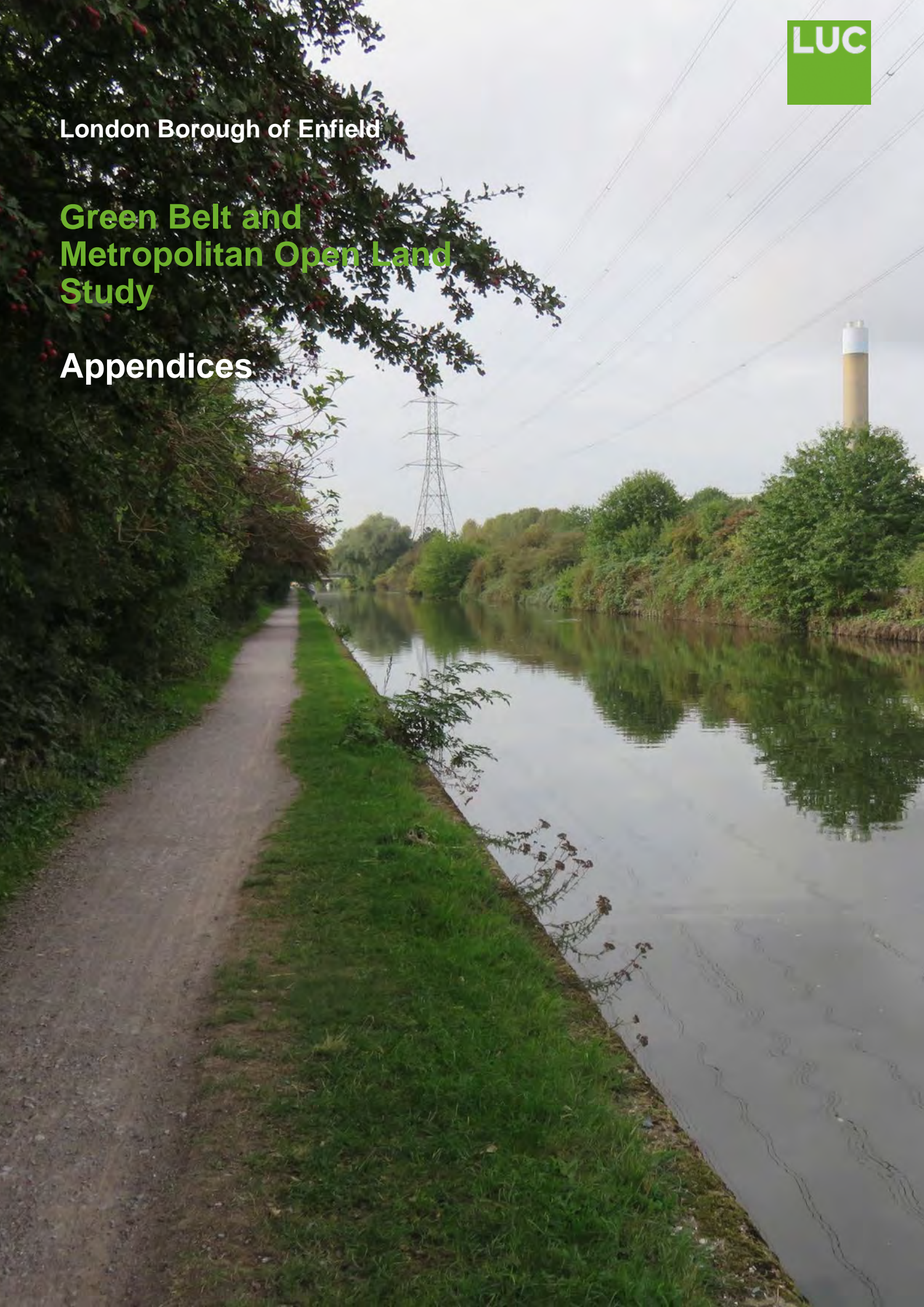


London Borough of Enfield

**Green Belt and  
Metropolitan Open Land  
Study**

**Appendices**



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**Appendix A**  
**Method Statement Consultation**  
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Consultee	Consultee Comments	Response
Historic England	<p>In general, we consider the assessment criteria and proposed methodology to take appropriate account of historic environment considerations in the context of the London Borough of Enfield and its Green Belt. We would however stress that land parcels should not solely be reviewed individually within its immediate context. A holistic approach is therefore critical in partnership with the detailed assessment of individual parcels, particularly in relation to Green Belt purposes 1 and 2 as set out at para 134 of the NPPF.</p>	<p>The first step in the Green Belt assessment is to consider what land has the potential to make a contribution to the Green Belt purposes based on location. This considers proximity to the large built-up area of London (Purpose 1), land juxtaposed between neighbouring towns including London (Purpose 2), the extent to which Green Belt land can be considered countryside in Green Belt terms (Purpose 3) and physical and visual connection to the setting and significance of historic assets of metropolitan importance (Purpose 4). In each instance, consideration is given to relevant settlements, characteristics, features and assets within and in the vicinity of Enfield.</p>
	<p>In references to the Hansard extract of relevance to the definition of 'historic towns' in Green Belt Purpose 4, the six historic towns listed do not represent an exclusive list. Clearly, there are a substantial number of historic towns elsewhere in the country where Green Belts play an important role in helping preserve their setting and special character. While we would consider that ultimately it is for the relevant local planning authority to determine which historic towns in their Green Belt any review should consider, in the context of the built form and historic environment in Enfield's Green Belt we agree with the proposed approach to consider London as a historic town.</p>	<p>Noted. London has been defined as a historic town. In establishing the contribution of Enfield's Green Belt to Purpose 4, consideration has been given to the setting of individual heritage assets – buildings, monuments, conservation areas, parks and gardens and landscapes – in so far as they relate to the character and legibility of historic London, i.e. their metropolitan importance. Assets with no recorded metropolitan significance and physical/or visual relationship with Enfield's Green Belt have been judged to make a weak/no contribution to Purpose 4.</p>
	<p>Historic England list several relevant planning applications and other documents that may be useful in understanding the relationship between the Green Belt and heritage assets, notably:</p> <ul style="list-style-type: none"> <li>■ Whitewebbs Barn</li> <li>■ Trent Park</li> <li>■ Forty Hall Park</li> <li>■ Myddleton House Park</li> </ul>	<p>Noted. All materials and resources provided have been reviewed to identify historic assets relevant to historic London and Enfield's Green Belt.</p>

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Consultee	Consultee Comments	Response
	<ul style="list-style-type: none"> <li>■ Hadley Wood Golf Club</li> <li>■ Claysmore Lodge</li> <li>■ Myddleton House Farmhouse</li> <li>■ Capel Manor</li> <li>■ Cockfosters Water Tower</li> <li>■ 1 Cooks Hole Road</li> <li>■ Enfield Crematorium</li> <li>■ Rendlesham Viaduct</li> </ul>	
	The involvement of the borough's own conservation staff would benefit the development of the document and the wider elements of the Local Plan.	Enfield Borough officers have reviewed each study output in draft, including the study brief, the method statement and final report.
Natural England	Natural England had no comments to make on the consultation.	Noted.
Highways England	Having examined the consultation document, Highways England are satisfied that the policies within the document will not materially affect the safety, reliability and / or operation of the Strategic Road Network. Accordingly, HE did not offer any comments on the consultation at this time.	Noted.
Hertfordshire Country Council	Hertfordshire Country Council had no comments to make on the consultation.	Noted.
Kevin Hinds Architects	Kevin Hinds Architects had no comments to make on the consultation, except a general request to receive the timeline for the process that will eventually result in identifying sites within the Green Belt that will not be subject to Green Belt policy and also confirmation about whether the process will involve changes to the Local Plan, further public consultation and a public enquiry.	Noted. The Local Development Scheme for the new Enfield Local Plan is available at: <a href="https://new.enfield.gov.uk/services/planning/local-plan/#7">https://new.enfield.gov.uk/services/planning/local-plan/#7</a>
	The method statement needs to be clear as to the purpose of the Green Belt review. Is it to determine which land is most appropriate for Green Belt release	The overall purpose of the study is to undertake an independent, robust and transparent assessment of the Green Belt land and MOL in the

Appendix A  
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Consultee	Consultee Comments	Response
Savills on behalf of Corner Homes Group Land at Vicarage Farm	<p>to meet housing targets or is it to assess whether land is serving the five purposes for including land in the Green Belt? If it is the latter this needs to be clear and recognise that the study may just reach the conclusion that all the land is meeting some of the five tests and should therefore remain within the Green Belt. The consultee believes the most appropriate approach is for the review to consider which areas of Green Belt in Enfield are suitable for release from the Green Belt and subsequent strategic development which will enable the council to clearly assess which sites are more suitable for release.</p> <p>The methodology also needs to take into account other factors when assessing which sites are most appropriate for Green Belt release such as whether it would constitute sustainable development.</p>	<p>borough in line with national policy, guidance and case law. The study outputs identify the areas of both designations likely to be least or most harmful to the purposes of Green Belt or criteria of MOL if released from the designation.</p> <p>Paragraph 1.6 states: <i>'These outputs inform only part of a necessary exceptional circumstances case for making alterations to Green Belt and / or MOL boundaries. As such, the study does not recommend where Green Belt and MOL boundaries should be altered. To build a complete and robust exceptional circumstances case, consideration must also be given to the outputs of this study in combination with other important elements of the borough's Local Plan evidence base, including the borough's urban capacity study, the Local Plan Sustainability Appraisal as well as the deliverability of preferred site options.'</i></p>

Consultee	Consultee Comments	Response
	<p>The method statement states that it is important that the borough considers when and how the Green Belt and MOL could be enhanced, particularly the relationship between the borough's preferred sustainable pattern of development and the designations potential for new and improved appropriate uses. It is the view of the consultee that this should be inherent within the Green Belt review rather than considered separately afterwards.</p>	<p>This study is not a Green Belt review. The study outputs identify the areas of both designations likely to be least or most harmful to the purposes of Green Belt or criteria of MOL if released from the designation.</p> <p>Paragraph 8.5 states: <i>'The borough's evidence base covering green and blue infrastructure, open spaces, sport and recreation, ecology, landscape and townscape, climate change and flood risk and the historic environment will all need to inform policy on where and how the borough's Green Belt and MOL are enhanced over the Plan period and beyond. Once all appropriate evidence has been gathered and the borough has identified its preferred sustainable pattern of development, if the borough's preferred spatial strategy includes the release of Green Belt or MOL and the necessary exceptional circumstances for release have been identified, this Study will help identify appropriate synergies between compensatory improvements to the Green Belt and MOL and minimising harm to the designations.'</i></p>
	<p>Vicarage Farm is considered to be a more sustainable location than Crews Hill which is identified in the draft new Local Plan Issues and Options. This demonstrates the need to examine all factors when assessing which land is most suitable for Green Belt release.</p>	
	<p>In regard to the harm assessment, when assessing the overall harm on the Green Belt there also needs to be commentary on the sustainability in terms of access, flood risk etc. This will enable the Council to take a balanced view.</p>	

Consultee	Consultee Comments	Response
	<p>The consultee is concerned about the approach to purpose 1 as the interpretation does not take into account individual circumstance. For example although Vicarage Farm is on the edge of the large built up area, Trent Park and Trent Park Golf Club lies to the west which provides a natural defensible boundary and will check sprawl.</p>	<p>Paragraph 4.63 states: <i>'The relationship between land within the Green Belt and inset developed land is considered in terms of Green Belt land's distinction from the inset urban edge. Openness and landform/landcover are common factors that affect all the Green Belt purposes, and their consideration allows for a finer grain of assessment which cannot be achieved through consideration of the broader applicability of the purposes alone...'</i></p> <p>Paragraph 4.70 states: <i>'The distinction between land within the Green Belt and developed land considers five interrelated elements which are considered in the following paragraphs. These are:</i></p> <ul style="list-style-type: none"> <li>■ Boundary features;</li> <li>■ Landform and land cover;</li> <li>■ Views;</li> <li>■ Distance; and</li> <li>■ Urbanising influence.'</li> </ul> <p>Although contribution to Purpose 1 is generally greater in close proximity to the large built-up area, a lack of distinction between Green Belt land and the large built up area will diminish contribution to this purpose.</p>
	<p>The consultee also provided an assessment of the Vicarage Farm site against the purposes of including land in the Green Belt.</p>	<p>Noted. The overall purpose of the study is to undertake an independent, robust and transparent assessment of the Green Belt land and MOL in the borough in line with national policy, guidance and case law.</p>
<p>Wallbrook Planning on behalf of Anglo Aquatic Plant co.</p>	<p>The inclusion of references to Inspectors' letters and reports is supported however, there is the potential to incorporate more up to date reports and decisions being more relevant and applicable.</p>	<p>Noted. LUC keeps a watching brief on all relevant Planning Inspectorate reports and case law. Relevant updates are included in this final report.</p>



Consultee	Consultee Comments	Response
	<p>A common feature of previous LUC Green Belt reviews was the inclusion of a clear methodology by which the boundaries of land parcels for assessment are identified. Although Table 4.1 clearly defines the characteristics of differing strength boundary features, the method statement as a whole fails to clearly specify how these boundaries will be applied to identify land parcels for assessment.</p> <p>Wallbrook Planning suggest including a detailed outline of the relative strengths of boundaries that will be considered at each scale of land parcel. Assessment of smaller parcels should take greater consideration of moderate and even weaker boundary features as these will have increasing influence and impact on the character of Green belt land as the parcels decrease in size.</p>	<p>Paragraph 4.8 states: <i>'The extent of the assessment area around each settlement has not been predefined but has been determined by applying a process that, working out from each inset settlement edge assesses and parcels land out to a point beyond which development would result in a high level of harm to the Green Belt purposes.'</i></p> <p><i>The assessed contribution of land to the Green Belt purposes is combined with the impact of its release on remaining Green Belt land to determine an overall assessment of the harm of releasing land from the Green Belt. These variations in harm are reflected in the definition of either a parcel or a sub parcel.'</i></p> <p>In other words, the assessment, considering contribution to each Green Belt purpose and openness, is undertaken before parcels are defined so that parcel boundaries reflect all notable strategic variations in harm.</p> <p>The strength of boundary features represents one of several important considerations in the assessment.</p>
	<p>The role and importance of previously developed land is not appropriately addressed in the proposed methodology. There is little in-depth consideration of the effect PDL has on the performance of Gren Belt land. The proposed methodology should take better consideration of PDL in assessing the performance of Green Belt parcels. A clear and concise stage of the Green Belt assessment should be added to cover the PDL status of assessed parcels.</p> <p>Crews Hill is of merit for consideration as an area of PDL. The Method Statement fails to appropriately identify Crews Hill as a settlement only partly inset from the Green Belt. Sites such as Anglo Aquatic, which have strong arguments demonstrating weakly performing Green Belt, need to be appropriately assessed in the Review.</p>	<p>Paragraph 4.64 states: <i>'The NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. The presence of 'urbanising development' within the Green Belt can increase the relationship between Green Belt and an inset settlement and diminish the contribution of land to the Green Belt purposes.'</i></p> <p><i>'Urbanising development' is defined in paragraph 4.61 "as development which, with reference to the lists provided in paragraphs 145 and 146 of the NPPF, is considered 'inappropriate' and therefore has an 'encroaching' effect on Green Belt land.'</i></p> <p>In other words, not all PDL is inappropriate in Green Belt terms, but the presence and influence of inappropriate development in the Green Belt is a key consideration throughout all stages of the assessment.</p>

Consultee	Consultee Comments	Response
	<p>A further topic that is not suitably addressed in the methodology is the sustainability of land parcels in the Green Belt. The relative sustainability of certain areas is fundamental to assessing and identifying the areas of Green Belt land most suitable for release. The methodology proposed should include a criteria for sustainability to assess each parcel.</p> <p>The Inspector's letter to St Albans District Council stated, 'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport'.</p>	<p>Paragraph 1.6 of the method statement states: <i>'These outputs inform only part of a necessary exceptional circumstances case for making alterations to Green Belt and / or MOL boundaries. As such, the study does not recommend where Green Belt and MOL boundaries should be altered. To build a complete and robust exceptional circumstances case, consideration must also be given to the outputs of this study in combination with other important elements of the borough's Local Plan evidence base, including the borough's urban capacity study, the Local Plan Sustainability Appraisal as well as the deliverability of preferred site options.'</i></p> <p>The definition of the borough's 'sustainable pattern of development' will consider the benefits of developing PDL and accessible land both within and outside the Green Belt.</p>
	<p>The Green Belt review should be to a sufficiently detailed scale. Further detail should be added in terms of identifying sub parcels and how they will be assessed.</p> <p>Areas of less openness could be expanded to also include consideration of sub parcels that are well contained due to strong boundaries.</p>	<p>The study represents a comprehensive and detailed assessment of all Green Belt land and MOL in the borough. All strategic variations in contribution and harm will be identified, mapped and reported in assessment proforma. Paragraphs 4.96 states:</p> <p><i>'Sub-parcels are identified within parcels to identify opportunities to potentially reduce harm to the Green Belt purposes, through release of only part of a parcel. Sub-parcels are identified in locations where:</i></p> <ul style="list-style-type: none"> <li>■ There is a small variation in harm within the wider parcel;</li> <li>■ There is a small area of land with variation in harm from the wider parcel; or</li> <li>■ There is limited openness within part of a parcel due to the presence of development.'</li> </ul>
	<p>General comments made by Wallbrook Planning as above.</p>	<p>See responses above.</p>

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Consultee	Consultee Comments	Response
Wallbrook Planning on behalf of Fonthill Care  Trent Park Equestrian Centre	Trent Park Equestrian Centre used as an example of how smaller land parcels can be omitted or not assessed appropriately.  The Method Statement identifies the centre as Local Open Space, for which it does not meet the definition.	Noted. See responses above.  Local Open Space is not being treated as an absolute constraint and so does not impact or influence our assessment of Green Belt harm. The Centre falls within a designated Local Open Space in the Enfield Local Plan Proposals Map.
Hertsmere Borough Council	Paragraph 4.12 states that the study is comprehensive of all GB in the borough, however it is also stated it is focussed on the areas around settlements and that the assessment stops at the point at which an assessment of high level of harm has been made. Sites may well be promoted in areas away from the edge of existing settlements and it may be some could be in areas of GB where harm would be less than areas closer in.  Clarification needed as to whether Sites of Importance for Nature Conservation are an absolute constraint, as the method statement is conflicting.	The study assesses all Green Belt land within the London Borough of Enfield and identifies all strategic variations in Green Belt harm. Generally, harm will typically increase with distance from settlement edges, as the release of larger areas clearly has more potential to weaken the integrity of the Green Belt by extending into areas that have a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside.  <i>Paragraph 4.8 states: 'The extent of the assessment area around each settlement has not been predefined but has been determined by applying a process that, working out from each inset settlement edge, assesses and parcels land out to a point beyond which development would result in a high level of harm to Green Belt purposes. Analysis is provided to support the high harm judgements for areas beyond this point.'</i>  Areas of lower openness are identified away from the settlement edge where they affect Green Belt land's contribution to the Green Belt purposes. Therefore, these areas will be drawn out as separate parcels and their harm of release, while likely to remain high will be assessed separately.  Sites of Importance for Nature Conservation are not considered an absolute constraint.

Consultee	Consultee Comments	Response
	<p>Considered that development on the edge of a large built up area would not necessarily constitute sprawl if for example it is an area surrounded on three side by the built up area.</p>	<p>Land on the edge of a large built up area which is contained by development is captured as part of the assessment of distinction from the inset area. If an area is contained its distinction will be lower and this will consequently impact upon its contribution to the Green Belt purposes.</p>
	<p>In assessing contribution to purpose 2, the close proximity of settlement to each other may increase the importance of Green Belt land between them, even if it is less open than other parts of the Green Belt.</p>	<p>Paragraphs 4.31 - 4.33 state: <i>'...it is generally acknowledged that the role open land plays in preventing the merging of towns is more than a product of the size of the gap between them. Assessments therefore usually consider both the physical and visual role that intervening Green Belt land plays in preventing the merging of settlements.</i></p> <p><i>Both built and natural landscape elements can act to either decrease or increase perceived separation. For example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.</i></p> <p><i>This study identifies that land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – i.e. the more fragile the gap, the stronger the potential contribution to this purpose of any intervening open land. Physical proximity is the initial consideration; however, where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. that the characteristics of the open land relate more to the towns areas themselves than to the open land in between. Where this is the case, the impact of release of land for development on Purpose 2 may be reduced.'</i></p>

Consultee	Consultee Comments	Response
	<p>The text in the method statement indicates the contribution to purpose 3 does not equate to extent of built development. Hertsmere's GB review considered that the extent of built development together with a more qualitative assessment of character impacts on the degree to which GB can be characterised as countryside.</p>	<p>Noted. The representation is referring to paragraphs 4.17 – 4.20 in the Method Statement (4.42 - 4.45 in this report) which explain where Green Belt land is likely to play a role with regards to Purpose 3. This focusses exclusively on whether the Green Belt land constitutes countryside based on its relationship, or indeed lack of relationship, with the urban edge and land uses associated with the urban edge. However, contribution to Purpose 3 is a product of relevance to Purpose 3 (Step 1) and the influence of openness and distinction from the urban edge (Step 2), i.e. both are considered.</p>
	<p>In regards to purpose 4 Hertsmere considered that the relationship between the fringes of towns and the surrounding Green Belt is a factor in considering the contribution of a GB parcel to this purpose. Hertsmere has taken the view this purpose only applies to the larger / higher order settlements and that a physical relationship between the designated historic parts of towns and adjoining GB (immediate context or availability of views) has to exist for the purpose to be relevant.</p>	<p>Noted.</p>
	<p>In regards to table 4.5 is it not possible that an area being assessed could perform better than the adjoining / surrounding GB but that its release would impact on the adjoining area, making that adjoining area weaker than it already is?</p>	<p>Yes, although paragraph 4.91 acknowledges that '<i>The extent of this impact upon the adjacent land that remains designated as Green Belt is limited by the strength of adjacent Green Belt land in relation to the Green Belt purposes. For example, the increased containment of land that is already judged to have limited distinction from the urban edge, and therefore plays a relatively limited role in relation to the Green Belt purposes, will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside, and therefore plays a more significant role in relation to the Green Belt purposes.</i>'</p>

Consultee	Consultee Comments	Response
<p>Landsdown Land on behalf of Brookbank Stables</p>	<p>The Green Belt review provides the ideal opportunity to consider sites or areas of well contained previously developed land that could be designated as a major development site or the Green Belt boundary assessed and altered.</p> <p>The method statement fails to appropriately identify Crews Hill as a settlement only partly inset from the Green Belt. The level and bulk of PDL on many plots is a strong argument in favour of release.</p>	<p>This study is not a Green Belt review. The study outputs will identify the areas of both designations likely to be least or most harmful to the purposes of Green Belt or criteria of MOL if released from the designation.</p> <p>Paragraph 1.6 of the method statement states: <i>'These outputs inform only part of a necessary exceptional circumstances case for making alterations to Green Belt and / or MOL boundaries. As such, the study does not recommend where Green Belt and MOL boundaries should be altered. To build a complete and robust exceptional circumstances case, consideration must also be given to the outputs of this study in combination with other important elements of the borough's Local Plan evidence base, including the borough's urban capacity study, the Local Plan Sustainability Appraisal as well as the deliverability of preferred site options.'</i></p> <p>The definition of the borough's 'sustainable pattern of development' will consider the benefits of developing PDL and accessible land both within and outside the Green Belt.</p>
	<p>Greater work is needed to ensure the methodology appropriately identifies smaller parcels for assessment and further development is needed to ensure larger areas of potentially weak Green Belt are not inadequately considered due to previous classification of settlements.</p>	<p>The study represents a comprehensive and detailed assessment of all Green Belt land and MOL in the borough. All strategic variations in contribution and harm will be identified, mapped and reported in assessment proforma.</p>
<p>Iceni Projects on behalf of Fairview Homes  Land south of Enfield Road</p>	<p>Given the amount of existing space between London and the surrounding towns arising from a relatively close knit settlement pattern, it is important that reducing the distance between these settlements and London form an important consideration within the Green Belt assessment, even if the settlement fall outside of the borough boundary.</p>	<p>The settlements in Broxbourne in close proximity to the London Borough of Enfield's Green Belt are contiguous with the large built up area of London, e.g. Cheshunt. Having reviewed the neighbouring Green Belt assessments from Hertsmere and Epping Forest, only Waltham Abbey and Potters Bar are considered to be close enough to the Green Belt in Enfield to constitute towns for the purpose of this study, in addition to London. However, gaps between suburbs within the urban edge will also</p>

Consultee	Consultee Comments	Response
	<p>The methodology does not cover the potential impact on reducing openness between the metropolitan area and the Broxbourne settlements which are closest. This must be rectified in the final version of the document.</p>	<p>be considered to contribute to this purpose if they are found to preserve distinctions in the character of different areas, notably the strategic gap created by the Lee Valley Regional Park.</p> <p>Furthermore, regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger 'towns'.</p>
	<p>If a key objective is to preserve the openness of the Green Belt there would appear to be limited potential for the introduction of a new settlement away from the edge of Enfield.</p>	<p>Any loss of openness as a result of Green Belt release would result in harm to the Green Belt. The purpose of the study is to draw out variations in the likely significance of this harm with a view to informing decisions on the most appropriate locations for Green Belt release in Green Belt terms.</p>
	<p>The Methodology describes Crews Hill as 'part of' or 'contiguous with' the metropolitan urban area, which is incorrect as it is separate from the metropolitan area. It is also noted that Crews Hill is also only partly inset and the majority is washed over and therefore it would be more appropriate to classify Crews Hill under the 'washed over by Green Belt' Category.</p> <p>No reference is made to the dense Whitewebbs Forest and further tree cover that forms part of Hilly Fields Park which separates Crews Hill from the metropolitan area.</p> <p>Noted that the assessment of Crews Hill as contiguous with London is contradicted in Chapter 4.</p>	<p>Noted and agreed that Crews Hill was incorrectly listed in paragraph 3.15 of the Method Statement as part of or contiguous with the metropolitan urban area. However, Crews Hill has been correctly assessed as an inset settlement in its own right, including the washed over development that surrounds the inset area.</p>

Consultee	Consultee Comments	Response
	<p>Unclear what the approach is in terms of assessing individual parcels or sites. The approach of working out from settlements would not reflect a realistic assessment of potential sites to be developed and would miss opportunities to develop sites what would have limited harm to the Green Belt if released in isolation.</p> <p>SHLAA sites should be the starting point for parcel subdivision as this reflects the areas that are most likely to be developed.</p>	<p>Paragraph 4.10 states: ‘<i>Green Belt locations identified in the borough’s “Call for Sites” will not directly assessed in this study, which is a comprehensive study of all Green Belt in the borough. However, overlapping reasonable site options with the variations in harm identified in this study will provide a high-level indication of the likely harm of releasing site options in isolation.</i>’</p> <p>Paragraph 8.1 goes on to say, ‘<i>This study will be used alongside other pieces of evidence to establish the necessary exceptional circumstances for making alterations to the designations’ boundaries (if required) and then identify preferred site options and reasonable alternatives for release within the designations. Once a preferred spatial strategy has been identified, consideration can be given to the harm of releasing specific sites or combinations of sites (if necessary).</i>’</p>
	<p>In regards to purpose 2, Broxbourne should be considered as a neighbouring Borough and special consideration needs to be given to Cuffley, Goff’s Oak and Cheshunt. The LUC Green Belt Study in Welwyn Hatfield included a local purpose assessing the impact on the spatial pattern of Cuffley and Goff’s Oak given the relatively small separation distances between the settlements. This could be included in Enfield where a significant impact on the settlement pattern could still take place of not properly assessed.</p>	<p>The settlements in Broxbourne in close proximity to the London Borough of Enfield’s Green Belt are contiguous with the large built up area of London, e.g. Cheshunt. Having reviewed the neighbouring Green Belt assessments from Hertsmere and Epping Forest, only Waltham Abbey and Potters Bar are considered to be close enough to the Green Belt in Enfield to constitute towns for the purpose of this study, in addition to London. However, gaps between suburbs within the urban edge will also be considered to contribute to this purpose if they are found to preserve distinctions in the character of different areas, notably the strategic gap created by the Lee Valley Regional Park.</p> <p>Furthermore, regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’. This was relevant in the assessment of Cuffley and Goff’s Oak in the Welwyn Hatfield Study;</p>



Consultee	Consultee Comments	Response
		however, these settlements lie a significant distance from the Green Belt land within the London Borough of Enfield and so are not relevant to the assessment of Purpose 2 in Enfield.
	In regards to purpose 3 there are concerns that by overly focusing on a site's individual character then the fact that it is surrounded on three sides by development would not be the overriding consideration.	<p>The character of the land itself if not considered with regard to purpose 3. For example, an area of scrubland is not considered to be any less 'countryside' than a field or woodland. However, land uses associated with the urban edge, for example floodlit sports pitches, are considered relevant in so far as they have a diminished relationship with the open countryside compared to the urban area. Similarly, if an area of land contains inappropriate development, this impacts the extent to which it is considered countryside.</p> <p>An area's containment is considered as part of its distinction from the urban area, which impacts an area's contribution to the purposes of Green Belt, including purpose 3.</p>
	In regards to purpose 4 the view is that considering London as a historic town would not be appropriate.	Noted.
	In regards to infill development, the methodology seems to suggest that unconstrained Green Belt land on the edge of inset settlement will be developed and thus can't be considered open. This needs further clarification as it suggests that any land adjoining an inset settlement will essentially be considered a weakly performing parcel and no other assessment is required.	<p>The representation makes references to paragraph 4.41 in the method statement, which was poorly worded. The paragraph (4.62 in this report) has been amended to read:</p> <p><i>'Assessing the impact of releasing Green Belt land requires an assumption that the released land would result in a loss of openness, unless the development of such land is constrained by other factors or designations. The significance of the loss is relative to the existing openness of the Green Belt land.'</i></p>
	General comments made by Icen Projects as above.	See responses as above.

Consultee	Consultee Comments	Response
Iceni Projects on behalf of Diocese of London Land opposite the Jolly Farmers and Land at Jesus Church	The nature conservation constraints shown in Figure 3.7 in relation to the client's sites appear to extend beyond their boundaries. This should be reviewed.	Noted.
HGH Consulting on behalf of Landvest Crews Hill Ltd Land at Parkview Nursery	The principle of a review of the Green Belt in Enfield is supported, in particular the area around Crews Hill, in view of the fact a lot of this land makes a limited contribution to the Green Belt. Consultee argues the client site does not comply with the five purposes of the Green Belt.	Noted. The contribution of all Green Belt land in Enfield to the purposes of the Green Belt will be objectively and independently assessed as part of this assessment.
Thames Water	Figure 3.6 identifies King George's Reservoir and William Girling Reservoir as Local Open Space which is incorrect.	Local Open Space is not being treated as an absolute constraint and so does not impact or influence our assessment of Green Belt harm. The Reservoir falls within a designated Local Open Space in the Enfield Local Plan Proposals Map.
	It is understood that this is an independent review to determine which land is most appropriate for Green Belt release to meet an unmet need for development, but this must be made clear.	<p>The overall purpose of the study is to undertake an independent, robust and transparent assessment of the Green Belt in the borough in line with national policy, guidance and case law. The study outputs will identify the areas of both designations likely to be least or most harmful to the purposes of Green Belt or criteria of MOL if released from the designation.</p> <p>Paragraph 1.6 of the method statement states: <i>'These outputs inform only part of a necessary exceptional circumstances case for making alterations to Green Belt and / or MOL boundaries. As such, the study does not recommend where Green Belt and MOL boundaries should be altered. To build a complete and robust exceptional circumstances case, consideration must also be given to the outputs of this study in combination with other important elements of the borough's Local Plan evidence base, including the borough's urban capacity study, the Local</i></p>

Appendix A  
 Method Statement Consultation Log  
 Green Belt and Metropolitan Open Land Study

Consultee	Consultee Comments	Response
		<i>Plan Sustainability Appraisal as well as the deliverability of preferred site options.'</i>
	Clarification needed as to whether Sites of Importance for Nature Conservation are an absolute constraint, as the method statement is conflicting.	Sites of Importance for Nature Conservation are not considered an absolute constraint.
	Land to the south of William Girling Reservoir should be assessed as part of the Green Belt review.  The consultee does not believe this land meets the five purposes of the Green Belt.	The land to the south of William Girling Reservoir will be assessed as part of the study.