

**Public Examination of Enfield's Development Management Document (DMD)**

**Enfield Council's Response to MIQs raised by the Inspector**

**MATTER 7 GREEN INFRASTRUCTURE AND GREEN BELT**

**Question 1 - Should Policy DMD 74 be more supportive of artificial playing pitches with floodlighting in the Metropolitan Open Land and/or Green Belt having regard for paragraphs 73 and 89 of the NPPF?**

LBE Response

- 1.1 Policy DMD 74 seeks to balance the need for artificial pitches, which can play a positive role in supporting health and community sports, with the potential negative impacts. Negative effects include those on residential amenity, through light and noise pollution, and harm to the character of a local area and biodiversity.
- 1.2 The Council recognises that outdoor sports and recreational facilities are appropriate uses within the Green Belt. The Policy responds to information gathered on the need and capacity to meet a playing pitch standard to meet needs up to 2026 at 0.70ha per 1,000 population, this is in accordance with paragraph 73 of the NPPF. Artificial playing pitches have an important role to play in meeting the 0.7ha standard as they offer regular all-year round usage and limit degradation. However, there are some negative aspects to these facilities which are addressed within DMD 74.
- 1.3 Part 4 of the Policy specifically seeks to addresses proposals for artificial playing pitches with floodlighting in Metropolitan Open Land and in the Green Belt, in order to protect the character and openness of the Green Belt and Metropolitan Open Land.
- 1.4 The huge value of Enfield's Green Belt areas is identified in the Enfield Characterisation Study (2011) [EBD-19], which states that 'Enfield borough has one of the largest areas of rural landscape in London and much of this is of high quality.' The Study goes on to state that 'these landscapes are of strategic importance for the borough providing a setting for the built-up areas and playing a key role in providing opportunities for recreation, nature conservation and agricultural activities. They are a tremendous asset for the borough which should be celebrated'. The Green Belt affecting Enfield is tightly drawn around the urban area, therefore the introduction of 'urbanising' features, such as floodlighting and loss of soft landscaping could cause significant harm to the sensitive character of the borough's Green Belt and areas of Metropolitan Open Land due to the impact of light pollution.

**Question 2 - Does Policy DMD 75 with focused change No 41 achieve a satisfactory balance between the diverse range of uses and functions, including industrial estates, which waterways serve?**

LBE Response

- 2.1 The Council considers DMD 75 in conjunction with [FC41] strikes a balance between the diverse range of uses and functions that Enfield's waterways serve. In reference to the industrial estates, a significant amount of land along the Lee Navigation is occupied by industrial land. The Council therefore considers it appropriate that new development opportunities be required to improve and maximise movement, access and the environment. The Council places great emphasis on ensuring that new development utilises Enfield's water space.

**Question 3 - Should the policy be more restrictive of residential moorings in the Lee Valley Regional Park?**

LBE Response

- 3.1 The Lee Valley Regional Park Authority (LVRPA) through its representation DMD75/23/002 requests that residential moorings within the Park boundary be restricted as it considers that such moorings would be inappropriate within the Park. The Council considers that this restriction goes beyond the remit of the planning system and DMD 75. However, having met with the LVRPA on the 6<sup>th</sup> March, the Council now proposes to put forward a minor change by way of an additional criterion (e) to take account of existing and future recreation uses as follows:

**"e. There is no adverse impact on existing and future water based leisure and recreation."....**

- 3.2 The Council and the LVRPA are continuing to work on a Statement of (Un) Common Ground which will be submitted shortly.

**Question 4 - Should the policy acknowledge that waterways have significance for ecology as well as for human access?**

LBE Response

- 4.1 The Council agrees that DMD 75 would benefit from acknowledging the ecological value of waterways and propose the following text be added to the first sentence:

**“DMD 75 Waterways**

**Waterfront Character and Access to Waterways**

All development proposed on or close to the riverside must protect and enhance the waterfront character **and ecological value**. Developments should maximise opportunities to provide publicly accessible riverside greenways or share routes” .....

**Question 5 - Is Chapter 11 of the Plan consistent with Core Policy 33 of the Core Strategy and with Chapter 9 of the NPPF? If not, what are the essential differences?**

LBE Response

- 5.1 The Council considers that Chapter 11 of the DMD is entirely consistent with Policy 33 of the Core Strategy. At the time of adoption of the Core Strategy Planning Policy Guidance 2 – Green Belts (PPG2) remained extant, but has since been revoked, but the DMD takes forward the key issues identified within the Core Strategy. Policy 33 contains reference to the strategic function of the Green Belt, the presence of major sites (Picketts Lock and Trent Park), the Crews Hill Defined Area and Areas of Special Character; these designations are also considered within the policies in Chapter 11.
- 5.2 The Council considers that Chapter 11 of the DMD is generally consistent with Chapter 9 of the NPPF but refers additionally to the designation of major sites and Areas of Special Character within the DMD to reflect important local circumstances. The Council’s approach on the two major sites is consistent with NPPF policy in that partial or complete redevelopment proposals can be considered. The Council’s policy includes the additional requirement that any such proposals be considered within the context of an appropriate masterplan for the site as a whole. This is not perceived as unreasonable or inconsistent with the principles of good planning given the scale and importance of these sites. The assessment of development proposals within the Areas of Special Character will of course be made with reference to Green Belt policy, however, there are additional design characteristics that are important within these areas and DMD 84 sets out the Council’s brief requirements in this respect.

**Question 6 - Is Policy DMD 83 justified and consistent with national policy, or does it extend Green Belt protection inappropriately to adjoining areas, emphasising visual impact rather than openness?**

LBE Response

- 6.1 The Policy does not extend Green Belt protection as it relates to the protection of visual amenity in urban fringe locations. It is considered that Policy DMD 83 is consistent with the aims of paragraph 81 of the NPPF which recognises opportunities to retain and enhance landscapes and visual amenity. The Council considers that it provides appropriate and clear guidance for the consideration of proposals in this area. The Enfield Characterisation Study (2011) [EBD-19] recognises the value of the Areas of Special Character as, 'areas of natural/ semi natural space, which lie within the more affluent parts of the borough help to define the various neighbourhoods, are readily accessible and provide both recreational opportunities and an attractive visual amenity'.

**Question 7 - Is the inclusion of land at Enfield Road in the Green Belt justified having regard for the Council's Detailed Green Belt boundary Review [EBD-18]?**

LBE Response

- 7.1 The adopted Core Strategy (2010) confirms that the Council will continue to protect and enhance Enfield's Green Belt and signals the intention to carry out a detailed review of the boundary at the local level to ensure it continues to be robust and defensible for the future.
- 7.2 As part of the preparation of the Development Management Document, a review of the Green Belt boundary has been completed. This review looked at the current strength of the existing boundary; potential adjustments needed to strengthen and improve its defensibility and resilience and sought to correct any inaccuracies in digital mapping. Public consultation on the draft findings and recommendations took place in July 2011, May 2012 and July 2013.
- 7.3 Land at Enfield Road remains a long standing Green Belt designation and in undertaking the detailed boundary review in 2011 the Council concluded the boundaries to the east, south and west of the site perform strong defensible boundaries. This provides the justification for this undeveloped site with its open character to continue to remain within the Green Belt.

**Question 8 - And is the land's inclusion in the Merryhills Brook Valley Special Character Area justified?**

LBE Response

- 8.1 Due to its proximity to the urban edge this is an area of Green Belt which is significantly under pressure and threat from development and urban blight. The Council considers that

the designation of the land as a Special Character Area is justified and is evidenced by the Characterisation Study 2011 which states that the area the Merryhills Brook Valley is an area of Green Belt which is under significant pressure and threat from development and urban blight due to its proximity to the urban edge.

**Question 9 - Do focused changes Nos. 44 and 45 overcome concerns about Policy DMD 89 relating to its 'two tier approach' for previously developed sites in the Green Belt?**

LBE Response

- 9.1 Focused Changes 44 and 45 retain a differential approach to previously developed sites in the Green Belt; however, a consistent approach to the partial or complete redevelopment of all sites is applied. The Council advocates a differential approach when considering redevelopment of the two Major Developed Sites within the Borough (Trent Park and Picketts Lock). In these instances as the sites have been identified as major redevelopment opportunities, further infilling would not be considered an appropriate way forward. In considering proposals for the complete redevelopment of these sites, the Council will expect any proposals to be guided by an appropriate masterplan or design guide befitting the extent and impact of these sites on the surrounding area. The Council considers that its additional requirement in relation to the two major sites is justifiable in terms of the future proper planning of these sites.