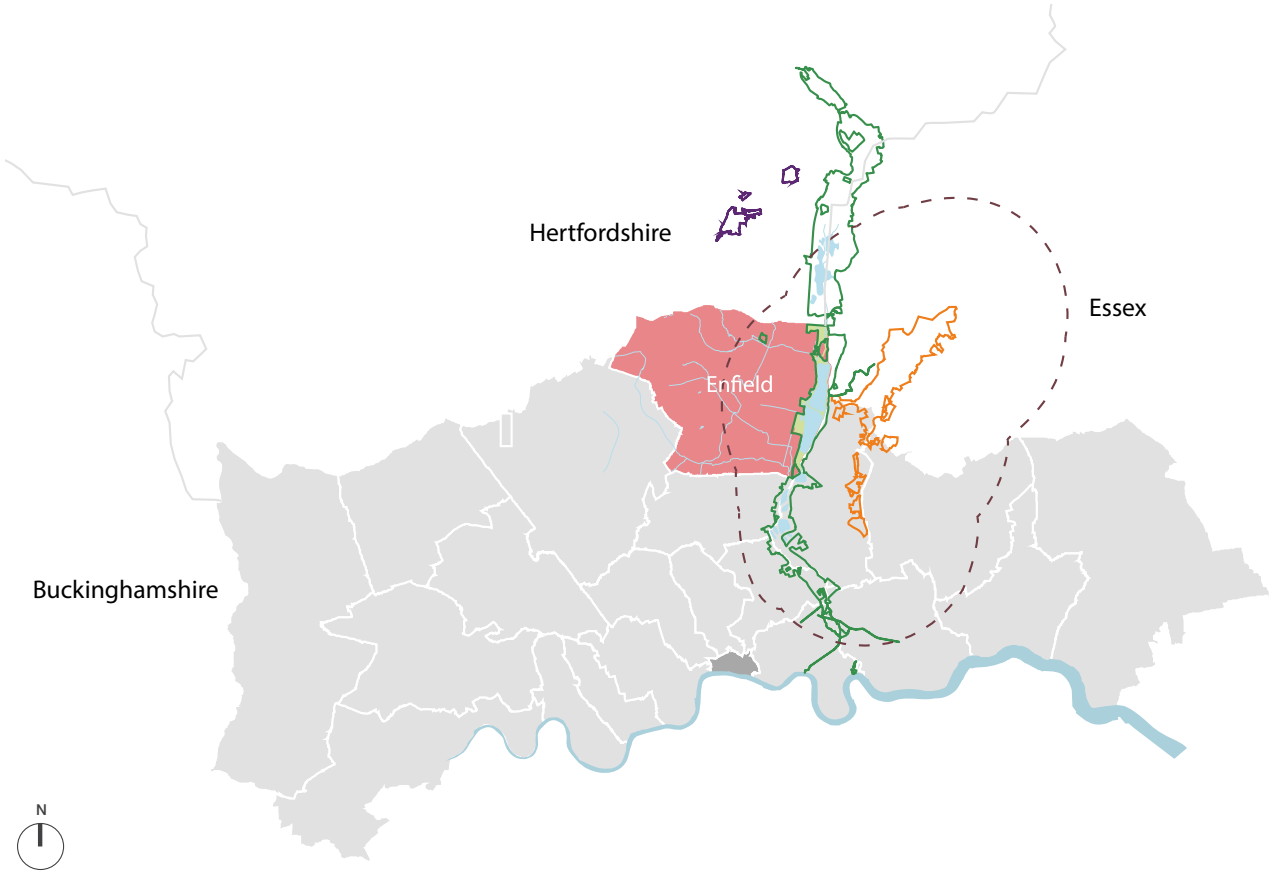
6 Blue and Green Enfield

INTRODUCTION

6.1 This chapter relates to the 'green' components e.g. parks, open spaces, woodlands, street trees and footpaths, and the 'blue' elements e.g. reservoirs, lakes and waterways, of Enfield's infrastructure. The following policies set out below explain how this network will be protected, maintained and enhanced through new development in line with the placemaking principles set out in chapter 2 of the plan and the long-term vision of Enfield as a 'deeply green and distinct place'.



Boundaries of key cross-boundary networks

STRATEGIC POLICY

BG1: BLUE AND GREEN INFRASTRUCTURE NETWORK

1. Proposals will be expected to contribute to the creation of a more integrated, multi-functional and accessible blue and green infrastructure network and address deficiencies in quantity, quality and access across the Borough. This will be achieved through:

a. protecting and enhancing areas of Green Belt and Metropolitan Open Land to maintain their function, quality and openness;

b. ensuring development protects and enhances significant ecological features, achieves biodiversity net gain and maximises opportunities for urban greening through appropriate landscaping schemes and the planting of street trees;

c. reviewing Sites of Importance for Nature Conservation and areas of biodiversity deficiency to ensure development contributes as appropriate to the Borough's nature recovery network in line with emerging statutory requirements;

d. improving the quality, character, value and accessibility of existing publicly accessible open spaces and water spaces across the Borough, in line with the priorities of Enfield's Blue and Green Strategy or successor documents;

e. maximising green grid links to enhance access through walking, cycling and public transport to key destination points (e.g. town centres), community facilities and publicly accessible open spaces, especially along rivers and waterways;

f. protecting, improving and enhancing access to blue spaces and the wider water environment and improving relationship with the river and naturalising the riverbank through the removal of hard engineered walls and culverts and introducing new habitats to the river corridor;

g. protecting and enhancing existing residential moorings located on the River Lee and River Lee Navigation;

h. maximising opportunities to create and increase publicly accessible open space and outdoor sports (including playing pitches and ancillary sporting facilities) with a range of sizes across a range of users, particularly in locations which experience the highest level of deficiency within the Borough;

i. protecting and enhancing the Borough's habitat and wildlife resources, including linking green spaces with identified wildlife corridors, protecting and enhancing species and habitats identified in the Blue and Green Infrastructure Audit and London Biodiversity Action Plan or updated equivalent, and creating new nesting and roosting sites; and

j. supporting community food growing through development and building new partnerships with social enterprise and voluntary organisations that aspire to designate important local open spaces as local green spaces.

k. maximising opportunities to preserve, enhance and better reveal the significance of Enfield's historic landscapes, including watercourses.

2. Future blue-green interventions will be prioritised in the following locations (as shown on **Figure 2.1: key diagram**) through:

a. creation of a continuous 'green-loop' – a walking and cycling route extending from the open countryside, via the river valleys, into the main urban area and

onto the Lee Valley Regional Park and Enfield Chase;

b. provision for professional and community sports, recreation and leisure facilities, including ancillary and related uses set out in Policy CL4);

c. expansion of routes into the Lee Valley Regional Park where appropriate alongside open spaces and river corridors;

d. naturalisation and catchment restoration of Salmons Brook, Turkey Brook and Pymmes Park through natural flood management

e. creation of a new publicly accessible restored landscape at Enfield Chase comprising new woodland, open space and extensive landscape restoration;

f. new continuous and publicly accessible linear parks (including Brooks Park and Edmonton Marshes) across strategic development sites;

g. grey-to-green corridors: Public realm improvements along main routes (e.g. A10, A406 and A101) and at key stations and town centre gateways, such as sustainable drainage systems (e.g. rain gardens, buffer strips and wildflower verges), civic squares and water features;

h. new crossings/bridges over the A10, A406 and Lee Valley line to overcome east-west severance;

i. sensitive restoration and enhancements of Registered Parks and Gardens (Forty Hall, Trent Park, Grovelands Park, Myddelton House Gardens and Broomfield Park) and associated visitor attractions; and

j. revitalisation of open spaces and leisure/ recreational activities at Picketts Lock and Ponders End.

EXPLANATION

6.2 As an outer London Borough, Enfield boasts some of the finest parks, gardens, woodlands and open spaces in the UK, attracting millions of visitors every year. These include:

- over 1,000 hectares of open space, making it the second largest expanse in London along with more than 330 hectares of publicly accessible natural and semi natural greenspaces[22]
- over 300 hectares of woodlands and scrublands;
- over 20,000 street trees;
- reservoirs and 6 freshwater lakes;
- the presence of the Green Belt and Metropolitan Open Land covering over 40% of the total land area;
- 41 sites of nature conservation importance; and
- approximately 100 km of watercourses, which is the longest length of any London borough.

6.3 Currently, there is approximately 1 hectare of publicly accessible natural and semi-natural green space (designated as SINCs) per 1,000 residents in the Borough. There is a similar amount of formal parks and gardens, alongside other greenspaces such as amenity space, green chains, allotments and community gardens, cemeteries and churchyards, and

[22] Enfield Blue and Green Infrastructure Audit 2020

formal outdoor sports provision which together equate to over 3 hectares of publicly accessible greenspace per 1,000 residents on average. This suggests that as a whole, Enfield meets Natural England's Headline Green Infrastructure Standards[23]. However, with just one Local Nature Reserve in Enfield at Covert Way, there is room for improvement, and with additional population growth there will be a need for both enhancements to existing green spaces and the creation of new ones.

6.4 As shown on **Figure 6.1**, Enfield's blue-green network extends from the River Lee, including the Lee Valley Regional Park, in the east to open areas of undulating landscapes and parkland in the west and north. It features good links to Central London and adjoining boroughs. However, parts of this network remain fragmented and inaccessible to the public, mainly due to physical severance like railways and roads, as well as the absence of direct routes to open spaces. The distribution of open space is notably uneven between affluent and deprived areas, and there are shortfalls of playing pitch provision, play spaces and burial spaces. The Lee Valley is largely deficient in terms of access to open space and nature[24].

6.5 Many of the Borough's conservation areas contain extensive green spaces or important incidental spaces, often designed as part of planned estates, such as Trent Park and Forty Hall. Important historic landscapes are also present at Myddelton House, Capel Manor and West Lodge Arboretum. Grovelands Park, Trent Park and Bloomfield Park are identified on the heritage at risk register and require sensitive restoration.

6.6 This policy, alongside Enfield's Green and Blue Infrastructure Strategy 2021, and Enfield's Recreational Strategy 2023, aims to promote the continued protection, management and expansion of Enfield's blue and green network as an integrated whole. This response is directed toward addressing the climate change emergency and the on-going health challenges. Detailed boundaries, which include nature conservation sites, recreational strategies parks, public rights of way, and watercourses are set out on the Policies Map.

6.7 Enfield's long-term aspiration is to become the greenest borough in London, a cornerstone of London's national park city as articulated in Enfield's Blue and Green Strategy. To realise this vision, a series of strategic or landscape-scale interventions have been identified across the Borough as identified in the key diagram to help us in achieving this goal.

6.8 Development proposals will be expected to deliver improvements to open spaces, sustainable drainage systems, river corridors, green chain links and ecological networks. These enhancements should be in line with the principles of environmental gain set out in the government's 25 Year Environmental Plan.

6.9 Enfield's Blue and Green Infrastructure Strategy should be used as a starting point to guide the provision of blue and green infrastructure within new developments. Good practice guides and tools are also available from the Mayor of London such as the All London Green Grid Supplementary Planning Guidance, and government


Pymmes Park Path

[23] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx

[24] Enfield Blue and Green Infrastructure Audit 2020

agencies, including Natural England's Climate Change Adaptation Manual and Natural Green Space Standards. Blue and green infrastructure must be an integral component of new neighbourhoods and should be seamlessly integrated into the wider network, such as the linear corridors, strategic nodes and green grid links.

6.10 We will work with developers and other partners to facilitate the implementation of projects and programmes set out in Enfield's Blue and Green Infrastructure Strategy and other relevant strategies. This collaboration will take into account the priorities identified in the latest audits and future management and maintenance arrangements. Funding will be sourced from developer contributions and various external funding sources.

- Rain gardens
- Constructed wetlands strategic opportunities
- Existing constructed wetlands
- Green links
- Green loop
- Lee Valley Regional Park
- Existing woodland
- New Parks
- Green Belt
- Metropolitan open land
- Local open space
- Watercourse

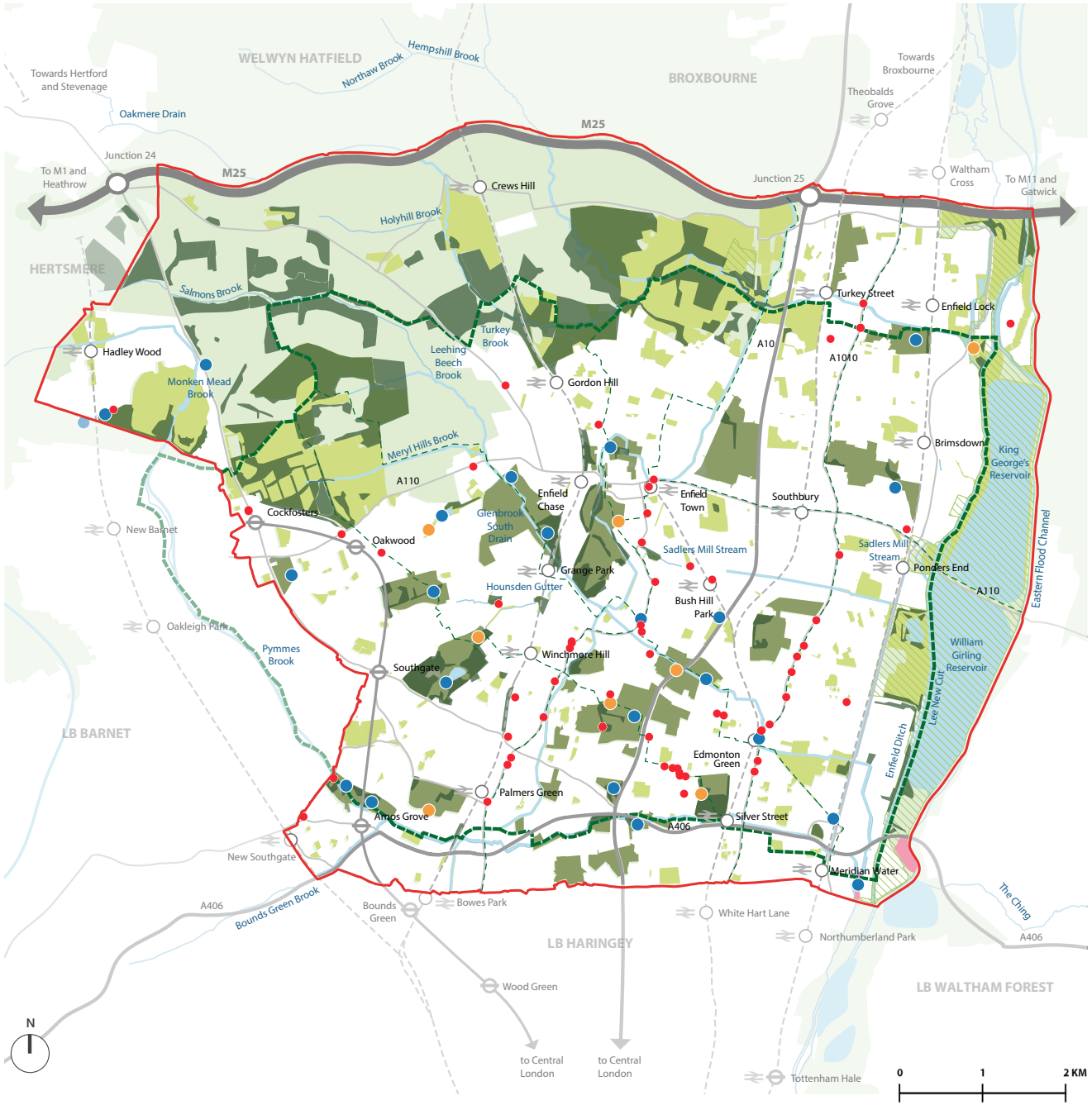


Figure 6.1: Enfield's blue and green network

Corridors of activity and movement

Strategic nodes:
1. Enfield Town
2. Meridian Water
3. Ponders End waterfront
4. Crews Hill
5. Enfield Lock
6. Edmonton Green
7. Angel Edmonton
8. Ponder End / Albany Park
9. Firs Farm
10. Forty hall
11. Whitewebbs Park
12. Broomfield Park
13. Grovelands Park
14. Trent Park

Urban green grids

Strategic links

Green Loop route

London National City Park

Lee Valley National Park

Expansion of the borough's cycle and pedestrian network

Sporting excellence

Expansion of the open spaces and route network into the Lee Valley Regional Park

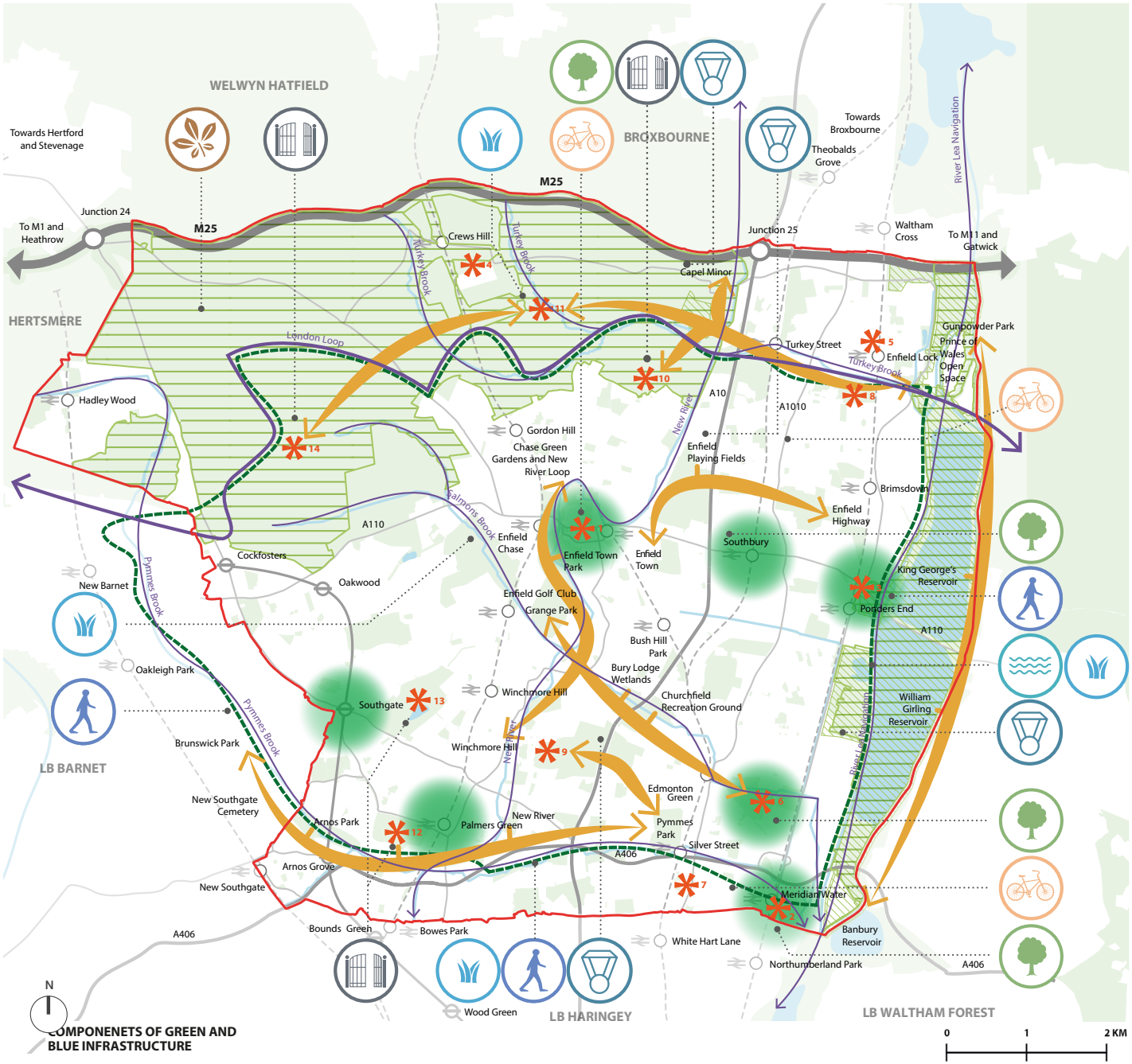
Green Loop

Enfield Chase restoration

Grey-to-green corridors

River and wetland restoration programme

Historic landscape restoration programme



COMPONENETS OF GREEN AND BLUE INFRASTRUCTURE

Figure 6.2: Components of the Borough blue and green infrastructure

STRATEGIC POLICY

BG2: PROTECTING NATURE CONSERVATION SITES

1. Development will be expected to protect, maintain and enhance the biodiversity and geodiversity value of the Borough's international, national and local wildlife and geological sites in line with the following principles:

a. where development has the potential for a likely significant effects on any Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar site (and any other sites protected under the Habitats Regulations), either alone or in combination, it would only be permitted if it can demonstrate through a Habitats Regulation Appropriate Assessment that:

i. there will be no adverse impact upon the integrity of the designated site, taking into consideration the site's conservation objectives either alone or in-combination with other plans and projects;

ii. adverse impacts on site integrity can be mitigated.

iii. where the above cannot be met, development would only be considered if it meets requirements set out in the Habitats Regulations. Applicants should, in consultation with Enfield Council as Competent Authority, and Natural England, screen applications for Appropriate Assessment.

2. Development will not be permitted where it would adversely affect (directly or indirectly) Sites of Special Scientific Interest (SSSIs). Exceptions will only be made where the benefits of the development would clearly outweigh the impacts on the special conservation features of the site and appropriate measures are provided to mitigate and/or compensate harmful impacts. Where SSSIs are essential to the conservation objectives of SACs, SPAs or Ramsar sites, for example as the underlying designations or as 'functionally linked' habitats, the requirements in paragraph 1) apply.

3. Development affecting the integrity of a Site of Importance for Nature Conservation (as designated on the Policies Map), priority habitats/species, non-designated sites or features of biodiversity interest (directly or indirectly) will only be supported where:

a. the mitigation hierarchy has been applied in line with the London Plan to offset the loss of habitats and species;

b. it will protect, restore, enhance and provide appropriate buffers around wildlife and geological features as well as links to the wider ecological network; and

c. the benefits of the proposed development would clearly outweigh the adverse impact on the biodiversity and geodiversity value of the site.

EXPLANATION

6.11 This policy sets out a hierarchy of designated and non-designated nature conservation sites, from international to local scale. As the hierarchy implies, the level of protection afforded to nature conservation varies according to the value and status of the site.

6.12 While there are no designated sites of international importance in the Borough, new development could have the potential to adversely affect the integrity of the Lee Valley Special Protection Area and Ramsar site (and any functionally linked habitat), Epping Forest Special Area of Conservation (SAC) and Wormley Hoddesdonpark Woods (SAC) from the effects of air pollution and increased recreational pressure. Development will be resisted where it would cause significant adverse harm to the integrity of these sites either alone or in-combination.

6.13 Sites of Importance for Nature Conservation (SINCs) are also known nationally as Local Wildlife Sites. SINCs have been designated as part of this Plan using up-to-date information[25], and can be viewed in the Policy Map. These designations raise awareness of its importance for wildlife particularly with regard to planning and land management decision making.

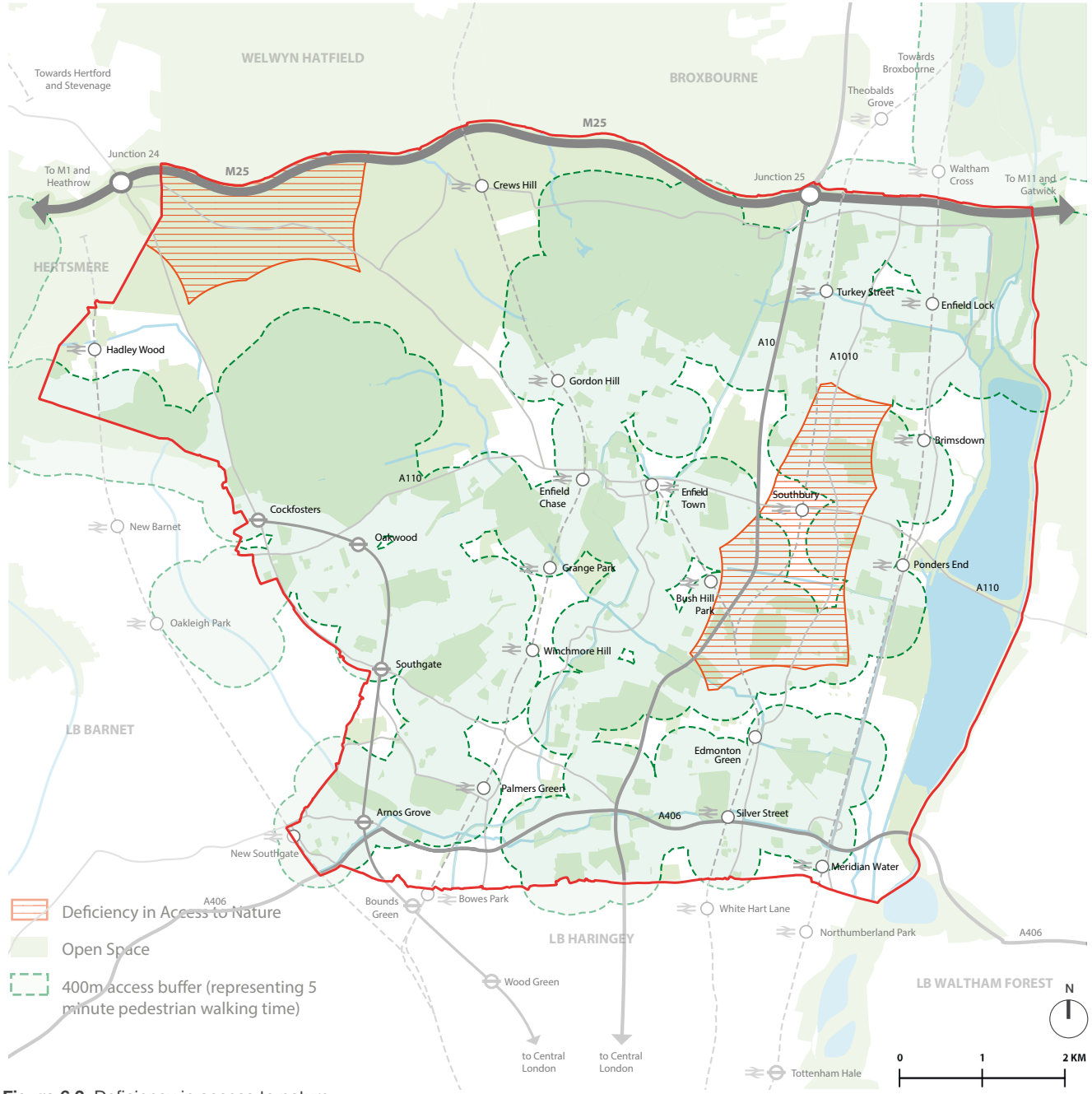


Figure 6.3: Deficiency in access to nature

[25] Review of Sites of Importance for Nature Conservation An Addendum to the Enfield Blue and Green Strategy – Land Use Consultants (November 2020)

STRATEGIC POLICY

BG3: PROTECTING EPPING FOREST SPECIAL AREA OF CONSERVATION

1. New development which will have an adverse impact on the site integrity of Epping Forest Special Area of Conservation (SAC), either alone or in-combination with other plans and projects, will not be permitted unless it can demonstrate that adequate measures have been put in place to avoid and mitigate such impacts.
2. The Council, as the competent authority, will be responsible for determining whether development would have an adverse impact on site integrity at the SAC, taking into consideration the output of an Appropriate Assessment completed in compliance with the Habitats Regulations, and having regard to representations made by Natural England.

Recreational Impacts

3. All additional residential development (including strategic allocations) within 6.2km of the boundary of the Epping Forest SAC (known as the "Zone of Influence'), will need to put in place adequate measures to avoid and mitigate potential adverse impacts on the integrity of the SAC. These must be delivered prior to occupation and in perpetuity and agreed with Natural England. To meet these requirements developments will need to meet the following requirements:

   i. All developments of one or more residential unit, including HMOs and other non C3 uses, within the 6.2km Zone of Influence will be required to make a financial contribution towards the Council's Recreational Mitigation Strategy or provide bespoke mitigation in agreement with Natural England.

   ii. All developments within the 6.2km Zone of Influence will be required to make a financial contribution towards the Epping Forest SAC Strategic Access Management and Monitoring (SAMM) Strategy per net additional dwelling, indexed in line with CIL payments from the year of implementation. This will be secured via a unilateral undertaking (UU) agreement.

4. Applicants on larger schemes outside of the Zone of Influence may also need to secure appropriate mitigation and avoidance measures in the form of recreational mitigation to offset any potential effects arising from increased recreational pressure on the Epping Forest SAC (either 'alone' or 'in combination' with other relevant plans and proposals) in consultation with Natural England, Epping Forest Conservators and other relevant bodies.
5. Over the lifetime of the Local Plan, should the Council not be able to demonstrate there is sufficient capacity for mitigation, the Local Plan will be reviewed. The Recreational Mitigation strategy will be reviewed every five years in line with this plan, and is intended to provide mitigation in perpetuity, costed at 80 years of maintenance with an endowment function intended to provide in perpetuity mitigation. Natural England reserves the right to object to planning applications where the Strategy is not being implemented, and Enfield Council will prepare a Recreational Mitigation Implementation Strategy within three

years of the adoption of this plan and will monitor SANG delivery and take-up in its Annual Monitoring Report.

6. Bespoke recreational mitigation, which is capable of demonstrating no adverse impact upon the integrity of the SAC either alone or in-combination with other plans and projects, must be agreed with the Council and Natural England. Bespoke mitigation must be in place before occupation of development, provided in perpetuity and delivered alongside SAMM contributions.

7. Air quality

See policy ENV1

EXPLANATION

6.14 Epping Forest SAC has been designated under the Conservation of Habitats and Species Regulations 2017 (as amended) due to its diverse range of habitats, including Atlantic acidophilous beech forests and wet and dry heathland, as well as its qualifying species such as the stag beetle (Lucanus cervus). The SAC is coincident with Epping Forest Site of Special Scientific Interest (SSSI), which comprises 41 SSSI units. Presently, only nine of these units are within a favourable condition, while the rest are considered to be an unfavourable condition. The core of the Epping Forest Special Area of Conservation (SAC) is situated in the Epping Forest District. However, significant areas of the SAC extend into north London, with the closest being in the London Borough of Waltham Forest, approximately 300 metres east of the Enfield borough boundary and around 1 kilometre east of the nearest developed area.

6.15 In the context of the ELP's preparation, a Habitats Regulations Assessment (HRA) has been undertaken. This assessment found that Epping Forest SAC is vulnerable to high levels of existing recreational pressure stemming from activities such as dog walking and mountain biking. It also revealed that the SAC is also sensitive to changes in air quality.

6.16 Planning applications for development that have the potential to have a likely significant effect upon a Habitats site on their own or in-combination with other plans and projects, will be subject to a HRA in accordance with the Conservation of Species and Habitats Regulations 2017 (as amended). As the competent authority, the Council will be responsible for determining whether development could have an adverse impact on site integrity within the SAC. This determination will take into consideration the output of an Appropriate Assessment, and will have regard to representations made by Natural England.

Addressing Recreational Pressures

6.17 Due to concerns over the impact of recreational pressure on Epping Forest SAC, visitor surveys were commissioned in both 2017[27] and 2019[28]. These surveys collated data on the impacts of recreation, the origins of visitors, and how the SAC is used by visitors. The evidence gathered indicated that the SAC is sensitive to threats and pressures related to public access and disturbances, including issues such as trampling, leading to soil compaction and vegetation wear, erosion, damage to veteran tree roots, excessive dog-waste, fire risks, direct damage to veteran trees and intensive mountain-biking, amongst other impacts[29]. The 2017 report identified that 75% of visitors travelled up to 6.2 kilometres to reach the SAC, and this distance was used to define a Zone of Influence (ZoI) for recreational impacts. The ZoI identified involves multiple local authorities, with seven of them contributing to over 2% of visits to the SAC. This visitor evidence base has informed the development of local plans by local planning authorities (LPAs) located within this ZoI.

6.18 To meet Habitats Regulations requirements and to demonstrate that adequate mitigation measures for avoiding and minimising potential adverse recreational impacts on the site integrity of Epping Forest SAC, the evidence from visitor surveys conducted in 2017 and 2019 indicates that a strategic recreation and access mitigation

solution must comprise the following two key components:

- Provision of suitable alternative natural greenspaces, part of a recreational strategy aimed at diverting visitors away from the SAC to prevent recreational impacts; and
- Implementation of strategic access management and monitoring measures (SAMM) directly within the SAC to mitigate on-site recreational impacts.

Strategic Access Management and Monitoring Strategy (SAMMS)

6.19 The Epping Forest Strategic Access Management and Monitoring Strategy (SAMMS) Governance and Tariff Schedule has been developed and agreed upon by all relevant parties. This strategy will ensure the implementation of mitigation measures at the SAC. It identifies the measures that are capable of being delivered within the SAC to mitigate impacts on-site. The Strategy also details the mechanisms for delivery and monitoring, including securing financial contributions from new residential developments within the ZoI. Any development resulting in a net increase in new homes within the ZOI will be subject to development contributions. The current SAMM charge per net additional unit in 2022/23 is £45, payable upon commencement. This will be annually adjusted in line with the Community Infrastructure Levy (CIL) charging schedule and reviewed as part of future plan reviews. In exceptional circumstances the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.

Recreational Mitigation Strategy

6.20 The purpose of recreational mitigation is to redirect potential new users away from the SAC, thereby preventing recreational impacts. The Council has prepared a Recreational Mitigation Strategy to provide strategic recreational mitigation for developments set out in the ELP, including allowances for unforeseen development. This Strategy to provide strategic recreational mitigation for development has been agreed with Natural England. The Recreational Mitigation Strategy includes guidance on how such mitigation can be delivered through the enhancement of open spaces, provision of green links and improvements to existing green infrastructure assets.

6.21 The Council will provide strategic mitigation capacity as set out in the Recreational Mitigation Strategy to help facilitate planning applications for development allocated in the ELP. Development contributions are required for strategic recreational mitigation in cases where there is a net increase in new homes within the zone of influence. The current estimate of recreational mitigation in 2022/23 is £406 per dwelling, to be paid upon commencement through S106 agreements or unilateral undertakings. This fee will be annually adjusted in line with the CIL charging schedule and reviewed as part of future plan reviews. In exceptional circumstances, the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.

6.22 Where developers propose a bespoke solution not included in the agreed Recreational Strategy, this will be assessed on its own merits under the Habitats Regulations and will be agreed with the Council in consultation with Natural England.

6.23 When considering the comprehensive approach outlined in Recreational Mitigation Strategy, including the rigorous monitoring at the planning application stage, project specific HRA, the co-development of a Recreational Mitigation Implementation Strategy three years from the adoption of this plan and the regular review of the wider Recreational Mitigation Strategy and oversight by the Epping Forest SAC Technical Oversight Group and SAMMS measures, Enfield Council as a Competent Authority under the Habitats Regulations 2017 can confidently conclude, based on sound scientific evidence, the absence of adverse effects due to recreational impacts arising from the ELP on the Epping Forest SAC.

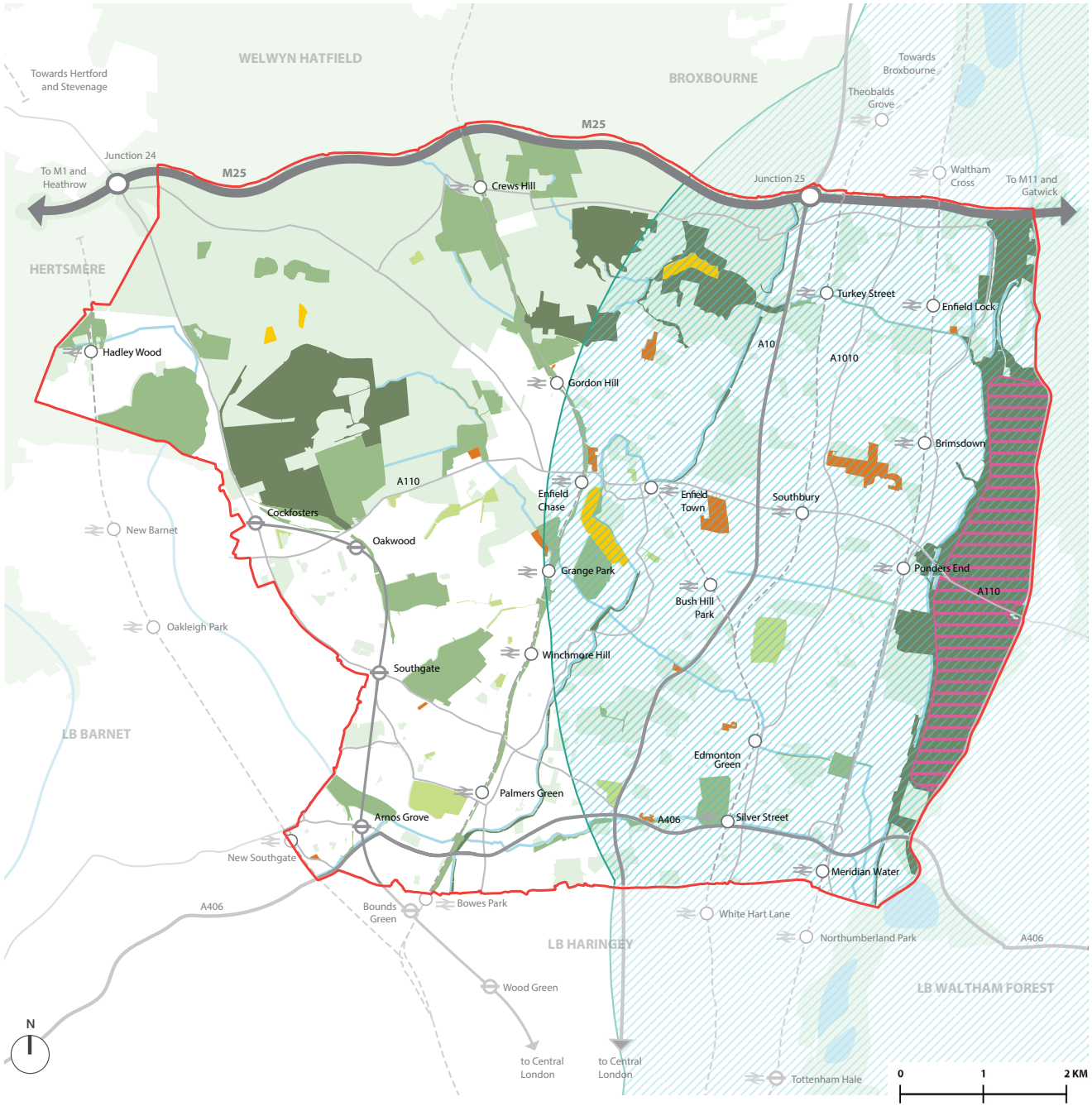
Air Quality

6.24 See policy ENV1

[27] Footprint Ecology. Liley, D., Panter, C., Weitowitz, D. & Saunders, G. (2018). Epping Forest Visitor Surveys 2017. Unpublished report by Footprint Ecology for the City of London Corporation as Conservators for Epping Forest.

[28] Footprint Ecology. Liley, D. (2020). Epping Forest Visitor Surveys 2019. Unpublished report by Footprint Ecology for Epping Forest District Council.

[29] Natural England. 2016. Site Improvement Plan Epping Forest V1.1. Available at: https://publications.naturalengland.org.uk/publication/6663446854631 42



Epping Forest Zone of Influence (6.2km)

Site of Special Scientific Interest

Sites of Importance for Nature Conservation

Metropolitan

Borough

Local

Potential new site

Proposed extensions

Figure 6.4: Biodiversity and geodiversity sites

STRATEGIC POLICY

BG4: BIODIVERSITY NET GAIN, LANDSCAPE RESTORATION AND OFFSETTING

1. All development proposals shall be considered in light of the mitigation hierarchy (avoid, mitigate and compensate) to protect most valuable ecological features of the site and minimise harm to nature. Measures will also be sought to increase or improve biodiversity through the restoration and re-creation of priority habitats and ecological networks and the protection and recovery of protected wildlife populations, especially where there are gaps across existing corridors.
2. Applicants must submit an action plan setting out how biodiversity will be improved as a result of the development to offset the loss or degradation of natural habitat on site (using the latest DEFRA metric model). The action plan will need to provide evidence of how the development will achieve a minimum of 20% net gain, including habitat creation, preferably on site. DEFRA has now confirmed a draft list of eight irreplaceable priority habitats which cannot form part of the net gain calculations and where bespoke mitigation must be agreed where harm is identified.
3. Where the 20% minimum requirement cannot be met on site, or would be better served elsewhere, adequate off-site compensation provision must be provided to an equivalent of better standard to offset the loss of habitats arising from the proposed development.
4. All proposals for biodiversity net gain in Enfield will be required to have regard to emerging Enfield Chase Landscape Recovery Strategy and subsequent London Local Nature Recovery Strategy. The Blue and Green Infrastructure Strategy sets out the evidence demonstrating that there are clear ecological benefits to investing in biodiversity net gain within Enfield. For the purposes of the Biodiversity Metric Calculation, the Enfield Chase Landscape Recovery Area is defined as having High Strategic Significance. Proposals which could lead to losses of biodiversity within the Enfield Chase Landscape Recovery Area will be resisted, even where compensatory credits can be provided elsewhere as this could compromise the area's strategic significance. Particular priority will be given towards contributions to native tree planting, river naturalisation and other habitat creation schemes in this area which compliment public accessibility.

EXPLANATION

6.25 This policy sets out how development proposals will be expected to enhance and increase biodiversity and mitigate or offset the harm arising from the loss of natural habitats (e.g. trees and river corridors) and ecological features, in response to the plan's objective to create a distinct and leading part of London. Net gain[30] is used as a proxy to measure the potential harmful effects arising from a development and calculate biodiversity net gain (e.g. habitat creation or enhancement).

6.26 The Environment Act has introduced a 10% mandatory requirement for biodiversity net gain within development, operational from January 2023[31]. The ELP sets out a higher requirement of 20% net gain to support the authority's ambitious nature recovery plans which have been recognised by the Department for Environment, Food and Rural Affairs (DEFRA), This requirement has been tested for viability impacts. Net gain measurements should be calculated using Defra's biodiversity metric (an online tool) to establish the nature of the harm to biodiversity and the quality of the new green benefits arising from development as well as the anticipated costs of achieving a 10% level of net gain. In line with best practice, the provision of compensation to address residual biodiversity impacts will not be permitted unless the steps of the mitigation hierarchy (enhance, avoid or minimise, restore, compensate and offset habitat loss) set out in London Plan have been followed and all opportunities to avoid and then minimise negative impacts have been pursued.

6.27 Developers will be expected to submit a detailed action plan to ensure that biodiversity measures can be properly considered at the planning application stage, including details of the pre-development biodiversity value of the site and the steps taken to avoid any adverse effects from development.

6.28 As a general rule, biodiversity gain should be provided on site. Where this is not practicable or viable (e.g. due to its size or location), off-site mitigation measures will be sought from developers to achieve net gain of at least an equivalent standard in line with the provisions set out in the biodiversity metric. Any contributions will be calculated on a site-by-site basis, based on the cost of mitigation.

6.29 Contributions will be sought towards enhancements to Enfield's emerging nature recovery network and the DEFRA funded Enfield Chase Landscape Recovery Programme as well as to the creation of buffer zones, removal of invasive species, planting of native species and river restoration projects (as set out in Enfield's Blue and Green Strategy and Biodiversity Action Plan). Applicants should also consider opportunities to upgrade and enhance existing sites of nature conservation importance (as shown on the Policies Map) and habitat corridors within non-designated areas. In line with DEFRA guidelines these measures will need to be maintained over a minimum of 30 years.

[30] Biodiversity net gain is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development.

[31] The government is considering how mandatory net gain will apply to different sites. There may be targeted exemption for some brownfield sites, as well as those with specific ownership characteristics, such as self-build schemes. Householder development (such as extensions) may also be exempt and the government is considering how net gain will apply to minor development schemes, including whether they are subject to a lower net gain requirement.

STRATEGIC POLICY

BG5: GREEN BELT AND METROPOLITAN OPEN LAND

1. Enfield's Green Belt and Metropolitan Open Land as designated on the Policies Map, will continue to be protected against inappropriate development. Permission will not be granted for inappropriate development (as defined by the NPPF) unless very special circumstances (VSC) are demonstrated[32].
2. Certain forms of development are not considered inappropriate in the Green Belt. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy[33], are of high quality design and protect, conserve and, where feasible, enhance areas of ecological value as well as public access.

Edge of Green Belt

EXPLANATION

6.30 The Green Belt is a permanent area of open countryside that wraps around the north and east of the built-up area of Enfield and contains a mix of arable farmland, green spaces and woodlands. Meanwhile, Metropolitan Open Land consists of strategic open areas within the built-up-area that contributes to the physical structure, including several public parks like Trent Park, Grovelands Park and Broomfield Park, as well as parts of the Lee Valley Country Park. It is important to note that Metropolitan Open Land is afforded the same status and level of protection as the Green Belt in line with the London Plan. This policy seeks to protect and safeguard the extent of the Green Belt and Metropolitan Open Land along with their fundamental qualities, as shown on the Policies Map).

6.31 Within this context, these green assets contribute to the overall suburban and rural setting of the Borough. They facilitate access to green and blue spaces, offering opportunities for outdoor sports, recreation and connectivity to the wider blue and green infrastructure network. Such areas contain diverse uses including agriculture, open spaces, wildlife sites and historic assets. These multifunctional benefits can provide ecosystem services based on a natural capital accounting approach including biodiversity net gain, recreational opportunities, flood risk mitigation, improvements to water quality, as well as other diverse cultural and health-related benefits. Following the United Nations Millennium Ecosystem Assessmen[34] these services can be broadly categorised into provisioning services, regulating services, cultural services, and supporting services. The development of these services, for example through Enfield's Landscape Recovery work with DEFRA, will complement the ELP.

[332] NPPF paragraphs 147 to 151.

[33] NPPF paragraph 149

[34] https://www.millenniumassessment.org/en/index.html

Figure 6.5: Green Belt and Metropolitan Open Land, Rural Enfield and Lee Valley Regional Park

STRATEGIC POLICY

BG6: DEVELOPMENT IN THE OPEN COUNTRYSIDE AND GREEN SPACES INCLUDING IN THE GREEN BELT AND METROPOLITAN OPEN LAND

1. Inappropriate development within the Green Belt and Metropolitan Open Land (as shown on the Policies Map) will not be permitted. Development that is not inappropriate will only be permitted where:

a. the siting, scale, height and bulk of the proposed development is sympathetic to and compatible with the primary aim of preserving the openness of the Green Belt;

b. it has regard to site contours, displays a high standard of design and landscaping to complement and improve its setting, and takes all measures to ensure that the visual impact on the wider Green Belt and historic landscape/features is minimised;

c. the nature, quality, finish and colour of materials blend with the local landscape (as defined in the Character of Growth Study) to harmonise with surrounding natural features and historic character; and

d. appropriate parking provision, safe access, egress and landscaping is provided to ensure vehicles are parked safely and that the development does not prejudice the openness of the Green Belt and Metropolitan Open Land.

2. Limited infilling within existing settlements (villages and hamlets) and the partial or complete redevelopment of previously developed sites within the Green Belt will be permitted where it can be demonstrated that:

a. the development would not lead to any significant increase in motorised traffic generation, as evidenced through a suitable traffic modelling tool,

b. the development would not have an adverse impact upon the historic character (including landscape character).

3. Agricultural, horticultural and forestry workers accommodation will only be permitted within the Green Belt and Metropolitan Open Land where it can be demonstrated that:

a. the associated agricultural unit is economically viable and has sound long-term prospects;

b. the dwelling is essential to sustain the viability of the farming enterprise;

c. there is no suitable alternative accommodation in the vicinity of the proposed site;

d. no existing dwelling serving or closely associated with the holding has been sold, leased or otherwise disposed within the past three years; and

e. it is of a scale, design and layout appropriate to its surroundings.

4. Wherever possible, worker accommodation within the Green Belt and Metropolitan Open Land should be sited as close as possible to existing buildings or dwellings.

EXPLANATION

6.32 Development that is not inappropriate in the Green Belt is defined in the NPPF. This includes some forms of development on previously developed sites, limited infilling within existing settlements and essential housing for agricultural and forestry workers. Nevertheless, there are some situations that may allow certain developments to take place in the Green Belt that under any other circumstances would not be allowed. These situations are known as 'very special circumstances' (VSC). When attempting to prove VSC, the onus is on the applicant, who must prove that the exceptional nature of the proposal outweighs the harm it might have on the Green Belt.

6.33 Applicants should, through design and access statements, demonstrate how their development has been designed to reduce the visual impact on the Green Belt. Furthermore, they should clarify how it will improve the attractiveness and quality of the landscape through implementing positive enhancements like including hedgerows and tree planting of native species. Case law indicates various factors that should be considered in these case-by case assessments, including but not limited to:

- the potential impact on both spatial and visual characteristics of 'openness', meaning the visual impact and volume of the proposal can be relevant;
- the duration of the development, including its remediability, with consideration for 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, including considerations related to traffic generation.'

6.34 Limited infill, partial or complete redevelopment of previously developed sites, and temporary accommodation will not be inappropriate, provided that they meet the criteria set out in parts 2 and 3 above and adhere to the requirements set out in national policy. Specifically, the development should not have a greater impact on the openness of the Green Belt than existing development, and should not cause substantial harm to openness where development re-uses previously developed land, while also contributing to meeting the needs for affordable housing.

STRATEGIC POLICY

BG7: ENHANCING THE BENEFICIAL USES OF THE GREEN BELT AND METROPOLITAN OPEN LAND

1. The beneficial use and management of the Green Belt and Metropolitan Open Land (MOL) will be supported, particularly where it is integrated with the wider blue-green infrastructure network and consistent with the strategic purposes of these designations.
2. 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.
3. Where enhancements have been identified as part of the concept masterplans included as part of the Local Plan, such improvements must be included in the development proposals.
4. The priorities for enhancements to retained areas of Green Belt are the Proposed Enfield Chase Landscape Restoration scheme and the Lee Valley Regional Park (as shown on the policies map respectively) and green linkages to these projects, depending on which site is most proximate to development.
5. Specific enhancements projects proposed by Enfield Council in areas of remaining Green Belt are set out below with further site specific schemes to be determined through the planning application process where necessary. These projects form part of a wider emerging vision for Rural Enfield supported by the Environment Agency and Greater London Authority [**See Policy PL9**]:

   a. Making 23 hectares of land publicly accessible as a natural burial site at Sloeman's Farm – (fully funded);
   b. Restoration of 50 ha of council-owned former Whitewebbs golf course into publicly accessible parkland and wildflower meadows and creation of habitat bank at Whitewebbs Wood, subject to planning permission – (expected to be fully funded);
   c. Making at least 60 hectares of land publicly accessible around Rectory Farm – (fully funded);
   d. Reforesting at least 60 hectares of land with 135,000 trees – (fully funded);
   e. London Loop Path – converting a 3.3km footpath from Lavendar Hill to Hadley Road to a 3m wide bound gravel path – (fully funded);
   f. Creating 50 ponds and wetland scrapers to provide valuable habitats and nature recovery – (fully funded);
   g. Salmons Brook River Restoration project – (expected to be fully funded by Environment Agency) subject to planning permission;
   h. Further foot and cycle paths and other amenity features– estimated cost £3,500,000 – full funding required through S106 subject to planning permission; and
   i. Rectory Farm Visitors Centre to include mountain biking trail centre, wild swimming lake, art trail, performance space and play features– estimated cost £5,483,400 – full funding required through S106 subject to planning permission.

6. Any compensatory improvements not set out above must be provided in accordance with the following hierarchy:

a. compensatory improvements to remaining Green Belt/MOL land in an area identified for environmental improvements as part of the Council's Green Infrastructure Audit and Strategy and in line with the emerging Spatial Vision for Enfield Chase Landscape Restoration.

b. compensatory improvements to remaining Green Belt/MOL land adjacent to, or in close proximity to, the development site; and

c. compensatory improvements to remaining Green Belt/MOL land adjacent to, or in close proximity to, the settlement or area accommodating the development.

7. In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g. as land is not available), then the Council will accept a commuted sum that it will use to undertake any further compensatory improvements and maintenance and monitoring of the schemes set out above in other areas of ownership based on an equivalent value including capital costs. Compensatory improvements should prioritise areas with low environmental quality to deliver biodiversity and wider environmental net gains.

EXPLANATION

6.35 A positive approach will be adopted in the planning of the Green Belt, provided it is consistent with Green Belt law and policy, including wider placemaking strategies and the enhancement to green infrastructure functions. Opportunities for multifunctional enhancement should focus on enhancing multiple aspects, such as natural capital, the quality of the landscape and visual amenity, recreational amenities, sustainable water management, combatting the urban heat island effect, carbon capture and storage, biodiversity, food growing or improving damaged and derelict land.

6.36 This approach should enhance the beneficial use of this land through positive management to deliver multifunctional benefits. As stipulated in Paragraph 142 of the NPPF, plans should set out ways for compensating for the removal of land from the Green Belt by offsetting compensatory improvements to the remaining Green Belt land's environmental quality and accessibility. There are a range of potential improvements that can be pursued to fulfil this requirement and the following are provided as examples, but it is recognised that there may be others:

- establishment or enhancement of green infrastructure;
- planting of woodlands;
- enhancements in landscape and visual aspects (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements in biodiversity, habitat connections and natural capital;
- development of new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

6.37 The Enfield Chase Landscape Restoration project, funded by DEFRA, aims to restore a natural landscape that brings benefits both people and wildlife. This is achieved directly through the restoration of habitats and the creation a new publicly accessible space for various recreational and cultural activities in a natural environment. It also indirectly benefits the community by supplying locally grown produce and reducing the risk of flooding in downstream urban areas. This project will look to cover more than 1,500 hectares, primarily consisting of farmland owned by the council.

6.38 The Enfield Chase Landscape Restoration 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.

DEVELOPMENT MANAGEMENT POLICY

BG8: PROTECTING OPEN SPACE

1. Development involving the loss of designated open space (with the exception of Metropolitan Open Land) will be resisted unless:

a. it provides essential ancillary facilities (e.g. changing rooms, play equipment and footpath/cycle links) that will enhance the function, use, accessibility and enjoyment of the existing open space including for underrepresented groups;

b. it is temporary in nature and the open space will be restored back to its original purpose;

c. it provides new outdoor uses, the recreational and sporting benefits of which would outweigh the harm resulting from its loss; and

d. replacement open space can be re-provided (as part of the wider development site or within a suitable alternative location within the catchment area) of equivalent or better-quality provision which is accessible to the public.

2. Developments on existing designated open space (as shown on the Policies Map) will be expected to:

a. promote the multifunctional and shared use of the existing open space, including schools, private sports facilities and playing pitches, subject to satisfactory management arrangements being put in place; and

b. avoid harm to the ecological, heritage, cultural or recreational value of the existing open space or the flood risk levels within and beyond the boundaries of the site.

3. Development will not be permitted on private or semi-private outdoor amenity space such as residential gardens and communal areas within housing estates and other similar non-designated open spaces (e.g. food growing plots) unless the loss of such space can be compensated and the development has overriding planning benefits. Amenity spaces should be designed to be flexible so it can be easily adapted in response to changing needs, such as growing food.

EXPLANATION

6.39 This policy aims to ensure that new development does not unduly harm the integrity and open character of designated open space as indicated on the Policies Map. Instead, it should contribute to the enhancement and/ or expansion of these spaces in alignment with the overarching vision of creating a deeply green place. Some types of development such as changing rooms, play equipment and seating will be acceptable in principle within areas of open space. However, these developments should be proportionate to the scale and function of the existing open space and serve to be ancillary to its main function.

6.40 In some cases, existing open space could be replaced or re-provided, particularly as part of a comprehensive redevelopment and/or estate regeneration scheme. This should be considered when it enhances the quality of open space provision within or close proximity to the development site. For instance, it could facilitate the reconnection of previously inaccessible or fragmented open areas or provide a larger and more useable area of consolidated open space. The protection of outdoor sport and recreational facilities against unjustified loss will be resisted, in line with the requirements set out in the NPPF.

DEVELOPMENT MANAGEMENT POLICY

BG9 WATERCOURSES

1. Development within or adjacent the Borough's watercourses will be expected to:

   a. avoid the net loss or covering of watercourses (unless it is a water-dependant or water-related use in appropriate locations and of appropriate scale);

   b. incorporate suitable setbacks, typically 8 metres, to protect the water's edge and contribute towards its restoration as well as active frontages along the waterfront, where appropriate;

   c. conserve and enhance views across the water and its open character; and

   d. provide ecological and biodiversity enhancements to water spaces, having regard to the principles of the Biodiversity Action Plan and the design/landscaping of the public realm.

2. Development within or adjacent to the Borough's waterspaces should promote opportunities that facilitate:

   a. continuous public access along towpaths, especially where there is fragmentation;

   b. the provision of water-related uses and sport and recreation activities, notably at Meridian Water and Ponders Lock where this would not conflict with the conservation of designated sites;

   c. sustainable and/or electric water-borne freight and passenger transport along the River Lea Navigation, where possible and where this would not conflict without he conservation of designated sites;

   d. de-culverting urban rivers to create naturalised edges, improve links to green spaces and increase the visibility of the riverside, where possible; and

   e. improved awareness and understanding of the cultural value of the Borough's watercourses

3. Permanent residential and commercial moorings (e.g. marinas and boatyards) alongside associated ancillary facilities and access requirements will be supported where they are located away from the main course of the River Lee and the Lee Navigation Canal and do not have adverse impacts on navigation, biodiversity, micro-climate, amenity of surrounding residents and the public enjoyment of the water space.

EXPLANATION

6.41 This policy seeks to protect, maintain and enhance the quality, quantity, accessibility and usage of the Borough's existing network of watercourses, as shown on **figure 6.7.** In the context of this policy, watercourses relate to any body of water, whether permanently or intermittent, that is present in the Borough, as detailed in **table 6.2.**

6.42 Collectively, these assets have played a critical role in the development of the Borough and London as a whole, acting as important trade routes, water supply hubs and sources of energy and heat. The River Lee, Enfield Lock, Lee Navigation and New River also have significant industrial heritage and nature conservation value. Nevertheless, a considerable portion of this network remains inaccessible or hidden from public view, due to factors like underground culverts, for instance, along the Salmon Brook and New River Loop/Saddlers Mill Stream), elevated embankments as seen at William Girling Reservoir and the lack of crossing points.

Table 6.2: Categories of watercourses

CATEGORY	DESCRIPTION	EXAMPLES
Watercourses	Main rivers and other smaller streams, whether they are open or culverted.	• River Lee, Turkey Brook, Salmons Brook and • Pymmes Brook (among other smaller ones)
Inland waterways	Navigable stretches of water	• River Lee Navigation
Artificial watercourses	Man-made structures originally constructed to convey drinking water to London	• New River – main section runs north-south through the Borough • New River Loop – an abandoned section which routes through part of Enfield Town and surrounds.
Reservoirs	Man-man structures which supply drinking water to London	• Lee Valley Reservoir Chain (William Girling and King George V) • Lakes (Trent Park Lower Lake and Grovelands Park) • Nearby assets (e.g. Banbury Reservoir and Lockwood Reservoir)

6.43 Any proposals seeking to improve public access to the Chingford reservoirs will need to consult with Thames Water to ensure the continued functionality and structural integrity of these sites, while also addressing potential public safety and health risks. Furthermore, some of these reservoirs are part of a network of designated sites in the Lee Valley Special Protection Area (SPA) and Sites of Special Scientific Interest (SSSI). Therefore, consultation with Natural England is likely required, particularly where changes are being made to their management, including changes in access to functionality linked habitats.

6.44 Developments situated along or in proximity to waterfront areas will be expected to provide financial contributions to deliver improvements to open spaces, natural habitats, flood alleviation and public access. This emphasis is particularly within areas that lack open spaces and nature deficiency and are suffering from fragmentation. In cases where development is located near a watercourse, it should actively contribute towards the restoration and naturalisation of the river or stream while making the most of opportunities to enhance the floodplain through natural flood management techniques.

6.45 There is a strong presumption against development which adversely affects the character and effective operation of the water network. For example, this applies when development plans involves the loss or covering of watercourse, such as culverting or the creation of development platforms. New developments should aim to maximise the benefits of their proximity to waterside areas and their natural settings.

6.46 Proposals which generate freight water-borne movements will be encouraged along the Lee Navigation, especially where industrial premises like the Edmonton Ecopark are located in the vicinity. Applicants will need to demonstrate using robust evidence that their operations will not excessively disrupt the local habitats or deterioration of water quality.

Salmons Brook

DEVELOPMENT MANAGEMENT POLICY

BG10: URBAN GREENING AND BIOPHILIC PRINCIPLES

1. New development will need to demonstrate how it will exceed the urban greening factor targets set out in the London Plan and how the green features (e.g. brown roofs and living walls) will be maintained throughout the life of the development in line with the principles of biophilic design.
2. New development will be expected to promote opportunities to restore, create and enhance Enfield's tree and woodland resource and improve links to existing assets, including the Lee Valley Regional Park, Enfield Chase, Trent Park and Salmons Brook, with priority given to:

a. densely built-up urban areas (e.g. Edmonton, Ponders End, Southbury, Brimsdown and Southgate) which are deficient in terms of access to nature, open space and woodland and experience high levels of deprivation;

b. areas of poor air quality along busy radial and orbital routes (e.g. A10, A110 and A406);

c. the arc of publicly-owned land between Enfield Chase, Crews Hill and Lee Valley Regional Park; and

d. areas of flood risk (including river corridors) to mitigate the impact of new development on the wider catchment.

3. In particular, new development will be required to:

a. retain and protect trees and hedgerows of landscape, heritage and biodiversity value on and adjacent to the site, especially those which are healthy and offer a clear public amenity benefit;

b. use available roof space and vertical surfaces to install green or brown roofs, living walls and low zero carbon technologies (subject to viability and other planning considerations);

c. maximise the provision of soft landscape treatment, amenity space (e.g. garden terraces) and new tree planting (including the use of large, shade-producing trees, pollinator friendly, non-native species and indigenous species, where possible); and

d. provide adequate separation between the built form and the trees (including having regard to shading arising from existing trees and buildings and proximity to wildlife sites).

4. Development that will involve the loss or deterioration of ancient woodland, veteran trees, ancient hedgerows, trees covered under preservation orders and other trees of significant amenity or biodiversity value, either directly or indirectly, will be resisted. Where exceptional circumstances can be demonstrated to justify the removal of such trees, adequate compensation measures must be put in place (subject to consultation with Natural England and the Woodland Trust) through a long-term management plan.
5. All new streets (including new cycle lanes and roads) should be tree-lined. Proposals to remove trees on existing streets will be resisted, in particular where they make a positive contribution to local character. Any improvements to the public realm must include a high proportion of greenery (including trees, landscaping and other types of planting) and active spaces.

EXPLANATION

6.47 This policy seeks to maximise the opportunities for encouraging the greening of both the urban and rural environments in the Borough. This enhancement can be achieved through various means, including landscaping, the establishment of new woodlands and street trees, creating garden roofs and spaces, employing soft landscaping treatments, other types of planting and restoring channelised or culverted watercourses where it is deemed as appropriate. The implementation of such measures will not only improve the aesthetic value of the Borough but also deliver multiple environmental benefits. These benefits encompass improvements in biodiversity, management of surface water run-off and attenuation, reduction of urban heat, noise attenuation, energy savings, improved insulation and water purification to remove pollutants.

6.48 The specified target is based on the urban greening thresholds and a scoring matrix set out in the London Plan. Applicants will need to meet this target or provide compelling evidence to justify why it cannot be achieved. The urban greening assessment to accompany the planning application should assign particular priority to biodiversity enhancements and measures related to climate change mitigation and adaptation. Furthermore, the assessment should outline the long-term maintenance plans for the urban greening measures. We will take a flexible approach where delivery of the urban greening factor would detract from the heritage significance of a building, monument or conservation area or historic park and garden. Urban greening should also form an integral part of the design and layout of public realm schemes and small-scale developments.

6.49 Urban greening measures, such as green or brown roofs, living walls, trees and landscaping should be seamlessly integrated into the design and layout of new developments. This integration maximises environmental benefits by promoting habitat creation, improving building insulation, supporting sustainable drainage and providing cooling effects. The specific type and extent of green roofs or living walls required will depend on factors such as the proposed development's structure, orientation, and function of the roofspace, as well as the site's character and context, such as its proximity to sensitive receptors, such as noise-intensive activities and heritage constraints. Extensive green roofs are required to have a substrate depth of 75-150mm, unless it can be demonstrated that this is not feasible. Varying substrate depth within this range maximises biodiversity benefits. For recreational or amenity spaces, intensive green roofs with deep substrates should be installed to attenuate surface water runoff and harvest rainwater on site. Further guidance on the installation and maintenance of living roofs or walls can be found in the Green Roof Organisation Code.

6.50 Applicants are advised to seek qualified expertise from a suitably qualified arboriculturist prior to the initial design phase to ensure that any works to trees are carried out in line with relevant British standards and other guidance. Where development necessitates the removal of trees and hedgerows, it must be replaced with provisions of equivalent value, following requirements set out in CAVAT, i-Tree Eco, or another similar valuation system. Where appropriate, planning conditions or legal