



## Enfield Local Plan Advice

Housing numbers in the emerging plan

On behalf of **London Borough of Enfield**

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Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU  
Office Address: 78 Cowcross Street, London, EC1M 6EJ  
T: +44 (0)20 38246600 E: PBA.London@stantec.com

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<b>Prepared by:</b>	HDH/RJP	DIR/DIR	HDH/RJP	080321
<b>Reviewed by:</b>				
<b>Approved by:</b>				
<b>For and on behalf of Stantec UK Limited</b>				

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## Contents

- 1 Introduction..... 1**
- 2 London Plan Targets for Enfield..... 3**
  - 2.2 Summary ..... 9
- 3 Other Considerations..... 10**
  - 3.1 Introduction ..... 10
  - A roll on London Plan target (1,246 dpa) ..... 10
  - 3.2 Standard Method..... 11
  - 3.3 Summary and Scenarios ..... 13
- 4 The need for a Housing Needs Assessment ..... 16**

## Appendices

Appendix A

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# 1 Introduction

## Background

- 1.1.1 Enfield is required, as with most Councils in England, to publish and keep up to date a Local Development Plan. As with every Council the development plan must follow national policy and guidance as set out in the most recent version of the National Planning Policy Framework (NPPF). However, in London the local plan also needs to be in '*general conformity*' with the London Plan. In London, unlike the rest of England, a two tier plan system remains<sup>1</sup>.
- 1.1.2 The London Plan is a statutory strategy required by the Greater London Authority Act 1999. It is prepared by the Mayor of London and published by the Greater London Authority. The first London Plan was published in 2004, replacing previous strategic planning guidance for London known as RPG3. The latest edition was published in March 2021.
- 1.1.3 The most recent version of the London Plan was ultimately found sound and published in March 2021. However; it is fair to say that the Plan had a troubled Examination and was subject to major modification on the advice of the Planning Inspectors and ultimately Government. As we discuss in more detail below the plan, as submitted, had broadly enough housing land supply to meet the Mayor's view of 'need'. But as the plan passed through examination it became clear that the GLA's estimate of supply was not robust and the final version of the Plan has fewer homes than 'needed'. The Plan's employment land strategy was particularly challenged because many occupied sites were proposed to be used for housing exacerbating the shortage of industrial sites in London.
- 1.1.4 The latest version of the London Plan covers the period up to 2041 but as we note in section 2; only provides housing targets for the first 10 years of the London Plan period. Even these targets are due to be reviewed within 5 years of the plan adoption.
- 1.1.5 A general principle of plan making is that we should always seek to provide sufficient land to meet housing and economic needs in full. However, for London it is generally accepted that the London Plan fails to balance the need for new homes in London with supply. This is even on the Mayor's own assessment of 'need' (as set out in the 2017 SHMA). But the London Plan also fails to meet economic needs with the Inspectors concluding that the Industrial Strategy was unsound and the Mayor should start to consider Green Belt releases to address both economic and housing need. (Greenbelt releases are generally considered to be a strategic, so London, matter – rather than something on which the boroughs should go their own way).
- 1.1.6 Finally; it is also the case that the London Plan predates the most recent set of national policy and guidance and was examined under now superseded guidance. This is important for the future consideration of housing numbers because the London Plan, and ultimately the housing target 'awarded' to Enfield (1,248 dpa over the 2019-2029 period) was 'framed' by an assessment that had concluded London 'needed' 66,000 dpa per annum. But in December 2020 Government increased this to 95,000 and it is this higher number that the Mayor will need to start considering as part of the legal duty to review, and keep up to date, the London Plan.

## Our Brief

- 1.1.7 We have been asked to advise on the future housing target for the Enfield Plan which takes into account conformity with the London Plan but also the NPPF and associated guidance.

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<sup>1</sup> Two tier plans were common before the abolition of the Regional Spatial Strategies

- 1.1.8 As noted above the London Plan had a troubled examination with housing and economic at the core of the problem. Until very recently it was unclear whether the Plan would pass examination and if so with what housing targets for the Boroughs.
- 1.1.9 The London plan was originally submitted in 2017 with 1,876 dwellings per annum (dpa) as a draft target for Enfield (2019/29). The overall London Plan targets were actively challenged with some arguing for more homes, others for fewer. But in October 2019, for Enfield (and other boroughs), the Inspectors recommended a reduction in housing targets due to concerns that the GLA had erred in their assessment of supply. In summary the Councils could not deliver the number of homes in the draft plan because the GLA's assessment of available supply was not sound. As a result, Enfield's target was proposed to be reduced to 1,246 dpa.
- 1.1.10 Between October 2019 and February 2021 there was a series of formal letters being passed between the Mayor and the Secretary of State and formal 'directions' being issued by the SoS. This reduction to 1,248 dpa for Enfield was confirmed in March 2021 with the publication of the London Plan.
- 1.1.11 Now the Plan has been published some of the future uncertainty has reduced. But, for reasons we discuss below, the London Plan does not provide a clear answer to the 'critical issue' of how many homes Enfield needs to identify in its next 15 year plan period. This is because the London Plan only provides targets for Boroughs up to 2029.
- 1.1.12 In this note we look at two particular issues relevant to the emerging plan. Firstly, the potential Enfield housing target – recognising that the London Plan provides targets for only 10 years of the London Plan period.
- 1.1.13 Secondly the need, rationale and practical implication of a Local Housing Needs assessment. We understand that the GLA have queried why the Borough, in 2019, commissioned a Local Housing Needs assessment for Enfield (from AECOM & Arc 4 Consultants) where the London Plan *suggests* this evidence is not needed and the Council should instead look to rely on alternative evidence from the GLA's strategic 'suite'.

## 2 London Plan Targets for Enfield

- 2.1.1 On 29th January 2021, the Secretary of State for Housing Robert Jenrick approved the Mayor's New London Plan. The Mayor formally published the Plan on 2nd March 2021.

### Need vs requirements and targets

- 2.1.2 Before looking in detail at Enfield's housing requirement it is important to set out the difference between a housing need figure and a requirement or target. Also to set out how the Borough plan needs to 'conform' with the London Plan.

#### Housing Need

- 2.1.3 When arriving at a housing target in a development plan (including the London Plan) the starting point is an assessment of 'need'. This is a 'policy off' assessment of how many homes are 'needed'. This assessment is driven by demographic projections and other adjustments as prescribed in the Planning Guidance.
- 2.1.4 The London Plan assessed its need, including that of the Boroughs, using a process called 'Objectively Assessed Need' or OAN. This process was replaced by the 'Standard Method' shortly after the London Plan was submitted for Examination – but the London Plan was allowed to proceed under transitional arrangements.

The assessment of OAN is blind as to a councils ability to meet its need via a supply of sites.

#### 2.1.5 Housing Requirements (or plan 'targets')

- 2.1.6 Once the Council (or the Mayor in London) has identified the correct 'need' this is used as the starting point for identifying a supply of sites. This includes 'flexing' local policies to close any gap between 'need' and supply.
- 2.1.7 The final 'number' set out in the Plan is the 'Target' or 'Requirement'. This should ideally be the same as the starting 'need' figure. But this is not always the case. Where the target is adopted below 'need' Planning Policy and Guidance encourages early review of plans to try, as quickly as possible, to ensure that need is met in full<sup>2</sup>.
- 2.1.8 In summary, the London Plan provides the Borough with a 'requirement' or 'target' up to 2029 and arguably (as discussed below) beyond. It does not provide the boroughs with any view of Borough level 'need' up to 2029 or beyond.

#### Conformity (and General Conformity)

- 2.1.9 In this note we discuss the need to for the Enfield Plan to 'conform' with the London Plan. This flows from a legal requirement for the Enfield Plan to be in 'general conformity' with the Strategic London Plan.
- 2.1.10 There is no requirement for the Plans to perfectly conform with each other. But there is also no statutory definition of 'general conformity'; whether or not a plan generally conforms is a matter of judgement.

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<sup>2</sup> There are occasions where a target can be in excess of 'need'. For example, where a Council may wish to build more market housing to secure more affordable housing.

- 2.1.11 For the purposes of this paper we focus on how the Borough should look to apply the London Plan housing targets while not speculating how much leeway may be available to depart from these while still 'generally' conforming.
- 2.1.12 In our view the housing targets in the London Plan are a key policy that is both quantified and also detailed. The scope to adopt a dramatically different number, while still looking to 'generally conformity' is likely to be challenging.

## London Plan approach to housing targets

### Introduction

- 2.1.13 As noted above; the London Plan proceeded to assess its starting point (its 'need' for housing) using a process called Objectively Assessed Need (OAN).
- 2.1.14 For London as a whole the 2017 London Strategic Housing Market Assessment (SHMA) calculated the OAN as 66,000 dpa.
- 2.1.15 This number was calculated, presented and used at a London wide level. The Mayor maintained that London was one 'Housing Market Area' and need could and should be distributed according to planned supply across the Boroughs. The published 2017 SHMA provides no borough level 'need' figures. Only the London wide 66,000 is presented.
- 2.1.16 Once this OAN was determined the Mayor, following the two step approach above, looked for supply. This was done through the 2017 Strategic Land Availability Assessment (SHLAA).
- 2.1.17 Importantly; the reconciliation process of 'need' and 'supply' was not undertaken at the Borough level. For London as a whole the SHLAA identified capacity for most, but not all of the 66,000 homes 'needed' for first 10 years of the plan period. As submitted the separate Borough targets roughly summed to the 66,000 homes (1.5% short over the London Plan period).
- 2.1.18 This process is summarised in the SHMA (para 0.2):
- "All of these estimates [of London Need] are provided at the Greater London level only. Local housing provision targets are set out in the London Plan, based on the estimated capacity for new homes in each London borough as reported in the accompanying Strategic Housing Land Availability Assessment (SHLAA)*
- 2.1.19 While the submitted plan broadly balanced need/supply the Inspectors found elements of the 2017 SHLAA unsound (part of the allowance for 'small sites'<sup>3</sup>) and ultimately removed this component of supply. The Inspectors then adjusted borough targets downwards.
- 2.1.20 So, as drafted the submitted London Plan supply summed to 40,000 dpa on large sites and 24,500 on small sites (i.e. just short of the 66,000 dpa need). But following the Panel report the London small site supply, the component based on GLA modelling, was deleted and the small site supply cut to 12,000 dpa.
- 2.1.21 So, even were the Mayor satisfied that the submitted London Plan had enough supply to meet need. With the Inspectors reducing the SHLAA supply – removing part of the modelled small sites allowance - the final London Plan can no longer claim to meet 'need' in full even on its own terms.

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<sup>3</sup> See paragraph 170 of the Panel Report: "Briefly the modelling of small sites is insufficiently accurate to give a true picture of the likely available capacity. As such, it does not provide a reliable input to the overall targets"



## 10 Year Targets and the London SHLAA

- 2.1.22 Plans are generally expected to provide sufficient supply to cover their plan period. I.e. upto 2041. But there is provision in the NPPF for Councils only to identify sites upto year 10. The NPPF states that Councils should allocate sites post year 10 *'where possible'*<sup>4</sup>
- 2.1.23 When assessing supply the London SHLAA looked over the whole London Plan period (up to 2041) but focused only on the first 10 years (2019/29). In response the London Plan only provides Borough level targets up to 2029 – aligning with the detailed part of the SHLAA.
- 2.1.24 This is justified by the Mayor (para 0.0.13) because:

*“This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London’s development to inform decision making. However, some of the more detailed elements of the Plan, such as the annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London’s land market, does not attempt to robustly identify capacity beyond 2029.”*

- 2.1.25 In summary the Mayor declined to provide Borough level targets post 2029 because the 2017 SHLAA could not confirm the supply of sites due to the ‘dynamic nature’ of the London Market.

## Targets post 2029

- 2.1.26 Borough level targets are not provided in the London Plan post 2029. But the Boroughs are required, following National Guidance, to address a 15 year period from the point of plan adoption. Even were a Council to adopt a new plan today the London Plan targets don’t even last 8 or so years of the 15 year period.
- 2.1.27 This presents all Boroughs with a challenge: *how much land to allocate post 2029 and on what basis should these allocations be made?* The London Plan provides no Borough ‘need’ figure post 2029 and the SHLAA, as clearly set out, only focused on the period up to 2029.
- 2.1.28 Some limited guidance is provided in the London Plan where the supporting text states (4.1.11):

*“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”*

- 2.1.29 The paragraph could be viewed as slightly disingenuous because at the Borough level local plan Inspectors have concluded a target post year 10 (2029) is required. Setting this aside-paragraph 4.1.11 would suggest that Enfield can derive its post 2029 targets by interrogating the 2017 SHLAA, supplemented with additional local evidence, and carrying forward the remaining (sound) element of the original SHLAA small sites adjustment.

## Enfield’s Housing Target in the London Plan 2019 - 2029.

- 2.1.30 As noted above only 10 year (2019/29) targets are provided for Boroughs in the London Plan. The initial 10-year housing target for the London Borough of Enfield was for a total of

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<sup>4</sup> NPPF Paragraph 67.

18,760 (1,876 per annum). Of this total 9,047 dpa were on 'large sites' (over 0.25) ha and the balance on small sites.

- 2.1.31 Following the Inspectors Panel report, and the removal of one element of the small sites assessment Enfield's target falls to 12,460 over the 10 year period.
- 2.1.32 As a recently adopted, sound Plan, there is little scope for Enfield to query this target. In *theory* the 2017 SHLAA confirmed the supply up to 2029 and the London Plan confirmed the requirement for homes in Enfield up to 2029.
- 2.1.33 To remain in conformity with the London Plan at least these many homes are needed over this period; including any backlog being 'made good' within this period.
- 2.1.34 We understand the Borough raised a number of objections to the SHLAA as part of the London Plan examination and despite the SHLAA showing theoretical supply testing at the Borough level suggests this may not be case. But the case remains that the London Plan has now set the requirement and if the ultimate Enfield plan cannot provide 12,480 homes by 2029 the local plan would fail to conform and could be found unsound at local examination.

**Post 2029**

- 2.1.35 It is useful to break paragraph 4.1.11 into its constituent components and remember that the London Plan is directing Borough housing targets (requirements) and NOT 'need'. Boroughs do not consider 'need' as part of the paragraph 4.1.11 assessment.

**A) "boroughs should draw on the 2017 SHLAA findings [for large sites]"**

- 2.1.36 For London as a whole the SHLAA focused on the period up to 2029 but also provided indicative capacity for the post 2029 periods (Phase 4 & 5 of the SHLAA).
- 2.1.37 But; for Enfield, the SHLAA shows almost zero supply in these later phases.
- 2.1.38 The table below is taken from the London SHLAA (table 10.1). It shows the profile of the large site supply across the London Plan period.
- 2.1.39 Phases 4 & 5 are post 2029 and so can be used to estimate the post 2029 target. Phase 4 is 5 years long (April 2029/ March 2034) while phase 5 covers 7 years (2034-2041)

**London Plan SHLAA Supply by Phase (large sites – table 10.1)**

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Total
<b>Enfield</b>	731 7%	4,049 37%	4,638 42%	761 7%	814 7%	<b>10,993</b>
<b>London</b>	79,609 12%	224,154 33%	176,489 26%	122,233 18%	72,202 11%	<b>674,687</b>

Source: 2017 SHLAA.

- 2.1.40 This would suggest that there is only capacity for **761** homes for Enfield to roll into the paragraph 4.1.11 assessment for the 5 years post 2029.
- 2.1.41 For the phase 5 period there are **814** homes.
- 2.1.42 Per annum this would provide for **152** for the five years April 2029 – March 2034 and **116** dpa for the seven year period ending March 2041.

**B) and any local evidence of identified capacity, in consultation with the GLA**

- 2.1.43 Turning to this 'step' the Boroughs are expected to 'top up' their supply using local evidence.
- 2.1.44 To do this a local SHLAA is needed – because as noted above- the GLA effectively only focused on the period up to 2029 on the basis that post 2029 the market was 'too dynamic'. Our reading of the Panel Report would also suggest that they expected local SHLAAs to be undertaken (para 151<sup>5</sup>)
- 2.1.45 But; as we discuss in more detail below, the London Plan is so constructed to make it very hard for the Boroughs to identify additional supply within the strategic constraints of the London Plan. Most obviously new Greenfield and Green Belt sites.

**Enfield SHLAA**

- 2.1.46 The London Plan is explicit that the 2017 GLA SHLAA should be used when applying paragraph 4.1.11. But this can be 'topped up' by local evidence of additional capacity.
- 2.1.47 In the Enfield context local evidence struggles to confirm sufficient supply to meet the London plans 10 year targets. It is very unlikely significant additional supply can be identified over and above this. The main reason is that the adopted London Plan constrains the Councils ability to identify more sites.
- 2.1.1 The Borough SHLAA concludes that there is a 10 year supply of deliverable and developable sites, plus windfalls, for 10,475 homes. But this SHLAA period runs from 20/21 up to 30/31 whereas the London Plan target commences in 2019/20.
- 2.1.2 We understand that once 'backlog' is considered from the start of the London Plan period (19/20) the gap between the SHLAA supply and the London Plan requirement will be even larger. We understand that the Housing Delivery Test recorded 19/20 completions were 429 homes. So in one year alone the Borough has developed a 1,000 dwelling backlog against the London Plan. Outside London Councils have the 'ability' to reset their base date and so reset any backlog. But this route would not appear to be available to a Borough that needs to conform with the London Plan where the housing targets clearly commence in 2019.

**Greenbelt and other constraints**

- 2.1.3 As noted above the Boroughs SHLAA struggles to identify additional housing supply in the context of the London Plans strategic policy constraints.
- 2.1.4 Here the most obvious constraint is the Greenbelt and Metropolitan Open Land (MOL).
- 2.1.5 The Greenbelt was an ongoing point of disagreement between the Mayor and the Inspectors examining the plan. Greenbelt is a highly charged issue and the Mayor, when drafting the Plan, looked to accommodate London's growth without using greenbelt land. The original drafting of Policy G2 (the London Plan Green Belt policy) would have prevented Boroughs even considering releasing Greenbelt land.
- 2.1.6 In theory; because of the way the London plan targets were derived boroughs should be able to accommodate their targets without using new land and without resorting to Green Belt sites. But the Inspectors removed the Mayors original policy wording – replacing it with text more in line with the NPPF. This allows for the release of greenbelt in 'exceptional circumstances'.

- 2.1.7 Very little, if any further guidance is given in the London Plan as to when Boroughs may move into Greenbelt. However, in the economy chapter of the London Plan the text reads (paragraph 6.4.8):

*“Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London’s Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.”*

- 2.1.8 This was a very late change to the plan and was required to be added by the SoS in December 2020. This may explain why this is the only mention of Boroughs releasing land to meet housing needs. But it confirms that regardless of the main ‘no greenbelt release’ thrust of the London Plan Boroughs may be required to review their strategic constraints (inc. Green Belt) if they cannot meet their London Plan targets.

- 2.1.9 In 2021, a further call for sites exercise was undertaken. Some limited additional capacity that is not within the greenbelt or on greenfield sites have been identified. This will be considered through the borough’s HELAA. Initial estimates suggest that these sites may have capacity for an additional 1,500 homes. A more accurate estimate will be calculated as part of the HELAA update.

**C) should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements**

- 2.1.10 Regarding the committed transport improvements Cross Rail 2 was expected to pass through Enfield and also result in an increase in capacity along the West Anglia Line (four tracking the line). This may have provided additional capacity that could be applied as part of a 4.1.11 assessment but we understand the project is ‘shelved’ as part of TfL’s Covid response and gap in funding.

**D) and roll forward the housing capacity assumptions applied in the London Plan for small sites**

For Enfield the London Plan (table 4.2) shows 3,530 ‘small sites’ homes or 353 per annum.

**The Enfield Target post 2029: A+B+C+D**

- 2.1.11 There are two components of post 2029 targets prescribed by paragraph 4.1.11 directly drawing on the London SHLAA.
- 2.1.12 Component ‘A’ is the 2017 SHLAA residual. This is 152 dpa for the first five years post 2029 falling to 115 dpa thereafter. This may be supplemented by additional local evidence for component B & C where the Borough SHLAA or other evidence identifies more supply. But at the moment this appears unlikely.
- 2.1.13 Component D is also drawn from the London SHLAA and London Plan policy regarding small sites. This shows 352 dpa post 2029.
- 2.1.14 This suggests; in the absence of additional local evidence, the housing requirement for Enfield post 2029 falls from 12,460 homes up to 2029 and thereafter 504 per annum or, post 2034, 467 homes per annum.
- 2.1.15 Following the logic set out in the GLA SHLAA and London plan this should be achievable and deliverable within the strategic constraints set out in the London Plan. The reason the Enfield target falls is directly related to the lack of supply in the 2017 SHLAA.

- 2.1.16 But paragraph 6.4.8 would still suggest that if this is not the case than additional land may be needed to meet the London Plan targets. The December 2020 Ministers Direction clearly raises the prospect of a local Green Belt review “to accommodate their London Plan housing target”.

### **Employment need**

- 2.1.17 Before concluding it is worth briefly considering economic needs and specifically industrial land. When making their Direction in December 2020 the SoS justified the paragraph 6.4.8 amendment to provide Councils with the option to use employment land to meet housing need. This was given as an option alongside Green Belt release:

*“Boroughs facing decisions about releasing Green Belt or MOL to accommodate housing need, should have the option of allocating industrial land to meet these needs”<sup>6</sup>*

- 2.1.18 However; what is not said that what the Borough should do if this then results in a shortfall of land to meet economic needs? We understand that here the Councils Employment Land Review identified a need for employment land/floorspace in excess of supply – even before consideration is given to releasing protected industrial land for housing.
- 2.1.19 In essence – if the Borough decides to use this flexibility to boost the supply of housing on active employment sites this may reduce (remove) the need to consider Green Belt for housing need to meet the London Plan housing targets. But may exacerbate the need to release land for economic needs. The use of active employment land to meet housing need may solve one problem but creates another.

## **2.2 Summary**

- 2.2.1 Enfield is one of the few Councils where a two tier plan making system remains. Here the London Plan has considered ‘need’ and supply and ultimately directed Borough targets – including 12,480 homes to Enfield up to 2029.
- 2.2.2 Post 2029 the GLA provides no Borough Need figure to consider and requires Boroughs to roll forward only their assessment of supply – based on the GLAs 2017 SHLAA.
- 2.2.3 This process, as set out in paragraph 4.1.11, results in a target around 500 dpa post 2029. This is significantly below the 1,246 dpa London Plan 10 year period. It is also below the c. 1,900 in the original plan and only a fraction of the most recent Standard Method number of Enfield.
- 2.2.4 The reason for this ‘cliff edge’ is simply that the GLA, in their 2017 SHLAA, could not identify large site supply for Enfield post 2029. Following the paragraph 4.1.11 method the Councils target post 2029 is almost all a product of the small sites element (table 4.2 of the London Plan).
- 2.2.5 More recent evidence from the Enfield SHLAA shows that the Borough may struggle to meet even this low, cliff edge, target. If this continues, and additional supply cannot be identified the SoS would appear to require a local review of the Green Belt. Or the use of occupied (active) employment sites – but this in turn may also justify a Green Belt review because, as with housing, Enfield struggles to meet its economic needs in full.

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<sup>6</sup> SoS justification 10<sup>th</sup> December 2020  
[https://www.london.gov.uk/sites/default/files/201210\\_sos\\_annex\\_b\\_further\\_directions.pdf](https://www.london.gov.uk/sites/default/files/201210_sos_annex_b_further_directions.pdf)

## 3 Other Considerations

### 3.1 Introduction

- 3.1.1 Above we have found that following the London Plan paragraph 4.1.11 method Enfield's future housing target may fall from 1,240 dpa to around 500 dpa. This is the strict reading of the paragraph and the London SHLAA.
- 3.1.2 The main reason this falls so much from 1,246 dpa, is simply because the GLA failed to identify supply in Enfield post 2029 (because there is very limited capacity). For most boroughs the SHLAA identified supply in phase 4 and 5 of the Plan – which allows most boroughs to maintain a post 2029 target at least similar to the London Plan. This is not the case in Enfield.
- 3.1.3 There is however reason, in our opinion, to treat this number (~500 dpa) with care when progressing the plan.
- 3.1.4 Firstly, no housing target should be applied as an absolute minimum – the London Plan and the Panel Inspectors both encourage the Borough to look for additional supply outside of that identified in the London SHLAA.
- 3.1.5 Secondly; while only recently adopted, the Mayor is required to review the plan and adopt a new version within 5 years. This means that the evidence base must commence very shortly. The Mayor has been directed to use the Standard Method to inform the next London Plan and will no longer be permitted to use OAN. It is even possible that a new London Plan may be out for consultation in some form whilst the Enfield Plan is being examined.
- 3.1.6 Thirdly; progressing a plan with a declining housing target – where housing delivery in Enfield falls by 2/3rds post 2029 runs directly against national housing policy in general and at least the spirit of the NPPF which is designed to facilitate a 'boost' in delivery.
- 3.1.7 We have suggested Enfield takes legal advice over how to apply 'strategic' constraints in its paragraph 4.1.11 assessment and when ultimately identifying its next target post 2029. This needs to consider the interplay between the London Plan concluding no greenbelt review would be supported in the London Plan period (up to 2040) and the Borough's duty to progress a minimum 15-year plan. In summary; if the Borough cannot 'flex' some of the London Plan policy constraints, particularly the Greenbelt but also MOL and industrial land policies, it will be impossible to avoid the London Plan 'cliff edge' discussed above.
- 3.1.8 An added complication is that were the Borough required to release Green Belt land to meet the minimum London Plan targets discussed above - should only sufficient land be released to meet only the London Plan target? Or should additional land be released to ensure the longevity of the new boundaries.
- 3.1.9 So pragmatically we set out two other possible groups of scenarios for testing as the plan progresses. These are set out to help future proof the evidence base because they are not constrained by the London Plan assessment, which in turn, was bound by the supply identified in the 2017 London SHLAA.
- 3.1.10 Firstly we discuss the scale of new housing supply needed to simply 'roll on' the 1,246 dpa target in the London Plan. Secondly we discuss the new Standard Method,

#### **A roll on London Plan target (1,246 dpa)**

- 3.1.11 It would appear sensible to test whether at least the London Plan rate of delivery can be projected forward.



- 3.1.12 So we suggest testing the Boroughs ability to roll forward the 1,246 target post 2029.
- 3.1.13 There is no evidence that 1,246 represents or reflects any assessment of need. As set out above it reflects supply as established in the 2017 SHLAA for the period upto 2029.
- 3.1.14 Its purpose as a scenario der is simply that it avoids the 'cliff edge' and, while not 'boosting' delivery, housing targets in Enfield are not seen to fall.

### 3.2 Standard Method

- 3.2.1 There is no London need number for Enfield in the London Plan. But MHCLG do publish the Standard Method 'need' figure for the Borough.
- 3.2.2 As of December 2020 – when the Method was last updated by MHCLG – the Government provided a 'data table' setting out the Method by district. This showed 4,397 dpa for Enfield<sup>7</sup>.
- 3.2.3 In January 2021, for the purposes of the Method, the 'current year' (used in Step 1 of the Method) rolled to 2021 which slightly reduces the calculation to 4,373 dpa.
- 3.2.4 The table below shows the two calculations. The first calculation (4,397) aligns with published MHCLG data table while the second (4,373) rolls this on to 2021.

**TABLE – Standard Method – Without London Plan 'cap'**

	2020-2030	2021-2031	
Step 1	23,267	<b>23,139</b>	(10 years Household Growth)
Step 2	32,574	<b>32,395</b>	(Affordability uplift - 40% cap)
Step 3	N/A	<b>N/A</b>	(London Plan Cap)
Step 4	43,975	<b>43,733</b>	(Urban Uplift - 35%)
Per annum	4,397	<b>4,373</b>	

- 3.2.5 These two numbers (4,397 and 4,373) are so high because the starting point for the Standard Method calculation, the 2014 based household projections, already exceed Enfield's London Plan number. Added to this the lack of affordability (Step 2) increases this by the maximum permitted (40%) and as a London Borough this is again increased by 35% as part of the new 'urban boost' added to the Method in December 2020.
- 3.2.6 In the table above the Step 3 cap is not applied because the London was not published until March 2021. Also; in any event MHCLG discourage the use of a plan 'cap'. As set out in the PPG the 'cap' does not reduce 'need' (the need is always uncapped) and if the cap is used then plans should be reviewed even quicker to reach the uncapped number. It is therefore important that a 'uncapped' figure is also considered alongside any capped number.
- 3.2.7 The table below updates the calculation with a London Plan cap applied at step 3. This cap limits the assessment (at step 3) to 40% above the current London Plan target.

**TABLE – Standard Method – With London Plan 'cap'**

<sup>7</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/944896/Indicative\\_Local\\_Housing\\_Need\\_Publication\\_Table\\_ods](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944896/Indicative_Local_Housing_Need_Publication_Table_ods)

2021-2031	
Step 1	<b>23,139</b> (10 years Household Growth)
Step 2	<b>32,395</b> (Affordability uplift - 40% cap)
Step 3	<b>17,444</b> (London Plan Cap - 40% above LP target - 12,460)
Step 4	<b>23,549</b> (Urban Uplift - 35%)
Per annum	<b>2,355</b>

3.2.8 Unfortunately, this number is not fixed – as noted above the ‘current year’ moves forward and each year the Step 1 starting number falls slightly. Also each year the affordability ratio is recast (Step 2) and this can also change the assessment slightly. However, the ‘cap’ can mask any changes to Stage 1 or 2 where they above the ‘capped’ number.

**Should Enfield consider the Standard Method (as part of the local plan review)**

3.2.9 As regards the application of the Method to Enfield it is debatable to what extent it is relevant to the Borough.

3.2.10 When the Standard Method was recently updated in late 2020 the Government updated the Planning Guidance. They also provided a formal response to the 2020 Standard Method Consultation.

3.2.11 The merits of the 2020 consultation are not material here – the Method is effectively now ‘as is’. But as regards the ‘old’ London Plan targets and the new Method MHCLG stated:

*“This new plan [London Plan], when adopted, will set London’s housing requirement for the next 5 years. The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed<sup>8</sup>”*

Further the PPG was updated to state:

*“... , it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.” ID: 2a-034-20201216*

3.2.12 This confirms that Government does not expect the Boroughs to look to apply the Standard Method. The Method must first be ‘translated’ via the Mayor and the next round of the London Plan before being applied. This will not happen until the Plan is reviewed.

3.2.13 This is echoed at paragraph 1.4.4 of the London Plan which says “Boroughs can rely on these targets [London Plan targets] when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures.”

**Pragmatically: Should Enfield consider the Standard Method?**

3.2.14 It is clear that the Method will need to be translated into targets by the Mayor. There is no suggestion in National Policy that Enfield should look to apply the Method as a target in the next Enfield Plan.

<sup>8</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>



- 3.2.15 But as published the Method is the best estimate of Enfield's housing need available. It represents the Boroughs share of the national housing target (300,000 new homes per annum) and the Boroughs share of the need the Mayor will shortly need to consider.
- 3.2.16 Also knowing the *direction of travel* for the Boroughs housing target implied by the Method may be important should the Borough need to review the Green Belt as part of this plan review. If a review of the Greenbelt is required national policy (NPPF 139) would suggest that it is not limited just to meeting short term needs. The Council would need a view as to the likely long term need for housing land in the Plan area.
- 3.2.17 Finally; in our experience it is common for Councils not to explore or examine possible development sites in the Green Belt. This means that they can be unprepared should the circumstance arise where additional land is needed. By suggesting the Council should test the Method does not mean that we are recommending the Council is required to meet the number of homes in the Method. Only that it would be helpful for the plan making process to understand if or how higher housing targets could be delivered in the Borough. Also understand why additional housing can only be delivered alongside major infrastructure etc.

### 3.3 Summary and Scenarios

- 3.3.1 Drawing on the above we have developed a number of scenarios for testing. Two London Plan scenarios and two Standard Method scenarios. For the Standard Method there is a variant depending on when the London Plan is reviewed.

#### London Plan scenarios

- 3.3.2 The first scenario (core scenario) follows the London Plan paragraph 4.1.11 method. Following the paragraph this is based on the London Plan SHLAA (2017) for the 'large site' component (table 10.1 of the SHLAA) with the Small Sites component taken from London Plan table 4.2.
- 3.3.3 This results in a total requirement, over the London Plan period of 18,249 dwellings. This falls slightly if 2039 is used as the end data (as proposed for the Enfield Plan - 17,315)
- 3.3.4 Post 2029 the 'per annum' target falls to around 500 dpa – because the GLA SHLAA has almost no 'large site' supply post 2029.
- 3.3.5 We also show a second London Plan scenario – where the London Plan target is rolled forwards. This avoids the 'cliff edge' and essentially assumes that the Borough can identify a new round of large sites – not identified in the GLAs SHLAA. As noted above this is illustrative only because it is not based on any need of supply assessment. For Enfield the London Plans supply is largely exhausted by 2029.
- 3.3.6 This scenario shows 27,414 homes over the London Plan period and 24,920 for the shorter Enfield Plan period.

#### Standard Method scenarios

- 3.3.7 It is important to remember that, at the moment there is one London Plan compliant number – the scenario that meets the 10 year targets and thereafter follows the approach set out at paragraph 4.1.11. (London Plan Core Scenario).
- 3.3.8 But this results in a sharp declining target post 2029 because the 2017 SHLAA has little or no large sites supply for Enfield post 2029. The paragraph 4.1.11 assessment would encourage the Council to boost its supply using local evidence to boost supply post 2029. .

- 3.3.9 For the purposes of this paper we take the Standard Method as a indication of the scale of housebuilding National Government would like Enfield to accommodate. But we fully recognise that ultimately it will be for the Mayor to undertake the translation of need into a requirement as part of the next London Plan review. Any Standard Method number can only give Enfield an indication of the direction of travel for the Boroughs housing targets and the size of the 'gap' between known supply and full housing need.
- 3.3.10 In the Standard Method scenarios we always assume that the London Plan targets will remain for the next 5 years. At that point the London Plan will have been reviewed and the Mayor should ideally be looking to accommodate the 'full' method (4,373 for Enfield) but more likely will apply the London Plan 'cap' (2,355 for Enfield). This results in a 'need' for 80,571 homes over the London Plan period (71,824 for the Enfield period) and a lower (capped) need of 46,262 (41,555) .
- 3.3.11 But; it is likely that the Enfield Plan will be adopted before the Mayor completes the review of the London Plan. In which case the Borough could look to apply the current London Plan targets until 2029 and then, departing from the London Plan paragraph 4.1.11 method, look to accommodate a higher Standard Method derived number in policy preference to the London Plan 'cliff'. In which case it would be sensible to consider only the London Plan capped number on the basis that the London Plan will be less than 5 years old at the time.
- 3.3.12 This generates a need of 40,720 (36,010) homes in Enfield for testing. This is still double the target generated following 4.1.11.
- 3.3.13 Of the three Standard Method scenarios we suspect this is the most sensible – it assumes the Enfield Plan is examined, found sound, and adopted before the London Plan is reviewed. As such the Enfield Plan is able to carry forward the London Plan target until 2029. But, as an alternative to the London Plan 'cliff edge', the simple 'London plan continued' scenario the Borough looks to boost delivery in 2029 and tests meeting its 'share' of the London Plan total.
- 3.3.14 Arguably the Borough should look to test the full, uncapped, number post 2029 on the basis that the PPG is clear that this cap is less than ideal (64,936 / 56,190).

### Conclusions

- 3.3.15 The London Plan promotes a target for the next Enfield Plan period of 17,315. But this means that post 2029 housing delivery in Enfield falls – the opposite of the National 'boost'.
- 3.3.16 So; the Council ought to consider alternatives – reflecting the fact the London Plan provides only minimum targets and when looking for sites the Borough should not constrain its self only to these minimum.
- 3.3.17 But it is difficult to generate alternatives for testing because the most obvious, continuing the London plan per annum target has no evidence base. It is not 'need' or 'supply' nor a target itself. It is simply a convenient number whereby housing delivery is not falling.
- 3.3.18 The second alternative is the Standard method. But the Standard Method should not be directly applied by Boroughs. As published it is a 'raw' need figure that has yet to be translated (by the next London Plan) into Borough targets.
- 3.3.19 However; taken as a 'need' figure, an estimate of Enfield's share of housing need in the next London Plan review and the Boroughs share of the national 300,000 dwelling target, it is sensible to test the Boroughs ability to deliver this higher target.
- 3.3.20 The Method is complicated by the London Plan caps and when the London Plan is reviewed. But the most likely scenario is that the Enfield Plan will be adopted in advance of the London Plan review and can apply the London Plan target until 2029.

- 3.3.21 Post 2029 the most likely alternative need number will be capped to the London Plan. This provides a need<sup>9</sup> roughly double the London Plan (4.1.11) method – 36,010 dwellings in the next Enfield Plan period. Were the Council to look to see how to meet the full Standard Method need figure it would be required to test 56,190 homes over the Enfield Plan period.
- 3.3.22 We have developed alternative scenarios where the London Plan is reviewed earlier and the Method needs to be considered post 2026. These generate even higher estimates with the highest over 71,000 homes in the Enfield plan period. These estimates are ‘valid’ in that they are based on the Standard Method and they are a view of how many homes may be needed post 2026. But they are unlikely to be applicable given the timing of the Enfield Plan.
- 3.3.23 In summary we suggest the Borough considers testing:
- A) The London Plan Target (4.1.11) – 17,315 dwellings (in the Enfield Plan period). This is a minimum and should additional local supply be identified this should be used to inform a higher target. It should always be the ‘core’ scenario even through housing delivery falls.
  - B) The London Plan Target ‘rolled’ on – 24,930 dwellings
  - C) London Plan until 2029 then Standard Method – 36,010 (with cap) up to 56,190 (without cap).
- 3.3.24 We have also developed scenarios where the London Plan is reviewed by 2026 and the London Plan moves to an alternative Standard Method number. But given the timing of the Enfield Plan we don’t think these will apply. But they remain useful scenarios to note because they illustrate the scale of housing need the Mayor will be considering when reviewing the London Plan. This review is likely to emerge alongside the Enfield Plan so GLA evidence relating to a Standard Method commencing in 2026 may emerge.

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<sup>9</sup> Strictly this a combination of London Plan Target and Standard Method Need. Here we simplify this to ‘need’ as opposed to the London Plan 100% Target approach.

## 4 The need for a Housing Needs Assessment

### 4.1.1 The NPPF sets out the context for the amount of housing to be planned for:

*60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

*61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*

### 4.1.2 The detail is then provided in three chapters of the PPG:

Chapter 2a Housing and economic needs assessment. This covers the overall housing requirement, including the need to adjust the amount planned for to help meet the need for affordable housing.

Chapter 67 Housing Needs of different groups. This covers the needs of those in the PRS, the needs for self and custom build, student housing, and repeats much of the affordable housing section included in Chapter 2a.

Chapter 63 Housing for older and disabled people. This considers the needs of these two groups.

### 4.1.3 The 2017 London SHMA predates the current guidance for undertaking a housing needs assessment. It does not contain the required outputs, based on up to date evidence. It is highly unlikely that a Local Plan hearing carried out in 2022 could successfully rely on a housing evidence that will then be at least 5 years old. An inspector would, quite reasonably, as if the data was sufficient for local plan making. This is likely to be particularly important when it comes to meeting the needs of particular groups.

### 4.1.4 As discussed elsewhere in this note, the London Plan number is a supply based number, the standard method is a needs based number, which, at least in part, is locally derived.

### 4.1.5 Historically London has carried out sub-regional housing research, which often provide further detail. Enfield is not part of the 2016 North East London SHMA (Barking and Dagenham, Havering, Newham, Redbridge, along with Waltham Forest) or the 2018 West London SHMA (Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow). Neither of these include Enfield, the Council's most recent local information is now six years old, being their 2015 SHMA update (DCA, 2015), again predating the PPG.

### 4.1.6 The Council needs to develop local policies to meet local need, this information is not available from other sources, so it is necessary to develop that part of the evidence base here.

Report Name  
Job Name



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Job Name

