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# Waltham Forest Focussed Green Belt and Metropolitan Open Land Assessment

November 2019

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# 1 Introduction

- 1.1 LUC was commissioned to undertake a review of the London Borough of Waltham Forest's Green Belt and Metropolitan Open Land (MOL) in 2014. The study assessed the contribution of the Borough's Green Belt and MOL to the characteristics and purposes of the designations set out in the National Planning Policy Framework (2012) and the London Plan (2011). By drawing out variations in contribution the study provided insight into the Borough's Green Belt and MOL likely to be the most appropriate to accommodate development, if required. It was, however, subsequently established through the findings of other sources of Local Plan evidence that the Borough's growth needs could be sustainably accommodated within the Borough's built-up area outside the Green Belt and MOL<sup>1</sup>.
- 1.2 This report focuses on three locations within the Borough's Green Belt and MOL identified by the Council. It provides a more detailed assessment of the locations, drawing on the latest methods and guidance, including an assessment of the 'harm' to the designations should all or part of the land be developed.
- 1.3 The locations are:
  - Green Belt land off Shadbolt Avenue and Harbet Road, a small, enclosed site which is the subject of a current planning application.
  - MOL at the Lee Valley Ice Centre, which the Lea Valley Park Authority wishes to redevelop.
  - MOL at Waterworks Visitor Centre, which has also been considered by the Lea Valley Park Authority as a potential development site.
- 1.4 The locations are illustrated in **Figure 1.1**.
- 1.5 In addition, the assessment reviews the alignment of the Borough's existing Green Belt and MOL boundaries. Where the existing boundaries do not follow readily recognisable and permanent physical features, recommendations for minor boundary adjustments are made in line with paragraph 139 of the NPPF.

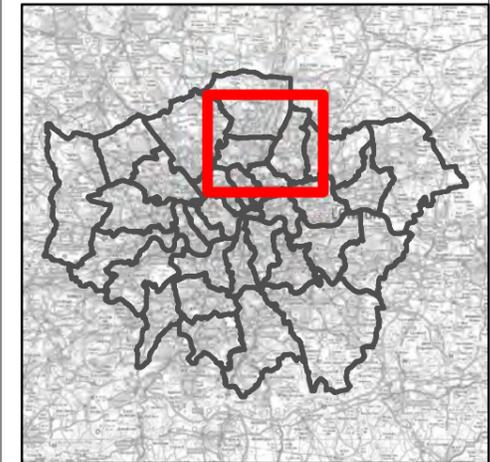
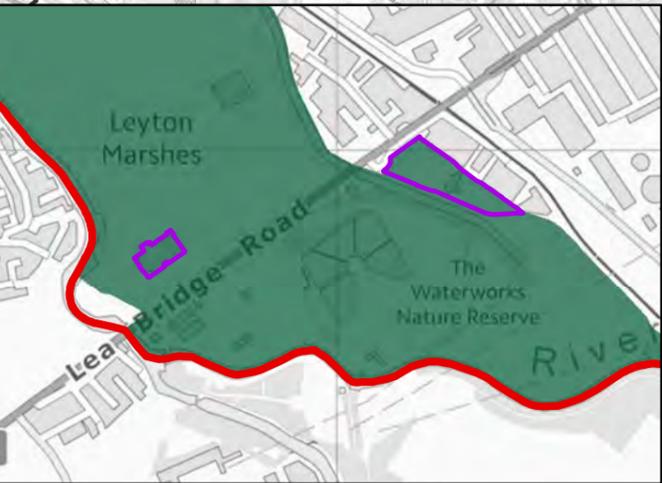
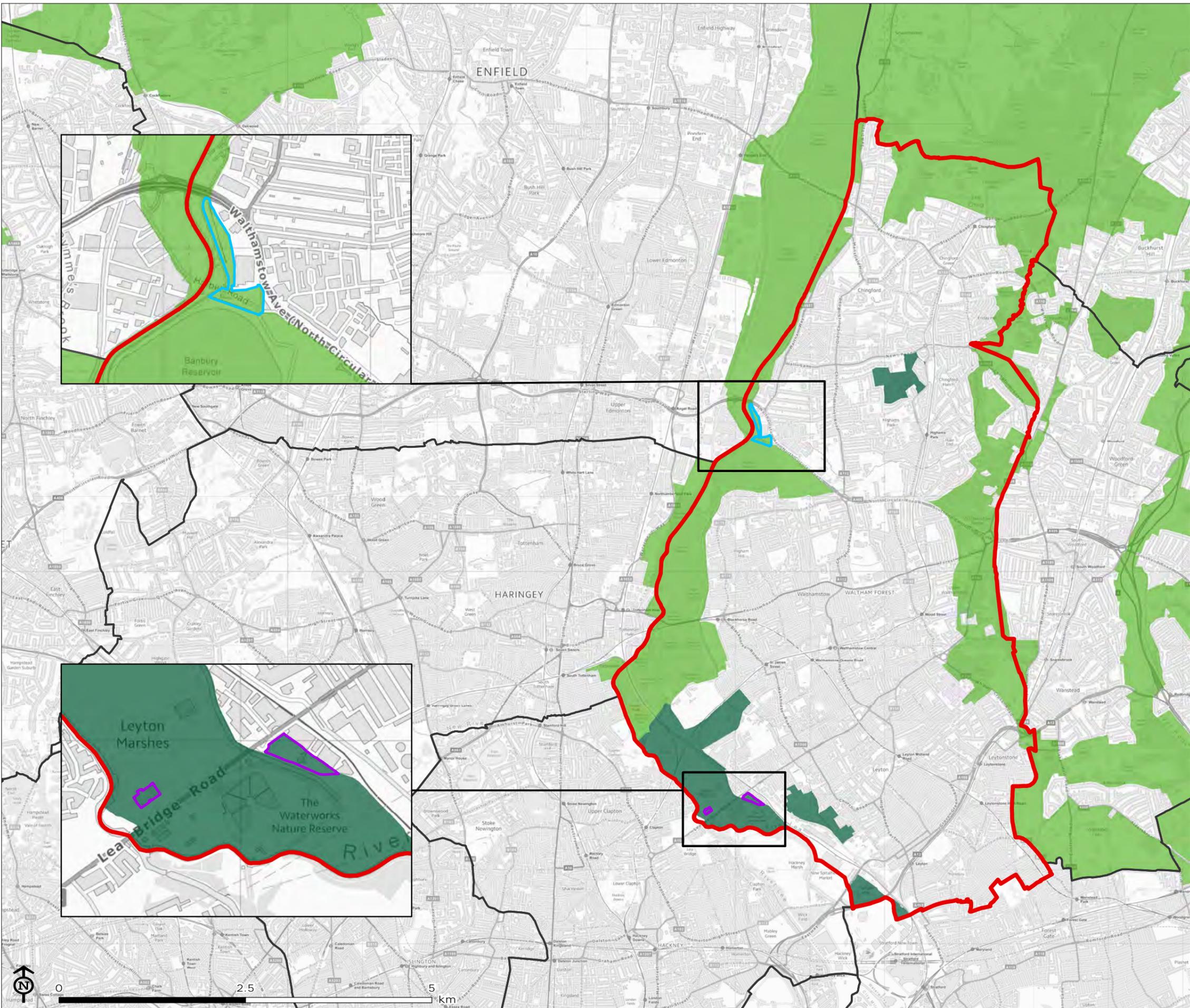
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<sup>1</sup> Details of the Borough's preferred plans for the location and management of growth within the Borough over the next Local Plan period (2020-2035) are set out in the Borough's Draft Local Plan (Policy 3) and supporting evidence – available at: <https://walthamforest.gov.uk/content/local-plan>

# Waltham Forest Green Belt and MOL Assessment

Figure 1.1: Study Area

- Study Boundary
- Local Authority boundary
- Metropolitan Open Land Site
- Green Belt Site
- Green Belt
- Metropolitan Open Land



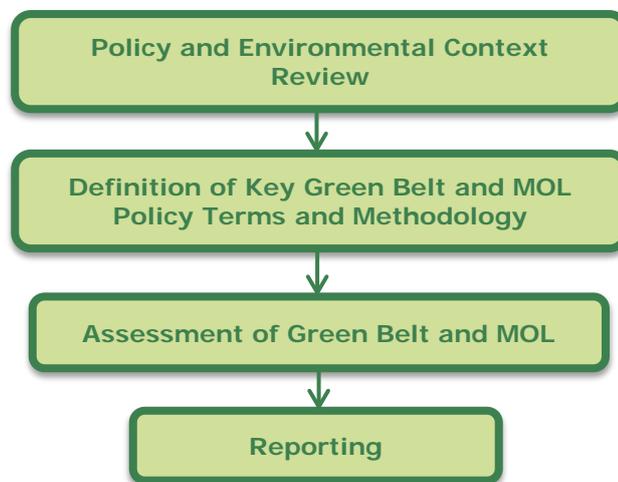
Map Scale @A3: 1:50,000



## Study overview

- 1.6 This focussed assessment of Green Belt and MOL harm draws on the most recent national planning policy and guidance (2019), regional MOL policy in the Draft London Plan (2018) and associated planning case law and Planning Inspectorate Local Plan Examination Reports. For example, the *Calverton Parish Council v Greater Nottingham Councils & others* (2015) case found that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the '*nature and extent of harm*' to the Green Belt and '*the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*' Further details on the policy and good practice guidance drawn on in developing the assessment criteria and key policy definitions for the focussed assessment are set out in **Appendices 1** and **2**.
- 1.7 **Figure 1.2** illustrates the key stages of the study methodology.

**Figure 1.2 – Study Overview**



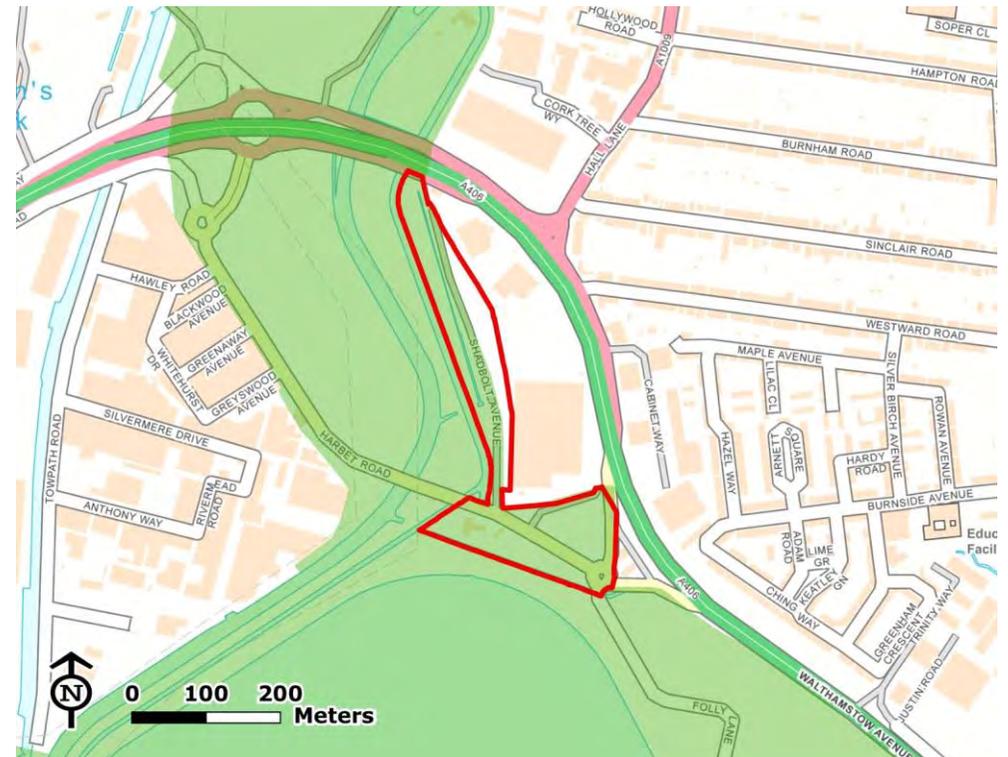
## Report structure

- 1.8 The remainder of this report is structured as follows:
- **Chapter 2** contains the detailed assessment of the three locations.
  - **Chapter 3** sets out some key considerations for 'next steps', including determining planning applications in the Green Belt and making alterations to Green Belt and MOL boundaries, general opportunities for mitigating harm to the designations and enhancing their beneficial uses.
- 1.9 The report is accompanied by the following appendices:
- **Appendix 1** sets out the assessment methodologies for both Green Belt and MOL.
  - **Appendix 2** sets out the national, regional and local policy context on designating and managing Green Belts and MOL. It also summarises guidance and case law related to Green Belts and MOL, and the approaches used in related studies in neighbouring local authorities.
  - **Appendix 3** illustrates the details of a list of potential minor Green Belt and MOL boundary adjustments.

## 2 Assessment Findings

- 2.1 This chapter sets out the detailed assessment findings for the three locations within the Borough's Green Belt and MOL:
- Green Belt land off Shadbolt Avenue and Harbet Road.
  - MOL at the Lee Valley Ice Centre.
  - MOL at Waterworks Visitor Centre.
- 2.2 In addition, **Figures 2.1** and **2.2** illustrate the location of the potential minor boundary adjustments to the Borough's existing Green Belt and MOL boundaries. Both figures are supported by more detailed maps and associated justification notes in **Appendix 3**.

# GB Area 1 - Land off Shadbolt Avenue and Harbet Road



## Left image

View from Harbet Road towards the reservoir forming the southern boundary of the area

## Right image

View west from Shadbolt Avenue over the banks of the River Lea



# GB Area 1 - Land off Shadbolt Avenue and Harbet Road

## Description

The land is the eastern portion of a thin corridor of Green Belt between the inset edges of South Chingford to the east and Edmonton in the neighbouring London Borough of Enfield to the west. Both settlements form part of the conurbation of Greater London. The eastern boundary of the area is formed by the access road to a motor vehicle garage and a self-storage depot, a Costco and its car park and the A406 North Circular Road. Harbet Road bisects the southern portion of the area, which contains a couple of dwellings and an old water pumping station. The remainder of this southern portion of the area is relatively flat scrubland. To the north of Harbet Road, the area represents a linear piece of scrubland adjacent to the Costco building and the River Lea to the west. Shadbolt Avenue runs through the middle of the area. Boundaries with the wider Green Belt are formed by the A406 North Circular to the north, the raised embankment of a reservoir to the south and the River Lea to the west.

## Impact on contribution

### Purpose 1 Contribution - Check the unrestricted sprawl of large built-up areas

Relatively limited

The land lies on the edge of the large built up area of Greater London and is predominantly open. However, it is relatively 'urbanised' both within the southern half of the area and on adjacent land to the east. In addition, there are a lack of strong boundary features between the inset land to the east and the Green Belt land. The urban areas of Chingford to the east and north and Edmonton to the west provide a sense of containment.

### Purpose 2 Contribution - Prevent neighbouring towns merging into one another

Moderate

The area forms part of the Lee Valley which separates Edmonton to the west from Chingford to the east. The gap between the two settlements (both of which form part of Greater London) is narrow but predominantly visually open, with views between the settlements. Contribution is limited by the presence of urbanising development in the southern portion of the area and to the east, and the two channels of the River Lea to the west represent strong boundaries that in combination perform a separating role. It is considered that the development of the area in the south eastern corner of the site would have a more limited impact on contribution to this purpose as it is well contained by the inset settlement edge and Harbet Road.

### Purpose 3 Contribution - Assist in safeguarding the countryside from encroachment

Relatively limited

The land retains openness north of Harbet Road, but the land to the south of Harbet Road contains a couple of dwellings and an old water pumping station. There is little separation between the land and the inset settlement of Chingford to the east and north, and the River Lea to the west, A404 to the north and embankment of the reservoir to the south create separation from the wider Green Belt. The area of gravel in the south eastern portion of the area is further retained by Harbet road to the east and would therefore have a more limited impact on contribution to this purpose if developed.

### Purpose 4 contribution – Preserve the setting and special character of historic towns

Minimal / no impact

The land forms little or no part of the setting of a historic town within Greater London, within or adjacent to the Borough, nor does it contribute to a historic town's special character. The development of this area would therefore have no impact on the contribution of the land to this purpose.

### Purpose 5 contribution – To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Significant

As predominantly open Green Belt land, the development of this Green Belt land would have a significant impact on the contribution of the land to this purpose.

# GB Area 1 - Land off Shadbolt Avenue and Harbet Road

## Summary of impact of development on contribution to the Green Belt Purposes

All of the Green Belt in the Borough is considered to make a strong contribution to purpose 5. Therefore, any release of Green Belt land is likely to have a significant impact on the contribution of the released land to purpose 5. Development on the entirety of the area would have a moderate impact on preventing the merging of settlements and a relatively limited impact on preventing urban sprawl and encroachment on the countryside. Therefore, if the whole area were developed the impact on contribution to Green Belt purposes would be moderate. However, development of the south eastern corner of the area would have a relatively limited impact on preventing sprawl, the merging of settlements and encroachment on the countryside due to its closer relationship with the settlement edge retained by Harbet Road to the east. Therefore, if this area were to be developed the impact on contribution to Green Belt purposes would be relatively limited.

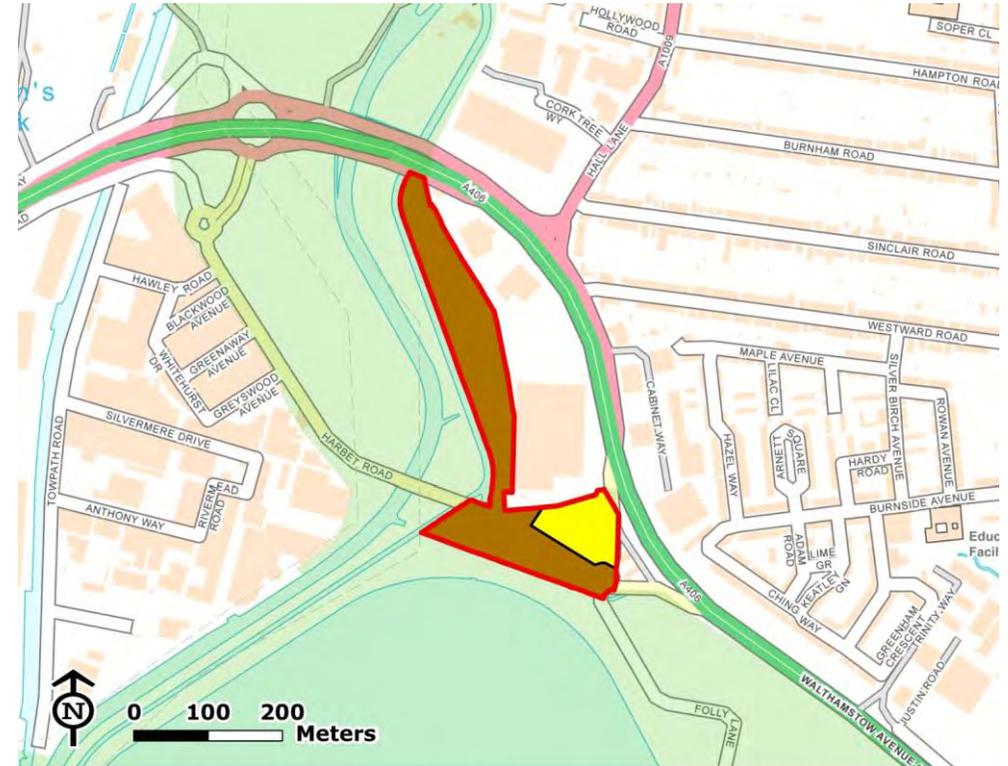
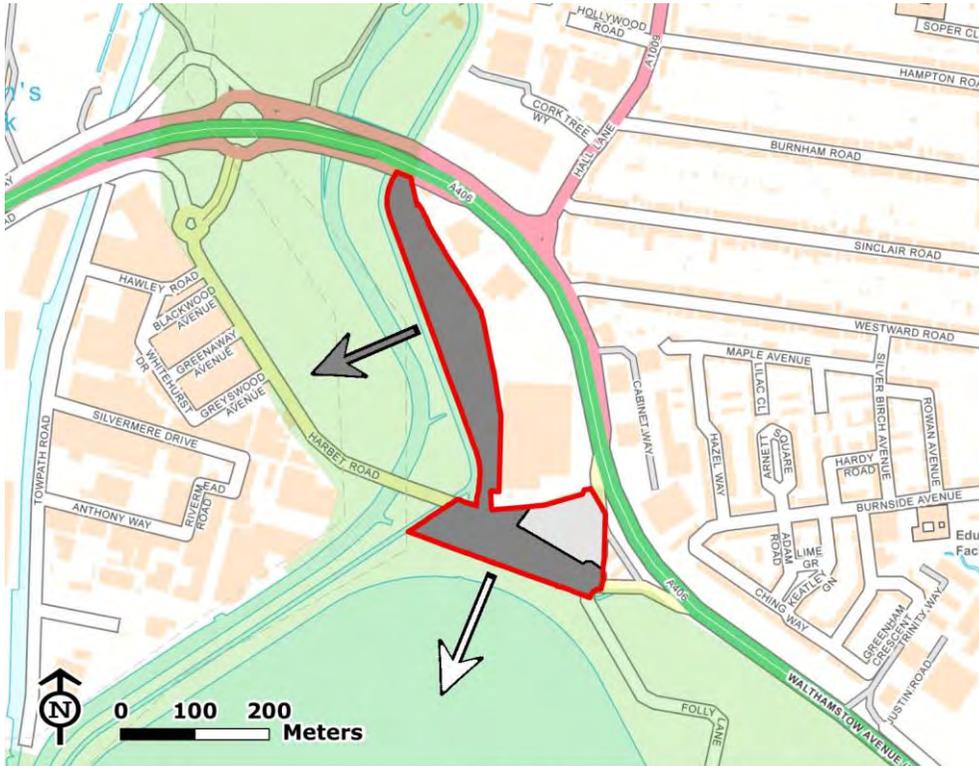
## Impact on adjacent Green Belt

Development of the land would increase containment of the Green Belt land to the west, however the strength of the channels of the River Lea to the west restricts the impact to moderate. Impact on adjacent Green Belt to the south would be minimal due to the strength of the raised embankment of the neighbouring reservoir.

## Potential Green Belt harm resulting from development

Development of the entire area would have a moderate impact on preventing the merging of settlements and would have a moderate impact on adjacent Green Belt land to the west as a direct result of the narrowing of the gap and the resultant increase in containment of the remaining Green Belt. Therefore, the harm to the Green Belt of developing the whole area would be moderate. The south eastern corner of the area is well contained by the inset urban edges to the north and east and, due to the presence of its strong western boundary formed by Harbet Road to the west, its development would not significantly impact the settlement gap. Therefore the harm of developing this area would be low. While land to the south of Harbet Road contains urbanising influences, its development would weaken the settlement gap at one of its narrowest points. Therefore, development of this area in isolation and in combination with the land to the east would cause moderate harm. The land to the east of Shadbolt Avenue is more influenced by the inset urban edge than land to the west of Shadbolt Avenue; however, its development would increase containment of the land to west between the avenue and the river channels, which form stronger boundary features than the existing Green Belt boundary. Therefore, development of this area and the area as a whole would cause moderate harm.

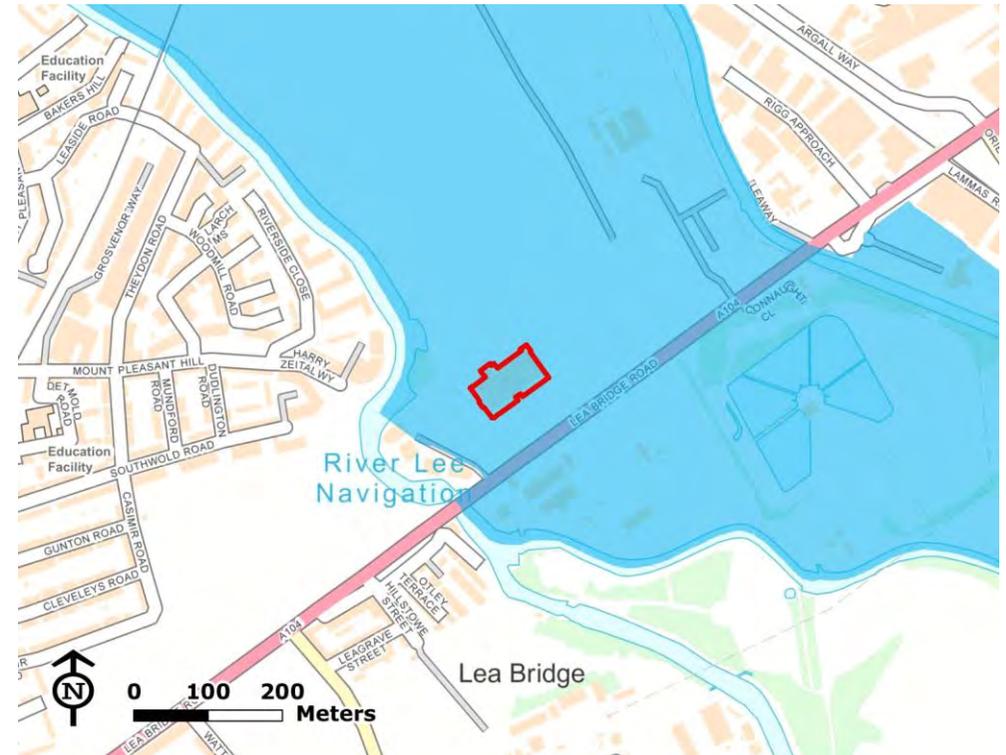
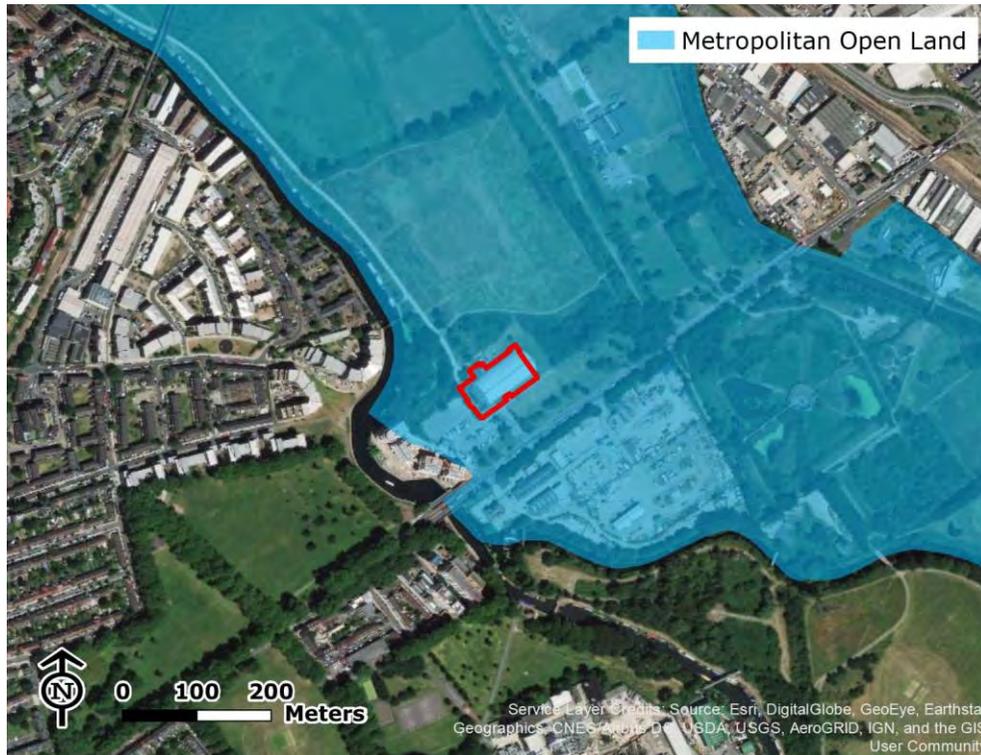
# GB Area 1 - Land off Shadbolt Avenue and Harbet Road



- |  |                        |   |
|--|------------------------|---|
|  | Green Belt             | <b>Step 2 - Impact on Adjacent Green Belt</b> |
| <b>Step 1 - Impact on Contribution</b> |                        |   |
|  | Minimal                |   |
|  | Relatively limited     |   |
|  | Moderate               |   |
|  | Relatively significant |   |
|  | Significant            |   |

- |  |              |                                     |               |          |
|--|--------------|-------------------------------------|---------------|----------|
|  | Green Belt   | <b>Step 3 - Harm of Development</b> |               | Moderate |
|  | Very low     |                                     | Moderate high |          |
|  | Low          |                                     | High          |          |
|  | Moderate low |                                     | Very high     |          |

# MOL Area 1 - Lee Valley Ice Centre



**Left image**  
View of the Ice Centre building



**Right image**  
View of the open land to the south of the building and towards the car park and inset development

# MOL Area 1 - Lee Valley Ice Centre

## Description

The area is occupied by the Lee Valley Ice Centre. A car park and woodland washed over by the MOL designation separates the area from the inset urban edge, which is also bound by the River Lea. The land is entirely urbanised by the Ice Centre, with no open land present. Boundaries with the wider MOL are formed by access roads to the south and west, beyond which is the car park. There are no boundaries to the north and east. Just beyond the building, areas of woodland lie to the north, east and west and the A104 lies to the south. As the area does not adjoin the urban edge.

## Impact of development on openness

### Minimal

The area is wholly developed with the Lee Valley Ice Centre, which compromises its spatial and visual openness. While the ice centre is used for sport and recreation, it is an indoor facility and does not facilitate outdoor sport or recreation. It is therefore considered to be an inappropriate use in MOL.

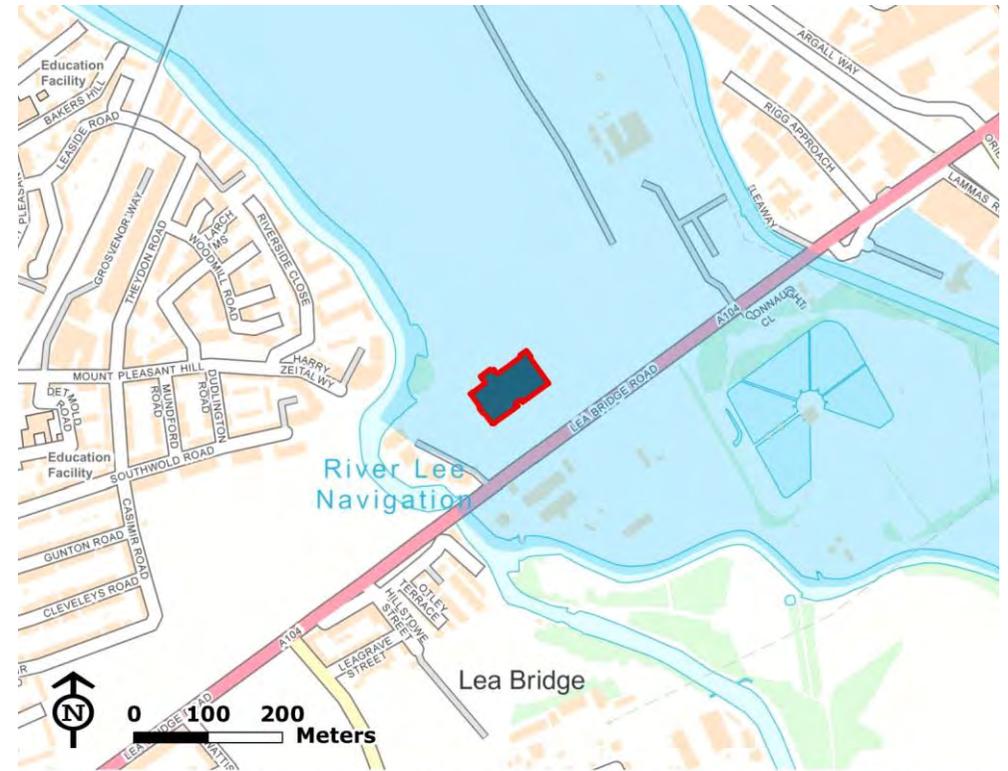
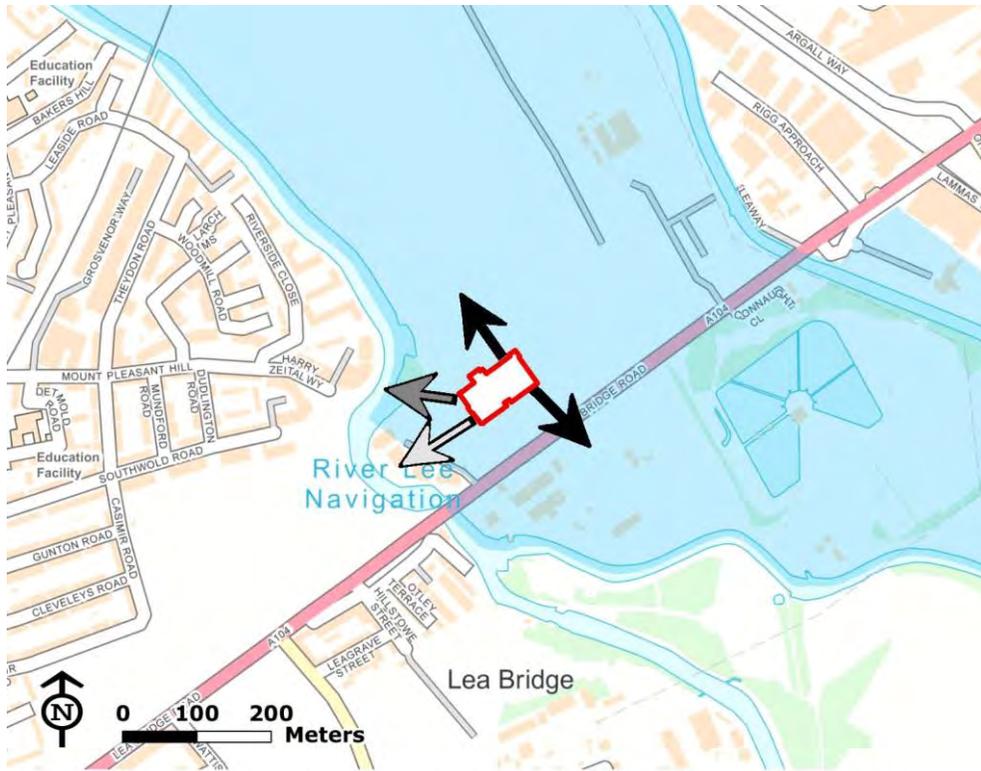
## Impact on adjacent MOL

The site does not adjoin the urban edge. Therefore, the redevelopment of the ice centre is likely to be incongruous within the wider open setting of the MOL and would have a significant impact on adjacent MOL, particularly to the north and south where MOL has the potential to become increasingly contained by the redevelopment of the site. However, the openness of the woodland to the north west and the car park to the south west of the ice centre have already been compromised to a certain extent by the presence of the existing buildings inset at Essex Wharf and the ice centre to the east. To the north west, the presence of the trees and River Lea would likely still retain some sense of openness in this location. This is not the case for the car park to the south west which sits between the inset buildings of Essex Wharf and the ice centre. Furthermore, the open nature of the car park maintains open views of both developments. Taking these factors together, the likely impact of the redevelopment of the site on the MOL to the north west (the woodland) is recorded as moderate and the likely impact of development on the MOL to the south west (the car park) is recorded as relatively limited. Therefore, developing the car park in conjunction with the ice centre would not result in significantly higher harm than the redevelopment of the ice centre in isolation.

## Potential MOL harm resulting from development

Due to the presence of the ice centre (an inappropriate use in MOL), the redevelopment of the land would have a minimal impact on the openness of the MOL within the site. However, the impact on the areas of MOL to the north and south would be significant due to increased containment. Therefore, the harm of redeveloping the site is likely to be high. Due to the containment of the car park to the south west, the harm of redeveloping the area and the adjacent car park would not be significantly higher. Given the location, size, consistent character and land use of the area, no potential variations in harm associated with the redevelopment of smaller pockets of land have been identified.

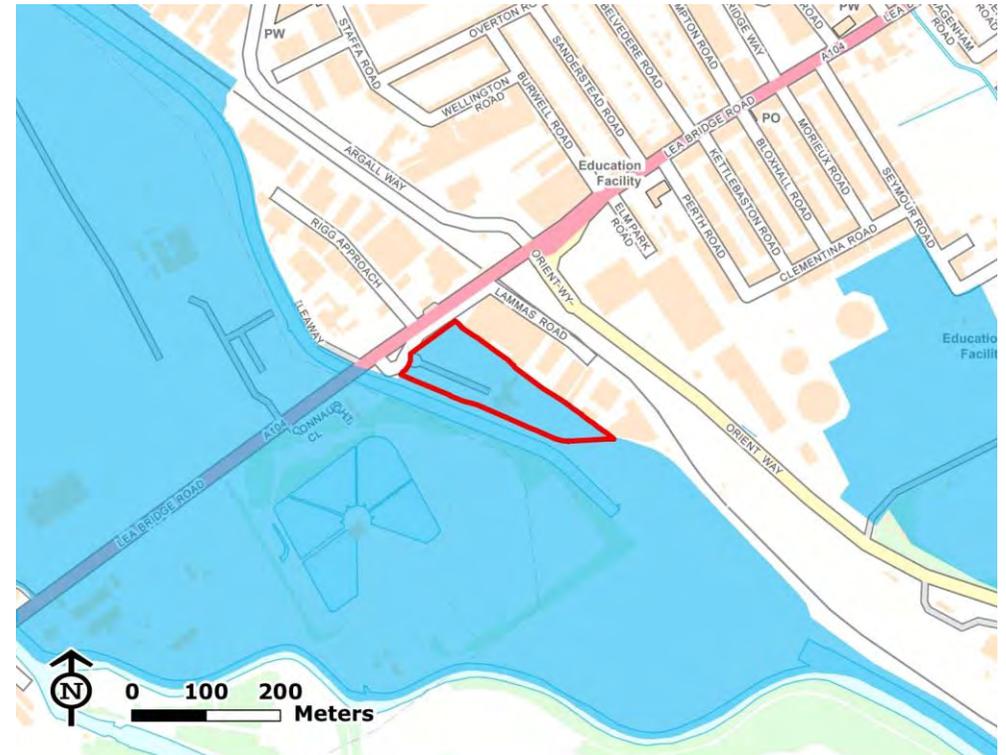
# MOL Area 1 - Lee Valley Ice Centre



- Metropolitan Open Land
- Step 1 - Impact on Contribution**
- Minimal
  - Relatively limited
  - Moderate
  - Relatively significant
  - Significant
- Step 2 - Impact on Adjacent Green Belt**
- Minimal
  - Relatively limited
  - Moderate
  - Relatively significant
  - Significant

- Metropolitan Open Land
- Step 3 - Harm of Development**
- Very low
  - Low
  - Moderate low
  - Moderate
  - High
  - Very high

# MOL Area 2 - Waterworks Visitor Centre



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## Left image

View west through the open grassland towards the rear of the visitors centre



## Right image

View of the entrance to the visitors centre

# MOL Area 2 - Waterworks Visitor Centre

## Description

The area comprises the Waterworks Visitor Centre, its associated car park and small areas of open grassland and small woodland belts located on the edge of the urban area of Leyton. The boundary with the urban area is formed by a tree line and metal fence to the north and by Lammas Road and the A104 to the west. A flood relief channel for the River Lee forms a boundary with the wider MOL to the south, with the exception of the south eastern end of the site which follows a footpath.

## Impact of development on openness

**Moderate**

The tree line to the north and A104 to the west provide some separation from the edge of the urban area, and the land retains a strong relationship with the wider MOL to the south east due to the lack of separating features. Much of the area of MOL is open however there is some containment provided by the urban area. Openness is further limited by the presence of the visitor centre, which also contains the open land to the west. While the centre represents a use which supports the function of the MOL, its scale is significant and is therefore considered to compromise both the spatial and visual openness of the land on which it sits and the adjacent MOL. The impact of redeveloping the MOL on which the centre sits would therefore be minimal. The impact of developing the land to the west of the centre within the site would be relatively limited (despite being contained it is relatively open). The impact of developing the MOL land to the south east of the centre is considered to be moderate due to the fact that it is less well contained and undeveloped.

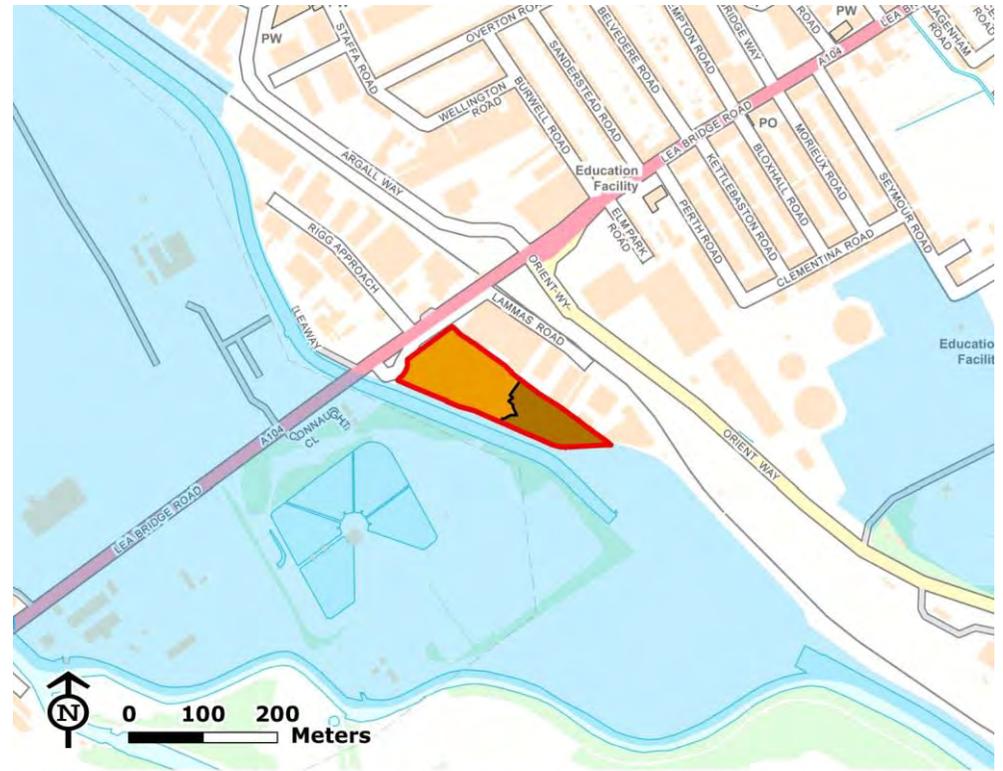
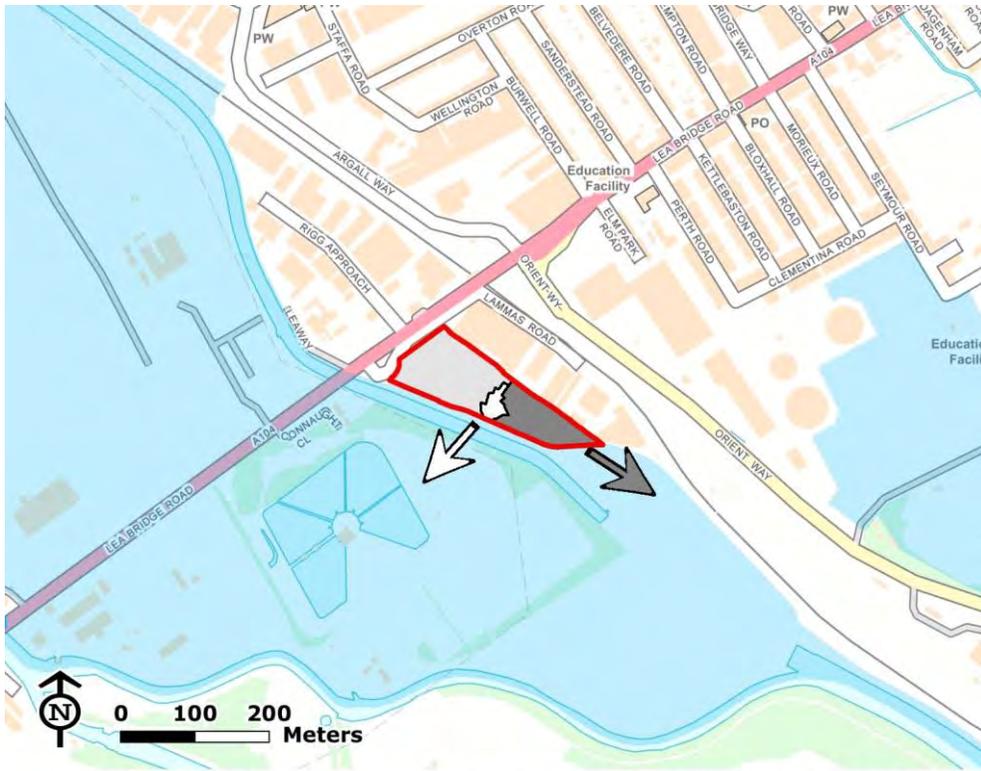
## Impact on adjacent MOL

Development of the land would have a moderate impact on adjacent MOL to the south east, which would likely become more contained. However, the flood relief channel and treeline to the south of the area would provide a strong boundary feature, minimising the impact on the MOL to the south. In this direction, harm to adjacent MOL is recorded as minimal.

## Potential MOL harm resulting from development

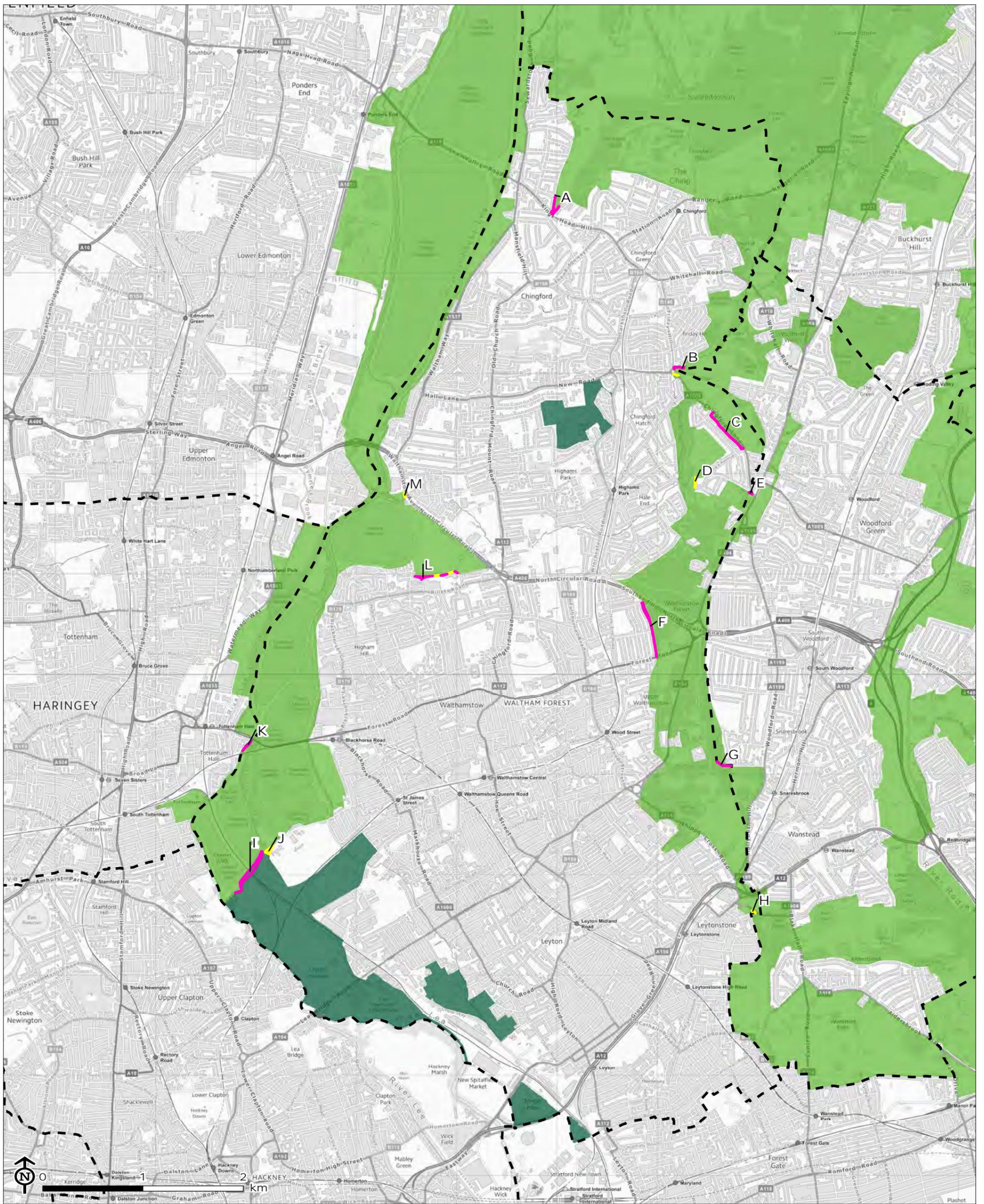
Development of the whole site would have a moderate impact on openness within the site and would have a moderate impact on adjacent MOL to the east, due to the role it would play in increasing containment in this direction. Therefore, the harm to MOL of developing the entire site would be moderate. Limiting development to the area of land on which the visitor centre is located is likely to have a minimal impact on openness on the building footprint as this has already been compromised by the presence of the building. However, the building's redevelopment has the potential to increase containment of the land to the west. Therefore, the harm of redeveloping the centre is unlikely to be significantly different from redeveloping the building in combination with the land to the west. The development of this smaller area of land is considered likely to result in moderate low harm to the remaining MOL as this area is more contained by urbanising development and has a less significant relationship with the wider MOL than the south eastern end of the area.

# MOL Area 2 - Waterworks Visitor Centre



- Metropolitan Open Land
- Step 1 - Impact on Contribution**
- Minimal
  - Relatively limited
  - Moderate
  - Relatively significant
  - Significant
- Step 2 - Impact on Adjacent Green Belt**
- Minimal
  - Relatively limited
  - Moderate
  - Relatively significant
  - Significant

- Metropolitan Open Land
- Step 3 - Harm of Development**
- Very low
  - Low
  - Moderate low
  - Moderate
  - Moderate
  - High
  - Very high



- - - Borough Boundary
- Green Belt
- Metropolitan Open Land
- Removals from Green Belt
- Additions to Green Belt

**Waltham Forest Green Belt and MOL Assessment**

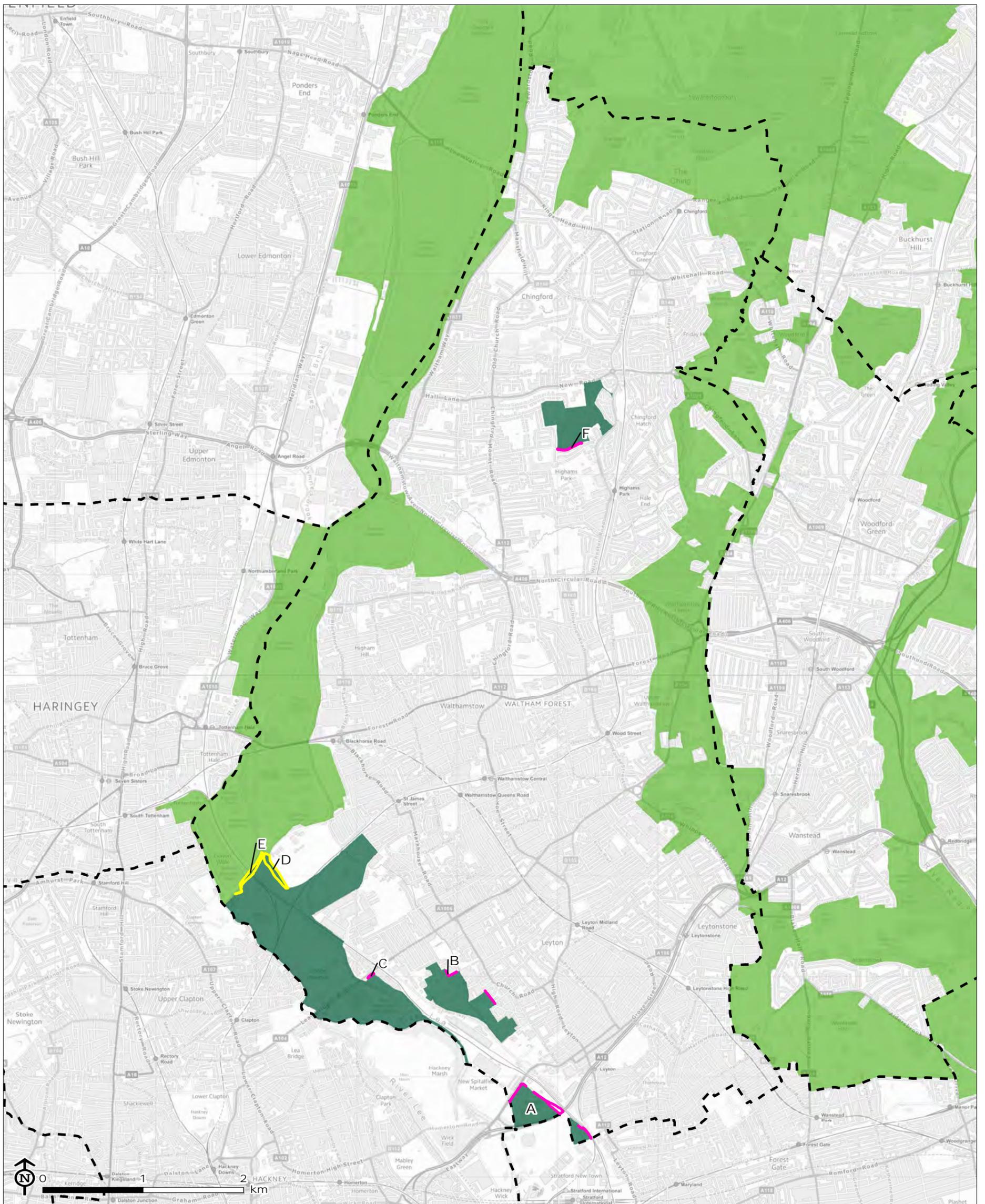
**Figure 2.1: Green Belt Amendments**

Source: CPRE, LBWF

Contains Ordnance Survey data © Crown copyright and database right 2019

Map Scale @A3: 1:37,000





- - - Borough Boundary
- Green Belt
- Metropolitan Open Land
- Removals from Metropolitan Open Land
- Additions to Metropolitan Open Land

**Waltham Forest Green Belt and MOL Assessment**

Figure 2.2: Metropolitan Open Land Amendments

Source: CPRE, LBWF

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Map Scale @A3: 1:37,000



## 3 Next Steps

### Determining planning applications in the Green Belt and MOL

- 3.1 Local Planning Authorities are required to give any harm to the designations substantial weight when considering planning applications. Harm is unlikely to result from applications for development that is regarded as appropriate in designated areas, provided that openness is maintained. Applications for development deemed to be inappropriate, however, will need to demonstrate 'very special circumstances' (see **Appendix 2**).
- 3.2 'Very special circumstances' cannot exist unless the potential harm to the designations by reason of inappropriateness, and any other harm resulting from the proposal, are clearly outweighed by other considerations.
- 3.3 The Borough can use the findings of this Study to help inform future planning judgements on the potential harm caused by development in each of the three locations assessed. However, the exact nature of the harm in each location will only be able to be established once the land use, scale, detailed design and landscaping of each development<sup>2</sup> are known. The findings of this study will help inform how harm could be minimised in each location by avoiding development in certain portions of each site. In addition, there may be potential to mitigate harm further through further site-based measures, or offset harm through compensatory measures elsewhere

#### The concept of mitigation

- 3.4 One of the factors in judging harm to Green Belt or MOL is the impact that the loss of openness would have on other Green Belt land or MOL. This is assessed by considering how neighbouring land would perform were the area in question to be urbanised i.e. would its openness be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 3.5 There is the potential to reduce harm to the remaining Green Belt or MOL by implementing measures which will affect the relationship between the Green Belt land or MOL and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes or the openness of MOL, offsetting to some degree the predicted reduction in contribution/openness, could strengthen the case for the development of a particular area.
- 3.6 There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

#### Mitigation themes

- 3.7 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes and MOL openness are considered to relate to the relationship between the land area in question, inset urban land/developed land and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape / physical elements, including boundary features (in either separating the area from or connecting it) to built-up areas.
- 3.8 **Table 3.1** below lists some mitigation measures that could be considered as part of the planning and development management process. Which mitigation measures are the most appropriate will vary depending on local circumstances.

---

<sup>2</sup> In order to consistently assess harm in each location, 'development' is defined as an inappropriate land use of a similar scale and form to the development immediate adjacent to the site but outside the designation.

**Table 3.1: Potential measures to mitigate harm to Green Belt or MOL**

Mitigation measure	Benefits	Considerations
Use landscape treatment to help integrate a new boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads.	Reducing the risk of sprawl.	The use of buildings and landscape treatment can create strong 'gateways' to strengthen settlement-edge function.
Define the designation edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the designations (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.
Consider ownership and management of landscape elements which contribute to the designations features.	Ensuring permanence of designations.	Trees and hedgerows require management to maintain their value in Green Belt/MOL terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt/MOL.	Increasing perception of open space / countryside.	Although openness in a Green Belt/MOL sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Preserve / enhance	Preserving setting and	Landscape character and

Mitigation measure	Benefits	Considerations
landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character.	special character of historic towns.	historic settings assessment can help to identify valued characteristics that should be retained and if possible strengthened, and intrusive elements that should be diminished and where possible removed.
Enhance access within the Green Belt/MOL.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with value characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoid truncation by major roads, or provision of access along the Green Belt/MOL boundary to strengthen its role.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain / create separation between existing washed-over settlements and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed over settlement's status.	Ensure the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.
Use sustainable drainage features to define / enhance separation between	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Mitigation measure	Benefits	Considerations
settlement and countryside.		

### The concept of enhancement and beneficial use of Green Belt or MOL

- 3.9 In addition to the potential to mitigate harm to the designations, planning applications demonstrating 'very special circumstances' should maximise the potential of development to enable enhancements to the Green Belt and MOL. The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but the NPPF, at paragraph 141, states that:
- "Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*
- 3.10 Furthermore, paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans 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"*. This could be achieved through legal agreements in conjunction with the release of land and/or planning consent for development.
- 3.11 The NPPF suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary / buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.
- 3.12 The accompanying Planning Practice Guidance elaborates on paragraph 138 of the NPPF, endorsing the preparation of supporting landscape, biodiversity or recreation 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.'*
- 3.13 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.
- 3.14 Similarly, the new Draft London Plan states in the supporting text to draft Policy G3 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.

### Potential opportunities for enhancement

- 3.15 Many of the mitigation measures listed in the previous section which relate to Green Belt land and MOL can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land and MOL that (by adding to its value) will strengthen the case for that land's future protection. Some examples are provided in **Table 3.2** below.
- 3.16 Beneficial uses could be achieved through legal agreements in conjunction with the release of land and/or consent for development.

**Table 3.2: Potential Green Belt and MOL enhancements**

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm the designations.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land and MOL has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins and provision of habitat connectivity. Linkages could be provided to identified environmental networks.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect of avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics / qualities of the designations.

- 3.17 Many of the beneficial uses outlined in **Table 3.2** are likely to be identified through the strategic green and blue infrastructure study being currently being prepared by LUC on behalf of the Council.

## Making changes to Green Belt and MOL boundaries

- 3.18 Should the Council decide to allocate the sites (or parts of them) for Green Belt or MOL release within its new Local Plan, the Council will need to demonstrate the necessary 'exceptional circumstances' set out in national planning policy and the London Plan.

### Altering Green Belt boundaries

- 3.19 The NPPF requires changes to the Green Belt to be made through the Local Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 3.20 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless the benefits of the most sustainable locations are outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes<sup>3</sup>. In other words the relatively poor performance of the land against the Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. In fact the release of Green Belt land likely to result in low harm may not be appropriate or sustainable.

<sup>3</sup> Planning on the Doorstep: The big Issues – Green Belt Planning Advisory Service (PAS), 2015.

- 3.21 In developing an 'exceptional circumstances' case it will be necessary to look at the objectively assessed needs for development, the needs to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt. The NPPF sets out clear steps that local authorities need to consider, specifically:
1. making effective use of suitable brownfield sites and underutilised land;
  2. optimising the density of development in town and city centres and other locations well served by public transport; and
  3. exploring whether other authorities can help meet some of the identified development requirement.<sup>4</sup>
- 3.22 Should the Councils conclude *"that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport."*<sup>5</sup> Furthermore, careful consideration will also need to be given to the form of the amended Green Belt boundaries. As set out in paragraph 139 of the NPPF:
- "When defining Green Belt boundaries, plans should:*
- a. ensure consistency with the development plans strategy for meeting identified requirements for sustainable development;*
  - b. not include land which it is unnecessary to keep permanently open;*
  - c. where necessary, identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period;*
  - d. make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
  - e. be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
  - f. define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

### Altering MOL boundaries

- 3.23 The supporting text to draft Policy G3 in the new Draft London Plan states that any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. Therefore, the text outlined in relation to altering Green Belt boundaries applies equally to MOL.

### Next steps

- 3.24 In light of the findings of this Study, the Council should consider the development of appropriate guidance or masterplans for each development.
- Masterplans could draw on the findings of this focussed Green Belt and MOL study and any detailed site-based Green Belt and MOL assessment work to indicate precise development areas and appropriate considerations for the layout and design of new developments. Such an approach, would be particularly helpful for the two MOL sites along Lee Bridge Road. Given the close proximity of these two sites, it would make sense to consider how harm to the MOL might be minimised in both locations in combination rather than in isolation.

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<sup>4</sup> Paragraph 137 of the NPPF.

<sup>5</sup> Paragraph 138 of the NPPF.

# Appendix 1 - Assessment Methodology

## Green Belt Assessment Methodology

1. As a precursor to the area-based assessment of Green Belt, it was necessary to gain a detailed understanding of the functionality of the Green Belt in Waltham Forest and the wider area. **Appendix 2** provides the policy context for the study and includes summaries of the approaches to similar studies undertaken by neighbouring authorities. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology.
2. The assessment of harm considers the extent to which the development of different areas of land would reduce contribution to Green Belt purposes, through both the loss of openness and the resulting impact that this could have on the strength of the adjacent Green Belt. Ratings and supporting analysis in relation to each assessed Green Belt purpose is considered in combination with the potential impact on the integrity of the neighbouring Green Belt to arrive at harm ratings.
3. The assessment of harm includes the following three key steps:
  - **Step 1:** Assessment of the impact of development on the contribution of the site land to each Green Belt purpose.
  - **Step 2:** Assessment of the potential impact of development on the integrity of the adjacent Green Belt, including consideration of the strength of residual Green Belt boundaries.
  - **Step 3:** Assessment of Green Belt harm and any variations of harm within the site.
4. These are explained in more detail below:

### Step 1: Impact on Green Belt contribution within site

5. As outlined in **Appendix 2**, 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.
  - 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.
6. This assessment of impact on contribution is based on the definitions and contribution criteria set out below. The greater the contribution the greater the likelihood of significant impact.
7. The factors that affect the contribution made by land to each purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
  - **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
  - **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
  - **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
  - **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.

8. In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These terms are defined in more detail below.

### *Openness*

9. 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 (2016)) define openness as having both a spatial aspect and a visual aspect.
10. As outlined above, the NPPF identifies openness as an 'essential characteristic' of Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment or providing a setting to a historic town.
11. **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt<sup>6</sup>. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt.
12. **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (purpose 4) includes visual setting<sup>7</sup>. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact this does not diminish the spatial openness of the Green Belt.
13. As noted by the Inspector (see **Appendix 2**) openness should also not be concerned about the character of the landscape, but instead it should relate to the absence of built development and other dominant urban influences.
14. Appropriate development within the Green Belt cannot, according to case law<sup>8</sup>, 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. Whilst there may be cases where the types of development within these lists did not constitute 'appropriate development' due to the specifics of the proposed application (i.e. there may have been a need to justify 'very special circumstances'), it is not possible within the context of this strategic study to identify such cases and a presumption has been made that the development types listed in paragraphs 145 and 146, where identifiable, do constitute 'appropriate development'. This is of relevance to the assessment approach for all of the Green Belt purposes.

### *Permanence*

15. The concept of permanence is a planning consideration rather than a physical or visual characteristic. Green Belt is a permanent planning designation which, once established, should only be altered where exceptional circumstances are fully evidenced and justified, through the

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<sup>6</sup> This point is made in the judgement in Heath & Hampstead Society v London Borough of Camden (2008).

<sup>7</sup> This point is made in the judgement in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016).

<sup>8</sup> 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.

preparation or updating of plans. Therefore, it is recognised that there are benefits in using features which are clearly defined and which also play a physical or visual role in separating town and countryside to act as Green Belt boundaries.

*Purpose 1: To check the unrestricted sprawl of large built-up areas*

16. It is possible to argue that all 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 a detailed, area-based assessment against this strategic purpose.
17. For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to the Borough and what is meant by the term 'sprawl'.

*Definition of 'large built-up area'*

18. There is no standard definition, and no definition provided in the NPPF, for a 'large built-up area'; however it is evident, as noted in **Appendix 2**, that the primary reason for the designation of the London Metropolitan Green Belt was to control the sprawl of the London conurbation. Therefore all settlements and development that is contiguous with the conurbation of London is considered to form part of the large built-up area.

*Definition of 'sprawl'*

19. The PAS guidance states in relation to Purpose 1:

*"The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"*

20. The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on *Urban Form and Sustainability* is also not definitive on the meaning of sprawl:

*"As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. 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."*

21. Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.

*Purpose 1 Assessment Criteria*

22. The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). All of the development forms noted in the RTPI note quoted above have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paragraphs 143-147 of the NPPF<sup>9</sup>).
23. To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that

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<sup>9</sup> 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. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, will make a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it will make a stronger contribution.

24. Urban fringe land uses and the influence of adjacent urban areas, whilst they may reduce the extent to which land is considered to be part of the countryside, do not diminish the extent to which expansion of a large built-up area would be considered sprawl – i.e. this is a key difference between Purpose 1 and Purpose 3.
25. Contribution to Purpose 1 will diminish with distance from the large built-up area, but other factors will influence the range within which new development could potentially be considered sprawl associated with it. The presence of physical features that create clear distinction from the urban area may diminish its range of influence, and likewise the presence of another sizeable urban settlement that is distinctly separate from the large built-up area, with which new development might instead be associated, will diminish the relationship with the large built-up area.
26. In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
  - Does the land lie adjacent to, or in close proximity to the large built-up area?
  - To what extent is the land open, or does it contain existing urban development?
  - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
  - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl? What is the degree of containment by existing built development or other features (e.g. landform)?
27. **Table A1** summarises the criteria used to assess contribution to Purpose 1 and the likely impact of development on contribution.

**Table A1 – Purpose 1 assessment criteria**

<b>Purpose 1: Check the unrestricted sprawl of large built-up areas</b>		
<p><b>Development/land-use:</b> where there is less development, the Green Belt makes a stronger contribution.</p> <p><b>Location:</b> land closer to the large, built-up area generally makes a stronger contribution.</p> <p><b>Separating features:</b> land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p><b>Connecting features:</b> where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p>		
<b>Contribution Rating</b>	<b>Contribution Characteristics</b>	<b>Likely Impact of Development on Contribution</b>
<b><i>Strong</i></b> Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has a strong sense of openness. It relates strongly to the wider countryside as opposed to the urban area.	<b>Significant Impact</b>

<b>Relatively Strong</b> Contribution	Land adjacent or close to the large built-up area that contains very limited urban development and has a strong sense of openness. It relates more strongly to the wider countryside.	<b>Relatively Significant</b> Impact
<b>Moderate</b> Contribution	Land adjacent or close to the large built-up area that contains limited urban development and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.	<b>Moderate</b> Impact
<b>Relatively Weak</b> Contribution	Land adjacent or close to the large built-up area that already contains urban development compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.	<b>Relatively Limited</b> Impact
<b>Weak/No</b> Contribution	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is sufficiently separated or distant from a large built-up area for there to be any significant potential for urban sprawl from the large built-up area.	<b>Minimal/No</b> Impact

*Purpose 2: To prevent neighbouring towns from merging into one another*

28. To ensure that the study takes full account of this purpose, it is necessary to define what constitutes a 'town' within and in close proximity to the Borough.

*Definition of 'towns'*

29. All towns within the London Borough of Waltham Forest form part the larger conurbation of London, there are no towns within the Borough which have not already coalesced with the city. There are, however, distinct settlements within the neighbouring Borough of Epping Forest which lie in close proximity to the built-up area of London that is within Waltham Forest.
30. Epping Forest District's Green Belt Assessment<sup>10</sup> defined the following settlements in Epping Forest as being relevant to Purpose 2:
- Epping
  - Waltham Abbey
  - Loughton (merged with) Debden
  - Chigwell
  - Buckhurst Hill
  - Chipping
  - Ongar
  - North Weald Bassett
  - Theydon Bois

<sup>10</sup> Epping Forest District Green Belt Assessment: Stage 2, LUC, August 2016

- Roydon
  - Lower Nazeing
31. Only **Waltham Abbey** and **Loughton** (merged with) **Debden** are considered to be in close enough proximity to the Green Belt within the Waltham Forest to be considered as a town in this Green Belt assessment.
  32. However, the gaps between suburbs within the Greater London conurbation are also 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 in the west of the Borough separates Chingford, Walthamstow and Leyton within the London Borough of Waltham Forest from Enfield and Edmonton within the London Borough of Enfield, Tottenham within the London Borough of Haringey and Hackney, Stamford Hill and Stoke Newington within the London Borough of Hackney.
    - The remnants of Epping Forest in the east of the Borough separate Chingford, Walthamstow and Leyton within the London Borough of Waltham Forest from Wanstead and Woodford in the London Borough of Redbridge.
  33. The NPPF specifically refers to preventing the merger of towns, not the merger of towns with smaller settlements, or the merger of small settlements with each other. However, it is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements. Full account must therefore be taken of the role that smaller settlements play in preventing the merging of 'towns'. While there are no settlements in between Waltham Forest's large built-up area and Loughton (merged with) Debden, Sewardstone sits in between Chingford and Waltham Abbey. Therefore, the role of Sewardstone in reducing the perceived gap between Chingford and Waltham Abbey should be considered in the assessment of Green Belt land's contribution to Purpose 2 as appropriate.
  34. Following the definition of the large built-up area and towns within and in close proximity to the study area it is possible to establish where the Green Belt gaps lie between them.

#### *Purpose 2 Assessment Criteria*

35. The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considers both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This accords with PAS guidance<sup>11</sup> which 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.
36. Land that is juxtaposed between towns will make a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land will be. Physical proximity is the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will make a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement needs to be 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. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, contribution to Purpose 2 may be reduced.
37. 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. Smaller inset settlements will also reduce the amount of countryside between towns, particularly as perceived from connecting roads. Land that lacks a

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<sup>11</sup> Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.

38. In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, are:

- Does the land lie directly between two settlements being considered under Purpose 2?
- How far apart are the towns being considered?
- Is there strong intervisibility between the towns?
- How do the gaps between smaller settlements affect the perceived gaps between towns?
- Are there any separating features between the towns e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
- Are there any connecting features between the towns e.g. roads, railways which reduce the sense of separation between the settlements?
- What is the overall fragility/ robustness of the gap taking the above into account?

39. **Table A2** summarises the proposed criteria that were used for the assessment of Purpose 2 in the study.

**Table A2 – Purpose 2 assessment criteria**

<b>Purpose 2: Prevent neighbouring towns from merging</b>		
<p><b>Development/land-use:</b> less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p><b>Location:</b> land juxtaposed between towns makes a stronger contribution.</p> <p><b>Size:</b> where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p><b>Separating features:</b> the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p><b>Connecting features:</b> where physical features strengthen the relationship between towns, e.g. where settlements are directly linked by a major road, or have a strong visual connection, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>		
<b>Contribution Rating</b>	<b>Contribution Characteristics</b>	<b>Likely Impact of Development on Contribution</b>
<b>Strong</b> Contribution	Land that plays a highly significant role in inhibiting physical or visual coalescence of towns, such as narrow gaps that are visually open with few separating features.	<b>Significant</b> Impact
<b>Relatively Strong</b> Contribution	Land that plays a significant role in inhibiting physical or visual coalescence of towns, such as narrow gaps with some separating features or wider visually open gaps with few separating features.	<b>Relatively Significant</b> Impact
<b>Moderate</b> Contribution	Land that plays a role in inhibiting physical or visual coalescence of towns, but which	<b>Moderate</b> Impact

	is also bordered by separating features which prevent visual or physical coalescence of towns.	
<b>Relatively Weak Contribution</b>	Land that plays a limited role in inhibiting physical or visual coalescence of towns due to relatively significant separating features which prevent visual or physical coalescence of towns or wider gaps between towns, or a combination of the two.	<b>Relatively Limited Impact</b>
<b>Weak/No Contribution</b>	Land which is not located within a gap between towns, or plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns.	<b>Minimal/No Impact</b>

*Purpose 3: To assist in safeguarding the countryside from encroachment*

40. The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment. To ensure that Waltham Forest takes full account of this purpose, it is necessary to define 'encroachment'.
41. In order to effectively assess the effects of encroachment on countryside, it is important to determine the extent to which Green Belt land:
  - Contains or is influenced by urbanising land uses and features.
  - Relates to adjacent settlements and/or to the wider countryside.
42. Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.
43. Paragraphs 145 and 146 of the NPPF and associated case law provides guidance on into what land uses and features are considered to be 'appropriate' development in the Green Belt (see **Appendix 2**). 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. Whilst there may be cases where the types of development within these lists did not constitute 'appropriate development' due to the specifics of the proposed application (i.e. there may have been a need to justify very special circumstances), it is not possible within the context of this strategic study to identify such cases and a presumption has been made that the development types listed in paragraphs 145 and 146, where identifiable, do constitute 'appropriate development'.
44. The methodology does not distinguish between different 'degrees' of countryside beyond considering urban influence, as this would stray into assessing the impact on landscape character. If land further from an urban area is for example, more 'rural' and tranquil, this is a landscape sensitivity issue.

*Purpose 3 Assessment Criteria*

45. The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising use; the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. its distinction from the urban area or the wider countryside); and its containment.
46. Physical landscape elements (or a lack of them) may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either

through a) the scale of development; or b) the degree of containment of the open land by development. The presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may also give land a strong relationship with a visible urban area even if buildings are not particularly dominant.

47. It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape or visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape or visual point of view. However the same land in Green Belt terms may well make an equal contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
48. In summary, the key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urban development?
  - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
  - Does land relate more strongly to the settlement(s) or to the wider countryside?
49. **Table A3** summarises the criteria that were used for the assessment of Purpose 3 in the study.

**Table A3 – Purpose 3 assessment criteria**

<b>Purpose 3: Assist in safeguarding the countryside from encroachment</b>		
<p><b>Development/land-use:</b> where there is less urbanising land use and more openness, land makes a stronger contribution.</p> <p><b>Separating features:</b> land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.</p> <p><b>Connecting features:</b> an absence of physical features to link settlement and countryside means that land makes a stronger contribution.</p>		
<b>Contribution Rating</b>	<b>Contribution Characteristics</b>	<b>Likely Impact of Development on Contribution</b>
<b>Strong Contribution</b>	Land that contains the characteristics of open countryside i.e. an absence of built or otherwise urbanising uses in Green Belt terms <sup>12</sup> ) and which does not have a relationship with the urban area.	<b>Significant Impact</b>
<b>Relatively Strong Contribution</b>	Land that contains the characteristics of open countryside i.e. a general absence of built or otherwise urbanising uses in Green Belt terms) and which does not have a stronger relationship with the urban area than with the wider countryside.	<b>Relatively Significant Impact</b>

<sup>12</sup> This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

<b>Moderate Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features);  or  Land which retains some degree of openness but which is compromised by urbanising development or uses within it.	<b>Moderate Impact</b>
<b>Relatively Weak Contribution</b>	Land that has very limited characteristics of open countryside and is influenced by urbanising development of a scale, density or form which compromises openness to a notable degree.	<b>Relatively Limited Impact</b>
<b>Weak/No Contribution</b>	Land that does not contain the characteristics of open countryside and is influenced by urbanising development of a scale, density or form which significantly compromises openness.	<b>Minimal/No Impact</b>

*Purpose 4: To preserve the setting and special character of historic towns*

50. The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets.
51. An extract from Hansard in 1988 (HC Deb 08 November 1988 vol 140 c148W 148W) clarifies which historic settlements in England were considered 'historic towns' in the context of the Green Belt purposes:
- Mr. Frank Field: To ask the Secretary of State for the Environment if he will include York, Chester, Bath, Oxford and Cambridge on a list of towns and cities whose Green Belts fulfil the purpose of preserving the special character of historic towns as laid down in Planning Policy Guidance Note 2.
- Mr. Chope: Of all the Green Belt purposes listed in Planning Policy Guidance Note 2 that of "preserving the special character of historic towns" is especially relevant to the Green Belts referred to by the hon. Member.
52. Historic England in their consultation response to the Welwyn Hatfield Stage 3 Green Belt Study (2018) also noted that Durham has since been added to this list.
53. It is therefore considered inappropriate to consider elements of the historic environment which do not relate to historic towns and their wider setting. This is supported by the PAS guidance<sup>13</sup> which states:
- 'This purpose is generally accepted as relating to very few settlements in practice.'*
54. 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. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.

<sup>13</sup> Planning Advisory Service, 2015, Planning on the Doorstep: The Big Issues – Green Belt. Available online at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

55. Key questions include:
- What is the relationship of the land with the historic town?
  - Does the land form part of the setting and/or special character of an historic town?
  - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
56. Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic settlements.
57. The Waltham Forest Characterisation Study<sup>14</sup> describes the Borough's three historic centres:
- **Leyton** and **Leytonstone** in the low lying Lea Valley in the south of the Borough historically provided links between London and the rural hinterland.
  - **Walthamstow** on the high ground in the centre of the Borough.
  - **Chingford** in the north of the Borough was originally a village in Epping Forest which was subjected to significant 20<sup>th</sup> century expansion.
58. Leyton, Leytonstone and Walthamstow represent the two main historic centres comprised of Victorian and Edwardian building stock, including the distinctive Warner developments. Chingford grew slightly later in the 20<sup>th</sup> and 21<sup>st</sup> century. The Warner Estate Company Ltd was registered in 1891 and by 1900 it had built up most of Blackhorse Lane. In 1912 the Company entered into its first town planning scheme with the urban district council, which resulted in the construction of Warner Garden City estates.
59. Although none of these centres is considered to be of a sufficient size to be considered historic towns in their own right, the Borough's Characterisation Study notes the Borough's unique shape being influenced by the valley edge of the low-lying Lea Valley to the west and Epping Forest sitting on a ridge to the east between the valleys of the rivers, both of which contain Green Belt and MOL. Therefore, Green Belt land which forms part of the settings of these historic settlements contributes to the setting and special character of historic London. For example, Pole Hill (in the Green Belt) north of Chingford boasts open views of the Borough and city of London to the south, Epping Forest and the wider Green Belt to the north and the Lee Valley to the east.
60. The Study notes two historic landmarks within the Borough's Green Belt:
- Queen Elizabeth's Hunting Lodge north of Chingford
  - Higham Manor (now Woodford Girls School) on the eastern edge of the Borough in Woodford Green
61. To ensure that the London Borough of Waltham Forest takes full account of this purpose, it is necessary to establish which historic elements of the Borough's historic settlements have a physical and visual relationship with Green Belt and MOL. **Table A4** lists the Borough's Conservation Areas and notes their recorded relationship with the Borough's MOL and the open countryside designated as Green Belt.

**Table A4 – Relationship between historic Waltham Forest and Green Belt and MOL**

Conservation Area	Location	Physical / Visual Relationship with Green Belt and/or MOL	
Browning Road Conservation Area <sup>15</sup>	Leytonstone urban area	No	"The Conservation Area covers a very small area and is largely surrounded by later built developments. These have largely obscured any significant views out of the area..."
Chingford	Chingford	Yes	"The Conservation Area is located on the high ground at

<sup>14</sup> Waltham Forest Characterisation Study (2009)

<sup>15</sup> Browning Road Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke19-browning-road-conservation-area-appraisal.pdf>

Conservation Area	Location	Physical / Visual Relationship with Green Belt and/or MOL	
Green Conservation Area <sup>16</sup>	urban area – high ground overlooking the <b>Green Belt</b> to the west.		<i>the eastern edge of the Lea Valley and there are extensive views across the reservoirs to the west from the top of Kings Head Hill and from the western end of the Green.</i>  Notable landmarks: Grade II* St Peter & St Paul's church
Forest School Conservation Area <sup>17</sup>	West of Walthamstow on the wooded ridge between the Lea and Rodding valleys. Designated as <b>Green Belt</b> .	Yes	<i>"...the Conservation Area is dominated by the Epping Forest land within which it is set"</i>  <i>"Despite its elevated position the forest trees to the north, east, and south, whilst providing an attractive rural backcloth, does effectively prevent any long views into or out of the area."</i>  Notable landmarks: Grade II listed Memorial Hall and shingle-spired chapel.
Leucha Road Conservation Area <sup>18</sup>	Walthamstow urban area west of town centre	No	<i>"Leucha Road survives as a largely original example of the earliest phase of Warner Estate development."</i>  <i>"The low-lying nature of the area means that distant views, both in and out, are restricted, and the only vista of any significance is the view down Leucha Road from St James Street."</i>
Orford Road Conservation Area <sup>19</sup>	Walthamstow urban area – immediately south of historic village centre	No	<i>"With the exception of the attractive tree-lined view up and down Grosvenor Park Road, long views into and out of the area are severely limited by the irregular street pattern and the tight urban grain."</i>
Ropers Field Conservation Area <sup>20</sup>	Chingford directly to the south of Larks Wood – ancient woodland designated as <b>MOL</b>	Yes	<i>The suburban quality of the estate is undoubtedly enhanced by its attractive location between a number of areas of surviving green space which largely surround it. Immediately to the north, opposite 2-53 Inks Green, is Larkswood, a surviving fragment of ancient woodland, once part of the great forest of Waltham...These surroundings areas of open space and woodland contribute significantly to the character of the Ropers Field Estate, giving it almost a rural quality."</i>  <i>"Views into and out of the estate are largely restricted by mature trees around the edges to the north and</i>

<sup>16</sup> Chingford Green Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke20-chingford-green-conservation-area-appraisal.pdf>

<sup>17</sup> Forest School Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke21-forest-school-conservation-area-appraisal.pdf>

<sup>18</sup> Leucha Road Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke22-leucha-road-conservation-area-appraisal-lr.pdf>

<sup>19</sup> Orford Road Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke23-orford-road-conservation-area-appraisal.pdf>

<sup>20</sup> Ropers Field Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke24-ropers-field-conservation-area-appraisal.pdf>

Conservation Area	Location	Physical / Visual Relationship with Green Belt and/or MOL	
			south"
Thornhill Road Conservation Area <sup>21</sup>	Leyton urban area	No	"The Conservation Area has suffered greatly from misinformed and unsympathetic alterations and buildings since its designation in 1988 [notably]...the Thornhill Gardens flats, an uninspiring Council development, [represents] a clumsy termination to eastern views down the street...To the west a modern development of housing on the west side of Church Road now closes off any longer views of the Lea valley, reinforcing the urban context of the street."
Walthamstow Village Conservation Area <sup>22</sup>	Walthamstow Urban Area	No	The Conservation Area is situated near the summit of a hill, and whilst historically this would have given the church tower considerable prominence on the skyline from the south, east and west, the later development of Walthamstow which now totally surrounds the old village nucleus has meant that long views into an doubt of the area have now largely been obscured."

62. **Table A4** summarises the criteria that were used for the assessment of Purpose 4 in the study.

**Table A5 – Purpose 4 assessment criteria**

Purpose 4: Preserve the setting and special character of historic towns		
<p><b>Development/land-use:</b> less developed land makes a stronger contribution.</p> <p><b>Location:</b> an area that contains key characteristics, or important in views to or from them, makes a stronger contribution.</p> <p><b>Separating features:</b> land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution.</p> <p><b>Connecting features:</b> where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.</p>		
Contribution Rating	Contribution Characteristics	Likely Impact of Development on Contribution
<b>Strong</b> Contribution	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's special character or setting.	<b>Significant</b> Impact
<b>Relatively Strong</b> Contribution	The land and its openness makes a significant contribution to the characteristics identified as contributing to a historic town's special character or setting.	<b>Relatively Significant</b> Impact

<sup>21</sup> Thornhill Road Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke25-thornhillroad-conservation-area-appraisal.pdf>

<sup>22</sup> Walthamstow Village Conservation Area Appraisal and Management Plan [online] available at: <https://static.walthamforest.gov.uk/sp/documents/ke26-walthamstow-village-conservation-area-appraisal.pdf>

<b>Moderate</b> Contribution	The land and its openness makes a contribution to the characteristics identified as contributing to a historic town's special character or setting.	<b>Moderate</b> Impact
<b>Relatively Weak</b> Contribution	The land and its openness makes a minor contribution to the characteristics identified as contributing to a historic town's special character or setting.	<b>Relatively Limited</b> Impact
<b>Weak/No</b> Contribution	Land forms little or no part of the setting of a historic town and does not contribute to its special character.	<b>Minimal/No</b> Impact

*Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

63. Most Green Belt reviews 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 one parcel of land makes a higher contribution to encouraging re-use of urban land than another. 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."*
64. In other words, it is debatable whether development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
65. 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.
66. Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent 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. This evidence base provides 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 Waltham Forest's latest Brownfield Land Register has been used to calculate the area of brownfield land within the urbanised<sup>23</sup> area of the Borough.
67. 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.
68. Given the nature of the settlement pattern within Waltham Forest, 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.
69. 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.

<sup>23</sup> The urbanised area constitutes land within the Borough which does not fall within the Green Belt or MOL designations.

70. The London Borough of Waltham Forest Brownfield Register<sup>24</sup> contains a record of roughly 20ha of brownfield land, none of which are located within the Borough's Green Belt and MOL. This represents 0.71% of the total urbanised area (2821.5ha)<sup>25</sup> of the Borough. Although this represents a relatively small proportion of the Borough's total urban area, their location within Greater London provides greater opportunities for higher densities offering the potential to deliver a significant proportion of the Borough's growth needs over the short, medium and long term. Consequently, all Green Belt land within the Borough is considered to make a **strong contribution** to Green Belt purpose 5 and any development of open Green Belt land is likely to have a **significant impact** on the contribution of the developed land to Purpose 5.

### Step 2: Impact on integrity of adjacent Green Belt and boundaries

71. Once the impact on the contribution to the NPPF purpose has been considered, consideration is given to potential impact on the integrity of the adjacent Green Belt and boundaries. This is assessed by considering the extent to which the integrity of the adjacent designated land would be adversely affected through increased *containment* and/or loss of *distinction* between development and open land.
72. If the development creates a less distinct boundary between settlement and countryside, the development site under assessment is likely to weaken the wider Green Belt.
73. A rating will be given for impact on integrity of adjacent Green Belt, using the same six-point scale as Step 1.
74. The extent of this impact will be limited by the strength of adjacent Green Belt – e.g. the increased containment of land that is already largely contained by development will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside.

### Step 3: Green Belt harm

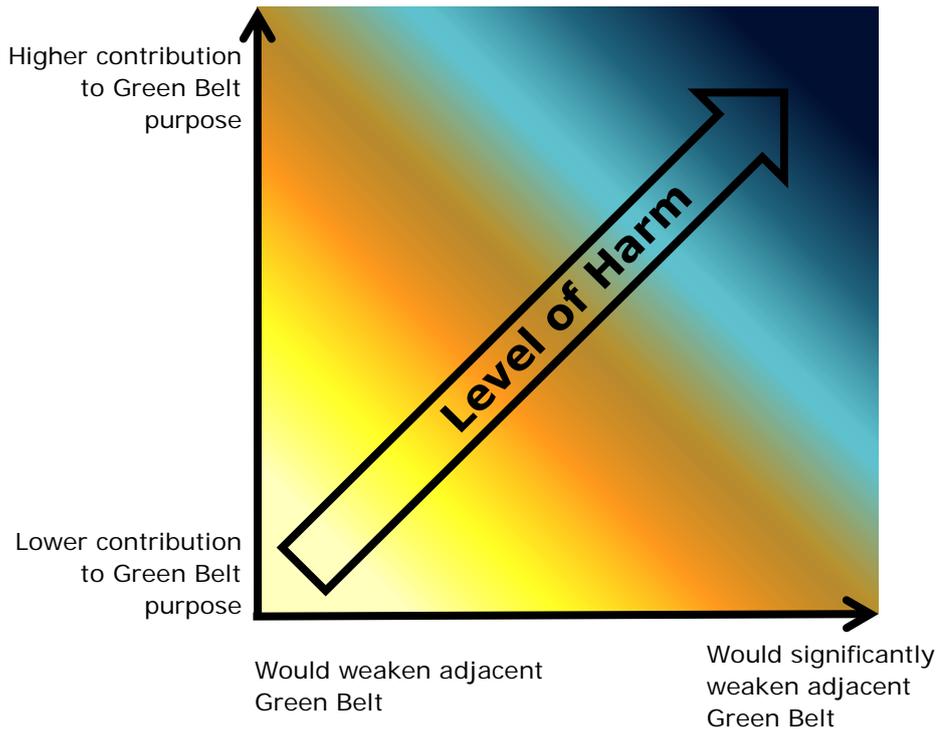
75. Step 3 combines the assessment of the impact on contribution and the assessment of the impact on integrity of the wider Green Belt to come to an overall rating of harm for each Green Belt purpose.
76. **Figure A1** provides an indication as to how the contribution to the Green Belt purpose; the impact on adjacent Green Belt; and the strength of the boundary; influence the overall harm of Green Belt development. However professional judgement will be required in each individual case to consider how much weight to attach to each element of the assessment.

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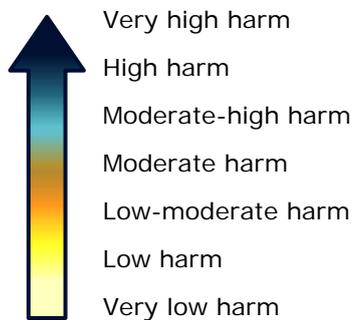
<sup>24</sup> London Borough of Waltham Forest Brownfield Register, London Borough of Waltham Forest, 2018 [online] available at: <https://walthamforest.gov.uk/content/brownfield-land-register>

<sup>25</sup> The total urbanised area of the Borough has been calculated as all land within the Borough that does not fall within Green Belt and MOL.

**Figure A1 – Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact on adjacent Green Belt**



77. Green Belt harm is rated using a seven point scale ranging from very high to very low harm. In this study, no parcels were identified as having very high harm or very low harm to the Green Belt.



78. For example:

- Where development of land has a significant impact on the contribution to a Green Belt purpose, and where its development would weaken the adjacent Green Belt (for example by leaving less open countryside between towns), harm is likely to be **very high**.
- Where development of land has a significant impact on contribution on a Green Belt purpose, and where its development would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**.
- Where development of land has a moderately significant impact on the contribution to a Green Belt purpose, but where its development would significantly weaken the adjacent Green Belt (for example by urbanising an area of Green Belt that makes a stronger contribution), harm is likely to be **moderate-high**.
- Where development of land has a moderately significant impact on the contribution to a Green Belt purpose, but where its development would partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land), harm is likely to be **moderate**.

- Where development of land has a moderately significant impact on the contribution to a Green Belt purpose, but where its development would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
  - Where development of land has a relatively limited impact on the contribution to a Green Belt purpose and its development would not weaken the integrity of adjacent Green Belt land, harm is likely to be **low**.
  - Where development of land has limited or no impact on the contribution to a Green Belt purpose, and its development would not weaken the integrity of adjacent Green Belt land harm is likely to be **very low**.
79. Based on a review of the potential harm to *each* Green Belt purpose, an overall judgement is reached on the potential harm to the area being assessed.
80. The land use, scale, detailed design and associated landscaping of a development is likely to significantly influence its overall harm to the designation. In order to consistently assess harm in each location, 'development' is defined as an inappropriate land use of a similar scale and form to the development immediate adjacent to the site but outside the designation.
81. The impact on Green Belt purposes of the developed land is not inherently related to the size of the area, in that the contribution of land depends on its relationship with settlements (large built-up areas, neighbouring or historic towns) and countryside. However the development of a larger area clearly has more potential to weaken the Green Belt by encroaching 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. The analysis of harm as a progression of land developed out from an inset settlement edge allows variations in this impact to be judged. Therefore, where appropriate within the site areas identified, land has been divided up as necessary into 'sub-areas' to reflect assessed variations in harm to Green Belt purposes. Detailed justification is provided for each rating given. An overall rating has also been provided for the potential harm of developing the site in its entirety.
82. Unless assessment areas are located away from the inset settlement edge in the Green Belt, the assessments assume that land would be developed out from an inset settlement edge, as typically harm will increase with distance from the Green Belt boundary (if it is not already judged to be high immediately beyond the settlement edge).

### *Minimising harm*

83. There is also the potential to reduce harm to the Green Belt by implementing measures which will affect the relationship between the Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the 'very special circumstances' case for development of a particular area. These may include measures such as:
- avoiding the areas where the harm to the Green Belt is likely to be highest;
  - landscape treatment to strengthen the existing Green Belt edge, aiming to maximise consistency over a longer distance; and,
  - strengthening boundaries at weak points – e.g. where 'breached' by roads.

## MOL Assessment Methodology

84. The adopted London Plan Policy 7.17<sup>26</sup> (2011) states that national Green Belt policy applies equally to MOL. This statement can be interpreted to mean that the essential characteristics and purposes of Green Belt also apply to MOL<sup>27</sup>. However, the new MOL policy (G3) in the new Draft

<sup>26</sup> London Plan (2011) [online] available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-seven-londons-living-spac-19>

<sup>27</sup> **Appendix 2** sets out how the principles of national Green Belt policy are considered to apply to MOL, including the Green Belt purposes.

London Plan<sup>28</sup> states that MOL is afforded the same 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 designation's boundaries (i.e. the need to set out exceptional circumstances). This policy change<sup>29</sup> effectively acknowledges that the purposes of the designations, although similar, are different.

85. Being embedded within the Greater London conurbation London's MOL cannot check London's outward sprawl (Purpose 1) or prevent neighbouring towns from merging (Purpose 2). While MOL can assist in safeguarding countryside from encroachment (Purpose 3) and preserve the setting and special character of historic London (Purpose 4), these attributes are redefined in the four MOL criteria for designating new MOL.
86. The essential characteristics of Green Belts – openness and permanence – apply equally to MOL. Both characteristics apply to Criterion 1<sup>30</sup> 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).
87. 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 or links (Criterion 4). However, it is the contribution of the openness of the land to these facilities and features that is protected through MOL rather than the facilities and features themselves, i.e. there are other international, national, regional and local planning and environmental designations which protect such facilities and features. Consequently, this assessment of MOL focuses on the openness of the areas identified and the likely harm to the openness of MOL as a result of its development.
88. Much like the assessment of Green Belt harm set out in **Chapter 2** above, the assessment of MOL harm includes the following three key steps:
  - **Step 1:** Assessment of site openness and therefore the impact of MOL development on site.
  - **Step 2:** Assessment of the potential impact of MOL development on the openness of MOL.
  - **Step 3:** Assessment of MOL harm and any variations of harm within the site.
89. These are explained in more detail below:

#### **Step 1: Impact of development on MOL openness on site**

90. As set out in **Chapter 2**, openness is considered to have both 'spatial' and 'visual' aspects. To assess the existing spatial openness of MOL consideration is given to the scale, form and density of built development in the MOL. To assess the existing visual openness of MOL consideration is given to the role of topography, vegetation, buildings and linear features such as roads and railways in maintaining or screening open views of the wider MOL. It is important to note that while vegetation or landform can provide visual enclosure to development that lessens its visual impact this does not diminish the spatial openness of the MOL.
91. **Table A6** sets out the criteria for rating MOL openness and therefore assessing the likely impact of each site's development on the openness of the site.

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<sup>28</sup> New Draft London Plan (2019) [online] available at: [https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_consolidated\\_changes\\_version\\_-\\_clean\\_july\\_2019.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf)

<sup>29</sup> 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.

<sup>30</sup> London Plan Policy 7.17 sets out the four criteria required to designate open land as MOL (see **Appendix 2**).

**Table A6 – MOL Openness Ratings**

<b>MOL Openness</b>		
<b>Openness Rating</b>	<b>Openness Characteristics</b>	<b>Likely Impact on Openness of Site</b>
<b>Strong Openness</b>	Wholly open MOL free from buildings and structures that compromise spatial and visual openness.	<b>Significant Impact</b>
<b>Relatively Strong Openness</b>	MOL free from significant buildings and structures which compromise spatial openness, but visual openness is reduced by neighbouring development.	<b>Relatively Significant Impact</b>
<b>Moderate Openness</b>	MOL largely free from significant buildings and structures that compromise openness; however, some buildings and structures compromise spatial and/or visual openness.	<b>Moderate Impact</b>
<b>Relatively Weak Openness</b>	MOL within close proximity to significant buildings and structures that compromise spatial and visual openness.	<b>Relatively Limited Impact</b>
<b>Weak / No Openness</b>	MOL which is wholly developed by buildings and structures that compromise spatial and visual openness.	<b>Minimal/No Impact</b>

**Step 2: Impact on integrity of adjacent MOL and boundaries**

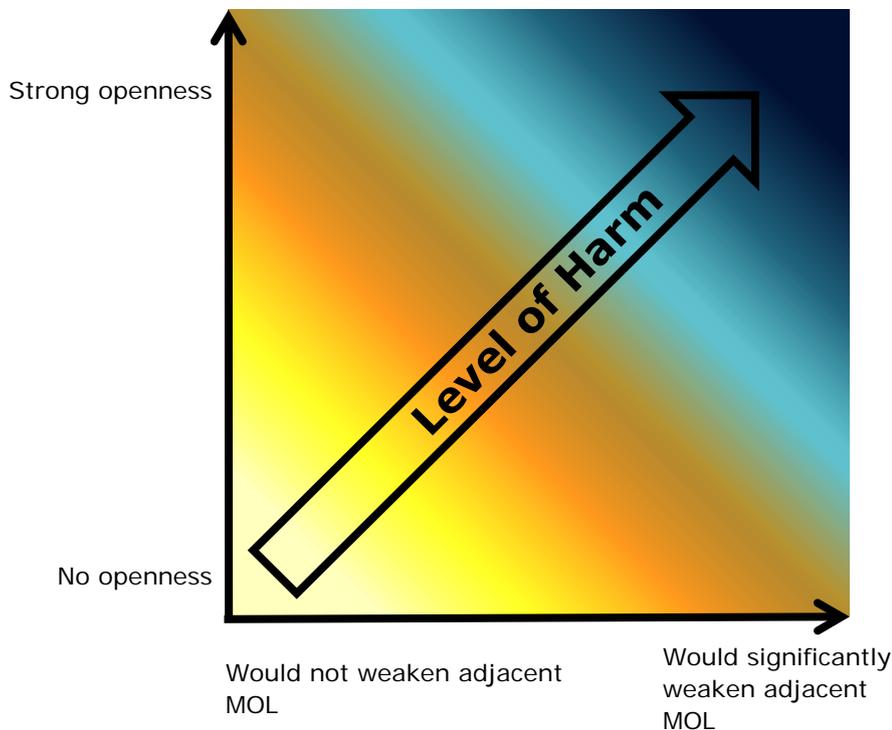
92. Once the impact on the openness of the specific site has been considered, consideration is given to potential impact on the openness of the adjacent MOL and boundaries. This is important as, whilst a site may not be particularly open its own right, its location within the MOL may have the potential to affect the openness of neighbouring MOL and the wider integrity / strategic functioning of the MOL.
93. Impact on integrity of adjacent MOL is assessed by considering how neighbouring land would rate in terms of its openness, i.e. would its openness be lessened? A site might in itself be small, but its development could represent a more significant change in openness than its physical area might suggest if, for example, this resulted in the development of a prominent area of MOL. Consideration will be given to the extent to which adjacent land will incur loss of integrity through increased containment and/or loss of distinction between development and open land.
94. With regard to boundaries, if the development is likely to create a less distinct boundary between the urban area and the MOL, the development is likely to weaken the wider MOL, due to increased containment.
95. The extent of this impact will be limited by the existing openness of adjacent MOL – e.g. the increased containment of land that is already largely developed or contained by development will constitute less of an impact than the containment of land that has a stronger relationship with the wider MOL.

**Step 3: MOL harm**

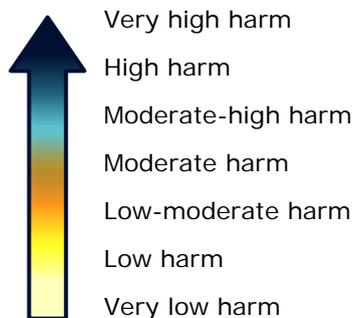
96. Step 3 combines the assessment of the impact on site openness and the assessment of the impact on integrity of the wider MOL to come to an overall rating of harm.

97. **Figure A2** provides an indication as to how site openness; the impact on adjacent MOL influence the overall harm of MOL release. However professional judgement will be required in each individual case to consider how much weight to attach to each element of the assessment.

**Figure A2 – Guidelines for rating harm on the basis of site openness and impact of release on adjacent MOL**



98. Like Green Belt harm, MOL harm is rated using a seven point scale ranging from very high to very low harm. In this study, no parcels were identified as having very high harm or very low harm.



99. For example:

- Where development of land has a significant impact on MOL openness, and where its development would weaken the adjacent MOL, harm is likely to be **very high**.
- Where development of land has a significant impact on MOL openness, and where its development would partially weaken adjacent MOL, harm is likely to be **high**.
- Where development of land has a moderately significant impact on MOL openness, but where its development would significantly weaken the adjacent MOL, harm is likely to be **moderate-high**.
- Where development of land has a moderately significant impact on MOL openness, but where its development would partially weaken the adjacent MOL (for example by increasing containment of adjacent open land), harm is likely to be **moderate**.
- Where development of land has a moderately significant impact on MOL openness, but where its development would not weaken the adjacent MOL, harm is likely to be **low-moderate**.

- Where development of land has a relatively limited impact on MOL openness and its development would not weaken the integrity of adjacent MOL, harm is likely to be **low**.
- Where development of land has limited or no impact on MOL openness and its development would not weaken the integrity of adjacent MOL harm is likely to be **very low**.

100. The land use, scale, detailed design and associated landscaping of a development is likely to significantly influence its overall harm to the designation. In order to consistently assess harm in each location, 'development' is defined as an inappropriate land use of a similar scale and form to the development immediate adjacent to the site but outside the designation.

101. The impact on MOL openness is not inherently related to the size of the area of development, in that the openness of land depends on its relationship with the wider MOL and the urban area. However, the development of a larger area clearly has greater potential to weaken the MOL by extending into areas that have a greater distinction from the urban area, by diminishing the extent to which the remaining open land relates to the wider MOL. The analysis of harm as a progression of MOL development out from a urban edge allows variations in this impact to be judged. Therefore, where appropriate within the site areas identified, land has been divided up as necessary into 'sub-areas' to reflect assessed variations in harm to MOL openness. Detailed justification is provided for each rating given. An overall rating has also been provided for the potential harm of developing the site in its entirety.

102. Unless assessment areas are located away from the urban edge in the MOL, the assessments assume that land would be released from the urban edge, as typically harm will increase with distance from that boundary (if it is not already judged to be high immediately beyond the urban edge).

#### *Minimising harm*

103. There is also the potential to reduce harm to the MOL by implementing measures which will affect the relationship between the remaining MOL and the built up areas. Measures which serve to maintain a greater level of openness could strengthen the 'very special circumstances' case for the development of a particular area. These may include measures such as:

- avoiding the areas where the loss of MOL openness is likely to be greatest;
- using landscape treatments to create greater distinction between the urban edge and MOL; and,
- strengthening boundaries at weak points – e.g. where 'breached' by roads.

# Appendix 2 - Green Belt and MOL Policy and Guidance

## Origins and Evolution of the Metropolitan Green Belt

104. Waltham Forest's Green Belt forms part of the Metropolitan Green Belt. The principle of maintaining a ring of open country around London can be traced back to the 16<sup>th</sup> century when, by royal proclamation, Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis.
105. The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 *Tomorrow: a Peaceful Path to Real Reform* in which he referred to "*an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside- field, hedgerow and woodland*".
106. The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. The most active agency in this field was the City of London Corporation whose programme of acquisition, initiated in 1878, included Hampstead Heath, Epping Forest and Kenley Common.
107. 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.
108. 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.
109. 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.
110. Emphasis upon 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 in exceptional circumstances was established through Circular 14/84.
111. 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).
112. PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012<sup>31</sup> and this document currently provides national Green Belt policy. The Government published updated versions of the NPPF in July 2018 and February 2019 and the latest version currently represents national Green Belt policy for consultation. The current and evolving Green

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<sup>31</sup> Department of Communities and Local Government, 2012, National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

Belt position of the Government in relation to Green Belt provided through the NPPF is detailed later in this report.

113. The Greater London Development Plan (GLDP)<sup>32</sup>, approved in 1976, defined the full extent of the London Metropolitan Green Belt, including within Waltham Forest. 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*".
114. As of March 2017 the entirety of the Metropolitan Green Belt covers around 514,000 hectares, across London, the East and South East of England. Roughly 40% of the Metropolitan Green Belt falls in London. Land within the Metropolitan Green Belt accounts for approximately 31% of the total 1,634,700 hectares of Green Belt land in England<sup>33</sup>.

## Origins of Metropolitan Open Land

115. 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.
116. 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 predominantly open uses as much as Green Belt'.
117. The London Planning Advisory Committee (LPAC) produced a more detailed definition of MOL using four criteria set out in the Strategic Planning Guidance for London (1994)<sup>34</sup>. These criteria were the first iteration of MOL criteria included in the adopted London Plan. Two years later, the Secretary of State published MOL guidance in its 'Strategic Guidance for London Planning authorities'<sup>35</sup> (RPG3) in 1996. RPG3 identified very similar criteria to the Strategic Planning Guidance for London (1994) but added further guidance:
- 'Where isolated pockets of Green Belt exist that are not part of a continuous pattern of open land surrounding London, authorities should consider whether it would be more appropriate to designate the land as MOL in recognition of its location and use, having regard to the guidance on MOL...'; and
- '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'.
118. This general approach has been carried forward into the current London Plan<sup>36</sup> (adopted in 2011), which replaced RPG3. A new Draft London Plan has been submitted to the Secretary of State for Housing, Communities and Local Government by the Greater London Authority (GLA) and is currently undergoing Examination by the Planning Inspectorate. The London Plan affords the same level of protection to MOL as to the Green Belt, making national Green Belt policy, set out

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<sup>32</sup> Greater London Council, 1976, Greater London Development Plan

<sup>33</sup> GIS data from the Department for Communities and Local Government, 2017

<sup>34</sup> London Planning Advisory Committee, 1994, Advice on Strategic Planning Guidance for London

<sup>35</sup> Government Office for London, 1996, Strategic Guidance for London Planning Authorities available at:

<http://regulations.completepicture.co.uk/pdf/Planning/Strategic%20guidance%20for%20London%20planning%20authorities.pdf>

<sup>36</sup> Mayor of London, 2016, The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011, [online] available at: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2016\\_jan\\_2017\\_fix.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf)

in the NPPF, equally relevant to planning new and changes to existing areas of MOL. Current and evolving MOL policy is detailed later in this report.

## National Planning Policy

119. Government policy on Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)<sup>37</sup> and associated National Planning Practice Guidance<sup>38</sup>. Paragraph 133 of 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'*.
120. This is elaborated in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out below.

### The purposes of Green Belt

- 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.

121. The NPPF emphasises in paragraph 135 and 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. 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 Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.'*
122. Paragraph 137 of the NPPF requires that the 'strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development' before concluding that the exceptional circumstances exist (paragraph 137), specifically whether the strategy:
- *'makes as much use as possible of suitable brownfield sites and underutilised land;*
  - *optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*
  - *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'*
123. Paragraph 138 of the NPPF indicates that *'when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first*

<sup>37</sup> Ministry of Housing, Communities and Local Government, 2019, National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733637/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>38</sup> Ministry of Housing, Communities and Local Government, 2019, National Planning Practice Guidance [online] available at: <https://www.gov.uk/guidance/green-belt>

*consideration to land which has been previously developed and / or is well served by public transport. They should also 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.*<sup>39</sup>

124. Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.

125. Paragraph 135 of the NPPF indicates that, if proposing new Green Belt, local planning authorities should:

- Demonstrate why normal planning and development management policies would not be adequate;
- Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- Show what the consequences of the proposal would be for sustainable development;
- Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- Show how the Green Belt would meet the other objectives of the Framework.

126. Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states "*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).

127. It is important to note, however, that these positive roles should be sought for 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 being kept permanently open. Openness is not synonymous with landscape character or quality.

128. 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.*"

129. Paragraphs 145 sets out the types of development that are appropriate in the Green Belt:

- *'buildings for agriculture and forestry;*
- *appropriate facilities 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:*

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<sup>39</sup> This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- *not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
- *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.*

130. 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 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.'*

### Planning Practice Guidance

131. The NPPF's Green Belt policies are supplemented by additional planning practice guidance. The guidance 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<sup>40</sup>. 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.

132. 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 recreation 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.'*

133. 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.

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<sup>40</sup> 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 (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section in Appendix 2 below.

# London Planning Policy

## Adopted Green Belt Policy

134. The positive role of the Green Belt is reflected in the adopted London Plan (2011) <sup>41</sup>, which states:

*"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."*

135. The Mayor strongly supports the current extent of Green Belt and its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of Green Belt.

## Adopted MOL Policy

136. The London Plan (2011) 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. Policy 7.17 of the London Plan states that, to designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

- It contributes to the physical structure of London by being clearly distinguishable from the built up area
- 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
- It contains features or landscapes of either national or metropolitan value
- It forms part of a Green Chain or link in the network of green infrastructure and meets one of the above criteria.

137. 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.

138. The supporting text to the London Plan MOL Policy 7.17 states:

- the policy guidance of paragraphs 79-92 of the NPPF<sup>42</sup> on Green Belts applies equally to MOL.
- 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.

### *The principles of National Green Belt policy applicable to MOL*

139. Given the adopted Policy 7.17 (2011) states that all Green Belt Policy applies equally to MOL it is necessary to consider how the principles of national Green Belt policy apply to London's MOL, including the Green Belt purposes.

140. Being embedded within the Greater London conurbation London's MOL cannot check London's outward sprawl (Purpose 1) or prevent neighbouring towns from merging<sup>43</sup> (Purpose 2). While MOL can assist in safeguarding countryside from encroachment (Purpose 3) and preserve the

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<sup>41</sup> Mayor of London, 2016, The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011, [online] available at: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2016\\_jan\\_2017\\_fix.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf)

<sup>42</sup> This relates to the national Green Belt policy in the original NPPF published in 2012.

<sup>43</sup> It is, however, acknowledged that MOL can maintain a sense of division within London, separating distinct areas and therefore contributing to the physical structure of the urban area.

setting and special character of historic London (Purpose 4), these attributes are translated into the four MOL criteria for designating new MOL. Most MOL does assist in urban regeneration, by protecting open greenfield land and in so doing encouraging the recycling of derelict and other urban land (Purpose 5) and this purpose is not directly covered by the MOL criteria; however it is not possible to draw a meaningful distinction between the availability of brownfield land in different parts of the Borough. Therefore, all MOL in the Borough is considered to make an equally **strong contribution** Purpose 5. This contribution is considered to be equally relevant to all the MOL within Waltham Forest.

141. The following other principles of national Green Belt policy are applicable to MOL planning<sup>44</sup>:

- The essential characteristics of Green Belts are their openness and permanence (paragraph 133).
- Green Belts should only be established in exceptional circumstances, for example when planning for major urban extensions, 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 that 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).
- Green Belt boundaries should only be altered in exceptional circumstances through the preparation of Local Plans and once redefined should endure beyond the plan period (paragraph 136).
- In reviewing Green Belt boundaries local planning authorities must take account of the need to:
  - Make as much use as possible of suitable brownfield sites and underutilised land (paragraph 137);
  - Optimise the density of development and other locations well served by public transport (paragraph 137);
  - Discuss with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground (paragraph 137); and
  - Promote sustainable patterns of development (paragraph 138).
- In defining Green Belt boundaries local planning authorities must:
  - 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 (paragraph 139).
- When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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 (paragraph 144).
- New buildings in the Green Belt are inappropriate, unless:
  - buildings for agriculture and forestry;

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<sup>44</sup> The list of NPPF Green Belt principles has been limited to those which are not directly set out in the London Plan MOL policy.

- 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 (including policies for rural exception sites); 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 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 (paragraph 145).
- Other forms of development that are not inappropriate in the Green Belt, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt, 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 and burial grounds); and,
  - development brought forward under a Community Right to Build Order (paragraph 146).

### **New Draft London Plan Policy**

142. The new Draft London Plan was submitted to the Secretary of State in 2018 and subjected to examination by the Planning Inspectorate in 2019. At the time of preparing this assessment, the Inspectors' findings have yet to be published; however, given the advanced stage of the new London Plan and its potential imminent adoption, its contents, specifically its policies on Green Belt and MOL, represent a significant material consideration.

#### *New Green Belt Policy*

143. The adopted Green Belt Policy 7.16 has been replaced by Policy G2 in the new Draft London. There are no material changes to the policy, which is consistent with national Green Belt policy.

#### *New MOL Policy*

144. Draft Policy G3 in the Draft London Plan has the following differences to the current adopted Policy 7.17 (2011):

- The supporting text to Policy G3 does not state that all national Green Belt policy applies equally to MOL like the original did. Instead, the policy states that MOL is afforded the same level of protection and is therefore protected from inappropriate development in accordance with national planning policy tests that apply to Green Belt, specifically the demonstration of exceptional circumstances.

- Draft Policy G3 states that ‘development proposals that would harm MOL should be refused’ as opposed to the adopted Policy 7.17 which makes reference to protecting the openness of MOL and contains supporting text which limits appropriate development to small scale structures to support outdoor open space. There is no definition of MOL harm; however, it can be assumed that this relates directly to impacts on the openness of MOL and the contribution of such openness to the features and facilities for which the land is designated.
- 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.
- Section C of the Policy states 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 by reference to each of the criteria in Part B.
- 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.

## Other Relevant Guidance and Case Law

### Planning Advisory Service and Guidance

145. Neither the National Planning Policy framework (NPPF) nor National Planning Practice Guidance (PPG) provides guidance on how to undertake Green Belt reviews. However, the Planning Advisory Service (PAS) have published a useful advice note that discuss some of the key issues associated with assessing Green Belt. However, it should be noted that this guidance does not represent statutory guidance.

146. The PAS Guidance<sup>45</sup> considers the way in which the five purposes of Green Belt should be addressed, as follows:

- Purpose 1: To Check the Unrestricted Sprawl of large built up areas – this should consider the meaning of the term ‘sprawl’ and how this has changed from the 1930s when Green Belt was conceived.
- Purpose 2: To Prevent Neighbouring Towns from merging into one another – assessment of this purpose will be different in each case and a ‘scale rule’ approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.
- Purpose 3: To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
- Purpose 4: Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
- Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

147. It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which

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<sup>45</sup> Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015)

should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.

148. The guidance goes on to list the types of areas of land that might 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:

- land partially enclosed by development, i.e. where new development would effectively be 'infill' development;
- land where development would be well contained by the landscape;
- land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and,
- a strong boundary could be created with a clear distinction between 'town' and 'country'.

149. The Planning Advisory Service has since updated their 'Plan Making Question and Answer' advice with regard to the assessment of Green Belt within Local Plans<sup>46</sup>. The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.

### Planning Inspectorate Local Plan Examination Reports

150. Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning and by association MOL planning<sup>47</sup>. These include:

- The Inspector's preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an *"up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes"*.
- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *"fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations"*, i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
  - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
  - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
  - Green Belt purposes 4 and 5 were not assessed.
  - The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels for a five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the needs for consistency and transparency: *"This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."*

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<sup>46</sup> <http://www.pas.gov.uk/pm-q-a-a-green-belt#Q:> When should you carry out a Green Belt review?

<sup>47</sup> Note: case references to the NPPF before July 2018 refer to policy within the original NPPF published in March 2012.

- With regard to the assessment of Purpose 4 the Inspector commented that *"the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant"*.
- With regard to the assessment of Purpose 5 which focused on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be *"consistent, transparent and proportionate."*
- 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.
- The Inspectors' 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 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 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process."*
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the Council has supplied insufficient justification to not allocate sufficient housing development proposals in the Local Plan. The Council's primary source of justification was the Council's Green Belt review. Then 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 and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, which *"should only be concerned about the absence of built development and other dominant urban influences"*. In addition, the inspector noted that if the quantum of development required can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.
- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The inspector concluded that this reasoning was *"flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites"*.

### High Court and Court of Appeal Judgements

151. Since the adoption of the National Planning Policy Framework in March 2012, there have been several important planning appeal decisions that have informed general interpretation of national Green Belt policy<sup>48</sup>. These include:

- *Heath & Hampstead Society v Camden LBC & Vlachos (2008)* concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The inspector concluded that *"while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green"*

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<sup>48</sup> Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

*Belt and Metropolitan Open Land*". Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement was cited in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.

- *Calverton Parish Council v Greater Nottingham Councils & others* (2015) indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent':

*"the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."*

- *Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited* (2015) clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in paragraphs 89 and 90 of the NPPF.
- *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' includes preservation of that quality of openness. The preservation of 'the setting ... of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."*
  - *"The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there."*
- *Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd* (2016) found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 89 of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- *Samuel Smith Old Brewery (Tadcaster) and Oxtou 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 NPPF states that "*mineral extraction*" is not "*inappropriate development*" in the Green Belt, 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.

## Adopted Waltham Forest Local Plan

152. The Waltham Forest Local Plan Core Strategy was adopted in 2012<sup>49</sup>, does not repeat the national or regional policy on Green Belts and MOL. Rather it provides local emphasis through Policies CS1 and CS5.

153. Policy CS1 on 'Location and Management of Growth', indicates that growth will be distributed and managed by (amongst other things):

*'E) accommodating growth on previously developed land by:*

*i) using land more efficiently;*

*ii) protecting designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar sites, Conservation Areas and Listed Buildings);'*

154. Policy CS5 on 'Enhancing Green Infrastructure and Biodiversity' indicates that the Council will endeavour to protect and enhance green infrastructure and biodiversity and to maximise access to open spaces across the Borough by:

*'A) protecting Green Belt and Metropolitan Open Land (MOL) and improving access where appropriate. Development and regeneration activity should be delivered principally through the use of brownfield land and buildings.'*

155. The Core Strategy therefore reinforces the emphasis given in national and regional policy to the importance of Green Belt and MOL in contributing to the conservation, enhancement and positive use of green space.

## New Draft Waltham Forest Local Plan

156. In July 2019 the Borough published a full draft of its new Local Plan for public consultation<sup>50</sup>. Policy 84 (Green Infrastructure and the Natural Environment) states:

*"Proposals will be supported where they contribute to:*

*A. The preservation and enhancement of green and blue infrastructure and access to open spaces by:*

*i. Protecting Green Belt and Metropolitan Open Land (MOL)*

*B. Where development proposals are allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan, they should:*

*i. Implement a high standard of design in accordance with the principles set out in (design policies)*

*ii. Complement and improve the quality of existing open space uses and landscaping*

*iii. Enhance the green infrastructure network through better connectivity and the creation of new open spaces whilst also conserving their natural and historic value;*

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<sup>49</sup> Waltham Forest Local Plan Core Strategy, 2012 [online] available at: <http://static.walthamforest.gov.uk/sp/documents/adopted-core-strategy.pdf>

<sup>50</sup> Shaping the Borough - Waltham Forest Draft Local Plan, 2019 [online] available at: [https://walthamforest.gov.uk/sites/default/files/Final%20draft%20Local%20Plan\\_small%20version-compressed%20%282%29.pdf](https://walthamforest.gov.uk/sites/default/files/Final%20draft%20Local%20Plan_small%20version-compressed%20%282%29.pdf)

- iv. *Establish and/or extend the Borough's Greenways, Green Corridors and provide landscaping along transport routes where possible; and*
- v. *New development adjacent to existing Green Chains and Green Corridors must be designed in a way that contributes towards the green infrastructure network."*

157. In addition Policy 22 (North Circular Corridor Strategic Location) states that:

*"Development in the North Circular Corridor Strategic Location over the Plan period will...Review the integrity of the Green Belt boundaries along the corridor with a view to de-designating brownfield land subject to the conclusions of an updated Green Belt Review."*

158. This policy represents the principle policy driver for this focussed Green Belt and MOL assessment.

## Neighbouring Authority Green Belt and MOL Reviews

### Epping Forest District

159. The Epping Forest Green Belt was reviewed in two stages. 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.
160. 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 Waltham Forest.
161. Stage 2 assessment parcels were defined to the west of the King George's Reservoir north of Gilwell Hill 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.
162. The study defined Greater London as the 'large built-up area' in relation to the assessment of contribution to Green Belt Purpose 1. The neighbouring settlements of Loughton (merged with Debden) and Waltham Abbey were defined as 'neighbouring towns' in relation to the assessment of Green Belt Purpose 2. In addition, Waltham Abbey was acknowledged to be a 'historic town' as part of the assessment of Green Belt Purpose 4. Historic towns were defined in accordance with Essex County Council's Historic Towns Assessment Reports. All Green Belt land within Epping Forest was considered to contribute equally to Green Belt Purpose 5 due to the fact that it was considered not possible to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore the parcels have not been individually assessed against Purpose 5.<sup>51</sup>
163. The District does not contain any MOL.

### London Borough of Enfield

164. The London Borough of Enfield completed a study of Green Belt land within the Borough in 2017 as part of the evidence base for their new Local Plan. The study was carried out in two stages. Stage 1 represents a strategic analysis of the Green Belt in Enfield, identifying areas of Green Belt considered to make a strong contribution to the Green Belt purposes. Stage 2 provides a more detailed assessment of the Green Belt within the Borough drawing out variations in the contribution of the Borough's Green Belt land against the Green Belt purposes. In 2018 the Council decided to revisit the study to take account of the updated National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPPG), as well as relevant case law. The Council also wanted the updated study to consider, at a finer grain, any variations in performance of the Green Belt. The updated has yet to be published.

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<sup>51</sup> Epping Forest District Green Belt Studies Stages 1 and 2 [online] available at: <http://www.efdclocalplan.org/local-plan/evidence-base/>

165. The London Borough of Enfield undertook a Metropolitan Open Land and Green Chain Associated Open Space Review in 2013<sup>52</sup>.

### London Borough of Hackney

166. The London Borough of Hackney does not contain any Green Belt land, but it does contain MOL. However, a review of the Borough's MOL has not been undertaken in recent years. The Borough's adopted Local Plan does not contain a policy on MOL.

### London Borough of Haringey

167. 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<sup>53</sup> and Development Management DPD protect Green Belt and MOL.

168. Strategic Policy SP13 requires new development to protect and enhance Haringey's parks and open spaces. All new development must "*protect and enhance and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development.*"

### London Borough of Newham

169. The London Borough of Newham contains both Green Belt land and MOL, although the area of Green Belt land is limited to the south eastern tip of Wanstead Flats east of Forest Drive and the City of London Cemetery and Crematorium. Again, a review of the designations has not been undertaken in recent years.

170. The Borough's adopted Local Plan does not contain policies on Green Belt or MOL.

### London Borough of Redbridge

171. The London Borough of Redbridge contains both Green Belt and MOL. A Green Belt study<sup>54</sup> was undertaken to inform the preparation of the Borough's adopted Local Plan in 2010 and subsequently updated in to consider specific site options for release from the Green Belt in 2013 and 2015. Two parcels of Redbridge's Green Belt are contiguous with Green Belt land within Waltham Forest:

- Wanstead Flats (GB parcel 01).
- Land containing and surrounding Snaresbrook Crown Court (GB parcel 03).

172. The study does not clearly define the key policy terms used to assess the Green Belt lands contribution to the Green Belt purposes; however, in both locations, the study recommended that the Green Belt be retained.

173. The Borough has not undertaken an assessment of MOL in recent years.

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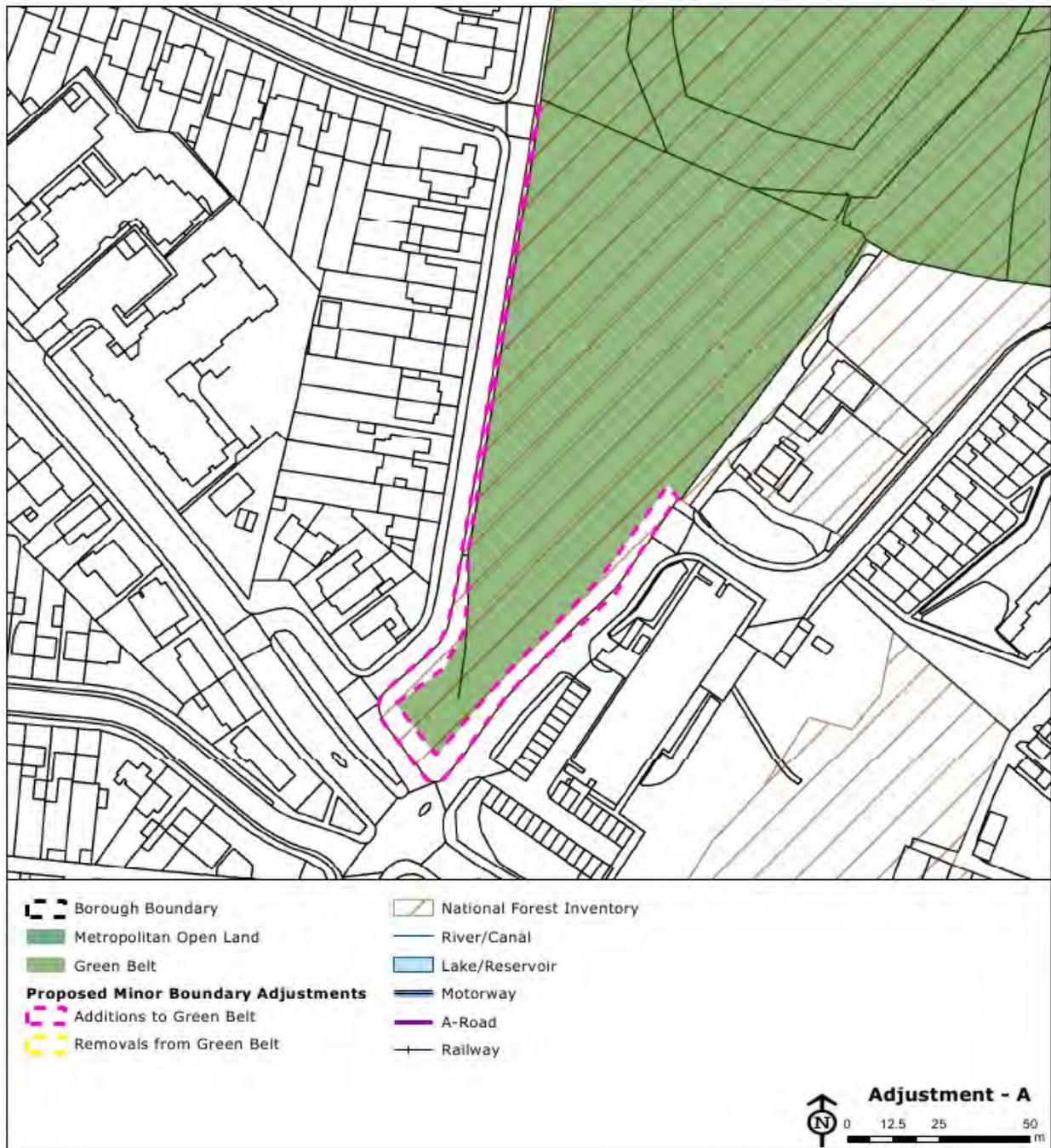
<sup>52</sup> London Borough of Enfield 2013, Enfield's Local Plan Evidence Base, Metropolitan Open Land & Green Chains Review [online] available at: [http://camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3681698&](http://camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3681698&)

<sup>53</sup> London Borough of Haringey 2013, Haringey's Local Plan Strategic Policies [online] available at: [http://www.haringey.gov.uk/sites/haringeygovuk/files/final\\_haringey\\_local\\_plan\\_2017\\_online.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/final_haringey_local_plan_2017_online.pdf)

<sup>54</sup> London Borough Redbridge Green Belt Review, January 2016 [online] available at: <https://www.redbridge.gov.uk/planning-and-building/planning-policy/local-plan/local-plan-archive/>

# Appendix 3 - Recommended Minor Boundary Adjustments

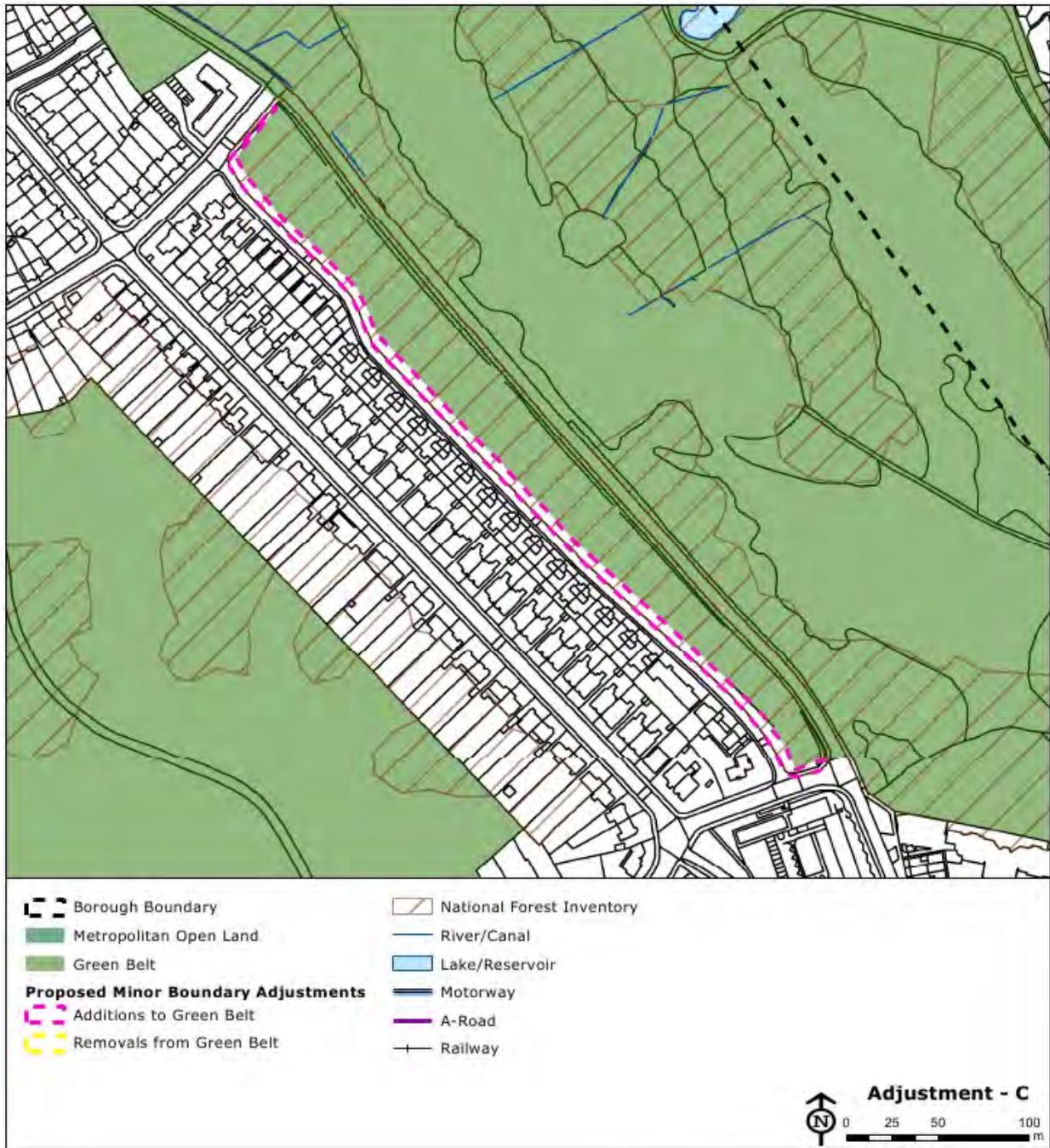
## Green Belt Boundary Adjustments



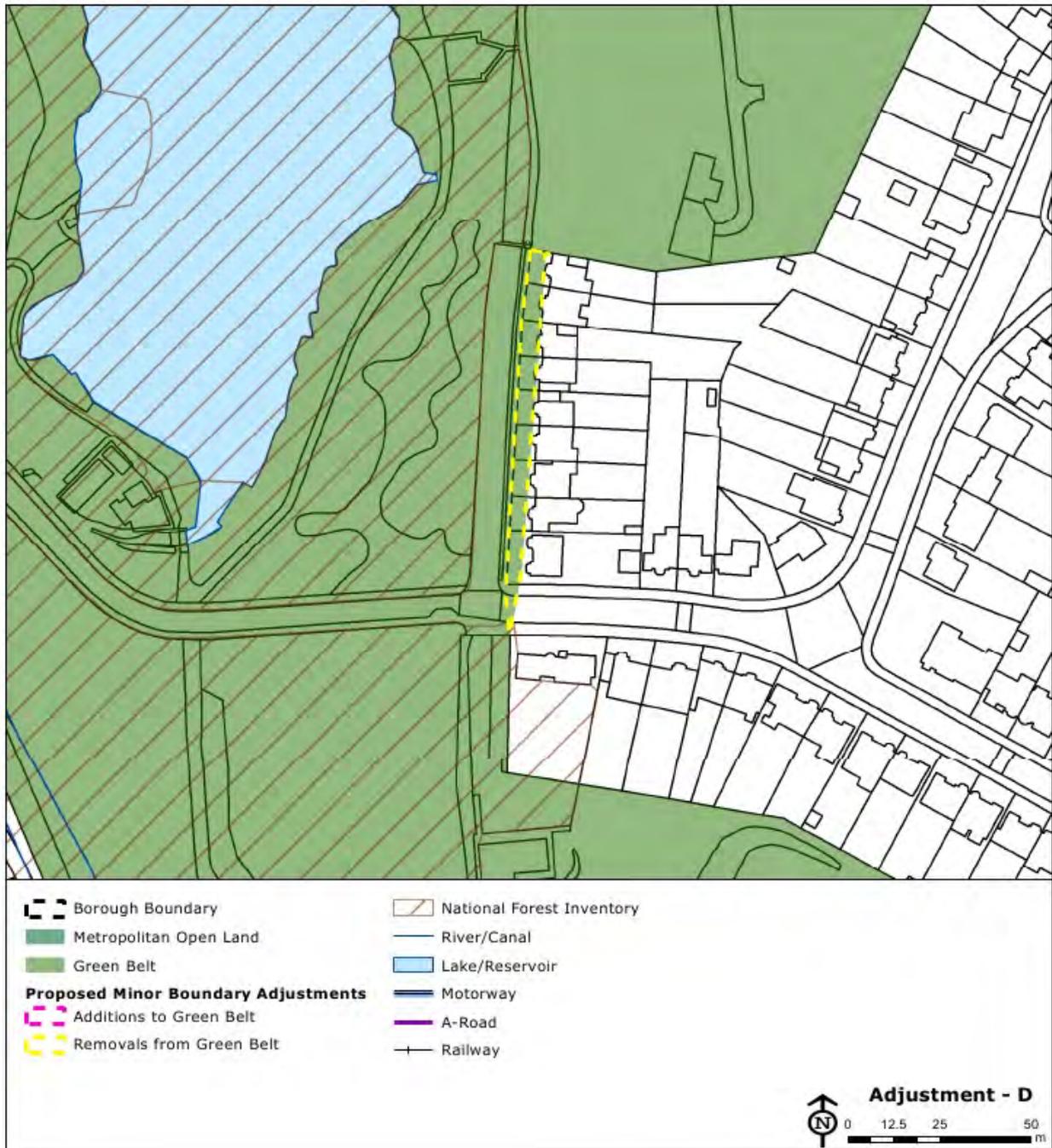
**It is recommended that Green Belt be extended to follow the edge of the woodland adjacent to Holly Drive, Hawksmouth and Kings Head Hill.**



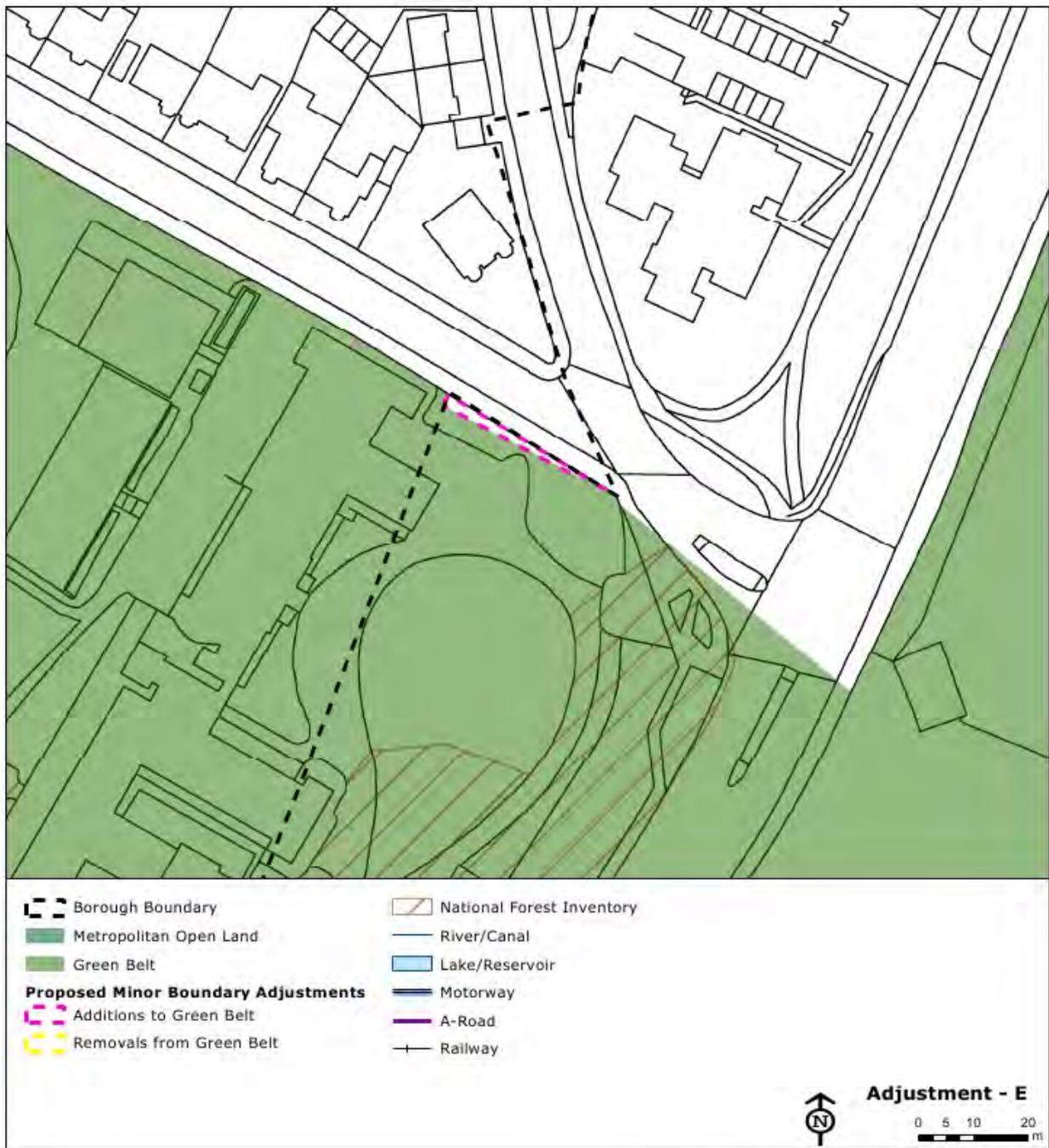
**It is recommended that Green Belt be extended to consistently follow the watercourse to the north and include the small portion of scrubland to the north west of the watercourse to the east of Friday Hill. In addition, it is recommended the Green Belt be removed so as not to cover the southern portion of the A1009.**



**It is recommended that Green Belt be extended to include all the woodland up to the edge of Wood Lane.**



**It is recommended that Green Belt be removed to follow the edge of Tamworth Avenue and not the front gardens of the dwellings along its eastern side.**

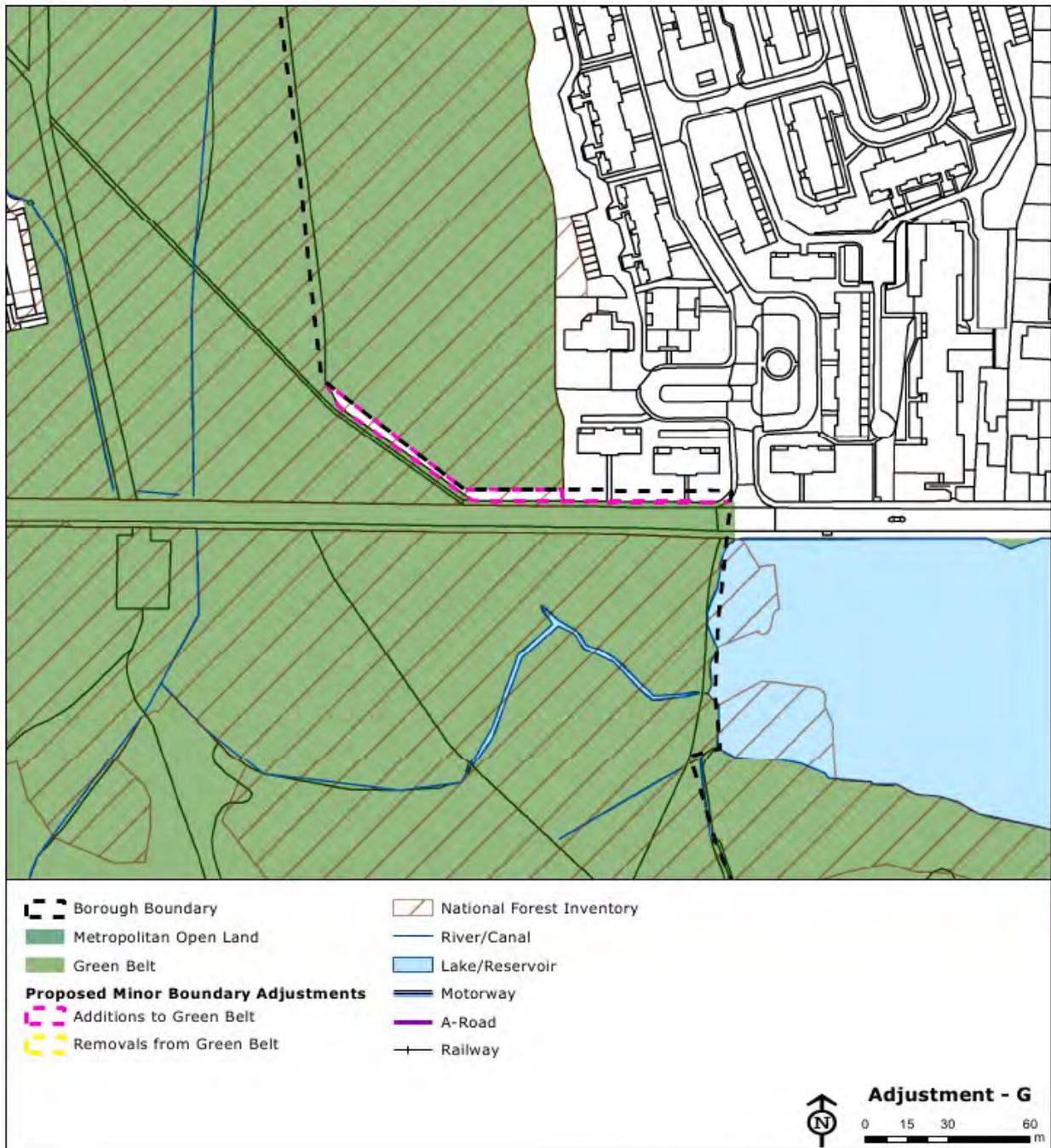


**It is recommended that Green Belt be extended to consistently follow the southern edge of The Charter Road.**

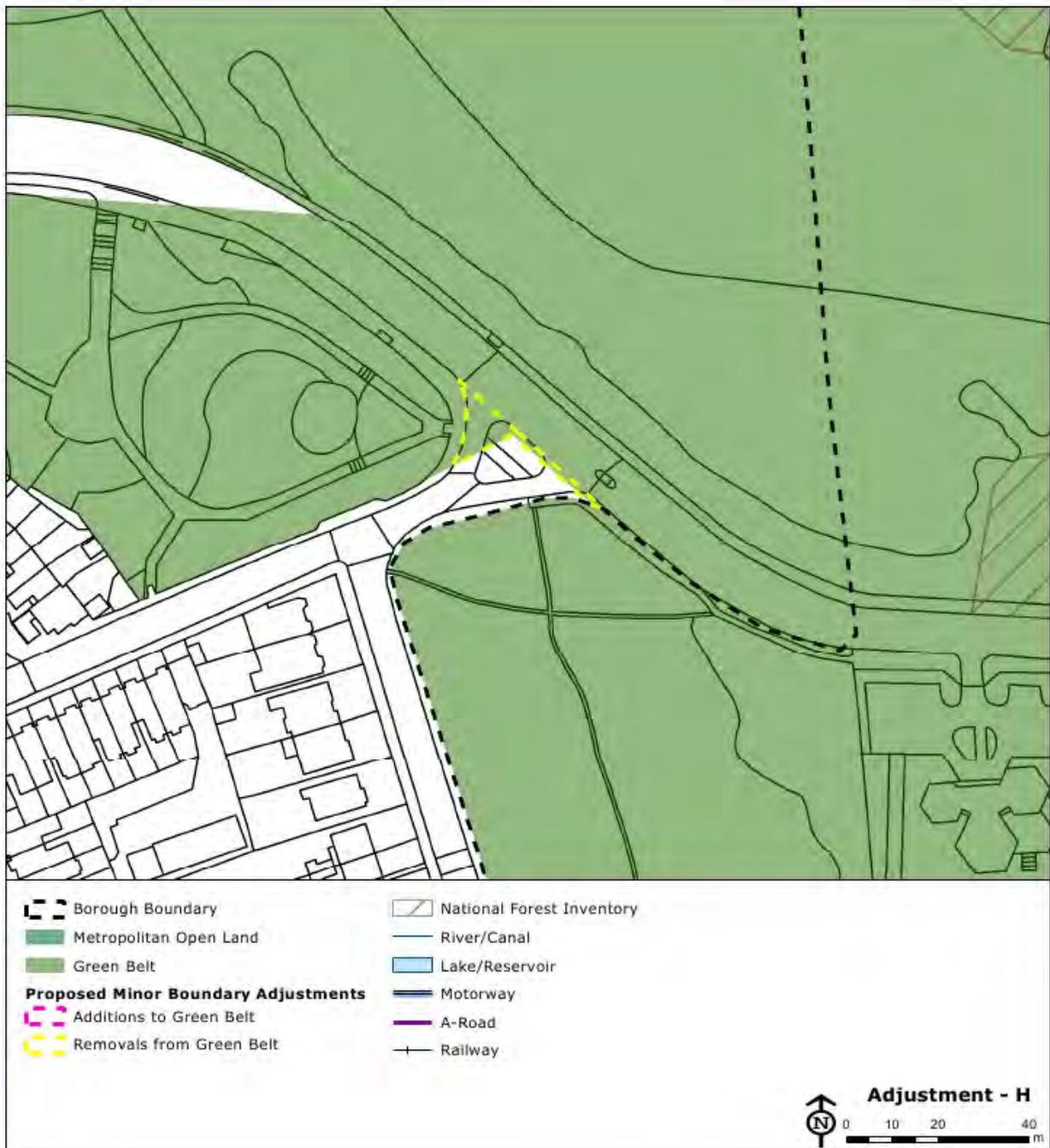


It is recommended that Green Belt be extended to include all the woodland up to the eastern edge of Beacontree Road.

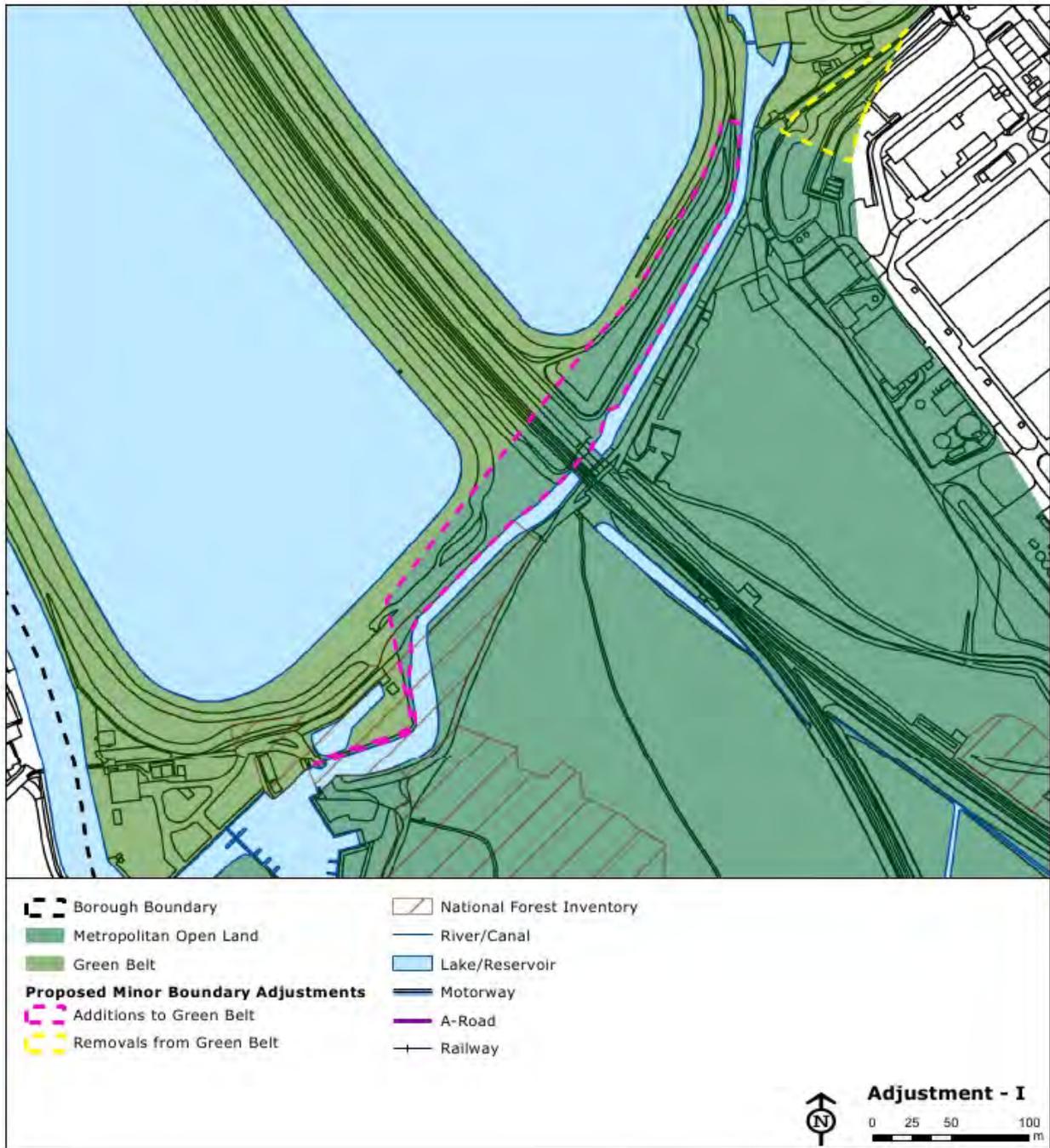
It is



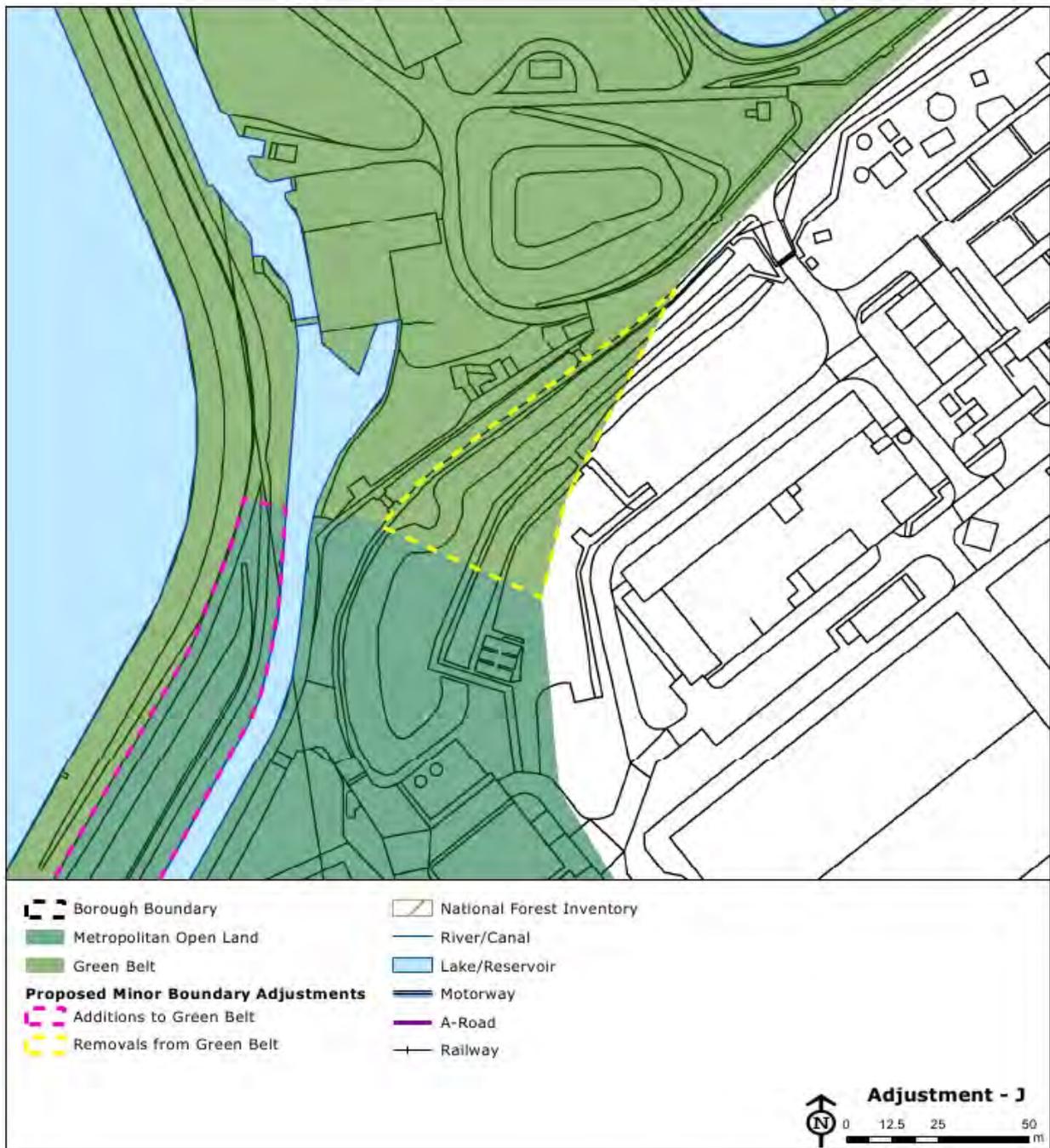
recommended that Green Belt be extended to consistently follow the northern edge of Snaresbrook Road.



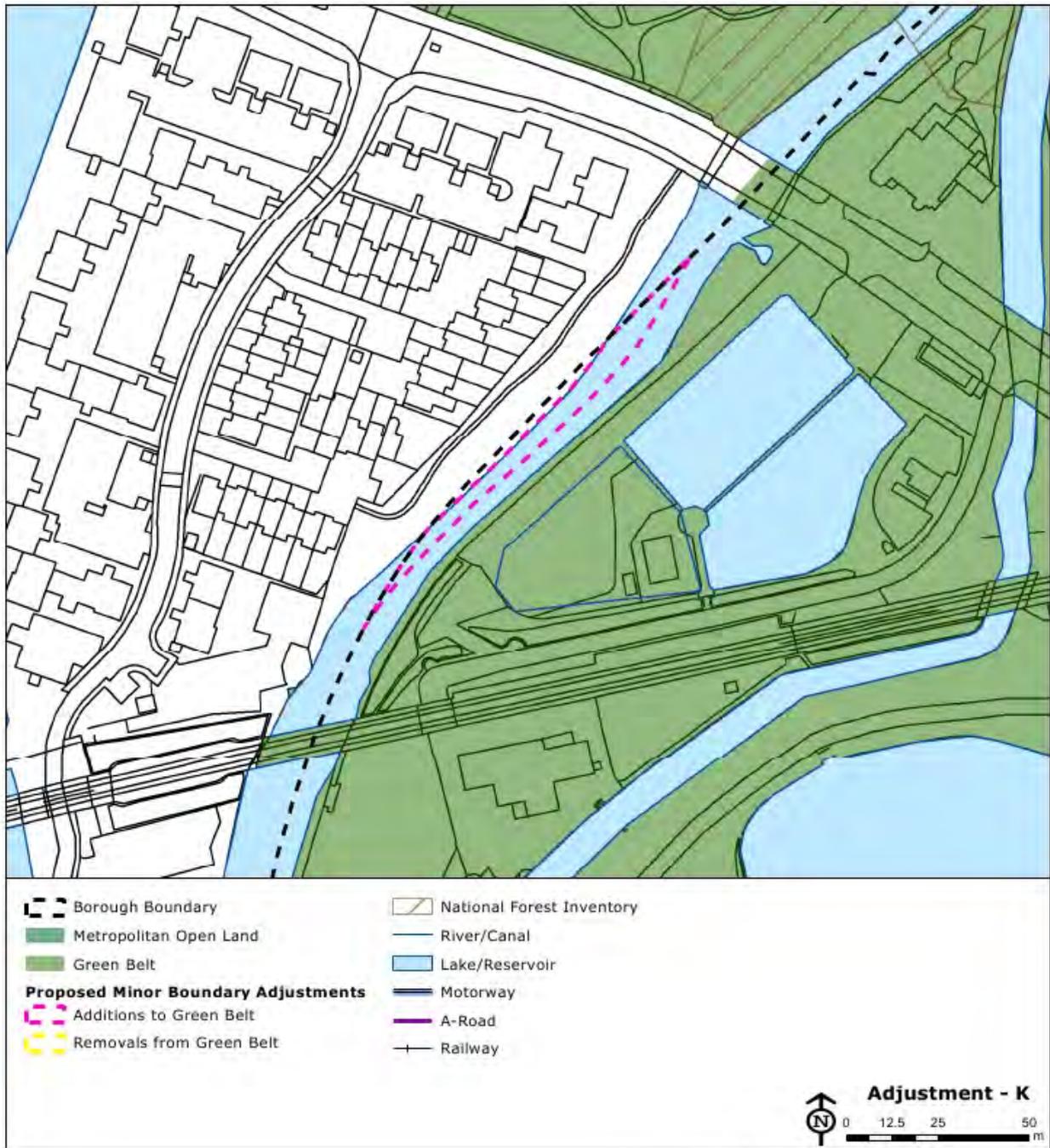
**It is recommended that Green Belt be removed not to include the northern half of the junction of Browning Road and Bush Road, making the boundary consistent across the junction.**



**It is recommended that Green Belt be extended to consistently follow the Coppermill watercourse.**



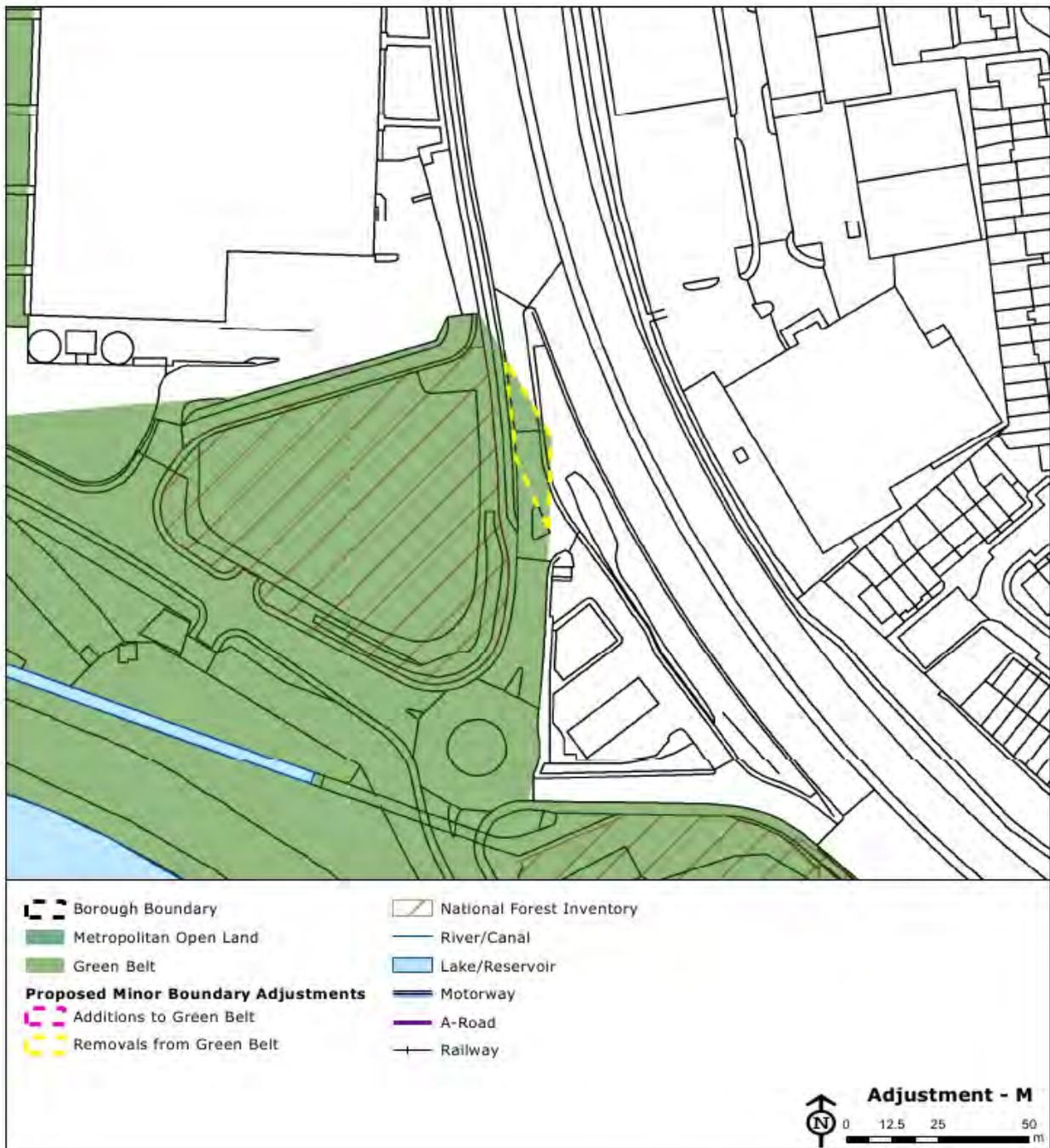
**It is recommended that Green Belt be removed not to include the land within the developed Coppermill filter beds site instead following the northern boundary of Coppermill Lane.**



**It is recommended that Green Belt be extended to consistently follow the course of the River Lee and the Borough boundary.**

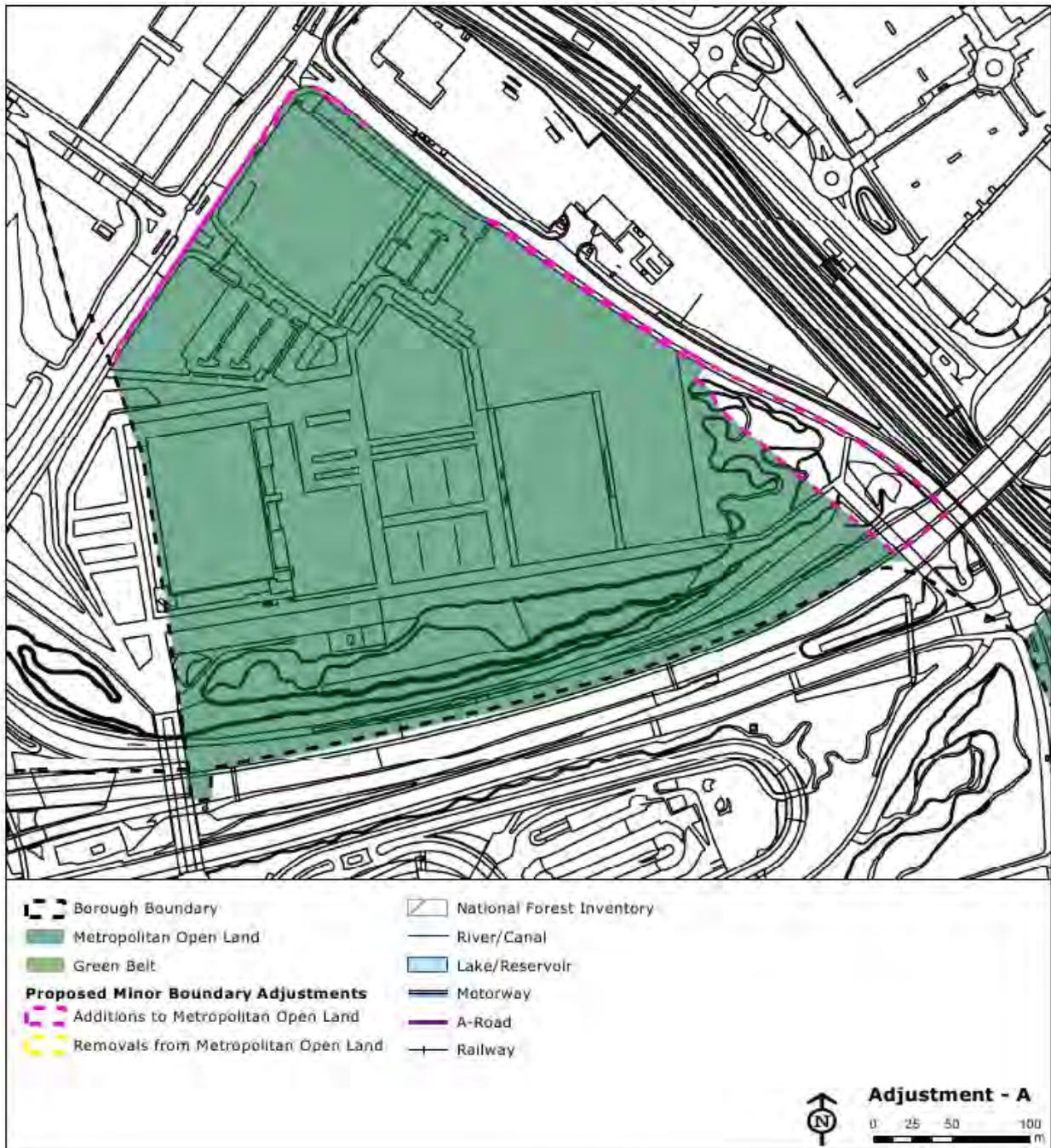


It is recommended that Green Belt be extended / removed to follow the existing edge of development along the northern edge of the redeveloped Kimberley Trading Estate and the dwellings along Cheney Row.

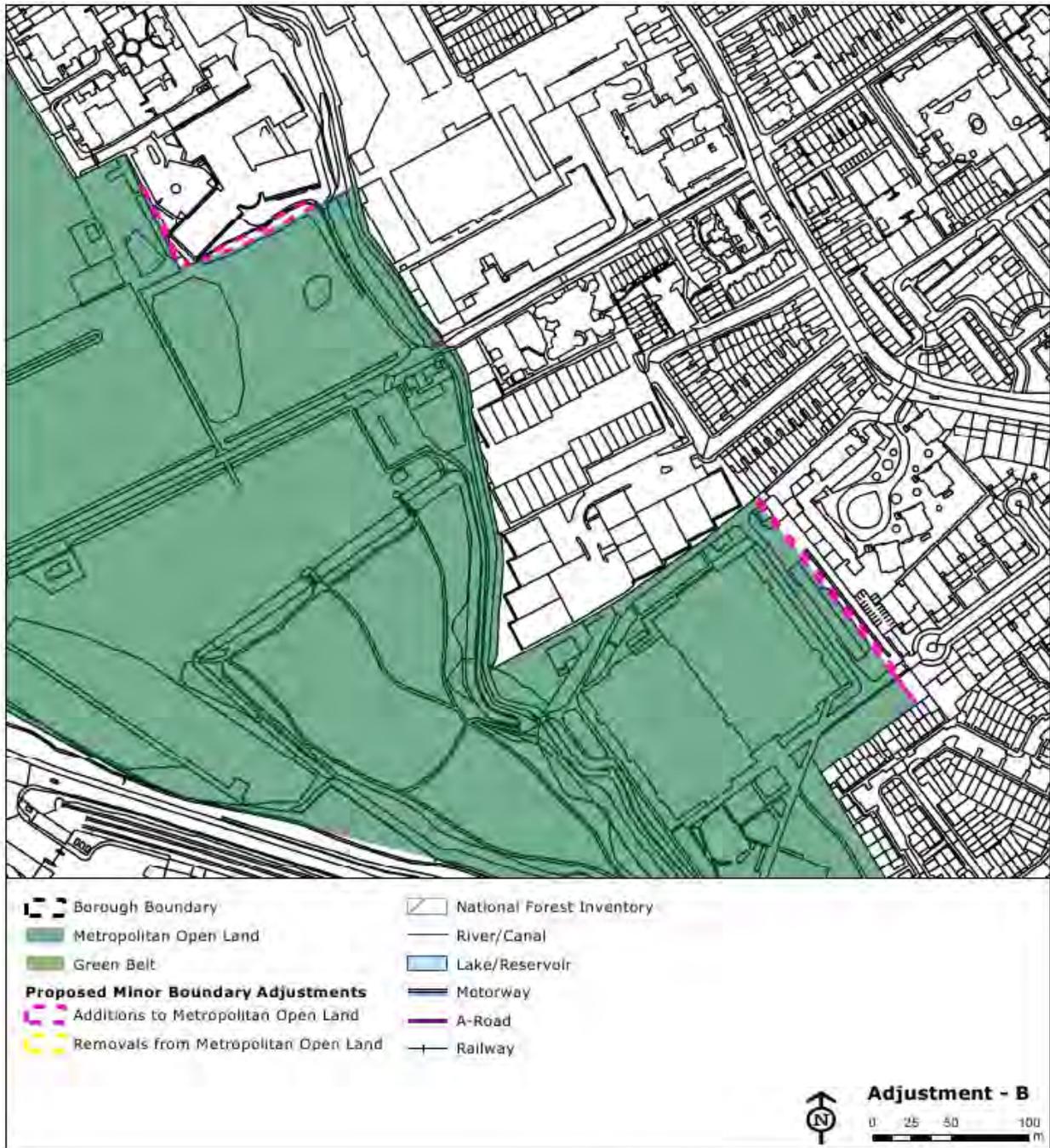


**It is recommended that Green Belt be removed where it extends into the junction of Folly Lane and Walthamstow Avenue so as to more appropriately follow the line of development directly to the south.**

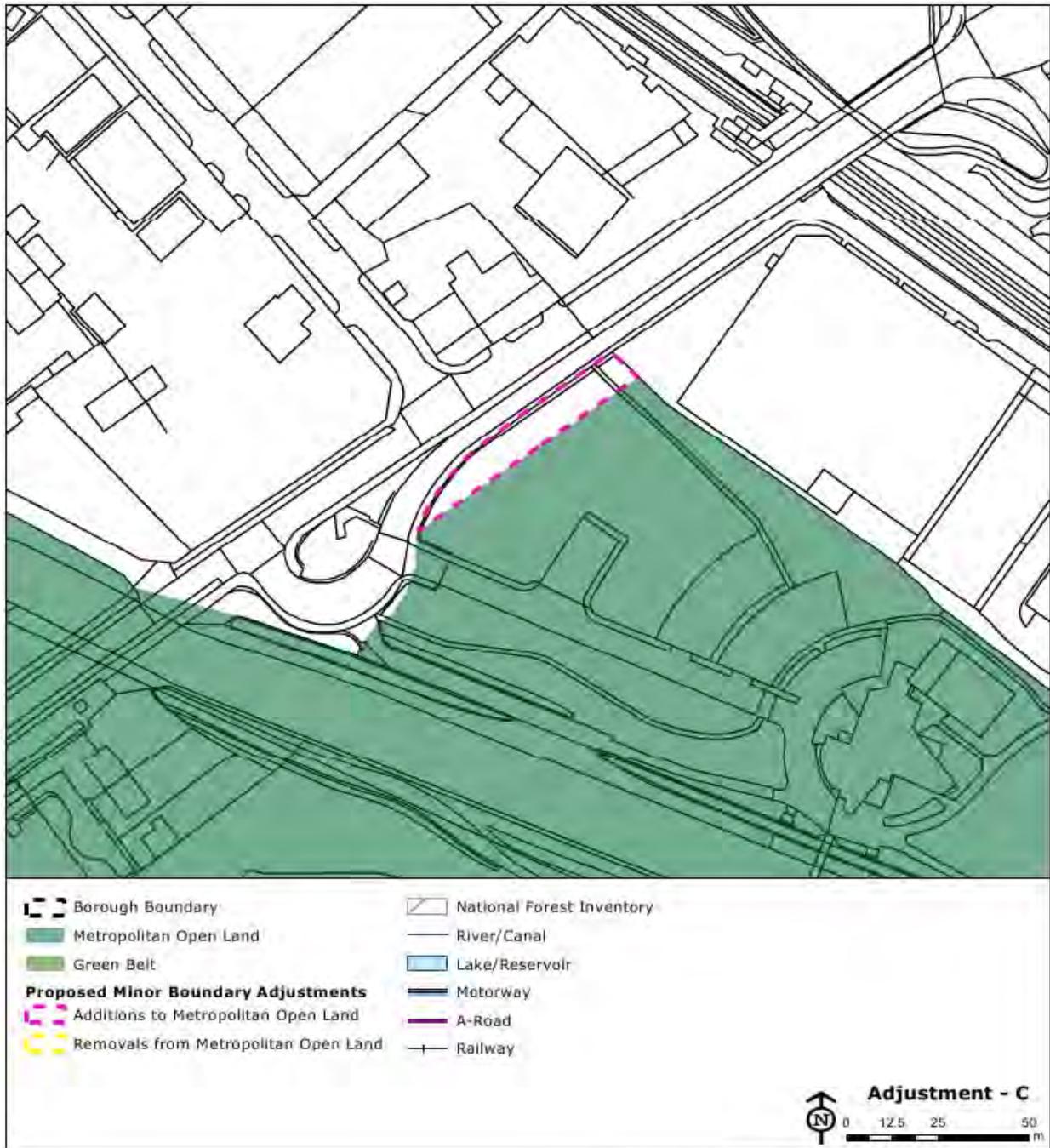
## MOL Boundary Adjustments



**It is recommended that MOL be extended to include the land up to the edge of Temple Mills Lane and Eastway.**



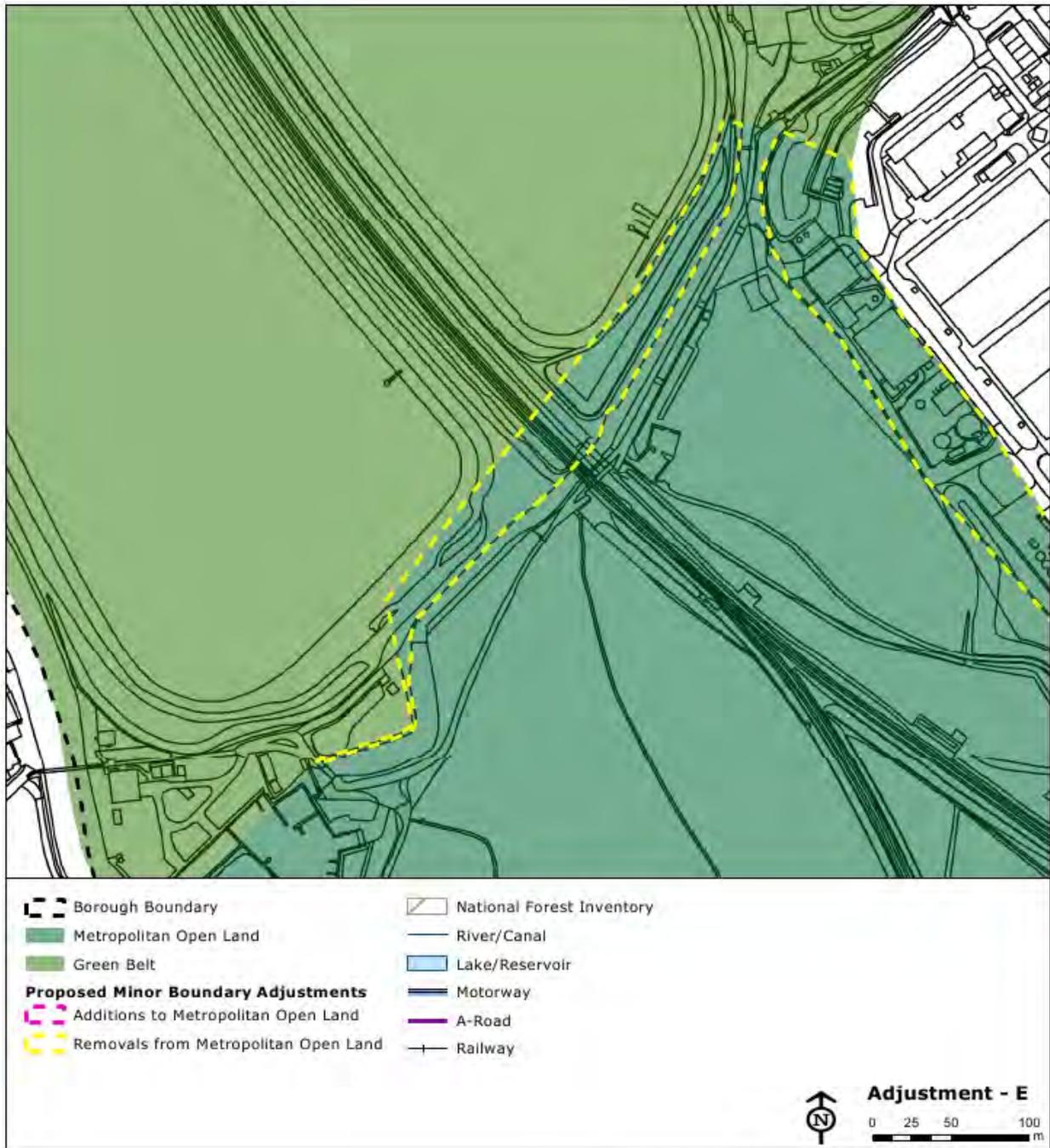
It is recommended that MOL be extended to include the trees that mark the urban edge to the east.



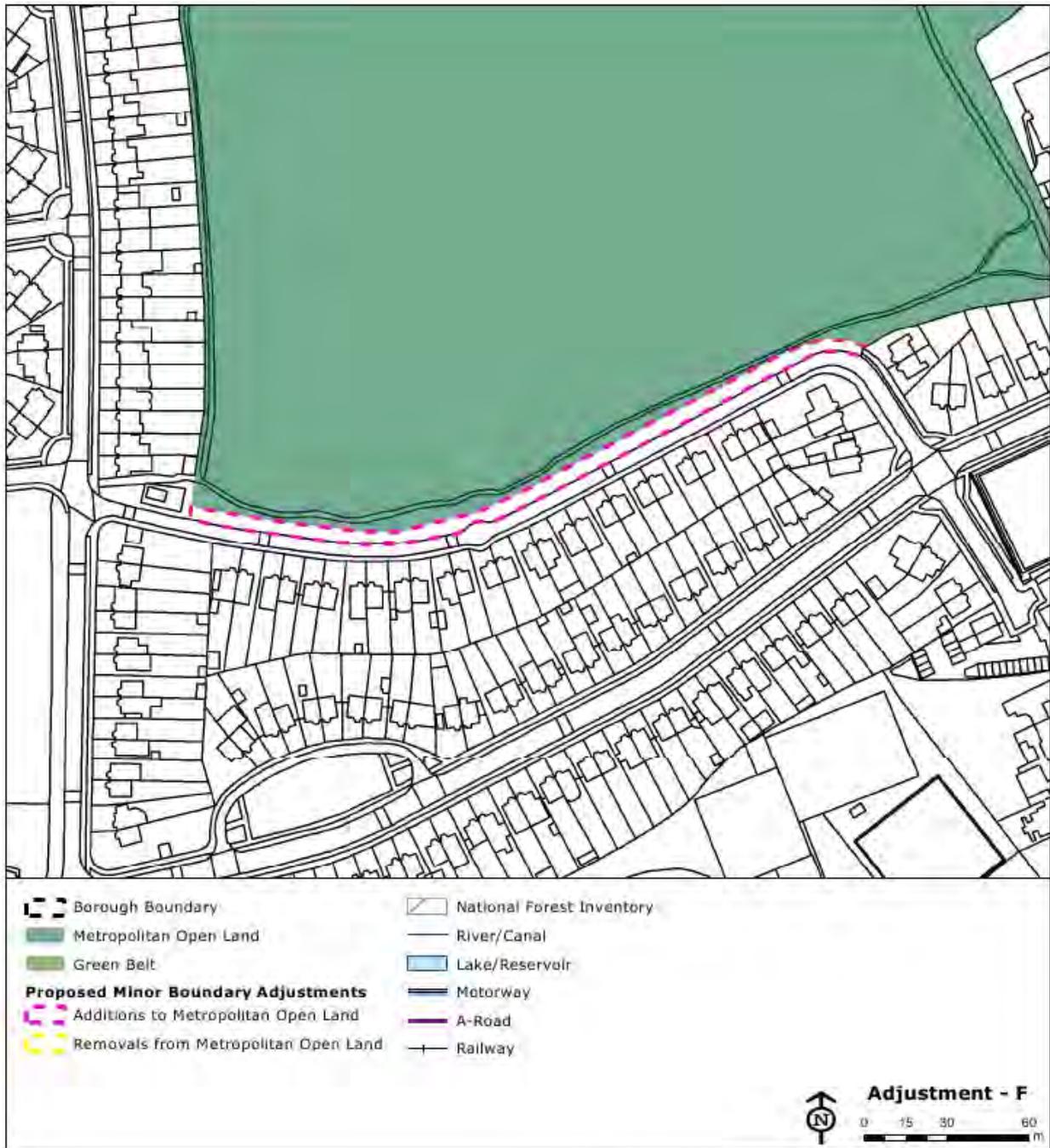
**It is recommended that MOL be extended to include the grass up to the edge of pavement at the southern boundary of Lea Bridge Road.**



It is recommended that MOL be removed not to include the land within the developed Coppermill filter beds site instead following the western edge of the site.



It is recommended that MOL be removed to follow the Coppermill watercourse.



It is recommended that MOL be extended up to the northern edge of Inks Green.