London Borough of Waltham Forest

Green Belt and Metropolitan Open Land Review

December 2015
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.

Five years on, relevant national planning policy and guidance has changed and such studies benefit from a wide array of new case law and Planning Inspectorate Local Plan Examination Reports. Due to the fact that the methodology and findings reported in the 2015 study are not up-to-date, the findings of the 2015 study have not been used to inform the Borough’s preferred plans for the location and management of growth within the Borough over the next Local Plan period (2020-2035).¹

A focussed Green Belt and MOL assessment has since been commissioned to consider the three locations within the Borough's Green Belt and MOL identified by the Council. The study assesses the harm of permitting development in these locations to the designations, in order to help the Council make development management decisions as to whether the necessary 'very special circumstances' have been set out in each location.

Should the Council decide to make alterations to Green Belt and MOL boundaries through the Local Plan-making process it is recommended that an updated Green Belt and MOL study is commissioned drawing 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. In setting out the necessary 'exceptional circumstances' for making alterations to the designations’ boundaries consideration should be given to 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.'

LUC

November 2019

¹ The Borough's Draft Local Plan (Policy 3) and supporting evidence – available at: https://walthamforest.gov.uk/content/local-plan
1 Introduction

Purpose of the review

1.1 LUC was appointed by the London Borough of Waltham Forest (LBWF) to review the Borough’s Green Belt and Metropolitan Open Land (MOL). A Steering Group oversaw the review.

1.2 The review assesses whether the Borough’s existing Green Belt and MOL meet the purposes of these designations, as set out in the National Planning Policy Framework (NPPF, 2012) and the London Plan (2011). A detailed commentary is provided on the assessment of each parcel of land. The review also makes recommendations on the potential to remove land from, or include land within, the designated areas, provided that the Borough can demonstrate the ‘exceptional circumstances’ required for such changes. It also makes recommendations on specific Green Belt or MOL sites where there are opportunities for enhancement. The review will inform the Borough’s emerging Local Plan, complementing separate studies on housing capacity, employment land, infrastructure needs and retail needs.

1.3 The review does not identify land for removal from Green Belt or MOL; its role is not to find the necessary exceptional circumstances for alterations to these designations, but to provide evidence on the relative performance of land parcels against the Green Belt purposes and MOL criteria. Should the Borough conclude that there are exceptional circumstances for making alterations to the existing Green Belt and MOL boundaries, these changes, including any allocations of land for development, will be taken forward through the Local Plan process.

This report

1.4 This report sets out the context for the review, in terms of the national and London policy context, the evolution and character of Green Belt and MOL within the Borough, and the wider green infrastructure policy context. It then describes the method for undertaking the review and identifies the parcels of land assessed. Finally, the report sets out the findings of the review and makes recommendations on the next steps.

Meeting the Duty to Cooperate

1.5 Paragraph 156 of the NPPF (2012) sets out the strategic issues where co-operation between local authorities might be appropriate, and includes a number of cross boundary issues that are closely linked to Green Belt. The LBWF therefore engaged with its ‘duty to co-operate partners’ (as identified in the Borough’s Statement of Community Involvement) in agreeing the methodology for the review.

Section 110 of the Localism Act (2011) describes English Local Authorities’ ‘duty to co-operate’. The duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas.
- Requires that councils and public bodies ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies to address such issues.
- Requires councils to consider joint approaches to plan making.
2 Context

Evolution of Waltham Forest’s Green Belt and MOL

Green Belt

2.1 The principle of maintaining a ring of open country around London can be traced back to the 16th 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.

2.2 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’.

2.3 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 Epping Forest and Kenley Common.

2.4 In 1935 the London County Council put forward a scheme “to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable’. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.

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

2.6 The Greater London Development Plan, approved in 1976, defined the full extent of the 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’.

2.7 The total area of the London Green Belt is currently around 514,495ha, of which 35,225 ha (6.8%) lies within Greater London. Nineteen of the 32 London boroughs have Green Belt. With around 840ha of Green Belt in Waltham Forest, this represents around 2.4% of the Green Belt in Greater London and 0.16% of the total London Green Belt.

Metropolitan Open Land

2.8 In comparison with Green Belt, MOL is a relatively recent planning designation, having been introduced in the 1976 Greater London Development Plan. Its origins however can be found in the Public Open Space designation in the preceding Greater London Plan and the Initial Development Plans.

2.9 The Greater London Development Plan 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. 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 indicated that they should be safeguarded for predominantly open uses, as much as Green Belt. As noted, above, the London Plan (2011) broadly follows this approach.
2.10 The current extent of MOL within Waltham Forest is thought to have originated in the Greater London Development Plan and it has not been subject to review since then. MOL in Waltham Forest is unusual, insofar as the main area of MOL is contiguous with Green Belt.

National and London-wide Green Belt policy

2.11 The NPPF (2012) takes forward the previous national Green Belt policy set out in PPG2 (Green Belts). Paragraph 79 states that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’.

2.12 This is elaborated in NPPF (2012) paragraph 80, which states that Green Belts should serve five purposes, as set out in Box 1 below:

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

2.13 The NPPF (2012) emphasises in paragraph 83 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 in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period’. The need for housing or employment land can be an exceptional circumstance to justify a review of Green Belt boundaries.

2.14 Paragraph 84 of the NPPF (2012) indicates that ‘when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling 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’.

2.15 National Planning Policy Guidance (NPPG, 2014) on Green Belt says that, once a local planning authority has established its objectively assessed housing need, a Strategic Housing Land Availability Assessment should be prepared that takes "account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”.

2.16 Paragraph 85 of the NPPF (2012) 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. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.

2.17 Paragraph 82 of the NPPF (2012) indicates that, if proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;

---

3 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.
• 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.

2.18 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 (2012) 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 81).

2.19 This positive role of the Green Belt is also reflected in the London Plan, 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' (Paragraph 7.55).

2.20 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.

Waltham Forest policy

2.21 The Waltham Forest Local Plan Core Strategy, which was adopted March 2012, does not repeat the national or regional policy on Green Belts. Rather it provides local emphasis through Policies CS1 and CS5.

2.22 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);’

2.23 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.’

2.24 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.

Metropolitan Open Land

2.25 As noted above, the criteria for designation of MOL are concerned more with the functions of the land, rather than its location. These are set out in the London Plan (2011) and listed in Box 2 below. The overriding purpose of MOL policy is to protect strategic open land (of more than Borough importance) within the urban area that contributes to the structure of London.
Box 2: Criteria for MOL designation

- land that contributes to the physical structure of London by being clearly distinguishable from the built-up area
- land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London
- land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level
- land that forms part of a Green Chain and meets one of the above criteria.

2.26 MOL is afforded the same level of protection as Green Belt, with the London Plan (2011) noting that incompatible development should be refused except in very special circumstances. The general extent of the boundary is supported by the Mayor and as with Green Belt, the London Plan (2011) indicates that MOL has an important role to play as part of London’s multifunctional green infrastructure (para. 7.56). The positive role of MOL is more explicit in the criteria for designation, so this will be reflected in the assessment.

2.27 The Waltham Forest Local Plan Core Strategy policy on MOL is referred to above. The policies do not differentiate significantly between Green Belt and MOL: both are seen by the Borough as playing a key role in guiding the location of growth and in enhancing green infrastructure and biodiversity.

The extent and character of Green Belt and MOL within Waltham Forest

2.28 The current extent of Green Belt and MOL in Waltham Forest and adjacent authorities is shown in Figure 1. Around 22% of the Borough is designated Green Belt and around 5.5% is designated MOL. The Green Belt is characterised by two ‘fingers’ of open land extending into the eastern and western sides of the Borough from the main body of Green Belt to the north.

Green Belt and MOL to the west

2.29 On the Borough’s western side, where the narrow finger of Green Belt also extends into the London Boroughs of Enfield and Haringey, the landscape is dominated by the reservoirs alongside the River Lea. The ‘Walthamstow Reservoirs’ extend across some 200 hectares including more than 120 hectares of water bodies, owned and operated by Thames Water. The reservoirs are of national and international importance to breeding, migratory and wintering water birds. They form part of a Site of Special Scientific Interest (SSSI) designated for the wide variety of fish, birds and waterfowl they support, including the largest heronry in London. They also form part of a larger Site of Metropolitan Importance for Nature Conservation, for the mixture of aquatic and terrestrial habitats they provide, and for their London-wide importance (especially for birds).

2.30 The Reservoirs are also a designated Special Protection Area (SPA) under the EU Birds Directive due to their importance for the wintering ducks Gadwall and Shoveler. They are also a Ramsar site (The Ramsar Convention on Wetlands of International Importance).

2.31 There is a current project, known as ‘Walthamstow Wetlands’, that is seeking to open up much of the Walthamstow reservoirs area to public access, including the provision of visitor facilities.
Figure 1
Study Context

Source: CPRE

Study Boundary
Local Planning Authority Boundary
Green Belt
Metropolitan Open Land
2.32 The Borough’s main area of MOL is also in the west of the Borough; it is contiguous with the Green Belt to the south. Part of the designated land also extends across to the London Borough of Hackney. The MOL in this area is mainly given over to parks and recreation areas, including the Lea Valley Ice Centre which is a significant building. It also comprises a site owned by Thames Water which is used for storage of vehicles, construction machinery and materials.

2.33 Larks Wood and Larkswood playing fields, which form a significant area of open space in the centre of the Borough, is the only other designated areas of MOL within the Borough.

**Green Belt to the east**

2.34 In contrast to the Green Belt and MOL in the west of the Borough, the Green Belt to the north and east can be characterised as ‘remnant countryside’, forming part of Epping Forest – after which the Borough takes its name. The vast majority of the Green Belt is also designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).
3 Methodology

3.1 The methodology used to assess the Green Belt drew on good practice across England and on LUC’s experience elsewhere. The assessment criteria are based on national planning policy. Similarly, the methodology for assessing MOL is based on good practice in London and is focussed wholly around the criteria for MOL designation as defined in the London Plan (2011).

3.2 Following the contextual analysis set out in Section 2, the methodology involved four main tasks, as described below.

Task 1: Identifying Green Belt and MOL ‘parcels’ for review

3.3 All of the Borough’s existing Green Belt and MOL was assessed, irrespective of whether the land is protected by other designations. Significant areas of undesignated open land were also assessed to determine whether they could qualify for Green Belt or MOL designation.

3.4 The land was divided into appropriate ‘parcels’ for assessment. The parcels are areas of land comprising the same or very similar land use or character, bordered by permanent and defensible boundaries on the ground (such as roads, railways, water courses or hedges (see also Task 2)). Using this approach, some parcels cut across Borough boundaries. However, only the areas that fall within the London Borough of Waltham Forest were assessed. Figure 2 shows the parcels of land that were assessed.

3.5 GIS maps were prepared showing environmental and planning designations, including Scheduled Ancient Monuments, functional floodplain, and international, national and local nature conservation designations. While these features and designations do not inform the assessment of parcels of Green Belt against the Green Belt purposes, they provide valuable planning context for the review and enable the results to be viewed alongside other planning considerations. These layers of information were particularly useful for informing the judgements associated with parcels assessed against the MOL criteria outlined in the London Plan (2011).
Figure 2
Parcels for Assessment

London Borough of Waltham Forest - Green Belt Review

Source: Waltham Forest London Borough Council, CPRE

Map Scale @ A4: 1:55,000
Task 2: Defining and consulting on the method

3.6 A method statement was produced in February 2015 setting out the context for the study, the proposed methodology for defining the parcels of Green Belt and MOL, and the criteria to be used in the assessment of the parcels.

3.7 In the interests of fulfilling LBWF’s ‘duty to co-operate’ the Steering Group consulted with the following neighbouring authorities and organisations on the method statement:
   - Environment Agency
   - English Heritage
   - Natural England
   - Mayor of London
   - Civil Aviation Authority
   - Clinical Commissioning Groups (formerly Primary Care Trusts)
   - Office of Rail Regulation
   - Transport for London
   - Marine Management Organisation
   - Neighbouring local authorities:
     - Epping Forest District Council
     - London Borough of Redbridge
     - London Borough of Hackney
     - London Borough of Newham
     - London Borough of Haringey
     - London Borough of Enfield
   - London Development Corporation
   - Local Nature Partnership
   - Local Enterprise Partnership
   - Lee Valley Regional Park

3.8 A two week consultation was undertaken between the 6th February 2015 and the 20th February 2015. Feedback received from consultees was reviewed and where appropriate taken on board.

Task 3: Assessing the Green Belt and MOL, including the need for boundary adjustments

Criteria for assessing Green Belt parcels

3.9 Table 3.1 sets out the Green Belt purposes, the issues for consideration and criteria used to review of each Green Belt or non-Green Belt parcel against each purpose. It then sets out the approach to ‘scoring’ against each criterion, together with some notes on the definition of terms and information used in the assessment. Appendix 1 contains the detailed assessment sheets for each parcel of Green Belt. The assessment sheets set out a detailed justification for each score. This ensures a high level of transparency and enables the assessment to be repeated at a future date.

3.10 The NPPF (2012) makes clear that all Green Belt purposes carry the same weight. In order to avoid the weighting of individual purposes each parcel has the opportunity to score the same
against all of the Green Belt purposes, i.e. between 0 and 4 for purposes 1–4. All parcels score 4 for purpose 5 for the reasons set out in Table 3.1.

\* Purposes 1 and 3 have two criteria; Purposes 2 and 4 have one criterion; all Purposes (1-5) have the potential to score 4.
Table 3.1: Green Belt review criteria

<table>
<thead>
<tr>
<th>NPPF (2012) Green Belt Purposes</th>
<th>Issues for consideration</th>
<th>Criteria</th>
<th>Score /Value</th>
<th>Assessment method notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 To check the unrestricted sprawl of large built-up areas.</td>
<td>a Ribbon development.</td>
<td>Does the parcel play a role in preventing ribbon development and/or has the Green Belt within the parcel already been compromised by ribbon development?</td>
<td>If strong role (parcel inhibiting development along two or more sides of a road corridor), 2  If some role (parcel inhibiting development along one side of a road corridor), 1  If no role (parcel not inhibiting development along a road corridor), 0</td>
<td>Ribbon development = linear development along route ways, such as roads, canals and railways.  Sprawl is the spread of urban areas into the neighbouring countryside – it includes the outward expansion of London into the neighbouring home Counties and the inward sprawling of urban areas into Green Belt areas within the ‘large built up area’.  Does the parcel adjoin a road corridor? Any road excluding very minor roads, e.g. green lanes, and roads that are part of the strategic road network (Motorways and major A roads) where direct access from a development to the road wouldn’t be possible.</td>
</tr>
<tr>
<td></td>
<td>b Openness.</td>
<td>Is the parcel free from development? Does the parcel have a sense of openness?</td>
<td>If and parcel contains no development and has a strong sense of openness, 2  If land parcel contains limited development and has a relatively strong sense of openness, 1  If land parcel already contains development compromising the sense of openness, 0</td>
<td>Development means any built structure.</td>
</tr>
<tr>
<td>2 To prevent neighbouring towns(^5) merging into one another.</td>
<td>a Location of parcel and distance between neighbouring settlements.</td>
<td>What is the width of the gap between the settlements?</td>
<td>If &lt;500m(^6), 4  If between 500m and 750m, 2  If more than 750m, 0</td>
<td>Merging = the joining or blurring of boundaries between two settlements.  Draw a straight line at the narrowest point between the settlements. The line must pass through the parcel being assessed.</td>
</tr>
<tr>
<td>3 To assist in safeguarding the countryside from encroachment.</td>
<td>a Significance of existing urbanising influences.(^7)</td>
<td>Does the parcel contain countryside? Has the parcel already been affected by encroachment of urbanised built development? (not including agricultural and</td>
<td>If land parcel contains countryside and no urbanising development, and is open, 2  If land parcel contains countryside and limited urbanising development, and Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.  Encroachment from urbanising influences= intrusion, gradual advance of buildings and urbanised land beyond an acceptable or established limit.  Urbanising influences include street...</td>
<td></td>
</tr>
</tbody>
</table>

---

\(^5\) Greater London comprises a number of identifiable towns (and villages) within the overall urban area. Many of these towns have merged into one continuous conurbation; however, the London Green Belt at the edge of Greater London and either side of the corridors of Green Belt into the City, play a role in separating many of these towns. Towns within and neighbouring the London Borough of Waltham Forest include: Chingford, Walthamstow and Leyton within Waltham Forest and Enfield, Edmonton, Tottenham, Stoke Newington, Hackney, Wanstead, Woodford, Loughton, Sewardstonebury and Lippits Hill outside Waltham Forest.

\(^6\) The distances bands have been tailored to the average width of the open corridors to the east and west of Waltham Forest’s urban areas.

\(^7\) The significance of existing urbanising influences has a direct influence over the relative openness of Green Belt parcels. The presence of urbanising influences is therefore used as a proxy for assessing the degree of openness within a parcel.
<table>
<thead>
<tr>
<th>NPPF (2012) Green Belt Purposes</th>
<th>Issues for consideration</th>
<th>Criteria</th>
<th>Score /Value</th>
<th>Assessment method notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>forestry related development).</td>
<td>is relatively open, 1 If land parcel does not contain countryside or contains urbanising development compromising openness, 0</td>
<td>lighting, pavements. Urbanising built development does not include agricultural or forestry related development or isolated historic schools/churches.</td>
</tr>
<tr>
<td>b</td>
<td>Significance and permanence of boundaries / features to contain development and prevent encroachment</td>
<td>Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel).</td>
<td>If no significant boundary between the parcel and the neighbouring settlement, 2 If less significant boundary between the parcel and the neighbouring settlement, 1 If there is a significant boundary between the parcel and the neighbouring settlement, 0</td>
<td>The significance of boundaries within and in close proximity to the parcel will be determined by the boundaries’ role in inhibiting encroachment of the countryside. This role is defined by the location of boundaries, i.e. boundaries close to the existing urban edge are more significant than those further away, and the type of boundary: Significant boundary = railway, river, motorway/dual carriageway. Less significant boundary = stream, topography / steep slope.</td>
</tr>
<tr>
<td>4</td>
<td>To preserve the setting and special character of historic towns.</td>
<td>Presence of historic towns.</td>
<td>Is the parcel within or adjacent to a Conservation Area within the urban area of Waltham Forest or a neighbouring Borough? Is the parcel within or adjacent to urban areas of Waltham Forest identified in the Borough’s Characterisation Study8 as dominant in historical development from the Victorian, Warner, Edwardian, Garden City or Inter-War periods?</td>
<td>If yes, 4 If no but within a prominent location, i.e. over 55m above sea level, 2 If no, 0</td>
</tr>
<tr>
<td>5</td>
<td>To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</td>
<td>The need to incentivise development on derelict and other urban land within settlements.</td>
<td>All Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. This makes it difficult to assess whether one individual parcel considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. What can be said is that all parcels make an equally significant contribution to this purpose and are each given a score of 4.</td>
<td></td>
</tr>
</tbody>
</table>

---

8 Waltham Forest Characterisation Study: Final Report (July 2009), London Borough of Waltham Forest.
3.11 The scores against each criterion were combined to generate a total score for each parcel. The higher the score the greater the parcel’s overall contribution to the Green Belt purposes. The total scores for each parcel are presented graphically in Figure 4, indicating the overall contribution each parcel makes to the Green Belt purposes.

3.12 While the aggregation of scores across all the purposes is a practical way of understanding the overall and relative contribution of the Green Belt in the Borough, the NPPF (2012) does not require all the purposes of Green Belt to be met simultaneously. Indeed, even if one purpose is met, a parcel of land could make a significant contribution to the Green Belt. Therefore, each parcel’s score against each of the Green Belt purposes is presented at the end of each parcel’s assessment sheet (see Appendix 1) so that the contribution the parcels make to individual purposes can be understood.

Criteria for assessing MOL parcels

3.13 Policy 7.17 of the London Plan (2011) indicates that land designated as MOL should meet one or more 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 sports, arts and cultural activities, which serve either the whole or significant parts of London;
   - It contains features or landscapes (historic, recreational, biodiversity) of 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.

3.14 The assessments of MOL determine whether the parcels meet these criteria.

Boundary adjustments

3.15 The alignment of the edge of the Borough’s existing Green Belt and MOL designations were checked to ensure their boundaries follow readily recognisable and permanent features on the ground, in accordance with the NPPF (2012). Where this is not the case, e.g. irregularities in the Council’s Green Belt and MOL maps, recommendations have been made on the appropriate realignment of the Green Belt and MOL boundaries along readily recognisable and permanent features on the ground.

Site visits

3.16 While the parcels were assessed remotely in the first instance using OS maps and aerial images, site visits were also made in order to ‘ground truth’ the information.

Task 4: Reporting

3.17 This report is the final output of the Green Belt and MOL review. The remainder of the report sets the assessment findings, tougher with conclusions and recommendations.
4 Assessment findings

4.1 This Chapter sets out the overall findings of the review of Green Belt and MOL in the London Borough of Waltham Forest.

4.2 Thirty five parcels of existing Green Belt land were assessed. Two parcels of currently undesignated open land that have the potential for Green Belt designation were also assessed. Seven MOL parcels were assessed. Together, the 44 parcels cover all the larger open spaces within the Borough.

4.3 A series of maps present the overall results of the land parcel assessment, as follows:

- Figures 3 and 4: an overview map illustrating the recommended minor Green Belt (Figure 3) and MOL (Figure 4) boundary adjustments.
- Figure 5: an overview map illustrating the overall scores of each Green Belt and MOL land parcel.

4.4 Appendix 1 comprises all the assessment sheets. The recommended minor boundary adjustments are in Appendix 2. A table listing the scores of each parcel is provided in Appendix 3.

Minor boundary adjustments

4.5 Figures 3 and 4 illustrate the location of 13 minor Green Belt and 6 minor MOL boundary adjustments, respectively. The recommended adjustments ensure that the boundaries of the two designations follow the most appropriate readily recognisable boundaries and are consistent across the Borough. Appendix 2 contains individual maps of the minor adjustments. Each map is accompanied by a short justification.
Map Scale @ A4: 1:55,000

Borough Boundary
Green Belt
Metropolitan Open Land

Proposed Minor Boundary Adjustments
Additions to Green Belt
Removals from Green Belt

Figure 3
Green Belt Amendments
Source: Natural England, English Heritage, Environment Agency
Borough Boundary
Green Belt
Metropolitan Open Land

Proposed Minor Boundary Adjustments
- Additions to Metropolitan Open Land
- Removals from Metropolitan Open Land

Source: Natural England, English Heritage, Environment Agency
Overview of findings

4.6 The detailed assessment findings for each GB and MOL parcel are contained in Appendix 1. The following paragraphs provide an overview of GB and MOL performance across the Borough.

Higher-performing Green Belt parcels

4.7 The higher performing Green Belt parcels generally fall within the northern and eastern parts of the Borough and form part of Epping Forest. The parcels are generally undeveloped areas of woodland and/or wood pasture which lie between Waltham Forest and the neighbouring Epping Forest District and London Borough of Redbridge. The high performance of these parcels is attributable to strong scores across a range of Green Belt purposes, most notably the sense of openness of these parcels, the extent to which they prevent encroachment into the countryside and contribute to the separation between Waltham Forest and the neighbouring Epping Forest District and London Borough of Redbridge.

4.8 Two parcels in the west of the Borough also perform highly (GB27 and GB34). These are tracts of open, ‘remnant countryside’ land in the Lea Valley, which contrast with the other parcels that have been more significantly affected by infrastructure.

Mid-performing Green Belt parcels

4.9 Mid-performing Green Belt parcels are present both in the west and east of the Borough. The weaker performance of these parcels is attributable to a range of factors:

- GB2 in the north of the Borough was considered to play a lesser role than other parcels in terms of its role in preventing merging of urban areas. This is partly because it is a larger parcel at the edge of the urban area which is linked to a much larger area of Green Belt beyond which could play this role.
- GB4 in the east of the Borough was considered to play a lesser role because of the presence of ’The Ching’ waterway at the parcel’s eastern border, which acts as defensible boundary helping to prevent encroachment of the countryside, and the fact that the parcel does not form part of the setting or special character of neighbouring historic towns.
- GB36 and GB37 in the north west of the Borough were considered to play a lesser role because they are narrow strips within a wider band of Green Belt, which itself could prevent merging of urban areas.
- GB22, GB23, GB24, GB25, GB29 and GB30 in the west of the Borough are dominated by the reservoirs which themselves contain some significant boundaries within a relatively broad band of Green Belt.

Lower-performing Green Belt parcels

4.10 The lower performing parcels are present in various parts of the Borough and are generally small pockets of Green Belt land at the edge of the urban area. There are a range of reasons for the lower performance of these parcels:

- GB31, GB32 and GB33 are located in the west of the Borough close to the North Circular Road. These parcels generally perform poorly against all Green Belt purposes, apart from Purpose 2, which considers the role of Green Belt in preventing merging. Significantly, parcels GB31 and GB32 were not considered to be ‘countryside’, as they are significantly influenced by urban land uses (and in the case of GB32, the land itself has been urbanised).
- GB6 and 17 in the eastern part of the Borough are small pockets of Green Belt at the edge of the urban. Both parcels have been significantly affected by urban influences which have reduced their openness. They also contain, or lie adjacent to, significant boundaries which themselves would prevent encroachment of the wider countryside.
- GB10 and 18, also in the eastern part of the Borough, have been significantly developed, resulting in reduced openness and value in terms of a range of Green Belt purposes. GB10 comprises low and high rise housing development, while GB18 is effectively the land around the Green Man interchange.
4.11 It should be noted that the performance of Green Belt parcels outlined above is a function of the aggregation of scores across all Green Belt purposes. This means that there is scope for a 'higher performing parcel' either to score very well against a limited number of purposes, or well against a larger number of purposes. It also means that, even some of the lower performing parcels may score well against a limited number of purposes.

4.12 While the NPPF (2012) is silent on this matter, there is a general acceptance and endorsement in case law that, even if a parcel of land meets only one of the Green Belt purposes, it can serve an important role as Green Belt.

Assessment of open land not currently designated as Green Belt

4.13 Two parcels of predominantly open land that are not currently designated were assessed against the purposes of Green Belts:

- GB21 comprises the Coppermills Water Treatment Works, which was opened in 1969 and is owned and managed by Thames Water as a major supplier of water to the London area. The parcel was considered to play a limited role against Green Belt purposes as, although having a sense of openness, the parcel is largely developed. It is therefore not recommended for inclusion in the Green Belt.

- GB26 is a small area of allotments adjacent to Higham Hill. It was considered to be a mid-performing parcel, due to it being relatively open with few urbanising influences and sitting adjacent to an area of the Borough with historic Garden City-type residential streets. It is recommended the Borough should consider the inclusion of this area in the Green Belt. In doing so, the Borough should be mindful of the 'tests' outlined in paragraph 82 of the NPPF (2012), which are outlined in paragraph 2.17 of this report.

Assessment of Metropolitan Open Land

4.14 Seven parcels of MOL were assessed:

- MOL2, MOL3, MOL4 and MOL5 are located in the Lea Valley in the west of the Borough. They were all considered to perform strongly as MOL, meeting all four of the MOL criteria.

- MOL6 and MOL7, to the south of the main area of MOL described above, form part of the Lea Valley and the Queen Elizabeth Park. As part of a larger area of open land, MOL6 is considered to meet three of the four MOL criteria and MOL7 all four of the MOL criteria.

- MOL1 is Larks Wood and Larkswood playing fields towards the centre of the Borough. This was considered to meet three out of four of the MOL criteria.

Assessment of Green Belt as potential MOL

4.15 Parcels GB22, GB25 and GB27 are contiguous with the main area of MOL to the south. These parcels form part of the 'Walthamstow Wetlands' project, which will significantly enhance public access to this area, making it more akin to a 'strategic park'. The Borough therefore may wish to consider designating this area as MOL, noting that this designation affords a very similar level of protection from development as Green Belt.
This MOL meets all four of the London Plan criteria for MOL.

This MOL meets three of the four London Plan criteria for MOL.

Metropolitan Open Land Parcel

Green Belt Overall Score
High: 20
Low: 4

Borough Boundary

London Borough of Waltham Forest - Green Belt Review

Figure 5

Overall Findings
Source: Waltham Forest London Borough Council, CPRE
5 Conclusions and next steps

5.1 This final chapter draws overall conclusions from the assessment and suggests some next steps, in terms of how the Borough might use the findings as part of Local Plan preparation.

Overall performance of the Green Belt

5.2 In general, the review has demonstrated that the majority of the Green Belt continues to serve its purposes very well. In particular it helps to maintain the Borough’s distinct identity and to provide opportunities for residents to enjoy the countryside close at hand. In the north of the Borough the Green Belt also plays a strategic role in helping to prevent the encroachment of London into the surrounding countryside.

5.3 Similarly, the areas of MOL meet criteria for designation, providing opportunities for outdoor recreation close to where people live.

5.4 Much of the Green Belt and MOL also plays a significant role as ‘green infrastructure’, which not only makes the Borough a better place to live, but also increases the Borough’s biodiversity and resilience to climate change.

Changes to the Green Belt and MOL

NPPF and London Plan requirements

5.5 As noted in Chapter 2, the NPPF (2012) requires changes to the Green Belt to be made through the Local Plan process. This should include:
   i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
   ii. consideration of the need to promote sustainable development. The relevant sustainability issues include accessibility and environmental assets, as well as an assessment against Green Belt purposes.

5.6 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by effect on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt according to the five purposes9.

5.7 In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.

5.8 We therefore recommend that the Borough considers points i) and ii) above in the Local Plan preparation process.

5.9 As suggested in paragraph 85 of the NPPF (2012), the Borough may also wish to consider the need for ‘safeguarded land’. This is land taken out of the Green Belt in this plan period for potential development in the next plan period and protected from development proposals arising in the meantime by policies with similar force to Green Belt.

5.10 Policy 7.17 of the London Plan (2011) indicates that ‘Any alterations to the boundary of MOL should be undertaken by boroughs through the LDF process, in consultation with the Mayor and adjoining authorities’.

9 http://www.pas.gov.uk/documents/332612/1099309/Planning+on+Your+Doorstep+-++The+Biq+Issues+Green+Belt.pdf/bb5fcd90-fa29-42a0-9dd9-82b27a43f72f
Green Belt

5.11 Subject to the points in paragraph 5.5 above, all the lower performing parcels of Green Belt could be considered for removal. Parcels GB10, GB17, and GB32, in particular by virtue of the fact that development in these locations would effectively be ‘infill’ and would be well contained by the landscape. The land to the east of Shadbolt Avenue in parcel GB33 could also be considered for removal.

5.12 Some of the ‘mid-performing’ Green Belt parcels may also merit further, more detailed consideration, taking account of specific issues affecting all or part of the parcels. The southern part of GB37, for example, comprises scrubland, together with a number of redundant buildings which detract from the openness and countryside character of the parcel. It is understood that this part of the parcel has been the subject of both developer interest and also public complaints about the state of the land. Neither is a reason to remove the site from the Green Belt and, in any case, development on a small parcel of the Green Belt could lead to pressures for development within this narrow strip of Green Belt.

5.13 Unless exceptional circumstances can be demonstrated for removing GB37 from this Green Belt, we therefore recommend that the Council focuses effort on the enhancement of this part of the Green Belt, including the removal of the redundant buildings. This could be achieved through the use of Community Infrastructure Levy funding or from S106 funding from other Green Belt sites proposed for release through the Local Plan.

MOL

5.14 By definition, MOL plays a positive, strategic role in providing recreational opportunities and providing for nature conservation, amongst other uses. The assessment found that all the Borough’s MOL meets these criteria for designation.

5.15 As noted in paragraph 4.15, above, Green Belt parcels GB22, GB25 and GB27 are contiguous with the Borough’s main area of MOL to the south, which also extends into the London Boroughs of Hackney and Newham. These parcels form part of the ‘Walthamstow Wetlands’ project, which will significantly enhance public access to this area, making it more akin to a ‘strategic park’. We recommend that the Borough considers designating this area as MOL, noting that this designation affords the same level of protection from development as Green Belt.

5.16 Forming part of the Lea Valley, MOL 3 represents an important strategic open space between the built up areas to the west (Hackney) and east (Walthamstow). The majority of the parcel is clearly distinguishable from the built up area, but the southern part is dominated by the Lea Valley Ice Centre, which comprises a large building and an extensive car parking area. Despite the impact of Ice Centre on the sense of openness, the parcel as a whole was assessed as meeting all the four criteria for MOL designation.

5.17 We note, however, that the Lea Valley Park Authority is currently considering options for the future of the Ice Centre, which include relocating the Centre to an alternative site. We recommend that the Borough supports such relocation as this would provide an opportunity to rationalise the land uses in MOL3 and enhance the sense of openness, particularly views north-south along the Lea Valley. We also refer to this in relation to MOL4 and MOL6, below.

5.18 MOL4 lies across the Lea Bridge Road to the south and also represents an important strategic open space between the built up areas to the west (Hackney) and east (Walthamstow). The majority of the parcel in the east and south comprises the Waterworks Nature Reserve and Golf Course, including a visitor centre in the north east corner of the parcel. The western part of the parcel comprises the Thames Water Depot, which is used for a range of office uses (mainly in the Victorian villa-style building in the west), internal storage (in former water works buildings) and external storage in a large open yard. The buildings are of some architectural and historic merit, although English Heritage decided not to list the buildings following an application by a local amenity group in 2012.

5.19 We understand that the site owner, Thames Water, has aspirations to develop the site and that initial pre-application discussions has already been held. However, in the light of our assessment, should the necessary ‘very special circumstances’ for development in this location be established, we recommend that the Borough should require:
• the majority of the site to be kept open and make it publically accessible;
• development to be focused in the western part of the site in the area currently occupied by the historic buildings - as a form of enabling development for the restoration of the open storage area for open space use.
• secure the relocation of the Waterworks Visitor Centre to one of the existing historic buildings in the western part of the site. This area is more accessible on foot and by bicycle and a parking area could be created, if necessary.

5.20 This would help to ensure that all of the relevant MOL criteria are met for the remaining, undeveloped, area and restore the physical, visual and ecological connectivity along the Lea Valley. It would also accord with Proposal 2.A.6.1 of the Lea Valley Regional Park Development Framework (2011):

’Work with Thames Water, London Borough of Waltham Forest and other stakeholders to identify options for a development at the Thames Water Depot site that will bring this site into a Park compatible use. Appropriate uses would include (but are not restricted to) one or more of the following:

• a waterside visitor hub incorporating leisure related uses;
• a biodiversity based and/or heritage related visitor attraction;
• accommodation serving visitors to the Park
• ‘community’ related activity and uses as defined by the Authority’s adopted Thematic Proposals; and
• new recreational or sporting facilities

The type, scale and design of any development would need to be appropriate in term of the site’s designation as Metropolitan Open Land and its location within the heart of the Regional Park. Development or use of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area. It should also enhance landscape quality, the ecological values of the environment and adjoining waterways and protect and bring back into public use buildings of heritage value. The frontage of the site on to the waterways should be protected from any development as an ecological margin. Development of the site should encourage sustainable modes of transport, improve pedestrian and cycle networks and safeguard the route of the Black Path through part of the site. Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority’s remit and does not accord with the proposals set out in the Park Development Framework will be resisted’.

5.21 In pursuing and justifying this objective for MOL4, we recommend that the Borough also takes a wider view of the development of this area, reflecting the planning policy and development context. In addition to the relevant national planning policy (2012) and guidance (2014) and the London Plan (2011), key considerations include:

• The imminent re-opening of Lea Bridge station, which will enhance access to the area by public transport and provide a catalyst for the regeneration of the Northern Olympic Fringe area.
• The Mayor’s Northern Olympic Fringe Housing Zone (June 2015), which will unlock and accelerate housing schemes in area in line with the Area Action Plan (see below) and investigate ways to create a mixed-use industrial and residential area in the Northern Olympic Fringe.
• Northern Olympic Fringe Area Action Plan (LB Waltham Forest Preferred Options Consultation 2011). In paragraph 4.28 this AAP supports the opening up of any Metropolitan Open Land sites that are currently not for public use. Where it is appropriate, the Council supports the development of compatible uses to enable this to be achieved.
• Olympic Legacy Supplementary Planning Guidance (July 2012). This seeks to regenerate and to renewal the neighbourhoods of Lea Bridge, Leyton, and Chobham by providing new links into the Queen Elizabeth Olympic Park, the wider Lee Valley Regional Park, and the new employment and retail opportunities at Stratford. This will be supported by new residential uses, enhanced open spaces, employment generators and retail opportunities. It also states
that north to south connections along the River Lea should be improved and an area wide way finding strategy will be developed to encourage and support walking and cycling.

5.22 We also recommend that the Borough considers MOL4 in tandem with MOL3, which includes the Ice Centre. As noted above, should the very special circumstances for development in this location be established, we recommend that the Borough supports relocation as this would provide an opportunity to rationalise the land uses in MOL3 and enhance the sense of openness, particularly views north-south along the Lea Valley.

5.23 We recommend that the Borough consults with the GLA and neighbouring authorities on the planning mechanisms to secure the rationalisation of uses in MOL3 and MOL4, to achieve the objectives outlined above. We recommend that the Borough also prepares a planning brief (as SPD) for the two sites. A Section106 Agreement with the landowners is also likely to be required.

5.24 Based on a preliminary analysis of the sites, we recommend that the planning brief seek to secure the following:

- a change to the boundary of MOL3, to facilitate the development of the western part of the parcel (essentially the existing parking area and surrounding land);
- a change to the boundary of MOL4, as outlined above, to facilitate the development of the western part of the parcel MOL in the area currently occupied by the historic buildings;
- achieve the planning objectives outlined in para. 5.20, above.

5.25 MOL6 was assessed as meeting three out of four of the MOL criteria. Although it forms part of the Queen Elizabeth Olympic Park and Lea Valley Park, it does not have a strong sense of separation from the urban area. The site’s sense of openness, a characteristic of MOL, is diminished by the large building (Hockey Centre) on the site and the major roads to the north and south.

5.26 Subject to detailed feasibility assessment, the site could make a good location for the Lea Valley Ice Centre.

**Promoting enhancement and positive use of the Green Belt and MOL**

5.27 In accordance with Paragraph 81 of the NPPF (2012) and Paragraph 7.55 of the London Plan (2011), the Borough should seek to secure positive use and enhancement of the Green Belt.

5.28 The key opportunities for enhancement lie on the western side of the Borough, where the Lea Valley Park Authority in partnership with the Borough is already pursuing this aim. The Walthamstow Wetlands Project is a good example. There may be scope to extend this kind of initiative across wider areas of Green Belt, through negotiation with landowners and with funding from the Community Infrastructure Levy or Section 106 Agreements (as well as the Heritage Lottery Fund and potentially other sources).

5.29 In paragraphs 5.13 to 5.24 above, we have considered the potential to enhance MOL3 and MOL4, together with the planning mechanisms by which this could be achieved.