



Strategic Planning & Design  
 Enfield Council  
 Silver Street  
 London  
 EN1 3BR

13 September 2021

Dear Sir, Madam,

## **REPRESENTATIONS ON THE ENFIELD LOCAL PLAN 2019-2039**

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We write on behalf Dominvs Group ('our Client'), to formally submit representations on the Regulation 18 Draft Local Plan, specifically with regards to the proposed draft Site Allocation SA3 (100 Church Street).

Our Client has substantial land holdings in the London Borough of Enfield ('the Council') and is keen to continue to participate in the ongoing Local Plan process. Our Client has a pipeline in excess of 150 new homes in the Borough and has a long term commitment to contribute towards housing delivery on their sites and on new sites over the Plan period. Our Client therefore wholly supports and welcomes the Council's strategic objectives to increase housing supply and 'Good Growth' in Enfield.

However, to achieve the Council's strategic targets and address their poor housing delivery record, more needs to be done to accelerate the delivery of new homes on appropriate brownfield sites, which in turn can help reduce the need for new homes to be built in the Green Belt. The Council have recently failed their Housing Delivery test, scoring 56% and being amongst the worst performers in England. Action therefore need needs to be taken.

Site Allocation SA3 is a prime example of an appropriate brownfield site with the opportunity to make a vital contribution to housing delivery in the Borough and we have discussed this in more detail within the next section of this letter.

### **a. Site Allocation SA3 – 100 Church Street**

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Our Client is the owner of 100 Church Street. They have made a detailed planning application (LPA Ref: 20/02858) for the provision of 78 new homes. The planning application has been amended since submission, following engagement with key stakeholders including Planning, Design and Conservation Officers. It will deliver a development of exemplar residential quality that meets the Council's identified housing needs.

The site is within the Enfield Town Conservation Area and full regard has been had to the impact on this important heritage asset in bringing forward the planning application. The planning policy and site context makes this a site that needs to be optimised. The site was allocated for residential-led development in the adopted Enfield Town Masterplan (see Appendix 1), it is brownfield land, it has excellent public transport links (PTAL 6a), and it is within a short walking distance of all the amenities of Enfield Town Centre (Major Centre) and Enfield Chase (Local Centre). Planning policy at all levels

supports the optimisation of residential sites in this type of location, and as detailed in the next section of this letter, there is a pressing need to deliver more high quality homes in the Borough.

In this context, to allow the Council to plan positively for the future and reduce the need to build new homes in the Green Belt, it is essential that the emerging draft site allocation for SA3 recognises the site's full potential and wider planning context when setting the residential capacity.

The draft SA3 site allocation currently proposes a residential capacity of 56 new homes. Whilst it is recognised that this number is only a guide, it falls significantly short of the 78 homes that our Client is proposing for the site as part of their current planning application. Our Client, by working with the Council and local stakeholders, is confident they have demonstrated that 78 high quality homes can be successfully accommodated on the site. This has been informed and achieved through extensive technical assessments, together with an exemplar architectural design approach.

Ensuring appropriate brownfield sites are optimised is particularly relevant given the Council's position with regards to their recent Housing Delivery Test results. The Council's housing delivery performance over recent years has been very poor (illustrated in Table 1) and this is having a direct impact on the affordability of housing for local people. This cannot continue and the Council require sites such as SA3 to be optimised if this trend is going to be reversed. We have provided further commentary on this important issue in the next section of this letter.

## b. Housing Delivery

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### Overall Need

The Government's standard method, using the latest data, shows a need for delivery of 85,500 homes per year (rounded) across London. For Enfield, it shows a need for 2,355 homes per year. The mechanics of the local housing need ("LHN") calculation are shown in the Figure below.

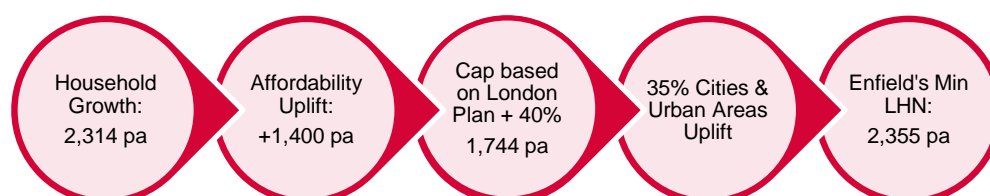


Figure 1: Enfield's Local Housing Need (homes per annum)

In effect, because of the effect of the cap within the standard method, the LHN of 2,355 homes per annum is derived by firstly applying a cap which constrains the housing need to 40% above the London Plan requirement before then applying a further 35% 'cities and urban centres' uplift to this. As the Figure shows, this results in an LHN figure which is only modestly above the projected household growth (by 2%). Provision at this level would thus make no real contribution to improving affordability.

The Enfield Local Plan needs to be in general conformity with the London Plan, the latest iteration of which was published in March 2021. The London Plan was prepared and examined against the context of the 2012 National Planning Policy Framework. The GLA's 2017 London SHMA identified a need for 66,000 additional homes a year across London. It is notable that this falls below the assessment of need using the standard method which is for 85,500 homes per year across London – the aggregate need is now thus assessed as 30% greater.

The London Plan under Policy H1 (together with Table 4.1 in the Plan) sets 10 year housing targets that Boroughs should plan for and seek to deliver. These were set based on the capacity identified in the 2017 London SHLAA. Across London, the Plan makes provision for 522,870 homes over the 2019/20 – 2028/29 period, equivalent to almost 52,300 homes per annum. Notably, this falls substantially (over 20%) below the housing need as assessed as part of the London Plan's

preparation, and if these targets are achieved in full would meet just 61% of the assessed need using the standard method across London.

Through the London Plan process, the Secretary of State has been highly critical of London's housing delivery performance and London's failure to meet its housing need. In his letter to the Mayor of 13<sup>th</sup> March 2020, the Secretary of State described recent housing delivery in London as deeply disappointing falling short of the previous London Plan target and identified housing needs; and pointing to growing affordability pressures and a housing delivery shortfall. He was strongly critical of the failure of the new London Plan to fully meet London's housing needs and was outlined that this would have clear social consequences and "will exacerbate the affordability challenges within and around the capital."

The Framework (paragraph 22) requires strategic policies in Local Plans to look ahead over a minimum 15 year period from adoption. Enfield's Local Plan therefore needs to look beyond 2029. The Local Plan (paragraph 4.1.11) outlines that if a target is needed beyond the 10 year period, Boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity, in consultation with the GLA, and any additional committed transport infrastructure, and roll forward capacity assumptions for small sites.

However, such an approach is arguably not consistent with national policy and invariably compounds the issue between the number of homes that the London Plan sets out to deliver against the need identified by the standard method. Indeed, the Secretary of State's letter to the London Mayor, dated 29th January 2021, makes clear an expectation that the Mayor starts work on a new London Plan to bridge the significant gap between the housing which the 2021 Plan seeks to deliver and "the actual acute housing need London faces." Government's message of the need to plan for higher housing delivery in London and to increase delivery substantially cannot be clearer.

Enfield's Housing Numbers Topic Paper (May 2021) drills into questions of the appropriate basis against which the Council squares issues of consistency with national policy and general conformity with the London Plan in setting the housing requirement. It outlines that the standard method is 4,373 homes per annum (uncapped) or 2,355 homes per annum (capped). As the capped need barely exceeds the household projections and would therefore unlikely contribute to improving affordability, there is a clear basis for testing the potential to deliver higher housing delivery through the plan-making process and for this to contribute to sustainable development.

The Council's Housing Numbers Topic Paper outlines that Local Plan has a period looking to 2039, whereas the London Plan targets run only to 2029. Stantec, the authors, found the London Plan did not provide clear basis for considering what requirement to adopt given plan looks to 2039. Stantec recommended that a roll forward of the London Plan scenario be considered (36,010 homes when applied to the plan period to 2039); as well as considering the standard method for the Borough. The latter generates a figure of 56,190 homes.

The Council has interpreted this through its Housing Topic Paper (May 2021) to generate a number of options in respect of overall housing provision identified in the Plan:

- Option 1: Baseline Housing Target – 17,000 homes – 1246 dpa London Plan requirement to 2029 and then 500 dwellings thereafter based on the London Plan SHLAA 2017
- Option 2: Medium Growth – 25,000 homes – based on the 1246 London Plan requirement to 2029 extended from 2029 to 2039.
- Option 3: Higher Growth - 55,000 homes – based on the London Plan target to 2029 and applying the standard method thereafter.

This is clearly a complex area, with a degree of conflict between issues of 'general conformity' with the London Plan and the need for the Plan to be consistent with national policies in the NPPF so as to be sound. In our view, it is evidently not appropriate to treat the London Plan requirement as a cap or limit to provision (either to 2029 or extended to 2039). Indeed, the Secretary of State himself has

emphasised the need for consideration of how higher levels of housing provision can be achieved in London and the need to improve affordability in the Capital.

The reality is that the London Plan requirement is a constrained figure. Indeed it falls below household growth projected for Enfield even before any consideration is given, as per national policy, to improving affordability. Nor forms part of a redistribution in which these needs are in effect met elsewhere in London. London overall falls well short of meeting its housing needs.

The Council's proposed approach under Policy H1 in the emerging Local Plan is the Option 2 scenario of rolling forward the London Plan requirement. Whilst we recognise the benefits of consistency of this with the London Plan, we would note this level of housing provision meets just 53% of the assessed minimum LHN for the Borough, leaving a substantial shortfall of over 22,000 dwellings. The proposed approach of planning on this basis thus fails to meet the Secretary of State's clear expectation of increasing housing delivery across London – to levels above those in the recent London Plan – and of improving affordability. It would see affordability worsen, which does not represent sustainable development.

The implications of delivering substantially below housing need are significant across a range of issues. This includes worsening affordability and an overall inability to meet the most acute needs by delivering sufficient levels of affordable housing. As a result, consideration should be given to the potential to meet housing need within the Borough (i.e., Enfield meeting its standard method housing need) (Option 3).

### Completions and Housing Delivery Test Performance

Historically, the Borough's overall housing delivery performance has been notably poor. The Council has published data on housing completions over the period from 2008/09 up to 2019/20 and we have set out the delivery performance of the Council against the corresponding London Plan housing target in the Table below.

Year	Completions	Target	Shortfall
2008/09	333	395	-62
2009/10	277	395	-118
2010/11	455	395	60
2011/12	297	560	-263
2012/13	550	560	-10
2013/14	512	560	-48
2014/15	399	560	-161
2015/16	674	798	-124
2016/17	884	798	86
2017/18	389	798	-409
2018/19	500	798	-298
2019/20	420	798	-378
<b>Total</b>	<b>5,690</b>	<b>7,415</b>	<b>-1,725</b>
<b>Last 3 Years</b>	<b>1,309</b>	<b>2,394</b>	<b>-1,085</b>

Table 1: Enfield Housing Completions v Corresponding Target, 2008-20

The analysis of housing completions over the last 11 years shows that **consistent under-delivery has resulted in a cumulated shortfall of 1,725 homes**. In other words, the Council has failed to deliver 23% of the housing required over this period when set against the corresponding London Plan housing targets. It is also evident that housing delivery has been particularly poor over the last three years, achieving only 45% of the housing target. There is a clear need to reverse this trend by bringing forward sites which can deliver quickly in the short-term.

The implication of the Council's recent delivery performance is brought into sharp focus when considered in the context of the Housing Delivery Test ("HDT"). The Table below considers the last three measurements of the HDT and demonstrates that despite the housing requirement reducing –

albeit marginally – the number of homes delivered in the preceding 3 year period has reduced significantly. There is a clear, and urgent need to boost housing delivery in the Borough.

Year	Total Homes Required	Total Homes Delivered	HDT (%)
HDT 2020	2,328	1,314	56%
HDT 2019	2,394	1,839	77%
HDT 2018	2,355	2,003	85%

Table 2: Housing Delivery Test Results by Measurement Year, 3 Year Period

The Council has moved from a position in 2018 where the only consequence was the need to prepare an Action Plan to a position in 2020 where the presumption in favour of sustainable development applies. As directed by the National Planning Policy Framework, where housing delivery falls ‘substantially below’ the housing requirement – which is a threshold of 75% - the titled balance in NPPF Para 11d is engaged whereby planning permission for development should generally be approved unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The purpose of this is to reflect the urgent and support the urgent need to increase the delivery of homes.

The Council’s performance is worsening and there is a clear need to identify and intensify sites which are available, achievable and suitable now in order to reverse the trend of poor housing delivery.

#### Optimising Brownfield in Short-Term

Looking forwards, the Council clearly has to bring forward both brownfield development sites and greenfield sites in order to achieve mixed and balanced communities; however, from a housing land supply perspective, it is in invariable that brownfield land has a greater role to play in the short-term in order to ensure that the Council can demonstrate a five year supply of housing land and boost overall housing delivery.

In supply terms, identified Green Belt sites which are proposed as draft allocations in the emerging Local Plan will have a greater lead-in time owing to the fact that they are unable to be consented prior to the adoption of the Local Plan without demonstrating that Very Special Circumstances exist. Indeed the Council’s Housing Trajectory does not have then contributing to delivery before 2030.

The Council’s latest Local Development Scheme (December 2020) anticipates adoption of the Plan in 2024 and as a result, there is an urgent need to ensure that committed and allocated brownfield sites in the Council’s trajectory are maximised in terms of development capacity to contribute to addressing the urgent need to increase housing supply in the short-term.

#### c. Summary

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These representations on the Regulation 18 Draft Local Plan have been made on behalf of Dominvs Group and specifically refer to the proposed Site Allocation SA3 (100 Church Street).

Whilst Dominvs fully supports the strategic objectives of the Draft Local Plan, namely to increase housing delivery in the Borough, more needs to be done to ensure that appropriate sites are fully optimised in accordance with National and Regional Planning policy.

Specifically with regards to draft Site Allocation SA3, our Client requests that the proposed residential capacity is reviewed to fully acknowledge the site and policy context, and increased to reflect the planning application that is currently being considered by the Council for 78 dwellings. Dominvs have demonstrated that this number of units can be successfully accommodated on the site and this has been informed by positive pre and post-application engagement with officers.

The Council’s housing delivery performance over recent years has been very poor, which is reflected in their recent Housing Delivery Test score of 56% and being one of the worst performers in England. The lack of housing delivery is now having a direct impact on the affordability of housing for local

people. This cannot continue and the Council require sites such as SA3 to be fully optimised if this trend is going to be reversed.

We trust that these representations will be taken on board as the Local Plan consultation and review process moves forward, and we look forward to receiving further updates on the progress of the Local Plan in due course.

Yours sincerely,

5.7 CENTRE WEST

SITE 17 & 18 - METASWITCH & OLD PARK AVENUE

- **Key principles and land uses**  
Should this prominent site come forward, it is appropriate for a mix of use including residential, offices and potentially commercial leisure.
- Land to the south and fronting Old Park Avenue is most appropriate for residential uses.
- Redevelopment of the site should not result in any loss of jobs in Enfield.

**Form of development**

- The Metaswitch site falls within the Enfield Town Conservation Area although the building itself makes only a neutral contribution to the character of the conservation area.
- The existing Metaswitch office building does, however, contribute positively to an office campus character.
- New development fronting Church Street should respect the scale of and views to key landmark churches either side of the site. Views to these churches play an important role in establishing the character of the conservation area.
- The scale of development on the Old Park Avenue frontage should respect existing dwellings but there will be an opportunity for a taller form of development in the south east corner of the site.
- Buildings should address the river front in a positive manner.

**Access and movement**

- The site's principal vehicular access will continue to be taken from Old Park Avenue.
- Improvements arising from the development of this site to the riverside path through Town Park would be welcome.

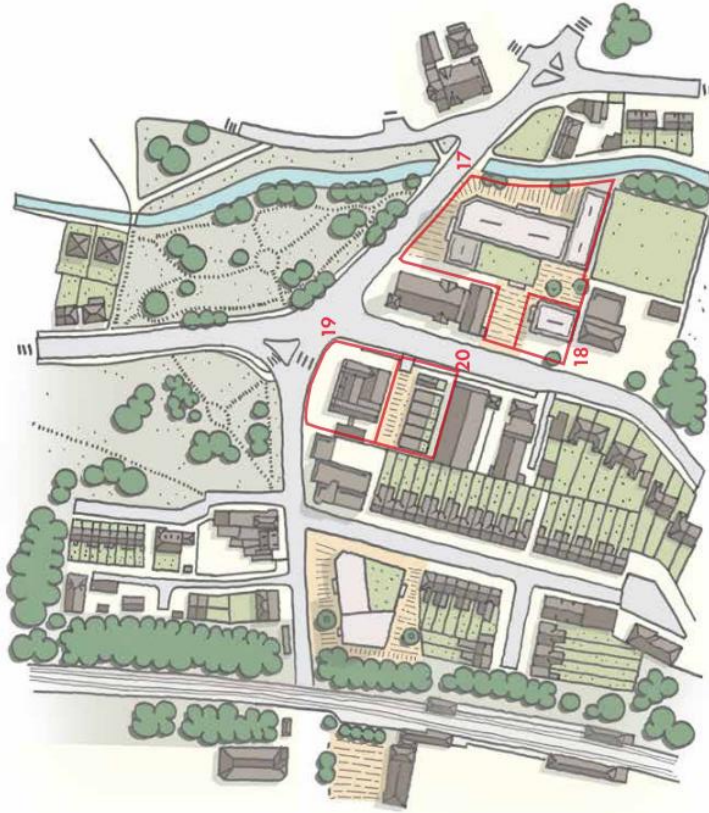
**Public realm**

- The existing trees are a major environmental asset and should be retained in any redevelopment. A TPO is protecting a Sycamore tree on Old Park Avenue.
- Access to the New River path should be maintained and where possible improved.

SITE 19 & 20 - MAGISTRATE'S COURT BUILDING & LAND TO THE REAR

**Key principles**

- The Magistrate's Court building is locally listed and makes a very significant and positive contribution to the character of this part of the Enfield Town Conservation Area.
- If viable, the building should be retained and reused for uses which make a more significant contribution to the town centre economy.
- Appropriate uses would include restaurant and/or cafe uses at the front.
- There may also be scope to incorporate flexible business space within the building which would help to support local businesses and could have a catalytic effect on the area.
- A feasibility study including a survey of the existing building will be required. This will help to inform a view on the viable and appropriate uses of the building. Such a study should consider, at a high level, the range of potential new uses for this attractive building including commercial, workspace and potentially residential conversion.
- The land to the rear would be appropriate for housing development which could help to cross fund the re-purposing of the Magistrate's Court building.
- Respecting the amenities of existing residents on Shirley Road which back on to the site will be an important consideration.



Above: Centre West development roof plan. Indicative only.  
ENFIELD TOWN Masterplan Framework February 2018