



Enfield Council's draft Local Plan undercounts the number of homes that could be built on brownfield sites

Enfield Council's draft Local Plan says that 25,000 homes need to be built in Enfield over the next 20-years. The council claims there are not enough brownfield sites to accommodate these homes, so 6,500 need to be built in greenbelt areas. In this paper we explain why this claim is incorrect.

There are many benefits associated with building on brownfield sites.

A brownfield site is previously developed land, which has the potential to be redeveloped. By comparison, a greenfield site is land that has not previously been developed, such as woodland, agricultural land and greenbelt land.

The redevelopment of brownfield sites plays an important part in the renewal of our towns, suburbs and industrial areas. Building housing on these sites can bring multiple benefits, especially as the sites are often in sustainable locations and near existing infrastructure.

The redevelopment of brownfield sites can help to create new jobs and bring investment into urban areas to benefit existing residents. For example, the investment can be used to decontaminate land, create parks, develop better climate change protections, visually improve an area, enhance public services and essential amenities, and improve access to safe active travel routes.

Enfield council claims there are not enough brownfield sites.

Enfield Council's draft Local Plan says that 25,000 homes need to be built in Enfield over the next 20-years and claims that 6,500 of these will need to be built in greenbelt areas because there are not enough brownfield sites.

Brownfield sites can deliver far more homes than the council claims.

We have reviewed the council's draft Local Plan in detail, and it appears that far more homes could be built on brownfield sites than the council claims. There are two main reasons for this:

1. Anomalies in the council's calculations.
2. The council has excluded brownfield sites.

Taking each of these in turn:

(1) Anomalies in the council's calculations.

- **The draft Local Plan does not include enough small sites to meet the London Plan target.** To meet the Mayor's London Plan target, a minimum of 7,060 homes should be built on small brownfield sites in Enfield over the next 20-years i.e. sites smaller than 0.25 hectares. Although the council states a clear intention to meet this target (see Policy DM H4 p203), only around 4,100 homes on small sites have been allowed for in the draft Local Plan.



Therefore undercounting about 3,000 homes that could be built on small sites. We have previously reported on this issue in more detail [here](#).^[1]

- **The draft Local Plan actually identifies enough housing on large brownfield sites to deliver the housing needed.** Around 17,940 homes will need to be built on large brownfield sites (>0.25 hectares) in Enfield over the next 20-years. A detailed reading of the draft Local Plan shows that the council has identified large brownfield sites to deliver 19,596 homes, which is 1,656 more than needed.^[2]
- **The draft Local Plan has undercounted the number of homes some brownfield sites with existing planning approval will deliver.** Some brownfield sites already have planning approval. The draft Local Plan includes housing estimates for these sites that are lower than the number already approved, therefore undercounting the homes these sites will deliver.^[3]
- **The draft Local Plan's estimates for the number of homes brownfield sites can deliver are lower than estimates in other council documents.** Some estimates made about the number of homes a brownfield site could deliver are substantially lower than other assessments made by the council. This is another way homes have been undercounted.^[4]

- **The estimated delivery timelines has resulted in further undercounting:** The draft Local Plan estimates when the housing on some large sites will be completed, and predicts that a number of sites will not deliver housing until after 2039 (i.e. beyond the 20-year Plan period). However, other council documents show that these sites will deliver housing sooner than is predicted in the draft Local Plan. This inconsistency is another source of significant undercounting of homes that could be built on brownfield sites within the Plan period.^[5]

After accounting for these anomalies, we estimate that there are already brownfield sites identified in the draft Local Plan capable of delivering 29,660 homes over the next 20-years.^[6]

(2) The council has excluded brownfield sites.

A number of brownfield sites have been excluded from the draft Local Plan, which if included, could deliver a far more homes. For example, there are sites at Meridian Water and in Brimsdown that have not been included in the draft Local Plan and which could deliver around 9,000 additional homes, as well as new and additional employment space. [See Appendix A]

There are also a large number of smaller brownfield sites, which were submitted to the council by housing campaign groups in January 2019. These sites are generally in sustainable



locations and could make a significant contribution towards delivering the housing Enfield needs. The council decided not to include many of these sites in the draft Local Plan due to a lack of information. ^[7] However, the campaign groups have not been asked to provide the missing information.

Our analysis of the draft Local Plan (and the Local Plan Evidence Base) demonstrates that far more homes could be built on brownfield sites than the council claims and that there are sufficient brownfield sites to deliver the 25,000 homes target.

Better Homes Enfield

APPENDIX A

Brownfield sites in Brimsdown and Meridian Water that could deliver around 9,000 homes have been excluded from the draft Local Plan because they are on Strategic Industrial Land (SIL). Current use on the sites has already developed beyond industrial uses and both sites would benefit from modernisation.

The developers' visions for these sites support the creation of new employment space, and housing. Any loss of SIL could be offset by two new SIL sites in Southbury that have been identified in the draft Local Plan, but which have not been included in the Plan's Industrial Land site allocations. Alternatively, these sites in Southbury could be developed for housing.

There are advantages associated with the redevelopment of both sites. For example, redevelopment would improve connectivity between existing communities and greenspace at Lee Valley Regional Park, which is currently severed by industrial sites. Investments in these sites would also improve the blue/green infrastructure needed for climate change mitigation. The development of these sites would deliver a large number of homes in sustainable locations (e.g. near railway stations), as well as additional employment.

There has already been enormous investment in the regeneration of Meridian Water including a new train station, which should help to increase the investment appeal in the surrounding areas and help unlock growth gains on other brownfield sites. Unfortunately, the council has decided not to complete the scheme until 2055.

Despite the enormous benefits associated with developing these brownfield sites, neither of them has been included in the housing allocations in the draft Local Plan, but neither have they been included as targets for SIL intensification, despite the potential for intensification of these sites. The draft Local Plan appears to be proposing that that these two brownfield sites should be largely ignored for the next 20 years. This means there are two very large brownfield sites that would not be used to anywhere near their full potential either for housing, or for employment or for intensified industrial use for at least 20-years. This is an unsatisfactory approach to efficient land use.



Footnotes and Additional Information

1. See <https://betterhomes-enfield.org/> BHE – draft local plan small sites paper
2. 25,000 minus the 7,060 minimum homes needed from small sites equals a maximum of 17,940 from large sites (0.25 ha+).

Table 8.2 in the draft Local Plan identifies sites to deliver 30,192 homes. After subtracting housing in Green Belt areas (6,500) and Small Sites, including unidentified small windfall schemes (4,096), it leaves 19, 596 homes, which will be delivered on large brownfield sites. This is 1,656 more than is needed

3. Examples of undercounting against actual NET gains in granted planning approvals (these examples = 297 undercounted):

HELAA REF	SITE	HELAA / DLP	PLANNING APPROVAL
COP10	Blackhorse Tower	200	219
COP71	New Avenue	213	237
SA9	Colosseum Retail Park	1,587	1,800
PP-08682627	292 - 308 Southbury Road	63	80
TBC	Royal British Legion	10	16
BOP13	Ridgeon Court	-14	4

4. Examples of undercounting against other known information (these examples = 2,046 undercounted):

HELAA REF	SITE	HELAA / DLP	OTHER INFO *
SA2	Palace Gardens	350	900 **
SA31	Cockfosters Car Park	316	351*
SA35	Wessex Hall Building	110	129*
SA3	100 Church Street	56	78*
SA16	Pub, Fore Street	68	112*
UPP32	Meridian P1	725	950**
COP71	New Avenue	213	334*
19/01941/FUL	Office Village	125	200 ***
20/01049/FUL	Arnos Grove Car Park	120	162 ***
SA15	Joyce & Snells	1,217 (within 20 years)	2,130 **

e.g. *current application, ** council/cabinet approved business case / contract / *** Appeal in progress

5. Examples of potential timeline issues (these examples = 661 undercounted):

HELAA REF	SITE	NET housing delivery outside Plan Period
SA15	Joyce Avenue and Snells	608*
EDC2	Edmonton Green Sh. Centre	631 **
TBC	867-879 High Road	30

* The council's 2019 feasibility work said the project would be delivered in 15 years (note not counted here as already counted above); ** Application says scheme will be delivered sooner



6. Total brownfield housing once anomalies are accounted for
(these examples = 661 undercounted):

TYPE	NUMBER
Minimum Small Sites Homes Required by Plan	7,060
Homes on Large Brownfield sites already identified in Plan	19,596
Homs undercounted vs. actual planning approvals	297
Homes undercounted vs. other council information	2,046
Homes undercounted due to timing inconsistencies	661
TOTAL BROWNFIELD SITES	29,660

7. CPRE, Enfield RoadWatch, The Enfield Society: Space to Build, Enfield January 2019
<https://new.enfield.gov.uk/services/planning/local-plan-individual-responses-v-z-planning.pdf>