



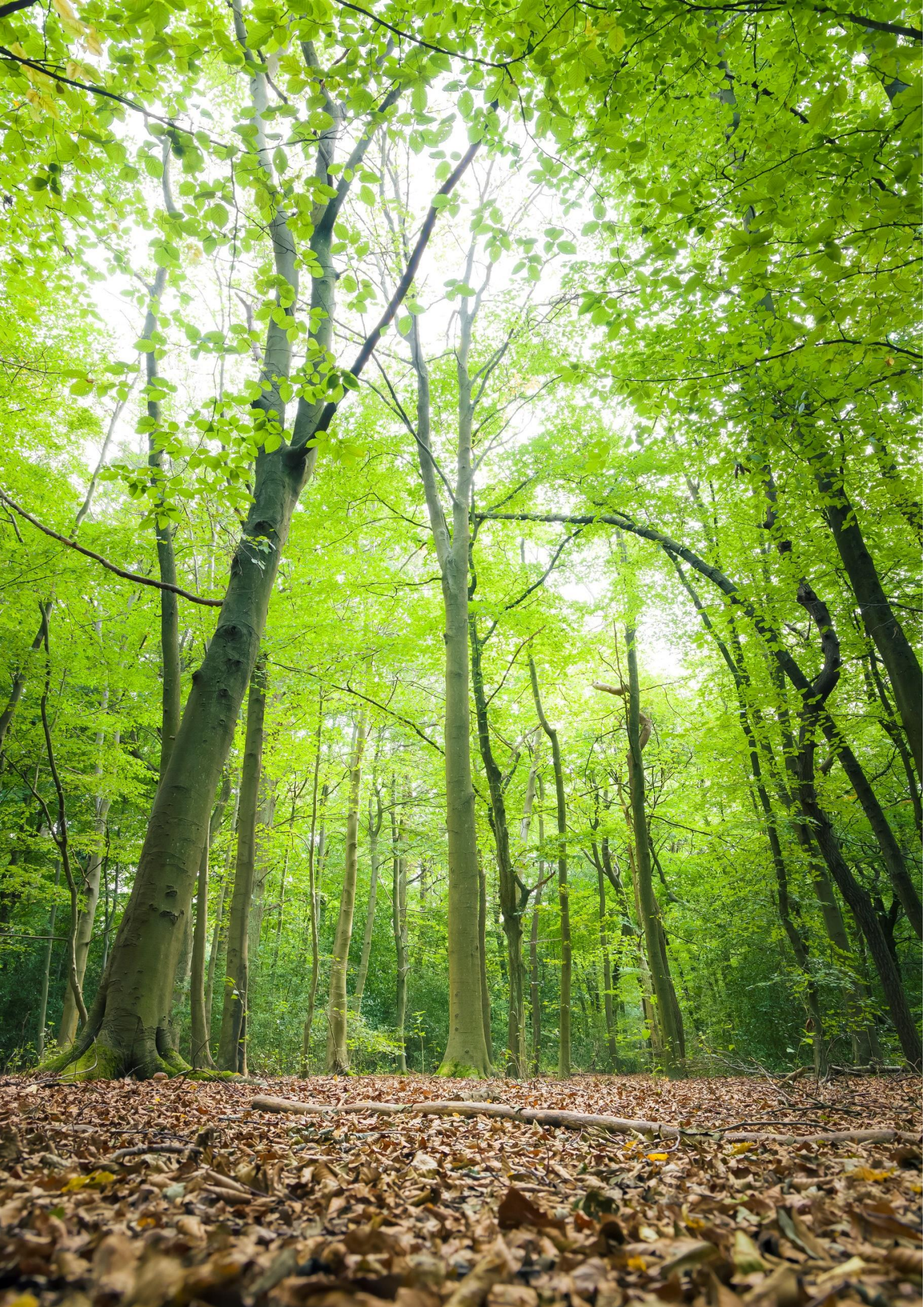
ENFIELD'S GREEN BELT IS AT RISK

May 2021



The countryside charity
London





Introduction

A land assessment by Enfield Council shows that the Green Belt is at risk of being built on. In this report we set out the reasons why building on Enfield's Green Belt is unnecessary and would be a huge mistake.

LBE recently released a Strategic Housing Land Availability Assessment [SHLAA] which listed 29 Green Belt sites as 'potentially developable'. These sites cover 330 hectares of Enfield's Green Belt land. ^[1] [MAP](#).

Among the Green Belt sites targeted for destruction are:

- Green Belt land in Upper Edmonton which is essential to providing a new park for residents that will play an important part in the well-being of local communities in Edmonton, in an area already deprived of green space. ^[2, 3]
- Eight horticulture nurseries in Crews Hill, which campaigners say should be saved to provide local jobs and locally produced food. ^[4]
- Several large areas of productive farmland, vital for local food production at a time of food insecurity and climate emergency. ^[5]

The SHLAA states that inclusion in the document does not mean a site will ultimately be developed. However, an extensive Green Belt review has been undertaken by the Council, so the inclusion of the Green Belt sites should be taken seriously. ^[6]

Benefits of the Green Belt

The environment, people and wildlife benefit from the Green Belt in innumerable ways. Building on the Green Belt would reduce or remove all those benefits.

Climate mitigation would be jeopardized, ecological recovery threatened. Our air would be dirtier. There would be less wholesome local food to eat. Wildlife would disappear. Local people would have fewer places to enjoy the outdoors. Significant health and wellbeing benefits would be lost. The list goes on ... ^[7]

These are just some of the reasons why the Green Belt is protected in the New London Plan in addition to its planning purposes, environmental and social benefits covered by National Planning Policy Framework [NPPF]. ^[8, 9]



There is no need to build on the Green Belt.

The Green Belt does not need to be built on to deliver the homes Enfield needs if brownfield sites are used more intelligently and efficiently.

Several reports have indicated that there is sufficient brownfield land to meet housing targets, including a report by the Mayor of London. ^[10]

Enfield Council must do more to ensure that brownfield sites in private ownership are used to build the type of housing Enfield needs, and that publicly owned brownfield sites are used more effectively and innovatively to respond to shortages of particular types of housing.

For example, Meridian Water is a huge council led development which could be doing far more to provide the affordable family sized homes that Enfield and Edmonton needs. ^[11]

Enfield needs to focus on making the best use of the substantial brownfield opportunities available to it, before even considering building on the Green Belt.

Building on the Green Belt would not deliver the type of homes Enfield needs.

Housing built on the Green Belt is not affordable. Enfield does not need expensive executive homes in the Green Belt.

CPRE's report Space to Breathe showed that only a tenth of homes built in the Green Belt are affordable and these are rarely the genuinely affordable homes that Enfield needs i.e. they are not homes for Social Rent. ^[12]

Additionally, people living in Green Belt developments are tied to owning and using cars as well as being tied to the costs of commuting. This is unsustainable and creates further financial stress for families on lower incomes.

Doubling down on failure is not the answer.

Strategic failings are not a good enough reason to justify building on Enfield's Green Belt.

The problem for Enfield is this; despite having large amounts of developable brownfield land, Enfield has not met its overall housing targets since 2018. Over the last 3-years the Council has only met 56% of its housing target (compared to 85% pre-2018), thus failing the Government's Housing Delivery Test. ^[13]

Furthermore, over the past 10 years far more 1-2 bed flats have been built in Enfield than are required, but nowhere near enough homes with 3+ bedrooms. The number of genuinely affordable homes built over the last 10 years has been far too low. ^[14]

These strategic failings could and should have been recognised several years ago and urgently addressed over the last 3-4 years, but these issues appear to have been overlooked and things have been allowed to drift.

However, building on the Green Belt is not the answer - it is a distraction and not an appropriate way to respond to the Council's strategic failings.

Funding cuts mean council officers have limited capacity and resource to deal with and respond to planning issues - their time would be much more effectively used ensuring brownfield sites such as Meridian Water are appropriately developed. Getting into what would almost certainly be tricky, expensive, and prolonged legal battles about the Green Belt will, apart from anything else, be inefficient and distracting, and will ultimately slow down housing delivery.

Furthermore, allowing even the potential to build on the Green Belt would distract from the re-use and the intensification of Enfield's brownfield land. The development of Enfield's brownfield land needs to be prioritised for development in order to drive innovation and efficient use of this land, to make the best use of existing infrastructure, and to help ensure that these areas benefit from regeneration and investment. ^[15]

Enfield's Green Belt does need to evolve.

Enfield's Green Belt does need to keep evolving and play its part in helping to meet a wide range of important local needs.

For example, there is Green Belt land near Edmonton in south east Enfield that has been fenced off from the public and left to deteriorate. This land should be brought into use as much needed publicly accessible greenspace for the local community to enjoy and benefit from, and to help tackle climate change. The benefit to the local area would be highly significant.

Likewise, there are areas of Green Belt elsewhere in Enfield that could be doing far more to provide local employment in the green economy, be better utilised for growing food, and used more successfully to help tackle the climate emergency and wildlife depletion. For example, there are horticulture nurseries in Crews Hill, which could be used more effectively to help provide local jobs and local food. ^[16]

The Green Belt does need to keep evolving and some parts of Enfield's Green Belt do need to be managed better but allowing developers to build housing on the Green Belt is unnecessary, irreversible, and is not the best way to use this land.



Action is needed to protect Enfield's Green Belt.

We need to secure Enfield's Green Belt for future generations. It would be tragic indeed to squander it just as millions of Londoners, in the wake of the pandemic, have rediscovered its life-saving value.

For these reasons we urge our communities:

- To contact their MPs and local councillors and hold them responsible for the protecting the Green Belt and promoting the benefits for everyone and asking them to make sure that Enfield's brownfield sites are used more effectively for sustainable house building.
- To respond to the Local Plan consultation and Meridian Water Masterplan consultation this summer, which will be an opportunity for the local community to tell the council what they think of their plans for Enfield.

We also urge Enfield Council to:

- Thoroughly investigate and prioritise brownfield sites for housing.
- Commit to using brownfield site more effectively, which means the Council must do more to ensure private developers build the type of housing Enfield needs and developments on publicly owned brownfield land are used more effectively to respond to shortages of particular types of housing.

Finally, we urge the Government to improve funding for affordable housing, in order to ensure that brownfield sites can be fully optimised to build the type of affordable housing Enfield needs.

References and Additional Information

1. Enfield Council's, Strategic Housing Land Availability Assessment (SHLAA) (November 2020), can be found here:
<https://new.enfield.gov.uk/services/planning/enfield-strategic-housing-land-availability-assessment-shlaa-2020-planning.pdf>
2. Enfield Council's Green and Blue Strategy Audit shows that Upper Edmonton and the surrounding wards are classified as having a deficiency of open space (public park land). The implication of the audit is that the deficiency of greenspace in Upper Edmonton alone is already the size of 56-64 full-sized football pitches, with the other wards adjacent to Upper Edmonton having similar deficiencies. See page 55 of The Blue and Green Strategy Audit for more information:
<https://letstalk.enfield.gov.uk/blueandgreen>
3. CPRE London and Better Homes Enfield have identified approximately 71 hectares of largely unused Green Belt land in Upper Edmonton which would be ideal for a new park (Banbury Reservoir Park) and that would help address the deficiencies of open greenspace in the local area. The Park would have considerable benefits for the residents of Edmonton. See CPRE London 10 New Parks for London Campaign 2021, for more information:
<https://www.cprelondon.org.uk/news/lets-create-ten-major-new-parks-for-london-now/>
4. See EnCaf "Response to the Blue & Green Strategy Consultation 2020" – Our Priorities and Recommendations, for more information about how some of Enfield's Green Belt land could be used more beneficially:
<https://www.encaf.org/post/response-to-the-blue-green-strategy-consultation-2020>
5. See EnCaf "Response to the Blue & Green Strategy Consultation 2020" – Our Priorities and Recommendations for more information:
<https://www.encaf.org/post/response-to-the-blue-green-strategy-consultation-2020>
6. Enfield Council have said that a new Green Belt Technical Review would be released in early June 2021, despite the Mayor's office saying there is no need for Enfield to replace the 2013 Green Belt review.
7. The benefits of greenspace and London's Green Belt are set out in a 2019 paper by the All-Party Parliamentary Group for London's Green Belt, called "A positive Vision for London's Green Belt".
https://www.welhat.gov.uk/media/15889/GB-6-APPG-London-Green-Belt-Report/pdf/APPG_London_s_Green_Belt_report.pdf?m=637140111559770000#:~:text=London%27s%20Green%20Belt%20provides%20an,people%27s%20health%20and%20wellbeing%3B%20the

Public Health England notes that people need access to good quality greenspace for relaxation, exercise, socialising and play. Greenspaces are associated with: Physical and mental health benefits, Community cohesion, and Environmental benefits.

Natural England estimates that £2.1 billion per year could be saved in health costs by improved access to greenspace. A review of the benefits of London's greenspace, found that greenspace could save £950 million per year by contributing to better physical and mental health.

For more information see: Public Health England: Improving access to greenspace; A new review for 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf and; UK Government - Investing in nature is an investment in the NHS, says Environment Agency Chief Executive (2020)
<https://www.gov.uk/government/news/investing-in-nature-is-an-investment-in-the-nhs-says-environment-agency-chief-executive>

8. The London Mayor strongly supports the continued protection of London's Green Belt. The Mayor's London Plan (2021) says that London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners and the plans clearly aims to accommodate the majority of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces.

The London Plan says that London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment. More information can be found here:

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

9. The NPPF (2019) provides a clear direction for the management of development within the Green Belt as well as policies for conserving and enhancing the natural environment. For example, the NPPF states that once Green Belts have been defined, 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. Furthermore, that local planning authorities should regard the construction of new buildings as inappropriate in the Green

Belt, with a few exceptions e.g. building for outdoor sport / recreation and farm buildings. See the NPPF for more details:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

10. Enfield RoadWatch, in collaboration with The Enfield Society and CPRE-London, created Space to Build - Enfield , a survey of brownfield and previously-developed sites in the borough that could be used for housing or mixed-use development. The Council is required to consider brownfield before greenfield sites. We advocate for only a small portion of the sites, but the report demonstrates ample room to meet the current housing target. The report can be accessed here: https://www.london.gov.uk/sites/default/files/ad_84_space_to_build_enfield_report_final.pdf

With the new London Plan now final, the target set by the Mayor for Enfield is 12,460 new homes over the next ten years. Better Homes for Enfield's report 'Needs not Numbers' identifies almost that many already in the pipeline but highlights the need for more larger affordable units to meet borough targets for family homes and more affordable homes. Space to Build shows that these can be accommodated without releasing Green Belt. The Better Homes report can be found here: <https://betterhomes-enfield.org/author/betterhomesenfield/>

The Mayor's official assessment of housing need in London found that the city now requires around 66,000 new homes a year to provide enough homes for current and future Londoners. According to this assessment around two-thirds of these new homes should be affordable homes. The Mayor is clear we must increase the supply of new homes, particularly of affordable homes.

The Mayor's London Plan has already identified enough land within Greater London to build 65,000 new homes a year to meet this need.

<https://www.london.gov.uk/what-we-do/housing-and-land/how-many-homes-does-mayor-think-need-be-built-london#:~:text=The%20Mayor%27s%20official%20assessment%20of,for%20current%20and%20future%20Londoners.&text=The%20Mayor%27s%20new%20draft%20London,year%20to%20meet%20this%20need.>

11. Meridian Water is a huge brownfield development site in Edmonton in south east Enfield. It offers an enormous opportunity to address Enfield's housing needs but is currently failing to deliver. For example, in May 2020 the development was criticised by members of the planning committee of all political persuasions for not providing the large family homes so sorely needed in Enfield. See the report in Enfield Dispatch for more information: <https://enfielddispatch.co.uk/councillors-demand-more-family-size-homes-at-meridian-water/>

Meridian Water could be about responding to local housing needs and the environmental crisis in the best way it can within financial viability constraints, but it isn't delivering the type of homes

Edmonton needs or enough greenspace. There is a significant shortage of family housing in Edmonton (i.e. housing with 3+ bedrooms), which is linked to overcrowding and serious health and social consequences for local people, which disproportionately negatively impacts the Black community.

Enfield is almost 3,000 homes behind target for delivering the number of 3+ bedroom homes needed since 2010 (although more than 1,500 ahead of target for 1-2 homes), so it is enormously disappointing that the plans for Meridian Water do not even achieve half of the minimum amount of 3+ bedroom homes that are required by planning policy. Most of the units will be studio/1-2 bed flats in tower blocks. For more information go to <https://betterhomes-enfield.org/2021/01/12/enfields-deepening-family-housing-crisis/>

In June 2020 Enfield's Overview and Scrutiny Committee published a report that flagged numerous concerns about the housing mix at Meridian Water, and much else. The report can be accessed here:

<https://governance.enfield.gov.uk/documents/s83354/Meridain%20Water%20Workstream%20Report.pdf>

12. The CPRE's Space to Breathe Report can be downloaded here https://www.cpre.org.uk/wp-content/uploads/2019/11/Space_to_Breathe.pdf. This report shows that Green Belt developments are not affordable - and that only a tenth of homes built in the Green Belt are affordable and these are rarely homes for Social Rent. Additionally, people living in Green Belt developments are tied to owning and using cars as well as being tied to the costs of commuting. This creates further financial stress for families on low incomes.
13. Enfield Council's response to failing the Government's Housing Delivery Test can be found here: <https://new.enfield.gov.uk/services/planning/enfield-housing-delivery-action-plan-2020-planning.pdf>
14. In April 2021 the GLA data portal showed that over the last 10 years Enfield is almost 3,000 homes short of its target for new homes with 3+ bedrooms but has exceeded its target for 1-2 bed homes by 1,414 units. Furthermore, Enfield is 1,657 homes short of its target for Social Rent housing over the last 10 years. This means brownfield sites are not being used as effectively as they should be to build the homes that Enfield needs. The GLA data portal can be accessed here: <https://data.london.gov.uk/dataset/planning-london-datahub>
15. The London Plan states that brownfield sites should be prioritised for development to help make efficient use of land and infrastructure and to direct investment towards urban areas. See https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf 8.2.1 for more details.

The efficient use of brownfield land is essential to protecting the Green Belt. Unfortunately, planners in Enfield are not bringing forward housing schemes that deliver the type of homes that Enfield needs, or which make the most efficient use of land available in terms of the number of people housed. For example, allowing for Nationally Described Minimum Space Standards it takes 3,700 square metres to house 100 people in studio flats but only 1,720 square metres to house the same number of people in 3 bed (5 person) homes. Smaller flats are less efficient at housing people and are less flexible, yet these make up the large majority of the homes being built in Enfield, an approach that not only contradicts local housing policy but puts the Green Belt at increased risk.

16. See EnCaf “Response to the Blue & Green Strategy Consultation 2020” – Our Priorities and Recommendations for more information:

<https://www.encaf.org/post/response-to-the-blue-green-strategy-consultation-2020>