

8 Homes for All

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INTRODUCTION

- 8.1 The ELP is committed to facilitating the delivery of new housing that meets the local community’s needs. One of the primary responsibilities of the Plan is determining the quantity, distribution and type of new homes to be provided. The Borough’s initial approach is to optimise the use of previously developed land, reducing the need for new land in non-urban areas. This involves redeveloping existing sites at higher densities in the suburban areas, changing the use of some employment sites, incorporating tall buildings in the placemaking areas, and developing other previously developed windfall sites.
- 8.2 The Council has determined that, in order to meet the housing demand in the Borough, there will be a need to control the amount of planned development and redevelopment on land currently designated as Green Belt. Strategic locations for this purpose are outlined in Policies SS1: Spatial Strategy and the rural placemaking Policies: PL10 and 11. Additionally, strategic Policies for housing (H1), employment sites (E1) and burial and cremation needs (BG12) have identified further sites.
- 8.3 To support housing growth for all, the Council will actively monitor the housing land supply to ensure that a five-year supply of deliverable sites is maintained as required by legislation. The Council will also regularly review and update the data related to housing land supply through the Authority Monitoring Report which is accessible at <https://new.enfield.gov.uk/services/planning/monitoring/>.

STRATEGIC POLICY

H1: HOUSING DEVELOPMENT SITES

1. The Local Plan will provide for at least 34,000 new dwellings in the Plan period 2019 to 2041.
2. The sites set out in **Table 8.1** are allocated for housing and where appropriate mixed uses development are defined on the Policies Map. The sites have been selected on the basis of a methodology⁴⁶ which prioritises the development of brownfield sites. **Policy SS1** sets out the Borough-wide spatial strategy proposed to accommodate planned growth more fully. Further information on site allocations is presented on the site proformas in **Appendix C**. The proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development.

Table 8.1: List of sites to be allocated for housing development

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Enfield Town (PL1)			
SA1.1	Palace Gardens Shopping Centre Enfield	Mixed use (housing and town centre uses)	329
SA1.2	Enfield Town Station and the Former Enfield Arms, Genotin Road	Mixed use (housing and town centre uses at ground floor)	180
SA1.3	Tesco Superstore, Southbury Road	Mixed use (housing and supermarket)	303
SA1.4	Enfield Civic Centre	Mixed use (housing and office uses)	114
SA1.5	St Anne's Catholic High School for Girls, Enfield	Housing	131
SA1.6	100 Church Street, Enfield	Housing	78
SA1.7	Oak House, 43 Baker Street,	Housing	47
Southbury (PL2)			
SA2.1	Colosseum Retail Park	Mixed use (housing and town centre uses)	1,587
SA2.3	Morrisons, Southbury Road	Mixed use (housing and supermarket)	646
SA2.4	Southbury Leisure Park	Mixed use (housing and town centre uses including the re-provision of leisure/recreation uses i.e. cinema)	605
SA2.5	Tesco store, Ponders End, 288 High Street, Enfield	Mixed use (housing and supermarket)	521
SA2.6	Sainsburys Crown Road	Mixed use (housing and supermarket)	434 with an additional 434 beyond the plan period

⁴⁶ Link to site selection methodology paper

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Edmonton Green (PL3)			
SA3.1	Edmonton Green Shopping Centre	Mixed use (housing and town centre uses)	1,423
SA3.2	Chiswick Road Estate (Osward and Newdales)	Housing	299
Angel Edmonton (PL4)			
SA4.1	Joyce Avenue and Snells Park Estate	Housing (with some supporting non-residential uses such as social infrastructure)	1,188
SA4.2	Upton Road and Raynham Road Estates	Housing (with some supporting non-residential uses such as social infrastructure)	134
SA4.3	Langhedge Lane Industrial Estate	Mixed use (housing and reprovision)	120
SA4.4	South-east corner of the North Middlesex University Hospital Trust, Sterling Way	Mixed use (housing and offices)	260
SA4.5	Public House 50-56 Fore Street London	Mixed use (housing and town centre uses at ground floor)	58
Meridian Water (PL5)			
SA5.1	Meridian Water Phase 1, Willoughby Way	Residential-led mixed use	977
SA5.2	Meridian Water Phase 2 (Orbital Business Park)	Residential-led mixed use	2,236
SA5.3	Former Ikea store	Residential-led mixed use	1,507
SA5.4	Tesco Extra, 1 Glover Drive;	Residential-led mixed use	819
SA5.5	Meridian 13 (Teardrop site)	Residential-led mixed use	TBC
SA5.6 ³⁹	Meridian East (Harbet Road)	Residential + light Industrial in new LSIS + intensified SIL area	815

³⁸ To be read in conjunction with Policy E1

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Southgate (PL6)			
SA6.1	Southgate Office Village 286 Chase Road.	Mixed use (housing and offices with a ground floor café)	200
SA6.3	Minchenden Car Park and Alan Pullinger Centre, 1 John Bradshaw Road, Southgate	Housing	48
New Southgate (PL7)			
SA7.1	Former Gasholder site between North Circular Road and Station Road	Mixed use (housing with ground floor commercial uses)	182
SA7.2	Aldi (formerly Homebase), Station Road, New Southgate	Mixed use	203
SA7.3	Ladderswood Estate	Housing with some supporting non-residential uses such as social infrastructure	107
SA7.4	Arnos Grove Station Car Park	Housing (with some non-residential uses i.e. café/retail)	162
SA7.5	Coppice Wood Lodge	Housing	45
Palmers Green (PL8)			
SA8.1	Morrisons, 19 Alderman's Hill	Mixed use (housing and supermarket)	130
SA8.2	Lodge Drive Car Park (including the Depot)	Housing	124
SA8.3	Corner of Green Lanes and the North Circular	Mixed use (housing with the re-provision of existing use)	129
SA8.4	Travis Perkins, Bridge Drive, Broomfield Lane	Mixed use (housing with re-provision of existing use)	84

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Chase Park (PL10)			
SA10.1	Chase Park South	Housing including older persons (with supporting non-residential uses such as social infrastructure) - large scale new settlement	Approximately 3,600 homes in total of which 2,550 within the plan period including 95 homes for older persons
SA10.2	Arnold House (66 Ridgeway) & Land to the rear of 66 The Ridgeway (west)		
SA10.3	Chase Park North East		
SA10.4	Chase Park North West		
Crews Hill (PL11)			
SA11.1	Crews Hill North West	Housing (with supporting non-residential uses such as social infrastructure) - large scale new settlement	Approximately 5,500 homes in total of which 3,350 within the plan period
SA11.2	Crews Hill South West		
SA11.3	Crews Hill; North East		
SA11.4	Crews Hill		
SA11.5	Crews Hill South		
SA11.6	Crews Hill East		
Other proposed site allocations outside of the place making areas (urban areas)			
URB.01	Land known as Brimsdown Sports Ground	Housing with supporting non-residential uses to support open space	225
URB.02	Cockfosters Station Car Park	Housing	351
URB.03	Former Chase Farm Hospital	Housing with some supporting non-residential uses such as social infrastructure)	344
URB.04	Blackhorse Tower	Housing	216
URB.05	New Avenue Estate	Housing with some supporting non-residential uses such as social infrastructure)	204
URB.06	Former Middlesex University, Trent Park	Housing with some supporting non-residential uses such as social infrastructure)	251

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
URB.07	Sainsburys Green Lanes	Mixed use (housing and supermarket)	368
URB.08	Hoe, Eastfield, Cherry and Bouvier Estates	Housing (infill)	240
URB.09	Exeter Road Estate	Housing with some supporting non-residential uses such as social infrastructure)	129
URB.10	Alma Estate	Housing with some supporting non-residential uses such as social infrastructure)	Estimated gross capacity of 1204 homes with 127 remaining (net) to be delivered
URB.11	The Former Royal Chace Hotel	Housing (including older persons)	64 C3 + 92 C2
URB.12	241 Green Street	Mixed use (housing and non-residential commercial use at ground floor)	92
URB.13	Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate,	Housing (infill)	199
URB.14	Four Hills Estate, Lavender Hill	Housing (infill)	99
URB.15	Kettering Road Estate	Housing (infill)	90
URB.16	188-200 Bowes Road	Housing	86
URB.17	Main Avenue Site	Housing (infill)	80
URB.18	Land at Ritz Parade	Mixed use	71
URB.19	Albany Leisure Centre and Car Park	Housing with some supporting non-residential uses and re-provision of leisure centre	85
URB.20	Cuckoo Hall Lane Estate	Housing (infill)	59
URB.21	Moorfields Health Centre	Housing with some supporting non-residential uses such as social infrastructure)	52

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
URB.22	Oakwood Station Car Park	Housing	52
URB.23	Stoneleigh Avenue Estate	Housing (infill)	42
URB.24	Fore Street Estate	Housing (infill)	39
URB.25	Peveny Avenue	Housing (infill)	36
URB.26	Fords Grove Car Park	Housing	29
URB.27	South Street	Housing (infill)	29
Other proposed site allocations outside of the place making areas (outside urban areas)			
RUR.01	Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road	Housing with some supporting non-residential uses such as social infrastructure	291
RUR.02	Land between Camlet Way and Crescent West, Hadley	Housing	160

EXPLANATION

Meeting housing targets

8.4 Enfield faces a number of substantial housing challenges which the plan aims to address. Like many other London boroughs, there is a significant need for housing of all types, especially affordable housing that aligns with the London Plan. This need has been exacerbated in recent years due to housing not keeping pace with housing targets, including the need for larger family homes set out in Enfield's Local Housing Needs Assessment 2020.

8.5 London's housing need was determined to be some 66,000 additional homes per year during the examination of the London Plan. However, while the London Plan 2021 sets out a requirement to 2029, there are complexities in planning for housing growth to the end Enfield's plan period in 2041 and beyond, as set out in Chapter 2. With no clear target from the Spatial Development Strategy and the requirement to plan for 15 years in national policy, Enfield has taken a capacity-based approach to set its housing target post 2029, in line with Paragraph 4.1.11 of the London Plan. The approach is set out in more detail in the Housing Topic Paper (2023) and is calculated through the estimation of deliverable, developable and potentially

developable supply by drawing on: 1) the 2017 London SHLAA (for large sites); 2) rolling forward the housing capacity assumptions applied in the London Plan for small sites; 3) taking into account additional capacity as a result of any committed transport infrastructure improvements; and 4) identifying further local capacity in addition to the first point. This will also ensure that the NPPF requirement to identify land for homes is satisfied⁴⁰. More detail is set out in the Housing Topic Paper.

8.6 Enfield faces significant constraints on its housing capacity, particularly in the urban areas and including from the intensification of the existing housing stock through conversions and extensions. These challenges are elaborated on in more detail in the Exceptional Circumstances Topic Paper (2023). The Council is concerned about the demographic and social implications of building smaller homes and risks associated with the delivery of brownfield sites in urban areas in the timescales specified in the ELP.

8.7 Allied to this is the pressing need for more affordable housing in Enfield for the most vulnerable residents, compounded by the presence of over 3,000 households living in long term temporary accommodation, and over

100 families living in hotels. In simple terms, Enfield Council need to be able to source around 50 homes per month to meet the needs of those households newly approaching the Council for emergency accommodation. To reduce the use of hotel accommodation the Council requires a minimum of 100 properties per month. The Council's current ability to source around 10 properties per month within an hour and a half travel of Enfield falls significantly short of these requirements. Given the mixed tenure cross subsidy model required to build affordable housing today, delivering a larger number of market homes than are currently built is critical to delivering a higher amount of affordable housing to enable families to be moved out of temporary accommodation in Enfield, particularly those in hotels and hostels without proper access to facilities for families.

8.8 Enfield faces significant housing challenges, and the plan addresses these head-on by providing high amounts of affordable housing, primarily through brownfield land in urban areas and reliable sources like windfall schemes on small sites under 0.25 hectares. However, post-2029, housing delivery is projected to decline significantly without the development of Green Belt sites proposed in the ELP. These Green Belt sites play a crucial role in meeting Enfield's housing needs, especially in delivering larger family-sized and affordable

³⁹ NPPF (2023), paragraph 68 provides that the Local Plan should identify specific deliverable sites for year 1-5 and specific deliverable developable sites for years 6-10 and where possible years 11-15.

homes. Additionally, they help mitigate the delivery timescale risks associated with the largest brownfield sites, which Enfield heavily relies on. Detailed analysis of site phasing is available in Chapter 5 of the Housing Topic Paper.

8.9 There is a strong commitment in Enfield to address the housing crisis by dramatically increasing the supply of homes over the next five to ten years and sustaining high delivery over the coming decades. This is expected to bring substantive changes to housing conditions for the Borough’s residents and can initiate a chain reaction that benefits residents across all income levels, particularly those in need of affordable housing.

8.10 While it is acknowledged that Enfield faces a number of significant housing challenges, ELP policies are designed to tackle them directly. These policies aim to deliver substantial amounts of affordable housing while providing a suitable mix of homes that align with local needs, as detailed in Chapter 7 of the Housing Topic Paper. The supply of land is considered alongside estimated needs to formulate the proposed spatial strategy, complemented by various strategic and non-strategic policies that guide sustainable housing development in the Borough.

8.11 Policies in the Plan aim to accommodate a significant increase in housing provision over the plan period. This includes ongoing efforts to identify emerging windfall sites and collaborations with other agencies, such as the Greater London Authority, to optimally utilise surplus land and facilities to meet housing needs. Furthermore, the plan involves working with Neighbourhood Plan groups to identify additional housing sites. The total housing supply for the Borough over the plan period is indicated in Table 8.2 and comprises homes from various sources in addition to the Site Allocations specified in Policy H1.

8.12 Informed by the spatial development strategy, the anticipated distribution of housing makes provision for approximately 34,710 new dwellings over the plan period up to 2041. A significant proportion of new dwellings needed to meet this target will be delivered by sites allocated for housing in the urban area and a number of Green Belt sites to accommodate new dwellings. This approach recognises the need to support the delivery of larger units and increasing the provision of affordable homes.

8.13 The Council expects a high proportion of developments in urban areas to be in the form of flatted developments and therefore rely on lower density greenfield developments to deliver more family housing.

8.14 As explained in chapter 2 of the plan, a phased/stepped housing trajectory is supported in certain circumstances both in the London Plan and the NPPG on Housing Supply and Delivery as set out in Figure 2.3 of the plan.

Table 8.2: Housing supply – sources of supply over the plan period up to 2041 (net number of homes)

CATEGORY	PLAN PERIOD 2019-2041	BEYOND PLAN PERIOD
Completions since 1 April 2019	2,148	
Allocations (as defined in Strategic Policy SP H1: Housing development sites and including a number of consented schemes)	27,374	3,449
Other deliverable sites identified in the Housing and Employment Land Availability Assessment (HELAA)	1,558	
Other developable sites identified in the Housing and Employment Land Availability Assessment (HELAA)	1,021	
Unidentified small windfall schemes	2,839	
Estimated lapses	-935	
Total	34,710⁽¹⁾	38,159

⁽¹⁾ This excludes current permissions/completions associated with allocations.

STRATEGIC POLICY

H2: AFFORDABLE HOUSING

1. The Council will actively work with Registered Providers to maximise the provision of affordable housing in the Borough and will aim to secure 50% of all new homes, based on habitable rooms, over the plan period as genuinely affordable.
2. Affordable housing requirements will be calculated based on proposed gross housing floorspace and will be applicable to new developments on sites that comprise ten or more new housing units or a combined proposed gross floorspace exceeding 1,000 square metres. The specific requirements are as follows:
 - a. for developments on industrial land that would result in a net loss of industrial floorspace, a minimum of 50% affordable housing is required;
 - b. On former Green Belt sites, including the proposed rural placemaking areas at Crews Hill and Chase Park, a minimum of 50% affordable housing is required;
 - c. For all other major housing developments, a minimum of 35% affordable housing is required;
 - d. on publicly owned land subject to suitable portfolio agreements aimed at achieving a minimum of 50% affordable across a mix of sites.
3. The provision of affordable housing should be provided in line with the guideline mix, consisting of 50% social/affordable rented housing and 50% intermediate housing. Some flexibility in the tenure mix may be considered, particularly in cases where developments propose more than 50% affordable housing, subject to viability assessments.
4. Proposals that involve the loss or demolition of existing affordable housing floorspace, including estate regeneration schemes, will be required to replace at least the same amount of affordable housing floorspace, with an emphasis on achieving an uplift in provision wherever possible. Estate regeneration schemes will be expected to reflect the existing mix of affordable and family housing while considering the particular needs of existing and future tenants, including specialist housing.
5. Development involving the provision of affordable housing will be required to:
 - a. achieve the same high-quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space. In cases where it is feasible, grant funding should be used to maximise the delivery of affordable housing; and
 - b. provide affordable housing on-site within residential and mixed-use schemes). In exceptional circumstances, off-site provision or contributions of broadly equivalent value will be considered acceptable. This may occur where it:
 - i. avoids an over-concentration of a single type of housing, both on and off-site, to promote mixed and balanced communities; and/or
 - ii. secures a greater proportion of affordable units overall; and/or
 - iii. offers the best way of delivering affordable homes, including a greater level of social-affordable rented family homes.
6. Residential proposals that meet or exceed the thresholds specified in Policy H5 of the London Plan 2021 will not be required to

provide viability evidence and will follow the Fast Track Route (FTR). Only those proposals that cannot meet the threshold levels and the 50% social/affordable rented homes and 50% intermediate local requirement, will be required to undertake the Viability Tested Route (VTR). They must submit viability information and will be subjected to review mechanisms outlined in Policy H5 of the London Plan.

7. To maximise affordable housing delivery, review mechanisms will be used over the lifetime of the development in line with relevant London Plan guidance. For schemes following the Viability Tested Route (VTR), the following provisions will apply:
 - a. An Early Stage Viability Review will be required if an agreed level of progress on implementation is not achieved within two years of the permission being granted or within a period agreed upon by the Borough.
 - b. A Mid Stage Viability review at an appropriate date agreed with the authority, particularly for the largest schemes building out over long periods with multiple phases.
 - c. Late Stage Viability Review will be triggered when 75 per cent of the units within a scheme are sold or let, or within a period or other trigger agreed upon by the Borough.

EXPLANATION

- 8.15 Enfield is currently faced with a shortage of social and affordable rented homes, leading to an increasing number of individuals with low incomes finding accommodation in the private rented sector. This lack of affordability and housing stability in the local private rental market has contributed to a growing homelessness problem and many people living in inadequate housing. Furthermore, the population of Enfield is on the rise, and more households have low incomes.
- 8.16 Concurrently, there has been a notable increase in private sector rents and the number of privately rented homes within the Borough. This has led to a rising number of individuals with low incomes living in precarious rental arrangements, often facing substandard housing conditions. Data from the Census 2021 indicates that 53.4% of people in Enfield, either own their homes, have a mortgage, or are in shared ownership, marking a decline from the 2011 figure of 58.8%. Moreover, the average sale price of homes in Enfield for 2022-23 stood at £560,997.
- 8.17 Whilst there is a record of housing delivery in Enfield not everyone is able to access housing that is affordable within their financial means. Affordability is a major concern for those on the

lowest earnings, especially first-time buyers. On average, house prices are over fourteen times the average salary in Enfield. Consequently, many lower paid and lower skilled positions are filled by people who cannot afford to live in the Borough, leading to increased commuting. This situation creates an environment where smaller, privately rented properties are often the only feasible option for residents faced with high costs and a shortage of affordable properties. In the private rented sector, the average households spend over 45% of their gross income on rent, this is a much higher percentage of their net disposable income than would be spent if they were owning or renting from a registered provider. This has led to Enfield having one of the highest percentages of adults claiming housing benefit in London, well above the national and the London averages. These cumulative issues have contributed to acute issues of overcrowding and homelessness in the Borough, as evidenced by the number of extensive households on the Council's Housing Register. At the time of writing, approximately 6,000 households are on the housing waiting list, representing approximately 5% of households in the Borough. In short, the gap between incomes and housing costs is rapidly widening, highlighting a significant local need for affordable housing.

⁴⁰ This is based on 2021 census data; Enfield has around 120,900 households

8.18 The Whole Plan Viability Assessment found significant disparities in viability across different geographical areas within the Borough. As a result, it indicated that an area-based approach to housing tenure may be justified. The Enfield Whole Plan Viability assessment (April 2021) found that greenfield land in higher value areas of the Borough is likely to support higher levels of affordable housing, potentially up to 50% and substantial levels of developer contributions of at least £50,000 per unit, in addition to the current rates of the Community Infrastructure Levy (CIL). These findings suggest affordable housing on greenfield land is more viable both in terms of quantity and as a proportion of the overall housing offering, compared to other parts of the Borough. In light of these findings, we have set a 50% affordable housing target for housing schemes involving development on Green Belt land, aiming to secure the much-needed family sized affordable homes in those areas.

8.19 The affordable housing policy in this plan is informed by the findings of both the Local Housing Needs Assessment (2020) and the Whole Plan Viability assessment findings.

Draft Policy H2 Affordable Housing Approach

8.20 The draft ELP aims to achieve a Borough wide target of 50% affordable from the overall target of 1,246 new homes per year. This equates to a goal of 623 affordable homes per year, a substantial increase compared to the 224 affordable homes set out in the Core Strategy of 2010. Draft Policy H2 plays a crucial role in determining affordable housing requirements based on the typology and location of development. It requires estate regeneration schemes, Council-owned sites, developments resulting in the loss of industrial floorspace, and housing developments in the Green Belt to provide a minimum of 50% affordable housing. For all other major developments, the policy sets a minimum requirement of 35% affordable housing. This approach is in line with the London Plan, and informed by the Council's Whole Plan Viability assessment. The draft Plan does not only increase the requirement for affordable housing but also ensure that the homes are built to deliver the community's aspirations.

8.21 The draft ELP follows the threshold approach to affordable housing and viability set out in the London Plan. The target of 50% affordable housing

represents a minimum target for all qualifying housing proposals. The guidance for determining affordable housing provisions is drawn from various sources, including Enfield Local Housing Needs Assessment, Enfield Intermediate Housing Policy, the London Plan, and the National Planning Policy Framework (NPPF). These documents collectively inform the Borough's position on affordable housing and help ensure that the housing needs of the local community are addressed effectively.

Tenure mix

8.22 According to the Enfield Local Housing Needs Assessment (LHNA) of 2020, there is an estimated requirement for 1,407 affordable homes a year to address both the need for affordable/social rented accommodation need (i.e. 711 homes) and affordable home ownership or intermediate rented accommodation (i.e. 696 homes). In light of this suggests, the policy approach suggests a balanced distribution of 50% social/affordable rent and 50% intermediate housing, in line with the London Plan. This means prioritising the following forms of genuinely affordable homes:

- Homes based on social rent levels, including London Social Rent and London Affordable Rent

⁴¹ <https://new.enfield.gov.uk/services/planning/evidence-base/>

⁴² The western and northern areas of the Borough (Chase, Cockfosters, Highlands, Grange, Palmer's Green, Southgate, Winchmore Hill)

⁴³ <https://governance.enfield.gov.uk/documents/s82460/Intermediate%20Housing%20Policy%20-%20FINAL.pdf>

- London Living Rent
- London Shared Ownership

8.23 The proposed development's tenure mix will be expected to reflect the preferred mix set out in policy H2, acknowledging that rigid application of these requirements may not be appropriate in every case. It is not considered sound or appropriate to prescribe specific forms of intermediate housing product to be introduced on individual development sites. Therefore, the policy approach retains a degree of flexibility. When applications do not meet the specified amount of affordable housing as set out in policy H2, proposals will undergo detailed viability assessments to demonstrate that achieving these targets cannot be viably achieved. The findings from the Whole Plan Viability assessment indicate that, based on current values, having a proportion of social rented housing exceeding 50% would not be viable in most parts of Enfield.

8.24 Other forms of affordable housing including community led housing as addressed in Policy DM H6, will also be encouraged, if they meet the definition of genuinely affordable in the London Housing Strategy meet the criteria for being genuinely affordable.

First Homes

8.25 First Homes are a specific type of discounted market sale housing and for planning purposes, they should be considered to meet the definition of 'affordable housing'.

8.26 These homes will need to be discounted by a minimum of 30% compared to their market value. They will be exclusively available to first time homebuyers whose household income in Greater London is below £90,000 and the purchase should involve at least a 50% mortgage on the First Home. The Council will be required to secure a minimum of 25% of all affordable housing units through developer contributions, ensuring that they are designated as First Homes in perpetuity. Our affordable housing policy requirements allow for the incorporation of the government's policy regarding First Homes to be taken on board when negotiating affordable housing.

8.27 In Enfield, it is anticipated that First Homes may not fully satisfy the criteria for affordable housing. The expenses associated with building First Homes, particularly considering the level of discount required, are unlikely to render schemes financially viable. Consequently, there is a preference for shared ownership housing where it is appropriate. This position aligns

with the Mayor of London's Housing Strategy (2017) and the relevant funding programme arrangements. If developers intend to provide First Homes, they will need to show that these homes are genuinely affordable for local residents and that they will provide to the same level as they would for other housing options, in line with the guidance provided in Planning Practice Guidance.



Terraced Housing, Blagdens Lane, Southgate by GML Architects.

DEVELOPMENT MANAGEMENT POLICY

H3: HOUSING MIX AND TYPE

1. The provision of new homes both in the market and affordable sectors should contribute to meeting the needs of current and projected households, having regard to the following:
 - a. the need to provide an appropriate mix of dwelling types and sizes, reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (2020) or any succeeding documents;
 - b. the character of the development in the context of the site and surrounding area, taking account of accessibility arrangements and amenity considerations such as child density;
 - c. the site's location and physical characteristics of the site, including any identified constraints on the preferred housing mix;
 - d. the overall viability of the development taking into account of abnormal costs and specific characteristics within certain sectors, such as build-to-let housing;
 - e. the potential to introduce flexibility in the mix of market units that could lead to the delivery of additional affordable housing;
 - f. the need to optimise housing delivery on sites through the provision of appropriately sized homes in line with the London Plan;
 - g. with the exception of intermediate housing units and specialist elderly accommodation, development should provide:
 - i. a minimum of 20% of units must consist of two bedrooms, and 30% must comprise homes that meet the London Plan definition of family housing⁴⁵
 - ii. for affordable housing schemes on publicly owned sites and areas released from the Green Belt, a minimum of 20% of units should be two bedrooms, while 40% should meet the London Plan definition of family housing.
2. All forms of self-contained living accommodation, including the conversion of single dwellings into flats will be required to and, where possible, exceed the internal and external space standards set out in the London Plan and the Nationally Described Space Standard.

Accessible, efficient and inclusive design

3. At least ten per cent of new dwellings should be built to the M4(3) wheelchair accessible dwelling standard in accordance with Building Regulations.
4. All new residential developments should be designed with a 'tenure-blind' approach, ensuring the equitable distribution of tenure types throughout the development to prevent concentrations or clear distinctions and offer choice to all residents
5. Development proposals should demonstrate the consideration of housing types and mix and demonstrate how dwellings have been designed to be adaptable.

⁴⁴ The London Plan 2021 defines Family housing as "A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms."

EXPLANATION

- 8.28 Policy H3 aims to provide guidance on the tenure mix of new housing developments, placing particular emphasis on the need for larger homes i.e. those with 3 bedrooms or more. This emphasis is informed by Enfield's Local Housing Needs Assessment (LHNA), which assesses the specific housing needs of the Borough, and the London Plan definition of Family Housing, which by virtue of its size layout and design is suitable for a family to leave in and generally consists of three or more bedrooms. The policy also allows for flexibility in cases of retirement, sheltered, or extra care housing developments, with deviations from the policy requiring evidence justifying different priorities within the development's local context.
- 8.29 The LHNA indicates a demand for larger homes, especially in the social and affordable rent sector, where there is a particular need for two and three bedroom homes. In the market sector, there is high demand for family-sized three and four-bedroom homes. The LHNA also categorises the priority of dwelling sizes for social-affordable rented properties, with two and three-bedroom units having high priority, one-bedroom units with medium priority, and four or more-bedroom units with low priority. There can be instances

where the size of homes being delivered (in terms of floor area) goes far above nationally described space standards. In these cases, consideration must be given towards site optimisation in line with the London Plan Policy H3.

- 8.30 For affordable ownership, the recommendation is to focus on one and two-bedroom housing units, as these cater to households without children. However, there is still some demand for family-sized intermediate housing.
- 8.31 The largest demand in the market sector is for three and four-bedroom homes, reflecting demographic changes in the Borough. While two-bedroom flats may suit some families, there is a strong need and demand for larger homes. Nevertheless, delivering the desired housing mix in Enfield, especially in lower-value areas where providing sufficient affordable housing in low-density schemes is challenging, remains a significant challenge. This is due to lower residential sales values in these areas, even when construction costs and land values remain relatively constant.
- 8.32 An examination of the southeastern part of the Borough showed that the prices of new-build three-bedroom flats were higher than existing houses in the region, creating pricing challenges. In

areas with residential densities exceeding 150 dwellings per hectare, achieving the desired housing mix presents design and viability challenges. Additionally, construction costs rise with increased building height and density, whereas sales values do not necessarily follow the same trend.

- 8.33 Consequently, it is expected that a lower proportion of three-bedroom homes will be included in new site allocations, falling below the LHNA target. Traditionally, the majority of new homes in Enfield have been one and two-bedroom properties. To address these challenges, there is a proposal to adjust the housing mix requirement for strategic Green Belt sites, allowing for a higher proportion of family-sized homes. Initial viability assessments suggest that these areas may be more economically viable for this type of development. However, this adjustment alone may not fully meet the LHNA target and may not align with the land use optimisation and mixed, balanced community requirements of the National Planning Policy Framework (NPPF) and the London Plan.
- 8.34 The proposed housing mix for Green Belt sites, specifically Crews Hill and Chase Park, places a greater emphasis on larger homes, with family housing typically comprising 3-bedroom homes comprising 47% of the mix and 4-bedroom homes representing 24%. Further details can be found in the Housing Topic Paper.

DEVELOPMENT MANAGEMENT POLICY

H4: SMALL SITES AND SMALLER HOUSING DEVELOPMENT

1. The Council will support the construction of well-designed new homes on appropriate small sites, including on vacant infill areas and backland plots, upward extensions of flats and redevelopment of non-residential buildings, in line with London Plan Policy H2. The objective is to seek to achieve the London Plan's target of 3,530 new homes (equivalent to 353 new homes per year until 2029) on sites of less than 0.25 hectares.
2. Housing development and intensification on small sites will be particularly supported in the following locations:
 - a. sites with good public transport accessibility (e.g. PTAL 3-6);
 - b. sites located within 800 metres of a tube, rail station, or the boundary of a major, district or town centre as defined on the Policies Map;
 - c. sites with good local infrastructure including local centres, local shopping parades, local schools and community facilities; and
 - d. places with planned infrastructure improvements that will significantly improve PTAL and walking / cycling accessibility over time.
3. New residential development on small sites must be carefully and creatively designed to avoid harm to amenity of surrounding properties and uses, especially in terms of outlook, privacy, and access to daylight and sunlight. Innovative design solutions should be used to optimise housing density, land use and the provision of family housing where appropriate. This may involve using housing typologies like the use of courtyard and mews housing, rooftop and terraced amenity spaces, shared spaces and facilities, provision of basement/undercroft parking and the redevelopment of vacant/underused spaces, such as single-storey garages, external service yards and incidental amenity space.
4. To facilitate the appropriate development of small sites for housing, including through the sensitive intensification of existing buildings and sites, the Council will prepare design and characterisation guidance as appropriate. Proposals will be expected to have regard to this planning guidance, where relevant and demonstrate how it has been used to inform the development through the design-led approach.
5. Where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Potential measures include the return of hard standing into green spaces, installing green and brown roofs and green walls, tree planting, creating biodiversity-friendly habitats for instance bird boxes, and sustainable landscaping. In exceptional circumstances, where on-site measures are not feasible due to site constraints, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use of legal agreements and/or planning contributions.

EXPLANATION

8.35 In line with the London Plan, small sites and small housing development will play an important role in the delivery of new homes and the enhancement of existing neighbourhoods. This policy is intended to promote the creation of well-designed housing developments on small sites, which can measure up to 0.25 hectares and potentially accommodate up to 25 homes. These sites includes a variety of housing types, including apartment buildings, backland and infill developments, as well as communal forms of living.

8.36 Development of small sites will be supported in areas with good access to public transport and close to existing local infrastructure and services offered within town centres. Efforts are being made to encourage small site intensification, especially within town centres, through various mechanisms such as land assembly powers, housing renewal schemes, site acquisition by housing companies, direct funding, and the designation of housing zones. Encouragement is provided for developers and landowners to collaborate, promoting the development of small sites through area-based design codes or master planning exercises, thereby maximising redevelopment and intensification

opportunities along the Borough's linear high street corridors and town centres. Applicants should also reference design guidance from the Mayor of London and relevant supplementary planning documents to inform the design and layout of small-scale housing developments in suburban and urban areas of the Borough.

8.37 The Housing and Economic Land Availability Assessment (HELAA) offers up-to-date information regarding small sites, measuring up to 0.25 hectares, available in the Borough. This includes sites with existing planning permissions, outline planning permissions, and sites without planning permission, all of which have the potential to accommodate up to 25 new dwellings.

8.38 This policy's objective is to promote high-quality housing developments that respect the Borough's character and cater to diverse needs. There are several opportunities and types of small sites that can support new housing development, including vacant and underused brownfield sites and redundant ancillary facilities such as garages or residential storage units. However, these sites are often constrained by factors like irregular plot shapes, site access challenges, or land-use designations. As such, the majority of small site development is anticipated

to occur in existing residential areas, where new homes can be thoughtfully integrated with other compatible uses. Various forms of housing development on small sites are possible, including new construction, infill and backland development, conversion (subdividing houses into flats), demolition and redevelopment, or extensions to existing buildings (such as upward, rear, and side extensions, and basement development).

8.39 The Borough's approach to housing development on small sites aims to facilitate gradual intensification within existing residential areas, particularly when these sites are located within 800 meters of a station or town centre. The growth and development in these areas should enhance the local character of Enfield's neighbourhoods, with a design-led approach that respects and enhances distinctive features.

8.40 The Enfield Character of Growth Study (2021) identifies areas primed for increased small housing development, taking into account factors such as existing urban fabric, historical evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. This study categorizes areas based on their sensitivity to change, emphasising local character. All small

housing development proposals are expected to consult this document as a foundation for understanding the scope for intensification in a given area and recognising key features of the local character.

8.42 The development of small sites plays a substantial role in the ELP's housing trajectory. The Council will oversee progress towards the small site housing target through the Authority Monitoring Report and evaluate this policy's effectiveness during the ELR review process. Monitoring will also yield information regarding the spatial distribution of new small site housing development, allowing for necessary interventions to ensure that areas with a concentration of such development receive appropriate support through community facilities and other strategic infrastructure via the Council's Infrastructure Delivery Plan.

8.41 This study should be used in conjunction with other design guidance to ensure that development is compatible with the site and its surroundings. The Council will create and provide a collection of guidance documents to assist with the implementation of this policy, including existing and future Conservation Area Appraisals and Management Plans. Additionally, the Council will develop a Borough-wide Design Guide / Design Code that will incorporate guidance on sensitively intensifying suburban neighbourhoods.



Perry Mead, Peter Barber Architects

DEVELOPMENT MANAGEMENT POLICY

H5: SUPPORTED AND SPECIALIST HOUSING

1. The Council will facilitate the provision of appropriate housing to meet the specialist and supported needs of vulnerable people in Enfield, with a focus on creating specialist housing for elderly people. The Council will achieve this by:
 - a. supporting development that allows people to live as independently as possible, while also meeting the identified local needs within the Borough, with a target audience being Enfield residents;
 - b. providing housing options at a range of costs to accommodate the different financial circumstances of residents, in line with evidenced local need. This includes allocating a proportion of affordable specialist housing units on-site or a contributing towards addressing the identified need for affordable specialist housing elsewhere in the Borough; and
 - c. requiring the provision of affordable housing within the category of sheltered and extra care accommodation falling within use class C3.
2. Supported and specialist housing development should:
 - a. contribute to the creation of a mixed, balanced, inclusive and sustainable neighbourhood;
 - b. be well integrated into the wider neighbourhood and protect the amenity of neighbouring residents, following the agent of change principle;
 - c. be delivered through partnership arrangements between the developer and an appropriate support service provider;
 - d. be suitable for the intended occupiers in terms of the standards of facilities, design of buildings, density, parking provision; internal space and amenity space;
 - e. provide the necessary level of supervision, management, care and support services;
 - f. have arrangements in place for appropriate long-term management of the housing; and
 - g. offer easy access to community facilities, and be conveniently located near public transport, workplaces, shops and services appropriate to the needs of the intended occupiers.
3. Other forms of specialist housing for older persons falling into use Class C2 but meeting the definition set out in the London Plan, will be expected to deliver the following requirements:
 - a. provide affordable housing in accordance with policy H2 Affordable housing, and
 - b. incorporate accessible housing features to accommodate the needs of a diverse range of occupants.
4. The loss of supported and specialist accommodation will be resisted, unless:
 - a. an adequate replacement housing option can be provided; or
 - b. it can be demonstrated that there is a surplus of specialist accommodation in the area; or
 - c. it can be demonstrated that the existing supported or specialist accommodation are unable to meet relevant industry standards for suitable accommodation in a cost-effective manner.
5. In cases where the loss of supported and specialist accommodation is acceptable in line with Part 4 above, proposals will be expected to secure the re-provision

of an equivalent amount of residential floorspace, including affordable housing, where appropriate.

6. Proposals for care home accommodation will be supported where they are well connected and designed to a high-quality standard, having regard to other policies in the plan. The agent of change principle will be applied to new specialist and supported accommodation, with due regard to existing land uses in the area. In addition, proposals must ensure that 100% of habitable rooms are wheelchair accessible.
7. Any development that results in the net loss of floorspace for care home accommodation will be assessed having regard to the requirements set out in Part 4.
8. To ensure inclusive and mixed neighbourhoods and communities, proposals must not result in a harmful overconcentration of supported and specialist accommodation within the locality. This includes instances where proposals are situated adjacent to existing provision or would create an imbalance with other residential uses in the vicinity.

EXPLANATION

- 8.43 The Council is committed to protecting and empowering the most vulnerable residents in the Borough. The ELP's foremost priority is to assist local residents in maintaining their residency in their own homes through additional support and necessary adaptations. This includes the provision of new homes offering a wide range of tenures, types and sizes of housing to meet the needs and demands of different people in the community. This effort includes the development of new housing tailored for elderly people and those with disabilities (as outlined in this policy DM H5), as well as the accommodations for the travelling community (as outlined in policy DM H10), students (as outlined in policy DM H9), and others in the community with specialist housing needs. The design and implementation of these new residential units will consider the specific need of the local population, aiming to provide a genuine choice of housing options and promote the creation of sustainable, balanced and mixed communities.

Supported and specialist housing need

- 8.44 The National Planning Policy Framework (NPPF) from 2023, in paragraph 61, highlights the importance of considering and accommodating the diverse

housing needs of various distinct household groups. These groups encompass a wide range of individuals, including those seeking affordable housing, families with children, elderly individuals, students, people with disabilities, service families, travellers, renters, and those looking to build their own homes.

- 8.45 As further explained in paragraph 017 of the Planning Practice Guidance (PPG), the housing needs of specific groups often extend beyond the overall housing need figure calculated using the standard method. This is because the needs of these groups are based on the entire population of an area, rather than just the projected new households used in the standard method. When formulating policies to address the requirements of these specific groups, strategic policy-making authorities must find ways to meet the needs of these individual groups while still adhering to the constraints imposed by the overall established need.

- 8.46 The Local Housing Needs Assessment (LHNA) of 2020 as identified housing needs within these demographic groups, with a focus on two groups with significant and potentially increasing needs: firstly, elderly individuals and secondly those requiring specialised accommodation.

8.47 The population of individuals aged 65 and above is projected to increase by approximately 50% from 2018 to 2036, according to both the Office for National Statistics (ONS) and Greater London Authority (GLA) population projections. The most significant proportional growth is expected in the age group of 85 and above, with a projected increase ranging from 70% to 80%, depending on the specific projection data considered. These trends align with findings in the Enfield Joint Strategic Needs Assessment.

8.48 According to the 2014-based household projections from the Ministry of Housing, Communities & Local Government (MHCLG), the number of households led by individuals aged 60 and above is expected to increase by 28,498, marking a growth of 67.0% from 2018 to 2036.

Types of supported and specialist housing

8.49 Currently, Enfield has approximately 3,556 specialised housing units designed for older individuals, comprising 1,345 units classified under residential care (C2 use class) and 2,211 units categorized as specialised accommodation for older persons (C3 use class). With the aging population, there is an anticipated rise in the

demand for specialized accommodation for older individuals. Projections using the 2016-based ONS and 2016-based GLA data suggest that the requirement for residential care (C2 use class) is projected to increase to a range of 737 to 755 units by 2036, while the need for specialized accommodation for older individuals (C3 use class) is expected to grow to a range of 1,212 to 1,242 units.

8.50 To determine the overall extent of disability and support needs in Enfield Borough, various data sources can be utilised. The analysis explores the potential requirement for specialized accommodations for different groups based on available data while identifying areas where understanding may be lacking.

8.51 According to the 2011 Census, an estimated 55,218 residents in Enfield reported being in fair or bad/very bad health, representing 17.8% of the population. This figure is slightly lower than the national average of 18.3% for all of England. The Census also revealed that around 21,262 residents (6.9%) reported significant limitations in their daily activities, a rate below the 8.3% for England as a whole.

8.52 Extrapolating national disability prevalence rates to Enfield suggests that the percentage of the population

with a disability is anticipated to rise from 18.9% of residents in 2018 to 20.9% by 2036. This increase is projected to amount to an additional 15,864 individuals over this period.

8.53 This evidence informs Policy H5 supporting a broader context for addressing the needs of older individuals, people with disabilities, and specific groups with unique requirements. A significant policy tool addressing the needs of these groups is the provision of more accessible and adaptable housing.

Agent of change principle⁴⁶

8.54 The provision of different types of specialist and supported housing to meet identified local demand, especially in new higher density developments, will require careful planning, design and the selection of suitable locations to ensure residents' needs are accounted for while ensuring they are seamlessly and integrated into the new development. In some cases, the Council may require that the developer assumes responsibility for the future costs of soundproofing or otherwise mitigating the impact on proposed development from existing surrounding development, with this requirement being secured through a legally binding agreement.

⁴⁶ London Plan sets out how new developments can mitigate impacts from existing noise and other nuisance generating activities or uses on the proposed new noise-sensitive development. This is referred to as the 'agent of change principle'.

DEVELOPMENT MANAGEMENT POLICY

H6: COMMUNITY-LED HOUSING

1. Proposals for community-led housing schemes will be supported where:
 - a. a local need for this type of provision is clearly established;
 - b. optimal use is made of the site, contributing to the delivery family and affordable housing in line with policy requirements, with a development density that is appropriate to the site, having regard to other policies in the plan;
 - c. provisions are made for affordable housing; and
 - d. the scheme is designed to a high standard, including sustainable design principles, integrates adequate amenity space, and makes a positive contribution to the local neighbourhood.

EXPLANATION

- 8.55 The National Planning Policy Framework (NPPF) reflects the government’s aim to promote self-build and custom housebuilding, making it a more mainstream housing option. Following the Self-Build and Custom Housebuilding Act 2015 and the subsequent Self-Build and Custom Housebuilding (Register) Regulations 2016, local authorities are required to maintain a register of individuals interested in acquiring serviced plots for self-build and custom build homes. Enfield currently manages a Local Self-build Register, which is open to both individuals and community groups seeking to construct their own homes. Presently, the register contains 225 individuals and 3 community groups interested in self/custom build projects. It is important to note that registration on this list does not require a local connection test or any associated fees.
- 8.56 Community led housing is a growing trend in London, driven by Community Groups with support from the Mayor of London (Community Led Housing Hub) and local initiatives such as Naked House in Enfield. Community-led housing can take several forms, including housing co-operatives, Community Land Trusts (CLTs), co-housing, and self/custom build housing. These approaches are not mutually

exclusive, and are often combined to address specific needs. This type of development demonstrates our commitment to addressing housing demand within the Borough, and we will continue to monitor our register in line with the relevant statutory requirements.

- 8.57 Community-led housing can provide a more affordable route to home ownership, promote more cohesive communities, and offer flexibility in accommodating specific housing needs, as shown by Older Woman’s Housing Cooperatives such as OWCH. In Enfield, there is clear demand for housing solutions that go beyond what the market or the Council can provide in terms of affordability and housing typology.
- 8.58 Community-led housing projects can be implemented in a number of ways, including:
- start-up led by community-based housing organisations responding to housing demand or specific housing needs, involving groups of people aiming to construct their own homes;
 - the extension of existing community-based housing organisations to offer housing alongside their current activities, for and on behalf of the community;
 - partnerships with developers, housing associations, and local authorities to

support community groups in realising their housing ambition. Local authorities and developers can also play a role in facilitating the formation of such groups.

8.59 This policy supports self-build and custom-build housing proposals where they respond positively to the locality and contribute to the Borough's spatial strategy. All proposals must be designed to a high-quality standard and make provision for an element of affordable housing where required by policy. Given Enfield's projected demand for conventional housing, it is imperative that all developments, including self-build and custom build housing, optimises the use of sites to provide family housing, including through densities that are appropriate to the site location.

8.60 The Council has a statutory duty to maintain a register for self-build and custom-build housing and have regard to this register in its planning, housing and related functions. This serves as part of the evidence base informing the ELP's preparation, indicating the demand for serviced plots for self-build and custom-build housing from eligible individuals or groups. The Local Housing Needs Assessment (LHNA) has also assessed the demand for this type of provision, suggesting that the council should encourage the provision

of self and custom-build plots through policy and major allocations identified in the ELP. The LHNA also recommends utilizing suitable council-owned land or other available land controlled by willing landowners or developers to provide serviced plots to meet the demand.

8.61 Self-build, custom build, and community-led housing units contribute to the overall housing supply and diversify housing options. As a result, they are considered within the scope of our housing policy.

8.62 Consequently, our draft affordable housing policy endorses the delivery of this type of housing as part of affordable housing provision, provided it adheres to the defined criteria for genuinely affordable housing outlined in the London Housing Strategy.

DEVELOPMENT MANAGEMENT POLICY

H7: BUILD TO RENT

1. Proposals involving standalone build-to-rent (BTR) developments or build-to-rent blocks under unified management and as defined in the London Plan and associated guidance within large mixed tenure schemes will be supported where they:
 - a. deliver high quality housing and a mix of dwelling sizes that meet identified local and strategic housing needs as set out in relevant evidence;
 - b. offer tenancy agreements over at least a three-year period;
 - c. provide on-site affordable housing, to be retained in perpetuity in the form of Discounted Market Rent, at rental levels that genuinely qualify as affordable rent level, as defined by the Mayor of London;
 - d. commit to retaining these homes for at least 15 years, under covenant, and to be secured through a Section 106 legal agreement. A claw-back mechanism will apply in accordance with London Plan policy;
 - e. establish a review mechanism to address scenarios where policy compliant levels of affordable housing may not be financially viable, or provide a minimum of 35% affordable housing measured by habitable room. In such cases, a viability assessment will not be required, subject to early stage review; and
 - f. provide a management plan that commits to high standards in the ongoing management of the property and its premises, secured through a section 106 agreement.

EXPLANATION

- 8.63 Inclusion of low-cost and London Living Rent homes within build-to-rent developments serves the purpose of aiding households with average incomes in their quest to save for a down payment to purchase their own homes. In Enfield, these schemes are obligated to maintain a covenant period of at least 15 years, ensuring their sustained contribution to addressing housing needs across all housing types in the Borough. A claw-back mechanism, in alignment with the London Plan policies and national build-to-rent guidelines, is enforced to safeguard the value of affordable housing provision, should such units within build-to-rent buildings be converted to a different tenure during the covenant period.
- 8.64 Build to rent represents a valuable addition, increasing the capacity of the housing sector to provide new homes. Conforming to the London Plan, Build to Rent (BtR) applications are required to adhere to specified levels of affordable housing provision.
- 8.65 Consistent with the London Plan guidelines, the Council will accept affordable housing provision in the form of Discounted Market Rent at genuinely affordable rental rates. Each Build to Rent application will be assessed based on the unique circumstances of the site to address local affordability needs. In general, the aim is for Discounted Market Rent levels not to exceed 70-80% of the market rent, with a preference for schemes catering to family households. This approach is detailed in the Council's Intermediate Rent Policy and can be integrated into planning policy.
- 8.66 The ELP is informed by up-to-date evidence, including viability assessments. The proposed affordable housing targets are formulated in response to the evidence from the LHNA while taking into consideration the overall quantity of affordable housing that various targets can potentially deliver.

DEVELOPMENT MANAGEMENT POLICY

H8: LARGE-SCALE PURPOSE BUILT SHARED HOUSING

1. The Council will support large-scale purpose built shared living development where the following criteria are met:
 - a. these developments are situated in areas well-connected to local services and employment by walking, cycling and public transport, and their design promotes non-car dependent lifestyles;
 - b. they are under single management;
 - c. all units are available for rental with minimum tenancy lengths of no less than three months;
 - d. communal facilities and services are provided, sufficient to meet the requirements of the intended number of residents and include the following requirements:
 - v convenient access to a communal kitchen;
 - vi access to outside communal amenity space such as roof terrace and/or garden;
 - vii internal communal amenity space such as dining rooms, lounges;
 - viii laundry and drying facilities;
 - ix the private units provide adequate functional living space and layout, but are designed as self-contained homes or capable of being used as self-contained homes;
 - x compliance with any relevant standards for this type of scheme set out in London Plan Guidance;
 - xi submission of a management plan along with the planning application; and
 - xii contribution of an upfront cash in-lieu payment towards conventional C3 affordable housing.
2. Developments are expected to provide a contribution in lieu of affordable housing in line with **Policy H2**.
3. All large-scale purpose-built shared living schemes will be subject to the viability tested route set out in the London Plan. However, developments which provide a contribution equal to 35 per cent of the units at 50 per cent discount of the market rent will not be subject to a late stage viability review.

EXPLANATION

- 8.67 Large-scale purpose-built shared living developments generally consist of at least 50 units. However, schemes which seek to provide residential accommodation which does not meet space standards which are below this threshold will be expected to meet the detailed standards for communal spaces and private rooms set out in the latest London Plan Guidance. This type of housing falls into the sui generis use class and serves as an alternative housing option for single-person households who either cannot or choose not to live in self-contained homes.
- 8.68 While large-scale purpose shared living accommodation does not fall within C3 use class, it is still considered a form of housing like student accommodation. The number of bedrooms in such developments would be counted towards our housing targets. However, as the units within these accommodations may not meet the minimum housing space standards, they are not deemed suitable for providing affordable housing on their own. Therefore, in accordance with the London Plan, the Council expects purpose-built shared living accommodations to make an upfront cash contribution in lieu of affordable housing, subject to a viability assessment.
- 8.69 To ensure the ongoing quality of the accommodation, communal facilities, and services, as well as its positive integration into the surrounding communities, a comprehensive management plan must be prepared and submitted with the planning application. The agreed-upon management plan will be secured through a Section 106 agreement.

DEVELOPMENT MANAGEMENT POLICY

H9: STUDENT ACCOMMODATION

1. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will be supported where they:
 - a. contribute to meeting an identified strategic need, giving priority to local need;
 - b. secure the occupation by specific educational institutions. In cases where this possible, providers should, subject to viability, include an element of student accommodation that is affordable for students in the context of average student incomes and rents similar to those offered by London universities⁴⁷.
2. All proposals for student accommodation must be situated in appropriate locations that:
 - a. are well-connected and have good levels of public transport accessibility (normally PTAL 4-6) and easily accessible by walking and cycling; and
 - b. are within or at the edge of town centres, or other locations that benefit from shops, services, leisure and community facilities appropriate to the student population.
3. All proposals involving the development, redevelopment and/or intensification of student accommodation must ensure a high standard of amenity for future occupiers and residents in the surrounding area. Proposals must meet all the following criteria
 - a. provide a high-quality living environment including factors such as unit size, daylight and sunlight standards and well-integrated communal areas and facilities that would not have a detrimental impact on the amenity and character of the local area;
 - b. allocate at least 10% of student rooms that are readily adaptable for occupation by wheelchair users from the outset, following relevant guidance and best practice;
 - c. provide adequate on-site cycle parking facilities;
 - d. demonstrate that the accommodation will be exclusively occupied by students;
 - e. protect the amenity of adjoining and neighbouring areas; and
 - f. include a site management and maintenance plan, demonstrating how the accommodation will be managed and maintained throughout its lifetime to ensure an acceptable level of amenity and access to facilities for its occupiers while not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood.
4. The loss of existing student accommodation will be resisted unless it is demonstrated that the facility no longer caters to current or future needs and the floorspace is replaced by an alternative form of residential accommodation that meets other housing requirements outlined in the Local Plan.

⁴⁶ In line with London Plan policy H17: Purpose built student accommodation

EXPLANATION

- 8.70 The higher education providers in London make a significant contribution to its economy and labour market. The Planning Practice Guidance (PPG) emphasises that local planning authorities need to plan for a sufficient supply of student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. The Local Housing Needs Assessment (LHNA) of 2020, recognised a relatively small population of student residents currently residing in the Borough, with only 221 residents currently living in such accommodation. Consequently, an assessment of their needs was not conducted.
- 8.71 This does not rule out the possibility of new student accommodation developments. However, it is essential that the siting of student accommodation provides residents with access to a wide range of services and facilities. During the site selection process, developers should prioritize locations near the educational institutions served by the development. When planning to meet the needs of students from outside the Borough, student accommodation should be appropriately located. The use of such developments should be in harmony with the amenity of neighbouring occupants
- and the character of the area. To prevent speculative development and ensure that proposals genuinely address identified needs, new student accommodation should be secured for the occupation of students from one or more specific higher education institutions..
- 8.72 A minimum of 35% of purpose-built student accommodation should be designated as “affordable student accommodation” to enable students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs to afford staying in student accommodation. The definition of affordable student accommodation, as outlined in the London Plan and supplementary guidance, will be applied. Affordable rent levels may undergo periodic reviews during the ELP’s lifetime, considering any significant changes to the government’s student maintenance loan regime.
- 8.73 New student accommodation must be of a high standard of design and construction standards, incorporating functional layouts and well-integrated living and communal spaces and facilities, while meeting the latest industry standards. Unit sizes and layouts should vary, taking into account the needs of different groups, such as wheelchair users, mature students with families, students seeking individual accommodations, and those using shared facilities. Whenever possible, the specific requirements of educational institutions should be accommodated..
- 8.74 While many students require accommodation during term time only, some use it as their permanent address. Therefore, student accommodation developments should allow for year-round occupation. To ensure viability, the Council will offer flexibility for temporary or ancillary uses during term breaks. Proposals will be assessed individually, and where acceptable in principle, the Council will use conditions or legal agreements to ensure that such temporary uses do not result in a material change of use of the building.
- 8.75 Student accommodation can bring benefits to Enfield’s neighborhoods and communities, supporting the local economy, complementing cultural industries, and stimulating inward investment. However, an over-concentration of student housing within a local area can negatively affect the amenity of existing residents and uses, undermining the goal of creating mixed and balanced communities. When the scale or concentration of student housing is likely to harm local amenity, the Council will either resist proposals or seek various mitigation measures to ensure the development is appropriate.

DEVELOPMENT MANAGEMENT POLICY

H10: TRAVELLER ACCOMMODATION

1. The Council will meet the identified need of at least 21 pitches over the plan period, for Traveller accommodation through the Traveller Local Plan.
2. Proposals for both transit and permanent provision including plots for Travelling Showpeople, will be required to demonstrate the following:

Location and connectivity

- a. the site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;
- b. the site provides convenient access to health care, retail and education school facilities with available capacity;

Impact on environment and heritage

- c. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

Occupational suitability

- d. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

Safe access

- e. the site can be safely accessed by pedestrians, caravans and other vehicles;

Integration with surrounding area

- f. the layout and boundary treatments of the development aim positively integrate with the adjacent townscape/communities; and

On site utility provision

- g. The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.

3. Due to the nature of this housing need, the Council will maintain continuing cooperation with neighbouring local planning authorities to identify the appropriate need and facilitate necessary provision.

EXPLANATION

8.76 Travellers are an integral part of the diverse community within the Borough, and their particular housing needs must be addressed. To proactively plan for and address these needs, a separate Traveller Local Plan is currently being prepared. This plan is informed by the Gypsy and Traveller's Accommodation Assessment (GTAA) 2020, which identifies a cultural need of 23 pitches (of which 21 align with the PPTS's⁴⁸ requirement of 21 pitches) over the plan period. The Traveller Local Plan Issues and Options consultation was consulted on between September – November 2023. Responses are currently being considered and the Traveller Local Plan will be updated accordingly. The next anticipated round of consultation is due to start in Spring 2024, which will explore the potential allocation of sites to meet the identified need and justify the preferred options going forward.

8.77 While the Traveller Local Plan is in preparation, it is crucial to provide policy guidelines to consider planning applications that may be submitted before the Traveller Local Plan is adopted. In line with best practices outlined in the PPTS, locally specific criteria should be used to guide both the allocation of sites in plans and formulating policies to assess planning applications which come forward on unallocated sites.

⁴⁷ Planning Policy for Traveller Sites - <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>