



## No Need to Build on Enfield Green Belt

**Space to build.** CPRE London has worked with local groups [Enfield RoadWatch](#) and the [Enfield Society](#) to publish *Space to Build in Enfield* [CPRE](#). The report is based on a survey of potential brownfield sites in the borough. Alice Roberts said:

*“Our report shows that Enfield Council should not even be considering building on green belt. There is plenty of space to build new homes within Enfield’s previously developed land. We’ve already found space for 37,000 new homes and that’s really just a start.”*

*“Our research shows that building housing at Crews Hill would be the worst possible option for Enfield residents. It cannot provide affordable housing, would mean more congestion and traffic, and would destroy a cluster of much-loved businesses.”*

**Local plan.** The background to the CPRE report is Enfield council’s consultation on its draft local plan. The council wants a review of green belt boundaries arguing Crews Hill could provide “a highly accessible hub for growth supported by all necessary infrastructure” [BBC](#). Green belt land covers 37% of the borough and Crews Hill is well known for its horticultural nurseries and garden centres [BBC](#).

**Housing.** The CPRE report, a submission to the local plan review, said the borough’s housing target should be set at an “ambitious” 2,400 homes a year, not the plan’s unrealistic proposal of 3,500 a year. There are enough brownfield sites to accommodate homes without building on the green belt. Enfield should engage in more masterplanning and bring forward large sites to deliver more affordable housing. One priority should be around Southbury Station including building a new district centre away from the Great Cambridge Road with community facilities, employment space, shops and restaurants.

**Green belt.** The borough should put forward a positive plan for the Crews Hill green belt site to support the retail garden centres and “develop the area to provide London with vegetables, plants and flowers so that it is again a hub for food production.”

**Transport.** Developments should be car free and London Overground and West Anglia rail services should be improved. A new station should be built at Pickett’s Lock. Bus services and Junction 25 of the M25 should be improved.

## Holocaust Memorial



**Controversy.** The controversy over the planning application for the holocaust memorial in Victoria Tower Gardens continues. At the beginning of February, CPRE London put out an appeal for its members and supports to object to the plans [CPRE](#). Westminster council has received 696 objections and 44 expressions of support [BBC](#) [SWL](#) [G](#). More than 11,000 people have signed a petition against the scheme [chan ge.org](#).

**Support.** Eric Pickles led 174 MPs and peers in supporting the scheme [ITV](#) [BBC](#). Lord Pickles is co-chair of the UK Holocaust Memorial Foundation and called the objection by Royal Parks (below) “wrong-headed” [ITV](#). Rabbis from the nine Westminster synagogues support the project. In a letter to the Times, the designer of the monument Sir David Adjaye said [BBC](#).

*“The concerns for the preservation of the park and its purpose are understandable and have been heard. We have no desire or intent to diminish the refuge and joy that this public place provides.”*

He had earlier told the Times [BBC](#).

*“The park’s been turned into a sort of memorial garden already with monuments... So, we have the opportunity to activate the entire site and talk directly to parliament, hold it accountable. Disrupting the pleasure of being in a park is key to the thinking.”*

**Objectors.** Royal Parks said it did not support the planning application “given the impact it will have on a popular public amenity space in an area of the capital with few public parks” [Evening Standard](#). Unesco’s adviser on World Heritage Sites, [ICOMOS](#), objected saying the memorial it would “interrupt substantially” the views of Westminster Palace [ITV](#). Referring to the letter from parliamentarians, architect Barbara Weiss said [ITV](#):  
*“How many of those who signed did so in the full knowledge that they were also supporting the irreversible destruction of one of London’s most poetic parks, the permanent obliteration of protected views of Parliament, and the potential demise of a large number of 100-year-old trees?”*

The Westminster Society said the design was uninspiring and would be an attraction to terrorists. It continued: “It severely miscalculates the public space required [and] introduces unwanted turbulence in the tranquil park.” The Gardens Trust said: “The decision to favour this location was fundamentally irrational in being politically led, without reference to normal planning considerations” [BBC](#).

## Open and Green

**Parks.** James Brokenshire announced £9.7 million for local authorities to improve parks and green spaces. He also added £2.75million to the the [Pocket parks plus programme](#) and £1.2 million to the [Future Parks Accelerator initiative](#) <sup>CPRE</sup>.

**Green space battles.** The [Friends of Udney Park Playing Fields](#) in Teddington won a high court case against a planning inspector's decision to remove a designation of the playing fields as a local green space in the Richmond local plan. The judge ruled that the consultation was flawed. A developer wants to build 107 flats and a medical surgery on the site <sup>CPRE</sup>. Campaign group [Daubeney Fields Forever](#) has urged Hackney council to give greater protection to green space in its new local plan <sup>CPRE</sup>.



Image: Daubeney Fields Forever

**Healthy space.** Sadiq Khan announced 78 community projects will share £1.27m to help tackle air pollution. Projects include green pollution barriers for schools to protect against toxic air, new green spaces for housing estates, community gardens to help improve mental health and wildlife habitats in parks <sup>airq news</sup>. New research has confirmed the link between access to green space and mental health. The study of one million people suggested that those growing up with low levels of green space were more prone to substance abuse, stress-related illnesses and schizophrenia <sup>CPRE</sup>. School children in Stoke Newington have worked with an illustrator to create a map of low-pollution walking routes in the area <sup>CPRE</sup>.



Image: Clean Air for Kids

## Around the Capital

**Bromley.** The newly adopted local plan could face a legal challenge from developers. The plan aims to deliver 641 homes a year, under half the level proposed in the draft London Plan <sup>Loi</sup>.

**Camden.** The Twentieth Century Society said Nicholas Grimshaw's 1980s mixed-use development alongside the Grand Union Canal should be listed to protect the buildings from redevelopment for a five-storey mixed-use project <sup>bd</sup>.

**City.** Free public viewing space is a planning policy requirement for new tall buildings in London. This led to GLA planners to challenge the design of the proposed Tulip tower. Architects responded by offering additional space for schoolchildren. City of London planners said the public realm could not cope with the influx of visitors <sup>bd bd</sup>. <sup>Ad</sup>. The Corporation has agreed to proceed with proposals to improve safety and the setting of the Bank Junction <sup>bd</sup>.

**Croydon.** A developer has begun action in the high court against James Brokenshire's refusal of a 17-storey 222-home tower in Purley. Croydon Council and City Hall are backing the judicial review <sup>P</sup>.

**Ealing.** Plans have been approved for a 2,000-home 27-storey development on a former margarine factory in Southall <sup>P</sup>.

**Greenwich.** Sadiq Khan has decided not to intervene in the borough's refusal of plans for a 27-storey block in front of Tesco in Woolwich. Members of a local planning committee are now proposing to include the green space in a conservation area <sup>853</sup>. Greenwich council's cabinet agreed to close and fence off Royal Hill Community Garden. It wants the formerly derelict area for a housing scheme <sup>853</sup>. Sadiq Khan rejected plans for a 771-home scheme at Charlton Riverside saying: "This scheme is not of sufficient design quality, and the layout and massing leads to a poor residential environment and poor quality public realm" <sup>SHAR</sup>.

**Hackney.** The draft Hackney local plan to 2033 has been submitted to the planning inspectorate for examination <sup>H</sup>. The Acorn in Haggerston has been registered as an Asset of Community Value following an application to demolish the Victorian pub <sup>MANZ</sup>. Hackney council has implemented an Article 4 direction to prevent shops being converted to homes without planning permission <sup>Ga</sup>. A plan to replace a hub for artists with housing at Hackney Wick has been rejected by the council on the grounds the development is excessive <sup>AJ</sup>.

**Hammersmith and Fulham** council approved plans to add a glass roof extension and new public realm to Hammersmith town hall <sup>bd</sup>. The council also approved the £1bn redevelopment of the Olympia centre in west London to provide two theatres, two hotels, a four-screen cinema, a rooftop park and restaurants <sup>bd</sup>.

**Haringey** council has agreed to the North London Waste Plan. It designates the Pinkham Way site of importance for nature conservation (SINC) as suitable for a waste processing and recycling site <sup>IND</sup> <sup>Gu</sup>.





**Pinkham Way SINC**

**Hounslow.** Hounslow council has approved the third phase of the mixed-use Brentford Lock canal side development. The proposals exceed the recommended density levels in the London Plan **bd P**.



**Plans for Brentford Lock**

**Old Oak Common.** Motor dealer Cargiant, the largest landowner in the Opportunity Area, has scrapped plans to build more than 6,000 homes claiming it has been thwarted by the Old Oak & Park Royal Development Corporation **Evening Standard P Tim**.

**Redbridge.** A developer argued that no affordable housing should be included in a 25-storey development in Ilford but if houses prices rose due to the “Crossrail effect” there might be capacity for payment towards affordable homes. A planning inspector disagreed saying the decision on affordable housing “cannot be put off for another day” and breached the policies of the local plan **Appeal Case Portal**.

**Southwark.** Plans have been refused for a 1,342-home build-to-rent development on a former factory site in Bermondsey after planners objected to just 27% affordable housing and said the lower-cost homes proposed would be too expensive for “those in greatest housing need”. Planning officers also objected to the scheme's unsatisfactory design **H&P**. Thirty-five homes, eight for social rent, are proposed for a TfL owned site in Southwark Street where Sadiq Khan once said 120 homes could be built **lond set**.

**Sutton.** Wildlife activists claim the Beddington Farmlands nature reserve is in rapid decline following the construction of the controversial incinerator. Ten acres of the nature reserve along the Beddington Lane frontage were dedesignated as metropolitan open land in favour of industrial uses in the 2018 local plan **lond Brighton**.

**Tower Hamlets** council has spent nearly £1 million on planning inquiries in a year **bd**. The council approved the replacement of 44 garages in east London with a 19-unit housing block built to Passivhaus eco standards **AJ**.

**Waltham Forest** council approved plans for a 359-home development with 100% affordable housing on the site of the derelict Webbs Industrial Estate in Walthamstow. The site, which was purchased by City Hall, will include a play area and 100 trees **dve**.

**Wandsworth.** Plans have been submitted for regeneration of the York Gardens Estate and Winstanley Road Estate in Battersea. They include a 32-storey tower, 2,550 homes, new shops and a new sports centre **bd P**. Frank Gehry is to create designs for a £100m concert hall in Wimbledon **bd**. The borough's open spaces contractor is consulting on the best way to spend £316,000, which has been earmarked for improvements at Fred Wells Gardens, a pocket park and play area **lond**. It is also consulting on improvements to the Chivalry Road playground **lond**.



**Plans for York Gardens & Winstanley Road**

**Westminster.** Ed Vaizey MP, a coalition architecture and heritage minister, said the Palace of Westminster should be converted into a luxury hotel and tourist attraction and parliament moved to Birmingham **bd**. Westminster council approved redevelopment of a block between Wardour Street and Berwick Street despite objections from the Victorian Society **bd**. The brutalist Welbeck Street car park is to be demolished and replaced by a luxury hotel **2&6**. The council has deployed a Street Waste Action Team (SWAT) to tackle fly-tipping **lond**. The council is backing a £28 million scheme to pedestrianise the Strand and divert traffic onto Aldwych **lond bd**.








**Planned pedestrianisation of the Strand**

**Design.** James Brokenshire said setting up the Building Better Building Beautiful Commission was “probably the most controversial but important thing I’ve done as a minister.” Kit Malthouse said architects should “meet him halfway” on design principles **bd de**

**High Speed 2** has published its designs for the Old Oak Common station **bd** <sup>Tran</sup> **Xtra**. Media reports suggested that ministers could cancel HS2 amid rising costs **£**.



**Crossings.** Wandsworth council has announced the preferred location for the Nine Elms foot and cycle bridge. Residents in Pimlico and Westminster council remain opposed to the project   TfL revealed the failed Garden Bridge project cost £53 million of which £45 million came from public funds. Lawyers received nearly £3.5 million   



**Heathrow.** Highways England warned Heathrow that a third runway over the M25 will distract drivers. It is asking the airport to consider lengthening the road tunnel under the runway, simplifying the road layout and preventing landings over the tunnel. High court action against the government's aviation national policy statement that gave the go ahead to a third runway begins on 11 March.

**Incineration.** Dagenham and Rainham MP John Cruddas said a proposed second waste incinerator at the Riverside Energy Park should be refused on air quality grounds.



## London Plan Examination in Public

**EiP.** Three planning inspectors are conducting public hearings on the draft London Plan <sup>GREATER LONDON</sup> <sup>GREATER LONDON</sup> <sup>GREATER LONDON</sup>. This summary looks at the February sessions during which plans for 66,000 homes a year were discussed <sup>GREATER LONDON</sup> <sup>GREATER LONDON</sup> <sup>GREATER LONDON</sup>.

**Government vs the Mayor.** Secretary of state James Brokenshire has been an outspoken critic of Sadiq Khan's housing record <sup>P</sup>. But, as the MHCLG's submission makes clear, the plan can proceed on the mayor's housing assessment not the new government standard methodology. It added:

*"Once the London Plan has been finalised and published, if the housing requirement set out is significantly lower than that derived from the standard methodology in the 2018 NPPF, then the mayor would be required to work towards an early review of the London Plan to address this."*

**Housing targets.** CPRE London said it was seriously concerned that the proposed annual housing target bears little relation to the reality of housing provision on the ground. Only 32,000 homes were delivered in London in 2017/18 and a plan that calls for 66,000 dwellings a year cannot be considered sound. It said the housing target will lead to the unacceptable loss of protected open space, including green belt and metropolitan open land. It argued the lower 2016-based household projections were more objective than the 2014-based projections on which the draft London Plan is based. **Just Space** said the emphasis on the quantity of dwellings "is at best misguided and at worst dangerous." The target does not guarantee that the right kind of housing, specifically genuinely affordable social and low-rent will be delivered. Affordable housing deliverer, **Pocket Living** said the target of 66,000 homes is sound but called for housing sites **fast tracked** through the planning system to deliver 75% affordable housing. The Home Builders Federation said: "An overall target of 53,000 homes a year is a more reasonable target, albeit this is still ambitious." South East England Councils (SEEC) and London Councils said targets should be set for 15 years ahead, not the ten years in the draft plan. The Ministry of Housing, Communities and Local Government (MHCLG) wants targets for 15 to 20 years to comply with the NPPF and allow boroughs to plan. It said borough targets should be a minimum aspiration <sup>P</sup>.

**Affordable housing.** CPRE London said that just 5,500 affordable homes were delivered in 2017/18, under 20% of total housebuilding – despite a need for 65% affordable housing. It said higher strategic targets for affordable housing, particularly for social rent, are justified and should be prioritised for grant funding. CPRE called for the 50% affordable housing target in the draft plan to be firmly enforced and for the mayor to set out more clearly how the target will be met. It said a review due for 2021 should be brought forward with a view to raising the affordable housing target to 65% of all new homes. The **London Tenants Federation** said the mayor should produce a strategy to ensure the backlog of need for low-cost social rented homes is addressed in ten years. MHCLG said the plan should not enable or encourage boroughs to seek affordable housing contributions from developments of 10 units or fewer.

**Housing sites.** CPRE London welcomed the emphasis on small sites. It cites Croydon as an example of what can be achieved through a concerted effort to prioritise and facilitate the development of small sites. It called for higher housing density, faster build out rates and more use of brownfield. CPRE also wants explicit recognition of the potential for better use of excessive or redundant road space and other land, including car parks, in line with London's strategic target of reducing car use by 80% by 2040. The borough of Bromley warned that small sites would make little contribution to needed social and infrastructure. The speed of development would mean:

*"Local compromises will have to be made on such sites in terms of increased harm to residential amenity, the lowering of design standards and the prevention of boroughs being able to establish their own local policies to protect garden land."*

London Councils criticised the way housing sites were selected in the Strategic Housing Land Availability Assessment (SHLAA) and queried the assumptions behind flood assessments. As a result, boroughs might underdeliver on targets set out in the plan:

*"There is no evidence to demonstrate that the housing requirements have considered the best use of land, i.e. using brownfield sites."*

London First said the plan was overly reliant on small sites. MHCLG said the presumption in favour of infill development within the curtilage of a house – garden grabbing – should be removed from the plan.

**Housing density.** The **London Forum of Amenity and Civic Societies** (London Forum) and Just Space argued that a policy to increase the density of housing beyond town centres would leave residents without easy access to services and facilities. The Assembly Planning Committee said high density housing should be restricted to zones with a **Public Transport Accessibility Level** (PTAL) of 3 to 6. Bromley council warned that even the PTAL measure did not accurately reflect accessibility to transport.

**CPRE on the green belt.** CPRE London said "development on green belt land rarely represents sustainable development and nearly always the harm outweighs the benefits." It continued:

*"London's green belt continues to perform vital environmental functions, including managing water, improving air quality and enhancing biodiversity, as well as important social and wellbeing functions by providing opportunities for informal recreation and sporting activities."*

*"As the use of London's built up area is intensified, designated open space will only become more important for those living and working in the capital."*

*"We are concerned at a growing number of cases where release of green belt land is being considered before it has been demonstrated that all suitable previously developed sites have been identified for redevelopment."*

CPRE London said it was also "disturbed at the growing number of green belt reviews being undertaken by boroughs in outer London with the aim of finding land for housing."

## Planning and Environmental News from CPRE London

**Green belt reviews.** London First wants more flexibility for boroughs to build on the green belt and metropolitan open land:

*“The SHLAA fails to acknowledge that accessible brownfield sites and land that is of no environmental or civic value exist in the green belt, and that some of these sites could be brought forward in a sustainable manner... that would result in a better overall spatial strategy for London... The mayor should leave boroughs to review their green belt boundary if necessary through their local plan process.”*

It wants policies changed to encourage boroughs to seek sites “within the green belt and metropolitan open land, sites close to existing or future transport nodes that are of poor environmental or civic value but that could support sustainable, high-quality, well-designed residential development that incorporates accessible green space.” SEEC said the mayor should “encourage green belt review at a London-wide level – or explain his justification for not doing so.” The councils said the plan has a shortfall of 1,065 homes a year: “It cannot be assumed that wider South East authorities would be able to accommodate additional unmet housing needs from London.”

**Design.** CPRE London said it was worried that boroughs would not have enough resources to deliver area wide design codes. It said: “There is a risk that future development will erode the distinctive character of existing neighbourhoods by creating homogenous ‘anywhere’ places unless greater attention is paid to local character and diversity” especially in conservation areas. The Socialist Housing Association London argued housing is a public health issue and developments should separate homes from traffic, with access to green space and natural light.

**Sustainability.** The London Forum said the plan would not achieve the building of “strong and healthy communities” because it lacks content for achieving good proximity to facilities, services and transport. London Councils said the strategic environmental assessment did not follow the approach set out in the EU SEA Directive. “London Councils consider that the social and environmental implications of an increase in housing delivery have not been considered at all, because of [these] significant failings.” The councils also warned that the new local plan will render borough plans out of date on housing policies, triggering the presumption in favour of sustainable development and leading to unsustainable communities.


**Estate regeneration.** CPRE London said policies should be strengthened to ensure provision of affordable housing and no overall loss of amenity and open space during regeneration. Just Space said that too much social housing is being lost during regeneration and the plan should prevent this. The draft plan also tends to presume that demolition will be the default plan for estates: “We absolutely oppose this, on economic, social and environmental grounds.” The London Tenants Federation and the [Highbury Group](#) made similar points and said estate regeneration does not have to involve demolition and redevelopment. London Tenants Federation said too many social tenants are being displaced beyond London during regeneration projects.

**Housing mix.** CPRE London welcomed use of empty buildings as ‘[meanwhile housing](#)’ but warned it must not become permanent accommodation. [Footwork Architects](#) said stronger policies on meanwhile housing are needed including design. CPRE wants restrictions on change of use from housing to temporary holiday accommodation in areas under pressure and pressure on boroughs to levy the council tax premium on empty homes. The London Forum said there have been too few housing schemes for older people. Too many large homes are occupied by a single elderly person and could provide homes for families or for conversion into flats. Several submissions warn that the high housing targets and promotion of higher densities will lead 1- and 2-bedroom flats at the expense of family homes.

**The wider South East.** SEEC said its members were concerned that if London fails to achieve its housing targets, there will be increase housebuilding pressure across the South East. It said:

*“We would like to see the plan specify the mayor’s commitment to working in partnership with councils in the wider South East to help London and its neighbours overcome particular barriers to delivering market and affordable homes so that all areas can meet local needs... The wider South East has its own significant pressures... it would be wrong to assume there is capacity for the wider South East to accommodate any London overspill.”*

The East of England Local Government Association said: “There has been no explicit meaningful discussion with local authorities in the East of England in relation to their willingness to accommodate an extra 1,000 homes that cannot be accommodated in London.” The Home Builders Federation said more of London’s homes should be built outside the capital. It called for the draft London Plan to be scrapped and for a new spatial strategy. This should either export the housing shortfall to the wider South East “through a planned programme of population dispersal through new towns and urban extensions” or increasing housing targets across the South East.

**Looking ahead.** During March, the examination in public will examine design, public realm and the historic environment. Tall buildings and basements are on the agenda. Industry and the tourist economy follow, along with transport infrastructure. The EiP is back into prime CPRE territory on 26 March when green belt, metropolitan open land and green infrastructure will be debated. The panel of inspectors has asked the mayor to comment on proposals for reviews of green belt and metropolitan open land. Options might include modifying the plan to accommodate growth in these areas; encouraging boroughs to undertake reviews; the mayor committing to work with the boroughs on a rapid review; or pausing the EiP while the mayor carries out a review.  Urban greening, biodiversity and sustainable energy will follow the green belt debate.

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## The CPRE London eBulletin

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**Editorial.** Views expressed in the CPRE London eBulletin are those of the editor not of any part of CPRE. **Editor:** Andy Boddington, [cprenews@andyboddies.co.uk](mailto:cprenews@andyboddies.co.uk). **CPRE London:** 020 7253 0300, [office@cprelondon.org.uk](mailto:office@cprelondon.org.uk), [cprelondon.org.uk](http://cprelondon.org.uk).