

Enfield's Local Plan

EVIDENCE BASE

Detailed Green Belt Boundary Review

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Contents

Boundary Review Process	2
Introduction	3
National Green Belt Policy	4
Local Context	5
Scope of Review	6
Methodology for boundary strengthening	6
Initial Findings	8
Further changes post public consultation	9

Enfield's Detailed Green Belt Boundary Review

1.0 Boundary Review Process

- 1.1 The purpose of this report is to set out the recommended boundary changes to Enfield's Green Belt boundary. The Council undertook a public consultation exercise in July 2011 to invite public comment on its initial recommended changes to the Green Belt boundary and the methodology applied.
- 1.2 The review has made an assessment as to whether the existing boundaries provide robust and defensible boundaries over the Core Strategy plan period, (next 15 to 20 years). In total, the initial findings recommended some 30 changes to the borough's green belt boundary and effectively proposes a realignment to the Green Belt boundary that results in 13 gains (additional land added 4.1 hectares (10.13 acres) into the Green Belt designation) and 17 losses (net loss of some 6.07 hectares (15 acres)of Green Belt land).
- 1.3 In total 30 responses were received to the public consultation undertaken in the summer of 2011. The responses and a summary of the comments are provided in Appendix B Schedule of Review Responses. The Council has considered all responses and provided it's response within Appendix B..
- 1.4 Of the 30 responses received, 15 comments were boundary specific, suggesting alternative boundaries to those in the initial findings report. Of these, 6 comments related to new sites being identified to the Council for exclusion from Green Belt. The remaining comments put forward alterative boundaries to those published in the Council's initial findings Appendix A. Of the 15 comments related to alternative boundaries, the Council is minded to make only 3 changes to the 30 it originally put forward by way of the initial findings.
- 1.4 Appendix A to this report highlights draft boundary amendments and clearly states where a change has occurred as a result on the public consultation exercise, for transparency. For an explanation of the Council's justification for change, Appendix A should be read in conjunction with the Schedule of Review Responses, Appendix B.
- 1.5 The changes in Appendix A have been reflected on the Draft Proposals Map that accompanies the Draft Development Management Document.

2.0 Background to the Green Belt Boundary Review

- 2.1 The Core Strategy adopted in November 2010 is accompanied by an updated Proposals Map (November 2010). The new Proposals Map carries over unchanged designations from the 1994 UDP. The strategic changes made to the Green Belt through the Core Strategy, were found 'sound' on conclusion of the examination and were limited to a de-designated section of the Green Belt land in the northeast of the Borough, known as Enfield Island Village; and the additional Green Belt designations inherited from local borough boundary changes which came into effect post the adoption of Enfield's 1994 Unitary Development Plan, (UDP).
- 2.2 Core Policy 33: Green Belt & Countryside, states the Council's intention to bring forward any proposed changes to the detailed boundary of the Green Belt as part of a subsequent Development Management Document. The Inspector's report into the examination of the Core Strategy supported this approach.
- 2.3 Historically the boundary of the Enfield's Green Belt was originally defined on the Council's UDP 6 inches to the mile hard-copy Proposals Map adopted in 1994, without the benefit of GIS digitisation. Since this time and with the advance of technology the 1994 Proposals Map (as delineated from a coarsely drawn hard-copy version) was digitised for development control purposes, with the legal boundary remaining that of the 1994 paper version.
- 2.4 The London Borough of Enfield is now in the process of preparing a Development Management Document (DMD) Development Plan Document, as part of its Local Development Framework. As part of this process it is appropriate to provide strong defensible Green Belt boundaries.
- 2.5 This review therefore examines both the accuracy and durability of the detailed inner and outer Green Belt boundary and recommends minor changes as considered necessary with the aim of securing a strong defensible boundary that will endure over the next 15 to 20 years. The review sits a part of the evidence base to support the Draft Development Management Document and proposed changes to an updated Draft Proposals Map.
- 2.6 This review is not being undertaken to release or include land of strategic nature, the justification of releases of this scale has been considered through the recently adopted Core Strategy. However, in undertaking this review there will be some minor additions and deletions to the Green Belt designation.

3.0 National Green Belt Policy

3.1 The core principles of previous National Planning Policy Guidance Note 2 (PPG2) Green Belt Protection remain firmly in place in the new National Planning Policy Framework, (NPPF). The NPPF advocates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF carries forward the five principles of National Green Belt Policy introduced in the 1950s. The popularity and success of Green Belts has resulted in them remaining a part of national planning policy. There are five equal purposes of including land in Green Belts:

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

3.2 Although the general extent of Enfield's Green Belt has been considered and justified through the adoption of the Borough's Core Strategy, the NPPF states in paragraph 83 that "local authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period".

3.3 When defining boundaries the NPPF is not as detailed as previous PPG2 but it does state authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans 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;
- 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 a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.9 The abolition of PPG2 and the replacement of core Green Belt principles within the NPPF does not warrant a need to review the detailed boundary work set out in this report and supporting appendices. Clear physical features have been used to mark the boundaries, and the review has been mindful not to include unnecessary land to keep open, as this jeopardizes the permanence of the open land in future development endeavours.

4.0 Local Context

- 4.1 The Green Belt affecting Enfield is tightly drawn around the urban area of the Borough. Almost a third of open land in Enfield is designated as Green Belt, contained around the north, north-west and east of the Borough. Green Belt land represents some 3062 hectares. This green asset is important for several reasons: its contribution to the overall suburban and rural setting; the opportunities it provides for access to the open countryside, for outdoor sport and recreation; and for the diverse uses including agriculture, nature conservation and its historic significance. The Enfield Characterisation Study (February 2011) characterises the Green Belt into 4 distinct landscape character types, 3 of which, (nos 1, 2 and 4) are also recognised as Areas of Special Character.¹
- 4.2 (1) Farmland Ridge and Valleys
The north and north-western Green Belt area which extends from Hadley Wood in the north-west corner of the Borough, across the whole of the top northern edge of the Borough to Capel Manor and Bulls Cross in the north east is characterised by Farmland Valleys and Ridges and is notably Enfield most important landscape type as it forms a special area of landscape character which is a major asset to the Borough. The Study notes the area's high landscape quality and that its designation as Green Belt has meant that the landscape has been well protected from twentieth century built development.
- 4.3 (2) Rural Parklands
Within Enfield's Green Belt two key areas have been characterised as rural parkland, Enfield Chase in the north-west and the large area of recreation land in the north-east comprising Whitewebbs Park, Forty Hall parklands, and the parklands surrounding Myddleton House. This Green Belt typology offers landscapes with strong national heritage and a focus on recreation. Within the wider environment these historic landscapes are generally widely visible forming large woodland areas which are prominent from the north and south.
- 4.4 (3) Nursery & Glasshouses
This landscape type is a relatively common type to be found in the Lee Valley given that the Lee Valley has been the centre for market gardening since the eighteenth century. Enfield has one such area which developed around the settlement of Crews Hill. Crews Hill (excluding the Rosewood Drive development), is within Green Belt. It is characterised by glasshouses, nurseries and garden centres, equine activities and little trees and hedgerow vegetation. This particular part of Enfield's Green Belt is an important feature and contributes to the local economy. However, the density of development of other associated structures is high which has had a substantial visual impact and sense of openness on this part of the Green Belt.
- 4.5 (4) River Valley and Floodplain
In Enfield the key area of the Valley and floodplain typology is the River Lee stretching across the eastern boundary of the Borough from the M25 in the north to the edge of Banbury Reservoir in the south.

¹ Areas of Special Character Review 2012

5.0 Scope of the Review

- 5.1 The integrity of the Green Belt is seriously compromised where Green Belt boundaries are constantly changing. Furthermore public confidence in Green Belt policies is dependent on their certainty and longevity.
- 5.2 The aim of the review was to examine the existing boundaries as set out in the 1994 Enfield Unitary Development Plan, in accordance with a set of criteria. The review was undertaken at the time PPG2 was current national policy and also took into account any physical changes that have occurred on the ground since 1994. The review's primary objective is to provide for a strong defensible Green Belt boundary that will endure and protect the openness and rural character of the surrounding countryside of Enfield from encroachment. The review provides an understanding of the current strengths and weaknesses of the existing Green Belt boundaries and has in turn recommended amending the boundary where appropriate to provide certainty over the next 15 to 20 years.
- 5.3 The scope was limited to a local level consideration of the Borough's detailed Green Belt boundary to the extent that it has assessed:
- The current strength of the Green Belt boundary;
 - Proposes discrete adjustments to the Green Belt boundary in order to 'strengthen' and improve its defensibility and resilience;
 - Proposes the removal of poorly performing areas;
 - Ensures Green Belt boundaries are digitised and cartographically consistent with Ordnance Survey Mapping, follow rational lines, ensuring boundaries on the ground that meet the provisions as set out in national policy;

6.0 Methodology for boundary strengthening

- 6.1 The boundary review marked the first opportunity to undertake a comprehensive assessment of the delineated boundary that protects the Enfield Green Belt. A series of analysis was undertaken, both desk-top and fieldwork, to determine the extent to which it can be secured over the long term taking account of physical events and planning decisions. The review used the criteria for defensibility to decide whether the existing boundaries were either 'strong' or 'weak'. Where boundaries were found to be 'weak' the review worked outwards to establish whether there were potentially any 'strong' Green Belt boundaries which were physically linked to existing boundaries.
- 6.2 It is important to ensure that the approach to defining these boundaries is logical, defensible and consistent. A set of criteria has therefore been devised taking account of the need to ensure that boundaries:
- are well defined using recognisable features,
 - are not excessively tightly drawn to require review before the end of the Core Strategy plan period,
 - Provide a clear delineation between marking the urban / rural interface, and
 - focus development in areas that will not adversely affect the openness of the Green Belt.

6.3 Criteria for Boundary Analysis

6.4 A strong boundary is one that is well established and resistant to change. It is difficult to alter or destroy, taking into account planning and appeal decisions. A weak boundary is one that is still identifiable/ visible, but can be easily altered or destroyed through material change or by planning and appeal decisions.

6.5 In this context a boundary is defined as a recognisable linear feature or boundary between two separate areas of land. On the basis of the principles set out above, known boundaries have been classified having regard to whether it is a strong or weak boundary with respect to how well it supports the aims of Green Belt policy. The criteria is set out in the table below:

Strong	Weak
Motorways, Adopted Highway, and local classified Roads.	Private roads Rights of way
Railway lines	
Strong natural landscape features e.g. river watercourses, lakes, Prominent ridges, blocks of woodland and strong tree lines.	Undefined natural landscape features.
Protected parks e.g. MOL, playing fields, allotments, cemeteries, local parks, amenity greenspace	Landscaped areas, incidental areas of open space, informal areas with undefined boundaries
Residential dwellings with clearly defined physical boundaries, such as an established building line or row of gardens made up of 3 or more residential properties.	Building Line where residential dwellings with unclear, undefined, intermittent back gardens
Other non-residential development with established boundaries. Can include listed, historical or areas forming part of a distinctive landscape character	Power lines Building line

Table 1: Defensible Boundary Classification

7.0 Initial Findings published for Public Consultation July 2011

- 7.1 The review divided the Green Belt into 26 study areas, represented in Appendix A by the 26 maps. The initial findings of the review demonstrated that much of Enfield's outer Green Belt is strongly defensible. For example, the entire boundary at the Borough's northern border requires no amendments, (Study areas 25 and 16) owing to the boundary following the local authority boundary and the M25 Motorway acting as a strong physical and visual boundary. Similarly, the outer eastern Green Belt boundary remains strongly defensible as it also drawn to the local authority boundaries where Enfield Borough meets Epping Forest and Waltham Forest. These borough boundaries also align with the River Lee which further physically and visually strengthens the Green Belt boundary on the east.
- 7.2 Weaker boundaries have typically been highlighted along the inner boundary where the Green Belt meets with the more urbanised character of the Borough. Typical examples include where the Green Belt boundary runs through the curtilage of properties / rear gardens. Where boundaries were found to be 'weak' the review worked outwards to establish whether there were potentially any 'stronger' Green Belt boundaries within the area which were physically linked to existing boundaries. The same criterion was used and aerial photography examined to establish 'strong' boundaries. Site visits provided a check of the results. In some cases where a strong boundary is not present a more appropriate weak boundary has been considered as a better alternative than the original. For example, in Study Area 18, site reference 18.1 Enfield Island Village – Manton Road / Ostell Crescent where a lack of a distinct property curtilage and or boundary is present, the alternative recommendation is to run the Green Belt boundary to the building line. In Study Area 10, site reference 10.2 Bramley House, a cartographic correction has also taken the boundary to the building line as opposed to property boundary to ensure the original extent of the Green Belt remains in situ.
- 7.3 In total, the initial findings recommend some 30 changes to the borough's green belt boundary and effectively proposed a realignment to the Green Belt boundary that resulted in 13 gains (additional land added 4.1hectares (10.13 acres) into the Green Belt designation) and 17 losses (net loss of some 6.07 hectares (15 acres) of Green Belt land). The majority of the recommended changes were minor in nature and are justified on the grounds of providing a more robust, logical and defensible boundary and where an adjusted alignment, or small variation, provides for a more logical or practical boundary. For example in a number of cases this includes recommending boundaries are re-aligned to adopted highways or classified roads, hedge / tree lines, property boundaries, and where relevant strong landscape features such as the New River and River Lee. There were also some instances where, for consistency, the recommendation is to align a Green Belt boundary with corresponding open space designations. Where boundary changes have been put forward, a commentary of the assessment is provided and these are set out in Appendix A.

8.0 Further Changes Post Public Consultation July – September 2011

8.1 The Council is proposing further changes following the Green Belt Boundary Review public consultation. The Review is therefore recommending 33 boundary changes in total. These changes have been highlighted within Appendix A, and now also include:

1. The boundary amendment and deletion of The Lodge at site reference: 4.4 – Hadley Wood Golf Course/Covert Wood – northern side – 32-44 Beech Hill and entry to Hadley Wood Golf Course; (See Appendix A Map 4 page 14).
2. The deletion of Green Belt land at site reference: 9.2: Enfield Chase – Royal Chace Hotel; (See Appendix A Map 9 Page 18); and
3. The boundary realignment and deletion of the Lee Navigation at site reference: 24.1 – Meridian Water - Boundary to the west of Advent Way. (See Appendix A Map 24 page 62).