



Homes built in Green Belt areas: Building in Green Belt areas will not deliver the affordable housing Enfield Council claims

There is an urgent need for more affordable housing.

Enfield needs around 10,500 affordable homes, including 3,500 Social Rent homes with 3+ bedrooms. These family homes are needed to provide permanent and safe housing for the thousands of families with children currently living in temporary accommodation and in other unsuitable conditions across Enfield e.g. in housing that is overcrowded, unhealthy or unsafe.

Thousands of affordable homes are also needed for first-time buyers who are struggling to get on the housing ladder and who are unable to afford a home in Enfield, near where they grew up or within a reasonable commuting distance from their work.

[See Appendix 1 for more information about housing needs in Enfield]

Enfield Council claims building on Green Belt areas will deliver the affordable homes needed.

Enfield Council has put forward proposals in its draft Local Plan that will allow around 6,500 homes to be built on Green Belt areas over the next 20-years. The council says that building on these areas will deliver thousands of new affordable family homes and claims that: *“Development in the Green Belt areas is a more viable form of development and allows the borough to deliver **at least 50%** of housing on Green Belt sites as affordable housing products”*. ^[1]

The council’s claim is incorrect.

The council’s claim that development in the Green Belt areas will deliver **at least 50%** affordable housing is based on the findings of a ‘viability assessment’. ^[2]

However, this viability assessment did not report that **“at least 50%”** affordable housing could be delivered in Green Belt areas, it reported that **“up to 50%”** could be delivered on greenfield sites. ^[3] **“Up to 50%”** on greenfield sites is completely different from **“at least 50%”** in Green Belt areas.

The viability assessment also stated that it had been unable to fully account for the full costs associated with building on specific sites. For example, it was unable to account properly for road building and infrastructure costs. These costs directly impact the amount of affordable housing that can be delivered in Green Belt areas and need to be accounted for.



Unsurprisingly, the assessment's authors cautioned against drawing firm conclusions.^[4] However, the council appears to have ignored this note of caution and has made a claim about affordable housing on Green Belt areas which is both incorrect and misleading.

The council's claim is contradicted by 'real-world' evidence.

Research that examines the types of homes that actually get built in Green Belt areas shows that only a small proportion of these are "affordable". The average, based on a sample of over 17,000 homes, is about 10%.^[5]

Furthermore, many of the new homes classified as "affordable" in Green Belt areas are likely to be 1-2-bedroom Shared Ownership flats, which are unaffordable to most first-time buyers currently living in Enfield, and do not help families in need of affordable to rent housing.

For example, purchasing a 2-bed Shared Ownership flat on a current Green Belt development in Enfield requires an income of at least £67,000 per year, almost twice the average household income in Enfield.^[6, 7]

Of the 6,500 homes proposed for the Green Belt areas in Enfield it is highly plausible - based on the evidence - that these sites will not deliver any Social Rent family housing at all and will do very little to help Enfield's first-time buyers.

There are better alternatives.

Enfield needs to build more affordable homes, but there are better options than building unaffordable homes in Green Belt areas. The evidence shows that regenerated brownfield sites deliver far more Social Rent family housing and affordable housing for Enfield's first-time buyers than housing built in Green Belt areas.^[8]

Building new housing on regenerated brownfield sites also brings other benefits. These sites are often in sustainable locations and near existing infrastructure. Brownfield regeneration can help to create new jobs and bring investment into urban areas, which benefits existing residents. Investment in brownfield sites can be used to decontaminate land, create new local parks, develop better climate change protections, enhance public services, and improve access to safe active travel routes.

For example, the Meridian Water site in Upper Edmonton already has planning approval for 3,050 homes of which at least 256 will be Social Rent homes (i.e. affordable) with 3+ bedrooms.^[9] Once the scheme is complete it should have delivered at least 840 of these homes.^[10] In total around 4,000 of the homes eventually built at Meridian Water will be "affordable" homes, which is four times higher than what would be achieved in Green Belt areas.^[11]



There has already been enormous investment made in the regeneration of Meridian Water including significant infrastructure and 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, despite this enormous investment and the benefits the redevelopment of Meridian Water could bring in terms of affordable housing, employment and urban regeneration, the council has decided not to complete the scheme until 2055. ^[12]

However, even without Meridian Water, there are still sufficient brownfield sites across Enfield to deliver the housing needed over the next 20-years. More information can be found on this [here](#). ^[13]

If the council genuinely wants to build the type of homes needed by Enfield's first-time buyers and the thousands of families and children currently living in unsuitable conditions in Enfield, and which will truly help the local community, then it should follow the real-world evidence and focus its efforts and limited resources on regenerating brownfield sites. It should not allow itself to be distracted from this task by those eager to benefit from building unaffordable housing on Enfield's Green Belt.

Better Homes Enfield



REFERENCES AND ADDITIONAL INFORMATION

- 1 Enfield Local Plan Growth Topic Paper, Evidence to support the Enfield Local Plan, May 2021, p65
- 2 The council's claim about affordable housing on the Green Belt is based on a misrepresentation of a theoretical assessment. In April 2021, the council received the findings of its 'Whole Plan and CIL Viability Update', which included an assessment of the level of affordable housing Green Belt sites could potentially deliver [in theory].

This assessment did state that "*large greenfield sites are likely to be able to bear 50% affordable housing*" (12.106b). However, the assessment also noted that it had not tested specific strategic sites (2.24) this did not include "*specific estimates of the strategic infrastructure and mitigation costs for any particular sites*" (10.17) and cautioned against drawing firm conclusions (12.106g).

This means there are significant infrastructure costs unaccounted for in the council's affordability claims. These costs are likely to be high for Green Belt sites such as Vicarage Farm, which will require an enormous amount of new infrastructure, including new roads. The number and type of affordable homes delivered on these sites will substantially decrease once these costs are properly investigated and accounted for.

- 3 The Whole Plan and CIL Viability Update reported that greenfield sites could support affordable housing of "up to 50%", however the council reported this as "at least 50%" on Green Belt in its Growth Topic Paper.
- 4 Analysis of more than 17,000 homes built on the Green Belt between 2015/16 and 2019/20, found that only 10% of the homes would be defined as affordable by the government definition*. (CPRE, State of the Green Belt 2021). *The government definition includes Shared Ownership, which requires incomes 2-3 times higher than the average household income in Enfield and rarely delivers homes with 3+ bedrooms.

In 2017 permission was given to build 262 homes within the Green Belt at Trent Park in Enfield (a site adjacent to Vicarage Farm, which is one of the Green Belt sites targeted for development). Not a single one of the 262 homes will be at Social Rent levels. This means this development will not directly help any of the thousands of families and children currently stuck in temporary accommodation.

According to the council's theoretical assessment, at least 33 of the homes at Trent Park should have been Social Rent. Nor will the Trent Park development deliver any intermediate low-cost rental homes, so none of the homes built will be affordable to lower income families or most key workers.

The development will deliver a small number of Shared Ownership units (20%), only 2 of which will be 3-bedroom flats. According to the August 2021 price list for these properties the anticipated income for someone purchasing a 25% share in a 2-bedroom flat is £67,000 - £75,000 per year (<https://landgah.com/scheme/trent-park/>). The median average household income in Enfield is reported to be £35,300. (Enfield Council Borough Profile 2021, p21)

Prices for the properties at Trent Park range from £565,000 for a 1-bed flat to £1.96m for a 5-bed house.



August 2021 <https://www.berkeleygroup.co.uk/developments/london/enfield/trent-park>

A similar pattern is repeated in other recent applications for housing developments on land adjacent to Enfield's Green Belt. These developments deliver no Social Rent housing whatsoever and the large majority of the homes will be unaffordable to local people in need of help with housing costs.

5 Looking broadly at major developments on brownfield and urban area sites in Enfield over the last 10 years, 35% of the additional homes delivered were affordable and 10% were Social Rent, which is lower than what is needed but is still far higher than what is achieved on Green Belt sites (10% affordable housing overall).

Examples of recent brownfield applications and developments in Enfield:

- Exeter Road: 100% of the homes will be affordable (67% at Social Rent levels).
- Deimel Fabric Co.: 100% will be affordable to rent housing
- Meridian Water: 40% of the homes will be affordable (28% at Social Rent levels).
- Green Street: 50% will be affordable (35% at Social Rent levels).
- Royal British Legion: 37% will be affordable (25% at Social Rent levels).
- Meta Switch: 16.5% at Social Rent levels

6 See note 4

7 See note 4

8 See note 5

9 Granted planning applications for Meridian Water Phase 1 and Phase 2

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11 Enfield Council <https://twitter.com/MeridianWater/status/1430078171425165322?s=20>

12 See draft Local Plan - PL5: Meridian Water – Site Allocations, p338

13 Better Homes Enfield undercounted brownfield sites report



Appendix 1: Affordable housing in Enfield

- Rents have rapidly increased in the Private Rented Sector and as a result there are thousands of families struggling with housing costs. Many are living in overcrowded or unsafe conditions or are at risk of eviction. [a, b]
- Enfield is reported to have the highest eviction rate from rental property in London. [c]
- Enfield has one of the highest rates of temporary accommodation use in England. [d]
- There are currently 5,000 children in temporary accommodation in Enfield. Many are living in accommodation that unsuitable for their needs. [e]
- Only 33% of affordable housing in Enfield has 3 or more bedrooms. [f]
- Families in need of a home with 3+ bedrooms spend an average of 6 years in temporary accommodation, waiting for a suitable home that they can afford. [g]
- Affordable Family housing (i.e. homes with 3+ bedrooms) needs to account for around 50% of all affordable housing built in Enfield [h]
- Since 2018, Enfield has demolished more Social Rent housing than it has built. [i]
- Home ownership is becoming an increasingly remote prospect for Enfield's key workers and younger first-time buyers. Twenty years ago, a low-priced home in Enfield cost five times a nurse's average annual salary - buying the same home now costs twelve times a nurse's salary. [j]
- At least 10,500 additional affordable homes need to be built in Enfield over the next 5-years. Around 7,000 of these will need to be at Social Rent levels for families in acute housing need, who struggle to afford even the lowest cost rents in Enfield, and 3,500 will need to be 'intermediate' affordable housing for key workers (who can often afford low-cost rents but need help getting on the housing ladder). [k]

a, b: Local Housing Need Assessment (LHA) 2020, point 24, 41; c,d: Enfield Review of Homelessness 2019; e: Cabinet Report October 2019; f: LHA 2020, Figure 4.3; g: FOI request March 2021; h: LHA 2020, 6.42; i: GLA, Planning London datahub, Aug 2021; j LHA 2020, Table 3:1 Lower quartile house price; k: LHA 2020, Figure 4.3