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# London Borough of Barnet Green Belt and Metropolitan Open Land Study

## Stage 1 Final Report

Prepared by LUC  
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Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Edinburgh  
Glasgow  
Lancaster  
Manchester



FS 866056 EMS 866057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
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# 1 Introduction

- 1.1 LUC has been commissioned to undertake an assessment of the Green Belt and Metropolitan Open Land (MOL) within the London Borough of Barnet. The study represents an important piece of evidence for the Borough's Local Plan. This Stage 1 report reports on the work undertaken in 2018 to inform the Council's Draft Local Plan. Following consultation on the Draft Local Plan, consideration will be given to the need for further detailed Green Belt and/or MOL assessment work to inform the Council's Proposed Submission Local Plan.

## Study Objectives

- 1.2 To date the **Stage 1** study has assessed:
- Existing Green Belt land in relation to the five purposes of the Green Belt designation set out in the National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG), with a view to identifying pockets of land which perform relatively poorly in Green Belt terms.
  - The openness of MOL, with a view to identifying pockets of land which have a lack of openness.
  - The accuracy and robustness of the existing Green Belt and MOL boundaries, as they appear on the Council's local data layer, recommending appropriate minor realignments along alternative permanent and readily recognisable physical features.
  - The potential for the designation of new areas of Green Belt and MOL.
  - The potential to build on the work of the GLA's All London Green Grid and related work within the Borough to enhance the Borough's Green Belt and MOL.
- 1.3 The findings of the Stage 1 Report and other relevant evidence will help the Council to define a preferred spatial strategy for growth including the selection and allocation of sites for development and safeguarding within the Plan period. If potential sites are identified within the Green Belt and MOL, further **Stage 2** work will be required to assess the potential degree of harm to Green Belt and/or MOL as a result of de-designation and development, to identify alternative Green Belt / MOL boundaries where possible using existing permanent and readily recognisable physical features. This Stage 2 work will help the Council to establish the necessary exceptional circumstances for Green Belt boundary revisions (set out in paragraphs 135, 136 and 137 of the NPPF).

## Stage 1 Report Structure

- 1.4 **Chapter 2** – sets out the Green Belt and MOL assessment methodologies for Stage 1 of the study. Chapter 2 also includes definitions for terms in national Green Belt policy and criteria for assessing contribution to the Green Belt purposes.
- 1.5 **Chapter 3** – summarises the findings of the Stage 1 Green Belt and MOL assessments, including the assessment of existing Green Belt and MOL, potential minor boundary adjustments and the potential for new Green Belt and MOL. Maps are included to provide an overview of the Stage 1 Study findings.
- 1.6 **Chapter 4** – sets the policy context driving the enhancement of the Green Belt and MOL, to inform how the Borough's new Local Plan can plan positively to improve the beneficial uses of the land within the designations.
- 1.7 **Chapter 5** – pulls together some notable conclusions from the assessment work carried out to date and makes some recommendations on next steps, notably how the Stage 1 study might be

used alongside the Council's other evidence to inform the Draft Local Plan and how future Stage 2 work could be used to help establish the necessary exceptional circumstances for Green Belt boundary revisions.

- 1.8 **Appendix 1** – sets out the national, regional and local policy context on designating and managing Green Belts and MOL. Appendix 1 also sets out guidance and case law related to Green Belts and MOL, approaches to equivalent studies in neighbouring local authorities and the local planning policy of the London Borough of Barnet.
- 1.9 **Appendix 2** – sets out the nature and pattern of Green Belt and MOL land within the London Borough of Barnet, set within the context of the Borough's settlement pattern, landform and character. Appendix 2 also maps the nature of the Borough's environment, including relevant environmental and planning designations related to flood risk, the historic environment, green infrastructure and open space.
- 1.10 **Appendix 3** – contains a summary of the written and verbal feedback received during the consultation of the study method statement, responses and associated actions.
- 1.11 **Appendix 4** – sets out the detail associated with the Stage 1 Green Belt and MOL assessments.

## 2 Stage 1 Assessment Methodology

- 2.1 There is no detailed planning policy guidance on how to undertake a review of Green Belt and MOL. The methodology set out in this Stage 1 report is built on a comprehensive and clear understanding of the planning policy context (see **Appendix 1**) and environmental context (see **Appendix 2**), our previous experience of undertaking similar studies and comments received from duty to cooperate partners follow consultation on a method statement (see **Appendix 3**).

### Method Statement Engagement

- 2.2 A method statement setting out the detailed methodology for both Stages 1 and 2 of the study was prepared and consulted upon with the Council's key stakeholders – neighbouring local authorities, the Great London Authority (GLA), Environment Agency, Historic England and Natural England – in June 2018. A summary of the consultation comments received and the responses is provided in **Appendix 3**.

### Green Belt Assessment Definitions and Criteria

- 2.3 Green Belt has a number of purposes, but 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.
- 2.4 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 are defined in more detail below.

#### Openness

- 2.5 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.
- 2.6 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.
- 2.7 **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>1</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. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness<sup>2</sup>.

2.8 **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>3</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.

2.9 As noted by the Inspector (M Middleton), in his letter to Welwyn Hatfield Borough Council (December 2017) (see **Appendix 1**) 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**.

### Permanence

2.10 The concept of permanence is a planning consideration rather than a physical or visual characteristic. Green Belt is a permanent planning designation. 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.

### NPPF Purposes

2.11 As outlined in **Appendix 1**, there are five Green Belt purposes as defined in paragraph 134 of the NPPF. A summary of the key criteria considered for each NPPF purpose is provided in the following section.

2.12 To draw out clear variations in contribution to each Green Belt purpose the five point scale set out in **Table 2.1** will be used.

**Table 2.1: Green Belt Contribution Ratings**

<b>Strong Contribution</b>	Green Belt performs well against the purpose.
<b>Relatively Strong Contribution</b>	Green Belt performs relatively well against the purpose.
<b>Moderate Contribution</b>	Green Belt performs moderately well against the purpose.
<b>Relatively Weak Contribution</b>	Green Belt performs relatively weakly against the purpose.
<b>Weak/No Contribution</b>	Green Belt makes a weak or no contribution to the purpose.

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

2.13 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

<sup>1</sup> This point is made in the judgement in *Heath & Hampstead Society v London Borough of Camden* (2008).

<sup>2</sup> *Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd* (2016), see Appendix 1.

<sup>3</sup> This point is made in the judgement in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (2016).

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.

- 2.14 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'.

#### *London Borough of Barnet's definition of 'large built-up area'*

- 2.15 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 1**, 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'*

- 2.16 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?"*

- 2.17 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."*

- 2.18 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*

- 2.19 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>4</sup>).
- 2.20 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 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.
- 2.21 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

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<sup>4</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 cannot be "urban sprawl" and cannot have an "urbanising influence".

which expansion of a large built up area would be considered sprawl – ie this is a key difference between Purpose 1 and Purpose 3.

2.22 Land which is more clearly associated with a settlement that is not a large built up area can be considered to make no direct contribution to Purpose 1.

2.23 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:

- Does the land lie in 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 (eg landform)?

2.24 **Table 2.2** summarises the criteria that were used for the assessment of Purpose 1.

**Table 2.2: 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>Strong</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>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>Moderate</b> Contribution	Land adjacent or close to the large built-up 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>Relatively Weak</b> Contribution	Land adjacent or close to the large built-up area that already contains urban sprawl compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.
<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.

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

- 2.25 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.

### *Definition of 'towns' in the London Borough of Barnet*

- 2.26 All towns within the London Borough of Barnet 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 Hertsmere which lie in close proximity to the built-up area of London that is within Barnet. Hertsmere Borough Council's adopted Core Strategy<sup>5</sup> names Borehamwood, Potters Bar and Bushey as the three most significant settlements within the Borough's settlements hierarchy. Borehamwood is the closest to the urban area of Barnet, with the narrowest gap between Borehamwood and London measuring at less than 500 m. Bushey and Potters Bar are roughly 2.5km to the north and west of Barnet's built-up areas, respectively. Hertsmere Borough's Green Belt Assessment<sup>6</sup> defined the following settlements in Hertsmere as being relevant to Purpose 2:
- Borehamwood
  - Bushey / Bushey Village
  - Elstree village
  - North Bushey
  - Potters Bar
  - Radlett
  - Shenley
- 2.27 In addition to Borehamwood, Bushey and Potters Bar, Elstree village is the only other settlement within close proximity to Barnet. In this study, Elstree town is not considered to be a 'town'. 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 Barnet's large built-up area and Borehamwood there are distinctive smaller settlements in between Barnet and Bushey and Barnet and Potters Bar. The distinctive village of Elstree sits in the middle of the gap between Barnet and Bushey and Barnet and Borehamwood. The small historic village of Monken Hadley in Barnet and the larger village of Hadley Wood<sup>7</sup> in the neighbouring London Borough of Enfield sit in between the built-up area of Barnet and Potters Bar, although both settlements are partially merged with the large built-up area.
- 2.28 Although the large built-up area in Barnet, Borehamwood, Bushey and Potters Bar are the only settlements within and in close proximity to the study area considered to be of a sufficient size and significance to be defined as towns, the role of the smaller settlements of Elstree, Monken Hadley and Hadley Wood in reducing the perceived gap between the 'towns' will also be considered in the assessment of Green Belt land's contribution to Purpose 2.
- 2.29 The Green Belt assessment<sup>8</sup> in the neighbouring London Borough of Enfield also identified Potters Bar as a Green Belt 'town'. The Enfield Green Belt assessment also noted that some gaps between suburbs within the metropolitan urban area, such as the Lee Valley in between Waltham Forest and Enfield, were also considered to contribute to this purpose if they were found to preserve distinctions in the character of different areas. However, there are no such strategic gaps within Barnet.
- 2.30 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.

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<sup>5</sup> Hertsmere Core Strategy Development Planning Document, Hertsmere Borough Council, 2013

<sup>6</sup> Hertsmere Green Belt Assessment, Arup, 2017

<sup>7</sup> Hadley Wood has a narrow physical connection to the main metropolitan area. However it is relatively small and can be perceived as a separate settlement with its own setting. This makes the wooded Monken Hadley Common, and to a lesser extent the adjacent Hadley Wood Golf Course, important in preventing coalescence.

<sup>8</sup> Enfield Green Belt Assessment, LUC, 2017

### *Purpose 2 assessment criteria*

- 2.31 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 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.
- 2.32 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.
- 2.33 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 strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.
- 2.34 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 including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
  - Are there any connecting features between the towns including 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?
- 2.35 **Table 2.3** summarises the proposed criteria that were used for the assessment of Purpose 2 in the study.

**Table 2.3: Purpose 2 assessment criteria**

#### **Purpose 2: Prevent neighbouring towns from merging**

**Development/land-use:** 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.

**Location:** land juxtaposed between towns makes a stronger contribution.

**Size:** where the gap between settlements is wide, the Green Belt makes a weaker contribution.

**Separating features:** 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.

**Connecting features:** 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.

<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>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>Moderate</b> Contribution	Land that plays a role in inhibiting physical or visual coalescence of towns, but which is also bordered by separating features which prevent visual or physical coalescence of towns.
Relatively Weak Contribution	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>Weak/No</b> Contribution	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.

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

2.36 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment. To ensure that the London Borough of Barnet takes full account of this purpose, it is necessary to define ‘encroachment’.

*Definition of ‘encroachment’*

2.37 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 to the wider countryside.

2.38 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.

2.39 Paragraphs 145 and 146 of the NPPF and associated case law provides guidance on what land uses and features are considered to be ‘appropriate’ development in the Green Belt (see Appendix 1). Appropriate development within the Green Belt cannot, according to case law<sup>9</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.

<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.

2.40 The methodology doesn't 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 which will be considered separately in the landscape sensitivity assessment.

*Purpose 3 assessment criteria*

2.41 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:

- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses.
- ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).

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

2.43 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/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/visual point of view. However the same land in Green Belt terms may well make as equal contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.

2.44 In summary, 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?

2.45 **Table 2.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

**Table 2.4: Purpose 3 assessment criteria**

<b>Purpose 3: Assist in safeguarding the countryside from encroachment</b>	
<b>Development/land-use:</b>	where there is less urbanising land use and more openness, land makes a stronger contribution.
<b>Separating features:</b>	land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.
<b>Connecting features:</b>	an absence of physical features to link settlement and countryside means that land makes a stronger contribution.
<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>10</sup> ) and which does not have a relationship with the urban area.

<sup>10</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>Relatively Strong</b> Contribution	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>Moderate</b> Contribution	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>Relatively Weak</b> Contribution	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>Weak/No</b> Contribution	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.

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

- 2.46 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. Historic England’s response to the consultation on the study Method Statement in June 2018 highlighted the important contribution that the Borough’s historic settlements and their settings, notably Chipping Barnet, Mill Hill, Monken Hadley and Totteridge, make to the polycentric nature of historic London.
- 2.47 The London Borough of Barnet’s Characterisation Study<sup>11</sup> notes that Barnet originated as a series of small villages in the countryside that surrounded London and has grown to become a unified polycentric suburb of Greater London. Although none of the villages are considered to be of a sufficient size to be considered historic towns in their own right, the Borough’s Characterisation Study notes that almost all of the Borough’s historic settlement cores sit on the high ground and ridges of the Borough, offering views out over London. Therefore, Green Belt land which forms part of the settings of these historic settlements contributes to the setting and special character of historic London.
- 2.48 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.
- 2.49 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 a historic town?
  - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 2.50 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic settlements.
- 2.51 To ensure that the London Borough of Barnet takes full account of this purpose, it is necessary to establish which historic settlements have a physical and visual relationship with Barnet’s Green Belt land. Only three historic villages fall within or at least partly within Barnet’s Green Belt land:

<sup>11</sup> Barnet Characterisation Study, London Borough Barnet, 2010

- Mill Hill – the Mill Hill Conservation Area Appraisal<sup>12</sup> makes note of the surviving hay meadows and pastures which form some of the richest grassland communities in London and are important to the setting of the conservation area.
- Monken Hadley – the Monken Hadley Conservation Area Appraisal<sup>13</sup> notes that approximately 75% of the Conservation Area is designated as Green Belt land, *'which has influenced the nature of development and conserved the rural environment. As a result Monken Hadley has managed to retain its special green and leafy character, with so much open space, in sharp contrast with much of suburban London. King George's Field / Hadley Manor Fields are particularly noted for their rural quality, considering its location within the built-up area of Barnet. The hill also affords views south across London.'*
- Totteridge – Totteridge Conservation Area Appraisal<sup>14</sup> notes the area's *'open land forms part of London's Green Belt and part of a larger area of open land of high landscape quality, stretching westwards over parts of Harrow Weald.'* It is also noted that the area has southerly panoramic views through gaps in mature tree and hedgerow boundaries towards Mill Hill, Barnet and central London.

2.52 In addition, the historic core of Chipping Barnet/High Barnet follows the high ground on an east-west axis along Wood Street. The Wood Street Conservation Area Appraisal<sup>15</sup> notes *'elevated position enjoyed by Wood Street allows long range views down side roads to the south over the open countryside of the Dollis Valley'* as an important part of the settlements special character. The Church of St John the Baptist which occupies a focal point at the junction of Wood Street and High Street is noted as a key feature.

2.53 The Green Belt Assessment<sup>16</sup> in the neighbouring Borough of Hertsmere reviewed each historic settlement's Conservation Area Appraisals and identified potential for a significant relationship between the historic cores of Bushey and Radlett and the adjoining Green Belt. The historic cores of both Radlett and Bushey are a significant distance from the Green Belt land within the London Borough of Barnet. Radlett lies to the north of Borehamwood and Bushey's historic core lies in the western half of the settlement away from the London Borough of Barnet. Therefore, the Green Belt land within Borough is not considered to contribute to the setting and special character of these historic settlements.

2.54 The Green Belt assessment in the neighbouring London Borough of Enfield<sup>17</sup> considered there to be no specific relationship between any particular suburb and the Green Belt that warranted the suburb to be defined as part of a historic town. However, the study noted the evolution of development to the north of Enfield was as a retreat from London for upper and middle classes, reflected in the historic estates of Trent Park, Forty Hall, Capel Manor and Whitewebbs, and in the villas that characterise Clay Hill, Forty Hill and Bulls Cross. The preservation of these areas as locations beyond the city edge was therefore considered to be important to the historic setting of this edge of London. The preservation of a rural landscape beyond these settlements and parklands was also considered important in retaining the sense that these areas lie beyond the urban fringe, and are not sandwiched between built-up areas. The history of this area, which formed part of the Enfield Chase hunting forest until its subdivision in the late 18<sup>th</sup> century and which retains some ancient woodland blocks, adds to its contribution to the setting of north London. The London Borough of Barnet does not contain the same historic estates.

2.55 **Table 2.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

**Table 2.5: Purpose 4 assessment criteria**

<b>Purpose 4: Preserve the setting and special character of historic towns</b>
<b>Development/land-use:</b> less developed land makes a stronger contribution.
<b>Location:</b> an area that contains key characteristics, or important in views to or from them,

<sup>12</sup> Mill Hill Conservation Area Character Appraisal Statement, London Borough Barnet, 2008

<sup>13</sup> Monken Hadley Conservation Area Character Appraisal Statement, London Borough Barnet, 2007

<sup>14</sup> Totteridge Conservation Area Character Appraisal Statement, London Borough Barnet, 2008

<sup>15</sup> Wood Street Conservation Area Character Appraisal Statement, London Borough Barnet, 2007

<sup>16</sup> Hertsmere Green Belt Assessment, Arup, 2017

<sup>17</sup> Enfield Green Belt Assessment, LUC, 2017

makes a stronger contribution.

**Separating features:** 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.

**Connecting features:** where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.

<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>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>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>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>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.

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

- 2.56 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.”*
- 2.57 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.
- 2.58 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.
- 2.59 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 Barnet’s latest Brownfield Land Register has been used to calculate the area of brownfield land within the urbanised<sup>18</sup> area of the Borough.
- 2.60 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

<sup>18</sup> The urbanised area constitutes land within the Borough which does not fall within the Green Belt or MOL designations.

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.

- 2.61 Given the nature of the settlement pattern within Barnet, 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.
- 2.62 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.
- 2.63 The London Borough of Barnet Brownfield Register<sup>19</sup> contains a record of roughly 1,002.5ha of brownfield land within the Borough. Although no registered brownfield land sits within the Borough's MOL, roughly 7ha of the registered brownfield land falls within the Green Belt, leaving roughly 995.5ha within the urbanised area of the Borough. This represents 17.2% of the total urbanised area of the Borough, which is roughly 5,773ha. Given a significant proportion of the Borough's land is brownfield, all Green Belt land within the Borough is considered to make a **strong contribution** to Green Belt purpose 5.

## Stage 1 MOL Assessment

- 2.64 The essential characteristics of Green Belts – openness and permanence – apply equally to MOL. Both characteristics apply to Criterion 1 for designating new MOL set out in Policy 7.17 in the London Plan 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.
- 2.65 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. Therefore, the assessment of MOL is focussed on drawing out variations in the contribution of land within MOL to its inherent openness. The essential characteristic of openness is a combination of 'spatial' and 'visual' openness. 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 Green Belt land 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 however 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. It is possible to assess visual openness in greater detail when assessing the harm caused by specific developments in specific locations within or adjacent to MOL.
- 2.67 **Table 2.6** sets out the proposed criteria for rating MOL openness.

**Table 2.6: MOL Openness Ratings**

**Strong** Openness

Wholly open MOL free from buildings and structures that

<sup>19</sup> London Borough of Barnet Brownfield Register, London Borough of Barnet, 2017

	compromise spatial and visual openness.
<b>Relatively Strong</b> Openness	MOL free from significant buildings and structures which compromise spatial openness, but visual openness is reduced by neighbouring development.
<b>Moderate</b> Openness	MOL largely free from significant buildings and structures that compromise openness; however, some buildings and structures compromise spatial and/or visual openness.
<b>Relatively Weak</b> Openness	MOL within close proximity to significant buildings and structures that compromise spatial and visual openness.
<b>Weak / No</b> Openness	MOL which is wholly developed by buildings and structures that compromise spatial and visual openness.

## 3 Stage 1 Assessment Findings

### Assessment of Contribution to the Green Belt Purposes

- 3.1 The primary aim of the Stage 1 assessment is to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment criteria outlined in **Chapter 2**, a review of the contribution of Green Belt land to each of the five Green Belt purposes has been undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose.
- 3.2 **Figures 3.1-3.5** illustrate the assessed variations in contribution across the Borough for each purpose. The colours used in the Figures correspond with the rating colours used in **Tables 2.1-2.5** in **Chapter 2**. **Figure 3.6** illustrates the overall contribution of the Borough's Green Belt to Purposes 1-4 not by aggregating ratings against the purposes, but by only showing the highest contribution made to any one of the Green Belt purposes 1-4. Purpose 5 has not been included in this aggregated map due to the fact that all Green Belt land within the Borough is considered to make a strong contribution to this purpose and its inclusion would cloak the variations drawn out through the assessments of the other purposes. The NPPF weights all Green Belt purposes equally. Consequently, **Figure 3.6** should only be used to aid interpretation of the Stage 1 assessment findings and does not replace the detailed variations drawn out in **Figures 3.1-3.5**.

#### Contributions to Purposes 1 (To check the unrestricted sprawl of large built-up areas) and 3 (To assist in safeguarding the countryside from encroachment)

- 3.3 Contribution to Purpose 1 has been assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up area of Greater London. All Green Belt land within Barnet is, relative to the size of the Metropolitan Green Belt, close to the large built-up area of Greater London by virtue of the fact that Barnet is a London Borough with the vast majority of its development land contiguous with London. Therefore, almost all Green Belt land makes some contribution to Purpose 1, however weak. Variation in contribution to Purpose 1 has been drawn out based on variations in the presence, scale and density of built development and its influence in urbanising, compromising openness and/or separating pockets of land from the wider open countryside.
- 3.4 Contribution to Purpose 3 is assessed in a similar way to Purpose 1. Having established that all the Green Belt land within Barnet is relatively close to the large built-up area of Greater London for Purpose 1, what remains of the factors and characteristics that influence the contribution Green Belt land makes to Purposes 1 and 3 are very similar. Therefore patterns in the contribution Barnet's Green Belt land makes to these two purposes have been described together.
- 3.5 Green Belt land that contains no or very limited urban development and has a strong sense of openness, and relates strongly to the wider countryside as opposed to the urban area makes a strong contribution to Purposes 1 and 3. Conversely, Green Belt land that is fully urbanised by urbanising buildings and/or structures makes a weak contribution to Purposes 1 and 3. The remaining ratings help to draw out the more subtle variations in contribution between these two extremes. Notable variations in the contribution of Barnet's Green Belt land to Purposes 1 and 3 include:
- All Green Belt south of Mill Hill and Mill Hill East is not considered to make a strong or relatively strong contribution due to the fact that the land is separated from the wider open countryside surrounding London by the development north of Pursley Road/Devonshire Road and The Ridgeway.
  - The larger pockets of undeveloped Green Belt land south of Mill Hill and Mill Hill East centred on Allianz Park, Mill Hill Park and Arrandene Open Space and Finchley Golf Course are considered to make a moderate contribution by virtue of their size, i.e. they still retain some of the characteristics of open countryside despite being separated from it.

- The Green Belt land immediately to the north and east of the wooded Dollis Brook is considered to make a moderate contribution due to the role the wooded watercourse plays in separating this Green Belt land from the wider open countryside, isolating the urbanising influence of London's urban edge.
- Development in the open countryside sometimes plays a role in compromising openness of the countryside or marginally urbanising the countryside, resulting in pockets of land rating relatively strong and moderate.
- The remaining areas in the Borough make relatively weak or weak contributions due to the presence of urbanising buildings and structures within, adjacent to or separating them from the open countryside. Notable exceptions to these include land uses listed in paragraphs 145 and 146 of the NPPF.

### **Contribution to Purpose 2 (To prevent neighbouring towns from merging into one another)**

3.6 Contribution to Purpose 2 is assessed by determining the role Green Belt land plays in preventing the merging of neighbouring towns. Land that is juxtaposed between towns and plays a highly significant role in inhibiting physical and visual coalescence due to the narrowness and/or visual openness of a gap is considered to make a strong contribution to Purpose 2. Conversely, land which is not located within a gap between towns or sits in gaps with significant separating features and/or significant distances between towns is considered to make no or a weak contribution to Purpose 2. The remaining ratings help to draw out the more subtle variations in contribution between these two extremes. Notable variations in the contribution of Barnet's Green Belt land to Purpose 2 include:

- The Green Belt land in between Arkley, East Barnet and Hendon is considered to make no or a very weak contribution to Purpose 2 due to the fact that this Green Belt land is surrounded by urban areas contiguous with Greater London.
- The undeveloped, open Green Belt land in between Arkley (merged with Greater London) and the town of Borehamwood is considered to make a strong and relatively strong contribution to Purpose 2 in acknowledgement of the relative narrowness of the gap and the lack of significant separating features between the two settlements.
- The Green Belt land to the north of Chipping Barnet and East Barnet and around Monken Hadley is considered to make a relatively weak contribution to Purpose 2 in acknowledgement of the fact that this land sits in between Greater London and Potters Bar to the north. The relatively low contribution to Purpose 2 is recorded in acknowledgement of the size of the gap in combination with the role of topography and woodland in separating the two towns and in so doing preventing visual and physical coalescence.
- The Green Belt land in between Edgware (merged with Greater London) and Borehamwood is considered to make a moderate contribution to Purpose 2 in recognition of the relative narrowness of the gap, but also in acknowledgement of the significant features maintaining separation, notably the wooded ridge to the north and east of the M1 motorway and the A1.
- Development within gaps which make a contribution to Purpose 2 often reduce the contribution of the developed land as well as land in the immediate vicinity. The significance of this reduction is linked to the contribution of the wider Green Belt land to Purpose 2 and the scale and density of built development.

### **Contribution to Purpose 4 (To preserve the setting and special character of historic towns)**

3.7 Contribution to Purpose 4 is assessed by determining the role Green Belt land plays in preserving the setting and special character of historic Mill Hill, Monken Hadley, Totteridge and Chipping Barnet/High Barnet all of which have a recognised relationship with the open countryside designated as Green Belt. Open Green Belt land sitting within and in the immediate setting of the historic cores of each historic town is considered to make a strong contribution to Purpose 4. Conversely, Green Belt land that forms little or no part of the setting of the historic towns and does not contribute to its special character, due to the fact that the land has no visual connection with the towns or is wholly developed with buildings and structures that do not contribute to the special character of the historic towns are considered to make no or a weak contribution to

Purpose 4. The remaining ratings help to draw out the more subtle variations in contribution between these two extremes. Notable variations in the contribution of Barnet's Green Belt land to Purpose 4 include:

- The Green Belt land surrounding the recognised historic cores of historic Mill Hill, Monken Hadley and Totteridge which have a strong visual connection with at least one of the historic towns is considered to make a relatively strong contribution to Purpose 4.
- Green Belt land with a more distant and/or broken visual connection with a historic town are considered to make either a moderate or relatively weak contribution to Purpose 4.
- Open Green Belt land within the wider setting of a historic town that is urbanised by land uses which do not contribute to the special character of a historic town, such as tennis courts, are considered to make a relatively weak contribution to Purpose 4.

### **Contribution to Purpose 5 (To assist in urban regeneration by encouraging the recycling of derelict and other urban land)**

3.8 For the reasons set out in **Chapter 2** all Green Belt land is considered to make a strong contribution to Purpose 5.

3.9 Site visits have been undertaken to verify the desk-based judgements in the field.

3.10 For further insight into why a particular area of Barnet's Green Belt rates a particular way, readers are directed to the detailed maps presented in **Appendix 4** and rating text for each Green Belt purpose set out in **Tables 2.1-2.5** in **Chapter 2**.

# Barnet Green Belt and MOL Assessment

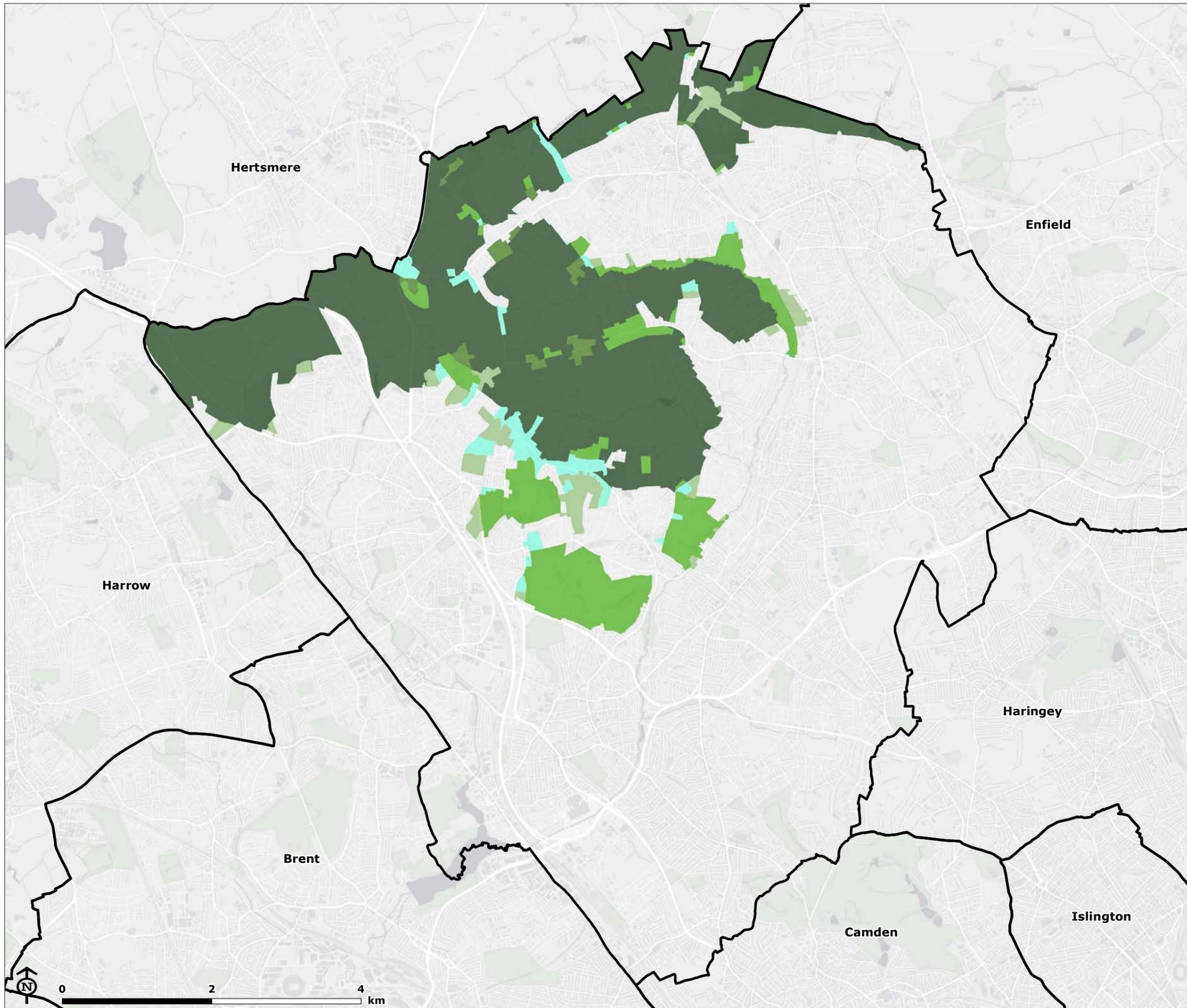
Figure 3.1

**Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas**

Local Authority Boundary

### Purpose 1 Assessment

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak



Map Scale @A3: 1:50,000



# Barnet Green Belt and MOL Assessment

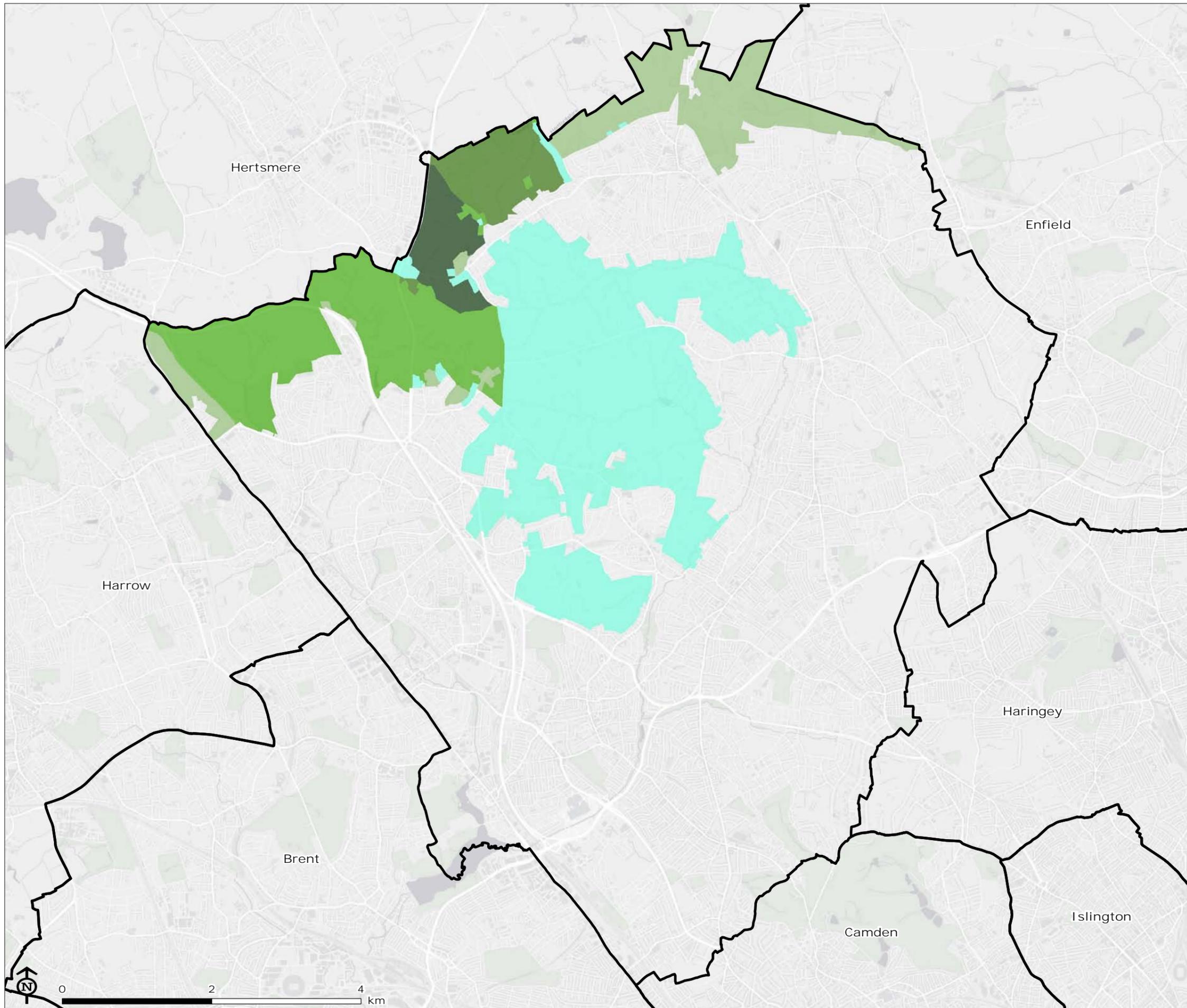
Figure 3.2

Purpose 2 Assessment - to prevent neighbouring town from merging into one another

Local Authority Boundary

Purpose 2 Assessment

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak



Map Scale @A3: 1:50,000



# Barnet Green Belt and MOL Assessment

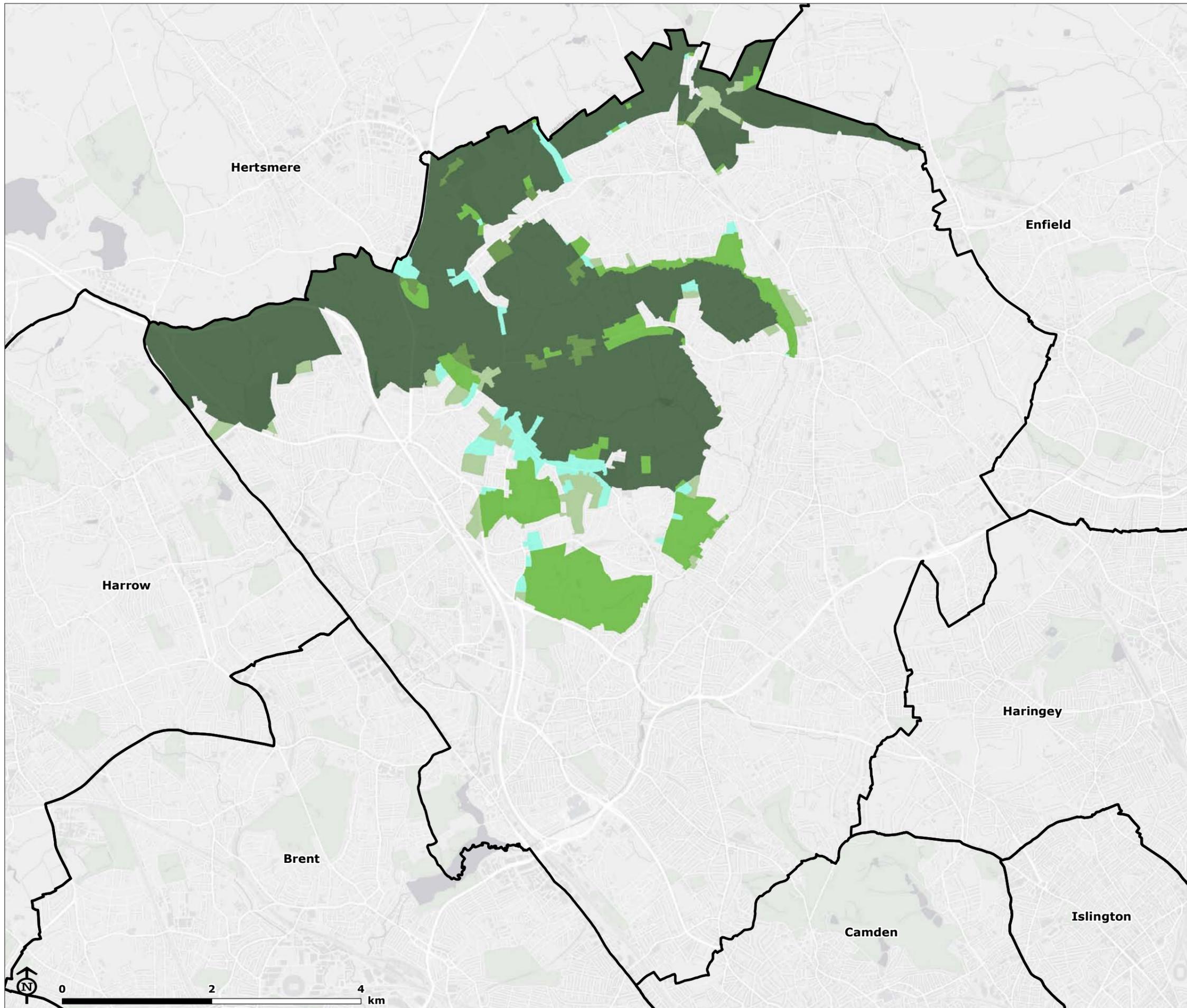
Figure 3.3

**Purpose 3 Assessment – to assist in safeguarding the countryside from encroachment**

Local Authority Boundary

### Purpose 3 Assessment

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak



Map Scale @A3: 1:50,000



# Barnet Green Belt and MOL Assessment

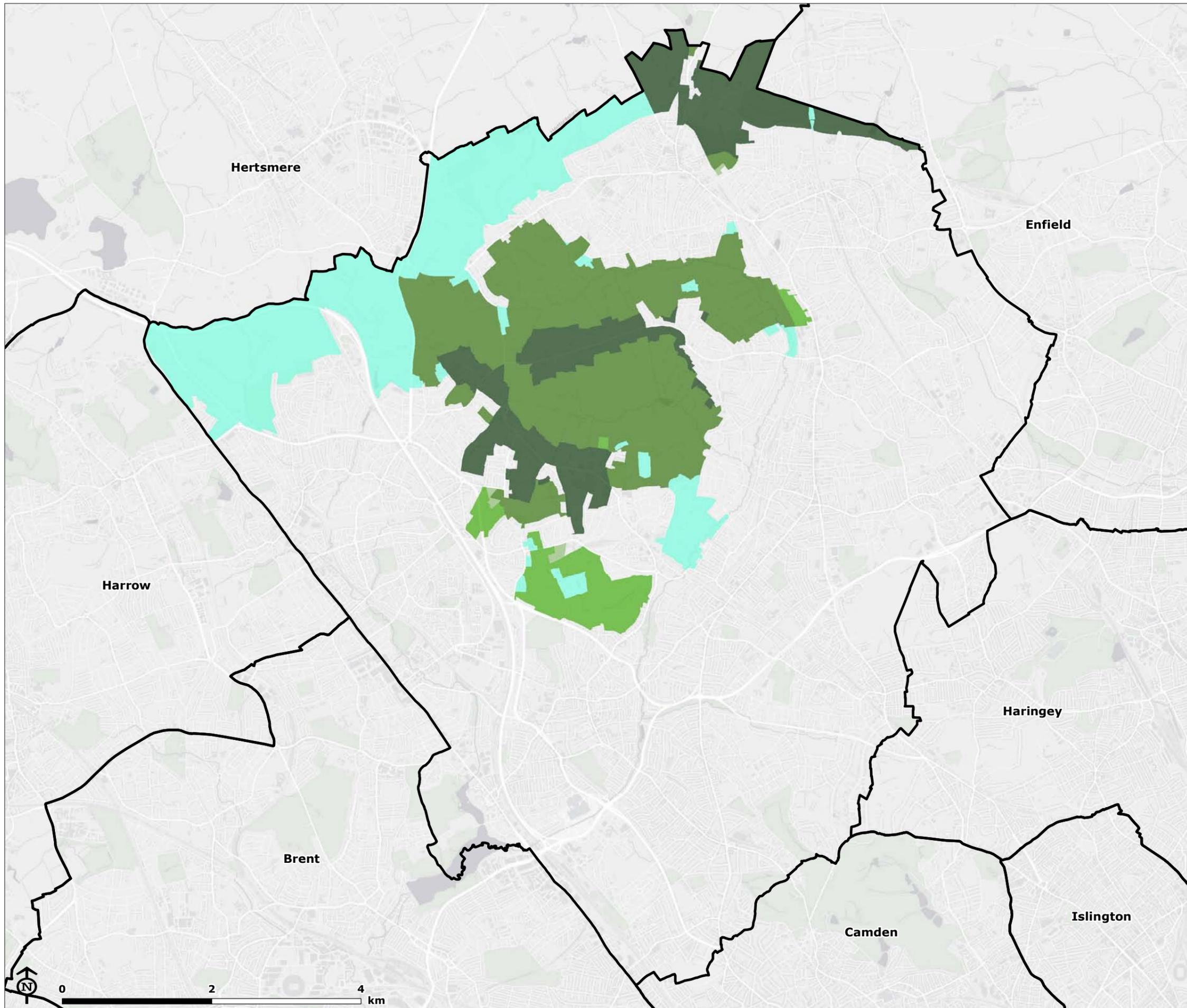
Figure 3.4

**Purpose 4 Assessment – to preserve the setting and special character of historic towns**

Local Authority Boundary

### Purpose 4 Assessment

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak



Map Scale @A3: 1:50,000



# Barnet Green Belt and MOL Assessment

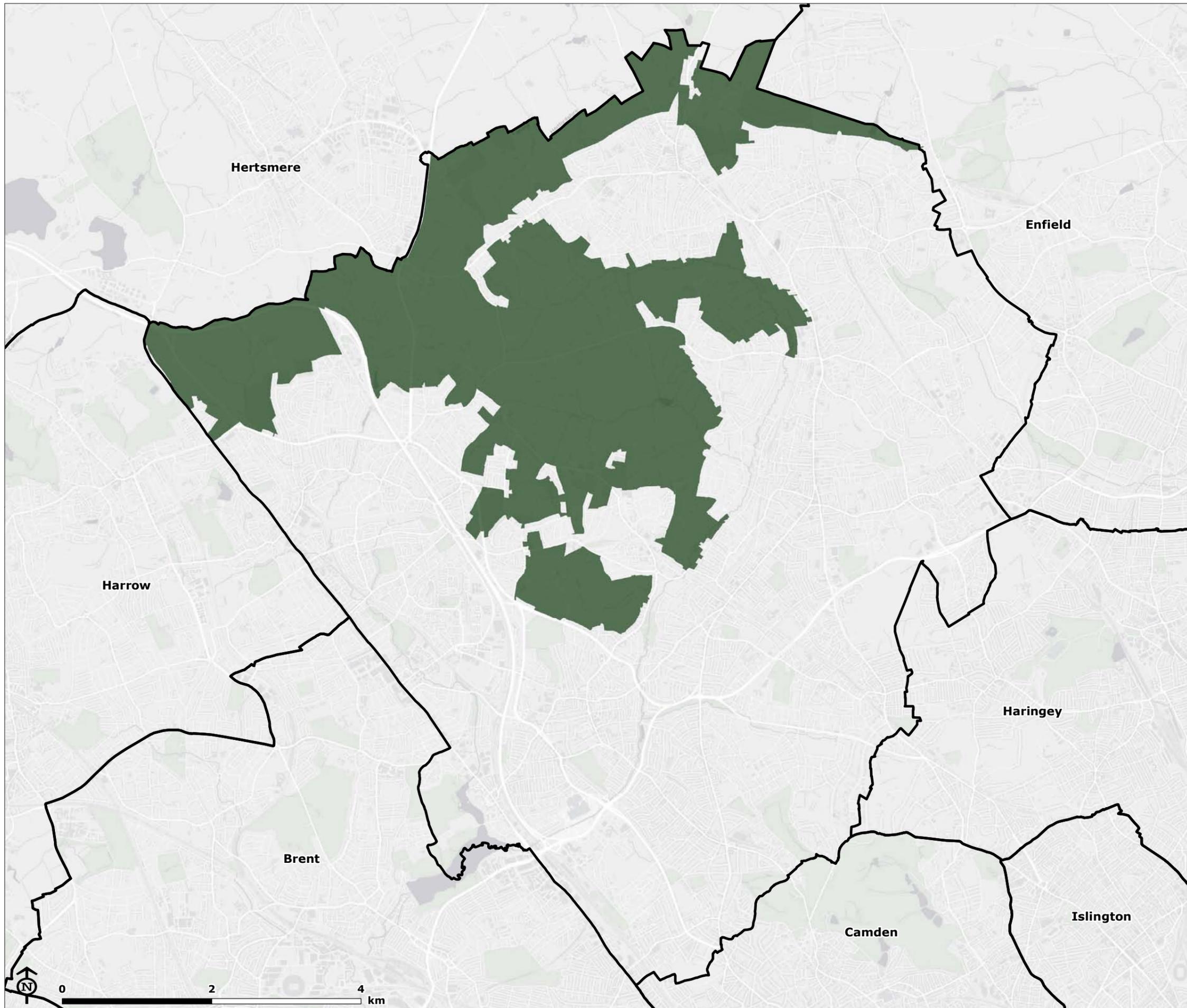
Figure 3.5

**Purpose 5 Assessment – to assist in urban regeneration by encouraging the recycling of derelict or other urban land**

Local Authority Boundary

### Purpose 5 Assessment

- Strong
- Relatively strong
- Moderate
- Relatively weak
- Weak



Map Scale @A3: 1:50,000



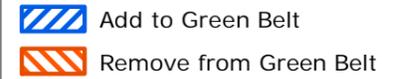
Barnet Green Belt and MOL Assessment

Figure 3.6

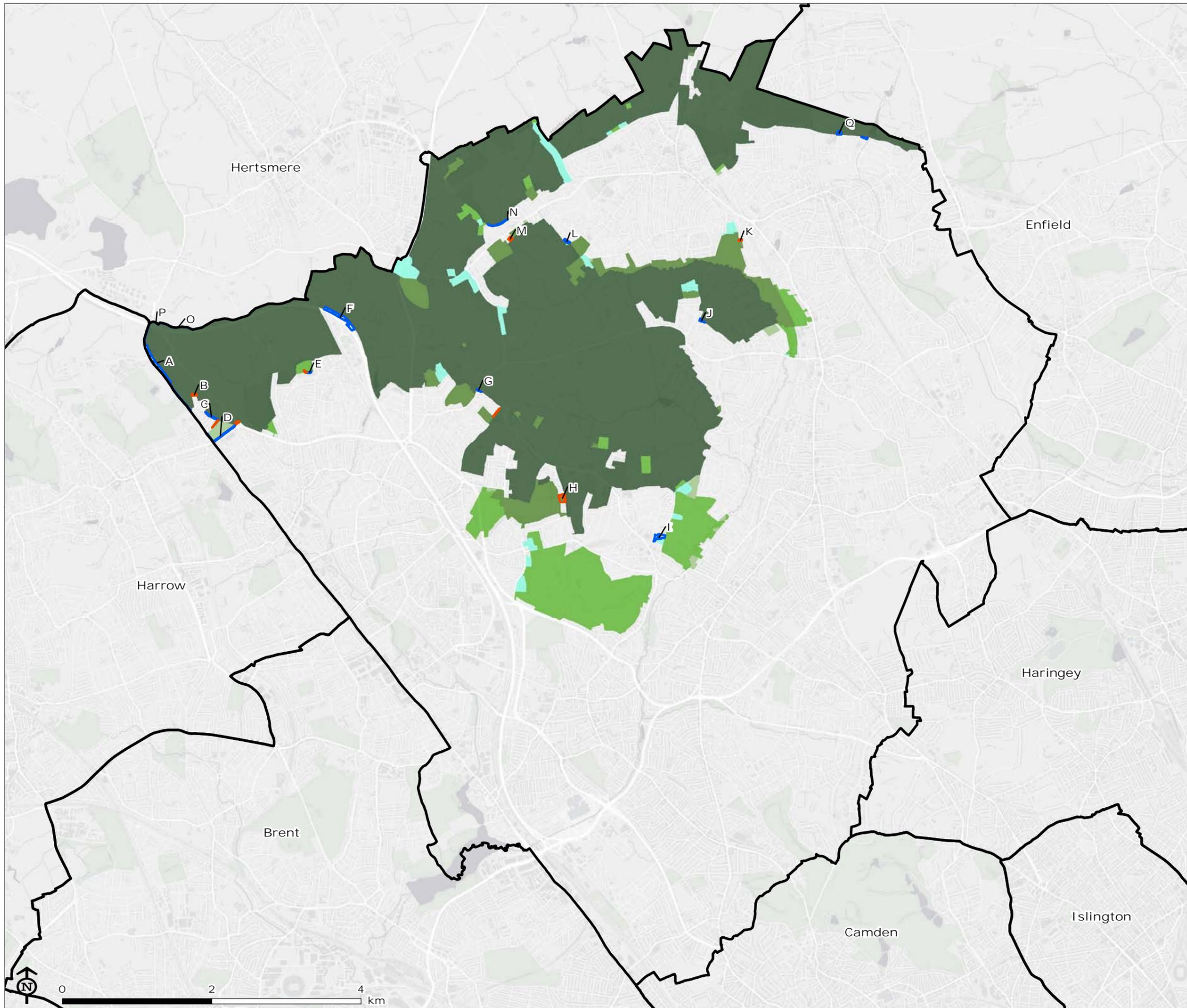
Highest Rating (Purpose 1 - 4)



Suggested Boundary Amendments



Each suggested boundary amendment is labelled with a letter. For more details on these refer to associated inset maps.



Map Scale @A3: 1:50,000



## Minor Green Belt Boundary Realignment

- 3.11 As part of the Stage 1 assessment, consideration has been given to the accuracy and robustness of the Council's existing Green Belt boundaries, with a view to highlighting areas of potential for realignments along alternative permanent and readily recognisable physical features where necessary. These potential minor Green Belt boundary adjustments are set out in detail in **Appendix 4**.
- 3.12 In combination the minor Green Belt boundary adjustments would result in the designation of an additional 6.92ha of land and the de-designation of 1.65ha, resulting in a net gain in Green Belt land of 5.27ha. This represents a 0.22% net gain in the total area of Green Belt within the London Borough of Barnet. However, 0.36ha of the area recognised as Green Belt gain is related to a recommendation to designate 0.36ha of MOL as Green Belt land.
- 3.13 A number of the potential Green Belt boundary adjustment – specifically B and C – relate to residential gardens which encroach into the Green Belt. Before further consideration is given as to whether the Green Belt boundary is redrawn to exclude the gardens, the Council may wish to establish whether the garden boundaries pre-date the existing Green Belt boundary and if not whether the appropriate permission was sought to grant the extension of the gardens into the Green Belt.

## Assessment of the Potential for Designating New Green Belt

- 3.14 Paragraph 135 of the NPPF states that the general extent of Green Belt across the country is already established and that new Green Belts should only be established in exceptional circumstances, when planning for larger scale development such as new settlements or major urban extensions. Once the spatial strategy for Barnet has been confirmed, the Council will be in a position to consider how the designation of new Green Belt land could help promote the sustainable pattern of development proposed in the Plan period and in the longer term.
- 3.15 The NPPF clearly states what is required of local planning authorities defining new Green Belt boundaries. Paragraphs 135 and 139 state that 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;*
  - *show how the Green Belt would meet the other objectives of the Framework;<sup>20</sup>...*
  - *...not include land which it is unnecessary to keep permanently open;*
  - *Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
  - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."<sup>21</sup>*
- 3.16 The existing edge of the Green Belt within and bordering Barnet does not border any significant areas of open land that are currently not designated as Green Belt. Therefore, it is considered that there are no suitable locations for strategic extensions to the Metropolitan Green Belt within and adjacent to the Borough.

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<sup>20</sup> Paragraph 135 of the National Planning Policy Framework

<sup>21</sup> Paragraph 139 of the National Planning Policy Framework

## Assessment of MOL Openness

- 3.17 The primary aim of the Stage 1 assessment is to establish the variation in the openness of MOL. Based on the assessment criteria outlined in Chapter 2, a review of MOL openness has been undertaken, drawing out spatial variations in openness where appropriate. The MOL within the Borough has been broken up into discreet pockets of land for assessment. **Figure 3.7** shows the location of each pocket. Detailed assessments of each pocket of MOL, including maps illustrating the assessed variation in openness across each pocket and the potential for minor boundary adjustments are highlighted in **Appendix 4**. Site visits have been undertaken to verify the desk-based judgements in the field.
- 3.18 A significant proportion of the MOL within Borough contains buildings and structures which compromise openness to varying degrees. However, the majority are of a relatively small scale and have a use which supports the use of the MOL as open space. Notable uses include cafes, sports clubs and supporting buildings, dwellings, churches and crematoriums, schools and colleges, glasshouses, maintenance buildings and nurseries.
- 3.19 The supporting text to Policy 7.17 of the adopted London Plan (2011) states that small scale supporting uses are appropriate in MOL. Consequently, although buildings and structures within MOL may affect openness, their use and scale are likely to make them inappropriate candidates for removal from the designation.

## Minor MOL Realignment

- 3.20 As with the Green Belt, consideration has been given to the accuracy and robustness of the Council's existing MOL boundaries, with a view to highlighting areas of potential for realignments along alternative permanent and readily recognisable physical features where necessary. These recommendations are set out in detail in **Appendix 4** and an overview is presented in **Figure 3.7**.
- 3.21 In combination the minor MOL boundary adjustments would result in the designation of an additional 0.82ha of land and the de-designation of 3.63ha, resulting in a net loss in MOL of 2.81ha. This represents a 0.407% net loss in the total area of MOL within the London Borough of Barnet. However, 0.36ha of the area recognised as MOL loss is related to a recommendation to designate 0.36ha of MOL as Green Belt land.

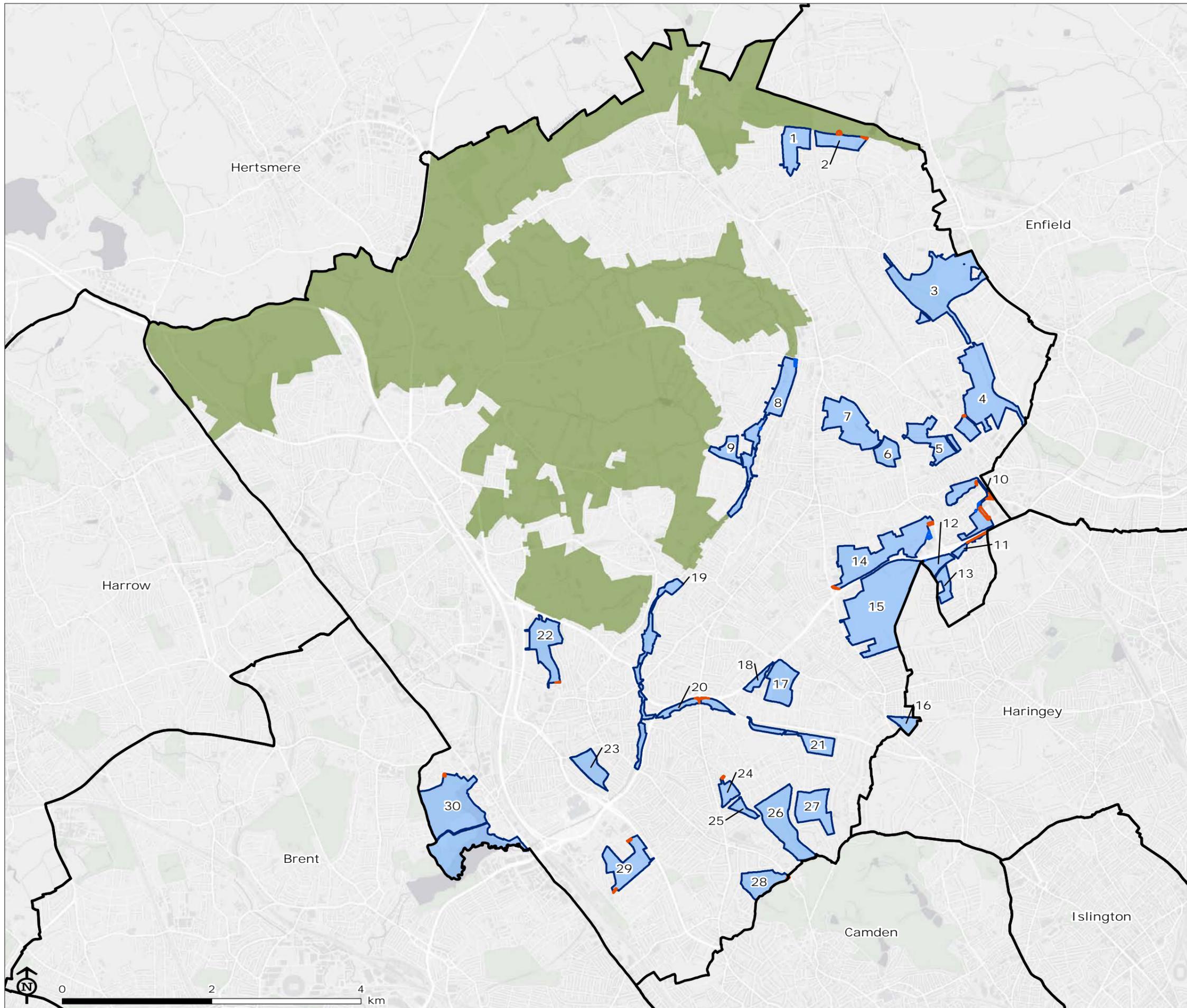
# Barnet Green Belt and MOL Assessment

Figure 3.7

MOL Overview

- Local Authority Boundary
- Greenbelt
- MOL
- Suggested Boundary Amendments
  - Add to MOL
  - Remove from MOL

Each MOL area is labelled with a number. For more details on these refer to associated inset maps.



Map Scale @A3: 1:50,000



## Assessment of the Potential for Designating New MOL

3.22 The 1976 Greater London Development Plan (GLDP) indicated that MOL should be '*safeguarded for predominantly open uses as much as Green Belt*'. It suggested that, in contrast to the Green Belt which surrounds London, areas suitable for MOL designation form '*islands embedded in the urban fabric or penetrating deeply into the urban area as green wedges*.' A more detailed definition was set out in the Strategic Planning Guidance for London in 1994. Further guidance on MOL designation was provided in 1996 with the publication of Regional Planning Guidance (RPG) 3:

'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'.

3.23 This general approach has been carried forward into the current London Plan (adopted in 2011) and a new Draft London Plan recently published for consultation by the GLA. The London Plan affords the same level of protection to MOL as to the Green Belt making paragraphs 135 and 139 of the NPPF, which set out the tests required to justify the designation of new Green Belt, equally relevant to the designation of MOL. 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 parts of London;
- It contains features or landscapes of either national or metropolitan value;
- If forms part of a Green Chain or link in the network of green infrastructure and meets one of the above criteria.

3.24 Public consultation on a new draft London Plan<sup>22</sup> took place between December 2017 and March 2018. Draft Policy G3 in the Draft London Plan replaces the phrase 'Green Chain or link' with 'strategic corridor, node or a link.' Although there is no clear definition of these terms in relation to MOL, the replacement of the words 'Green Chain' with 'strategic corridor, node' implies that greater emphasis should be put on physical access and connections along and between open spaces. 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.

3.25 Drawing on the above policy and guidance, a high-level review of the existing pattern of open spaces within and adjacent to the Borough has been carried out with a view to identifying strategic pockets and chains of open space which have the potential to be designated as new MOL, including isolated pockets of Green Belt that are no longer contiguous with the open countryside.

### **Open land contributing to the physical structure of London and/or including open air facilities serving the whole of significant parts of London**

3.26 The vast majority of the open land within the Borough which is not currently designated as MOL is either located in the open countryside, often forming part of the Metropolitan Green Belt, or too small to be considered to be of metropolitan significance, purely in terms of physical size.

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<sup>22</sup> Mayor of London, 2017, The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation [online] available at: [https://www.london.gov.uk/sites/default/files/new\\_london\\_plan\\_december\\_2017.pdf](https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf)

- 3.27 The size guidelines for categorising the significance of London's open spaces, set out in the supporting text to 'Policy 7.18 – Protecting Open Space and Addressing Deficiency' P have been consulted to establish if any areas of open land not currently designated as MOL are large enough to be considered to be, as a minimum, of metropolitan significance. However, as illustrated in **Figure 3.8**, all open spaces at this level of the open space hierarchy are already designated as MOL or Green Belt. It is therefore considered that all open spaces making a significant contribution to the physical structure of London or contain open air facilities which serve either the whole or significant parts of London have already been designated as either MOL or Green Belt.

### Open land containing features or landscapes of either national or metropolitan value

- 3.28 A comprehensive range of historic, ecological and landscape features of national and metropolitan value have been reviewed to establish whether there are any pockets of open space not currently designated as MOL which could qualify due to the presence of national and metropolitan features that require the maintenance of openness. The historic, ecological and landscape features of national and metropolitan value considered include:
- Historic listed buildings.
  - Historic Registered Parks and Gardens.
  - Historic Registered Battlefields.
  - World Heritage Sites.
  - Historic Scheduled Monuments.
  - Metropolitan Sites of Importance for Nature Conservation (SINCs).
  - National Nature Reserves.
  - Sites of Special Scientific Interest.
  - European Natura 2000 Sites including Special Areas of Conservation, Special Protection Areas, Sites of Community Importance and Ramsar Sites.
  - Ancient Woodland.
  - National Areas of Outstanding Natural Beauty.
- 3.29 Only two pockets of open land currently not designated as MOL or Green Belt are covered by any of these designations and can therefore be considered for designation as MOL. These are the two areas of ancient woodland located to the north of Hampstead Heath:
- **Big Wood** is a Site of Borough Importance for Nature Conservation and is managed as a public nature reserve of a scale considered to be of local importance. Big Wood forms part of one of the Borough's Green Chains linking Hampstead Heath to the south with the Dollis Valley which runs through the centre of the Borough up on to the Barnet Plateau. The wood covers approximately 7.3 hectares.
  - **Turner's Wood** is a Site of Borough Importance for Nature Conservation and is managed as a private nature reserve, it is approximately 3 hectares in size.
- 3.30 **Figure 3.8** illustrates the location of these open spaces within the Borough and the wider green infrastructure network.

### Open land forming part of a green chain or link in the network of green infrastructure and meets one of the other criteria

- 3.31 The London Borough of Barnet contains two successful Green Chains/Links designated as MOL in London – the Dollis Link and the Pymmes Brook Link. The Mayor of London's 'Supplementary Planning Guidance of Green Infrastructure and Open Environments: The All London Green Grid' highlights the value of both as 'Strategic Corridors/Links':
- *"The Dollis Link connects large open spaces of real distinctiveness and biodiversity, linking Moat Mount Open Space in the Green Belt to the Brent Valley via the Folly Brook and Riverside Walk Gardens and onwards to Hampstead Heath. The northern part runs through farmland and playing fields, with the lower reaches providing a green corridor through the built up area,*

*where some sections are culverted. The Dollis Valley Greenwalk connects these open spaces and links in to the London LOOP and Capital Ring strategic walks.”*

- *“The Pymmes Brook Link follows a small tributary from Pickett’s Lock on the River Lee out to Monken Hadley Common in the Green Belt. The Pymmes Brook Trail links with the London LOOP in the north and the Lee Valley Walk in the south, passing through a number of parks, including Oak Hill, Brunswick, Arnos and Pymmes. The trail follows the waterway along most of its course but goes through the urban area in several areas, including crossing the A10.”*

3.32 The only other recognised Strategic Link within the Borough is the Silk Stream and Edgeware Brook Link which runs from the green spaces around the Brent Reservoir through suburban development to the large open spaces on the urban fringe at Stanmore. However, the open land along this chain is not designated as MOL. This is attributed to the fact that the largest pockets of open space along the link, including Montrose Playing Fields, Silk Stream Park, Watling Park, Lyndhurst Park and Rushgrove Park do not contain any national or metropolitan features and are not of a significant enough in size to be recognised as contributing to the physical structure of London or as open air facilities serving the whole or significant parts of London. The most significant designations within these parks are of local and borough significance including the Silk Stream Site of Borough Importance for Nature Conservation. Furthermore, significant sections of the link are not accessible.

### **Open Green Belt land that meets the MOL Criteria**

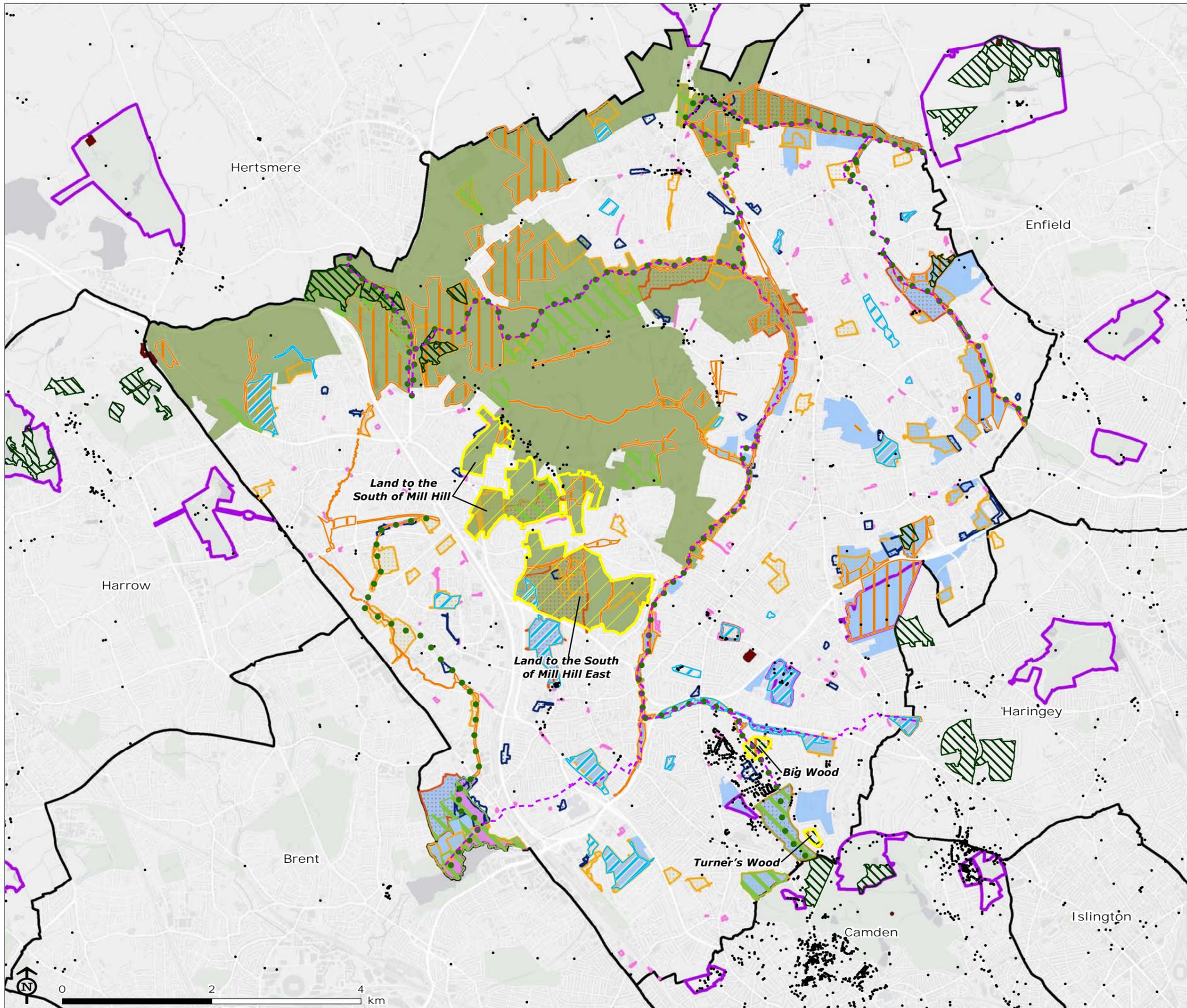
3.33 In addition to the open land within the Borough that is not currently designated as MOL or Green Belt, there are two notable pockets of largely open Green Belt land which are isolated from the wider open countryside and are therefore not part of a continuous pattern of open land surrounding London:

- The open Green Belt **land to the south of Mill Hill East** containing Hendon Cemetery and Crematorium, the Allianz Park Stadium and associated Cophall playing fields, Metro Golf Centre, Chase Lodge School Playing Field and Powerleague Millhill and associated playing fields is completely isolated from the wider open countryside by several residential streets emanating from Bittacy Hill Road, Devonshire Road and Milesplitt Hill Road, Pursley Road and Wise Lane. In addition to the open spaces the area contains two Sites of Importance for Nature Conservation – Cophall South Fields SINC of local importance and the woodland associated with and surrounding the Metro Golf Centre, which is recognised to be of borough importance. This area of Green Belt, not including areas of development, is approximately 135 hectares in size.
- The open Green Belt **land to the south of Mill Hill** containing Mill Hill Cemetery, Mill Hill School playing fields and associated grounds, Arrandene Open Space, Mill Hill Park, Mill Hill Abbey grounds, St Joseph’s College grounds is isolated from the wider open countryside by the developed, largely historic land along The Ridgeway. In addition to the open spaces the area contains three Sites of Importance for Nature Conservation – two of borough importance (Drivers Hill Nature Reserve and The Mill Field) and one of metropolitan importance (Arrandene Open Space). This area of Green Belt, not including areas of development, is approximately 113 hectares in size.

3.34 Both pockets merit consideration for re-designation as MOL by virtue of the fact that they are no longer contiguous with the open Green Belt land surrounding London. In addition, both pockets represent significant areas of open land that contribute to the physical structure of London and contain a diverse range of open spaces which in isolation are of borough importance, but in combination could be considered to be of at least metropolitan significance. **Figure 3.8** illustrates the location of these open spaces within the Borough and the wider green infrastructure network. A more detailed version of **Figure 3.8** is provided in **Appendix 4** for reference.

Barnet Green Belt and MOL Assessment

Figure 3.8  
Potential New MOL



- Local Authority Boundary
- Greenbelt
- MOL
- Potential New MOL
- Metropolitan Walk
- Green Chain
- Scheduled Monument
- Registered Park and Garden
- Site Of Special Scientific Interest
- Ancient Woodland Inventory
- Listed Building
- SINCs**
- Metropolitan
- Borough
- Local
- Parks and Open Spaces**
- District Park
- Local Park or Open Space
- Small Open Space
- Pocket Park

Map Scale @A3: 1:50,000



## 4 Green Belt and MOL Enhancement

### Planning Policy Context

- 4.1 Paragraph 138 of the NPPF states that if local planning authorities decide to release Green Belt land, plans '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'. Paragraph 141 of the NPPF also states that 'local planning authorities should plan positively to enhance their beneficial use, 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'.
- 4.2 This national planning policy is supported by the London Plan. The supporting text in draft Policy G3 in the new Draft London Plan (2018) 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.
  - The principle of replacing the loss of a designated area of MOL with designation of a new area of MOL elsewhere could be applied to MOL where the resulting MOL meets at least one of the MOL criteria.
- 4.3 The London Borough of Barnet has yet to establish whether the exceptional circumstances exist to remove land from the Green Belt and MOL. Therefore, at this stage in the plan-making process, it is not possible to establish whether 'compensatory improvements' or in the case of MOL new areas of MOL will be required to 'offset' loss or harm to Green Belt and/or MOL. There is however significant opportunity to use the Borough's new Local Plan to plan positively and enhance the beneficial uses and environmental assets of the Borough's Green Belt and MOL.

### Barnet's Open and Green Spaces

- 4.4 Barnet is an outer London borough and, although some areas in the southern part of the borough are relatively dense and urban in character, the borough is generally renowned for its green, leafy and attractive suburban neighbourhoods and open spaces, which range from Hampstead Heath in the south to open countryside, woodlands and farms in the north of the borough.
- 4.5 Barnet is one of the greenest boroughs in London with a large proportion of the area within its boundary lying in the Green Belt (2,466 hectares – 28% of the borough), and Metropolitan Open Land (690 hectares – 8% of the borough).
- 4.6 The borough has over 200 parks and open spaces, covering 848 hectares. Within the traditional suburbs, smaller areas of open space contribute to the green and leafy character of built up areas and provide residents with important local opportunities for leisure and recreation. All these open spaces help to define the character of the borough and contribute significantly to Barnet's unique identity, quality of life and social and economic well-being. Barnet's open spaces are an important element of the Borough's character and careful protection of these assets is fundamental to the borough's spatial planning vision.
- 4.7 The Barnet Public Open Space Strategy (POSS) identified the need to create new parks to address deficiencies in provision and developing of distinctive parks that reinforce the identity of neighbourhoods. It states that c£20m investment in new high quality green spaces will be incorporated within seven of the Council's eight regeneration and intensification areas (Dollis Valley, Mill Hill East, Granville Road, Brent Cross / Cricklewood, West Hendon, Colindale, Stonegrove / Spur Road and Grahame Park). It is anticipated that more of this investment will be spent in the south and west of the Borough where the population growth will be greatest over the

next 20 years. The POSS also includes reference to Green Belt in the context of the All London Green Grid and the aspiration for the establishment of a new regional park within Barnet by 2026.

## General Opportunities to Improve the Green Belt and MOL

4.8 Potential enhancement of beneficial use could include:

- **Improving access** – enhancing the coverage and condition of the rights of way network and increasing open access provision.
- **Providing facilities that outdoor sport and recreation** – which maintain openness.
- **Landscape and visual enhancements** – using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced
- **Increasing biodiversity** – most open land has potential for increased biodiversity value – e.g. the management of hedgerows and field margins, and provision of habitat connectivity.
- **Improving damaged and derelict land** – giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to its designation as Green Belt or MOL.

## The All London Green Grid

4.9 The Mayor of London's 'Supplementary Planning Guidance of Green Infrastructure and Open Environments: The All London Green Grid' (ALGG) is a policy framework published by the Greater London Authority to promote the design and delivery of 'green infrastructure' across London<sup>23</sup>.

4.10 The ALGG aims to:

- Increase access to open space.
- Conserve landscapes and the natural environment and increase access to nature.
- Adapt the city to the impacts of climate change.
- Make sustainable travel connections and promote cycling and walking.
- Encourage healthy living.
- Promote sustainable food growing.
- Enhance visitor destinations and boost the visitor economy.
- Promote green skills and sustainable approaches to design, management and maintenance.

4.11 Eleven Area Frameworks have been produced which expand on the strategic opportunities set out in the ALGG Supplementary Planning Guidance. The Area Frameworks establish a comprehensive baseline understanding of each area, define a vision, area objectives and strategic opportunities for each area. The vast majority of the London Borough of Barnet falls within the 'Brent Valley & Barnet Plateau Area Framework'.<sup>24</sup>

## Opportunities to Enhance Barnet's Green Belt and MOL

4.12 The Brent Valley and Barnet Plateau Area Framework contains the following notable objectives which promote the enhancement of the Borough's Green Belt and MOL:

- Increase access to open space, the Green Belt and the urban fringe.
- Conserve landscape and the natural environment and increase access to nature.

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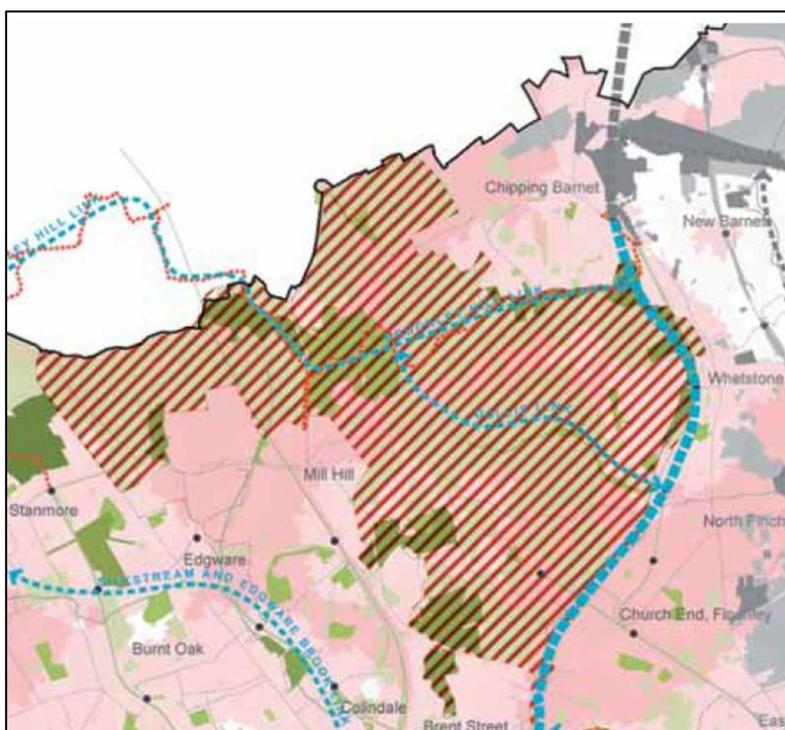
<sup>23</sup> <https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid>

<sup>24</sup> <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/all-london-green-grid-and-area-frameworks>

- Adapting to climate change.
- Making sustainable travel connections.
- Enhancing distinctive visitor destinations and boosting the visitor economy.
- Promoting healthy living.
- Promoting sustainable food production.

4.13 The objectives include the aspiration to create a new 'Regional Park' within the Borough – a future strategic open space created by linking existing quality greenspaces, managing and promoting them as a collective entity to be funded and managed. The source of this idea was the All London Green Grid, a policy framework promoting the design and delivery of Green Infrastructure across London (published March 2012)<sup>25</sup>. **Figure 4.1** shows the location of the proposed regional park within the London Borough of Barnet.

**Figure 4.1: Location of ALGG Regional Park within the London Borough of Barnet<sup>26</sup>**



4.14 In addition, the Brent Valley and Barnet Plateau Area Framework contains a detailed list of projects organised into clusters. Notable project clusters which overlap with the London Borough of Barnet's Green Belt and MOL include:

- 11.4 – **Green Belt**: highlights the woodland, farms and recreational uses on the high ground of the Barnet Plateau and promotes cooperative working amongst Boroughs and private landowners to deliver open space management and increase public awareness of the Green Belt's value.
- 11.5 – **Colindale**: highlights the pressure on parks and open spaces in the area to meet the needs of new large mixed use developments, existing flood risk and low levels of biodiversity, which all need to be addressed.
- 11.6 – **Finchley Ridge**: highlights the pressure on parks and open spaces in the area to meet the needs of new large mixed use developments and promotes the delivery of new parks and the strengthening of links between the Borough's existing recreation grounds, the Dollis Trail and the Green Belt.
- 11.7 – **Dollis Stream/Valley**: highlights the value of this ten mile riparian corridor extending from the Green Belt to Brent Cross.

<sup>25</sup> Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. March 2012.

<sup>26</sup> Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. March 2012.

- 4.15 As part of implementation of Barnet's Parks and Open Spaces Strategy and Playing Pitch Strategy, agreed in 2016 and 2017 respectively, a number of master plans are being developed to identify the specific enhancements required to improve the chosen sites<sup>27</sup>. The master plans are at various stages in the development process. Planned master plans containing land within the Borough's Green Belt and MOL include:
- Copthall Sports Hub & Mill Hill Open Spaces.
  - West Hendon Playing Fields and Associated Community Facilities.
  - Barnet Playing Fields and King George V Playing Fields.
- 4.16 The Council should continue to build on the progress that has been made since the publication of the ALGG Area Frameworks and work with neighbouring authorities, local communities and landowners to provide the planning policy and funding framework to deliver some of the more ambitious and strategies projects listed in the ALGG, notably the creation of the Regional Park.
- 4.17 Finally, although the Silk Stream and Edgware Brook Link is not considered to be appropriate for designation as MOL in its current condition, significant enhancement measures could help to build the case for its future designation as MOL. Notable enhancement measures include:
- Maximisation of accessibility along the full length of the chain, for example along the railway line at Colindale, would significantly improve connectivity and therefore its strategic function as a Green chain/link.
  - Significant investment into the existing open spaces through the provision of new and improved outdoor sport and recreation facilities would help strengthen the strategic significance of the current open spaces from small and local open spaces to spaces of metropolitan significance.
  - Significant enhancement of the Sites of Nature Conservation Importance (SINCs) along the chain would help to increase biodiversity, resilience and the sites strategic function.
- 4.18 Improvement to the beneficial uses of Green Belt and MOL could be secured through S106 agreements in conjunction with the release of designated land and consent for development. Even if this does not occur, S106 contributions could be pooled from developments outside Green Belt or MOL, where a link can be demonstrated between the development and the area of land.
- 4.19 Additionally, specific site allocation policies could include enhancement measures.
- 4.20 Finally, the Borough's Infrastructure Delivery Plan could identify the need for Community Infrastructure Levy funding to enhance green infrastructure within the Green Belt or MOL.

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<sup>27</sup> <https://www.barnet.gov.uk/citizen-home/news/Consultation-to-start-on-Barnet-s-Parks-and-open-spaces.html>

## 5 Conclusions and Next Steps

- 5.1 This Stage 1 Green Belt and MOL study is an important part of the London Borough of Barnet's Local Plan evidence base. The study highlights variations in the contribution of Green Belt land to the Green Belt purposes, notably areas that perform relatively weakly, and variations in the openness of MOL, notably areas of relatively weak openness.

### Green Belt Stage 1 Conclusions

- 5.2 The vast majority of the Green Belt within the London Borough of Barnet continues to serve its purposes very well, safeguarding the identity of Barnet and Greater London by maintaining the openness of the countryside. However, there are several pockets of Green Belt adjacent to the existing urban edges which make a weak or relatively weak contribution to the majority of the Green Belt purposes.
- 5.3 In addition, there are several potential minor boundary adjustments which could be made to the existing Green Belt boundary GIS data layer held by the council, to correct digitisation errors and realign boundaries along more permanent readily recognisable features.
- 5.4 The existing edge of the Green Belt within and bordering Barnet does not border any significant areas of open land that are currently not designated as Green Belt. Therefore, it is considered that there are no suitable locations for strategic extensions to the Metropolitan Green Belt within and adjacent to the Borough.

### MOL Stage 1 Conclusions

- 5.5 The vast majority of the MOL within the London Borough of Barnet is open, helping to maintain and protect the functions, Green Links and features they contain, as well as the physical structure of London. A significant proportion of the MOL within the Borough contains buildings and structures which compromise openness to varying degrees. However, the majority are of a relatively small scale and have a use which supports the use of the MOL as open space. The supporting text to Policy 7.17 of the adopted London Plan (2011) states that small scale supporting uses are appropriate in MOL. Consequently, although buildings and structures within MOL may affect openness, their use and scale are likely to make them inappropriate candidates for removal from the designation.
- 5.6 In addition, there are several potential minor boundary adjustments which could be made to the existing MOL boundary GIS data layer held by the Council, to correct digitisation errors and realign boundaries along more permanent readily recognisable features.
- 5.7 Only two pockets of open land currently not designated as MOL or Green Belt are considered to have potential for designation as MOL – both contain ancient woodland located to the north of Hampstead Heath:
- **Big Wood** is a Site of Borough Importance for Nature Conservation and is managed as a public nature reserve of a scale considered to be of local importance. Big Wood forms part of one of the Borough's Green Chains linking Hampstead Heath to the south with the Dollis Valley which runs through the centre of the Borough up on to the Barnet Plateau. Big Wood covers approximately 7.3 hectares.
  - **Turner's Wood** is a Site of Borough Importance for Nature Conservation and is managed as a private nature reserve, it is approximately 3 hectares.
- 5.8 In addition to the open land within the Borough that is not currently designated as MOL or Green Belt, there are two notable pockets of largely open Green Belt land which are isolated from the

wider open countryside and are therefore not part of a continuous pattern of open land surrounding London.

- The open Green Belt **land to the south of Mill Hill East** containing Hendon Cemetery and Crematorium, the Allianz Park Stadium and associated Cophall playing fields, Metro Golf Centre, Chase Lodge School Playing Field and Powerleague Millhill and associated playing fields is completely isolated from the wider open countryside. This area of Green Belt covers approximately 135 hectares.
- The open Green Belt **land to the south of Mill Hill** containing Mill Hill Cemetery, Mill Hill School playing fields and associated grounds, Arrandene Open Space, Mill Hill Park, Mill Hill Abbey grounds, St Joseph's College grounds is isolated from the wider open countryside by the developed, largely historic land along The Ridgeway. This area of Green Belt covers approximately 113 hectares.

5.9 Therefore, they have potential for re-designation as MOL.

## Next Steps

### Altering Green Belt Boundaries

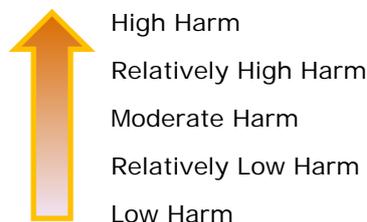
- 5.10 Paragraph 136 of the NPPF states that 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.' Paragraph 137 of the NPPF states that before concluding that exceptional circumstances exist local authorities should be able to demonstrate that all other reasonable options for meeting its identified need for development have been considered, including:
- suitable brownfield sites and underutilised land;
  - optimising the density of development; and
  - discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
- 5.11 Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt for development 'plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They (plans) 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.' In addition, the paragraph states that 'when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.'
- 5.12 Furthermore, notable case law provides further guidance on the matter, specifically *Calverton Parish Council v Greater Nottingham Councils & others* (2015) which 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.
- 5.13 Establishing a sustainable pattern of development through the examination of all reasonable alternatives is most effectively and efficiently defined through Council's Sustainability Appraisals.
- 5.14 This Stage 1 report will help the Council to define the reasonable options for delivering growth that should be considered and appraised through its plan-making process. If required, Stage 2 of the study (details for which are provided below) will establish the potential harm generated by any specific development options in the Green Belt and recommend ways that harm might be avoided and/or minimised.
- 5.15 Once the Council has appraised all reasonable options set out in paragraph 137 and 138 and defined a preferred spatial strategy for growth that promotes a sustainable pattern of development, the Council will be in a position to judge whether the nature and extent of harm to the Green Belt generated by the preferred spatial strategy is outweighed by the benefits of the development.

## Altering MOL Boundaries

- 5.16 The supporting text to draft Policy G3 in the new Draft London Plan (2018) 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.

## Stage 2 Assessment of Green Belt and MOL Harm

- 5.17 LUC has a tried and tested methodology for assessing the harm of releasing Green Belt and MOL, which considers how harm can be minimised in specific locations. Should the Council identify any reasonable options for development within the plan period or safeguarding beyond the plan period, this methodology can be employed as part of a Stage 2 study.
- 5.18 Three key factors inform the assessment of harm:
- **The contribution of the area to the NPPF Green Belt Purposes or MOL openness across the area of potential release/development.**
  - **The potential implications of the loss of openness within the area of potential release/development for the integrity of the wider Green Belt/MOL.** This is important as whilst an area / site may not make a significant contribution to the Green Belt or be particularly open MOL in its own right, its location within the Green Belt/MOL may have the potential to affect neighbouring Green Belt/MOL and the wider integrity / strategic functioning of the designations.
  - **Consistency and strength of the Green Belt/MOL boundary/urban edge in relation to the potential area of Green Belt/MOL release/development.** For example, if the current designation edge forms part of a consistent boundary, e.g. defined by the same readily recognisable element, and creating a new boundary would result in a longer, more varied edge, there could be potentially greater harm to the designations.
- 5.19 The relationship between these three factors can vary significantly from across a study area. Professional judgement is used to rate Green Belt/MOL harm using a 5-point scale:



- 5.20 Where there are variations in the three factors influencing Green Belt/MOL harm across an area / site it is possible to consider how harm might be minimised by releasing / developing smaller areas of land or through the implementation of mitigation measures<sup>28</sup>. Furthermore, following the definition of preferred site allocations within the Green Belt/MOL, it is possible to consider what the harm of multiple releases/developments within the designations would be in combination.

## Green Belt and MOL Enhancement

- 5.21 There is significant opportunity to use the Borough's new Local Plan to plan positively and enhance the beneficial uses and environmental assets of the Borough's Green Belt and MOL in line with the national planning policy, the London Plan and All London Green Grid.
- 5.22 The Council should continue to build on the progress that has been made since the publication of the ALGG Area Frameworks and work with neighbouring authorities, local communities and landowners to provide the planning policy and funding framework to deliver some of the more ambitious and strategies projects listed in the ALGG, notably the creation of the Regional Park.

<sup>28</sup> The potential to reduce harm through the sensitive scaling, design and landscaping of developments can only be considered in detail when a specific development proposal can be assessed. Without a clear definition of the scale, type and design of development which will come forward for development within a specific Green Belt or MOL location, the harm assessment is based on the assumption that the openness of a defined area will be lost. This approach ensures a consistent approach is adopted across the study area.

- 5.23 Improvement to the beneficial uses of Green Belt and MOL could be secured through S106 agreements in conjunction with the release of designated land and consent for development. Even if this does not occur, S106 contributions could be pooled from developments outside Green Belt or MOL, where a link can be demonstrated between the development and the area of land.
- 5.24 Additionally, specific site allocation policies could include enhancement measures.
- 5.25 Finally, the Borough's Infrastructure Delivery Plan could identify the need for Community Infrastructure Levy funding to enhance green infrastructure within the Green Belt or MOL.

# **Appendix 1**

## Green Belt and MOL Policy and Guidance

## Origins of the Metropolitan Green Belt

- 6.1 Barnet'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 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.
- 6.2 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*".
- 6.3 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 Hampstead Heath, Epping Forest and Kenley Common.
- 6.4 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.
- 6.5 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.
- 6.6 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.
- 6.7 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.
- 6.8 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).
- 6.9 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012<sup>29</sup>. The Government published the revised NPPF in July 2018 and this document currently provides national Green Belt policy. The current and evolving Green Belt position of the Government in relation to Green Belt provided through the NPPF is detailed later in this report.

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<sup>29</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)

- 6.10 The Greater London Development Plan (GLDP)<sup>30</sup>, approved in 1976, defined the full extent of the London Metropolitan Green Belt, including within Barnet. 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”.
- 6.11 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>31</sup>.

## Origins of Metropolitan Open Land

- 6.12 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.
- 6.13 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’.
- 6.14 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>32</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>33</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’.
- 6.15 This general approach has been carried forward into the current London Plan<sup>34</sup> (adopted in 2011), which replaced RPG3. A new Draft London Plan has been published for consultation by the Greater London Authority (GLA). The London Plan affords the same level of protection to MOL as to the Green Belt, making national Green Belt policy, set out 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.

<sup>30</sup> Greater London Council, 1976, Greater London Development Plan

<sup>31</sup> GIS data from the Department for Communities and Local Government, 2017

<sup>32</sup> London Planning Advisory Committee, 1994, Advice on Strategic Planning Guidance for London

<sup>33</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>34</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)

## National Planning Policy

- 6.16 Government policy on Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)<sup>35</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'*.
- 6.17 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.

- 6.18 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.'*
- 6.19 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.'
- 6.20 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 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>36</sup>

<sup>35</sup> Department of Communities and Local Government, 2018, 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>36</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.

- 6.21 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.
- 6.22 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.
- 6.23 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).
- 6.24 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.
- 6.25 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."
- 6.26 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:
    - 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.'
- 6.27 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.'

## London Planning Policy

### Green Belt Policy

- 6.28 The positive role of the Green Belt is reflected in the adopted London Plan (2011)<sup>37</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."
- 6.29 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.

### *New Draft London Plan*

- 6.30 Public consultation on a new draft London Plan<sup>38</sup> took place between December 2017 and March 2018.
- 6.31 The adopted Green Belt Policy 7.16 has been replaced by Policy G2. There are no material changes to the policy, which is consistent with national Green Belt policy.

### Metropolitan Open Land Policy

- 6.32 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 of 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.
- 6.33 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.
- 6.34 The supporting text to the London Plan MOL Policy 7.17 states:

<sup>37</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>38</sup> Mayor of London, 2017, The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation [online] available at: [https://www.london.gov.uk/sites/default/files/new\\_london\\_plan\\_december\\_2017.pdf](https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf)

- 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.

### *New Draft London Plan*

6.35 Public consultation on a new draft London Plan<sup>39</sup> took place between December 2017 and March 2018. Draft Policy G3 in the Draft London Plan has the following differences to the current adopted Policy 7.17 (2011):

- 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.
- The supporting text to Draft Policy G3 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. The principle of replacing the loss of a designated area with designation of a new area of MOL elsewhere could be applied to MOL where the resulting MOL meets at least one of the MOL criteria.
- 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.

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

6.36 Both the adopted Policy 7.17 (2011) and the new Draft Policy G3 (2018) tie the principles of national Green Belt policy to London's MOL, including the Green Belt purposes.

6.37 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>40</sup> (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 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 Green Belt 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 Barnet.

6.38 The following other principles of national Green Belt policy are applicable to MOL planning<sup>41</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:

<sup>39</sup> Mayor of London, 2017, The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation [online] available at: [https://www.london.gov.uk/sites/default/files/new\\_london\\_plan\\_december\\_2017.pdf](https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf)

<sup>40</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.

<sup>41</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.

- 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;
  - 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).

## Other Relevant Guidance and Case Law

### Planning Advisory Service Guidance

- 6.39 Neither the National Planning Policy framework (NPPF) nor National Planning Practice Guidance (NPPG) 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.
- 6.40 The PAS Guidance<sup>42</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.
- 6.41 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>42</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.

- 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'.

6.42 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>43</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

6.43 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>44</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."
  - 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

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<sup>43</sup> <http://www.pas.gov.uk/pm-q-a-green-belt#Q: When should you carry out a Green Belt review?>

<sup>44</sup> Note: case references to the NPPF before July 2018 refer to policy within the original NPPF published in March 2012.

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*”.

### Planning Appeal Decisions

- 6.44 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 and by association MOL policy.<sup>45</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 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*

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<sup>45</sup> Note: case references to the NPPF before July 2018 refer to policy within the original NPPF published in March 2012.

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.

## Barnet Local Plan

- 6.45 The Barnet Local Plan replaced the Borough's adopted Unitary Development Plan (UDP) in 2012. The Borough's Green Belt and MOL were not reviewed in the process of the preparation of the current adopted Barnet Local Plan.
- 6.46 The Borough is currently preparing a new Local Plan. This will be a single Local Plan document that will shape the future of Barnet as a place and will provide the overarching local policy framework for delivering sustainable development. The Local Plan will look ahead to 2036 and will integrate strategic policies, development management policies and site proposals. Once adopted the new Local plan will replace the Core Strategy and Development Management DPDs.
- 6.47 This study will form part of the evidence base for the new Local Plan, helping to inform the definition of new Green Belt and MOL policy.

### Core Strategy DPD

- 6.48 Barnet's spatial development priorities are defined in the Core Strategy DPD<sup>46</sup> through the 'Three Strands Approach'. Strand one of this approach seeks absolute protection of the Green Belt and MOL from inappropriate development. This approach is reflected in Policy CS1, which requires consolidated growth in Barnet to be complemented by the protection of Green Belt and MOL. Policy CS7 in the Core Strategy aims to make Barnet a greener Borough by ensuring positive management of Green Belt and MOL to provide improvements in overall quality and accessibility.

### Development Management Policies DPD

- 6.49 The Development Management Policies DPD<sup>47</sup> sets out the policy for delivering the long-term spatial vision and strategic place-shaping objectives set out in Barnet's Core Strategy. Policy DM15 in this DPD reiterates the guidance found within the NPPF and London Plan regarding Green Belt and MOL. The policy states that the Council will refuse any development in the Green Belt or MOL that is not compatible with their purposes and objectives and does not maintain openness. Buildings in the Green Belt or MOL are inappropriate unless they are used for: (1) agriculture, horticulture and woodland; (2) nature conservation and wildlife use; or (3) essential facilities for appropriate uses that do not have an adverse impact on the openness of Green Belt or MOL.

### Area Action Plans

- 6.50 The Colindale Area Action Plan<sup>48</sup> (AAP), prepared in 2009, sets out the framework for future development and change in the Colindale area. Covering an area of approximately 200ha the Colindale AAP takes a spatial approach to forward planning of the area, identifying corridors of change and providing detailed and flexible planning and design policy and guidance.
- 6.51 The Mill Hill East AAP<sup>49</sup> was also adopted in 2009. It covers a total area of approximately 48 hectares. The aim of the AAP is to ensure development takes place in a balanced and coordinated manner.

### Neighbourhood Plans

- 6.52 Two areas within Barnet are in the early stages of the development of a Neighbourhood Plan: Mill Hill and West Finchley. Both areas contain Green Belt although the area of Green Belt in West Finchley is only small, bordering Mill Hill at the Dollis Brook.

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<sup>46</sup> London Borough of Barnet, Core Strategy DPD, 2012 [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/core-strategy.html>

<sup>47</sup> London Borough of Barnet, Development Management Policies DPD, 2012 [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/core-strategy.html>

<sup>48</sup> London Borough of Barnet, 2010, Colindale Area Action Plan [online] available at: <https://barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/local-plan/colindale-aap.html>

<sup>49</sup> London Borough of Barnet, 2009, Mill Hill East Area Action Plan [online] available at: <https://barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/local-plan/mill-hill-east-aap.html>

## Neighbouring Authority Green Belt and MOL Reviews

### London Borough of Brent

- 6.53 Brent does not contain any land designated as Green Belt. However, many of the Borough's parks, sports facilities, nurseries, allotments, cemeteries, waterways, areas of nature conservation, woodlands, golf courses, public and private open space and playing fields are designated as MOL.
- 6.54 Current protection for MOL is set out in the Borough's adopted Core Strategy and Development Management Plan<sup>50</sup>. Core Strategy policy CP18 requires open space of local value to be protected from inappropriate development and to be preserved for the benefit, enjoyment, health and wellbeing of Barnet's residents, visitors and wildlife. Development Management policy DMP8 states that 'Green chains and wildlife corridors will be protected from development which would compromised its biodiversity or recreational function'.
- 6.55 The London Borough of Brent has not published a MOL review.

### London Borough of Camden

- 6.56 Camden does not contain any land designated as Green Belt. However, the Borough does contain MOL. MOL is protected through Policy A2 of the Borough's Local Plan<sup>51</sup>. Policy A2 states that '*The Council will protect, enhance and improve access to Camden's parks, opens spaces and other green infrastructure*', while maintaining the openness and character of Metropolitan Open Land.

### London Borough of Enfield

- 6.57 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.
- 6.58 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 Haringey

- 6.59 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.
- 6.60 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 Harrow

- 6.61 The London Borough of Harrow contains both Green Belt and MOL. However a review of the designations has not been undertaken in recent years. However, a Green Belt Management Strategy<sup>54</sup> (2006-2011) has been published. The aims of this document were to: provide a framework to guide future decision on the protection and management of the Green Belt; help to

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<sup>50</sup> London Borough of Brent, 2010, Core Strategy [online] available at: <https://www.brent.gov.uk/media/16404211/core-strategy-small.pdf>

<sup>51</sup> Camden Council, Camden Local Plan, 2017 [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>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 of Harrow and Land Use Consultants 2005, Harrow's Green Belt Management Strategy

cater for the recreational needs of Harrow's residents and visitors and to make Harrow a more attractive place to live and work.

- 6.62 Policy protection for the Borough's Green Belt and MOL is set out in the Borough's Development Management DPD<sup>55</sup>. Development management policy DM16 accords with the NPPF and the London Plan and states that for previously developed sites in the Green Belt '*proposals for inappropriate redevelopment or which, for other reasons, would harm the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.*' Development management Policy DM17 supports the beneficial use of the Green Belt and MOL, stating that this will be supported where the use would not harm the openness of the designations. Proposals for uses which would harm the Green Belt or MOL will be refused in the absence of clearly demonstrated very special circumstances.

### **Hertsmere Borough Council**

- 6.63 Hertsmere Borough Council's Green Belt is in the process of being reviewed as part of the preparation of the Borough's new Local Plan. A two-staged approach is being undertaken. Stage 1 comprises the rating of 'strategic area' parcels against each Green Belt purpose (except purpose 5), followed by the identification of sub-areas for further analysis at Stage 2. The stage 2 assessment includes consideration of the effects of the release of sub-areas of Green Belt on the wider Green Belt. The methodology states that the assessment parcels may include Green Belt in neighbouring local authority areas where appropriate. Hertsmere Borough is not a London Borough and therefore does not contain any MOL.

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<sup>55</sup> Harrow Council 2013, Development Management Policies [online] available at:  
[http://www.harrow.gov.uk/info/856/local\\_plan/609/development\\_management\\_policies](http://www.harrow.gov.uk/info/856/local_plan/609/development_management_policies)

## **Appendix 2**

### London Borough of Barnet Relevant Environmental and Planning Context

## Metropolitan Green Belt

- 7.1 The London Borough of Barnet contains roughly 2,466 hectares of Green Belt land, which represents around 7% of the Green Belt in Greater London and 0.5% of the total area of land covered by the London Metropolitan Green Belt. Barnet's Green Belt covers around 28% of the Borough's total area<sup>56</sup>.
- 7.2 **Figure A2. 1** shows the extent of the London Metropolitan Green Belt to the north of London and the London Borough of Barnet's place within it. **Figure A2. 2** shows the Green Belt within the Borough of Barnet. The majority of the Green Belt land is located in the centre of the Borough surrounded by towns and villages which now form part of the built up area of Greater London, such as Arkley, Barnet, Edgware, Finchley and Totteridge. This central area of Green Belt within the Borough is connected to the wider Green Belt by the open countryside in between Arkley and Edgware and Borehamwood in the north west of the Borough. The Green Belt then follows the northern edge of the Greater London urban area close to the northern edge of the Borough, adjoining the Green Belt land in the neighbouring London Boroughs of Enfield to the east and Harrow to the west. The Green Belt to the north of the Borough lies within the Borough of Hertsmere outside of Greater London. The Green Belt land to the south of Mill Hill containing Hendon Cemetery, Hendon Golf Course and Copthall Sports Centre is separated from the wider Green Belt.
- 7.3 The Borough's Green Belt is predominantly open countryside in agricultural use, but also contains other land uses and their associated development:
- Golf courses
  - Parks
  - Playing fields, including school playing fields
  - Woodland, including pockets of ancient woodland at Scratchwood Open Space, Moat Mount and Barnet Gate Wood. Scratchwood and Moat Mount Open Space fall within Watling Chase Community Forest.
- 7.4 The agricultural areas are located towards the centre of the designated Green Belt in the Borough, away from the urban areas, whereas the golf courses, playing fields and parks are more commonly located close to the urban edges.
- 7.5 There are also several pockets of development at varying densities and scales which are 'washed over' by Green Belt. The most significant pockets include:
- Along The Ridgeway (road) north of Mill Hill schools, detached and semi-detached dwellings, larger apartment buildings and the site of the former National Institute for Medical Research sit within the Green Belt and the Mill Hill Conservation Area;
  - Along Highwood Hill Road and Totteridge Common Road to the west of Totteridge detached dwellings and farm buildings sit within the Green Belt and the Totteridge Conservation Area;
  - North and south of Lullington Garth Road in between Mill Hill East and Woodside Park the London Equestrian Centre, Frith Manor Equestrian Centre and Frith Manor Primary School sit within the Green Belt;
  - East and west of the A1 to the south of Barnet Road (A411) and Borehamwood at Stirling Corner two distinct pockets of residential development arranged around a series of cul-de-sacs, a petrol station and large public house sit within the Green Belt;
  - West of Barnet Gate to the north and south of Barnet Road (A411) and west of Hendon Wood Lane several large dwellings sit within the Green Belt set back from the roads;
  - North west of High Barnet along the western side of Galley Lane several large dwellings and the Poor Clare Monastery set back from the road sit within the Green Belt;
  - West of Hadley Wood along the northern side of Camlet Way several large dwellings and two schools sit within the Green Belt set back from the road sit within the Green Belt; and,

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<sup>56</sup> London Borough Barnet, 2009, Open Space, Sports and Recreational Facilities Assessment.

- North of High Barnet and east of Monken Hadley along Dury Road, Hadley Green Road and Hadley Wood Road sits the historic core of Monken Hadley, include many large dwellings and a church within the Green Belt. Much of this Green Belt land sits within a Conservation Area as well as on the site of the Battle of Barnet, which is a nationally designated Registered Battlefield.

## Metropolitan Open Land

- 7.6 As shown in **Figure A2. 2**, many of the Borough's open spaces are designated as Metropolitan Open Land (MOL). Located within the built-up area of the Borough, almost all of the MOL in Barnet is located in the south and east of the Borough. Together these designated open spaces cover 690ha of land, which equates to 8% of the total area of the Borough.
- 7.7 The Borough's areas of MOL have a broad range of land uses, most notably:
- Parks
  - Cemeteries
  - Allotments
  - Golf courses
  - Playing fields
  - Registered Parks and Gardens
  - Woodland
- 7.8 A number of areas of MOL are wholly or in part designated as Sites of Importance for Nature Conservation. The majority of the SINCs are recognised to be of local importance, but there are also SINCs of Borough and Metropolitan importance. Welsh Harp Reservoir SSSI in the south west of the Borough is designated MOL.
- 7.9 There are four Registered Parks and Gardens in the Borough and three of these are also designated as MOL: East Finchley Cemetery (formally St Marylebone Cemetery), Avenue House Garden, Golders Green Crematorium and St Pancras and Islington Cemetery.
- 7.10 Metropolitan walks run through a number of MOL areas, in particular the chain of MOL that runs north – south from the edge of the North Circular to Totteridge Lane. This area also forms a Green Chain, which forms part of the Dollis Valley Green Walk.
- 7.11 The largest areas of MOL include the St Pancras and Islington Cemetery, Glebelands Nature Reserve, allotments, Coppetts Wood and a football club; Oak Hill Park; and West Hendon Playing Fields with Woodfield Park.
- 7.12 Several schools and buildings associated with outdoor sports and recreation facilities sit within the borough's areas of MOL.
- 7.13 It is noted that Clitterhouse Playing Fields MOL falls within the Brent Cross Cricklewood Regeneration Area, as shown on **Figure A2.2**. This area of MOL is approximately 19 ha and contains football pitches and a play area. It is possible that the area of MOL may be amended as part of the masterplanning for the Regeneration Area.
- 7.14 The Colindale Regeneration Area is securing investment for local parks and open spaces, offering the opportunity to potentially designate new areas of MOL in the west of the Borough, such as along the Silk Stream chain. Furthermore, the Council is also considering amendments to the boundaries of MOL around the New Southgate Opportunity Area to support growth and regeneration in this Opportunity Area.

## Settlement Pattern

- 7.15 Approximately 38% of the borough is relatively open and largely undeveloped: 28% is Green Belt, 8% is MOL and 2% is other open space. This leaves 62% of the area as urban developed land.

- 7.16 Barnet originated as a series of small villages in the countryside that surrounded London and has grown to become part of the suburbia of Greater London. The pattern of growth in the 20<sup>th</sup> century generally followed existing transport corridors, particularly the three railways that traverse the borough: the Midland Railway Line and the High Barnet and Edgware branches of the Northern Line.
- 7.17 The borough is predominantly residential in character, with detached, semi-detached and terraced housing. As well as residential streets the borough also contains: large scale retail units such as supermarkets or industrial development, school, college and university campus development (e.g. the Middlesex University Campus in Hendon), town centres and denser residential estates. The borough also contains a range of other land uses which include business parks, retail parks, hospitals and light industrial.
- 7.18 Barnet has 20 town and village centres but only Edgware is identified in the Core Strategy as a major town centre. There are 14 district centres, 5 local centres and 10 neighbourhood centres. Brent Cross is in the process of being redeveloped. Once finished the redeveloped Brent Cross will be defined as a town centre.
- 7.19 Although there are no washed over settlements in the Borough's Green Belt land, there are some significant areas of development, as described above. In addition, several schools and buildings associated with outdoor sports and recreation facilities are found within the Green Belt and MOL. Notable examples include:
- Mill Hill School;
  - National Institute for Medical Research and Technology; and
  - Watch Tower House.
- 7.20 Three major growth sites (shown on **Figure A2. 2**) are in the process of being developed in Barnet:
- Mill Hill East Development Area: 2,240 dwellings and 5.5 ha of public open space.
  - Colindale Regeneration Area: 10,000 dwellings to be developed across around Colindale Avenue, Aerodrome Road, Edgware Road and Grahame Park Way.
  - Brent Cross and Cricklewood Regeneration Area: 7,500 dwellings, open spaces and improvements to Clitterhouse Playing Fields. Clitterhouse Playing Fields is designated as MOL, and amendments are possible as part of the regeneration.
  - The New Southgate Opportunity Area is highlighted in the draft New London Plan. Approximately 2,500 homes could be developed and 3,000 jobs created.

## Landform and Character

- 7.21 **Figure A2. 3** shows the topography, water courses and major transport routes of the Borough.
- 7.22 Barnet's topography is formed of a rolling landscape of valleys and ridges. The northern side of the Thames basin gradually rises from south to north, with high points at Highwood Hill and Barnet Gate. Three ridgelines run broadly parallel from east to west across the top of the Borough through Chipping Barnet, Totteridge and Mill Hill. Another ridge runs north to south through Whetstone and links with the high ground at Hampstead Heath to the south of the Borough. Finchley Ridge which extends north to west across Finchley towards East Barnet contains ridgetop blocks of ancient woodland. Settlements including Hendon, Finchley, Friern Barnet and East Barnet extend along the valley sides and ridgetops. Linear open spaces tend to extend along streams, railway tracks, with larger open spaces, golf courses and cemeteries on the valley sides. **Figure A2. 3** illustrates the topography of the borough.
- 7.23 Natural England's London Regional Landscape Framework<sup>57</sup> identifies most of Barnet as the Barnet Plateau which is characterised by long views from commons. The plateau extends eastwards to the Dollis Brook and southwards as far as the Welsh Harp Reservoir. High Barnet,

<sup>57</sup> Natural England 2011, London's Natural Signatures: The London Landscape Framework [online] available at: <http://publications.naturalengland.org.uk/publication/6540238365130752>

at 134 metres above sea level is one of the highest points on the Plateau. The southern and western areas of the borough are characterised by lower lying terrain.

- 7.24 The Barnet Plateau retains a field and farmland character to its natural spaces, and pockets of traditional open countryside remain. Some areas of ancient woodland have been retained as well as remnant heathland communities. The Dollis Brook, Silk Stream and River Brent form part of a wider network of streams and ponds throughout the area.
- 7.25 A swathe of agricultural land extends from Mill Hill in the centre of the borough to the northern edge of the borough where it connects with the wider open countryside of South Hertfordshire. The rolling landscape is made-up of small to medium-sized arable farming and grazing fields enclosed by mature hedgerows and trees and interspersed with scattered pockets of woodland. Folly Brook and Dollis Brook flow east to west across the agricultural area.
- 7.26 In addition to the wooded ridges and high ground and the wooded streams and brooks that separate them, there are several major roads and railway lines that form strategic connections and barriers across the Borough:
- The M1 runs north to south through the western half of the Borough.
  - The North Circular runs through the southern half of the Borough in a north east to south west direction.
  - The A1 runs north to south through the western part of the Borough.
  - Two branches of the Northern line (towards High Barnet and Mill Hill East on one branch and Edgware on the other) run through the western half of the Borough generally in parallel to the M1.
  - The East Coast (Great Northern) main railway line used by Great Northern and Thameslink services and intercity services to Peterborough, Cambridge, Leeds, York, Newcastle and Edinburgh runs north to south through the eastern half of Barnet.
  - The Midland railway line runs north to south through the western part of the borough, used by Thameslink services to St Albans and Bedford, and inter-city services to Leicester, Derby, Nottingham and Sheffield.

## Flood Risk and Climate Change

- 7.27 As illustrated in **Figure A2. 4**, most areas of Flood Zones 2 and 3 in Barnet lie along the Silk Stream and its tributaries (including Dean's Brook) in the west of the Borough, in particular at Hendon, Colindale, Burnt Oak and Edgware. Smaller areas of Flood Zone 2 and 3 lie along the Dollis Brook and Brent River, though these in general are very close to water course.
- 7.28 The Borough's green spaces including countryside and open spaces play a major part in limiting the impacts of climate change, absorbing rainfall and air pollutants and combatting the heat island effect in London's built up area. The population density within the borough as well as the open spaces is shown on **Figure A2. 5**.

## Historic Environment

- 7.29 The Borough's historic centres are concentrated along the roads that followed the Borough's high ridges. London subsequently expanded northwards along the Great North Road, resulting in the merging of many of these settlements into the Greater London conurbation.
- 7.30 The Battle of Barnet, fought during the 'War of the Roses', took place at Monken Hadley in 1471. The battlefield is located north of High Barnet in the north of the Borough and consists of Old Fold Manor Golf Course, part of King Georges Field, Hadley Highstone, parts of Monken Hadley village and open fields and woodland. The majority of the battlefield falls within the Green Belt.
- 7.31 Barnet has 15 designated Conservation Areas. The Conservation Areas of Monken Hadley, Totteridge and Mill Hill fall at least partly within the Green Belt and Hampstead Garden Suburb Conservation Area includes a number of areas of MOL.

- **Mill Hill Conservation Area** has examples of the surviving hay meadows and pastures which form some of the richest grassland communities in London and are important to the setting of the conservation area.<sup>58</sup>
- **Monken Hadley Conservation Area** is largely washed over by Green Belt which is attributed to have influenced the nature of development and conserved the rural environment. As a result Monken Hadley has managed to retain its special green and leafy character, with so much open space, in sharp contrast with much of suburban London.<sup>59</sup>
- **Totteridge Conservation Area's** open land forms part of London's Green Belt and part of a larger area of open land of high landscape quality, stretching westwards over parts of Harrow Weald'.<sup>60</sup>

7.32 Policy HC3 of the Draft London Plan<sup>61</sup> 'Strategic and local views' sets out and protects strategic and local views that make a significant contribution to the character of London. None of the views identified are within Barnet. However two of the Borough's Conservation Area Appraisals describe locally valued views:

- **Monken Hadley Conservation Area** makes reference to the King George's Field and Hadley Manor Fields, describing its *rural quality...made up of a patchwork of small fields, intersected by overgrown hedges, narrow strips of woodland and small seasonal streams. A short walk to the top of the hill affords fine views south across London.*<sup>62</sup>
- **Totteridge Conservation Area** has southerly panoramic views through gaps in mature tree and hedgerow boundaries towards Mill Hill, Barnet and Central London.

7.33 There are 2,200 listed buildings in the Borough and a further 1,600 buildings on the local list. There are two scheduled ancient monuments at Brockley Hill in Edgware and Manor House in Finchley, and four registered Historic Parks and Gardens at East Finchley Cemetery, Avenue House Garden, Golders Green Crematorium and St Pancras and Islington Cemetery. Golders Green Crematorium, East Finchley Cemetery and St Pancras and Islington Cemetery are designated as MOL.

7.34 **Figure A2. 6** shows the listed buildings within the borough, as well as Conservation Areas, Registered Parks and Gardens and the designated location of the Battle of Barnet.

## Green Infrastructure and Open Spaces

7.35 The Borough's green infrastructure network and constituent assets are shown on **Figure A2. 7**. The Borough's Green Infrastructure Supplementary Planning Document defines green infrastructure as<sup>63</sup>:

- Green Belt and MOL
- Landscape
- Natural and semi-natural green spaces
- Trees, hedgerows and green corridors
- Playing pitches and outdoor sport facilities
- Amenity green space
- Children's play facilities

<sup>58</sup> London Borough Barnet 2008, Mill Hill Conservation Area Character Appraisal Statement [online] available at: [https://www.barnet.gov.uk/.../mill\\_hill\\_ca\\_appraisal\\_apr2008.pdf](https://www.barnet.gov.uk/.../mill_hill_ca_appraisal_apr2008.pdf)

<sup>59</sup> London Borough Barnet 2007, Monken Hadley Conservation Area Character Appraisal Statement [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/conservation/Conservation-Areas.html>

<sup>60</sup> London Borough of Barnet 2008, Totteridge Conservation Area Character Appraisal Statement [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/conservation/Conservation-Areas.html>

<sup>61</sup> Mayor of London, 2017, The London Plan, The Spatial Development Strategy for Greater London, Draft for Public Consultation [online] available at: [https://www.london.gov.uk/sites/default/files/new\\_london\\_plan\\_december\\_2017.pdf](https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf)

<sup>62</sup> London Borough Barnet 2007, Monken Hadley Conservation Area Character Appraisal Statement [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/conservation/Conservation-Areas.html>

<sup>63</sup> London Borough of Barnet Green Infrastructure Supplementary Planning Document, October 2017,

- Allotments, community gardens and urban farms
- Cemeteries and churchyards
- Rivers, streams and open water areas
- Green roofs and walls

### Parks, Open Spaces and Green Chains

7.36 The Borough has over 200 open spaces covering a total of approximately 889 hectares. Open space in Barnet is categorised in the Borough's Open Spaces Strategy<sup>64</sup> and set out in Table A2 1.

**Table A2 1: Borough Open Spaces**

Type of Open Space	Number of sites	Area (ha)
Public parks	40	89.59
Playgrounds	9	2.05
Sports sites	5	64.17
Natural / semi-natural greenspace	39	249.25
Combination sites	68	477.64
Other miscellaneous greenspaces	42	5.97
Total	208	888.7

7.37 Roughly 50% of the Borough's registered open spaces are designated as MOL.

7.38 In total there is currently 2.36ha of publically accessible natural greenspace per 1,000 Borough residents; however, this is not distributed evenly. Areas in the north of the borough, covered by the wards of High Barnet, Underhill, Totteridge, Edgware, Hale and Mill Hill have at least double the average provision. The Borough's more urban southern and eastern areas, such as Finchley are much more densely developed and populated and therefore have less accessible greenspace.<sup>65</sup> The provision of parks in the following wards falls below the current borough average in terms of parks provision per 1,000 head of population: Brunswick Park, Burnt Oak, Childs Hill, Colindale, East Finchley, Edgware, Golders Green, Hendon, Oakleigh, West Finchley, West Hendon and Woodhouse.

7.39 The Borough's Development Management Plan<sup>66</sup> proposes that 'where a development is in an area of deficiency for publically accessible open space, new open space should be provided in line with the following standards':

- Parks – 1.63 hectares per 1,000 residents.
- Children's play – 0.09 hectares per 1,000 residents
- Sport pitches – 0.75 hectares per 1,000 residents
- Natural green spaces – 2.05 hectares per 1,000 residents

7.40 In 2015 the total area of parks in Barnet was 465.2 hectares, representing approximately 5.4% of the total area of the Borough. Based on the 2015 population of Barnet (367,266), this represents a provision of 1.26 hectares per 1,000 residents. When the total green space provision (including parks, playgrounds, sports sites, natural and semi natural greenspace etc.) in

<sup>64</sup> London Borough of Barnet Parks and Open Spaces Strategy 2016-26

<sup>65</sup> Barnet Open Space, Sports and Recreational Facilities Assessment

<sup>66</sup> London Borough of Barnet, Development Management Policies DPD, 2012 [online] available at: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/core-strategy.html>

the borough is considered the provision is closer to 2.41 hectares per head of population.<sup>67</sup> However, the Borough's population is rising and is projected to continue to rise.

- 7.41 Many of the Borough's parks are designated as either MOL or Green Belt. Most notably, Barnet Copthall Sports Centre, Monken Hadley Common and Mill Hill Park / Arrandene Open Space are designated as Green Belt, and Sunny Hill Park, West Hendon Playing Fields, Hampstead Heath Extension and Oak Hill Park are designated as MOL.
- 7.42 According to the Parks and Open Spaces Strategy the quality<sup>68</sup> of parks and open spaces has deteriorated since 2009. Fewer parks and open spaces are classified as excellent or good and more are classified as fair. In 2015, 1 park received an excellent rating, 9 received good, 49 fair and 12 poor. The number of high value<sup>69</sup> parks has also decreased since 2009: 4 parks are of high value, 20 are high-medium value, 48 are medium value and 1 is of low value.
- 7.43 Barnet does not include any 'Metropolitan Parks' (over 60 ha). All parks in between 60ha and 20ha are classified as 'District Parks' and all Parks under 20 ha are classified as Local Parks. There are seven District Parks and 66 Local Parks in the Borough.<sup>70</sup>
- 7.44 Nearly all of the green space within the Borough is covered by environmental (e.g. SINC)s and/or planning designations (e.g. Green Belt and MOL) which protect the areas from inappropriate development.
- 7.45 There are a large number of outdoor sports and recreation pitches and golf courses in the Borough. 23 are run by the local authority and 19 are privately owned. Golf courses are particularly prevalent, including Mill Hill, Hendon, Finchley, South Herts, Hampstead and North Middlesex.
- 7.46 Copthall Sports Centre located in the centre of the Borough within the pocket of Green Belt which is isolated from the wider Green Belt is the largest and most significant sports and recreation area, containing nationally and regionally significant sports organisations.
- 7.47 The Barnet Federation of Allotment And Horticultural Societies lists 46 allotment sites in Barnet, providing a total of over 4,000 plots. These are relatively evenly distributed around the urban areas of the Borough, although more can be found in central and northern areas with fewer around Hendon and Hampstead Garden Suburb. These allotments are a popular facility and most sites have waiting lists.
- 7.48 Barnet is home to several large cemeteries, the largest of which are St Pancras and Islington Cemetery east of Finchley and New Southgate Cemetery close to Brunswick Park. Other significant cemeteries are located at Mill Hill and Edgware. St Pancras and Islington Cemetery and East Finchley Cemetery are designated as Registered Parks and Gardens.
- 7.49 The borough contains several Green Chains or Corridors, the principal one being the Dollis Valley Green Walk which stretches for 16 km/10 miles from Mill Hill to Hampstead Heath.
- 7.50 The concept of a regional park in North West London has been highlighted in the North West London to Luton Corridor Prospectus for Sustainable Co-ordinated Growth<sup>71</sup>. The area extending from Welsh Harp along the River Brent and its tributaries together with the Dollis Valley Green Walk has been identified as having the potential for designation. The All London Green Grid<sup>72</sup>, published in March 2012 is a policy framework promoting the design and delivery of green infrastructure across London. It highlights the opportunity for a large regional park in the north, centre and east of Barnet. It states that there is the opportunity to 'develop a framework for the creation of a new 'Brent Valley' Regional Park, connecting to Watling Chase Community Forest as a vehicle to improve the quality, connectivity, management, funding and identity of open space within the Green Grid Area.'

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<sup>67</sup> London Borough Barnet Parks and Open Spaces Strategy 2016-2026

<sup>68</sup> The assessment of quality is based on a number of factors which include: fitness for purpose, good quality design and robust management and maintenance.

<sup>69</sup> Value is assessed using a large number of different criteria. For example parks will score differently on value based on: the level of park provision in the area, population growth in the area, deprivation, housing density, health / obesity levels, proximity to schools, events, air quality, etc.

<sup>70</sup> Barnet Open Space, Sports and Recreational Facilities Assessment

<sup>71</sup> North West London to Luton Corridor, Prospectus for Sustainable Co-ordinated Growth, London boroughs of Brent, Barnet, Camden and Harrow, January 2009.

<sup>72</sup> Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. March 2012.

7.51 The population of Barnet is expected to increase significantly over the next 20 years. Much of this growth is likely to be accommodated in the south and west of the Borough where housing densities are already high and there is more limited access to open and green spaces. The greater pressure put on the Borough's existing open and green spaces the more investment will be required to provide new, improved and increasingly more multifunctional green and open spaces.

### Protected Ecological Habitats and Species

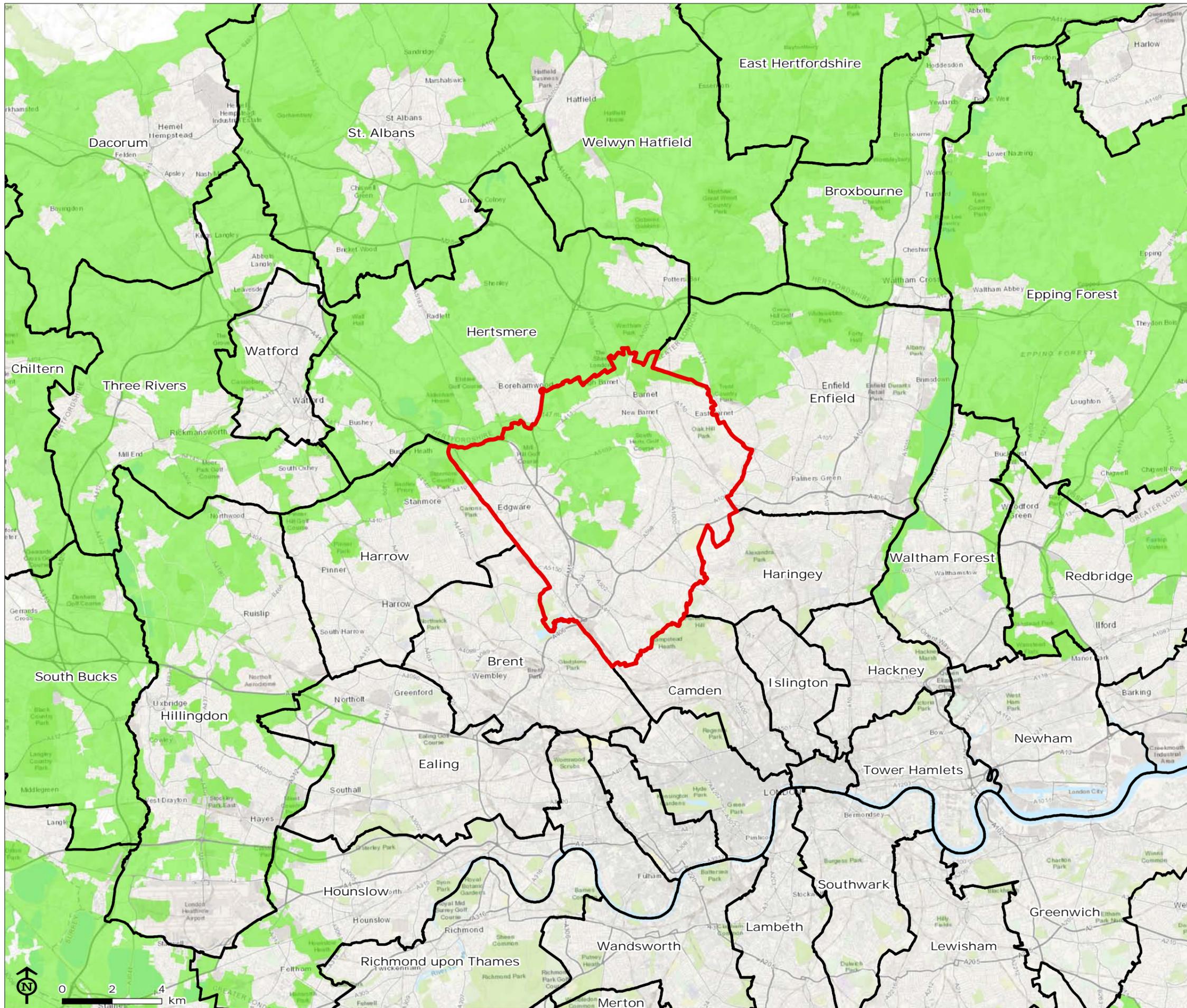
- 7.52 Areas of open space designated for nature conservation are shown in **Figure A2.8**.
- 7.53 Many of the Borough's green spaces are designated for their nature conservation value. The borough currently has one SSSI (Welsh Harp Reservoir), and approximately 65 Sites of Importance for Nature Conservation (SINCs), including SINCs of Metropolitan importance<sup>73</sup>, Borough importance<sup>74</sup> and local importance<sup>75</sup>. Approximately 28 of these SINCs are designated as Nature Reserves. The largest nature conservation sites include: Scratchwood Open Space designated as a SINC of metropolitan importance and also as a nature reserve; Totteridge Fields and Highwood Hill SINC of metropolitan importance; Moat Mount and Moat End farm SINC of borough importance; Monken Hadley Common SINC of borough importance and The Dollis Brook Green Chin, designated as a SINC of borough importance.
- 7.54 Welsh Harp Reservoir SSSI sits within MOL and is designated primarily for breeding wetland birds, in particular the great crested grebe. The diversity of wintering waterfowl is also of note. Other specially protected species that are likely to be encountered in Barnet include bats, great crested newts, grass snakes, the common lizard and slow worms.
- 7.55 Grassland is the dominant habitat in the Borough. The Borough's grasslands fall into four categories of broad habitat: amenity grassland, neutral grassland, tall rough grassland and acid grassland. Lowland dry acid grassland, which falls under the broad habitat acid grassland is a priority habitat, likewise lowland meadows, which falls under the broad habitat neutral grassland is also a priority habitat.
- 7.56 A considerable amount of the Borough is woodland and scrub with some areas of wetland habitat around the Borough's watercourses and lakes. The Borough's ancient woodlands include Scratchwood in Mill Hill, Barnet Gate Wood in Arkley and Big Wood and Little Wood in Hampstead Garden Suburb. The largest areas of woodland are Scratchwood and Moat Mount in Mill Hill and Monken Hadley Common. A significant proportion of the northern part of the Borough falls within Watling Chase Community Forest, within which it is planned to substantially increase the density of woodland up to 2025.
- 7.57 The majority of the areas designated for nature conservation are also designated as Green Belt or MOL. As shown in **Figure A2.8**, all Metropolitan SINCS, apart from Hampstead Heath Extension and Golders Hill Park, are located in the Green Belt. The majority of Local Nature Reserves are also located in the Green Belt, apart from Welsh Harp LNR, Big Wood / Little Wood LNR and Glebeland Woods LNR. A large number of the Borough SINCS also fall within the Green Belt and the remainder are largely designated as MOL, while many of the Local SINCS are also designated as MOL, and a couple fall within the Green Belt. The Welsh Harp Reservoir SSSI is designated as MOL.

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<sup>73</sup> Strategically important conservation sites for London.

<sup>74</sup> Sites which support habitats or species of value at the borough level.

<sup>75</sup> Sites which are important for the provision of access to nature at the neighbourhood level.



Barnet Green Belt and MOL Assessment

Figure A2.1

**London Borough of Barnet location in Metropolitan Green Belt**

- London Borough of Barnet
- Local Authority Boundary
- Green Belt

Map Scale @A3: 1:150,000

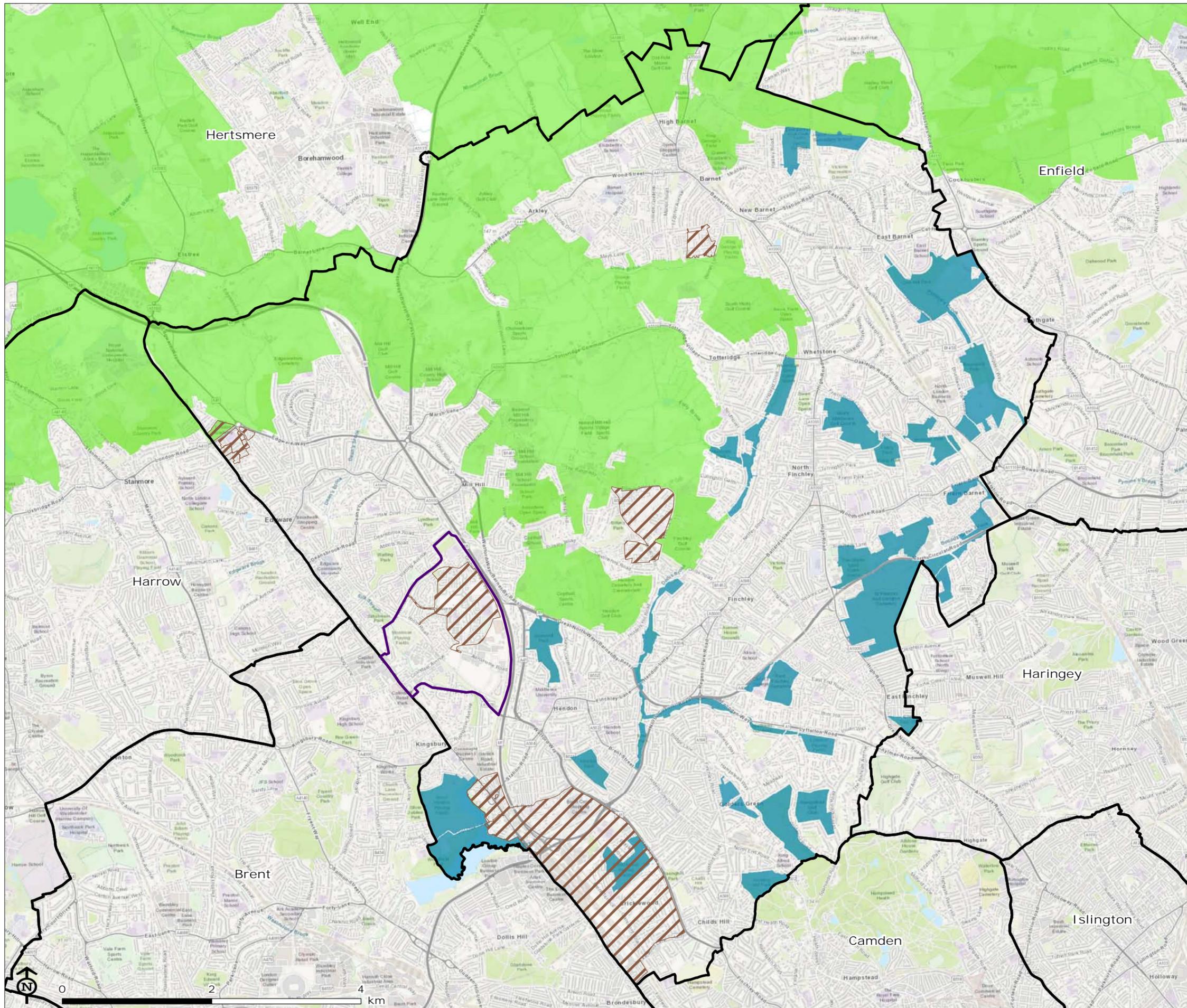


# Barnet Green Belt and MOL Assessment

Figure A2.2

Green Belt and Metropolitan Open Land

-  Local Authority Boundary
-  Major Development
-  Colindale APP
-  Metropolitan Open Land
-  Green Belt



Map Scale @A3: 1:50,000

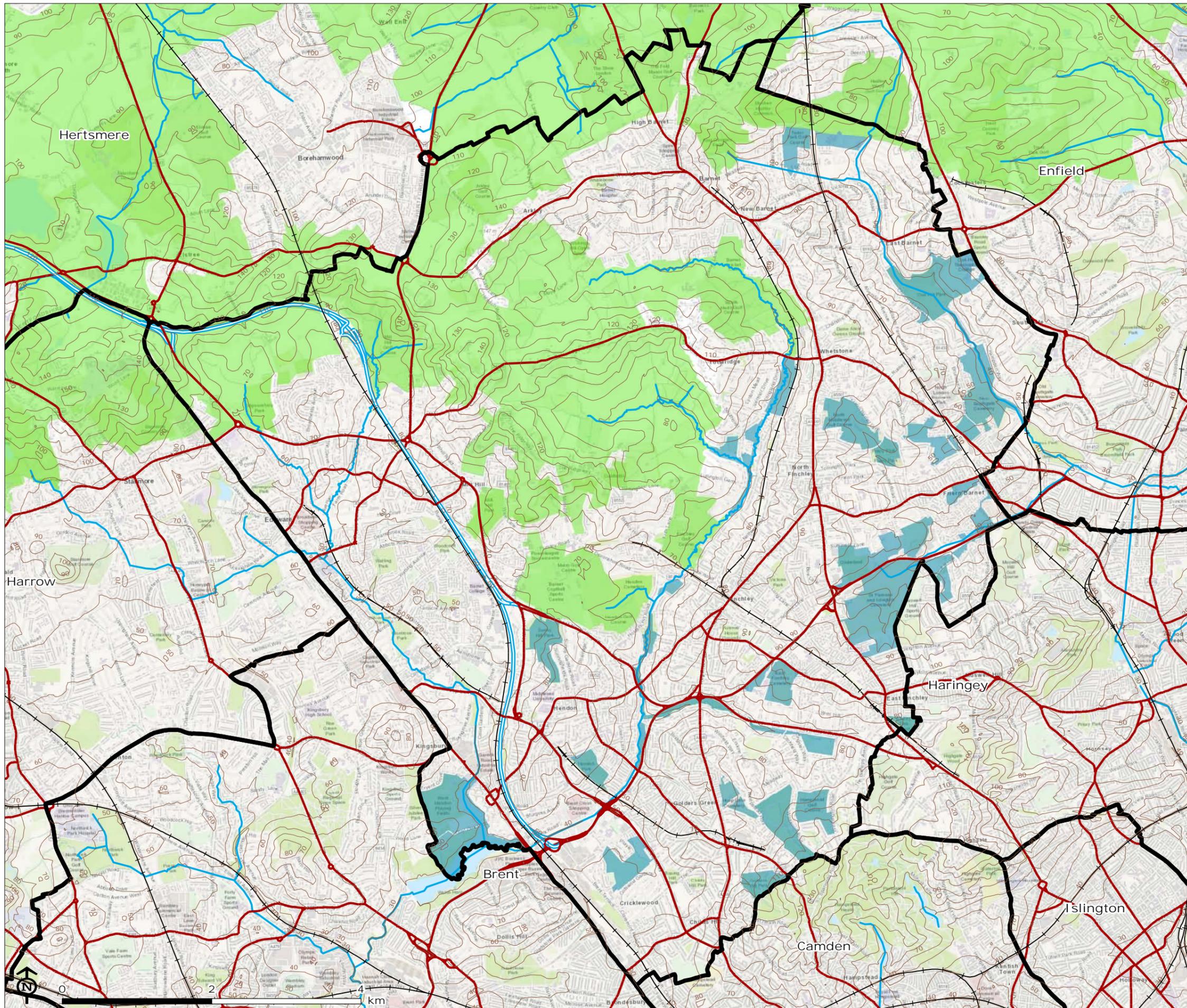


# Barnet Green Belt and MOL Assessment

Figure A2.3

## Borough Topography, Water Courses and Major Transport Routes

-  Local Authority Boundary
-  Watercourse
-  Motorway
-  A Road
-  Railway Line
-  Contours (10m)
-  Green Belt
-  Metropolitan Open Land



Map Scale @A3: 1:50,000

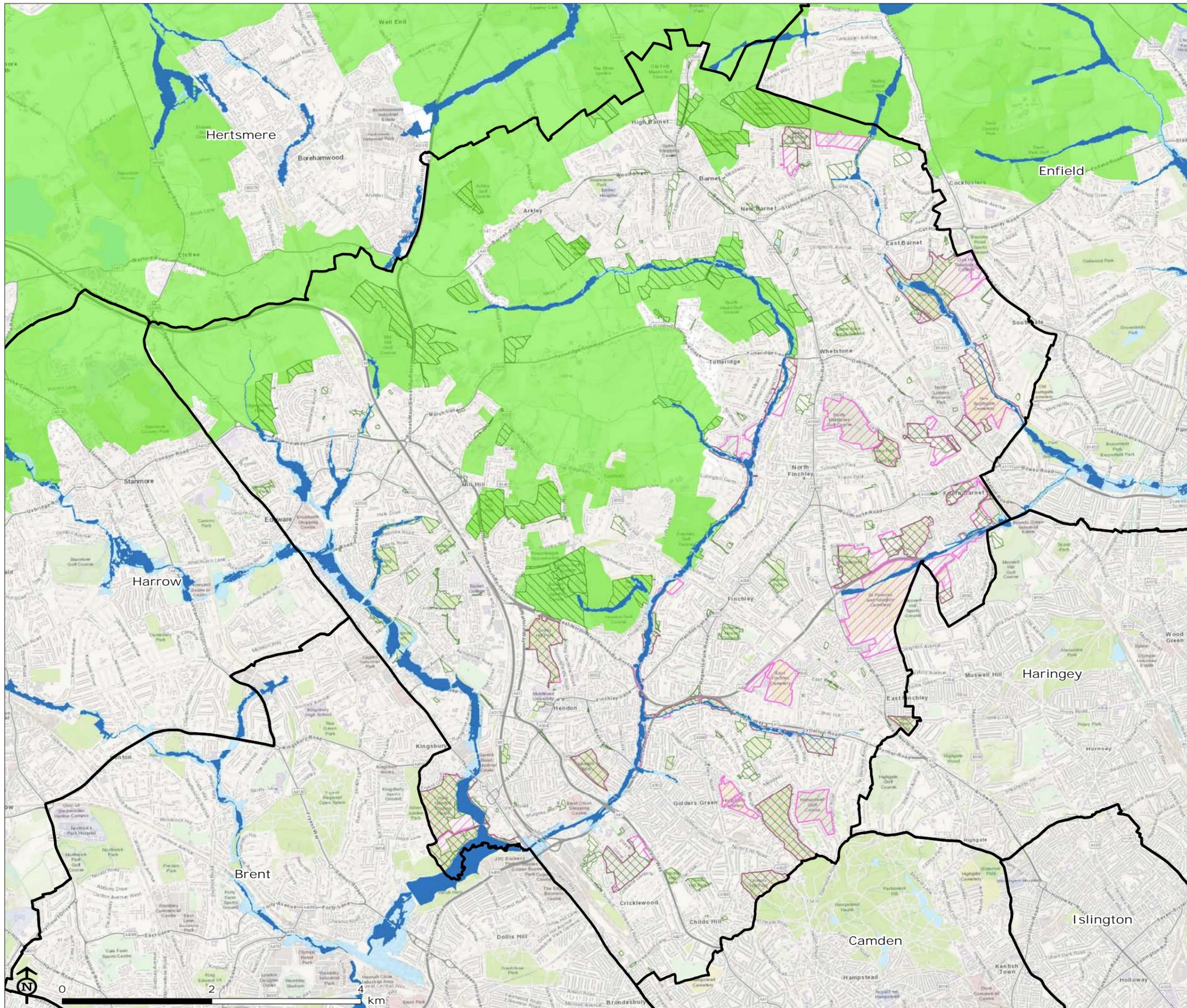


Barnet Green Belt and MOL Assessment

Figure A2.4

Borough Flood Risk

-  Local Authority Boundary
-  Flood Zone 2
-  Flood Zone 3
-  Green Belt
-  Metropolitan Open Land
-  Park and Open Space



Map Scale @A3: 1:50,000

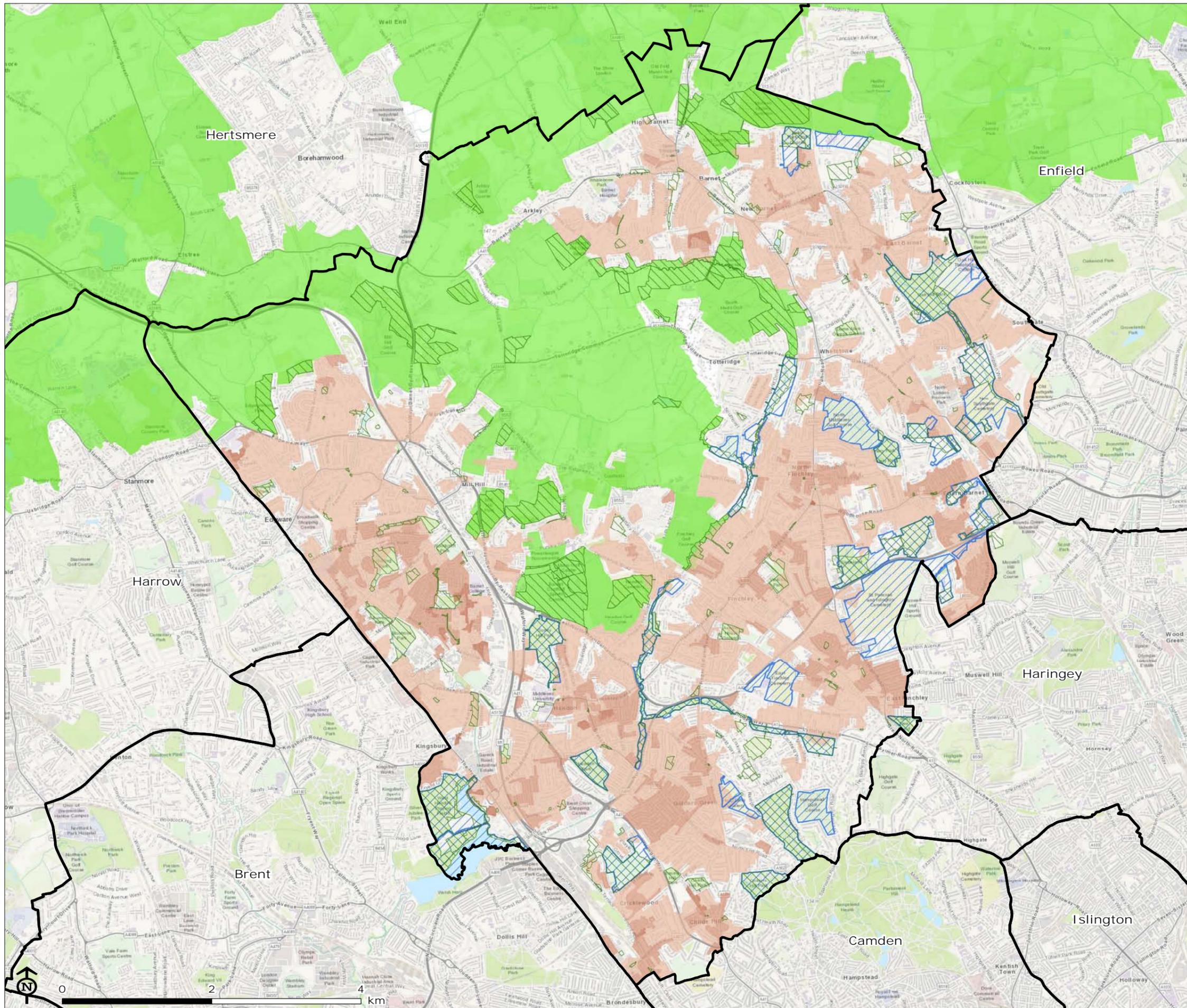


Barnet Green Belt and MOL Assessment

Figure A2.5

**Borough Population Density**

-  Local Authority Boundary
  -  Green Belt
  -  Metropolitan Open Land
  -  Park and Open Space
- Population/Hectare
-  50 - 100
  -  100 - 200
  -  200 - 500
  -  >500



Map Scale @A3: 1:50,000

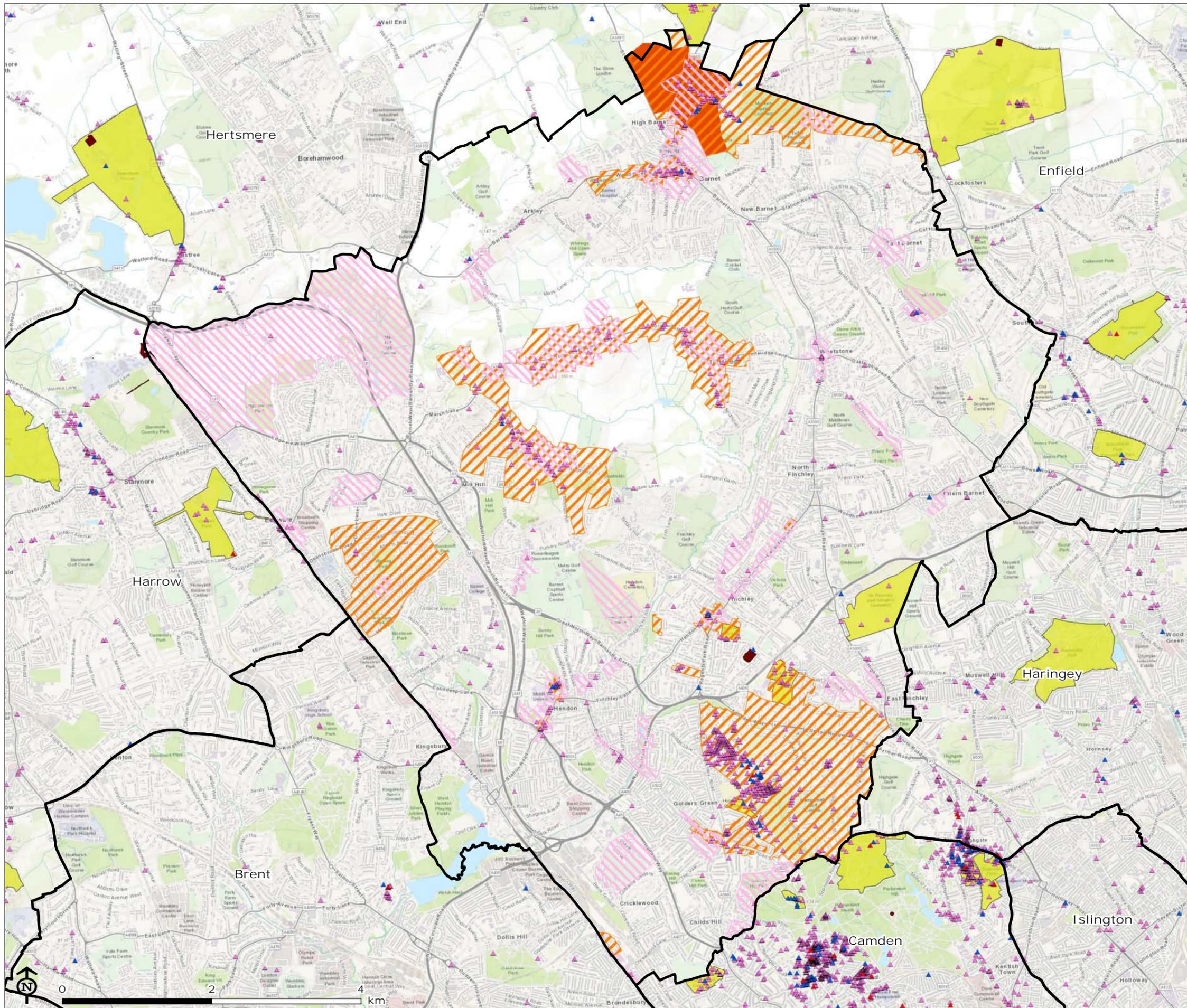


# Barnet Green Belt and MOL Assessment

Figure A2.6

## Borough Historic Environment

-  Local Authority Boundary
-  Grade I Listed Building
-  Grade II\* Listed Building
-  Grade II Listed Building
-  Scheduled Monument
-  Conservation Area
-  Area of Archaeological Significance
-  Registered Parks and Gardens
-  Registered Battlefield - Battle of Barnet 1471



Map Scale @A3: 1:50,000

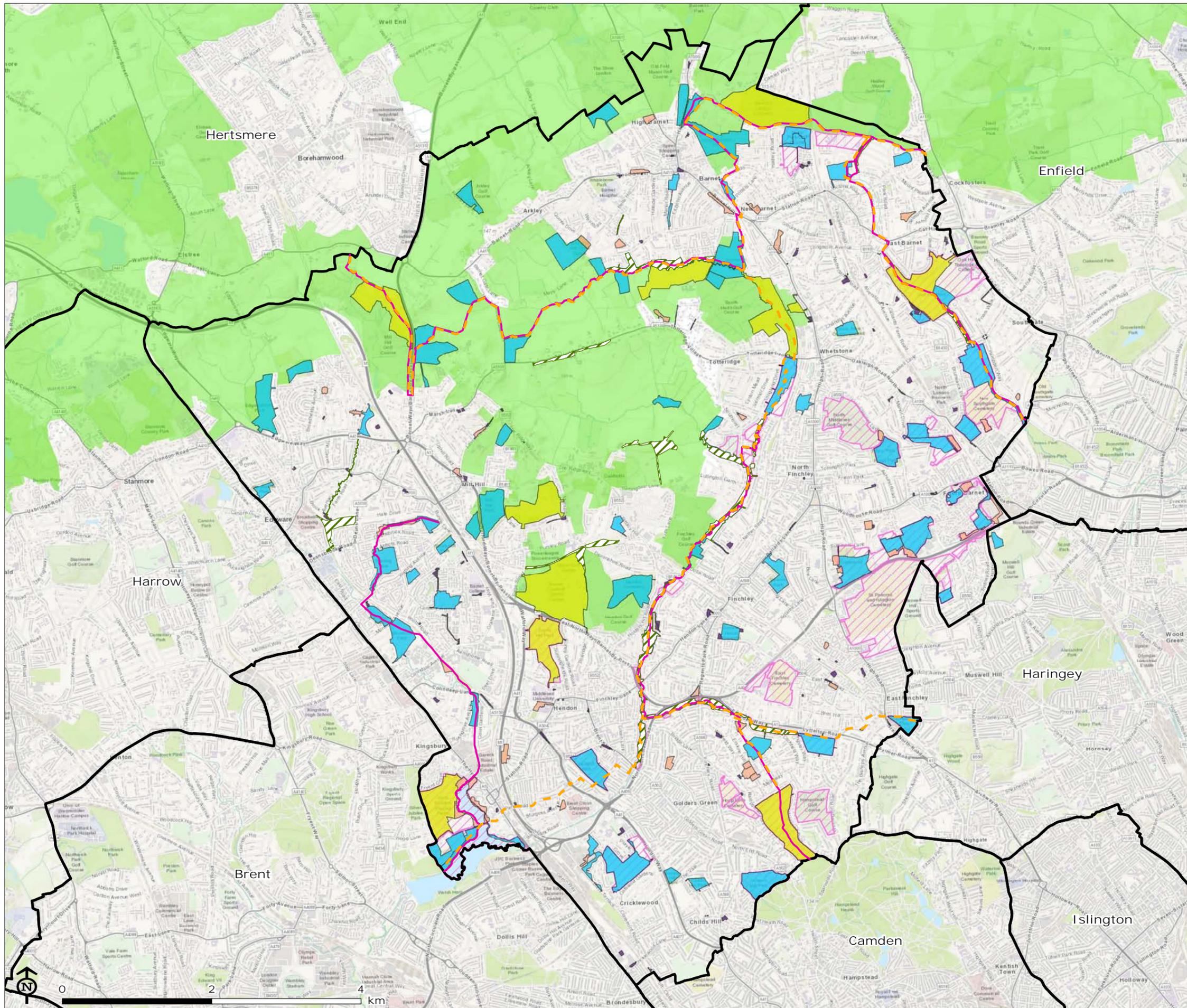


# Barnet Green Belt and MOL Assessment

Figure A2.7

## Borough Green Infrastructure

-  Local Authority Boundary
-  Green Belt
-  Metropolitan Open Land
-  Metropolitan Walk
-  Green Chain
-  Green Corridor
-  Park and Open Space
-  District Park
-  Local Park or Open Space
-  Small Open Space
-  Pocket Park



Map Scale @A3: 1:50,000

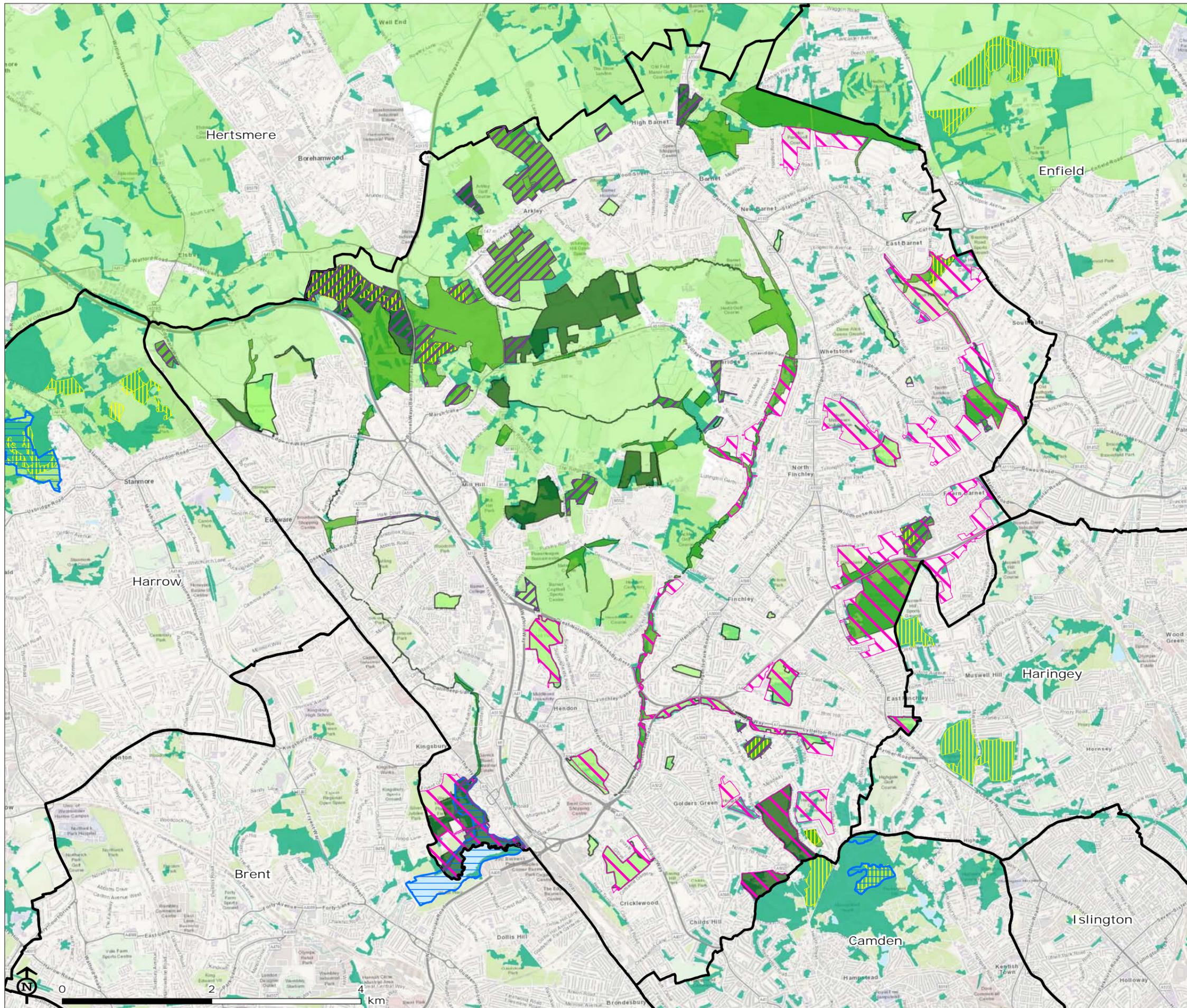


Barnet Green Belt and MOL Assessment

Figure A2.8

**Borough Nature Conservation Designations**

-  Local Authority Boundary
-  Site of Special Scientific Interest
-  Local Nature Reserve
-  Local SINCS
-  Borough SINC
-  Metropolitan SINC
-  Ancient Woodland Inventory
-  National Forest Inventory
-  Green Belt
-  Metropolitan Open Land



Map Scale @A3: 1:50,000

