London Borough of Enfield

London Borough of Enfield
Green Belt and MOL Study

Method Statement

Prepared by LUC
April 2020
## London Borough of Enfield Green Belt and MOL Study

**Method Statement**

| Project Number | 10870 |

### Method Statement Details

<table>
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<tr>
<th>Version</th>
<th>Status</th>
<th>Prepared</th>
<th>Checked</th>
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<tbody>
<tr>
<td>1.</td>
<td>Draft Method Statement</td>
<td>Alex Martin</td>
<td>Josh Allen</td>
<td>Philip Smith</td>
<td>13.03.2020</td>
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<td>2.</td>
<td>Final Method Statement</td>
<td>Alex Martin</td>
<td>Josh Allen</td>
<td>Philip Smith</td>
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</table>

1. Draft Method Statement
2. Final Method Statement

Prepared: Alex Martin, Josh Allen
Checked: Josh Allen
Approved: Philip Smith

Date: 13.03.2020, 03.04.2020
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Chapter 1
Introduction

1.1 LUC has been commissioned by the London Borough of Enfield to undertake an independent assessment of the Green Belt and MOL within the Borough. The study will form an important piece of evidence for the Borough’s new Local Plan and subsequent Local Plans.

1.2 This method statement outlines the methodology for assessing the Borough’s Green Belt, and MOL.

Study aim and scope

1.3 The overall purpose of the study is to undertake an independent, robust and transparent assessment Green Belt land and MOL within the Borough in line with national policy, guidance and case law.

1.4 Figure 1.1 illustrates the location of Enfield Borough in Greater London and its relationship with the Metropolitan Green Belt. The Borough’s Green Belt forms part of the wider metropolitan Green Belt around London and is contiguous with the Green Belt in the neighbouring local planning authorities of Barnet, Broxbourne, Epping Forest, Hertsmere, Waltham Forest, and Welwyn Hatfield.

1.5 The study will draw out strategic variations in the contribution of Green Belt land to the five Green Belt purposes, set out in the National Planning Policy Framework (NPPF)\(^1\), and the harm of release to the designation. With regard to MOL, it will assess land against the four criteria for designating new MOL, set out in the London Plan\(^2\), and the harm of release to the designation. By drawing out such variation, the study will identify areas of land which perform relatively poorly and relatively strongly in both Green Belt and MOL terms.

Use of study outputs

1.6 The study outputs will provide the Council with the necessary Green Belt and MOL evidence to consider if alterations to Green Belt and / or MOL boundaries should be made through the Local Plan-making process, and if so where

\(^{1}\) Department of Communities and Local Government, 2019, National Planning Policy Framework [online] available at: https://www.gov.uk/government/publications/national-planning-policy-framework-

the most appropriate locations are likely to be in Green Belt and MOL terms.

1.7 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.

Method Statement engagement

1.8 Local planning authorities have a duty to cooperate\(^3\) with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 20 of the NPPF sets out the strategic topics for which Local Plan strategic policies should be prepared, including population and economic growth and associated development and infrastructure and facilities, climate change and the conservation and enhancement of the natural, built and historic environment. All these topics either have a direct or indirect link to land designated as Green Belt and/or MOL. Consequently, this method statement has been prepared for consultation with the stakeholders with whom the Council has a duty to cooperate. This includes neighbouring local planning authorities, Greater London Authority (GLA), Environment Agency, Historic England and Natural England.

1.9 This will provide an opportunity for the Council’s duty to cooperate partners to review and comment on the proposed approach to the study, prior to its completion.

1.10 Consultation comments will be reviewed and summarised in a consultation log for discussion with the Council. The consultation log will be used to revise the methodology for the study where appropriate. A summary of the consultation log, including details of how the methodology has been revised, will be included (as appropriate) in an Appendix to the study’s final report.

Stakeholders are invited to comment on the methodology by providing written comments to localplan@enfield.gov.uk by the 21st April.

Report authors

1.11 This method statement has been prepared by LUC on behalf of Enfield Borough Council. LUC is completing several independent Green Belt and MOL studies at a range of scales across the country, and has completed similar studies behalf of over 40 English local planning authorities in the past five years. All of our studies that have been tested at Examination have been found sound.

Method Statement structure

1.12 The remainder of this method statement is structured as follows:

- Chapter 2 – Policy context.
- Chapter 3 – Environmental context.
- Chapter 4 – Green Belt assessment methodology.
- Chapter 5 – Metropolitan Open Land assessment methodology.
- Chapter 6 – Next steps.

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\(^3\) Section 110 of the Localism Act (2011)
Enfield Green Belt and MOL Harm Assessment

Enfield Council

Figure 1.1: Green Belt wider context

Local Authority boundary
Green Belt

Map scale 1:100,000 @ A3

Contains OS data © Crown Copyright and database right 2019

Source: LBE, OS
Chapter 2
Policy Context

Origins of the Metropolitan Green Belt

2.1 The Green Belt within Enfield forms part of the Metropolitan Green Belt. The Metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a ‘green girdle’. In 1935 the London County Council put forward a scheme “to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable”. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.

2.2 During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie’s Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

2.3 In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- checking growth of large built-up areas;
- preventing neighbouring settlements from merging; and
- preserving the special character of towns.

2.4 Emphasis on the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be amended in exceptional circumstances was established through Circular 14/84.

2.5 In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:
to safeguard the surrounding countryside from further encroachment; and

- to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

2.6 PPG2 was replaced through the publication of the NPPF in March 2012. The NPPF was revised and re-published in July 2018 and in February 2019, and this currently sets out national Green Belt policy. The position of the Government in relation to Green Belt policy, provided through the NPPF, is detailed earlier in this chapter.

2.7 The Greater London Development Plan, approved in 1976, defined the full extent of the London Metropolitan Green Belt, including within Enfield. It stated that “The Green Belt gives definition to the built-up area as a whole, limits urban sprawl and provides an area where open recreational activities can take place. At the same time it plays an important role in the retention of areas of attractive landscape on London’s fringes”.

2.8 As of March 2018, the Metropolitan Green Belt covers around 513,860 hectares across 68 local authorities distributed between the regions of London, East of England and the South East. It accounts for approximately 32% of the total 1,629,510 hectares of Green Belt land in England.

Origins of Metropolitan Open Land

2.9 MOL was introduced in the Greater London Development Plan (GLDP), adopted in 1976. Its origins, however, can be found in the Public Open Space designation in the 1944 Greater London Plan and the Initial Development Plans, although MOL also includes land in private ownership.

2.10 The GLDP did not define the purposes of MOL; rather it described it as open land in public and private ownership which provides attractive breaks in the built-up area and is of significance to London as a whole. It stated that it should be the role of planning authorities to conserve and protect it, indicating that ‘many areas are public and their future is safe; but others are at risk’. The Plan recognised that these areas are not appropriately situated for inclusion in the Green Belt because they form ‘islands embedded in the urban fabric or penetrating deeply into the urban area as green wedges.’ However, it is indicated that they should be ‘safeguarded for a continuous pattern of open land surrounding London, particularly between inner and outer London, there is a need for greater consistency between Boroughs and its designation. “Although MOL may vary in size and primary function across London, particularly between inner and outer London, there is a need for greater consistency between Boroughs and its designation. The designation of too small or more locally significant areas, for example, will devalue the strength of the designation as a whole. If the land does not serve a catchment area of strategic significance or draw visitors from several Boroughs it may be more appropriate to propose and justify other local designations”.

2.12 This general approach has been carried forward into the current London Plan (2016), which replaced RPG3. A new London Plan has been published for consultation by the GLA. Current and evolving MOL policy is detailed in the following section.

National planning policy and guidance

National Planning Policy Framework

2.13 Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)3. The NPPF states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

2.14 This is elaborated in NPPF paragraph 134, which states that Green Belts serve five purposes, as set out below.

<table>
<thead>
<tr>
<th>The purposes of Green Belt</th>
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<tr>
<td>1) To check the unrestricted sprawl of large built-up areas.</td>
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<td>2) To prevent neighbouring towns merging into one another.</td>
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3) To assist in safeguarding the countryside from encroachment.
4) To preserve the setting and special character of historic towns.
5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.15 The NPPF emphasises in paragraphs 135 and 136 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state that "once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period."

2.16 When defining Green Belt boundaries NPPF paragraph 139 states local planning authorities should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period;
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.17 The NPPF goes on to state "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (paragraph 141).

2.18 It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.

2.19 Paragraph 143 and 144 state that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... "Very special circumstances" will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

2.20 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 145 which sets out the following exceptions:

- "buildings for agriculture and forestry;"
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan; and
- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."

2.21 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These are:

- "mineral extraction;"
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction;
- material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and
development brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

2.22 Finally, paragraph 135 states Green Belts should only be established in exceptional circumstances… and in proposing new Green Belt, local planning authorities must:

- demonstrate why alternative policies would not be adequate;
- set out the major change in circumstances the make the designation necessary;
- communicate the consequences for sustainable development; and,
- highlight the consistency of the new designation with neighbouring plan areas and the other objectives of the NPPF (paragraph 135).

2.23 The new London Plan\(^6\) states that “MOL is afforded the same status and level of protection as Green Belt”. Consequently, the principles of this national Green Belt policy are equally relevant to London’s MOL designation.

Planning Practice Guidance

2.24 The NPPF’s Green Belt policies are supplemented by additional National Planning Practice Guidance (NPPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects\(^7\). Other circumstances which have the potential to affect judgements on the impact of development on openness include:

- the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness; and
- the degree of activity likely to be generated by development, such as traffic generation.

2.25 The guidance also elaborates on paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including:

- “new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.”

2.26 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

Planning Advisory Service Guidance

2.27 Neither the NPPF or NPPG provide guidance on how to undertake Green Belt studies. However, the Planning Advisory Service (PAS) published an advice note\(^8\) (2015) that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in Chapter 4 where relevant.

The London Plan

2.28 The role of the Green Belt is also reflected in the London Plan. Policy 7.16 Green Belt states: “The Mayor strongly supports the current extent of London’s Green Belt, its extension in appropriate circumstances and its protection from inappropriate development.

The strongest protection should be given to London’s Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.”

\(^7\) Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2015))
b) “appropriate circumstances and its protection from MOL, supporting its current extent, its extension in its quality and hence its positive benefits for Londoners”.

Positive management of the Green Belt is a key to improving health, biodiversity and improve overall quality of life. Such improvements are likely to help human accessibility. These improvements are likely to help human health, biodiversity and improve overall quality of life.

2.30 The adopted Green Belt Policy 7.16 is likely to be replaced by Policy G2 of the New London Plan in 2020. The new policy stated that:

a) “development proposals that would harm the Green Belt should be refused”, and

b) “The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.”

2.31 The inspectors examining the new London Plan considered these sections not to be consistent with national Green Belt policy by virtue of the fact that they omit reference to the ‘very special circumstances’ for permitting development in Green Belt and the ‘exceptional circumstances’ for designating new and making alterations to existing Green Belt boundaries. The inspectors’ report recommended appropriate changes to bring the policy in line with national Green Belt policy. Furthermore, the inspectors’ report regards a “strategic and comprehensive review of the Green Belt” as necessary as part of the next iteration of the London Plan. However, in December 2019 the Mayor rejected these recommendations and published his intention to adopted the new London Plan in early 2020. The Secretary of State subsequently instructed that Policy G2 be amended to read:

a) “development proposals that would harm the Green Belt should be refused except where very special circumstances exist” and

b) “Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan”

2.32 The Secretary of State’s changes bring the policy in line with national planning policy.

2.33 The adopted London Plan also affords strong protection to MOL, supporting its current extent, its extension in appropriate circumstances and its protection from development having an adverse impact on its openness, advising that inappropriate development be refused except in very special circumstances. The supporting text to this policy (Paragraph 7.55) states that: “Green Belt has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners”.

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The adopted London Plan also affords strong protection to MOL, supporting its current extent, its extension in appropriate circumstances and its protection from development having an adverse impact on its openness, advising that inappropriate development be refused except in very special circumstances. The supporting text to this policy (Paragraph 7.55) states that: “Green Belt has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners”.

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2.34 Policy 7.17 of the London Plan states that any alterations to the boundary of MOL should be undertaken by Boroughs through the formal plan-making process, in consultation with the Mayor and adjoining authorities. The supporting text to the London Plan MOL Policy 7.17 states:

- that appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL.
- the importance of Green Chains and the need to designate them as MOL to acknowledge their London-wide importance.
- that development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate.

2.36 The New London Plan has the following differences to the current adopted policy:

- Draft Policy G3 stated that “development proposals that would harm MOL should be refused” as opposed to the adopted Policy 7.17 which makes reference to the national ‘very special circumstances’, protecting the openness of MOL and contains supporting text which limits appropriate development to small scale structures to support outdoor open space. However, the Secretary of State subsequently instructed that Policy G3 should delete this text leaving “MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt”.

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The fourth criterion for MOL designation has been rewritten to replace the phrase ‘Green Chain or link’ with “strategic corridor, node or a link.” This change emphasises the strategic nature of designation and how isolated areas of MOL can form part of a strategic link.

- The supporting text to Draft Policy G3 stated that “MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, ensuring that the quantum of MOL is not reduced, and that the overall value of the land designated as MOL is improved.” The inspectors’ report recommended removing reference to the need to ensure that the quantum of MOL is not reduced on the grounds that this implies land swaps would be appropriate, which is considered to be inconsistent with national policy. Again, in December 2019 the Mayor rejected this recommendation. However, the Secretary of State subsequently instructed that Policy G3 be altered to remove the requirement that the quantum of MOL is not reduced and the overall value is improved, again, bringing the policy in line with national planning policy.

- The supporting text to Draft Policy G3 also states that proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged.

**Local Planning Policy**

**Enfield Core Strategy (2010)**

2.37 The Council adopted the Core Strategy in November 2010. The Core Strategy sets out the spatial planning framework for development of the Borough over the next 10 to 20 years. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure. It contains core policies for guiding patterns of development.

2.38 Core Policy 33 – Green Bet and Countryside states that:

“The Council will continue to protect and enhance Enfield’s green belt. The strategic green belt boundary is shown on the Proposals Map. Proposals for changes to the detailed boundary at the local level will be brought forward as part of the Development Management Document subject to criteria set out in Planning Policy Guidance 2 and reflecting more local priorities.

Middlesex University’s Trent Park campus and the Picketts Lock leisure complex are identified as Major Development Sites within the green belt, the boundaries of which are shown on the Proposals Map. Where existing uses become redundant, the Council will work with partners to prepare planning briefs or masterplans in order to guide appropriate future development that preserves and enhances the character of the green belt.

The Council acknowledges the need for utilities companies to be able to carry out their statutory functions. Where this requires development within the green belt boundary, the Council will consider applications as cases of potential exceptional circumstance.

The Council acknowledges that exceptional circumstances may be presented by the need for diversification of the farming industry and for continued business growth in the Crews Hill defined area (as shown on the Proposals Map). The Development Management Document will set out specific criteria for assessing proposals of this nature that fall within the green belt.

In order to support the GLA’s Green Arc initiative, the Council will promote positive uses for the use of the green belt whilst meeting its statutory purposes, as identified in the North London Sub-Regional Development Framework.

The Development Management Document and Enfield Design Guide Supplementary Planning Document will set out criteria for assessing proposals in Areas of Special Advertisement Control and Areas of Special Character as shown on the Proposals Map.”

2.39 Core Policy 33 makes reference to two Major Developed Sites in the Metropolitan Green Belt: the former Middlesex University Trent Park campus and the Picketts’ Lock Leisure Complex. These areas are subject to ongoing development pressures.

2.40 Core Policy 34 – Parks, Playing Fields and Other Open Spaces, states that the Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space in the Borough by protecting MOL and extending its designation to include green chains that meet MOL designation criteria.


2.41 The Council adopted the Development Management Document in November 2014. The Development Management Document contains detailed criteria and policies for assessing planning applications within the Borough, including relating to protection of the Green Belt (DMD82), development adjacent to the Green Belt (DMD83), major developed sites (DMD89) and the Crews Hill Defined Area (DMD90). These policies relate to the specific form of development, and so are not considered relevant to this strategic assessment of contribution to Green Belt purposes. They would however be relevant to any subsequent consideration of suitability of particular areas of land for development. Similarly, this study makes no reference to the
designated Areas of Special Character to which policy DMD84 relates; these are concerned with landscape quality, which is not a consideration in Green Belt assessment.

2.42 The existence of a defined area around Crews Hill, within which planning policy is designed to prevent residential development and to avoid further erosion of horticultural character, reflects the fact that this area is subject to ongoing development pressures.

2.43 Similarly the policy relating to MOL- Protection and Enhancement of Open Space (DMD71) relates to development on MOL, and how this will be refused except in very special circumstances.

Strategic Review of the Green Belt

2.44 As part of the evidence base for the Core Strategy the Council prepared a Strategic Review of the Green Belt in 2010. This resulted in updates and adjustments to address the creation of Enfield Island Village, a strategic development which occurred after the original Metropolitan Green Belt designation, and local Borough boundary changes that had come into effect after the adoption of Enfield’s 1994 Unitary Development Plan, but did not constitute a comprehensive review of the Metropolitan Green Belt land within Enfield.

Detailed Review of Green Belt Boundaries

2.45 A detailed review of Green Belt boundaries was carried out in 2013 in line with Core Strategy Paragraph 8.68 which stated that: "The Council will set out criteria and undertake a detailed review of green belt boundaries in accordance with PPG2 and the local character. This work will inform the Development Management DPD".

2.46 The review focused on the defensibility of boundaries in order to suggest minor changes and did not consider strategic changes or measure the contribution of land to Green Belt purposes.

Metropolitan Open Land and Green Chains Review

2.47 A review of the Borough’s MOL and Green Chains was carried out in 2013 to support the policies in the Development Management Document. The review identified and recommended proposed changes to the list of open spaces currently designated as MOL or Green Chains on the Core Strategy Policies Map.

2.48 Of the 45 spaces assessed, there were no changes to 14. The boundaries of 22 were amended due to past cartographic inconsistencies or subsequent development. One local open space was designated as MOL. The Council extended the MOL designation to include Green Chains that meet one of the MOL designation criteria set out in the London Plan. As a result nine green chains were re-designated as MOL.

Area Action Plans

2.49 Area Action Plans deliver location-specific policies to guide development in areas of the Borough in which strategic growth is envisaged. Two of the three areas subject to Area Action Plans include elements of Green Belt:

- The Lee Valley between the M25 in the north and Ponders End in the south is included within the study area of the North East Enfield Area Action Plan.
- The Pickett’s Lock complex and Green Belt land between the William Girling Reservoir and the A406 North Circular are included within the study area of the Proposed Submission Edmonton Leeside Area Action Plan.

2.50 The role of Green Belt, and relationship between Green Belt land and the urban edge, will be an important consideration in development proposals and master-planning for these areas.

New Enfield Local Plan (2018 – 2036)

2.51 The Council carried out an issues and options consultation in late 2018 and early 2019. The issues and options consultation document included a draft policy approach for Green Belt and MOL, this stated that ‘The Council will protect Green Belt and Metropolitan Open Land (MOL) for the purposes in accordance with the NPPF’. It will do this by:

- Resisting new development regarded as inappropriate development as set out in the NPPF; and
- Supporting development which improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation, where there is no conflict with protecting the openness of such land.

2.52 The draft policy approach also states that the Council ‘will undertake a Green Belt boundary review to assess if areas of the Borough’s existing Green Belt still meets the purposes as set out in paragraph 134 of the new NPPF, and whether exceptional circumstances exist to justify changes to Green Belt boundaries to ensure the Council can plan positively to promote sustainable patterns of development and the growth needs of the Borough’.

11 Detailed Green Belt Boundary Review, March 2013 (Enfield Council)
# Neighbouring Green Belt and MOL studies

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<th>Authority</th>
<th>Study</th>
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Broxbourne’s Green Belt was reviewed in 2008. Only the first three purposes were assessed, with Broxbourne not being considered to contain any land warranting assessment in terms of contribution to the setting of historic towns (purpose 4).  
No land between Cheshunt and the southern boundary of the district (with Enfield) was considered to make a weak contribution to Green Belt purposes, and recognition was given to the role of this area in separating the large urban area within Broxbourne from London.  
**Green Belt Topic Paper (June 2017) – Borough of Broxbourne, Planning Policy Team**  
Assessed available evidence including evidence of the emerging strategy underpinning the Local Plan to judge whether there are specific locations where exceptional circumstances could be demonstrated to release Green Belt land. The report concluded there are 14 sites making up 467 hectares where the Green Belt could be released.  
Broxbourne Borough is not a London Borough and therefore does not contain any MOL. |
The Epping Forest Green Belt was reviewed in two stages.  
Stage one was carried out by the Council in 2015. The purpose of this was to undertake a high level review of the Green Belt land in the District to identify the contribution of the Green Belt towards national Green Belt purposes.  
The study considered only the first four purposes. Generally land around Harlow was considered to make a strong contribution to purpose 1. Land that fell in the gaps between Buckhurst Hill and Chigwell, Loughton and Buckhurst hill, Loughton and Theydon Bois, Theydon Bois and Epping and Waltham Abbey and Theydon Bois made the strongest contribution to purpose 2, while the majority of the Green Belt in the District was considered to make a strong, or relatively strong contribution to purpose 3.  
Only three parcels were considered to make a relatively strong or strong contribution to purpose 4 and this was land east of Chipping Ongar, at Lee Valley Park and North West of Epping. Purpose 5 was not considered in the study.  
A large area, including land adjacent to all inset settlements regardless of the Stage 1 assessed contribution for the parcels in question, was included in the Stage 2 assessment of smaller parcels.  
Land considered to have sufficient environmental constraint to preclude development, including areas subject to flood risk (zone 2, 3a or 3b), designated
SSSIs or Local Nature Reserves, was excluded from the second stage of assessment. This covers all of the Lee Valley border area with Enfield.

Stage 2 assessment parcels were defined around Sewardstone and found to make a strong contribution to GB with regard to purpose 1 (the prevention of sprawl from large urban areas) and purpose 2 (the separation of towns), reflecting their location between Enfield, Chingford and Waltham Abbey.

The Sainsbury warehouse and adjacent housing estate to the south of Waltham Abbey, close to the Enfield boundary, were identified as potential anomalies within the Green Belt, where lack of openness suggests that consideration could be given to amending the Green Belt boundary to exclude this development.

Epping Forest District is not a London Borough and therefore does not contain any MOL.

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**Hertsmere Borough**

Hertsmere Borough Council’s Green Belt was reviewed as part of the preparation of the Borough’s new Local Plan using a two-staged approach. Stage 1 rated of ‘strategic area’ parcels against each Green Belt purpose (except purpose 5), followed by the identification of sub-areas for further analysis at Stage 2. The stage 2 assessment included consideration of the effects of the release of sub-areas of Green Belt on the wider Green Belt. The methodology states that the assessment parcels may include Green Belt in neighbouring local authority areas where appropriate. The study found 14 areas that are recommended for further consideration in isolation (RA’s), 7 areas are recommended for further consideration in combination (RC’s) and 3 areas are recommended for further consideration as strategic cluster (RS’s).

Hertsmere Borough is not a London Borough and therefore does not contain any MOL.

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**Borough of Welwyn Hatfield**

A Stage 1 Green Belt Assessment was undertaken in 2013 for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council by Sinclair Knight Merz (SKM). The purpose of this study was to review the existing Green Belt in the context of the NPPF (2012) and to consider the extent to which it contributes to the fundamental aim of retaining openness and the purposes of including land in the Green Belt. The Stage 1 work was followed by a Stage 2 study in Welwyn Hatfield Borough in 2014 prepared by Jacobs (formerly SKM). The Stage 2 study assessed a total of 67 Green Belt sites identified by the Welwyn Hatfield Borough Council Strategic Housing Land Availability Assessment (SHLAA), the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites and areas of the Green Belt recommended for further assessment in the Stage 1 study. In 2016 the Stage 2 study was supplemented with an addendum prepared by Welwyn Hatfield Borough Council. This comprised a Green Belt and a local purposes assessment of an additional 10 sites identified as suitable through the Housing and Employment Land Availability Assessment 2016. It was carried out by the Council using the methodology developed by Jacobs for the original Stage 2 Review.
## Authority

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<tr>
<td><strong>Welwyn Hatfield Borough Council</strong> submitted its draft Local Plan to the Secretary of State in May 2017 and its Examination is currently underway. At the end of the Stage 2 hearing session in October 2017, the Inspector identified a need for further work in order to expand the findings of the Council’s Green Belt review evidence. <strong>Green Belt Assessment Updates (2018/2019) - LUC</strong> LUC was subsequently commissioned to undertake the additional work as part of a Stage 3 study. Stage 3 of the study divided the Green Belt into appropriate parcels for assessment (at a finer grain of detail than the Stage 1 study) and appraise these against the nationally defined purposes of the Green Belt as set out in the NPPF, ensuring consistency (where possible) with the Stage 1 and Stage 2 Green Belt studies. Conclusions were then drawn on the potential degree of harm that may occur if areas of land were released from the Green Belt, taking into account the contribution of the land to the Green Belt purposes, the potential impact on the wider integrity of the Green Belt and the strength/continuity of revised Green Belt boundaries. The Stage 3 study concluded that most land within Welwyn Hatfield makes a significant contribution to one or more of the Green Belt purposes. The closest of the ‘most essential’ areas of Green Belt identified in the study to the London Borough of Enfield are the Green Belt gaps between Welham Green, Brookmans Park and Potters Bar. Welwyn Hatfield Borough is not a London Borough and therefore does not contain any MOL.</td>
</tr>
<tr>
<td><strong>Barnet Green Belt and Metropolitan Open Land Study Part 1 (2018) - LUC</strong> A joint Green Belt and MOL study was completed to inform the Borough’s next Local Plan. Consultation was carried in the summer of 2018 on a method statement for the assessment of the Borough’s Green Belt and MOL. The method statement contained draft criteria for the assessment of all Green Belt land against the five Green Belt purposes, followed by details for the assessment of harm to Green Belt and MOL generated by the release of specific parcels of land. The results found that there are several pockets of Green Belt adjacent to the existing urban edges which make a weak or relatively weak contribution to the Green Belt’s purpose. The results found there are two pockets of open land that are currently not designated as MOL or Green Belt are considered to have potential for designation as MOL or Green Belt which are Big Wood and Turner's Wood. There are two areas of open Green Belt which are isolated from the wider open countryside and are therefore not part of a continuous pattern of open land surrounding London, so they have the potential to be re-designated as MOL.</td>
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| **The London Borough of Haringey contains both Green Belt and MOL. However a review of the designations has not been undertaken in recent years. The Borough’s Strategic Policies DPD[1] and Development Management DPD protect Green Belt and MOL. Strategic Policy SP13 requires new development to protect and enhance Haringey’s parks and open spaces. All new development must “protect and****

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### Authority

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<tr>
<td><strong>London Borough Waltham Forest</strong></td>
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<td><strong>Green Belt and Metropolitan Open Land Review (2015) - LUC</strong></td>
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<tr>
<td>The Waltham Forest GB was assessed in 2015, as a single stage process. Only land within the Borough was assessed, and only a narrow strip of GB runs along the eastern side of the Lee Valley, other than adjacent to the southern end of LBE, where Banbury Reservoir forms a wider block. Parcels within the narrow strip were generally considered to make a moderate contribution to Green Belt purposes, with the Lee Valley within Enfield, with reservoirs along most of its length, considered to provide the primary contribution to preserving the settlement gap between Enfield and Chingford. Contribution was considered stronger between Banbury Reservoir and the southern end of the William Girling Reservoir, where the gap across the Lee Valley is narrower and the remnant countryside is less affected by infrastructure.</td>
</tr>
<tr>
<td><strong>Focused Green Belt and Metropolitan Open Land Assessment (2019) - LUC</strong></td>
</tr>
<tr>
<td>The previous study above suggested the most appropriate Green Belt and MOL that could be designated for development. However, other evidence sources found the Borough’s growth needs to be sustainably accommodated within the Borough’s built up areas. The report focuses on 3 locations with the Borough’s Green Belt and MOL that were identified by the Council as areas for development. The report assesses the ‘harm’ to the designations if all or part of the land is developed. The locations include: Green Belt land off Shadbolt Avenue and Harbet Road, MOL at the Lee Valley Ice Centre and MOL at Waterworks Visitor Centre.</td>
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2.53 Ratings for assessment parcels cannot be directly compared across boroughs due to differences in the way in which purposes are assessed, but all reviews that have been carried out, or are proposed, recognise that Green Belt land doesn’t need to rate well cumulatively to make a significant contribution, and that a relatively strong contribution to any one purpose can be sufficient to justify its role.
Chapter 3
Environmental Context

Green Belt

3.1 There are two main areas of Green Belt in Enfield: the majority lies in the north western part of the Borough between the edge of London’s built up area and the M25; the remainder lies at the eastern edge of the Borough within and directly adjacent to the Lee Valley Regional Park.

3.2 Beyond the Borough boundaries the Green Belt continues:

- West into Hertsmere District and the northern fringe of the London Borough of Barnet;
- North beyond the M25 into Welwyn Hatfield District and Broxbourne District;
- East from the Lee Valley into Epping Forest District and a narrow strip of the Lee Valley within the London Borough of Waltham Forest.

3.3 The Borough’s Green Belt context is illustrated in Figures 1.1 and 3.1.

Metropolitan Open Land

3.4 Many of the Borough’s larger open spaces are designated as MOL with 36 separate designated areas. These are illustrated in Figure 3.1. The MOL is spread reasonably evenly throughout the Borough’s urban area.

3.5 The Borough’s areas of MOL have a broad range of uses, most notably:

- Playing pitches, fields and sports grounds
- Schools and their playing fields
- Allotments
- Cemeteries
- Public gardens
- Parks
- Golf courses
- Open space

3.6 Several areas of MOL are wholly or in part designated as Sites of Local Importance for Nature Conservation and / or Sites of Borough Importance for Nature Conservation. A number of areas of MOL have green chains and wildlife
corridors cutting east west and north south through the Borough.

3.7 The largest areas of MOL include:

- Enfield Golf Course, Worlds End Lane Open Space, school playing fields and sports grounds, Cheyne Walk Open Space and Allotments and Grange Park Railway Corridor;
- Enfield Playing Fields, allotments, Enfield Town Football Club and Kingsmead Academy School;
- Enfield Town Park and Bush Hill Golf Club; and
- Groveland Park, pitch and putt, playing fields, boating Lake and the Priory Hospital.

3.8 It is noted that several schools and buildings associated with outdoor sports and recreation facilities sit within the Borough’s MOL.

Settlement Pattern and Character

3.9 Approximately 47.6% of the Borough is relatively open and undeveloped: 37.3% is Green Belt, 7.1% is MOL and 3.2% is other open space. This leaves 52.4% of the area as urban developed land.

3.10 The Borough’s character varies from dense urban and suburban residential and industrial areas to open areas rural character, reflecting its position between the built up area of London and rural Hertfordshire.\(^{12}\)

3.11 The topography of the Borough has influenced the settlement character, with the higher density development found on the flatter valley floors and lower density development on sloping and higher ground. In addition radial road and rail connections have played a role in influencing the location of development.

3.12 An emerging pattern of higher density development, including Victorian terraces, inter-war Garden City style housing and later freeform and street-based housing estates is found in the east of the Borough, structured around a string of linear centres along the Hertford Road and edged by a band of large scale industrial development along the Lee Valley. Conversely older suburban and urban housing is predominant in the central part of the Borough, with historic centres present, such as Enfield Town, Southgate Green and Winchmore Hill.

3.13 The western part of the Borough, the northern area of which is dominated by Green Belt, has more of a pattern of lower density, larger suburban housing. This includes a series of ‘Metroland centres’ providing the planned focus of surrounding communities.

3.14 There is no defined settlement hierarchy in the Borough due to the metropolitan nature of most settlements. However, drawing on map analysis and the Enfield Characterisation study the developed areas listed below are identified as having adjacent Green Belt land.

3.15 Settlement areas that are part of, or contiguous with the metropolitan urban area:

- Hadley Wood
- Cockfosters
- Oakwood
- World’s End
- Gordon Hill
- Crews Hill
- Forty Hill
- Enfield Wash
- Enfield Lock and Enfield Island Village
- Ponders End
- Edmonton

3.16 Settlements that are inset into the Green Belt:

- Crews Hill (part)

3.17 Settlements that are washed over by the Green Belt:

- Middlesex University – Trent Park (classified in the Development Management Document\(^ {13}\) as a major developed site in the Green Belt)
- Botany Bay
- Clay Hill
- Forty Hill
- Bulls Cross
- Picketts Lock (classified in the Development Management Document as a major developed site in the Green Belt)

Routes

3.18 The Borough contains the following notable transport corridors (as shown on Figure 3.2):


The Ridgeway (A1005), linking Enfield to Potters Bar, follows high ground between Salmon's Brook and Turkey Brook – providing strong views across both valleys.

A110 Enfield Road follows the ridge to the south of the Merrybrook Valley.

The A111 Cockfosters Road links Cockfosters to Hadley Wood and on to Potters Bar.

The M25 crosses landforms but forms a barrier feature between Enfield and Potters Bar.

The Hertford Loop railway line links Enfield to Crews Hill and on to Cuffley, following a ridge between Turkey Brook and Cuffley Brook.

Lee Valley: there is a strong north – south orientation of routes in the Lee Valley. On the valley’s western terrace the A10 is the principal route, running mostly through the urban area but cutting through the Green Belt at one point. Railways also run north-south through the urban area. The A1055 and Lee Valley Line railway line run close to the eastern edge of Enfield, commonly marking a distinction between residential areas and Riverside industrial and commercial development. The River Lee Navigation is a key landscape element within the Green Belt, and the River Lee (its course altered to accommodate the Valley’s larger reservoirs) marks the borough boundary.

Landform

3.19 Higher ground in the north west of the Borough, slopes down gradually to flatter ground at the Lee Valley floor along the eastern edge of the Borough. The high ground is incised by the watercourses – Salmon Brook, Turkey Brook, Cuffley Brook and smaller tributaries – which pass through the metropolitan area to feed into the River Lee.

3.20 The Lee Valley is characterised by a string of large reservoirs, with King George’s Reservoir and the William Girling Reservoir constituting the bulk of the Green Belt within the valley. The earthworks that contain the reservoirs are strong visual elements in the landscape, creating a barrier through the urban area.

3.21 The Borough has several historic parklands (as explained in more detail below), the well wooded character of which contributes to the separation of the metropolitan edge and the rural fringes. Trent Park and Whitewebbs park are the principal wooded areas but there is also strong tree cover at Forty Hall, to the south of Clay Hill, to the west of Bulls Cross on the sides of Salmon’s Brook Valley and to the south of Hadley Wood.

3.22 Strong tree cover to the north of the M25, between Potters Bar and Cheshunt, strengthens the separation between Crews Hill and the inset Hertfordshire villages of Cuffley and Goffs Oak.

Flood risk and climate change

3.23 The Borough of Enfield has more watercourses than any other London Borough. Due to the topography, however, flood risk is generally limited to the areas immediately around the watercourses.

3.24 However much of the Green Belt and MOL in the Lee Valley is prone to flooding. Flood Risk in the Borough is illustrated on Figure 3.3.

3.25 The Borough’s green spaces including countryside and open spaces, both of which play a major part in limiting the impacts of climate change, absorbing rainfall and air pollutants and combatting the heat island effect in London’s built up area. The population density and open space within the Borough is shown on Figure 3.4.

Historic environment

3.26 Enfield’s growth has focussed on a number of historic towns and villages. Several of these centres were formed along the London – Cambridge Road, including Edmonton and Ponders End. Enfield Town was established early on as an important market town and grew steadily from this base.

3.27 The River Lee was an important focus for trade and later industrial activity. Whilst much of the historic form established along the river has gone, remnants still remain.

3.28 The historic origins of land use are still evident today. The existing band of industrial use along the Lee Valley has grown significantly and has resulted in a strong north – south belt of employment uses along the eastern edge of the Borough. Similarly, the historic town centres have grown and have kept a mixture of retail, employment, community and residential uses. Between these towns centres is predominantly residential use.

3.29 The Supplementary Planning Document ‘Making Enfield: Heritage Strategy 2019-24’ was developed by the Borough

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to update existing guidance on heritage management and provide further information on the application of relevant policies within the Enfield Local Plan. The Strategy highlights the heritage significance of the Borough’s green spaces – from grand scale formal landscapes to parks and incidental green space. It states that while these areas are valuable their relative heritage value is not fully understood and there is the opportunity to undertake a Borough wide assessment of these assets. This work has yet to be undertaken.

3.30 The Strategy also highlights the role of the Green Belt in protecting the rural fringe of the Borough which include traces of former royal hunting grounds, field boundaries and substantial parkland from former rural estates.

3.31 Enfield has 22 conservation areas, ranging from small local areas to larger former parkland estates. The following Conservation Area designations sit within the Green Belt:

- Trent Park Conservation Area lies just inside the southern boundary of the Green Belt, contrasting sharply in character to the suburbs of Oakwood and Cockfosters. The open nature of the park and agricultural landforms an important part of the wider landscape of the Green Belt.17

- Clay Hill Conservation Area covers the sparse development at Clay Hill. The creation of the Green Belt curtailed further suburban development after WWII and ensured the preservation of Clay Hill as an essentially rural area.18

- Forty Hill Conservation Area lies just inside the eastern extent of the Green Belt at Forty Hall and Myddelton House.19

- Enfield Lock Conservation Area lies in the Green Belt, forming the Prince of Wales Open Space.20

- Ponders End Flour Mills Conservation Area is entirely in the ownership of Wrights Flour Mills, which is washed over by Green Belt.

3.32 In addition, Hadley Wood Conservation Area borders the open Green Belt to the north, west and east, although views of the open countryside are restricted only to the north west.21

3.33 The Conservation Area Appraisals make no reference to the importance of the Green Belt to the setting and special character of historic London (Green Belt Purpose 4) has not been established.

3.34 The following conservation areas include MOL:

- Enfield Town Conservation Area includes Enfield Town Park, Chase Green Gardens and Enfield Grammar School and Enfield County Upper School Playing Fields. The Town Park provides a green setting for the area. There are long view of the park from a number of points along adjoining roads and paths. Chase Green Gardens separates the town centre from development farther north.22

- Turkey Street Conservation Area includes the very southern end of the open space at Turkey Street Station and Turkey Brook.

3.35 The following conservation areas lie directly adjacent to open spaces designated as MOL:

- Grange Park Conservation Area lies adjacent to Bush Hill Golf Course and Cheyne Walk Open Space. The trees bordering these areas of MOL are important elements in the Conservation Area, forming dramatic backdrops to long views.23

- Highlands Conservation Area lies adjacent to Old Grammarians RFC (to the south of Enfield Golf Club and Worlds End Park); however, there is little visual linkage between the MOL and the Conservation Area.24

- Lakes Conservation Area lies adjacent to Broomfield Park and sportsground, the south of which faces across Broomfield Park, which was formed in the 18th century around Broomfield House. A number of roads in the Lakes estate slope down towards the park, although there are no significant views within the area.25

- Southgate Green Conservation Area lies adjacent to Broomfield Park. The sloping ground of Cannon Hill gives good views out over the Park to the south.26

- Winchmore Hill Conservation Area lies adjacent to the north eastern corner of Grovelands Park. However, the lack of any visual link between the village and park gives the impression that the conservation area is completely surrounded by housing.27

- Meadway Conservation Area lies adjacent to the southern edge of Grovelands Park. There are views towards the open land and trees of the park from Bourne

18 Clay Hill Conservation Area Character Appraisal (2015)
19 Forty Hill Conservation Area Appraisal (2015)
22 Enfield Town Conservation Area Appraisal (2015)
23 Grange Park Conservation Area Character Appraisal (2015)
24 Highlands Conservation Areas Character Appraisal (2015)
26 Southgate Green Conservation Area Character Appraisal (2015)
27 Winchmore Hill Conservation Area Character Appraisal (2016)
Avenue, Parkway and Greenway. The Park provides a major green setting for the whole conservation area.28

3.36 There are five Registered Parks and Gardens in the Borough, two of which are also designated as MOL:

- Broomfield House Registered Park and Garden (Grade II).
- Grovelands Park Registered Park and Garden (Grade II*).

3.37 There are a large number of listed buildings in the Borough, some of which fall in the Green Belt or MOL.

3.38 The largest Scheduled Monument is the site of Elsyng Palace, occupying the north-eastern part of the grounds of Forty Hall in the Green Belt.

3.39 Two Scheduled Monuments are located in MOL, a medieval moated site at Enfield Golf Club and some earthworks at Bush Hill Golf Course. The borough’s historic assets are illustrated on Figure 3.5.

Green infrastructure and open spaces

3.40 Enfield is one of the greenest boroughs in London, with a wealth of country and urban parks, farmland, woodland, grasslands and waterways. There is a total of 342 spaces over 0.4ha in size.

3.41 Throughout the developed areas of the Borough there is a good network of green spaces. This includes a mix of larger formal parks such as Grovelands Park and Enfield Town Park, and smaller local and pocket parks. The Borough is also home to a number of golf courses, allotments and cemeteries and otherGI assets.

3.42 The south, west and central areas of the Borough contain the greatest densities of green and open space. Larger district parks can be found in the south west, while the south east and north east contains smaller green spaces and pocket parks.

3.43 However, it is noted that access to Borough’s open countryside is somewhat limited as footpaths provide access to only certain areas and connection is limited due to rivers, reservoirs and industrial uses.

3.44 The Borough has 67 public park sites, which comprises pocket, local, linear open space, district, metropolitan and regional parks. These cover 35.2% of the open space in Enfield and are the most abundant form of open space provision29.

3.45 The main urban parks, which are all designated as MOL, are:

- Grovelands Park
- Oakwood Park
- Pymmes Park
- Amos Park
- Broomfield Park
- Albany Park
- Town Park
- Durants Park
- Jubilee Park

3.46 The Borough also has a couple of country parks; Trent Country Park and Whitewebbs Country Park.

3.47 The Borough’s Parks and Open Spaces Strategy identifies Haselbury, Upper Edmonton and Edmonton Green as the areas with the best provision of public parks in the Borough. Areas with a deficiency include the northern part of Cockfosters ward, large parts of the eastern Highlands and parts of central Grange.

3.48 Just over a quarter of the Borough’s open space (27%) is comprised of playing fields and sports pitches. The main areas containing pitches are:

- Pymmes Brook
- King George’s Field
- Enfield Playing Fields
- Tottenham Sports Ground
- Clowes Sports Ground

3.49 The largest areas of playing fields are located near the dense centres of Enfield and Edmonton, with smaller playing fields being distributed relatively evenly across the rest of the Borough. Areas where pitches are less accessible include the south of the Borough, near the north circular and in the south east of the Borough. There is also lower provision along the urban/rural fringe where population density is lower.

3.50 There is a high demand for allotments in the Borough. There are currently 42 sites, 40 of which are public. Most of the spaces are integrated with wider open spaces, although a number exist independently. The main allotment sites are:

- Fairbrook

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28 Meadway Conservation Area Character Appraisal (2015)
Southgate Chase
Barrowellfield
Wier Hall
Houndsfield

3.51 The greatest concentration of allotments is found in the southern part of the Borough in close proximity to the Great Cambridge Road. There are notably fewer allotments in the south east and south west of the Borough.

3.52 There are 14 cemetery sites in the Borough, half of which are public. These are distributed across the southern and northern areas of the Borough.

3.53 There are 17 sites of Natural or Semi-Natural greenspace which include nationally important habitats such as native woodland (including ancient woodland) and species rich grassland. The main spaces include Cheyne Walk; Clay Hill Fields; and Covert Way Fields.

3.54 The natural and semi natural spaces generally comprise small pockets of land within the urban area. Areas that are deficient in this type of open space include most of the west and central parts of the Borough.

3.55 Enfield has a large number of Sites of Importance for Nature Conservation, which includes Chingford Reservoirs, designated as a Site of Special Scientific Interest for populations of wildfowl and wetland birds.

3.56 There are a large number of golf courses in the Borough, mainly located in the northern area between the edge of the urban area and the wider countryside. A number of these courses including the Lee Valley, Trent Park, Whitewebbs, Hadley Wood and Crews Hill are in the Green Belt, while others, Bush Hill and Enfield, are designated MOL.

3.57 There are a number of Green Chains which run through the Borough linking the Borough’s and neighbouring Borough’s MOL and Green Belt land.

3.58 The Green Infrastructure and Open Environments: All London Green Grid Supplementary Planning Guidance highlights a number of strategic links and corridors in the Borough:

- Salmon Brook Link – starts in the Green Belt, running through farmland before passing through residential areas and golf courses. It then connects to Bury Lodge Park and onward through cemeteries and playing fields in Edmonton to the green spaces of the Lee Valley Park at Pickett’s Lock. In this last section the Brook is only visible in these pockets of green space.

- Turkey Brook Link – follows the London Loop from the Lee Valley Walk at the Prince of Wales Open Space via Albany Park and though built areas connecting to Forty Hall Country Park, Hillyfields Park and Whitewebbs Park in the Green Belt.

- The Enfield Link – follows the New River course through Bush Hill Park golf course and the Town Park, connecting with the town centre. The route follows the river as it loops around the town and playing fields. The Link then moves north through largely residential areas and connects with the Green Belt at Myddelton House and Gardens and Capel Manor College.

- The Whitewebbs Link – forms a route through the Green Belt from Hillyfields Park on the urban fringe through Whitewebbs Country Park and beyond.

- Pymmes Brook Link – runs near the edge of the Borough and follows a small tributary from Picketts Local on the River Lee out to Monken Hadley Common in the Green Belt. The Pymmes Brook Trail links with the London Loop in the north and the Lee Valley Walk in the south, passing through a number of parks.

3.59 The Borough policy map also highlights a number of ‘Green Chain Missing Links’ for example where the Enfield link loops around Enfield Town Park, and across the Weir at Forty Hill.

3.60 Green Infrastructure in the Borough as well as Nature Conservation Designations are shown on Figures 3.6 and 3.7.
Figure 3.1: Green Belt and Metropolitan Open Land

- London Borough of Enfield
- Local Authority boundary
- Green Belt
- Metropolitan Open Land
- Major developed sites in the Green Belt
Enfield Green Belt and MOL Harm Assessment
Enfield Council

Figure 3.4: Population density and open space

Map scale 1:50,000 @ A3

Population / Hectares
- 50 - 100
- 100 - 200
- 200 - 500
- > 500

London Borough of Enfield
Local Authority boundary
Green Belt
Metropolitan Open Land
Local open space

Enfield Green Belt and MOL Harm Assessment
Enfield Council

Figure 3.4: Population density and open space
Figure 3.5: Historic environment

- **London Borough of Enfield**
- **Local Authority boundary**
- **Green Belt**
- **Metropolitan Open Land**

**Listed building**

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- **Conservation area**
- **Scheduled monument**
- **Registered park and garden**

Map scale 1:50,000 @ A3


The Historic England GIS Data contained in this material was obtained on 13/03/2020. The most publicly available up to date Historic England GIS Data can be obtained from HistoricEngland.org.uk.
Figure 3.6: Green infrastructure
Chapter 4
Green Belt Assessment Methodology

4.1 This chapter sets out the methodology used to undertake an assessment of the variations in harm to the Green Belt purposes that would result from the release of Green Belt land in the Borough.

4.2 There is no defined approach set out in national planning policy and guidance as to how Green Belt studies should be undertaken. The approach that is being consulted upon in this method statement is based on LUC’s extensive experience of undertaking Green Belt studies for over 40 local authorities, several of which have been tested through Examination and found to be robust.

4.3 Chapter 2 provides the policy context for the study. This contextual information has informed the assessment criteria and the definitions of key terms used in the Green Belt assessment set out below.

4.4 The assessment methodology is based on the NPPF’s two essential characteristics to Green Belts – openness and permanence – and five Green Belt purposes:

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

4.5 In order to undertake an area-based assessment of Green Belt contribution to these essential characteristics and purposes it is necessary to establish which settlements represent the large built-up area, neighbouring towns and historic towns. Alongside more general definitions of the essential characteristics of Green Belt – openness and permanence – these key settlements terms are defined in the context of Enfield later in the chapter. The definitions draw on national and local planning policy and the associated and guidance set out in Chapter 2.

4.6 Ratings and supporting analysis will be provided to show the contribution land makes to each Green Belt purpose and the impact on the integrity of the neighbouring land as a result its release from the Green Belt. These two considerations are
combined to give overall harm ratings. Parcel and sub-parcels are defined to show the variations in harm. These will be provided in map form.

4.7 Throughout the methodology, green boxes are included to clarify the method undertaken or highlight evidence, such as policy, guidance and case law, which supports the method of approach.

**Extent of assessment area**

**General extent**

4.8 The focus of this study is to assess the harm to the Green Belt purposes of expanding existing settlements. To achieve this, all of the land adjacent to the urban area and inset rural settlement boundaries within the Borough will be assessed.

4.9 The following settlements inset from the Green Belt will be covered:

- All inset land contiguous with the Greater London conurbation, including Hadley Wood.
- Crews Hill.

**Assessment approach**

4.10 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.

4.11 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.

4.12 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. The assessment of sites is given further consideration in the ‘next steps’ section.

4.13 The assessment will assume that all land within the urban area and settlements inset from the Green Belt, unless constrained, is ‘developed’ and is therefore not ‘open’. This means it potentially has a containing impact on the adjacent Green Belt. Likewise, the assessment will assume that any land released from the Green Belt would, unless constrained, be ‘developed’ and would not retain any ‘openness’.

**Consideration of development sites**

The Inspector’s Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted the need for assessing a wider area than just promoted development sites. The Inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites, and did not examine all potentially suitable areas. – Examination Document Reference EX39.

**Exclusions**

4.14 Land covered by an ‘absolute’ constraint to development – i.e. areas within which development would not be permitted – will be excluded from the assessment process. Absolute constraints include the following:

- Special Areas of Conservation
- Special Protection Areas
- Ramsar sites
- Sites of Special Scientific Interest
- Ancient woodland
- Sites of Important Nature Conservation
- Scheduled Monuments
- Registered Parks and Gardens
- Common Land
- Flood Zone 3
- Cemeteries.

4.15 It has been agreed with the Council that Sites of Importance for Nature Conservation, listed buildings conservation areas and local green space will not be treated as absolute constraints.31

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31 Given the relevance of these constraints to the contribution of MOL to MOL Criterion 3 these designations will not be considered absolute constraints in the assessment of MOL. Further details are provided in the Chapter below.
4.16 Land within the Green Belt that is subject to the identified environmental constraints in the list above will not be assessed.

4.17 It is important to note that, although these constrained areas will not be assessed for harm, any function they may perform as areas of open land and/or as boundary features – which may well have a bearing on the assessment of harm that would be caused from the release of adjacent unconstrained Green Belt land – will be taken into consideration.

Exclusion of constrained land

The Inspector’s Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) noted that there is no need to assess land that is unlikely to ever be developed:

“There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined.” – Examination Document Reference EX39.

Harm assessment: steps

4.18 The assessment process that will be applied to the analysis of land adjacent to the edges of each inset settlement is split into 6 steps, as shown in Figure 4.1.

4.19 The assessment of contribution to Green Belt purposes (Step 3) is the product of the analysis of two distinct elements: consideration of the extent to which each of the Green Belt purposes is applicable in any given area (Step 1); and consideration of the more localised variations in contribution that result from variations in the relationship between inset settlements and the Green Belt (Step 2).

4.20 Step 4 rates the potential impact of the release of land (with the assumption that it will lose openness) on the adjacent Green Belt.

4.21 Step 5 combines the judgements from Steps 3 and 4 to arrive at conclusions regarding variations in harm, with parcel or sub-parcel areas being defined to reflect these variations.

4.22 Unless harm for a parcel has been assessed as high, Step 6 repeats the assessment process to consider harm beyond its outer edge. This results either in the definition of a further parcel – where an area in which harm would be less than high can be defined – or text provided to support the judgement that any expansion beyond the parcel edge would result in high harm.

4.23 Each step is explained in further detail below.

Step 1: Consider the relevance of each Green Belt purpose

4.24 The first step of the assessment process is to identify if the Green Belt land within the assessment areas surrounding each inset settlement has the potential to contribute to any of these purposes based on the location of the land.

4.25 As noted previously there is no nationally defined approach to how Green Belt studies should be undertaken. However, case law highlights the importance of assessment against the Green Belt purposes within Green Belt assessments.

4.26 There are five Green Belt purposes as defined in paragraph 134 of the NPPF:

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

Consideration of Green Belt purposes

The Inspector’s interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt’s designation. – Interim Report.

The Inspector’s Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear “how the assessment of ‘importance to Green Belt’ has been derived” from assessments against the individual purposes of the Green Belt and highlighted the importance of revisions to Green Belt boundaries to “take account of the need to promote sustainable patterns of development, as required by Paragraph 85 [2012 NPPF, paragraph 139 of the 2019 NPPF] [even if] such an exercise would be carried out through the SEA/SA process.” – Examination Letter Reference: CCC/SCDC/Insp/Prelim.

Does the land have the potential to play a role with regards to purpose 1: to check the unrestricted sprawl of large built up areas?

4.27 It is possible to argue that all land within the Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.

4.28 For the purpose of this study, it is necessary to define what constitutes a ‘large built-up area’ within and in close proximity to Enfield, and what is meant by the term ‘sprawl’.

Definition of sprawl

The PAS guidance emphasises in relation to Purpose 1 the variable nature of the term ‘sprawl’ and questions whether positively planned development constitutes ‘sprawl’. – PAS Planning on the Doorstep.

The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl, noting “a variety of urban forms have been covered by the term ‘urban sprawl’, ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development.” – RTPI Research Briefing No. 9.

Assessing relevance of Green Belt purpose 1

Green Belt land has potential to play a stronger role with regards to Purpose 1 if:

- Land is close to the large built-up area.

Green Belt land has less potential to play a role with regards to Purpose 1 if:

- Land is not close enough to the large built up area for land to be associated with it.

Does the land have the potential to play a role with regards to purpose 2: to prevent neighbouring towns merging into one another?

4.3 The concept of what constitutes a ‘town’ has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.
4.4 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'.

4.5 The concept of 'merging' is clearer but assessing the extent to which land between towns contributes to preventing this is less so. However, 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.

4.6 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.

4.7 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.

4.8 There will be no separate assessment of gaps between settlements that are not considered to be towns, although the role of smaller areas of urbanising development in reducing perceived rural separation between towns will be considered.

4.9 This includes Crews Hill, Clay Hill and Hadley Wood which are too small to be considered towns in their own right.

4.10 Although there is only a narrow physical connection in between Hadley Wood and the main metropolitan area, it is relatively small and can be perceived as a separate settlement with its own setting. This makes land to the south of Hadley Wood, notably Covert Way Nature Reserve, the wooded Monken Hadley Common and to a lesser extent the adjacent Hadley Wood Golf Course, important in preventing coalescence.

4.11 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.

4.12 All towns within the London Borough of Enfield form part the London conurbation; there are no towns within the Borough which have not already coalesced with the city. There are, however, distinct settlements within the neighbouring Boroughs of Hertsmere and Epping Forest which lie in close proximity to Enfield’s portion of the large built-up area of London. Hertsmere Borough Council’s adopted Core Strategy32 names Borehamwood, Potters Bar and Bushey as the three most significant settlements within the Borough’s settlements hierarchy. Hertsmere Borough’s Green Belt Assessment33 defined the following settlements in Hertsmere as being relevant to Purpose 2:

- Borehamwood
- Bushey / Bushey Village
- Elstree village
- North Bushey
- Potters Bar
- Radlett
- Shenley

4.13 Only Potters Bar is considered to be in close enough proximity to the Green Belt within the London Borough of Enfield to be considered as a town in this Green Belt assessment.

4.14 Epping Forest District’s Green Belt Assessment34 defined the following settlements in Epping Forest as being relevant to Purpose 2:

- Epping
- Waltham Abbey
- Loughton / Debden
- Chigwell
- Buckhurst Hill
- Chipping
- Ongar
- North Weald Bassett
- Theydon Bois

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33 Hertsmere Green Belt Assessment, Arup, 2017
34 Epping Forest District Green Belt Assessment: Stage 2, LUC, August 2016
Definition of towns

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.

4.16 If consultees are aware of sources of evidence which identify other settlements that should be considered ‘towns’ in Green Belt terms or other evidence that contradicts the initial findings summarised above, we would welcome appropriate references in consultation responses.

Physical and visual role of preventing merging

PAS guidance, which is commonly referenced in Green Belt studies, states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities. – PAS Planning on the Doorstep.

Assessing relevance of Green Belt Purpose 2

Green Belt land has the potential to play a very strong role with regards to Purpose 2 – i.e. gap is very fragile – if:
- Land lies in a very narrow gap between distinct towns;
- Green Belt land has the potential to play a stronger role with regards to Purpose 2 – i.e. gap is fragile – if:
  - Land lies in a narrow gap between distinct towns;
  - Land lies in a moderate gap between towns, but with no significant separation;
  - Land lies in a moderate gap between towns, but urbanising development between the two reduces perceived separation.
- Green Belt land has the potential to play some role with regards to Purpose 2 – i.e. gap is moderate – if:
  - Land lies in a moderate gap between towns, with some significant separation;
  - Land lies in a wide gap between towns, but urbanising development between the two reduces perceived separation;
- Green Belt land has less potential to play a role with regards to Purpose 2 – i.e. gap is robust – if:
  - Land lies in a wide gap between towns, with some significant separation;
- Green Belt land will not play a role with regards to Purpose 2 if:
  - Land does not lie between neighbouring towns.

Does the land have the potential to play a role with regards to purpose 3: to assist in safeguarding the countryside from encroachment?

4.17 This considers the extent to which land constitutes ‘countryside’ on the basis of its usage, as opposed to reflecting urban influence. It does not consider the impact of development which reduces openness (in Green Belt terms) or of development which has a containing influence, as these are addressed in the analysis at Step 2.

4.18 Land may through its usage have a stronger relationship with the adjacent urban area and, as a result, not be considered ‘countryside’ to the same degree as other open land.

4.19 Equally land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character. Also, contribution to Purpose 3 does not equate to extent of built development,
as development that is rural in form is not considered to detract from countryside character.

4.20 It is important not to stray into assessing landscape character, sensitivity or value; whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land will not be taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.

Widely applicable purpose

PAS guidance presumes that all Green Belt contributes to this purpose to some degree, but suggests that:

“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”

PAS guidance also highlights that the quality of the landscape of an area should not be a consideration when assessing the contribution of Green Belt to the fulfilment of Green Belt purposes, including Purpose 3. This could be a planning consideration in its own right when seeking a suitable location for development. – PAS Planning on the Doorstep

Assessing the relevance of Green Belt Purpose 3

Green Belt land has the potential to play a stronger role with regards to Purpose 3 if:

- Land use is not associated with the urban area.
- Green Belt land has potential to play some role with regards to Purpose 3 if:
  - it is characterised by a use which, although it may be ‘appropriate’ within the Green Belt (see Step 2), is more strongly associated with the urban area – e.g. school playing fields, recreation grounds.
- Green Belt land will not play a role with regards to Purpose 3 if:
  - it is entirely contained within the urban area, and too small to be considered to constitute countryside in its own right.

Guidance on Green Belt of historic towns

An extract from Hansard in 1988 clarifies which historic settlements in England were considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge. Durham has since been added to this list. – Examination Document Reference 1048107.

This is supported by the PAS guidance which states: that “This purpose is generally accepted as relating to very few settlements in practice.” – PAS Planning on the Doorstep

Does the land have the potential to play a role with regards to purpose 4: to preserve the setting and special character of historic towns?

4.21 This purpose makes specific reference to ‘historic towns’, not to individual historical assets or smaller settlements such as villages and hamlets. The London Borough of Enfield’s Characterisation Study notes that Enfield originated as a series of smaller settlements in the countryside that surrounded London, all of which grew and merged to become a polycentric suburb of Greater London. Collectively they contribute to London’s historic character but, having merged with and been inset within city’s metropolitan urban area, what remains of their relationship with the open countryside designated as Green Belt is no longer physical, and any visual connection has been significantly reduced.


4.22 In light of the conflicting advice presented by Historic England above, we would like to take the opportunity presented by this method statement consultation to ask Historic England for further clarification on the relevance of historic London to Green Belt Purpose 4.

4.23 Should Historic England determine that London is a ‘historic town’ in Green Belt terms, it will be necessary to draw on the Borough’s historic environment evidence base to determine where the Borough’s Green Belt contributes to the setting and special character of historic London.

4.24 The historic character and evolution of the historic development to the north of Enfield’s metropolitan urban area in the Green Belt has been influenced by the use of the countryside as a retreat from London for the upper and middle classes, first as the Enfield Chase hunting forest, followed by the formal historic estates of Trent Park, Forty Hall, Capel Manor and Whittewebbs, and in the villas that characterise Clay Hill, Forty Hill and Bulls Cross. The preservation of these designated areas as locations beyond the city edge could considered important to the setting and special character of historic London.

4.25 The connection between a historic town’s historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

4.26 Key questions include:

- What is the relationship of the land with the historic town?
- Does the landform part of the setting and/or special character of a historic town?

4.27 If London is determined to be a historic town in Green Belt terms, consideration of the setting of individual heritage assets – buildings, monuments, conservation areas, parks and gardens and landscapes – will extend only to their contribution to the character and legibility of historic London, i.e. their metropolitan importance.

4.28 To ensure that the London Borough Enfield takes full account of this purpose, it will be necessary to establish which historic assets are a) of metropolitan significance and b) have a physical and/or visual relationship with Enfield’s Green Belt land. Drawing on the review of the Borough’s historic environment evidence summarised in Chapter 3 above, only the Green Belt land within the Registered Parks and Gardens and the Conservation Areas of Trent Park, Clay Hill, Enfield Lock and Ponders End, as well as the Green Belt land to the north west of Hadley Wood are considered to have physical and/or visual relationship with Enfield’s Green Belt.37

4.29 If consultees are aware of sources of evidence which identify other historic assets as having a physical or visual connection with the Green Belt in the Borough or other evidence that contradicts the initial findings summarised above, we would welcome appropriate references in consultation responses.

4.30 Finally, there is limited evidence available to determine whether the historic assets identified above are or are not important to the setting and special character of historic London. If consultees are aware on any such evidence we would be grateful if this could be shared as part of consultation responses.

4.31 In the absence of such evidence, a precautionary approach will be applied to judgements associated with the contribution of Enfield’s Green Belt land to Purpose 4, i.e. all Green Belt land within Conservation Areas (excluding Registered Park and Garden land) will be recognised as making a strong contribution to Purpose 4. Enfield Green Belt land adjacent to all historic designations, and any other relevant historic assets identified through this consultation will be visited to determine the extent of views of the wider Green Belt noted to be of significance to their setting and special character and therefore, by extension, the setting and special character of historic London.

Does the land have the potential to play a role with regards to purpose 5: to assist in urban regeneration, by

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37 Registered Parks and Gardens are recognised as absolute constraints and will therefore be excluded from assessment in line with the good practice outlined above.
encouraging the recycling of derelict and other urban land?

4.32 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release of one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

**Equal contribution of Green Belt to purpose 5**

The PAS guidance states:

“...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose”

In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. – PAS Planning on the Doorstep.

The Inspector’s report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 “this purpose applies to most land” but that “it does not form a particularly useful means of evaluating sites” – File reference: PINS/W5780/429/10

However, the examination reports of some planning inspectors, e.g. Cheshire East Council’s Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.

4.33 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Ascent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a ‘Brownfield Land Register’ of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement. The London Borough of Enfield’s latest Brownfield Land Register has been used to calculate the area of brownfield land within the urbanised area of the Borough.

4.34 Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements than it is land around different isolated settlements each with their own brownfield land areas.

4.35 Given the nature of the settlement pattern within Enfield, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. In order that the study appropriately assesses Purpose 5 and affords it equal weighting with Purposes 1-4, an even level of contribution to Purpose 5 has been determined for all areas of Green Belt based on the average availability of brownfield land across the Borough.

4.36 Without a clear range of brownfield land proportions for each settlement across the study area, it is not possible to calculate a tailored set of percentage ranges from which to judge contribution to Purpose 5. There is also no guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or weaker, role in encouraging urban regeneration.

4.37 The London Borough of Enfield Brownfield Register contains a record of roughly 49.82ha of brownfield land within the Borough. Roughly 29.5ha of the registered brownfield land falls within the Green Belt, leaving roughly 20.32ha within the urbanised area of the Borough. Therefore, the Borough’s Green Belt has and continues to play a significant role in encouraging the recycling of derelict and other urban land in the urban area before brownfield land in the Green Belt. Consequently, all Green Belt land within the Borough is considered to make a Strong contribution to Purpose 5.

4.38 If consultees are aware of other sources of evidence that support or contradict the above we would welcome appropriate references in consultation responses.

**Step 2: Identify variations in relationship between Green Belt land and development**

4.39 Having considered in general terms the variations in the relevance of each of the Green Belt purposes around an inset
settlement, the next step in the assessment process is to identify more localised variations in the relationship between Green Belt land and development with an urbanising influence. Land that is related more strongly to urbanising development typically makes a weaker contribution to all of the Green Belt purposes, being less likely to be perceived as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2) or encroachment (Purpose 3).

4.43 ‘Urbanising development’ is defined 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.

Appropriate Development

Appropriate development within the Green Belt cannot, according to case law\(^1\), be considered to have an urbanising influence and therefore harm Green Belt purposes. For the purposes of this study therefore, development deemed to be ‘appropriate’ within the Green Belt (as defined in the closed lists within paragraphs 145 and 146 of the NPPF) is not considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Caution is therefore exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut. For example, buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve the openness, or conflict with Green Belt purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view is taken on the extent to which the proposed land use has affected Green Belt purposes, for example by affecting openness, or encroaching on the perception of countryside i.e. the sense of distinction between the urban area and countryside. This is of relevance to the assessment approach for all of the Green Belt purposes.

The NPPF’s Green Belt policies are supplemented by additional planning practice guidance that sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.\(^2\)

4.4 Urbanising development could be located within the inset settlement or washed over by the Green Belt. In some cases, land on the fringe of an inset settlement is not currently developed, but unless the development of such land is constrained by other factors or designations (see paragraph 4.14) the assumption is made that it will be developed, and that it therefore cannot be considered ‘open’.

4.42 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 (Step 2). These factors are discussed in the paragraphs below.

Finer grain of study

The Inspector’s Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance, and that “a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt”. – Examination Document Reference EX38.

Openness: to what extent is the land free from ‘urbanising development’?

4.43 The NPPF identifies openness as an ‘essential characteristic’ of the Green Belt, rather than a function or

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\(^1\) This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

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.

4.44 Green Belt openness relates to lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms. Visual openness is however still relevant when considering the degree of distinction between an urban area and the wider countryside.

4.45 The assessment of openness will first consider the appropriateness of development. Where development is not ‘appropriate’, it will consider the extent, scale, form and density of development, in order to make a judgement on the degree of openness.

4.46 At a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development will have negligible impact in this respect, and will not therefore be defined and assessed as separate parcels of land.

Absence of urban influence and visual impact

As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017), openness is not concerned about the character of the landscape, but instead relates to the “absence of built development and other dominant urban influences”. – Examination Document Reference EX38.

Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:

“Openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.

The question of visual impact is implicitly part of the concept of ‘openness of the Green Belt’ as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking ‘the unrestricted sprawl of large built-up areas’ and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and ‘safeguarding the countryside from encroachment’

Openness

The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included, at paragraph 20, reference to openness in relation to appropriate development:

“Implicit in the policy in paragraph 89 of the NPPF is a recognition that agriculture and forestry can only be carried on, and buildings for those activities will have to be constructed, in the countryside, including countryside in the Green Belt. Of course, as a matter of fact, the construction of such buildings in the Green Belt will reduce the amount of Green Belt land without built development upon it. But under NPPF policy, the physical presence of such buildings in the Green Belt is not, in itself, regarded as harmful to the openness of the Green Belt or to the purposes of including land in the Green Belt. This is not a matter of planning judgment. It is simply a matter of policy. Where the development proposed is an agricultural building, neither its status as appropriate development nor the deemed absence of harm to the openness of the Green Belt and to the purposes of including land in the Green Belt depends on the judgement of the decision-maker. Both are inherent in the policy.” – Neutral Citation Number: [2016] EWCA Civ 404

Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although paragraph 90 of the 2012 NPPF states that “mineral extraction” is not “inappropriate development” in the Green Belt, it was found that the Council failed to take into account visual impacts when considering whether the proposal would “preserve the openness of the Green Belt” as required in paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council’s own assessment of the likely effects of the development on the landscape, visual impact on openness was “quite obviously” relevant to its effect on the openness of the Green Belt. This judgement was subsequently overturned in the Supreme Court (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3.
Contrary to Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), visual impact was found not to be an obligatory consideration when assessing Green Belt. It was found that “a proper reading of the NPPF in its proper historic context, visual quality of landscape is not in itself an essential part of openness for which the Green Belt is protected.” “The concept of “openness” in paragraph 90 of the NPPF is a broad policy concept which is the counterpart of urban sprawl and is linked to the purposes to be served by the Green Belt. Openness is not necessarily a statement about the visual qualities of the land, nor does it imply freedom from all forms of development.”

Permanence
The National Planning Policy Framework paragraph 113 defines both Green Belt ‘openness’ and their ‘permanence’ as the essential characteristics of Green Belts. The permanence of boundaries in terms of their durability through the lifespan of Local Plan is important as a planning concept but, when reviewing Green Belt boundaries, does not inform the assessment process.

Examples of land which lacks urbanising influences, and is therefore considered to be open in Green Belt terms:
- Any land without built form;
- Agricultural/horticultural/forestry buildings (e.g. farms, glasshouses);
- Mineral extraction or engineering operations that preserve Green Belt openness and do not conflict with the purposes of including land within it; and
- Low density or small-scale rural settlement.

Examples of urbanising development which could potentially reduce Green Belt openness:
- Buildings other than those for agriculture/horticulture/forestry;
- Solar farms;
- Car parks.

Distinction: to what extent do the physical features and characteristics of the Green Belt create distinction between inset land and the Green Belt?

4.47 The process of assessing distinction will be carried out along each inset urban area. It will also be applied to any washed-over settlements that are considered, through the

Step 2 analysis, to comprise development that diminishes Green Belt openness.

4.48 The analysis will be applied as a progression out from the inset edge, recognising that with distance from these edges the level of distinction will only increase, not diminish. The analysis will therefore only be carried out to up to a line beyond which distinction from the urban area is judged to be strong (unless distinction does not reach this level before another inset settlement, or the outer Green Belt edge, is reached).

4.49 The distinction between land within the Green Belt and developed land will consider five interrelated elements, which are considered in the following paragraphs. These are:

- Boundary features;
- Landform and land cover;
- Views;
- Distance; and
- Urbanising influence.

4.50 Consideration of these elements will be combined, using professional judgement, to give a rating on a 3-point scale (weak, moderate, strong distinction). Supporting text will indicate the relevance of each of the 5 elements and will note any particular weighting applied.

How do boundary features create distinction?

4.51 Consideration will be first be given to the nature of any physical boundary features. Table 4.1 below provides an indication of the strength attributed to different types of boundary. Stronger boundary features will be considered to have more permanence.

4.52 The initial analysis of land adjacent to an urban area will consider only the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features will increase distinction.

Table 4.1: Strength of boundary features.

<table>
<thead>
<tr>
<th>Strong boundary</th>
<th>Moderate boundary</th>
<th>Weak boundary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical feature significantly restricts access and forms consistent edge</td>
<td>Clear physical feature and relatively consistent edge, but already breached or easily crossed</td>
<td>No significant physical definition – edge may be blurred</td>
</tr>
</tbody>
</table>

For example: Motorway or dual-carriageway; railway; river/floodplain; sharp change in landform.

For example: Linear tree cover; mature, well-treed hedgerow.

For example: Regular garden/building boundaries or hedgerows.
Does landform and/or land cover increase distinction?

4.53 Landform and land cover may serve as boundary features, as indicated in Table 4.1, but this may extend into a broader feature which creates greater distinction, for example a woodland, lake or valley.

Does visual openness increase distinction?

4.54 This is not concerned with the scenic quality of views, but the extent to which an absence of visual association with urban areas may increase association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.

4.55 Caution will be used when considering views, recognising that seasonal variations and boundary maintenance regimes can have a significant impact.

4.56 As noted previously, the absence of visual openness does not diminish openness in Green Belt terms; however, it is accepted that there is a visual dimension to the perception of openness that can have a bearing on the distinction between urban areas and countryside.

Does distance from the urban edge add to distinction?

4.57 Even in the absence of significant boundary features, distinction from an urban area will increase with distance, so this will be factored into the judgement. Conversely, if boundary features are close together their combined impact will be diminished by lack of distance to separate them.

Does urban development have a containing influence?

4.58 With reference to the variations in openness noted above, we will consider whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. Where there is significant containment, development might be considered to constitute ‘infill’ rather than expansion of the urban area.

Infill development

Paragraph 145 of the NPPF notes that ‘limited infilling’ is not inappropriate within the Green Belt. – Paragraph 145.

PAS guidance states that development that would effectively be ‘infill’, due to the land’s partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution. – PAS Planning on the Doorstep.

4.59 Urbanising development could be located within the inset settlement or washed over by the Green Belt. In some cases, land on the fringe of an inset settlement will not currently be developed, but unless the development of such land is constrained by other factors or designations (see paragraph 4.6) the assumption will be made that it will be developed, and that it therefore cannot be considered ‘open’.

Step 3: Assess the contribution to the Green Belt purposes

4.60 Step 3 combines Step 1 (the identification of the potential for Green Belt land to contribute to the Green Belt purposes) and Step 2 (the assessment of relationship of the Green Belt with development) to assess the contribution of Green Belt land to Green Belt purposes 1, 2 and 3.

4.61 Standard text will be used to indicate that contribution to Purpose 5 is consistent across all of the study area.

4.62 Adjacent to settlements where Purpose 1 is applicable, the assumption will be made that the purpose will remain relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, will diminish.

4.63 In between settlements where Purpose 2 is relevant, contribution will likewise reduce at the periphery of the gap.

4.64 Unlike Purposes 1 and 2, contribution to Purpose 3 will not diminish with distance from urban areas and will consequently be high for all land beyond those areas that do not have strong distinction from an urban area.

What contribution does land make to Purposes 1 - 3?

4.65 Criteria for each of the five rating levels for purposes 1 - 3 are set out in Tables 4.2 – 4.4. These indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements. Supporting text will note where this is the case.

4.66 Rating the contribution of Green Belt land to Purpose 4 will be determined following consultation on this method statement. Contrary to Purposes 1 to 3, land which has a strong relationship with a historic town is likely to make a greater rather than lesser contribution to Purpose 4. Criteria for assessing the level of contribution to Purpose 4 will be defined following consultation on this method statement.
### Table 4.2 Criteria used to inform the assessment of contribution to purpose 1

<table>
<thead>
<tr>
<th>Purpose 1: Check the unrestricted sprawl of large built-up areas</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Significant</strong> contribution to purpose</td>
<td>Land is open and close to a large built-up area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively significant</strong> contribution to purpose</td>
<td>Land is open and close to a large built-up area. It has moderate distinction from the inset settlement edge; or Land is relatively open and close to a large built-up area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Moderate</strong> contribution to purpose</td>
<td>Land is open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is open and relatively close to a large built-up area, but intervening land provides a strong distinction; or Land is relatively open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is relatively developed and close to a large built-up area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively limited</strong> contribution to purpose</td>
<td>Land is open and close to a large built-up area. It has weak distinction from the inset settlement edge; or Land is relatively developed and close to a large built-up area. It has moderate distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Limited or No</strong> contribution to purpose</td>
<td>Land is relatively developed and close to a large built-up area. It has moderate distinction from the inset settlement edge; or Land is not open; or Land is not close to a large built-up area.</td>
</tr>
</tbody>
</table>

### Table 4.3 Criteria used to inform the assessment of contribution to purpose 2

<table>
<thead>
<tr>
<th>Purpose 2: Preventing neighbouring towns from merging</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Significant</strong> contribution to purpose</td>
<td>Land is open and lies in a very fragile gap between distinct towns. It has moderate distinction from the inset settlement edge; or Land is open and lies in a fragile gap between distinct towns. It has strong distinction from the inset settlement edge; or Land is relatively open and lies in a very fragile gap between towns. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively significant</strong> contribution to purpose</td>
<td>Land is open and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or Land is relatively open and lies in a very fragile gap between towns. It has moderate distinction from the inset settlement edge.</td>
</tr>
<tr>
<td></td>
<td>Land is open and lies in a fragile gap between distinct towns. It has moderate distinction from the inset settlement edge; or Land is open and lies in a moderate gap between towns. It has strong distinction from the inset settlement edge; or Land is relatively open and lies in a fragile gap between towns. It has strong distinction from the inset settlement edge; or</td>
</tr>
</tbody>
</table>
Purpose 2: Preventing neighbouring towns from merging

<table>
<thead>
<tr>
<th>Contribution to Purpose</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Moderate</strong></td>
<td>Land is open and lies in a fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or Land is relatively open and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or Land is open and lies in a moderate gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively open and lies in a fragile gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively developed and lies in a very fragile gap between towns. It has moderate distinction from the inset settlement edge; or Land is open and lies in a robust gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively open and lies in a moderate gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively developed and lies in a fragile gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively developed and lies in a fragile gap between towns. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively limited</strong></td>
<td>Land is open and lies in a robust gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively open and lies in a fragile gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively developed and lies in a very fragile gap between distinct towns. It has weak distinction from the inset settlement edge; or Land is open and lies in a robust gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively open and lies in a moderate gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively developed and lies in a fragile gap between towns. It has moderate distinction from the inset settlement edge; or Land is relatively developed and lies in a fragile gap between towns. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Limited or No</strong></td>
<td>Land is open and lies in a robust gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively open and lies in a moderate gap between towns. It has weak distinction from the inset settlement edge; or Land is relatively developed and lies in a fragile gap between towns. It has weak distinction from the inset settlement edge; or Land is not open; or Land does not lie between neighbouring towns.</td>
</tr>
</tbody>
</table>

Table 4.4 Criteria used to inform the assessment of contribution to Purpose 3

<table>
<thead>
<tr>
<th>Contribution to Purpose</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Significant</strong></td>
<td>Land is open and land use is not associated with the urban area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively significant</strong></td>
<td>Land is open and land use is not associated with the urban area. It has moderate distinction from the inset settlement edge; or</td>
</tr>
</tbody>
</table>
### Purpose 3: Assist in safeguarding the countryside from encroachment

<table>
<thead>
<tr>
<th>Contribution to Purpose</th>
<th>Land Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strong</strong></td>
<td>Land is open but land use is associated with the urban area. It has strong distinction from the inset settlement edge; or Land is relatively open and land use is not associated with the urban area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Moderate</strong></td>
<td>Land is open but land use is associated with the urban area. It has moderate distinction from the inset settlement edge; or Land is relatively open and land use is not associated with the urban area. It has moderate distinction from the inset settlement edge; or Land is relatively open but land use is associated with the urban area. It has strong distinction from the inset settlement edge; or Land is relatively developed but land use is not associated with the urban area. It has strong distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Relatively limited</strong></td>
<td>Land is open but land use is associated with the urban area. It has weak distinction from the inset settlement edge; or Land is relatively open and land use is not associated with the urban area. It has weak distinction from the inset settlement edge; or Land is relatively open but land use is associated with the urban area. It has moderate distinction from the inset settlement edge; or Land is relatively developed but land use is not associated with the urban area. It has moderate distinction from the inset settlement edge.</td>
</tr>
<tr>
<td><strong>Limited or No</strong></td>
<td>Land is relatively open but land use is associated with the urban area. It has weak distinction from the inset settlement edge; or Land is relatively developed but land use not is associated with the urban area, but it has weak distinction from the inset settlement edge; or Land is entirely contained within the urban area, and too small to be considered to constitute countryside in its own right; or Land is not open.</td>
</tr>
</tbody>
</table>

What contribution does land make to purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?

4.67 As noted under step 2, all Green Belt land is considered to make a strong contribution to Purpose 5.

### Step 4: Assess impact of release on adjacent Green Belt land

4.68 The nature of any boundary features are considered as part of the assessment of the potential impact of releasing land from the Green Belt on the Green Belt purposes. This determines the extent to which adjacent land incurs loss of integrity – i.e., a weakening of contribution to the Green Belt purposes – through a loss of distinction between development and open land.

4.69 If a revised Green Belt boundary results in a less distinct boundary between the settlement and the countryside, the release of the area of Green Belt under assessment is likely to weaken the land that remains designated as Green Belt.

However, even if a strong alternative boundary can be defined, there is potential for land that remains designated as Green Belt to be weaker, due to increased containment. However, in some locations it may be possible for a clearer Green Belt boundary to be defined – e.g., through use of a feature that marks a stronger, or more widely consistent, distinction between a built-up area and countryside.

4.70 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.

4.71 Considering the impact on distinction provides a rating for the impact that the release of Green Belt land has on the
integrity of adjacent Green Belt land, using a four-point scale of: significant / moderate / minor / no or negligible.

4.72 Guidelines for each of the four rating levels are set out in Table 4.5.

Table 4.5 Factors affecting the impact of release on adjacent Green Belt land

<table>
<thead>
<tr>
<th>Impact on adjacent Green Belt</th>
<th>Development has major impact on adjacent Green Belt as:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major impact</td>
<td>it significantly increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. And it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Moderate impact</th>
<th>Development has a moderate impact on adjacent Green Belt as:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>it significantly increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. Or it results in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). Or it moderately increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Minor impact</th>
<th>Development has a moderate impact on adjacent Green Belt as:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>it moderately increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. Or it results in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). Or it minimally increases the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and it results in a minimally weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>No/Negligible impact</th>
<th>Development has no or negligible impact on adjacent Green Belt as:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>it does not lead to the containment of any adjacent land; or</td>
</tr>
</tbody>
</table>
Impact on adjacent Green Belt

- It contains adjacent Green Belt land that plays a weaker role in relation to the Green Belt purposes than the land being released.

And

- It results in no significant change in strength of distinction between the inset settlement and the Green Belt (i.e. resulting in no significant change in strength of Green Belt boundary); or

- It results in a clearer or more consistent distinction between the inset settlement and the Green Belt (i.e. resulting in a clearer or more consistent Green Belt boundary).

Impact on distinction

PAS guidance notes the types of areas of land that might seem to make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, including:

- Land where development would be well contained by the landscape
- Land where a strong boundary could be created with a clear distinction between ‘town’ and ‘country’. – PAS Planning on the Doorstep.

Step 5: Define variations in harm to the Green Belt around the inset edge as parcels and sub-parcels.

4.73 The assessed contribution of land to the Green Belt purposes (Step 3) is combined with the assessed impact of its release on remaining land designated as Green Belt (Step 4) to determine an overall assessment of the harm of releasing land from the Green Belt. Variations in harm rating around an inset settlement are reflected in the definition of either a parcel or a sub-parcel.

4.74 Parcels are defined to reflect clear variations in identified harm of Green Belt release, as well as variations in the reasons for identified harm of Green Belt release. As such, adjoining areas of land which are assessed to cause the same amount of harm from release but for different reasons (such as land contributing to different purposes) are assessed as separate parcels.

4.75 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:

- There is a small variation in harm within the wider parcel;
- There is limited openness within part of a parcel due to the presence of development.

4.76 As previously noted, the study will assess all land surrounding inset settlements, extending out to the point beyond which development would result in a high level of harm. Where land directly adjacent to an inset settlement is assessed to be high harm, a parcel is defined and a written assessment provided; however no outer boundaries for the parcel will be shown because harm associated with expansion of a settlement will only increase with any release of land further from the settlement edge. The assessment of harm out from an inset edge is cumulative.

4.77 Green Belt harm is rated using a five-point scale ranging from high to low harm:

- High harm
- Moderate-high harm
- Moderate harm
- Low-moderate harm
- Low harm

4.78 Figure 4.2 provides an indication as to how loss of contribution to the Green Belt purposes (Step 3) and the impact on adjacent Green Belt (Step 4) influence the overall harm of Green Belt release. However professional judgement will be used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification will be provided in the final report for all ratings given in relation to how the overall judgement of Green Belt harm has been reached.
Figure 4.2 Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt

**Examples of overall judgements of Green Belt harm**

<table>
<thead>
<tr>
<th>Contribution to GB</th>
<th>Impact of Release on Adjacent GB</th>
<th>Harm Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Significant</td>
<td>Weak</td>
<td>High</td>
</tr>
<tr>
<td>Significant</td>
<td>Moderate</td>
<td>Low-Moderate</td>
</tr>
<tr>
<td>Moderate</td>
<td>Minor weakening</td>
<td>Moderate</td>
</tr>
<tr>
<td>Moderate</td>
<td>Minor weakening</td>
<td>Low</td>
</tr>
</tbody>
</table>

If land is considered to make a significant contribution to at least one GB purpose and its release is considered to cause at least a minor weakening of adjacent GB, then harm will be **high**.

If land is considered to make a relatively significant contribution to one GB purpose and its release is considered to cause a minor weakening of adjacent GB, then harm will be **moderate-high**.

If land is considered to make a moderate contribution to one GB purpose and its release is considered to cause a minor weakening of adjacent GB, then harm will be **moderate**.

If land is considered to make a relatively limited contribution to one GB purpose and its release is considered to cause a minor weakening of adjacent GB, then harm will be **low-moderate**.

If land is considered to make a weak contribution to all GB purposes and its release is considered to cause a minor weakening of adjacent GB, then harm will be **low**.

However, professional judgement will be used, and applying this:

A greater weakening of adjacent Green Belt will increase harm, whilst lack of weakening of adjacent Green Belt will reduce harm.

Contribution at the same rating level to more than one purpose may increase harm.

**Step 6: Consider the harm beyond the outer boundary**

4.79 Having defined parcels and sub-parcels to reflect variations in harm to Green Belt purposes around the perimeter of an inset settlement, assessment Steps 1-5 as set out above are in turn applied to the land beyond the outer boundaries of parcels assessed at less than high harm. This constitutes a cumulative assessment of the ‘inner’ parcel already assessed and the land beyond it.

4.80 If the harm resulting from expansion of release beyond a parcel’s outer boundary is assessed to be high, commentary is provided to explain why the parcel’s outer boundary marks this distinction.

4.81 If on the other hand it is possible to identify a new boundary beyond the settlement-edge parcel within which harm is rated as less than high, an additional parcel, with separate analysis and ratings for contribution and impact on adjacent Green Belt, will be defined to reflect this.

**Stage 2 Harm assessment outputs**

4.82 The parcel assessments will contain:

- an aerial view showing the parcel boundary and location;
- an OS map showing the parcel boundary and any absolute constraints;
- description of the parcel, including its boundaries and relationship with inset settlements and the wider Green Belt;
- rating and supporting text assessing loss of contribution to the Green Belt Purposes 1-5 resulting from release of the parcel;
- an analysis of the potential impact of release on the strength of adjacent Green Belt land and Green Belt boundaries;
- rating and supporting text assessing the overall harm to the Green Belt purposes of release of the parcel, considering loss of contribution to the Green Belt purposes and impact on the strength of adjacent Green Belt land;
- comment on potential for a more limited release of land within the parcel as a sub-parcel to limit harm to the Green Belt purposes;
- text explaining the harm resulting from release of land beyond the parcel’s outer boundary; and
- an OS map showing the parcel with colour-shaded variations showing the harm rating(s) and any areas of absolute constraint.
4.83 Any potentially cross-boundary issues, such as cases where release of land within Enfield would harm the integrity of Green Belt land outside of the Borough, will be addressed within the commentaries accompanying the individual parcel assessments.

**Green Belt and MOL boundary minor anomalies**

4.84 As part of this study consideration will be given to the accuracy and robustness of the Council’s existing Green Belt and MOL boundaries around each inset settlement with a view to recommending appropriate realignments along alternative permanent and readily recognisable physical features where necessary. In some locations it may be proposed that the boundary is re-aligned so that it is consistent with the settlement edge, or to address previous GIS digitising errors. Where the existing boundary cuts through the large residential gardens, but follows the urban edge and is robust and regular, it may not be appropriate to realign the boundary (as in some cases the Green Belt boundary may have been drawn in these locations to limit the potential for further development within residential gardens).
5.1 This chapter sets out the methodology to be used to assess variations in harm to MOL that would result from the release of designated land in the Borough.

5.2 The adopted London Plan policy 7.17\textsuperscript{41} states that national Green Belt policy applies equally to MOL. However, Policy G3 in the draft new London Plan\textsuperscript{42} states that MOL is afforded the same status and level of protection as Green Belt, specifically protection from inappropriate development in accordance with national planning policy. This revised policy wording can be interpreted to mean that national Green Belt policy applies only in so far as it relates to the significance of the designation, the appropriateness of development within it and the policy mechanisms for evidencing and justifying alterations to the designations boundaries (i.e. the need to set out exceptional circumstances). This policy change\textsuperscript{43} effectively acknowledges that the purposes of the designations, although similar, are different.

5.3 The essential characteristics of Green Belts – openness and permanence (defined in \textbf{Chapter 2}) – apply equally to MOL. Both characteristics apply to Criterion 1\textsuperscript{44} for designating new MOL in that the openness and permanence of designated land contribute to maintaining the physical structure of London by making it clearly distinguishable from the built-up area. Furthermore, the openness of MOL is inherently linked to its diverse range of functions as space for significant sport, leisure, recreation and cultural activities (Criterion 2), space for protected species and habitats, landscapes and historic environments (Criterion 3) and connected spaces that form part of a wider green infrastructure network (Criterion 4). Open land is designated as MOL to protect open spaces for leisure, recreation, sport, the arts and cultural activities (Criterion 2), protect features or landscapes of either national or metropolitan value (Criterion 3) and protect green chains, links, nodes or strategic corridors (Criterion 4).

5.4 The assessment of MOL therefore follows a similar structure to the Green Belt assessment albeit considering different criteria.

\textsuperscript{41} London Plan (2011) [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-londonplan/london-plan-chapter-seven-londons-living-space-19


\textsuperscript{43} Although the new Draft Local Plan has yet to be formally adopted, its advanced stage in the formal plan-making process make its contents a significant material consideration in the context of MOL planning.

\textsuperscript{44} London Plan Policy 7.17 sets out the four criteria required to designate open land as MOL (see Chapter 2).
Extent of Assessment Area

Assessment approach

5.5 There is no guidance on how MOL studies should be undertaken. However, an assessment focussing on the criteria for designating new MOL defined in adopted London Plan Policy 7.17 and the new London Plan policy G3 is considered appropriate.

5.6 Each discrete area of MOL will be assessed, with its contribution to each MOL criterion assessed in turn. Once the contribution to each MOL criterion has been described, consideration will be given as to whether any parts of the MOL area make less than a strong contribution to all four MOL criteria. These lower performing areas will then be mapped and assessed in more detail to determine the harm of their release from the MOL designation. MOL that makes a strong contribution to at least one of the MOL criteria will be mapped and assessed as resulting in high harm to the MOL designation if released.

5.7 MOL sites put forward in response to the Borough’s “Call for Sites” will be included in the assessment. Identified variations in harm will provide an indication of the likely harm of releasing site options in isolation. The assessment of sites is given further consideration in the ‘next steps’ section.

Exclusions

5.8 MOL criterion 3 requires consideration of the presence of features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value, i.e. the same designations considered absolute constraints and excluded from the Green Belt assessment directly contribute to the performance of MOL to the MOL criteria. Consequently, no designations and/or land uses will be excluded from MOL assessment.

5.9 If consultees are aware of any absolute constraints that do not have relevance to MOL criterion 3 and should therefore be excluded from the assessment of MOL we would welcome appropriate references in consultation responses.

5.10 While the Green Belt absolute constraints listed in Chapter 4 are not excluded from the assessment of contribution to the MOL criteria, consideration will be given to the same absolute constraints when considering the impact of release on adjacent MOL. For example, where areas of lower performing MOL are contained by absolute constraints the impact of release on adjacent MOL is likely to be lower by virtue of the fact that the constraint is highly likely to maintain openness of the land regardless of its designation as MOL.

Harm Assessment: Steps

5.11 There are three steps to the MOL harm assessment as shown in Figure 5.1.

Figure 5.1 MOL harm assessment steps

Step 1: Contribution of MOL Parcels to MOL Criteria

5.12 Step 3 combines the judgements from Steps 1 and 2 to arrive at conclusions regarding variations in harm, with sub-areas being defined to reflect these variations where possible.

Step 1: Contribution of MOL Parcels to MOL Criteria

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

- Criterion 1: It contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- Criterion 2: It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole or significant part of London.
• Criterion 3: It contains features or landscapes of either national or metropolitan value.45

• Criterion 4: It forms part of a Green Chain or link in the network of green infrastructure and meets one of the above criteria.46

Assessment of contribution to Criterion 1: contribution to the physical structure of London by being clearly distinguishable from the built up area

5.14 Where open, MOL is likely to be distinguishable from the urban area and therefore contribute to the physical structure of London. However, the study requires the definition of variations in the extent to which land meets this criterion. This requires an area-based assessment. MOL areas that contain built development that is inappropriate will typically make a weaker contribution to MOL criterion 1, being less distinguishable from the built up area.

5.15 The London Plan refers to the same national planning policy tests and definitions of inappropriate development as Green Belt. Therefore, development deemed to be ‘appropriate’ and ‘not inappropriate’ in the closed lists within paragraphs 145 and 146 of the NPPF will be used.

5.16 Openness relates to lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view (e.g. tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in MOL terms. The Green Belt case law and guidance relating to openness referenced in Chapter 4 above is considered equally relevant to the assessment of MOL.

5.17 Urbanising influences, such as inappropriate development within the MOL, can reduce distinction between the urban area and the MOL.

5.18 The same examples of Green Belt land uses listed as not affecting and affecting distinction in Chapter 4 are considered to apply equally to MOL. Although containment from the London’s built up area influences Green Belt land’s distinction from the urban edge, this is not relevant to an assessment of MOL’s contribution to criterion 1. This is because, by definition, all MOL is contained by the metropolitan urban area of London. How distinguished MOL is from the built up area is only relevant as it relates to the physical structure of London, whereas Green Belt distinction relates to the Green Belt purposes concerned with checking the outward unrestricted sprawl of London.

———
45 Note: new London Plan Policy G3 has made minor revisions to this criterion. The new criterion reads: ‘It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value’. This is not considered to change the assessment.

46 Note: new London Plan Policy G3 has made minor revisions to this criterion. The new criterion reads: ‘It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria’. This is not considered to change the assessment.
Assessment of contribution to Criterion 2: presence of open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities which serve either the whole of or a significant part of London

5.19 The relative size of the Borough’s MOL is considered to be the most appropriate proxy for assessing the relative significance of each area of MOL. The size guidelines for categorising the significance of London’s open spaces are set out in the supporting text to Policy 7.18 of the adopted London Plan and Policy G3 of the new London Plan. Regional Parks and Metropolitan Parks are described as follows:

- Regional Parks (400ha+) – Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.

- Metropolitan Parks (60-399ha) – Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.

5.20 All areas of MOL in excess of 60ha containing a range of facilities and features offering recreational, ecological, landscape, cultural and green infrastructure benefits will be considered to make a strong contribution to criterion 2 in the first instance. However, such areas will be reviewed to determine whether there are discrete pockets that could be released without compromising the size and range of facilities and features available. Such discrete areas will be considered to make a moderate contribution to criterion 2.

5.21 MOL areas that are less than 60ha will be considered to make a more limited to criterion 2, regardless of the range of facilities and features they contain. This is not to say that facilities and features in smaller areas of MOL are not important material considerations in planning terms, just that they are not considered to be important enough to merit the designation of open space as MOL under criterion 2 in isolation.

5.22 If consultees are aware of sources of evidence that can be used to consistently and robustly determine the catchment of all the facilities within the Borough’s open spaces we would welcome appropriate references in consultation responses.

Assessment of contribution to Criterion 3: presence of features or landscapes of national or metropolitan value

5.23 The following historic47, recreational48, ecological and landscape features of national and metropolitan value will be considered in the assessment of criterion 349:

- Listed buildings.
- Registered Parks and Gardens.
- Registered Battlefields.
- Scheduled Monuments.
- Conservation Areas.
- TFL Walk London Network Routes – Lea Valley Walk and the London Loop.50
- Metropolitan Sites of Importance for Nature Conservation (SINCs).
- European Natura 2000 Sites including Special Areas of Conservation, Special Protection Areas and Ramsar Sites.
- Sites of Special Scientific Interest.
- National Nature Reserves.
- Ancient Woodland.
- London Geological Sites.51

5.24 MOL overlapping with any one of these designations will be recognised as making a significant contribution to criterion 3.

5.25 MOL that does not overlap with the following ecological and recreational designations but is physically linked to MOL that does (i.e. is part of the same contiguous area of MOL) will be recognised as making a moderate contribution to criterion 3:


47 Archaeology Priority Areas have not been included due to the fact that they are designated and administered at the Borough level to mark areas where there is significant known archaeological interest and therefore significant potential for new discoveries.

48 Note: Regional and Metropolitan Parks are assessed under criterion 2 and therefore are not listed for assessment under criterion 3. This is considered appropriate given an open space only needs to make a contribution to one of the four MOL criteria for designating new MOL to be considered appropriate for designation.

49 World Heritage Sites and Strategic Views designated in the London Plan would have been considered in the Study, but none sit within or in the immediate vicinity of the Borough.


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- Metropolitan Sites of Importance for Nature Conservation (SINCs).
- European Natura 2000 Sites including Special Areas of Conservation, Special Protection Areas.
- Sites of Community Importance and Ramsar Sites.
- Sites of Special Scientific Interest.
- National Nature Reserves.
- Ancient Woodland.

5.26 This is in acknowledgment of the potential for the wider area of MOL to be used by the area’s users (listed species and/or members of the public) and/or the potential for the wider MOL to accommodate the future expansion of these designations.

5.27 Historic and landscape assets, however, must be considered an exception to this rule. The listings of historic assets within and directly adjacent to MOL will be reviewed to determine the contribution of the wider MOL to their setting and significance. In the absence of the wider MOL making a notable contribution to the setting and significance of a historic asset, strong contribution to MOL criterion 3 will be restricted to within a 25m buffer of the historic designation.

5.28 MOL that does not contain or lie adjacent to the designations listed above will be recognised as making no contribution to criterion 3.

5.29 If consultees are aware of other historic, recreational, ecological and landscape features of national and metropolitan value that should be considered in the assessment of contribution to criterion 3 we would welcome appropriate references in consultation responses.

Assessment of contribution to criterion 4: part of green infrastructure

5.30 The London Borough of Enfield contains several Green Chains/Links and Wildlife Corridors designated in the Local Plan and acknowledged in the Mayor of London’s ‘Supplementary Planning Guidance of Green Infrastructure and Open Environments: The All London Green Grid’52. Notable links include:

- The Pymmes Brook Link following a small tributary from Pickett’s Lock on the River Lee out to Monken Hadley Common in the Green Belt. The Pymmes Brook Trail links with the London LOOP in the north and the Lee Valley Walk in the south, passing through a number of parks, including Arnos Park and Pymmes Park.
- The Salmon Brook Link passing through Enfield Golf Course, Bush Hill and Bury Lodge Park to the Lee Valley Park at Pickett’s Lock.
- The New River and Enfield Link runs through Bush Hill Park golf course and the Town Park, connecting with the town centre. The route follows the river as it loops around the town and playing fields. The Link then moves north through largely residential areas and connects with the Green Belt at Myddelton House and Gardens and Capel Manor College.
- The Turkey Brook Link follows the London LOOP from the Lee Valley Walk at the Prince of Wales Open Space via Albany Park and through built areas connecting to Forty Hall Country Park, Hillyfields Park and Whitewebbs Park in the Green Belt to the west.

5.31 MOL making a contribution to criterion 1, 2 or 3 and directly connected with these strategic corridors will be recognised as making a contribution to criterion 453. The significance of the contribution will correspond to the highest level of contribution identified under criterion 1, 2 and 3. MOL that is not connected or aligned with these recognised strategic corridors will be recognised as making no contribution to criterion 4.

5.32 If consultees are aware of other Green Chains/Links and Wildlife Corridors that should be considered in the assessment of contribution to criterion 4 we would welcome appropriate references in consultation responses.

Step 2: Assess impact of release on adjacent MOL

5.33 Once the contribution of each area of MOL has been described, consideration will be given to whether there are any pockets within each MOL area that make less than a strong contribution to all four MOL criteria. These lower performing pockets will then be mapped and assessed to determine how their release would impact adjacent MOL.

5.34 The nature of any boundary features are considered as part of the assessment of the potential impact of releasing MOL on adjacent MOL. This determines the extent to which adjacent land incurs loss of integrity – i.e. a loss of distinction with the built up area.


53 Note: the London Plan states that in order for criterion 4 to apply open spaces must form part of a strategic network of green infrastructure and meet one of the other criteria.
5.35 If a revised MOL boundary results in a less distinct boundary between the built up area and the MOL, the release of the area of MOL under assessment is likely to weaken the land that remains designated as MOL. However, in some locations it may be possible for a clearer MOL boundary to be defined – e.g. through use of a feature that marks a stronger, or more widely consistent, distinction between a built-up area and MOL.

5.36 As described above, consideration will be given to the absolute constraints referenced in Chapter 4 when considering the impact of release on adjacent MOL. For example, where areas of lower performing MOL are contained by absolute constraints the impact of release on adjacent MOL is likely to be lower by virtue of the fact that the constraint is highly likely to maintain openness of the land regardless of its designation as MOL.

5.37 A four-point scale of: significant / moderate / minor / no or negligible will be used to assess impact on adjacent MOL.

5.38 Guidelines for each of the four rating levels are set out in Table 5.2.

Table 5.2 Factors affecting the impact of release on adjacent MOL

<table>
<thead>
<tr>
<th>Impact on adjacent MOL</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major impact</td>
<td>Results in significantly weaker distinction between the built up area and adjacent MOL (i.e. changing from a strong MOL boundary to a significantly weaker, or significantly more convoluted boundary).</td>
</tr>
<tr>
<td>Moderate impact</td>
<td>Results in no more than a moderately weaker distinction between the built up area and adjacent MOL (i.e. changing from a strong MOL boundary to a moderately weaker, or more convoluted boundary).</td>
</tr>
<tr>
<td>Minor impact</td>
<td>Results in no more than a marginally weaker distinction between the built up area and MOL (i.e. marginally affecting boundary strength or how convoluted it is).</td>
</tr>
<tr>
<td>No/Negligible impact</td>
<td>Results in no change in the distinction between the built up area and MOL.</td>
</tr>
</tbody>
</table>

Step 3: Define variations in harm to the MOL

5.39 As described above, where MOL makes a strong contribution to at least one of the MOL criteria, the harm of releasing the land from the designation will be recorded as high. However, where discrete areas of MOL contribute less than strongly to all MOL criteria, the assessment of harm on adjacent MOL (Step 2) will be considered alongside the assessed contribution (Step 1) to determine overall harm of releasing land from the MOL.

5.40 MOL harm will be rated using a five-point scale ranging from high to low harm:

- High harm
- Moderate-high harm
- Moderate harm
- Low-moderate harm
- Low harm

5.41 Figure 5.3 provides an indication as to how loss of contribution to the MOL criteria (Step 1) and the impact on adjacent MOL (Step 2) influence the overall harm of MOL release. However professional judgement will be used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification will be provided in the final report for all ratings given in relation to how the overall judgement of MOL harm has been reached.
**Figure 5.3 Guidelines for rating harm on the basis of contribution to MOL criteria and impact of release on adjacent MOL**

Examples of overall judgements of MOL harm

If land is considered to make a weak contribution to all MOL criteria and its release is considered to result in a negligible or no weakening of adjacent MOL, then harm will be low.

If land is considered to make a weak contribution to all MOL criteria and its release is considered to result in a minor weakening of adjacent MOL, then harm will be low-moderate.

If land is considered to make a weak contribution to all MOL criteria and its release is considered to result in a moderate weakening of adjacent MOL, then harm will be moderate.

If land is considered to make a weak contribution to all MOL criteria and its release is considered to result in a major weakening of adjacent MOL, then harm will be moderate-high.

If land is considered to make a moderate contribution to one MOL criterion and its release is considered to result in a negligible or no weakening of adjacent MOL, then harm will be low-moderate.

If land is considered to make a moderate contribution to one MOL criterion and its release is considered to result in a minor weakening of adjacent MOL, then harm will be moderate.

If land is considered to make a moderate contribution to one MOL criterion and its release is considered to result in a moderate weakening of adjacent MOL, then harm will be moderate-high.

If land is considered to make a moderate contribution to one MOL criterion and its release is considered to result in a major weakening of adjacent MOL, then harm will be high.

If land is considered to make a strong contribution to at least one MOL criterion then harm will be high.

If land is considered to make a moderate contribution to at least one MOL criterion and its release is considered to result in a major weakening of adjacent MOL, then harm will be high.

If land is considered to make a moderate contribution to one MOL criterion and its release is considered to result in a moderate weakening of adjacent MOL, then harm will be moderate-high.

If land is considered to make a weak contribution to all MOL criteria and its release is considered to result in a major weakening of adjacent MOL, then harm will be moderate-high.

Harm assessment outputs

5.42 The MOL harm assessments will follow a similar structure to the Green Belt harm outputs described in Chapter 4 above.
Chapter 6
Next Steps

Consultation

6.1 Following completion of the consultation period, all consultation responses received on the methodology will be reviewed and summarised in a consultation log for discussion with the Council. The consultation log will be used to revise the methodology for the study where appropriate. A summary of the consultation log, including details of how the methodology was refined will be included (as appropriate) as an Appendix in the final report.

Green Belt and MOL Assessment

6.2 Following the completion of the above, work on the assessment of harm will begin, following the steps outlined in the methodology in Chapters 3 and 4. Further details on the approach to the assessment are provided in these chapters.

6.3 The findings will then be presented alongside the finalised methodology in a final report. All judgements will be verified in the field prior to the publication of the final report.

Assessment of sites

6.4 Once the comprehensive harm assessment has been completed and used alongside other pieces of strategic evidence to identify preferred site options and reasonable alternatives within the designations, it will be necessary to assess the harm of releasing specific sites or combinations of sites to inform the selection of preferred site options and preparation of a robust exceptional circumstances case, if required.

Enhancement of Green Belt and MOL

6.5 Paragraph 138 of the NPPF states that local planning authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Furthermore, paragraph 141 of the NPPF states local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. These requirement are supported by additional
planning practice guidance which emphasises the need for Local Plans to include policies for compensatory improvements to the environmental quality and accessibility of the Green Belt. The PPG highlights the need for these improvements to be informed by appropriate evidence on issues such as green infrastructure, woodland planting, landscape, biodiversity, habitat connectivity and natural capital, access and recreation. Similarly, the supporting text to the New London Plan MOL Policy G3 states that proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged.

6.6 It is therefore important that the Borough considers where and how the Borough’s Green Belt and MOL can be enhanced, particularly the relationship between the Borough’s preferred sustainable pattern of development and the designations’ potential for new and improved appropriate uses.

6.7 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.