Enfield Local Plan

Housing Topic Paper

March 2024

www.enfield.gov.uk/enfieldlocalplan

ENFIELD Council

Background Topic Papers

A series of background topic papers have been prepared to support the proposed Submission Version Enfield Local Plan (Regulation-19). These are as follows:

- Spatial Strategy and Overall Approach Topic Paper
- Exceptional Circumstances Topic Paper
- Site Allocations Topic Paper
- Housing Topic Paper
- Employment Topic Paper
- Crews Hill Topic Paper
- Chase Park Topic Paper

These papers form part of the evidence base and are intended to make it easier to understand how the Council's emerging approach developed, including any conclusions reached at this stage.

Contents

1. Enfield Local Plan 2019 to 2041

Introduction

1.1 The London Borough of Enfield is preparing a new draft Enfield Local Plan covering the period from 2019-2041. This Plan sets out the council's vision for transforming Enfield into a place of growing opportunities for future generations, where the creation of new homes and jobs opportunities fosters the prosperity of all our communities to thrive. This Housing Topic Paper serves as a fundamental component of the evidence base underpinning the housing policies within the draft Enfield Local Plan 2019-2041 (draft ELP).

1.2 This topic paper relates to the following policies in the draft ELP:

- Policy SS1 Spatial growth and strategy
- Policy H1 Housing development sites
- Policy H2 Affordable housing
- Policy H3 Housing mix and type
- Policy H4 Small sites and small housing developments
- Policy H5 Supported and Specialist Housing
- Policy H6 Community-led Housing
- Policy H7 Build to Rent
- Policy H8 Large purpose-built shared housing
- Policy H9 Student Accommodation
- Policy H10 Gypsy and Traveller accommodation – a separate Traveller Local Plan

1.3 The purpose of this paper is to consolidate the findings from other key pieces of evidence that have informed the proposed approach in the draft housing policies, bringing together detailed information which does not fit naturally within the plan itself. It is important to note that this paper does not contain any policies, proposals, or site allocations, only background evidence to support the plan.

Background

1.4 The Council launched the Local Plan review with a preliminary consultation with local communities in 2015. During these early engagement exercises, various specific topic areas were explored. These includes the addressing the diverse local housing needs, such as affordable housing and specialist accommodation for older people, capitalising on opportunities in district centres and areas surrounding our transportation hubs for accommodating new homes, services and facilities, and recognising the need for areas outside of these areas to accommodate growth.

1.5 Additionally, the Council also consulted on an Issues and Options document (Regulation 18) during the late stages in 2018 and early 2019. This consultation focussed on the exploration of overarching issues and potential options but did not express the Council's preferred approach in terms of the scale of planned growth or the proposed spatial strategy.

1.6 Another round of consultation (Regulation 18) was undertaken in June 2021. This version represented an advancement of the 2018/2019 Issues and Options consultation. It identified a preferred level of growth and a spatial strategy accompanied by associated policies designed to accommodate this growth.

1.7 In December 2023 a near final version of the Local Plan was published for consideration by members in the lead up to full council approval to proceed with Regulation 19 in early 2024.

1.8 The Housing Topic Paper has been produced to provide justification for the housing policies within the Regulation 19 Draft Enfield Local Plan.

Evidence Base informing the draft Housing Policies

1.9 This Housing Topic Paper has been informed by the following evidence base documents[1]:

- Local Housing Need Assessment (2020);
- Stantec Paper- Enfield Local Plan Advice: Housing numbers in the emerging plan (2021 and Housing Narrative – set out in Appendix A);
- Housing and Economic Land Availability Assessment (2021 and 2023) including Methodology;
- Enfield Joint Strategic Needs Assessment;
- Integrated Impact Assessment;
- London Strategic Housing Market Assessment, 2017; and
- Enfield Strategic Housing Market Assessment (SHMA) (2015).

Document scope

1.10 This paper covers the following broad areas:

- Setting a housing requirement for Enfield to 2041;
- Housing need and target options;
- Housing land supply; for site selection see the Site Selection Topic Paper
- Housing trajectory and phasing;
- Affordable housing including housing mix, type and tenure; and
- Specialist Housing – including housing for specific groups.

Key housing issues in Enfield

1.11 Enfield faces a number of substantial housing challenges, which the Local Plan seeks to address with its policies and proposals. Similar to other London boroughs, there is a significant need for housing across all types, with a specific emphasis on affordable housing that complies with the London Plan's definition of family housing. In recent years, this need has been exacerbated due to a shortfall in housing development not keeping pace with established targets, including the need for larger family homes set out in the 2020 Local Housing Needs Assessment.

1.12 At the London Plan Examination in Public, London's housing need was established to be 66,000 dwellings per annum up to 2041. However, while the London Plan 2021 sets out housing requirements until 2029, there are complexities in planning for housing growth up to Enfield's plan period ending in 2041 and beyond, as set out in Chapter 2 (of this topic paper). With no clear target flowing from the Spatial Development Strategy and a national policy requirement to plan for 15 years, Enfield has taken a capacity-based approach to establish its housing requirement post 2029, aligning with Paragraph 4.1.11 of the London Plan.

1.13 Enfield faces significant constraints on its housing capacity, particularly within the urban areas, including constraints arising from the intensification of the existing

[1] https://www.enfield.gov.uk/services/planning/evidence-base

housing stock through conversions and extensions. These challenges are set out more comprehensively in the Exceptional Circumstances Topic Paper which demonstrates the case for releasing Green Belt. The council's leadership is concerned about the demographic and societal implications of building smaller homes which monitoring data shows are the predominant type delivered on urban sites. Moreover, there are potential risks in delivering brownfield sites in urban areas within the Local Plan's specified timeframes.

1.14 Adding to this complexity is the pressing need for additional affordable housing in Enfield for the most vulnerable residents, as set out in Chapter 6 (of this topic paper). Over 3,000 households are living in long term temporary accommodation, with more than 100 families living in hotels. Put simply, Enfield Council needs to secure around 50 homes per month to meet the needs of newly approaching households seeking for emergency accommodation from the council. Achieving a sustainable reduction in the reliance on hotel accommodation will require a minimum of 100 properties per month. Presently, the council can procure around 10 properties per month within a 90-minute travel radius of Enfield. Given the mixed tenure cross subsidy model required for building affordable housing today, it is imperative to build a larger number of market homes than are currently being built to facilitate the delivery of a higher amount of affordable housing, thereby enabling the relocation of families from temporary accommodation in Enfield, particularly those residing in hotels and hostels lacking proper family facilities.

1.15 Meeting Enfield's housing requirements within the London Plan up to 2029 presents a challenging prospect. Nevertheless, it becomes feasible when considering the use of brownfield land in urban areas, coupled with the incorporation of windfall schemes on small sites under 0.25 hectares as a reliable source of supply, as explained in Chapter 3 and in the Housing and Employment Land Availability Assessment. However, post 2029, the delivery of housing is projected to drop significantly without the delivery of Green Belt sites, now proposed for release in the Enfield Local Plan. These sites play a critical contribution to meeting the recognised housing needs of Enfield's residents, helping to boost the viability of supplying larger family sized homes and affordable homes compared to additional brownfield sites in urban areas. The release of these Green Belt sites is needed as relying solely on brownfield sites could pose a threat to crucial industries in Enfield and increase the risk of further delays in the delivery timeframe, particularly for the larger brownfield schemes. Further details regarding the phasing analysis of sites can be found in Chapter 5.

1.16 There is a strong political commitment in Enfield to address the housing crisis within the borough head on by significantly increasing housing supply in the next five to ten years and maintaining a high level of delivery in the following decades. This strategic approach aims to bring about a substantial transformation in the housing conditions of the borough's residents by providing additional new market and affordable housing. Evidence suggests that such an increase in housing supply2 can trigger a chain reaction within local areas, freeing up housing for residents across all income brackets, including those in need of affordable housing.

1.17 Enfield faces significant housing challenges. The policies in the Local Plan are intended to address these challenges by delivering high amounts of affordable housing, where possible, alongside an appropriate mix of homes that cater to local needs, as set out in Chapter 7. The supply of land has been assessed alongside estimates of need to formulate the proposed spatial strategy. A range of strategic and

[2] https://www.london.gov.uk/media/102314/download

non-strategic policies have also been developed to guide the development of homes in the borough, in a sustainable manner.

2. Enfield's Housing Need and Setting a Housing Requirement

Challenges in setting a housing requirement for Enfield

2.1 Determining the housing need and, consequently the housing requirement for the draft Enfield Local Plan is not a straightforward matter. Housing requirements set in the plan are meant to address technical estimates of local housing need, but they must also be set at a reasonable level, taking into account the need to accommodate other competing land uses in the borough and environmental constraints. This approach was recognised at the London Plan Examination In Public (EiP) when the Inspector's Panel accepted that, while London's housing need was established at 66,000 homes per annum up until 2041, it was sound for the London Plan to allocate sites to provide just 52,287 homes per annum and only until 2029.

2.2 This leaves a significant gap in the housing requirement for London when compared to need even for the period to 2029, amounting to 137,150 homes or 13,613 homes per year due to supply constraints. The Mayor of London is responsible for setting the housing requirements for London's local authorities and the London Plan sets out a spatial development strategy in respect of the development and use of land in Greater London. The adopted London Plan 2021 provides a requirement of 12,460 homes in Enfield from 2019/20 to 2028/29, equivalent to 1,246 homes per annum. However, Enfield's Local Plan covers the period from 2019/20 to account for the London Plan period 2019-2029, with a plan duration of 22 years extending to 2040/41 to account for national policy requirements.

2.3 The London Plan does not provide a clear answer to the 'critical issue' of how many homes Enfield needs to identify beyond 2029 since it only provides requirements for boroughs up to 2029. In contrast, national guidance requires plans to set a housing requirement for a 15-year period from the point of adoption. For Enfield, with a submission indicated in the latest Local Development Scheme (LDS) (May 2023) for early 2024, this could potentially extend to 2041. Consequently, the plan period extends to 2040/41 and the Council has had to adopt an approach to meeting a housing requirement that seeks to satisfy both these policies.

2.4 Beyond 2028/29, the London Plan does not specify borough housing requirements but recommends London boroughs follow a specific methodology as set out in the London Plan 2021 (paragraph 4.1.11) to determine their housing requirements beyond 2028/29, extending to 2040/41 in Enfield's Case. Based on this, Enfield must rely on local evidence of identified capacity, which will be discussed in detail below.

2.5 In preparing the draft Enfield Local Plan, the Council considered a range of approaches to determining a housing requirement. To support the delivery of new housing to meet local needs three housing requirement options and their associated benefits and dis-benefits were explored, as detailed in the following section. Through this analysis, a preferred approach to determining the housing requirement option has been identified, taking into account the need to balance national guidance and London Plan policy.

2.6 NPPF footnote 8 states that the Local Plan must identify specific deliverable sites in the plan period with an appropriate buffer. Due to Enfield's Housing Delivery Test 2021 result, this buffer is 20%. Therefore, the target for land supply in the first five years of the plan period (2022/23 to 2026/27) is calculated as 1.2 times the London Plan's target of 1,246, resulting in 1,495 homes. Should this requirement be met, as targets are cumulative, the London Plan target for the remaining years up to 2028/29, that is for the two years 2027/28 and 2027/28, would be adjusted lower, reducing the overall target to 12,460 homes up to 2028/29.

2.7 However, the London Plan established a housing requirement from 2019/20, creating a backlog in delivery for the three years 2019/20, 2020/21 and 2021/22, during which Enfield delivered only 2,148 homes cumulatively, falling short of the 3,738 homes required by the London Plan. National policies state that where possible the deficit accrued since the start of the plan period should be met within the first five years, following the Sedgefield Method. Given the step change in housing requirement compared to past delivery rates, the accumulated backlog is significant when combined with the buffer required in the first five years of the plan period.

2.8 The backlog of 1,590 homes is proposed to be addressed using a variant version of the Liverpool Method, ensuring that Enfield delivers against its London Plan targets up to 2028/29 while complying with the PPG. This entails large scale sites becoming available in 2027/28 to compensate for the shortfall in delivery during the first three years of the plan. Essentially, this approach aligns closely with the Sedgefield Method set out in the PPG, as the backlog is cleared within the first seven years of the plan rather than over the entire plan period to 2041/42.

2.9 While the plan includes numerous smaller sites that can be delivered early in the plan period, there are strategic sites with have longer lead-in times. For this reason, the housing trajectory distributes the backlog's resolution throughout the entire plan period, using the Liverpool Method. Due to the extended lead times and delivery beyond the entire plan period for several large sites, an end-loaded 'stepped trajectory' is proposed. Nonetheless, the trajectory demonstrates that the plan will fulfil the required 12,460 homes by 2028/29 in line with London Plan requirements, ensuring general conformity with that plan.

2.10 This section explores in detail the considerations made when determining the housing need figure and establishing the housing requirement for the draft Enfield Local Plan. Subsequent sections outline the range of housing requirement options considered and the justification for the preferred approach.

Identifying Enfield's Housing Need and Target

The Standard Method

2.11 Planning Practice Guidance[3] sets out a standardised approach for assessing overall housing need and provides guidance on assessing the requirements for affordable housing. This standardised approach provides the minimum housing requirement that should be included in local plans for boroughs. This standardised method must be based on the 2014-based national household projections as the starting point with subsequent adjustments then made to consider the housing affordability for local households. Under the current methodology, the figures are then capped to accommodate the existing requirements set out in adopted local plans.

2.12 The Standard Method underwent an update in December 2020, accompanied by updated Planning Guidance and an official response to the 2020 Standard Method Consultation by the government. In relation to the 'previous' London Plan targets and the new Method, the government stated:

[3] *https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments*

> *"The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed"*[4]

2.13 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."*[5] *(emphasis added)*

2.14 This confirms that Government does not anticipate the London Boroughs to implement the Standard Method directly. The Method needs to be initially 'translated' through the London Mayor and the subsequent iteration of the London Plan before it can be put into practice. This transition will only occur during the London Plan's review.

2.15 This perspective aligns with paragraph 1.4.4 of the London Plan which states:

> *"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."*

2.16 Consequently, the Standard Method should not be directly applied by London Boroughs. As published, it represents a 'raw' need figure that must be translated into borough targets by the forthcoming London Plan.

2.17 The Government made available a 'data table' setting out the Method's details by district, indicating a need of 4,397 homes per year for Enfield[6]. The tables below update this calculation using the latest data.

Table 1: Standard Method – without the London Plan 'cap'

Standard Method	**2021-2041**	
Step 1	46,278	20-year household growth
Step 2	18,511	Affordability Uplift (40% cap) Urban uplift not applicable in London until next London Plan is adopted
Total	**64,789 (3,239/annum)**	

2.18 The estimates of housing need are higher because of the starting point (Step 1) of the Standard Method calculation, which relies on the 2014 based household projections, exceeding Enfield's London Plan housing requirement. Added to this,

[4] *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*
[5] ID: 2a-034-20201216
[6] *https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944896/Indicative_Local_Housing_Need_Publication_Table_.ods*

the lack of affordability (Step 2) increases this further, as it includes the maximum permitted uplift of 40%.

2.19 Typically, the level of increase would normally be capped. However, as set out in the PPG, it is essential to note that this 'cap' does not reduce the actual 'need', the need is always an uncapped figure. If the cap is used, it would necessitate an even quicker plan review to move towards delivering the uncapped number. Therefore, it is important to consider both the capped and uncapped figures.

2.20 In Enfield, the relevant strategic policies for housing are those set by the London Plan. This is confirmed by the PPG, which states that *"for areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy"*. The table below provides an updated 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. It is worth noting that the urban uplift, as set out by the government, does not apply in London under the existing London Plan.

Table 2: Standard Method - with London Plan 'cap'

Standard Method	2021-2041	
Step 1	46,278	20-year household growth
Step 2	18,511	Affordability Uplift (40% cap). Urban uplift not applicable in London
Total	64,789 (3,239/annum)	
Capped Total	**38,368 (1,744/annum)**	Capped at 40% above existing figure (1,246 in London Plan).

2.21 Unfortunately, this number is subject to change. As previously noted, the 'current year' progresses annually, resulting in adjustments to Step 1. Additionally, the affordability ratio undergoes revisions each year at Step 2, potentially affecting the evaluation of the assessment. Nonetheless, the application of the 'cap' can obscure any modifications to Step 1 (population projections) or Step 2 (affordability uplift) when they exceed the designated 'capped' number figure.

The London Plan, 2021

2.22 The London Plan was published in March 2021. The Mayor of London holds the responsibility for calculating housing requirements for individual London boroughs to distribute housing need across London. The Mayor determined an Objectively Assessed Housing Need (OAHN) of 66,000 new homes[7] for London as a whole, and this need was addressed through London's Strategic Land Availability Assessment (SHLAA), in 2017. However, the revised Standard Method would lead to a huge jump in housing need across the capital to a minimum requirement of around 93,000 dwellings per annum. This is considerably higher than the 66,000 dwellings per

[7] This need is based on NPPF's now out of date guidance which required the assessment of need through the Strategic Housing Market Assessments (SHMA).

annum need figure recognised by Inspectors at the Examination in Public, let alone the 56,000 dwellings per annum supply figure due to constraints.

2.23 The current London Plan does not align with the OAHN as calculated by the Mayor at the time of the London Plan's preparation. This misalignment becomes even more apparent when considering the increased demand resulting from the revised Standard Method. The Secretary of State accepted this discrepancy, on the basis that the Mayor of London would have to work with willing partners to address the unmet need.

2.24 However, it is worth noting that the adopted London Plan relies on data and evidence, particularly the GLA's SHLAA, from 2017, which is now significantly out of date. Consequently, this evidence requires revision to underpin the draft Enfield Local Plan, which is not expected to be adopted until 2025 at the earliest.

2.25 The draft Enfield Local Plan covers the period from the base year of 2019/20 up to 2040/41, but housing requirements are provided only for the initial 10 years of the London Plan period.[8] The Mayor of London is responsible for setting the housing requirements for London's local authorities. The London Plan's housing requirement for Enfield is 1,246 homes per annum from 2018/19 to 2028/29. The London Plan does provide some limited guidance in relation to setting housing requirements beyond 2029, as noted in the supporting text of Paragraph 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."*

2.26 Paragraph 4.1.11 implies that Enfield can derive its housing requirements post 2029 by interrogating the 2017 SHLAA, supplemented with additional local evidence, while carrying forward the remaining (sound) element of the original SHLAA small sites adjustment.

2.27 Given that the adoption of the draft Local Plan is not expected before 2026 at the earliest, the Council is therefore required to identify housing requirements beyond 2028/29. The Council must also identify deliverable and developable land between 2022/23 and 2031/32 to meet this housing requirements. Moreover, it should identify specific, developable sites or broad locations for growth between 2031/32 and 2040/41. Therefore, the London Plan does not provide a clear answer to the 'critical issue' of how many homes Enfield needs to identify beyond 2029.

Housing Requirement Options considered at Regulation 18 Stage

2.28 In preparing the draft Enfield Local Plan, the Council has considered three housing requirement options, as alongside a 'do nothing' approach, which was ultimately not considered to be appropriate. These housing requirement options address the amount of development that could be accommodated in the borough and were

[8] The London Plan was originally submitted in 2017 with 1,876 new homes per annum as a draft target for Enfield (2019/29). In October 2019, the Inspectors presiding over the London Plan examination recommended a reduction in housing targets due to concerns Councils could not deliver the number of homes in the draft plan because the GLA's assessment of available supply was not.

identified through detailed analysis and engagement with various stakeholders. This included:

- Engaging in Duty to Cooperate discussions with the GLA to gain clarity on the methodology for establishing a housing requirement beyond 2029;
- Analysing the housing requirement-setting approaches taken by other London boroughs – particularly those currently undergoing examination or preparing a new Local Plans. This analysis aimed to understand the range of approaches used across London and their respective merits/disbenefits; and
- Seeking advice from external consultants, Stantec, regarding the most appropriate approach to determining a housing requirement for the borough. This approach considered the range of issues and complexities involved; and
- Seeking legal advice on the most appropriate and sound approach for setting a housing requirement for the draft ELP. This advice considered the broad range of issues and complexities identified.

2.29 Having sought a broad range of views through this research and engagement, the Council subsequently assessed the most appropriate approach to progress with based on this comprehensive solution.

Option 1: Reduced Baseline Housing Target

2.30 This option involves accommodating 17,000 new homes over the plan period, comprising the London Plan requirement of 1,246 homes per year up to 2029 and approximately 500 homes per year[9] from 2029 to 2039, equating to 17,460 homes in the plan period.

Pros:

- Compliant with London Plan Policy H1: Increasing housing supply and table 4.1: 10-year targets for net housing completions (2019/20 and 2028/29); and
- Compliant with Paragraph 4.1.11 for the period from 2029 to 2039.

Cons:

- Falls short of addressing Enfield's acute housing need, setting a target below the current housing delivery level and the historical 2016 London Plan targets for the borough in later plan periods; and
- Unable to secure a large provision of affordable housing, therefore failing to meet local needs.

Option 2: Medium Growth (Rolled Forward)

2.31 In this scenario, approximately 25,000 new homes are accommodated. The target comprises the London Plan requirement of 1,246 homes per year up to 2029, with the target rolled forward to 2039, equating to 24,920 in the plan period.

Pros:

[9] This figure is derived by applying paragraph 4.1.11 of the London Plan to establish a housing target for the borough beyond 2029 as set out in the previous section. This figure is based on the estimated capacity within the borough beyond 2029 as per the GLA's SHLAA 2017.

- Effectively addresses acute housing need in a sustainable manner and provides a much greater amount of housing over the plan period compared to the baseline option;
- Compliant with London Plan Housing Policy H1 and Enfield's housing requirement for Enfield until 2029;
- Maintains higher housing delivery across the plan period avoiding a drastic drop off in delivery post 2029; and
- Facilitates the provision of a substantial amount of affordable housing to meet local needs.

Cons:

- Not compliant with paragraph 4.1.11 of the London Plan; and
- Not all of the housing requirements can be accommodated in the urban areas.

Option 3: High Growth (using the Standard Method)

2.32 This option involves accommodating around 55,000 new homes. The target is based on adopting the London Plan target until 2029 and then using the government's Standard Method for need calculation as a housing requirement beyond this until the end of the draft ELP plan period.

Pros:

- Addresses the objectively assessed housing need figure derived from the government's most recent Standard Method.

Cons:

- Does not align with the London Plan;
- The Mayor of London and the government have explicitly discouraged boroughs from taking this approach, stating that the matter of distributing need the Mayor's responsibility; and
- Considered unsustainable on environmental and infrastructure grounds

Enfield's preferred Housing Requirement Option at Regulation 19 based on Paragraph 4.1.11 of the London Plan

2.33 The housing requirement figures to be incorporated into the Local Plan at Regulation 19 stage, the London Plan target will be used for the period 2019 to 2029 (i.e., 12,460 homes). A significant 'step' is proposed towards the end of this period, to ensure that the backlog from the earlier years of the Plan period is addressed. In the period from 2029 to 2041, it is proposed to set the housing target 5% below the estimated housing land supply figure for that duration (i.e., a target of 1,735 homes per annum). This approach allows for some flexibility to accommodate potential delays in delivery, while encouraging as much capacity as possible to come forward to help meet local housing needs, London's housing needs, and contributing to the government's overarching national objective to boost significantly the supply of housing.

2.34 It is important to be clear that because of Paragraph 4.1.11 of the London Plan and its silence on a housing requirement after 2029, the housing requirement figure after 2029 is merely sum of the allocations, in so far as they are judged to produce dwellings during the Plan period. Sites have not been allocated in order to provide a specific figure, or a specific buffer that has had been judged to be necessary by some form of assessment outside of the allocations. The precise headroom, though not the principle that there should be some, reflects the specific selection of sites, their relative deliverability, and there is no need to calculate a spuriously precise headroom figure, and then match it with sites. Sites do not present themselves or come forward in precisely matching dwelling numbers. The scale of the 5% headroom is required because the sites to be released are themselves large, and could face delays on that account.

2.35 Consequently, the overall housing target for the Local Plan period 2019 to 2041 would be 33,280 homes.

2.36 This figure is based on the calculation method set out in London Plan Paragraph 4.1.11. Breaking paragraph 4.1.11 into its constituent components, the determination of minimum housing requirements beyond 2029 should be based on the assessment of deliverable, developable and potentially developable supply through:

A) Drawing on the 2017 SHLAA findings, particularly for large sites;

B) Carrying forward the housing capacity assumptions applied in the London Plan for small sites;

C) Accounting for any additional capacity resulting from committed improvements in transport infrastructure; and

D) Identifying further local capacity in addition to the elements mentioned in A

A) Drawing on the 2017 SHLAA findings (for large sites)

2.37 Looking in more detail into ‘A’, it would seem to be a straightforward process, as the London Plan references the source to be applied. The London SHLAA, specifically Table 10.1, outlines the phasing of large site (>0.25 hectare) supply categorised by local planning authority, covering the London Plan period from 2017 to 2041. Phases four and five cover the 2029/30 to 2033/34 and 2034/5 to 2040/41 periods, respectively.

2.38 Phases four and five provide capacities of 761 and 814 homes for Enfield. This equates to **152** dwellings per annum (dph) for years 2029–2034 and **116** dpa for the seven year period ending March 2041, both of which should be considered in the calculation of post 2029 housing requirements according to paragraph 4.1.11.

2.39 However, these figures are based on strategic evidence that is now over 5 years old and has been superseded by more recent local SHLAA evidence.

2.40 There is a potential risk that by including this older data could result in either double counting local SHLAA evidence or that the capacity identified in the GLA’s SHLAA, of 2017 is no longer available.

2.41 Discussions with the Borough have indicated that, regardless of the instruction, it is no longer sound to rely on the GLA’s SHLAA as an accurate assessment of capacity. The GLA’s SHLAA, at best, is based on data that is over 5 years old (2017) and relies on older base data. Fundamentally, any supply identified by the GLA has now been superseded by more recent Borough data (D).

2.42 Adding to this and looking at other boroughs' approaches, the London Borough of Hounslow, when calculating their paragraph 4.1.11 target note that 'paragraph 5.22 of the SHLAA notes that initial notional capacities for all large sites (not including approvals) were calculated by the SHLAA system using default density estimates' and as 'the default density estimates provided in the GLA's SHLAA of 2017, are broadly based on the 2016 London Plan density matrix', 'it is considered that the methodology for allocating site capacity used during the preparation of the SHLAA may not remain appropriate following adoption of the London Plan 2021'.

2.43 In this respect, a more up to date position is required to ascertain capacity for delivery than what the 2017 London SHLAA provides.

B) Rolling forward the housing capacity assumptions applied in the London Plan for small sites

2.44 Regarding 'B' the GLA's initial small site allowances were originally found unsound by the London Plan Panel and were significantly reduced during the examination process.

2.45 For Enfield, Table 4.2 in the London Plan identifies 3,530 'small sites' homes or a 353 dpa small sites minimum target. This target is informed by the GLA's SHLAA (2017) and shows the potential capacity for additional housing on sites of less than 0.25 hectares in size. These targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply resulting from intensification in existing residential areas. Factors such as Public Transport Accessibility Level (PTAL), proximity to stations and town centres, and heritage constraints are considered.

2.46 Nevertheless, it is worth noting that our evidence indicates that even with this reduced figure of 353 dpa exceeds the actual delivery of small sites by the Borough to date. Local evidence suggests small sites have been coming forward at a rate of around 281 dpa, as opposed to the 353 dpa target outlined in the London Plan.

2.47 In line with paragraph 72 of the NPPF, any allowance for windfall sites should be well evidenced to provide robust future targets:

> *'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'.*

2.48 Incorporating the figure of 353 dpa into the evaluation in paragraph 4.1.11 assessment is clearly supported by the London Plan and the GLA in their Regulation 18 representations. The GLA emphasised that 353 is the minimum, and they encourage the Borough to aim for a higher number. Nevertheless, local evidence suggests a lower number of 254 dpa, as historical windfall delivery rates have fallen short of the GLA's anticipated levels.

2.49 The London Borough of Enfield has a track record of delivering 254 dpa from windfall small sites as monitored against the last 10 years (2012/13-2021/22). This raises questions about the robustness of the GLA small sites allowance set for Enfield. Nevertheless, the GLA's Regulation 18 representations stress that this element of the 4.1.11 assessment can be considered 'sound' on the basis that they were included in the London Plan (paragraph 4.2.3 of the London Plan). Consequently, this poses a matter for contemplation in the context of the emerging plan, as once adopted, the requirement is blind to its original components.

2.50 Therefore, if the small sites continue to lag behind the GLA's expectations, but the GLA's evidence is integrated into a future housing requirement through paragraph 4.1.11, the Borough would be required to try and 'make up' this deficit from a different portfolio of sites. This outcome is obviously not what was originally intended.

C) Taking into account additional capacity as a result of any committed transport infrastructure improvements

2.51 The anticipated impact of committed transport infrastructure improvements during Enfield's plan period should be taken into consideration when estimating new supply under paragraph 4.1.11. These transport schemes are most likely to increase development capacities during the second half of the plan period.

2.52 As of now, no transport schemes have been identified within the plan period to provide additional capacity that could be applied as part of a 4.1.11 assessment.

2.53 Instances where major transport improvements have facilitated development, such as the new Meridian Water station, are already accounted for in the GLA's SHLAA and local supply calculations.

D) Identifying further local capacity (in addition to A)

2.54 For this update, the significance of element D lies in the fact that in recent years, the Borough has been actively seeking a new portfolio of land and sites to meet housing needs. The most recent view of potential supply is set out in Enfield's HELAA, 2022, which is elaborated upon in more detail in Chapter 3 below.

The Paragraph 4.1.11 Calculation

2.55 Following Regulation 18 stage, the Borough has updated its local evidence of identified capacity. This updated evidence has been instrumental in establishing a housing requirement for the period beyond 2028/29, in line with paragraph 4.1.11 of the London Plan. Local evidence of capacity has been used to identify supply for this period, resulting in a calculated housing requirement of 21,900 over 12 years from 2029/30 to 2040/41.

2.56 However, there is limited policy or guidance either from the Mayor or nationally, that explicitly addresses how this relates to the concept of housing need. It is clear from the London Plan EIP and national policy that London has a very significant unmet need for housing.

2.57 The table below shows the relevant housing need figure along with an estimated number of net dwellings that form the Borough's land supply within the London Plan period up to 2029.

Table 3: London Plan period – housing requirement versus supply

Period	Backlog (Years 1-3)	Five-year supply (Years 4-8)	Deliverable and developable sit es (Years 9 and 10)	London Plan – plan period (Years 1-10)

Years covered	2019/20 to 2021/22	2022/23 to 2026/27	2026/27 to 2027/28	2019/20 to 2028/29
Nominal housing target calculation for period	1,246 x 3 = 3,738	1,246 x 5 = 6,230 +20% buffer = 7,460	1,246 x 2 = 2,492 + *2,211 shortfall = 4,703*	12,460
Methodology	London Plan 2021	London Plan 2021 and HDT	London Plan 2021	
Supply in the period	2,148	6,130	5,062	12,819
Shortfall over period	-1,590	-621 (3.75 years against 20% buffer requirement)	+2,570	+359
Explanation	Shortfall addressed using Liverpool method over whole plan period due to large site delivery/new settlement delivery	Shortfall addressed using stepped trajectory for years 1-5 to ensure 5-year land supply at adoption due to large site/new settlement delivery	Shortfall addressed through beginning of delivery of homes on large scale sites coming online in 2027/28	In conformity with London Plan

2.58 The supply position presented above should be considered as a preliminary estimate. It is based on assumptions made regarding the developable area, capacity, density and constraints of sites using the information available at the time of assessment. These assumptions were based on the data and technical studies submitted by developers and landowners, and the Council (as landowner). Any other pertinent information was also considered. The final figures for the number, type, and mix of dwellings will be determined through the planning application process. The table below sets out the supply position across the London Plan period and beyond, including the entire plan period.

Table 4: Enfield Local Plan period – housing requirement versus supply

Period	London Plan period (Years 1-10)	Post-2029 (Years 11-22)	Total Enfield Local Plan – period (Years 1-22)
Years covered	**2019/20 to 2028/29**	**2029/30 to 2040/41**	**2019/20 to 2040/41**
Housing target	12,460 minus 2,148 completions 2019-22 = 10,312	1,826 x 12 = 21,900 minus 5% to provide flexibility in the land market = 21,820	34,280 (equates to 1,558 per annum average)
Methodology	London Plan 2021	Paragraph 4.1.11	Stepped trajectory
Supply in the period	12,801 including 2,148 completions 2019-22	21,909	34,710
Shortfall over period	+634	+89	+723
Explanation	No shortfall – Enfield Local Plan in general conformity with the London Plan.		

2.59 The London Plan takes a unique approach compared to other plans. Instead of formulating future targets based on any assessment of 'need' it is deliberately designed as a supply side assessment. As a result, the number and the approach specified in paragraph 4.1.11 are entirely circular. This introduces a potential risk that, if the Council's assessment of the supply side is not robust, for example if key sites are delayed, the 'tilted balance' could be triggered through the absence of a 5-year land supply, as currently designed. The absence of a lack of a 5-year land supply could have significant practical implications for the Council in terms of policy implementation.

2.60 Clearly, it is not in the Council's best interest to promote unrealistic sites and timelines. Nevertheless, in this context if sites stall – the Council might find itself to 'make good' of these delays to ensure the maintenance of its land supply position.

Approach to Stepped Trajectory

2.61 Paragraph 21 of the PPG on Housing Supply and Delivery provides clarification on the circumstances in which a stepped housing requirement is appropriate for plan-making. It states:

> *'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period..'*

2.62 In Enfield, the sites which will deliver most of the housing, including the Placemaking Area sites and additional phases of Meridian Water which are not already under construction, are likely to contribute to housing supply later in the plan period.

2.63 Enfield is unique in London, due to its ambitions goals for establishing large scale new settlements both on brownfield and greenfield land. Consequently, there is a compelling argument for implementing a 'stepped' requirement. This approach ensures that the authority is not disadvantaged or subject to penalties when it comes to land supply and housing delivery test results. As such, a 'stepped trajectory' is required to reflect sites coming forward, considering that the borough has identified an adequate and realistic supply of small sites in line with London Plan Policy H2 and supported by local evidence. The specific details of the stepped trajectory requirement for housing need are set out below and explained in more detail in the chapter on Housing Land Supply.

Table 5: Proposed Stepped Trajectory

Period	2019/20-2021/22	2022/23-2026/27	2027/28-2028/29	2029/30-2040/41
Annual target	1,246	1,022	1,807	1,826
Explanation	Extant London Plan target (elapsed)	Reduced target to enable 5-year land supply with 20% buffer at Local Plan adoption	High annual target to ensure that London Plan targets are met for 2019-2029 (including backlog built up 2019-22)	Target derived from Paragraph 4.1.11 calculation set out above

Development proposed in the Enfield Local Plan – beyond 2041

2.64 The Enfield Local Plan also designates land for housing that is expected to be built out beyond 2041. This allocation takes into consideration both the practical phasing of large sites and the need to allocate this land for the creation of sustainable new communities through a critical mass. In accordance with the NPPF, it states that:

> *"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns" and that "The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset."*

2.65 Notably, some of these areas are located in the Green Belt. Therefore, the plan must establish permanent Green Belt boundaries that extend beyond the plan period, thereby releasing land during the plan period for potential development after 2041.

London's Housing Needs beyond 2041

2.66 It important to make a comparison between the projected supply in the plan, even beyond the plan period, and the acknowledged housing need figure for London. This figure of 66,000 dwellings per annum from 2019 to 2041 is established at the London Plan EIP. The table below provides an overview of the current estimate of housing need across London, including any backlog in delivery since 2019 and the full need until 2041.

Table 6: Housing need in London up to 2040/41

Component	Total across London	Enfield's 2.38% 'Fair Share'
London plan 2021 Housing Requirement 2019-2029	522,870	12,460
Supply need gap 2019-2029 @13,713/year	136,130	3,244
Post London Plan need - 2029-41 (12 years) @ 65,900/year	790,800	18,845
London Plan requirement 2019-2029 + fair share of London's housing need to 2029-2041	1,449,800	34,549

2.67 The table above clearly illustrates a substantial disparity in London's housing needs, approaching almost one million homes. This gap will persist until a new London Plan is introduced to identify additional capacity beyond 2029. If Enfield were to address 2.38% of this gap, calculated based on the borough's proportion of the overall London Plan target for 2019-2029 (12,460 out of 522,870), in addition to its existing London Plan requirement of 12,460, the total requirement would reach to 34,549 homes by 2041.

2.68 Nevertheless, the Enfield Local Plan, proposes a total of 35,710 homes by 2041. This Indicates that to meet all of London's housing needs until 2041, all boroughs would need to increase their housing delivery proportionately, mirroring the approach in the ELP. Furthermore, many boroughs have either adopted their plans that simply roll forward their respective London Plan targets beyond 2029, or, in some cases deliver fewer homes than their existing targets. This highlights the housing supply and need gap recognised by the Panel Inspectors, both within the London Plan period up to 2029 and in the years beyond from 2029 until 2041.

2.69 While housing needs and capacities do not simply operate on a proportional basis, it is noteworthy that Enfield's Local Plan does not offer any more housing supply significantly greater than it would do based on a proportionate share of London's overall unmet housing need in comparison to the current London Plan. Achieving this would require significant release of Green Belt land.

3. Housing Land Supply

Housing Completions

3.1 As evident from the housing completion data in the table below, the annual housing delivery in the borough[10] experiences significant fluctuations, primarily due to the phased implementation of large schemes. This pattern also demonstrates the challenges that the Council faces in delivering the number of homes needed to meet and exceed our housing requirements to address the housing crisis in the borough. In the past five-years alone, there has been a housing shortfall of 1,471 homes relative to our housing requirements.

Table 7: Housing Completions 2015/16 to 2019/20

Year	Completed (net)	Variance (against housing requirement)
2015/16	660	-99
2016/17	954	156
2017/18	389	-409
2018/19	496	-302
2019/20	429	-817
2020/21	878	-368
2021/22	841	-405

3.2 Since 2019, which serves as the base year for the new Enfield Local Plan and aligns with the London Plan 2021 for the period 2019-2029, a total of 2,148 homes completed in Enfield. This falls short of the London Plan requirement of 3 x 1,246 equating to 3,738 homes. Consequently, there is already a backlog of 1,590 homes that must be delivered before 2029. Trajectory estimates that this backlog will be cleared by 2029 based on the Liverpool method, which spreads the backlog over the remaining years specified in the London Plan.

London's Strategic Housing Land Availability Assessment, 2017

3.3 The Mayor of London does not provide specific housing requirements for individual boroughs beyond 2029, as the 2017 Strategic Housing Land Availability Assessment (SHLAA) focused exclusively on the period leading up to 2029. Nevertheless, it did provide indicative capacity figures for the post 2029 periods (i.e. Phases 4 & 5 of the SHLAA). However, in the case of Enfield, the SHLAA indicates limited amounts of housing supply during these later phases.

3.4 The table below is taken from the London SHLAA (table 10.1), shows the distribution of housing supply across the entire London Plan period. Phases 4 & 5 are post 2029

[10] This is fully set out within the Authorities Monitoring Report, available at: https://new.enfield.gov.uk/services/planning/monitoring/

and so can be used to estimate the post 2029 target. Phase 4 is five years long (April 2029/ March 2034) while phase 5 covers seven years (2034-2041).

Table 8: London's SHLAA, 2017 - supply by phase (large sites Table 10.1)[11]

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

3.5 This implies that there is only capacity for 761 homes from Enfield to be incorporated into the paragraph 4.1.11 assessment for the five year period following 2029. For the phase 5 period, 814 homes are available. This would provide 152 homes per annum for the five years from April 2029 to March 2034 and 116 new homes for the seven-year period ending March 2041.

3.6 In the absence of additional local evidence, the housing supply for Enfield post 2029 would fall from 12,460 homes until 2029 to 504 per annum thereafter or, 467 homes per annum post 2034. Accordingly, Enfield is compelled to rely on local evidence identifying available capacity.

Enfield's Strategic Housing Land Availability Assessment, 2020

3.7 Enfield undertook a Strategic Housing Land Availability Assessment (SHLAA) in 2020 to identify additional housing sites. Subsequently, the Housing and Employment Land Availability Assessment (HELAA) in March 2021 and 2023 were prepared to expand the assessment's scope by including employment land capacity alongside additional housing sites.

3.8 The SHLAA was instrumental in identifying the development potential of land that could be capable of delivering housing through an assessment of suitability, availability and achievability and indicating the likely timeframes for their development. At the time, Enfield's SHLAA identified the capacity for 13,813 new homes on urban sites that are both deliverable and developable. Additionally, it identified a capacity of 1,100 windfall dwellings[12] bringing the total SHLAA capacity to 14,913 dwellings over the plan period to 2039. It is worth noting that the SHLAA capacity figure has been adapted to reflect the changes in the government guidance which now requires a more stringent criteria when it comes to including housing sites as part of housing capacity study figures.

[11] Source: 2017 SHLAA.

[12] The average of this annual delivery of sites under 0.25 hectares is 281 dwellings per annum. A windfall allowance is not added for the first five years of the plan period in line with Planning Practice Guidance. In years 6-10 of the plan period there are already sufficient sites identified in the plan based on past trends, so the windfall allowance is 57 dwellings per annum in this period. In years 10-17 of the plan period no sites under 0.25 hectares have been identified. Therefore the full windfall allowance of 281 dwellings per annum is added.

Enfield's Housing and Economic Land Availability Assessment, 2021 and subsequently updated in 2023

Methodology

3.9 Enfield's Housing and Economic Land Availability Assessment (HELAA) prepared in March 2021 and subsequently in 2023 has followed the methodology set out in PPG. This guidance states that it should assess each site's suitability, availability and achievability (including the economic viability of a site). The HELAA further identifies the potential type and quantity of development that could be delivered on each site, offering reasonable estimates of build out rates.

3.10 Site capacities were estimated within for all suitable and potentially suitable sites within the HELAA, aiming to make the best use of land. As each site has its own characteristics and specific set of circumstances that may influence the net developable area and densities, a design typology case study approach, consistent with the London Plan Guidance, has been developed. Locally specific and appropriate design case studies were developed to account for specific Enfield considerations, and each suitable site was assigned the most appropriate design typology based on its individual context and characteristics. Intensification levels are expected to be greatest around transport hubs and in town centres.

3.11 These estimates have then been further refined with input from Enfield's Urban Design team, taking account of site constraints such as height sensitivities around heritage assets, tree preservation, flood risk, and other issues recorded in the HELAA. Adjustments to the net developable areas and overall scheme densities were made to accommodate these constraints, including the need to retain existing uses, such as replacing housing units. Excluding sites in greenfield areas, the average density across all allocated sites in the plan is approximately 75 gross dwellings per hectare, substantially higher than current densities. Greenfield sites are likely to be closer to 50 dwellings per hectare gross. On average, considering both types, this would yield around 66 dwellings per hectare.

3.12 Government estimates (Live Table 126) show Enfield's overall housing density was 15.77 dwellings per hectare in 2021. Even when dividing Enfield into Census Super Output Areas, the highest household densities do not exceed 66 households per hectare. While recognising the disparity between the two density methodologies, this still demonstrates that new sites a in the HELAA boast higher densities than most existing housing densities in Enfield. These developments are set to significantly enhance minimum densities in town and city centres and other locations served by public transportation access, while remaining within the range of existing neighbourhood density range.

Table 9: Density case studies applied in the HELAA

Case study project name	Case study Typology	Case study Subtype	Site size (Ha)	Dwellings	Net density (dwellings/ ha)	Max storeys	% Market	% Affordable
Horsted Park (Phase 1)	House	Semi-detached	4.1	154	38	3	75	25
House 4	House	Detached	0.022	1	46	2	100	
North Street	House	Semi-detached	0.16	14	88	2.5	0	100
Hidden House	House	Single-storey	0.0096	1	104	1	100	
Hedge Hill	Clustered Terrace	Mews	0.07	3	43	1	100	0
Essex Mews	Clustered Terrace	Mews	0.07	3	43	3	100	0
Ordnance Road	Linear Terrace	Townhouses	0.196	15	77	3		100
Perry Mead	Linear Terrace	Townhouses	0.089	4	45	3	100	
Marmalade Lane	Linear Terrace	Townhouses	0.87	42	48	3	95	5
Goldsmith Street	Linear Terrace	Townhouses	1.28	106	83	3		100
South Chase Lot 3	Linear Terrace	Dual Aspect Mews	0.44	29	66	3	65	35
Timekeepers Square	Linear Terrace	Townhouses	0.538	36	67	3	100	0
Ordnance Mews	Linear Terrace	Single Aspect Mews	0.026	3	115	3	0	100
Hammond Court	Linear block	Perimeter block no podium	0.35	43	123	5	49	51
Trafalagar Place	Linear block	Perimeter block with podium	1	235	235	10	75	25
Ryle Yard	Linear block	Perimeter block no podium	0.45	73	162	5	0	100
Buccleuh House	Linear block	Mansion block	0.59	107	181	6	36	64
Brentford Lock West (Block E and F)	Linear block	Courtyard block	0.9	157	174	7	60	40
Harvard Gardens	Linear block	Courtyard block	0.88	147	167	10	48	52
Sutherland Road	Linear block	Perimeter block no podium	0.43	59	137	5	0	100
The Echoes	Linear block	Courtyard block	0.39	53	136	6	0	100
Paxton House	Linear block	Mansion block	0.3	34	113	5	100	0
Park View Mansions, Chobham Manor	Linear block	Mansion block	0.43	88	205	6	100	0
Burridge Gardens (Phase 1)	Linear block	Courtyard block	0.66	153	232	6	48	52
Brentford Lock West (Block G)	Villa block	None	0.43	45	105	5	100	0
Finsbury Park Villas	Villa block	None	0.22	44.3	201	6	0	100

3.13 Design case studies become less meaningful over a certain site size. For these larger sites, we have turned to previous design or masterplan work, site promoter estimates (unless they are clearly not compliant with policy), London SHLAA-specified capacities, or exemplars based on existing or proposed development in a comparable context. On the largest sites, typically exceeding 10-15 hectares there is also a need factor in the additional land-take required for non-residential development including on-site infrastructure such as schools, employment and larger open space.

3.14 In the majority of cases, we assume 60-80% of the site can be used for housing, while the remainder is allocated for essential infrastructure, such as roads and utilities safeguarding buffers as well as social infrastructure such as open space and schools. Further iterative testing will take place through masterplanning exercises on those sites proposed for inclusion in the plan as strategic site allocations at the next stage of plan-making. Therefore, the potential capacity for these may therefore vary considerably to accommodate on-site infrastructure requirements in line with policy requirements. Comprehensive details on this approach are available in the Council's HELAA.

3.15 The Council has carried out extensive testing to scrutinise the potential opportunities and capacity for development within major brownfield opportunity areas. Additionally, our wider Character of Growth work involves evaluating development capacities within various areas. It has sought to do this by embracing a masterplanning-led approach which recognises the character and constraints of various locations within these areas, while establishing principles and criteria to optimise development in these locations.

3.16 Guidance is set out within Strategic Policy SP DE1 emphasising the delivery of a well-designed, high quality and resilient environment and Policy DM DE4 which addresses tall buildings.

3.17 The HELAA assessed 613 sites for housing or housing-led mixed use, categorising 316 as being deliverable, 100 as developable, 167 as potentially developable, and 30 sites as not developable. The analysis revealed a total supply of 17,236 deliverable and developable homes, and a further 1,540 dwellings on windfall sites, and a further 21,947 homes on sites that are considered potentially developable, subject to addressing a range of policy and other constraints.

3.18 Housing and Employment Land Availability Assessment (HELAA) of August 2023 builds upon and updates the SHLAA published in 2021. It is based on data from 1st April 2019, marking the start of the plan period, and extends to 31 March 2022. The HELAA served as the starting point for the site selection process for identifying suitable sites to allocate in the plan to meet the housing requirement.

3.19 The HELAA includes information collected in previous Call for Sites exercises from February 2019, March 2020 and February 2021, as well as the latest call for sites which took place from 15 June 2022 to 15 July 2022.

3.20 In addition to housing land identified in the SHLAA, the HELAA also assesses land available for employment as well as other uses drawing on previous and existing work on Employment Land Reviews. While the HELAA is an important source of evidence it alone does not, determine whether a site should be allocated for development or whether planning permission will be granted. The land included in the HELAA forms the "baseline" housing land supply.

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3.21 The HELAA identified sites from a range of sources as shown below in **Table 10**.

Table 10: Sources of potential sites

Source of data
Enfield Planning Applications – including extant approved applications, refused applications and those where construction has already commenced on site. This will also include schemes consented under permitted development rights.
The returns from Enfield's Call for Sites and Call for Small Sites (including additional consultation with relevant LBE stakeholders regarding Council estates with capacity for intensification and Council owned land either surplus or likely to become surplus over Enfield Local Plan period)
Public sector land, including that owned by GLA and TfL, either surplus or likely to become surplus over Enfield Local Plan period, in addition to that identified through the Call for Sites (identified through direct consultation with 'GLA family')
Sites with development briefs and/or developer masterplans
London SHLAA 2017
Existing Development Plan Allocations not yet completed
The GLA's London Development Database (LDD) and Planning London Datahub (PLD)
Enfield Brownfield Land Register
Sites identified through adopted or emerging Neighbourhood Plans in Enfield

3.22 Prior to undertaking the full assessment, a data cleanse process was undertaken. There were 1,015 sites that were discounted for a range of reasons including instances where sites overlapped with other submissions, were beneath the 0.05 hectares size threshold, had already been developed and therefore could no longer be considered available, or lacked sufficient information (e.g. a red line boundary identifying the site), among other factors.

3.23 These discounted sites were separate from the 620 sites that proceeded to the full assessment. These 620 sites are categorised as 'rejected sites' and were not taken forward to the subsequent stages of the assessment. The HELAA methodology was applied to evaluate a total of 620 potential sites for housing, as set out in the HELAA methodology. Some sites were promoted and assessed for different proposed land uses, such as employment, burial needs, community use.

3.24 The HELAA identified a total of 16,571 new homes from deliverable and developable urban sites. A further 1,540 homes are anticipated from unidentified small windfall sites[13]. The table below sets out the number of deliverable and developable housing units in each of these categories and places them in five-year time periods, up to 2035 and beyond.

3.25 Furthermore, the HELAA identifies 23,586 homes from ‘potentially developable’ sites. These potentially developable sites are sites which are subject to issues to be resolved with respect to availability, cannot currently be deemed suitable – primarily due to planning policy constraints, or those for which further evidence is required to demonstrate achievability.

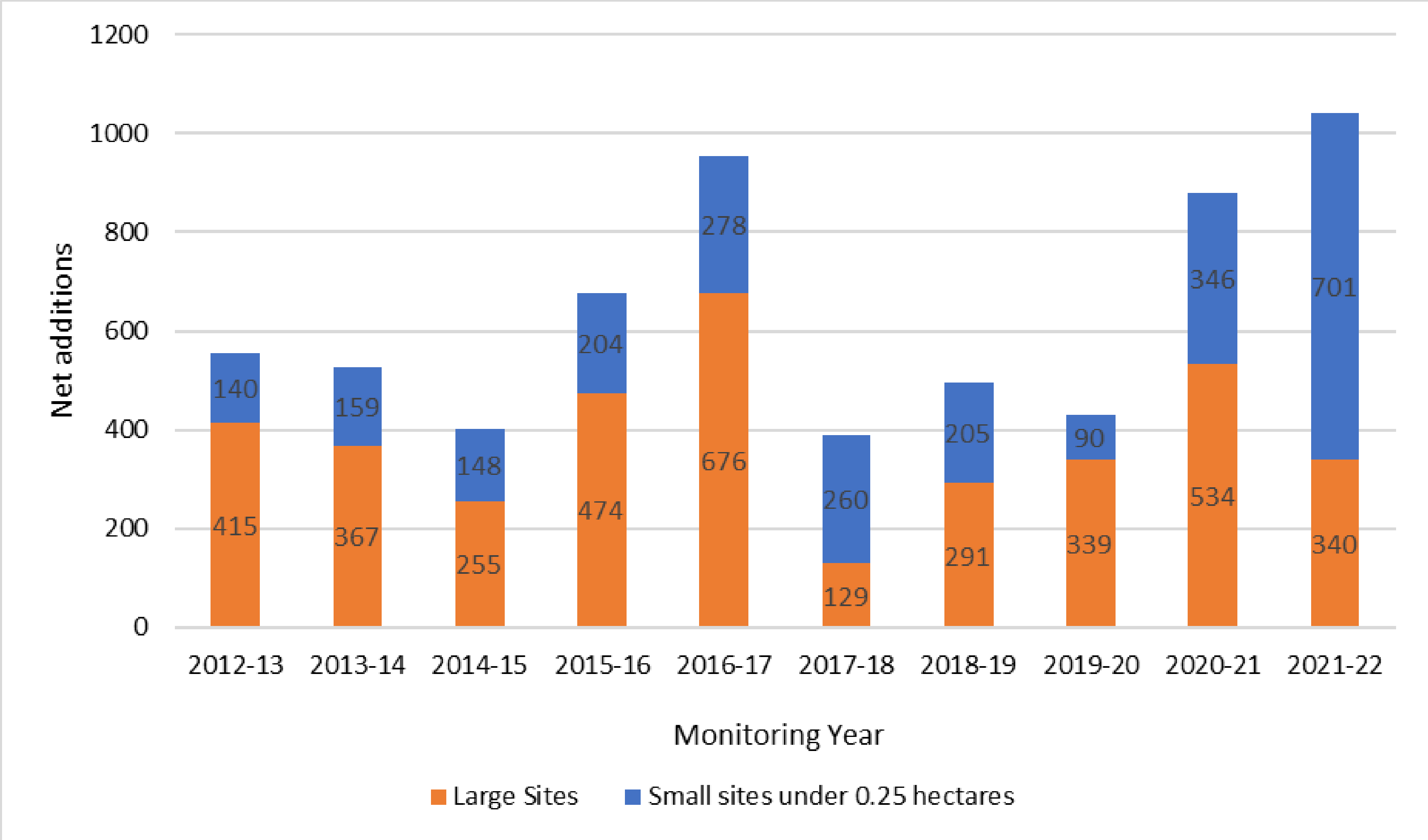
Windfall and Small Sites under 0.25 hectares

3.26 Historically in Enfield, a large proportion of development has come forward from small windfall sites that were not formerly allocated within Development Plan documents. This is recognised in the London Plan 2021 through the targets articulated in Policy H2 for the supply of housing from small sites. The HELAA and AECOM’s Urban Capacity Study in 2020 have documented the supply potential from small sites measuring less than 0.25 hectares.

3.27 The most up to date average past trend of annual deliveries from sites under 0.25 hectares, running from the period between 2012 to 2022, includes windfalls under the HELAA’s threshold of 5 dwellings. This data reveals an annual delivery rate of 281 dwellings per annum, making up around 48% of total delivery in the 10-year period, as shown in the figure below. The delivery trend has remained relatively consistent, although in recent years there has been a significant increase in delivery on small sites, particularly in 2021-22. However, this increase may be partially attributed to changes in monitoring methodology in that specific year with the introduction of the GLA’s Planning London Datahub. Additionally, the impact of the pandemic on monitoring processes and housing completions in 2019-20 and 2020-21 may have played a role.

[13] This is based on assumptions as set out in the GLA SHLAA (2017) and London Development Database completions data for Enfield over a ten year period (FY2009/10 – 2018/19), the borough has an average annual windfall delivery of 110 homes from smaller housing schemes delivering less than five net additional homes which represented 23% of all net additional housing completions during that period. Therefore 1,540 homes are estimated to come forward in the 14-year period between 2025/26-2038/39.

Figure 3.1: Delivery from small sites under 0.25 hectares from 2012 to 2022



3.28 According to the PPG[14], it states that in HELAAs:

> *"It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above".*

3.29 The most recent HELAA, in line with this guidance, includes planning permissions of all sizes, even down to single unit developments, including those that may have lapsed or are awaiting decisions. This comprehensive approach ensures a thorough review of deliverable urban capacity. To account for urban capacity in the later stages of the plan period, a small sites allowance has been introduced, aligned with the historic trend identified earlier. It is important to note that this allowance represents a realistic figure for supply based on past delivery trends and aligns with the PPG. There is no lapse rate for this figure as it is based on past delivery. However, if small sites did experience a lapse rate of 5%, it would necessitate additional approvals for small sites to account for a buffer.

3.30 Further evidence around a realistic small sites' windfall allowance is included in AECOM and Farrell's London Plan Small Sites' Evidence 2019, which explores three case study areas. This examination considered local infrastructure and the viability of intensification scenarios. It concluded that policy changes were unlikely to lead to a substantial increase in small sites delivery beyond the previously established historic trend of 250 dwellings per annum. Various market issues and pressures were identified as factors influencing this determination, providing further evidence against the full implementation of the London Plan Policy H2 Small Sites Target of 353 dwellings per annum throughout the entire plan period.

3.31 In terms of completions since 2019/20, the figure presented above shows there have already been a total of 1,137 completions in the three years up to 2022/23 in Enfield. This significant over delivery of small sites during the first three years of the plan period, attributable in part due to changes in monitoring processes, means that even with an allowance of 281 dwellings per annum (excluding identified small sites measuring under 0.25 hectares in the HELAA) for the remaining seven years until 2029, Enfield is still expected to achieve a delivery of 3,544 homes on sites under 0.25 hectares in alignment with the London Plan targets. This over delivery has been reported since 2019.

3.32 The windfall allowance in years 3-5 of the five year land supply, subtracts the land identified on small sites for 1,897 homes by the HELAA in this period to avoid double counting. This approach aligns with the methodology developed in the GLA's SHLAA 2017 and is consistent with Policy H2 of the London Plan. It is recognised that not all medium-sized sites can necessarily be identified through traditional site assessments, especially when they result from changes of use, the introduction of mansard roofs, or subdivisions of existing housing stock. The table below outlines the supply of small sites over the plan period, recognising that the early surge in small sites delivery is not considered sustainable over the long term.

Table 11: Small sites supply across Enfield's Local Plan period 2019 to 2041

Type	Completions	Deliverable (5-year	Developable	

[14] Paragraph: 009 Reference ID: 3-009-20190722

		housing land supply)		
Period	2019/20 to 2021/22	2022/23 to 2026/27	2027/28 to 2031/32	2032/33 to 2024/41
Sites identified in the HELAA	1,137	702	1,095	0
Windfall allowance (unidentified sites)	0	235 x 3 = 705	62 x 5 = 310	281 x 9 = 2,529
Average total per annum	379	281	281	281

3.33 Paragraph 72 of the NPPF, as well as associated Planning Practice Guidance also stipulate that the inclusion of 'windfall' assumptions in housing supply assessments in future years is permissible, provided there is 'compelling evidence' that such sites consistently become available and will remain a dependable source. These allowances must be realistic and take into account historical windfall rates and anticipated future trends.

3.34 In several London public examinations, it has been determined that to prevent double counting, sites under 0.25 hectares identified in the HELAA can be deducted from or balanced against the overall windfall allowance. During the third phase of the plan period, spanning from 2032/33 to 2040/41, no sites under 0.25 hectares have been identified. Consequently, the full windfall allowance of 281 dwellings per year is added. In total, the windfall allowance, when combined with the housing trajectory across all plan periods, amounts to 3,544, in addition to the 1,897 identified sites, resulting in a total delivery of 5,441 homes over 22 years. An issue with relying on windfall and small site supplies, particularly after 2029 when any delivery backlog would exacerbate housing needs, is the impact on housing type, tenure, and mix. Historically, small site delivery in Enfield has heavily depended on very small projects, many of which involve converting existing structures or changing their use from commercial purposes.

3.35 Data from DLUHC indicates that over the past decade until 2021/22, a substantial 28% of the net additional homes delivered in the borough were conversions or changes of use. There are three significant drawbacks to supply delivered in this manner in meeting local housing needs:

- Many small housing projects, especially those with fewer than 10 units, do not include affordable housing on-site and often, due to viability challenges, do not contribute commuted sums.

- A substantial number of small housing projects achieved through conversion and change of use result in smaller one and two-bedroom flats, leading to a decrease in larger housing options suitable for families, as detailed in Chapter 7.

- With a significant proportion of homes stemming from conversions within the existing larger housing stock, the overall amount of residential floorspace in the borough does not expand.

3.36 These issues primarily pertain to the type, size, and ownership of the homes being provided, rather than the total number of net additional homes, underscoring the need for a more comprehensive planning approach to address housing requirements in accordance with the Planning Practice Guidance.

Urban vs Rural sites

3.37 The assumptions used in the HELAA seek to make effective and efficient use of urban land, while also exploring opportunities for providing more family housing.

3.38 The HELAA also provides an updated assessment of the likely contribution of small sites to Enfield Borough's future housing supply. This assessment is based upon an analysis of historical local trends of evidence.

3.39 To arrive at an overall estimation of potential housing land supply from urban sites during the Plan period, the Council has used its Site Selection process and assumed phasing outlined in the HELAA. These figures are presented in Table 1 below, and they consider the delivery on small sites, as well as the possibility of some planning permissions to lapse.

Table 12: Local Plan Housing Supply (Urban Sites)

Source	2019-2029	2029-2041
Completions	2,148	0
Allocations	8,109	14,114
Other deliverable Sites	1,558	0
Other developable Sites	408	613
Windfall	829	2,715
Estimated Lapses	-452	-483
Total	**12,801**	**16,959**

3.40 Analysis of the housing deliverable through the urban sites shows that the housing mix is likely to remain heavily skewed toward smaller one and two-bedroom properties, with limited scope for providing more family housing (three-bedrooms or more). Additionally, the analysis also shows that the level of affordable housing that would be deliverable would fall a long way short of addressing the local need identified in the LHNA.

3.41 Recognising the Council's commitment to increasing the supply of more affordable and family housing, and in light of the government's aim of significantly boosting the supply of homes, the Council has explored the available options for increasing the delivery of such housing. The Council is also mindful of the timing challenges mentioned earlier. If the emerging Enfield Local Plan doesn't properly grapple with the housing issues now, there may not be another opportunity to address matters them in a future Local Plan review for many years, leading to a worsening gap between housing delivery and need.

3.42 Given the physical and viability constraints on many urban sites within Enfield Borough and the importance of protecting employment land to meet current and future need, while sustaining economic prosperity, the most realistic option for increasing the delivery of affordable and family housing is to consider sites within the Green Belt.

3.43 Two primary opportunities exists within the Green Belt have been identified at Crews Hill and Chase Park. Crews Hill has an existing under-utilised railway station and significant areas of previously developed land, offering an opportunity for creating a sustainable new settlement. Chase Park is in close proximity to existing public transport services and provides an opportunity for delivering a sustainable urban extension that can help address infrastructure deficiencies in the immediate surrounding area. Both areas are capable of boosting significantly the supply of homes to meet the Borough's needs, particularly in terms of family housing and affordable housing.

3.44 The implications of releasing land from the Green Belt for development have been carefully evaluated through an Integrated Impact Assessment (IIA)15. The Council believes that there are the necessary exceptional circumstances to justify the release of the required land from the Green Belt to accommodate the planned development at Crews Hill and Chase Park.

3.45 Presented in the table below is the overall housing supply within the Local Plan, including both the urban sites and proposed Green Belt sites.

Table 13: Local Plan Housing Supply (Urban and Green Belt sites)

Source	2019-2029	2029-2041
Completions	2,148	0
Allocations	8,309	19,065
Other deliverable Sites	1,558	0
Other developable Sites	408	613
Windfall	829	2,715

[15] Will be available around 25-November.

Estimated Lapses	-452	-483
Total	**12,801**	**21,910**

4. Housing Trajectory and Phasing

4.1 The draft Enfield Local Plan aims to accommodate a significant increase in housing provision over the plan period. This includes continued work to identify emerging windfall sites and working with other agencies such as the Greater London Authority (GLA) to ensure that the optimum use of surplus land and facilities is made to accommodate housing need and cooperating with Neighbourhood Plan groups to identify further sites for housing. The overall housing supply for the Borough throughout the plan period is outlined in the table below and will encompass residences sourced from various channels, in addition to the site allocations specified in the Local Plan. This will include other viable and developable sites identified in the Housing and Economic Land Availability Assessment (HELAA) as well as unanticipated small windfall projects.

Table 14: Housing supply – sources of supply up to 2041 (net number of homes)

	Plan period 2019-2041	**Beyond plan period**
Category	**Amount**	
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**	**38,159**

4.2 The table shows the number of homes identified to help the borough in meeting its housing need and targets. As previously explained, a stepped trajectory is required to account for the lead in times and delivery required for large scale sites and the delivery of new settlements in the placemaking areas, such as Meridian Water.

4.3 In certain circumstances, a stepped housing trajectory is endorsed in the London Plan and the PPG on Housing Supply and Delivery. The following paragraphs set out the rationale behind this approach.

Table 15: Potential HELAA site capacity in 5-year periods

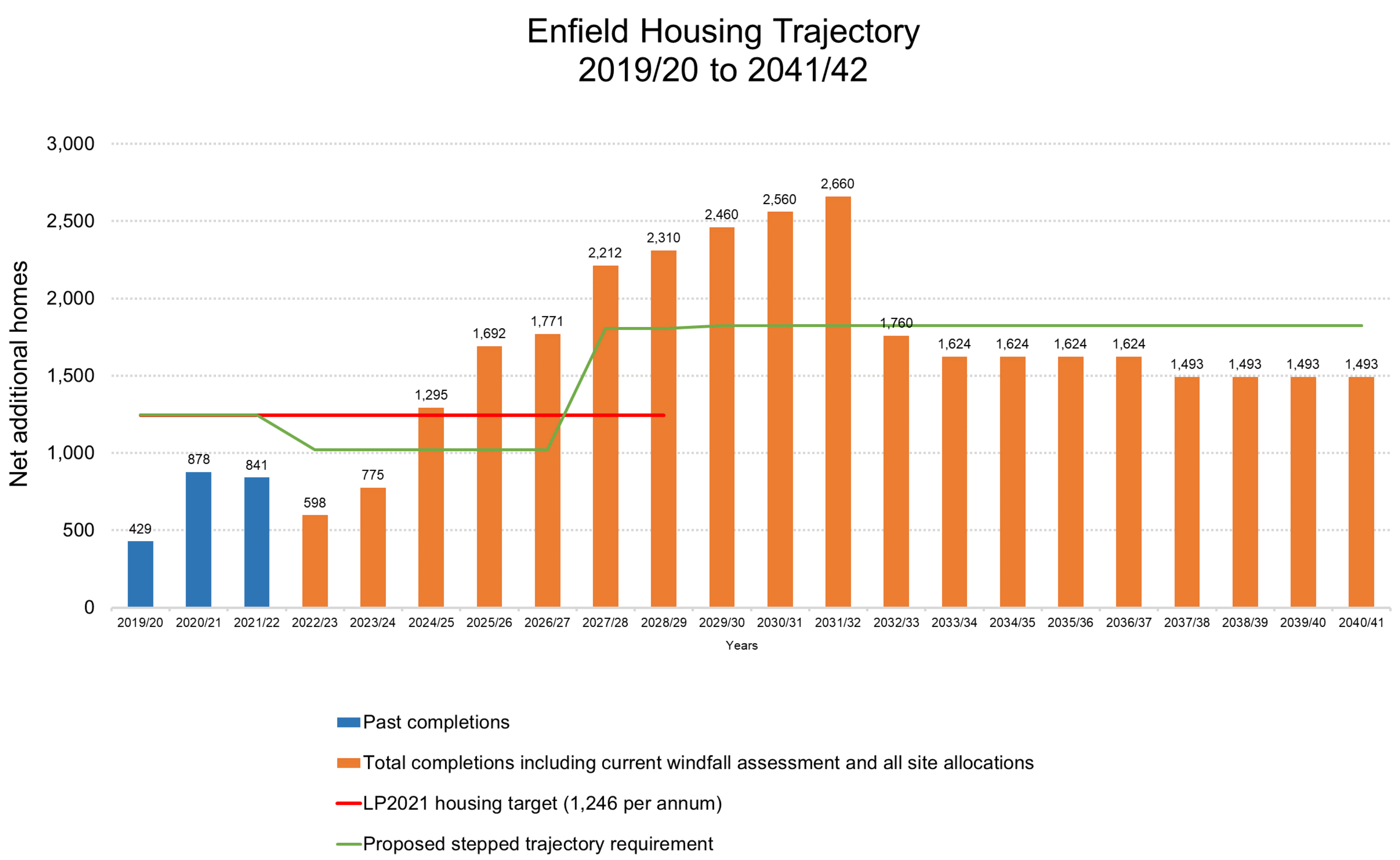
HELAA category	Completions 2019-2022	Total additions 2022/23-2026/27	Total additions 2027/28 - 2031/32	Total additions 2032/33-2040/41	Total additions Local Plan Period
Allocated Sites	0	4,153	11,228	11,993	27,374
Other Deliverable Sites	0	1,558	0	0	1,558
Other Developable Sites	0	0	1,021	0	1,021
Current windfall allowance	0	705	310	2,529	3,544
Lapses	0	-286	-415	-234	-935
Total	2,148	6,130	12,144	14,288	34,710

4.4 The housing land supply and associated trajectory is constantly evolving with new sites gaining permission, existing sites being completed and potential land becomes available. Consequently, the HELAA will undergo periodic reviews to capture changes that have occurred since the publication of this report.

4.5 The Housing Trajectory shown below shows the number of homes identified through the HELAA process to achieve our preferred housing requirement of 42,841 homes by 2041 and beyond, which includes the five-year housing land supply. It also provides information on the number of housing completions between 2015/16 and 2019/20. It is important to note that the housing trajectory presented is for illustrative purposes only. We expect the annual delivery of homes to fluctuate and we expect delivery to increase as we start implementing planning polices once they are applied to housing proposals.

4.6 Due to this ongoing change and significant increase in our housing requirement, we expect to use a stepped housing trajectory to meet the overall housing requirement over the plan period. This housing trajectory will undergo refinement, taking on board feedback from the Regulation 18 draft ELP consultation and further work in preparing the Regulation 19 draft plan.

Figure 4.1: Housing Trajectory



Phasing Methodology

4.7 The housing trajectory has been created using data from HELAA 2023, which includes thorough assessments of availability based on information from developers and other intelligence gathered by the council. The council conducts regular quarterly Developer Forum meetings with the development sector to gauge market sentiment and monitor the progress of key sites.

4.8 **Deliverable site phasing:** The HELAA evaluated sites using a risk-based approach, taking into consideration site-specific factors in line with the guidelines in the London SHLAA 2017, PPG, and NPPF. All sites categorised as "Deliverable" in the HELAA, thus contributing to the five-year housing land supply, have been granted planning permission. Schemes of less than 10 homes are phased to be built out within the next financial year unless the planning permission is from the previous financial year in which case it would build out in the following year. Schemes over 10 homes are phased two years from the plan's publication date, or in some cases earlier or later depending on site level information.

4.9 A bespoke approach has been used for all sites over 100 homes based on The Letwin Review and Start to Finish 2 where information on lead in an build outs has not been provided by site promoters. Only schemes with reserved matters, or the detailed elements of major hybrid schemes, are considered deliverable within the first five years. Sites with Outline Planning Permission are generally phased for development beyond the initial five years, except in cases where a hybrid permission or a reserved matters application demonstrates their deliverability within the first five years.

4.10 Of the deliverable sites, 40% of their capacity indicated for delivery after year 5 of the plan, aligning with the scale of development and a realistic assessment of construction rates. These sites are available for development now and meet the definition contained in the NPPF. Sites with only outline permission are not scheduled to deliver any homes within the first five years of the plan period.

4.11 **Developable site phasing:** In accordance with the NPPF, sites delivering homes within the second five years of the plan period are considered "Developable," signifying that they are suitable for housing development with a reasonable prospect of availability and viability. These sites have undergone assessment through the HELAA 2023 and have been submitted via the Call for Sites exercise process by developers. As part of the Annual Monitoring Process, the council also contacts major developers to update site phasing estimates. These sites include a range of site sizes. Smaller sites are primarily phased using an average across 5 years. Given the inherent uncertainty with these sites, these are high level estimates as there is a no precise science in determining the lead in times for when development will come forwards for such sites. Sites over 100 homes are phased as above.

4.12 Approximately 55% of the capacity of developable sites will be delivered prior to year 10 of the plan period, reflecting the realistic phasing of large sites over several years. Four major sites designated as developable will not deliver any homes before year 10 of the plan period, due to significant constraints and delivery challenges, such as contaminated land and the need to relocate or replace existing uses, including industrial, retail, and residential. A significant portion of the total capacity of developable sites will be delivered between years 6 and 17 of the plan period and even beyond.

4.13 **Potentially Developable site phasing:** A third category of sites was classified as "potentially developable" in the HELAA due to exceptional site constraints related to policy requirements, such as Green Belt, Flood Risk, Strategic Industrial Location (SIL), and challenges associated with land assembly and other uncertainties. These are sites that can only move forward for development through policies outlined in the Enfield Local Plan, which require a coordinated approach, including potential public sector intervention and funding for land assembly. This category encompasses broad locations for new settlements, as well as portions of the Enfield-owned land at the Meridian Water site and other significant development projects in town centres. Estimating accurate delivery rates and lead-in times for these sites is naturally more challenging. All of these sites are over 100 homes and therefore have been phased using the bespoke method described above.

4.14 When delivery rates have been provided by developers in their Call for Sites submissions, these have been cross-checked by officers against data in Lichfields' research on 'Start to Finish' (second edition)[16], which looks at the evidence on both speed and rate of delivery of housing on sites across England and Wales. In cases where such data is not available, delivery rates have been calculated based on the judgment of officers, drawing from information provided by the Letwin Review of Large Sites. In many instances, large sites in Enfield's ownership and/or delivery, and internal phasing information has been sourced from officers in the Housing and Regeneration division of the Council, further corroborated against industry benchmarks.

Five-year Housing Land Supply position

4.15 When compared to previous completion rates, the housing trajectory indicates an anticipated increase in the average annual completion rate over the next five years (from 2022/23 to 2024/25), with a total of 6,130 net completions over this period (accounting for expected demolitions), in addition to the windfall allowances outlined below. This translates to an average of 1,226 dwellings per year during this timeframe, reflecting the expected delivery of sites that are currently in the construction phase or possess valid planning permissions. It also includes other identified sites set to become available in the short term.

4.16 To ensure a continuous five-year supply of housing land throughout the entire plan period, it is anticipated that the Council will collaborate with developers to expedite the development of several smaller urban sites in the near to medium term, thereby contributing to the fulfilment of the borough's housing requirements.

Addressing delivery backlog using the 'Liverpool Method'

4.17 The table presented below highlights a deficiency in housing delivery compared to the borough's housing requirements during the previous five years. The Council managed to achieve 73% of the housing requirements in the Housing Delivery Test for the three-year period from 2019/20 to 2021/22, and has consequently published an action plan to address this. Consequently, there is a need to plan for addressing the backlog resulting from the past five years of housing delivery that fell short of our housing requirements during that period.

4.18 To tackle this backlog, the council is proposing a range of measures to rectify the under delivery. The specific actions are outlined in the Council's most recent Housing Delivery Action Plan, which concentrates on several key areas where targeted efforts can be implemented: maintaining housing delivery as a council priority, enhancing

[16] https://lichfields.uk/content/insights/start-to-finish

the Council's housing policy, streamlining and optimizing local planning authority processes, and promoting placemaking and collaborative partnerships.

Lapse rate of consented planning permissions

4.19 To obtain a current assessment of lapse rates, we have utilised data from the London Development Database (LDD), encompassing planning applications approved between 1 April 2009, and 31 March 2019. Data beyond this date is recorded in a new format, making it not directly comparable to historical data. Moreover, the historical data extends until the commencement of the plan period, making it the most appropriate assessment period for these purposes.

4.20 This dataset incorporates all applications that could have lapsed by 31 March 2022, as applications only lapse after three years of inactivity on the site, conditions discharge, or in the case of outline planning permissions, submission of reserved matters. Extended data beyond this period was unavailable, and more recent data would remain incomplete due to the three-year rule.

4.21 Over this 10-year period, the primary lapse rate was approximately 4.74%, meaning that around 5% of approved planning permissions for dwellings were not realised. Another 13% were replaced by subsequent planning permissions. Out of the 18 applications that were superseded, 10 were substituted by applications granted approval after 2019 and are therefore not included in this analysis. The remaining 8 were superseded by schemes considered in this analysis, which subsequently progressed to completion, albeit in some cases with a different number of homes than initially permitted. While superseded schemes did lead to delivery delays, they did not, in any instance, result in further lapses, and thus, such permissions are still counted as delivered in this analysis.

4.22 Based on this data, a headline lapse rate of 5% has been incorporated into the land supply calculations within the Local Plan. This implies that 886 dwellings across the land supply are estimated to lapse and not be delivered. This rate aligns with historical trends and introduces a certain level of buffer. However, this rate is not applied to the windfall allowance, as it is based on past trends in actual delivery and applying a lapse rate would lead to double counting.

4.23 Similarly, the 5% lapse rate has not been applied to the largest sites at Meridian Water and on Green Belt. These sites will have substantial public sector intervention in their delivery, which mitigates the risk of permissions lapsing. Nevertheless, these sites have been realistically phased, with lead-in times in accordance with evidence from the Letwin Review to account for delivery delays.

4.24 Such delays are substantiated by analyses conducted by Lichfields and other sources, and Enfield's data reveals that out of the 7,634 homes granted planning permission over the ten-year period prior to the plan, only around 49% (3,682) were fully completed. This is primarily attributed to the time gap between project starts and completions. Many schemes may have commenced but experienced no final completions.

4.25 Additionally, this analysis does not consider cases where some segments of large, phased developments have completed, delivering a portion of the total permitted homes. This time lag is already factored into the phasing of sites within the local plan housing trajectory and is not part of the overall lapse rate. In fact, the lapse rate in Enfield represents a relatively small attrition rate, and overall, the majority of planning permissions are carried out in their entirety.

Table 16: Lapse rate estimate based on London Development Database data up to March 2019

Year of permission	Completed	Lapsed	Started	Superseded	Grand Total
FY2009	250	47		78	375
FY2010	242	57			299
FY2011	240	32		81	353
FY2012	148	14		403	565
FY2013	502	23	356	231	1,112
FY2014	671	42			713
FY2015	497		555	7	1,059
FY2016	517	86	45	83	731
FY2017	245	31	1,281	128	1,685
FY2018	370	30	340	2	742
Grand Total	**3,682**	**362**	**2,577**	**1,013**	**7,634**

Extension of lapsed planning permissions due to Covid

4.26 Permissions that would have ordinarily lapsed between 23 March, 2020, and 31 December, 2020 (specifically, those approved from 23 March 2017, to 31 December 2017) were granted an extension until 1 May 2021. This extension is governed by section 93A of the Town and Country Planning Act 1990, which automatically extends the validity of unimplemented planning permissions with time limits for implementation. This extension covers permissions due to expire between 19 August 2020 (when these provisions came into effect) and 31 December, 2020, without the need to obtain Additional Environmental Approval.

4.27 Furthermore, unimplemented planning permissions with time limits for implementation that had passed between 23 March 2020, and 19 August 2020, have also been reinstated, with the time limit extended until 1 May 2021, provided that Additional Environmental Approval is granted. Details of the Additional Environmental Approval process are explained further below. Additionally, any deadlines for submitting applications seeking approval of reserved matters under an outline planning permission, which would otherwise have expired between 23 March, 2020, and 31 December, 2020, have been extended to 1 May, 2021.

5. Affordable Housing

5.1 This section outlines the planning policy framework and the supporting local demand evidence for affordable housing, which serve as the basis for the formulation of draft Policy H2 on the provision of affordable housing in the Enfield Local Plan. This section considers the policy issues and options which the council has considered to address the lack of affordable housing in Enfield, the priority for more and better homes, and the outcome of residents living in good quality homes they can afford.

National Planning Policy and Guidance

5.2 The National Planning Policy Framework (NPPF) sets the requirements for local planning authorities to accommodate their objectively assessed housing requirements. Paragraph 63 of the NPPF recognises the significance of evaluating and integrating housing needs, especially for those seeking affordable housing, into planning policies. It is noteworthy that the NPPF's definition of affordable housing now explicitly encompasses the need for affordable homeownership, in addition to the more traditional affordable or social rented housing.

5.3 As per the NPPF Paragraph 64, when there is a recognised demand for affordable housing, planning policies should specify the particular type of affordable housing that is necessary. Furthermore, Paragraph 34 of the NPPF states that plans must outline the contributions expected from development, including the levels and types of affordable housing provisions required. It is also emphasised that such policies should not undermine the practicality of the plan's implementation.

5.4 Local authorities bear the primary responsibility of identifying the need for affordable housing and formulating policies within the Local Plan to address this demand.

London Plan

5.5 The London Plan sets out the tenure split supported by the Mayor for affordable housing in Policy H7 Affordable Housing Tenure Clause A:

> *"The following split of affordable products should be applied to residential development:*
>
> *1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes*
>
> *2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership*
>
> *3) the remaining 40 per cent to be determined by the relevant borough as low cost rented homes or intermediate products (defined in H7 Part A1 and H7 Part A2) based on identified need."*

5.6 The remaining 40% is left to the discretion of the borough, determined by identified needs. While there's an expectation that this proportion will primarily focus on low-cost rented homes due to the considerable demand across London, the London Plan acknowledges that in some boroughs, a more diverse range of affordable housing tenures may be more suitable. This could be due to financial viability constraints or the potential to create a more varied and inclusive community.

5.7 Policies H5 and H6 in the London Plan outline the Mayor's strategy for delivering affordable housing and introduce the viability threshold approach. Policy H5 establishes a strategic target for 50% of new residences in London to be categorised as "genuinely affordable." This includes the stipulation that developments on public land must provide 50% affordable housing.

5.8 Major developments that trigger affordable housing requirements are evaluated according to Policy H6, which defines the threshold approach. This approach necessitates that a minimum of 35% of the total residential development should be designated as affordable housing, with this requirement rising to 50% on public sector land. In cases where these thresholds cannot be met, individual viability assessments are mandated to maximise the level of affordable housing provision.

Affordable Housing need in Enfield

5.9 The analysis has been guided by the NPPF and accompanying guidance, alongside data resources maintained by the Council, which have contributed to the formulation of the Enfield Local Housing Needs Assessment (LHNA). Additional guidance has been drawn from the recent GLA Intermediate Housing Consultation and the supporting research note published in 2020. This guidance clearly distinguishes between households seeking affordable homeownership or intermediate rents and those in need of social or affordable rented housing.

5.10 Similar to many other areas in London, Enfield confronts a significant shortage of genuinely affordable housing. There is a pressing need to increase the supply of affordable homes to address the varied requirements of the expanding population. This entails a broader range of affordable housing options and well-designed homes of suitable size, tenure, and cost that can be afforded by local residents, particularly those with lower incomes.

5.11 Enfield's LHNA presents estimates for two distinct categories of households that may seek or require affordable housing. The need for social/affordable rented housing is projected at 711 homes per annum, based on various factors such as the current waiting list maintained by the Council, the formation of new households unable to meet their needs in the market, and the annual availability of social and other affordable rented housing through lettings.

5.12 An additional estimate of 698 households per annum is identified as requiring intermediate and affordable owned homes. This estimate is based on several factors, including the backlog of households residing in the private rented sector who may prefer to purchase, the proportion of newly forming households likely to rent but unable to buy, and the supply of intermediate (shared ownership) properties available for resale.

5.13 It is essential to note that Enfield does not presently maintain a waiting list of households interested in or eligible for intermediate or affordable homeownership properties. These households are generally not facing acute housing needs and are not lacking housing; rather, most of them express a preference for homeownership over renting.

5.14 When combining both estimates, a total of 1,407 households per year require some form of affordable housing in Enfield. This surpasses the London Plan target of 1,246 per annum for the period 2019 to 2029, underscoring the challenge of delivering a sufficient number of affordable homes to meet local needs, especially those not addressed through the usual turnover of affordable housing (e.g., existing homes becoming vacant).

Affordable Housing supply in Enfield

5.15 During the ten-year period from 2010/11 to 2019/20, a total of 1,690 affordable dwellings were constructed in Enfield, constituting 27% of all newly built dwellings. The average annual net addition of homes completed during this period was 512, which falls significantly short of the potential housing requirement of 1,246.

5.16 A substantial disparity exists between the actual delivery of affordable housing in previous years and the estimated need for affordable housing in the Borough. This gap has been steadily increasing in Enfield, as well as in other local authority areas. Core Policy 2 of the Core Strategy 2010 aimed to achieve 560 homes per year from 2010/11 to 2024/25, while Core Policy 3 aimed to have 40% of the 560 homes per year target designated as affordable, amounting to 224 affordable homes. Within this, 70% were intended to be social rented housing, equivalent to 157 homes.

5.17 It is important to note that the delivery of new homes resulting from permitted development conversions of office spaces in Enfield has not contributed to the provision of affordable housing.

Key Challenges for meeting Affordable Housing Need in Enfield

5.18 Enfield is facing a shortage of social and affordable rented homes, with a growing number of individuals with low incomes residing in the private rented sector. The escalating unaffordability and insecurity within the local private rental market is evident from the increasing homelessness rates and the prevalence of individuals living in inadequate housing. Our population is on the rise, accompanied by a growing number of low-income households.

5.19 Concurrently, the cost of rents in the private sector is swiftly increasing, alongside a rising number of private rented homes in the borough. This translates to a greater proportion of low-income individuals contending with precarious tenancies and, in many cases, substandard living conditions. According to Census 2021 data, 53.4% of Enfield's residents either owned their homes, had mortgages on their properties, or were engaged in shared ownership, a decrease from the 58.8% reported in 2011. In 2022-23, the average selling price for homes in Enfield was £560,997.

5.20 In Enfield, 25% of low-income households residing in the private rented sector have expenses exceeding their income, primarily due to housing costs. The substantial rent hikes in outer London areas, including Enfield, have been significantly impacted by the freeze on Local Housing Allowance, resulting in notable reductions in affordability over recent years. For numerous properties in the private rented sector, including those with lower quartile rents, the Local Housing Allowance falls short of the actual rent being charged, presenting affordability challenges to renters who rely on Housing Benefit for all or part of their rent. Less than 15% of properties in Enfield meet the criteria of being 'affordable' based on Local Housing Allowance rates (LHA), as illustrated in the table below.

Table 17: Local housing allowance rates versus average private sector rents in Enfield by number of bedrooms

	1 bed	2 bed	3 bed	4 bed	5 bed
LHA 2020	£1,067	£1,296	£1,596	£1,895	£1,895
Average Rent 2021	£1,000	£1,400	£1,780	£2,090	£2,780
Average Rent 2022	£1,070	£1,510	£2,000	£2,490	£3,060
Annual change	6.80%	7.60%	12.00%	18.90%	10.10%

5.21 In Enfield, more than half of all Housing Benefit recipients reside in the private rented sector, and nearly two-thirds of them are employed. Many of these residents do not qualify as having a high-priority need for social or affordable housing. In 2019, the Smith Institute conducted a research study, commissioned to explore the factors contributing to homelessness in the borough and to formulate a response to the 246% increase in homelessness acceptances between 2010 and 2017.

5.22 The central finding of the Smith Institute's research was that poverty serves as the primary catalyst for homelessness. What distinguishes Enfield from other London boroughs is the substantial number of financially disadvantaged households residing in the private rented sector. The convergence of these factors i.e. low financial resilience among households and the relatively dynamic nature of the private rental housing market, has resulted in a 246% increase in homelessness acceptances in Enfield over a seven-year span, compared to a 35% increase across London.

5.23 The mounting homelessness issue in Enfield has led to a surge in individuals residing in temporary accommodation. Enfield holds the record for the highest number of no-fault Section 21 Evictions in London. The figures for 2022/23 indicate that 126 repossessions were carried out through 'accelerated possession orders' in Enfield, up from 97 in the previous year. The number of repossessions through Section 21 has nearly doubled across England and Wales, increasing from slightly over 4,026 in the year ending March 2022 to 8,048 in 2022-23, surpassing pre-pandemic levels.

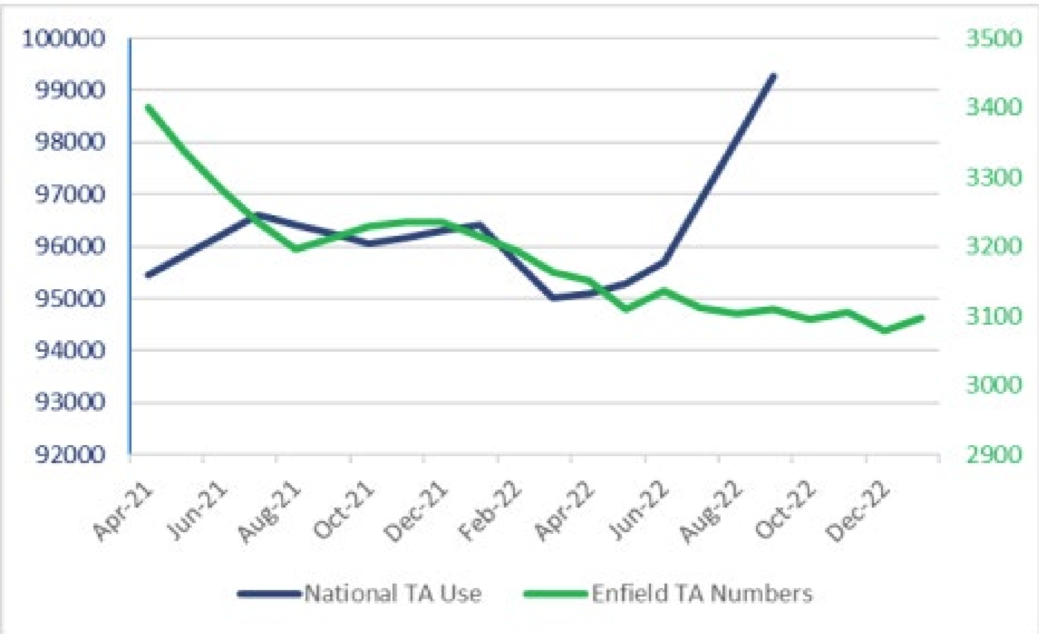
5.24 The combination of landlords evicting tenants and the ongoing cost of living crisis has led to a surge in households seeking assistance from the Council. The number of households approaching the Council for housing-related aid has risen from 196 in October 2021 to 464 in February 2023. The table below offers a three-year overview of the number of households contacting the council for housing support due to homelessness and the resulting count of households entering emergency temporary accommodation.

Table 18: Homelessness approaches and temporary accommodation entries, monthly totals, 2019-22

	Oct-19	Oct-20	Oct-21	Oct-22
Homelessness approaches	184	196	275	308
Temporary accommodation entries	71	45	45	19

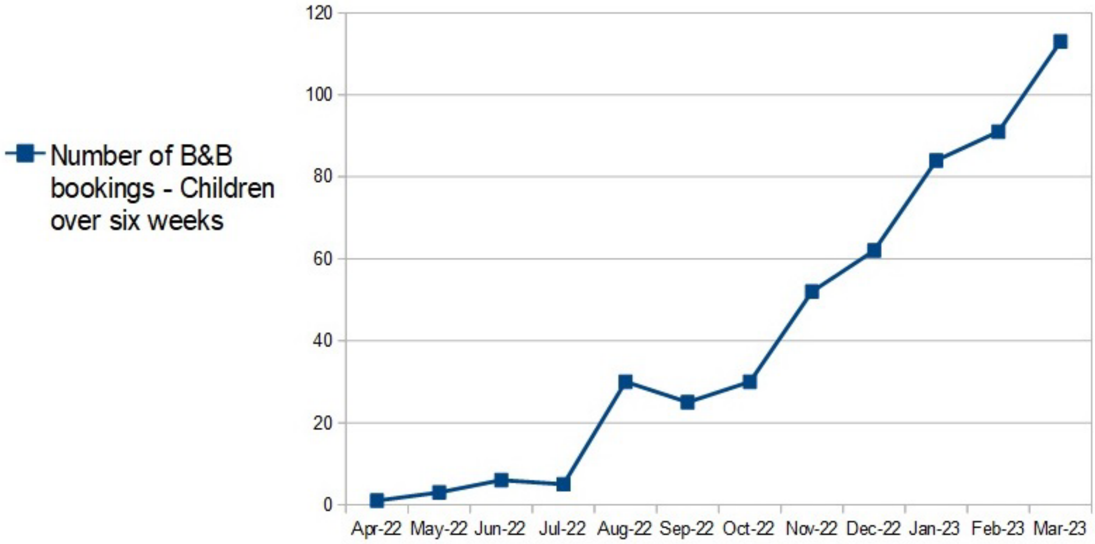
5.25 Extended stays in temporary accommodation are not a viable or stable housing solution and impose a considerable financial burden on the Council. Typically, the path out of temporary accommodation leads to entry into the private rented sector. The escalating homelessness rate has resulted in a consistent increase in the count of households residing in long-term temporary accommodation, with over 3,000 households living in such arrangements by the close of 2022. Remarkably, over 10% of these households have endured this predicament for more than a decade, dating back to before November 2012.

Figure 5.1: Families in Temporary Accommodation in Enfield and Nationally, 18 months to December 2022



5.26 As of March 2023, there were also 113 families with children in Enfield who had resided in hotels and B&Bs for more than six weeks. These facilities offer short-term temporary accommodation but lack cooking amenities or shared cooking and washing facilities. This marks a significant increase from just one family in April 2022, resulting in a monthly expenditure exceeding £850,000 for the authority. As a consequence, there was a budget deficit of £6 million in the previous year. Although there are numerous individual tenants in Enfield who live alone, the authority possesses only 167 four and five-bedroom homes. This situation poses a substantial challenge in terms of addressing the housing requirements, especially considering that over half of the available homes are apartments.

Figure 5.2: Number of children living in B&Bs in Enfield, year to March 2023



5.27 Put simply, Enfield Council needs to acquire approximately 50 homes each month to accommodate households newly seeking emergency housing from the council. To achieve a sustained reduction in the utilization of hotel accommodation, a minimum of 100 properties per month is necessary. Currently, the council can secure around 10 properties per month within a one-and-a-half-hour travel radius of Enfield. In June 2023, the council endorsed a new strategy for relocating residents outside the borough, underscoring the significant demand for affordable housing that cannot presently be met within the council's jurisdiction or London as a whole.

5.28 A greater concentration of homelessness and households in temporary accommodation is observed in the eastern part of the borough. This is mainly due to the relatively affordable private rented sector housing, allowing households to access accommodation with housing benefits. Conversely, the western part of the borough exhibits more restricted availability of social housing and higher private rented rents.

5.29 There is evidence indicating substantial placements of homeless households from other London boroughs into Enfield, particularly from boroughs with higher rental costs. This phenomenon has contributed to what could be termed a 'dysfunctional' private rented housing market in specific areas of the borough, such as Edmonton in the southeast. In these areas, the sector appears to be influenced by housing benefits, homelessness, and private sector landlords receiving incentive payments from multiple councils to house their homeless households.

5.30 The substantial number of households residing in temporary accommodation results in these households with acute needs dominating the council's housing register. Consequently, the council has had to focus much of its efforts on addressing this acute need, which limits its capacity to address broader housing requirements.

Welfare Reforms

5.31 Welfare reforms introduced since 2011, commencing with the reforms to the Local Housing Allowance and continuing with the reduction of the Household Benefit Cap, have had a significant impact on the composition of private rented households in

Enfield. An important challenge when trying to predict future requirements is that the effects of these welfare reforms are still reverberating. This makes it less dependable to simply extend trends from previous years, especially when considering aspects like the number of households relying on Housing Benefit (HB).

5.32 Families with a high number of children have been disproportionately impacted by the Overall Benefit Cap. This has resulted in a growing demand for larger housing, which was previously being satisfied in the private rental sector but is no longer feasible within that tenure. Consequently, many of these families have transitioned to Temporary Accommodation. The long-term implications of these changes on demographic projections remain uncertain.

Permitted development and changes to the Use Classes Order

5.33 In addition to constructing new buildings, increasing the housing supply can also be facilitated by altering the usage of different types of structures. Permitted development rights (PDRs) grant individuals the "right to develop without the necessity of seeking planning permission."

5.34 Starting from 2013, the transformation of office spaces into residential properties has been categorized under PDR regulations, and these regulations transitioned from being temporary to permanent in April 2016. Between 2015/16 and 2017/18, a remarkable 91% of PDR conversions in England involved the conversion of offices into residential units, resulting in approximately 42,000 new homes.

5.35 Concerns surrounding PDR stem from the absence of thorough planning oversight regarding project quality and the limited funding provided by developers for affordable housing and broader community contributions.

5.36 The impact of PDR, especially in the context of office-to-residential conversions, varies from one local authority to another. However, for Enfield, this is a significant issue, and it is covered in more extensive detail in a separate housing research report submitted to Enfield Council by AECOM. It is noteworthy that subsequent to this research, the government has updated the Use Class Order, further simplifying the conversion process between residential and commercial structures.

Affordable Housing on Strategic Sites

5.37 The Local Plan’s Viability Assessment identified significant variations in viability across different geographical areas within the borough. Consequently, it suggested that an area-specific approach to housing tenure might be appropriate. The Enfield Whole Plan Viability Assessment from April 2021 revealed that greenfield land in more affluent areas of the borough is likely to support higher levels of affordable housing, potentially reaching up to 50%, as well as substantial developer contributions, amounting to at least £50,000 per unit, in addition to the existing Community Infrastructure Levy (CIL) rates. These findings indicate that affordable housing on greenfield land is not only more viable in quantitative terms but also forms a larger proportion of the overall housing offering compared to other parts of the borough. The affordable housing policy aligns with the conclusions drawn from both the Local Housing Needs Assessment and the findings of the Comprehensive Plan Viability Assessment.

5.38 As a response to these findings, a 50% affordable housing requirement was established for housing projects involving development on Green Belt land. This target aims to assist the Council in securing much-needed family-sized affordable homes in those areas. The LHNA sets out a target need figure of 1,407 affordable homes per year. This would not be viable to deliver given that it represents fully 90% of the overall land supply proposed in the plan. However, estimates based on an analysis of site allocations and other land supply including completions and potential windfall estimates suggests that the allocation of Crews Hill and Chase Park makes a material difference to the number of new affordable homes delivered in Enfield in the period to 2041 (and beyond).

5.39 Based on the analysis above, it is estimated that the addition of Crews Hill and Chase Park to the allocations in the plan, and taking account of completions and windfall estimates, could have the effect of increasing the overall supply of family housing in the plan from around 10,300 to 13,300 all things being equal. This represents a material increase of around 3,000 affordable homes over the plan period. This is a high level estimate which assumes high levels of policy compliant schemes coming forwards in line with the typologies set out in the proposed site allocations. Such projections are naturally based on a series of assumptions and the actual delivery of affordable housing over the plan period will be highly dependent on wider economic and grant funding conditions, around which there is no certainty at this point in time. Therefore, these estimates have been treated with caution when formulating policies and do not prejudice the submission of individual planning applications and the development of detailed masterplans for these sites.

Approach to Policy H2 Affordable Housing

5.40 The primary objective of the draft Enfield Local Plan is to set a borough-wide goal of achieving 50% affordable housing from the annual target of 1,246 homes. This translates to 623 affordable homes each year, a significant increase from the 224 affordable homes stipulated in the Core Strategy of 2010. Draft Policy H2 prescribes affordable housing requirements based on the nature and location of the development. It necessitates 50% affordable housing for estate regeneration projects, Council-owned sites, developments on industrial land that result in the loss of industrial space, and housing projects within the Green Belt. The policy establishes a minimum expectation of 35% affordable housing for all other major developments. This approach aligns with the principles of the London Plan and is informed by the Whole Plan Viability assessment. The draft Plan not only increases the overall requirement for affordable housing but also strives to ensure that the resulting homes align with these objectives.

5.41 The draft Enfield Local Plan follows the approach outlined in the recently set out in the London Plan. The target of 50% affordable housing is a minimum requirement for all qualifying housing proposals, rather than an inflexible standard. Our guidance is drawn from the Enfield Local Housing Needs Assessment, Enfield Intermediate Housing Policy, the London Plan 2021, and the NPPF in matters related to affordable housing. This policy framework sits alongside Enfield's Housing and Growth Strategy 2020-2030 which aims to increase the supply of affordable housing through a range of initiatives including a significant house building programme and small sites initiatives.

Tenure Mix

5.42 According to the 2020 Enfield Local Housing Needs Assessment (LHNA), there is a requirement for 1,407 affordable homes annually to address the combined need for affordable/social rented housing (711 homes) and affordable homeownership or intermediate rented housing (696 homes). This points toward a policy approach involving an equal split of 50% for social/affordable rented housing and 50% for intermediate housing.

5.43 Consistent with the principles of the London Plan, the focus will be on the following genuinely affordable home types:

- Housing at social rent levels, including London Social Rent and London Affordable Rent;
- London Living Rent;
- London Shared Ownership.

5.44 The proposed development's tenure mix is expected to align with the preferred mix detailed in Policy H2, although it is acknowledged that a rigid application of these requirements may not be suitable in all cases. It is deemed unsound and impractical to dictate the specific types of intermediate housing products for individual development sites. Therefore, the draft policy maintains flexibility in this regard. Individual applications will be subject to comprehensive viability assessments if they fall short of the affordable housing quota set by the local plan policy, with the aim of demonstrating that this level cannot be viably achieved. The Whole Plan Viability assessment indicates that, based on current values, having a proportion of social rented housing greater than 50% would be financially unviable in most parts of Enfield.

5.45 Other forms of affordable housing, such as community-led housing (as outlined in Policy DM H6), will also receive support provided they meet the London Housing Strategy's definition of genuinely affordable housing and are recognized as genuinely affordable.

First Homes

5.46 At the end of June 2021, the government introduced a new type of affordable housing known as First Homes. First Homes constitute a specific category of discounted market-sale housing and should be regarded as meeting the definition of 'affordable housing' for planning purposes.

5.47 These homes must be sold at a minimum discount of 30% below market value and are intended for first-time buyers with a household income in Greater London of less than £90,000, where at least 50% of the home's purchase price is secured through a mortgage. We are obligated to secure a minimum of 25% of all affordable housing units as First Homes through developer contributions on an ongoing basis. Our affordable housing policy requirements allow for the incorporation of the Government's policy when negotiating affordable housing arrangements.

5.48 In the case of Enfield, it is unlikely that First Homes will fulfil the criteria for affordable housing. Moreover, the cost associated with constructing First Homes at the necessary discount level is likely to render many schemes financially unviable. Consequently, our preference will lean toward shared ownership housing, where applicable. This position aligns with the Mayor of London's Housing Strategy of 2017 and the relevant funding program agreements. If developers wish to offer First Homes, they will be required to demonstrate that these are affordable for local residents and will contribute at a similar level as other affordable housing tenures, in accordance with Planning Practice Guidance.

6. Housing size and type

6.1 This section sets out the background evidence on the local need for a specific dwelling size mix that informs draft Policy H3 Housing mix and type and the site allocations within the draft Enfield Local Plan. It sets out the policy issues and options the council has considered to meet the needs of local residents, and in particular the corporate priority to provide a greater amount of larger family housing, as defined by the London Plan.

National Planning policy and Guidance

6.2 The NPPF requires local planning authorities to provide for their objectively assessed housing needs. Paragraph 60 sets out the need to boost the supply of housing while ensuring at the same time that the needs of groups with specific requirements are addressed in the context of general needs supply. Paragraph 62 sets out that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

6.3 The PPG sets out that Local authorities should set clear policies to address the housing needs of different groups including the need for student housing, housing for the elderly, and other groups. The key role for local authorities is to identify the need for housing for different groups and to set out polices to address this in the Local Plan.

The London Plan

6.4 The London Plan, as outlined in Policy H10, stipulates that development schemes should encompass various unit sizes. This should be done by considering well-substantiated local evidence of demand, the aim of creating diverse and inclusive communities by considering factors such as price ranges and tenures, the nature and location of the site, and the necessity to optimize land utilization. Additionally, the Glossary of the London Plan defines family housing as dwellings with dimensions, layout, and design suitable for family living, typically comprising three, four, five, or more bedrooms.

Housing size and type need in Enfield

6.5 Enfield’s Local Housing Needs Assessment (LHNA) provides insight into the likely mix of housing required over the planning period and the current housing stock available to Enfield's residents. However, several factors can influence the types of homes that can be feasibly developed on particular sites, including considerations of viability, design, and other relevant factors.

6.6 Enfield needs a balanced mix of housing, encompassing both market and affordable tenures, to address the evolving requirements of its expanding population. A crucial component of fulfilling the housing need and demand is ensuring that new housing is appropriately sized and designed, and that the existing housing stock is effectively managed through development management.

Table 19: AMR tables showing size mix of housing 2013-2022

Year	One bedroom		Two bedrooms		Three bedrooms		Four bedrooms		Five bedrooms and larger		Total (gross)
	No of units	%	No of units	%	No of units	%	No of units	%	No of units	%	
2013/14	260	36%	315	43%	102	14%	33	5%	16	2%	726
2014/15	174	36%	181	38%	89	19%	28	6%	5	1%	477
2015/16	272	34%	282	35%	162	20%	75	9%	8	1%	799
2016/17	453	45%	279	28%	175	17%	84	8%	18	2%	1,009
2017/18	154	28%	260	47%	100	18%	32	6%	8	1%	554
2018/19	128	21%	140	23%	207	34%	112	19%	16	3%	603
2019/20	188	40%	216	47%	56	12%	4	1%	1	0%	465
2020/21	335	41%	283	35%	139	17%	22	3%	33	4%	812
2021/22	292	35%	248	29%	162	19%	64	8%	24	3%	844

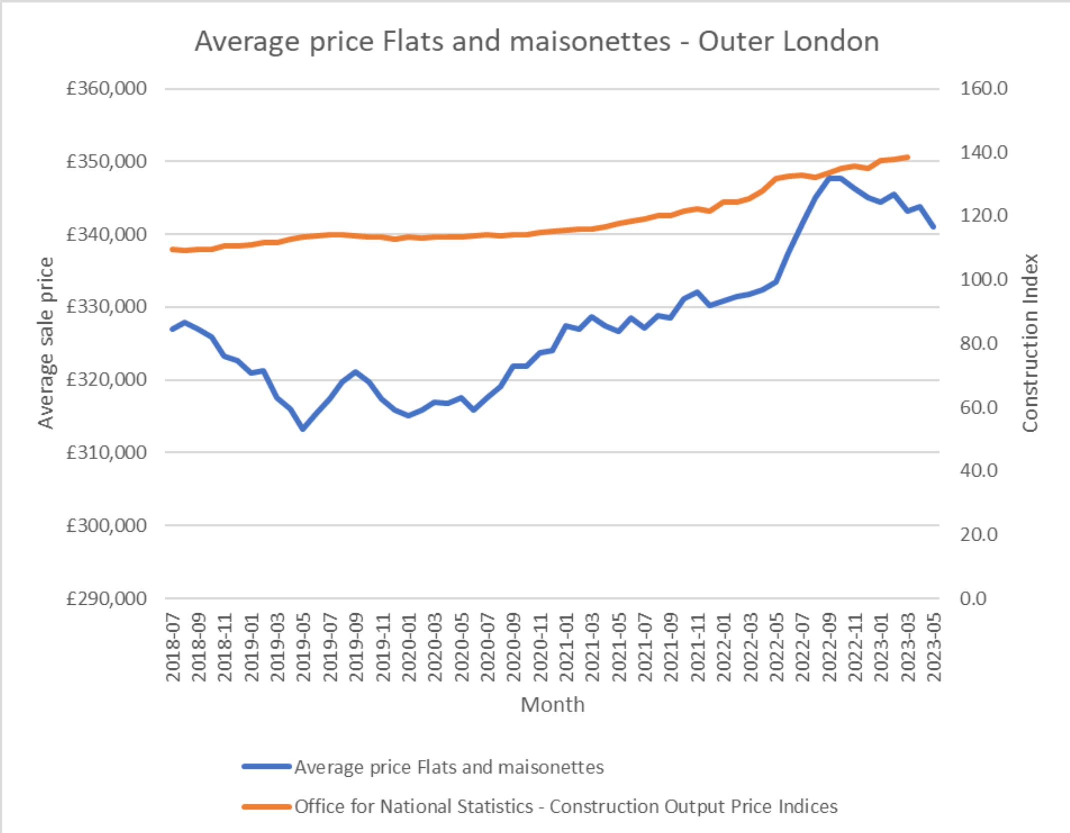
6.7 Enfield Council monitors new building and changes to the existing housing stock in detail via annual Authority Monitoring Reports. The table above illustrates the past 10 years of housing delivery, 71% of delivery has been smaller one and two bedroom homes. This reflects delivery coming forward as part of new schemes as well as delivery from the subdivision of the existing stock. This highlights the very serious under-provision by the market of larger family housing in Enfield.

Key challenges in delivering the Appropriate Housing Mix

6.8 The priorities outlined in the preliminary policy are meant to serve as a reference for determining the mix of dwelling sizes in new housing developments in Enfield. Nevertheless, there is substantial evidence indicating that adhering to the LHNA mix in Enfield will present challenges. The preliminary Local Plan Viability Assessment indicates that, particularly in the less valuable areas in the eastern part of the borough, achieving medium and lower density schemes with fewer than 150 dwellings per hectare in compliance with policy-affordable housing levels is a challenge, except for sites with fewer than 10 units. Larger sites at these densities do not meet the land value benchmarks required for feasible development. This is because, while costs and land values may remain relatively stable, residential sale values are lower in the eastern half of the borough, and the economics of lower density schemes do not align.

6.9 Research carried out by Jones Lang LaSalle for Enfield's Housing and Regeneration Team, which focused on the southeastern part of the borough, revealed that the average cost of three-bedroom new build flats in the area was £615,000, while existing three-bedroom houses were priced around £490,000, and four-bedroom houses around £595,000. This illustrates the challenge of pricing such homes competitively in many areas due to construction costs compared to existing properties, a challenge further compounded by significant increases in construction costs in recent years, in contrast to the limited price appreciation of London flats. The chart below illustrates that while flat prices have risen by 12.5% over the past five years, construction costs have surged at more than double this rate, with an increase of 26.7%.

Figure 6.1: Property process versus construction costs 2018-2023



6.10 Consequently, many sites need to be at higher densities to become financially viable. Nevertheless, achieving the policy-compliant housing mix as outlined in the LHNA (i.e., 60% larger homes, typically with 3+ bedrooms conforming to the London Plan's family housing definition based on size, design, and layout, and 40% smaller homes with 1 or 2 bedrooms) on sites with densities exceeding 150 dwellings is exceedingly challenging for several design-related reasons. Moreover, as construction costs rise with increasing height and density, sales values do not see a corresponding increase, and they may even decrease. This poses a challenge to the objective of delivering family homes in Enfield's urban areas, especially in the eastern part of the borough. In this context, striving for the desired mix, which is most easily attainable at lower densities of 35-40 dwellings per hectare net, presents insurmountable viability issues that would impede development in accordance with the plan.

6.11 This challenge is supported by the proposed site allocations. A thorough evaluation of the suggested site allocations, conducted with a design-focused approach based on GLA's typologies and informed by various case studies, optimised by urban designers to accommodate specific site contexts, has revealed that approximately one-third of homes in new site allocations within the urban area, without existing consent, will have three bedrooms or more. This clearly falls below the LHNA target and mirrors past trends. AMR data demonstrates that over the past decade, 70% of new homes delivered in Enfield have consisted of 1 and 2-bedroom homes. Furthermore, data from the HELAA indicates that 76% of homes already granted consent and anticipated to be built during the plan period are of smaller sizes, see table below.

Table 20: Analysis of site allocations versus LHNA requirements

	Studio	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Number of homes	450	6674	8816	4137	1503
Percentage	**2%**	**31%**	**41%**	**19%**	**7%**
		74%		26%	
LHNA Requirement		11%	29%	42%	19%
		40%		60%	

Housing mix on Strategic Sites

6.12 In light of the challenges mentioned earlier, a strategic decision has been taken to modify the housing mix requirement from what is specified in the LHNA, particularly for the strategic Green Belt sites. This adjustment acknowledges the more favourable viability conditions in these areas, where it is more feasible to deliver larger family-sized homes and achieve medium densities—factors that present greater challenges in the urban settings. Initial assessments of viability indicate that in these greenfield regions, the values per square metre for flats closely resemble those of houses, but construction costs are expected to be higher. This suggests a greater need to provide family homes on these sites. It is worth noting that even if the full capacity of these sites were used to deliver larger three and four-bedroom homes without any 1 and 2-bedroom homes, this would still fall short of achieving the LHNA's target mix across the entire supply throughout the plan period, encompassing site allocations and committed schemes. Moreover, this approach would not align with the NPPF and London Plan’s requirements that emphasise the efficient use of land, site optimisation, and the promotion of inclusive, mixed, and well-balanced communities. The table below outlines the proposed target mix for the Green Belt sites.

Table 21: Proposed housing mix across strategic sites at Crews Hill and Chase Park

	1 Bedroom/Studio	2 Bedrooms	3 Bedrooms	4 Bedrooms
Proportion	12%	27%	41%	19%

6.13 Taking the LHNA targets as a starting point, and set against the overall housing supply set out in the plan of 34,710 homes between 2019 and 2041, a requirement of 60% larger family sized homes in line with the London Plan definition would mean a target of around 20,800 larger homes across the plan period (60% of 34,710).

6.14 Based on the analysis above, it is estimated that the addition of Crews Hill and Chase Park to the allocations in the plan, and taking account of completions and windfall estimates, could have the effect of increasing the overall supply of family housing in the plan from by around 3,600 homes from 8,600 (30% of the total) to 12,200 (35% of the total), all things being equal. This remains far below the target mix of 60%, but these sites would make an important contribution to meeting the target mix set out in the LHNA.

6.15 This is a high level estimate which assumes high levels of policy compliant schemes coming forwards in line with the typologies set out in the proposed site allocations. Such projections are naturally based on a series of assumptions and the actual delivery of family housing over the plan period will be highly dependent on wider economic conditions, around which there is limited certainty at this point in time. Therefore, these estimates have been treated with caution when formulating policies and do not prejudice the submission of individual planning applications and the development of detailed masterplans for these sites.

Approach to Policy H3: Housing Mix and Type

Dwelling size and mix – evidence

6.16 Policy H3 in the local plan serves as a guideline to inform the composition of housing size mix in new housing developments within Enfield. Assessments conducted as part of the Local Housing Needs Assessment (LHNA) suggest that the majority of new households anticipated over the planning period will likely require larger homes, particularly those with three bedrooms or more. The policy has been drafted to give effect to this requirement without prejudicing the delivery of smaller homes for those who need them. The approach is considered to align with the London Plan definition of family housing, which comprises dwellings which 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.

6.17 In the social and affordable rent sector, most households require two or three bedrooms, while in the market sector, most households need three or four bedrooms. Regarding the size of affordable dwellings needed by those currently experiencing acute housing need on the waiting list:

- 14.7% require one-bedroom,
- 35.3% require two-bedroom,
- 42.3% require three-bedroom, and
- 7.7% require four or more bedrooms.

6.18 The LHNA suggests that the primary focus for affordable homeownership options should be on one and two-bedroom housing units. This is because the majority of households residing in intermediate (shared ownership) housing do not have children. Specifically, 59% are single households, and 33% are couples without children. Nevertheless, 7.5% of those living in intermediate housing are households with children. This illustrates that, while relatively smaller in scale, there is still demand for family-sized intermediate housing.

6.19 The LHNA's modelling indicates that the largest demand in the market sector will be for 3- and 4-bedroom homes, which are family-sized accommodations as defined by the London Plan. Slightly over one-quarter of households are likely to require 1- and

2-bedroom properties. It's essential to emphasize that this demand is driven by demographic shifts within the Borough and does not imply that existing Enfield households will be able to afford such new family-sized housing. It's worth noting that, while in certain circumstances, such as affordable housing, 2-bedroom flats can be suitable for families, the analysis below underscores the substantial need and demand for larger family-sized homes, particularly those that are designed to accommodate larger families. The following section outlines some of the challenges in delivering these larger homes.

Table 22: LHNA overall dwelling type/size and tenure mix under baseline demographic scenario

Dwelling type/size	Tenure		Total
	Market (50%)	Affordable (50%)	
1-bedroom house	12	0	12
2-bedroom house	64	105	170
3-bedroom house	201	256	457
4 or more-bedroom house	188	44	232
1-bedroom level-access	28	92	120
2 -bedroom level access	72	115	187
3 or more-bedroom level-access	57	11	69
Total	623	623	1,246
Dwelling type	**Market (50%)**	**Affordable (50%)**	**Total**
House	466	405	871
Level-access	157	218	375
Total	623	623	1,246
Number of bedrooms	**Market (50%)**	**Affordable (50%)**	**Total**
1	40 (6.4%)	92 (14.7%)	132 (10.6%)
2	137 (21.9%)	220 (35.3%)	357 (28.6%)
3	258 (41.4%)	267 (42.8%)	525 (42.1%)
4	188 (30.1%)	44 (7.0%)	232 (18.6%)
Total	623 (100%)	623 (100%)	1,246 (100%)

6.20 When evaluating the suitability of the mix of dwelling sizes, consideration will be given to specific circumstances of individual sites, including factors like location, the area's character, site constraints, financial viability, and the objective of establishing diverse and well-balanced communities. The Council will accommodate flexibility in estate regeneration schemes, especially when the dwelling mix has been determined through extensive consultation with residents, taking into account their specific requirements.

6.21 Additionally, flexibility will be extended to developments catering to retirement, sheltered, or extra care housing. However, deviations from the policy will only be justified when the evidence convincingly demonstrates that the priorities in the proposed development's catchment area deviate from those set out in the LHNA. In addition to the number of bedrooms in properties, there are instances where the overall floorspace area of new homes needs to be considered.

6.22 Whilst homes are required to meet the minimum nationally described space standards as set out in the London Plan, at times schemes may come forward that provide homes which are significant larger than minimum standards. In some cases this can compromise the overall mix of housing to be provided on the site, as well as the objective of maximising housing delivery and making efficient use of land, both of which are set out clearly in the NPPF. As such, there may be schemes where revisions are required to ensure that these objectives are met.

7. Housing for other specific group

7.1 This section sets out the wider planning policy framework and background information on the local need for a mix of housing for specific groups that informs draft Policies H5 for delivering supported and specialist housing, H6 for community-led housing, H7 on build to rent, H8 on large scale purpose built shared living, H9 on student accommodation and the context for H10 and Enfield's emerging Traveller Local Plan on traveller accommodation.

Build to Rent

7.2 Build to rent, as set out in the NPPF and London Plan, is purpose-built housing that is typically 100% rented out and under unified management provisions. Build to rent is a valuable addition to Enfield's housing market, expanding the housing sector's capacity to deliver new homes. In line with the London Plan, Build to Rent (BtR) applications must adhere to specified levels of affordable housing provision.

7.3 Policy H7 on Build to Rent in the Local Plan stipulates that developments should incorporate a portion of low-cost and London Living Rent homes, designed to assist households with average incomes in saving for a deposit to purchase their own homes. The covenant period for these schemes in Enfield is set at a minimum of 15 years to ensure their sustained contribution to addressing housing needs across all tenures in the borough. A claw-back mechanism, in accordance with the policies of the London Plan and national build-to-rent guidelines, will be applied to protect the value of the affordable housing provision should units in build-to-rent developments be converted to a different tenure after the covenant period lapses.

7.4 The inclusion of low-cost and London Living Rent homes within build-to-rent developments is aimed at aiding households with average incomes in their efforts to save for a down payment to purchase their own homes. These schemes in Enfield are subject to a covenant period of at least 15 years to ensure their enduring contribution to meeting housing needs across all housing types in the borough. A claw-back mechanism, aligned with the policies of the London Plan and national build-to-rent guidelines, will be implemented to safeguard the value of affordable housing provision in case such units within build-to-rent buildings are converted to a different tenure once the covenant period expires.

7.5 Following the guidelines of the London Plan, 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[17] and can be integrated into planning policy.

7.6 The new Local Plan relies on current and up-to-date evidence, including viability assessments. The proposed affordable housing requirements 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. The affordable housing requirements outlined in Policy H2 will also apply to build-to-rent developments.

[17] https://governance.enfield.gov.uk/documents/s82460/Intermediate%20Housing%20Policy%20-

Supported and Specialist Housing

7.7 The NPPF recognises the existence of various distinct household groups with specific housing requirements. It highlights the importance of planning policy in considering and evaluating the housing needs of these different groups, encompassing a wide spectrum of households. These groups include those in need of affordable housing, families with children, older individuals, students, people with disabilities, service families, travellers, renters, and individuals looking to commission or construct their own homes.

7.8 As stated in paragraph 017 of the PPG, the need for housing for specific groups of people may exceed the overall housing need figure calculated using the standard method. This is because the needs of particular groups are often determined by considering the entire population of an area as a baseline, rather than relying solely on the projected new households used in the standard method. When formulating policies to address the requirements of specific groups, strategic policy-making authorities must find ways to accommodate the needs of these individual groups while still adhering to the constraints imposed by the overall established need.

7.9 The subsequent sections consider the remaining paragraph 61 groups, and we also extend this discussion to include other vulnerable groups in Enfield. The LHNA has also identified the housing needs of specific demographic groups within the population. Two groups with substantial and potentially increasing needs during the plan period are poised to impact the demand for housing in the borough, particularly in terms of specialized accommodation.

Older persons housing

7.10 From 2018 to 2036, the population of individuals aged 65 and above is projected to increase by around 50%, as indicated by both ONS and GLA population projections. The most substantial proportional growth is anticipated in the age group of 85 and above, with an estimated increase ranging from 70% to 80%, depending on the specific projection data under consideration. These trends correspond with the conclusions outlined in the Enfield Joint Strategic Needs Assessment.

Table 23: Population change in older age categories between 2018 and 2036[18]

	ONS projections				GLA projections			
Older age groups	2018	2036	Number change	% change	2018	2036	Number change	% change
All Older 65+	44,000	67,700	23,700	**53.9**	43,739	66,261	22,522	**51.5**
All Older 75+	20,800	32,200	11,400	**54.8**	20,693	32,315	11,622	**56.2**
All Older 85+	6,100	10,300	4,200	**68.9**	6,012	10,808	4,796	**79.8**

7.11 According to 2014-based household projections, the number of households led by individuals aged 60 and above is expected to increase by 28,498 (a growth of 67.0%) from 2018 to 2036.

7.12 Currently, Enfield has approximately 3,556 units of specialised housing designed for older individuals, comprising 1,345 units classified under residential care (C2 use class) and 2,211 units categorised as specialised accommodation for older persons (C3 use class). With the ageing population, there is an anticipated rise in the demand for specialised accommodation for older individuals. An analysis has been conducted

[18] Source: ONS 2016-based subnational population projections, GLA 2016 population projections (housing led)

using both the 2016-based ONS and 2016-based GLA projections. Depending on the population scenario considered, the overall 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 specialised accommodation for older individuals (C3 use class) is expected to grow to a range of 1,212 to 1,242 units.

People with disabilities

7.13 To determine the overall extent of disability and support needs in Enfield borough, a variety of sources can be utilised. The LHNA analysis explores the potential requirement for specialised accommodation for different groups based on available data, while also pinpointing areas where understanding may be lacking.

7.14 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.

7.15 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. This evidence provides a broader context for addressing the needs of older individuals, people with disabilities, and specific groups with unique requirements. Whilst existing homes can sometimes be adapted to accommodate wheelchair users, new homes should be designed to be wheelchair accessible where possible. As set out in the London Plan, at least 10% of new dwelling should be wheelchair accessible across a mix of types and tenures.

Community-led housing[19]

7.16 The NPPF sets out the government's ambition to facilitate more opportunities for individuals to construct their own homes, making this housing option more mainstream. In line with 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 expressing interest in purchasing serviced plots. Enfield currently maintains a Local Self-build Register, which is open for individuals and community groups interested in constructing their own homes. Presently, there are 225 individuals and 3 community groups registered for self/custom build. Registration does not require a local connection test or any associated fees.

7.17 Community-led housing is a growing sector in London, driven both by Community Groups with the support of the Mayor of London (Community Led Housing Hub) and locally in Enfield, such as Naked House. Community-led housing can manifest in various forms, including housing cooperatives, Community Land Trusts (CLTs), co-housing, and self/custom build housing. These approaches are not mutually exclusive, and often a combination of methods is employed to accommodate specific circumstances. This type of development underscores our dedication to meeting demand within the borough, and we will continue to monitor our register in compliance with statutory requirements.

7.18 Community-led housing can offer a more affordable path to homeownership, fostering more cohesive communities and enabling the exploration of specific uses,

[19] Formerly self/custom build

as exemplified by Older Woman's Housing Cooperatives in Barnet. In Enfield, there is a discernible demand to go beyond what the market or the council can provide in terms of housing affordability and typology.

7.19 Community-led housing, self-build, and custom build housing units contribute to the overall housing supply and expand housing choices. Consequently, they will be considered as part of housing policy implementation.

7.20 Therefore, our draft affordable housing policy supports the delivery of this type of housing as part of the affordable housing provision if it meets the definition of genuinely affordable housing outlined in the London Housing Strategy and is deemed genuinely affordable. Enfield also continues to maintain a statutory self-build housing register to further support self builders in the area.

Traveller accommodation

7.21 Gypsies and Travellers are a part of the diverse community in the borough and have specific housing requirements. To proactively plan and address their housing needs, a separate Gypsy and Traveller Local Plan is currently in preparation. This plan will be informed by Enfield's Gypsy and Traveller's Accommodation Assessment (GTAA) from 2020, which has identified a requirement for 21 pitches throughout the plan period.

Appendix A: Enfield Local Plan - Housing Strategy and Delivery

<u>Narrative</u>

London Plan and the NPPF

The London Plan, published in March 2021, provides a housing target for each of the London Boroughs from 2019 to 2029[1]. Enfield Borough's specific target is set at 12,460 dwellings, equivalent to an annual average of 1,246 dwellings over the 10-year period.

The London Plan (para 4.1.11) states that:

"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."

The NPPF requires strategic policies in Local Plans to cover a period of at least 15-years from their date of adoption. To ensure compliance with the NPPF, the emerging Enfield Local Plan extends its plan period to 2041. Consequently, there is a need to consider a housing target for the period post 2029.

Enfield Council acknowledges the likelihood of a forthcoming review of the London Plan preceding the adoption of the emerging Local Plan. While the emerging Enfield Local Plan cannot second guess the London Plan's new strategy and content, it is pertinent that the Inspectors that presided over the previous London Plan examination process were critical of its failure to fully address London's housing needs. Indeed, they even gave consideration to pausing the examination to allow further work to be undertaken to address the housing shortfall. The Inspectors' Report observing that it was "*…difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East'*. The Inspectors decided that this process would be time consuming, too much time in their view, which in their perspective would hinder the publication of other critical strategic policies.

In terms of the next London Plan, it is important to recognise that whatever approach or strategy is adopted, it will be many years before that strategy would be capable of being implemented on the ground in Enfield. This process involves several years for the development of a new London Plan, followed by additional years for the preparation, examination, and publication of a new London Plan, followed by a few more years for the preparation, examination and adoption of a new Enfield Local Plan, and yet a few more years again before new sites receive planning consent and developments can commence.

Considering these aspects collectively, they provide strong justification for the currently emerging Enfield Local Plan to take a proactive approach to addressing London's housing

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[1] The London Plan period

requirements. This pertains not only to the quantity of housing, but also the housing mix and the pressing need for more affordable housing.

Enfield Council Priorities

One of the Enfield Council Plan's[2] five key priorities is to deliver more and better homes. Indeed, right from the early stages of formulating the Enfield Local Plan, the Council set out the commitment to deliver a sufficient supply of new housing to address the Borough's needs, with a specific priority on affordable family homes (as articulated in paragraph 1.11.2 of the Regulation 18 Issues and Options document, December 2018)[3].

To better appreciate the Enfield Local Plan's crucial role in this context, it can be better understood by analysing the recent data on completions. Since the start of the London Plan period (2019/20) up to 2021/22, Enfield Borough has seen the delivery of 2,121 new homes. This number of completions falls well below the London Plan's annual target of 1,246 new homes per annum. Equally significant is the mix of these new homes delivered, with nearly 75% being heavily skewed towards one or two-bedroom properties.

In contrast, the Enfield Local Housing Needs Assessment (LHNA)[4] modelling indicates that the largest requirement is for three and four-bedroom properties, accounting for over 60% of the new homes to be delivered).

In relation to affordable housing, the Local Housing Needs Assessment (LHNA) suggests a need for more than 700 social or affordable rented homes per annum in the Borough, as well as an additional need for nearly 700 intermediate and affordable owned homes. Currently, there exists a substantial and widening gap between the delivery of affordable housing in the Borough and the estimated level of need. The Council recognises this as a priority, although it acknowledges that it will not be possible to meet the estimated need in full.

Housing Delivery and Targets in the Enfield Local Plan

During the first 10-years of the London Plan period (2019-2029), the Council's housing evidence demonstrates that the projected housing supply will facilitate the attainment of the London Plan targets for Enfield, which is set at 12,460 new homes from 2019-2029. This achievement is planned through use of a stepped trajectory.

While the housing target will be met in quantitative terms, when considering existing commitments, and the likely form of development on those sites expected to contribute towards delivery in the period to 2029, the levels of affordable housing and family housing[5] delivered, will fall significantly below the modelled need in the LHNA.

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[2] https://www.enfield.gov.uk/news-and-events/2023/06/investing-in-enfield-a-new-council-plan

[3] https://www.enfield.gov.uk/__data/assets/pdf_file/0023/12668/ELP-2039-Reg-18-for-consultation-Planning.pdf

[4] https://www.enfield.gov.uk/__data/assets/pdf_file/0025/5569/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf

[5] The reference to 'family housing' (or 'family homes') here and elsewhere in this note, aligns with the London Plan definition of 'family housing' – i.e., 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.

It is also the case that by simply meeting the London Plan's housing target for Enfield between 2019-2029 will not contribute to addressing the unmet need across London as a whole. Indeed, the London Plan Inspector Panel identified an unmet housing need of 13,000 dwellings per annum across London in the period 2019-2029.

Adjusting the mix of new homes delivered until 2029 is challenging due to a significant proportion of this development already having planning permission. Additionally, the urban nature of the forthcoming sites makes it unfeasible to increase the delivery of family housing and more affordable housing.

Looking beyond 2029, the starting point for setting Enfield's housing target is established in the London Plan paragraph 4.1.11, as detailed in paragraph 1.2 earlier. The London Strategic Housing Land Availability Assessment (SHLAA) from 2017, now six-years old, relied on a somewhat broad brush out of date and generalised density assumptions. Accordingly, for the Enfield Local Plan, the Council has opted to utilise more up to date local evidence of capacity. This information is set out in the Council's latest Housing and Economic Land Availability Assessment (HELAA)[6], which undergoes annual updates and summarised in the Housing Topic Paper (supplied as part of this note).

The assumptions used in the HELAA seek to make effective and efficient use of urban land, while also exploring opportunities for providing more family housing.

The HELAA also provides an updated assessment of the likely contribution of small sites to Enfield Borough's future housing supply. This assessment is based upon an analysis of historical local trends of evidence.

To arrive at an overall estimation of potential housing land supply from urban sites during the Plan period, the Council has used its Site Selection process and assumed phasing outlined in the HELAA. These figures are presented in Table 1 below, and they consider the delivery on small sites, as well as the possibility of some planning permissions to lapse.

Source	**2019-2029**	**2029-2041**
Completions	2,148	0
Allocations	8,109	14,114
Other deliverable Sites	1,558	0
Other developable Sites	408	613
Windfall	829	2,715
Estimated Lapses	-452	-483

[6] Provided under separate cover to Counsel. Can be released on 6-Dec as part of the pre-publication period or wait till publish Reg-19 on 7-Mar

Total	12,801	16,959

Table 1 – Local Plan Housing Supply (Urban Sites)

Analysis of the housing deliverable through the urban sites shows that the housing mix is likely to remain heavily skewed toward smaller one and two-bedroom properties, with limited scope for providing more family housing (three-bedrooms or more). Additionally, the analysis also shows that the level of affordable housing that would be deliverable would fall a long way short of addressing the local need identified in the LHNA.

Recognising the Council's commitment to increasing the supply of more affordable and family housing, and in light of the government's aim of significantly boosting the supply of homes, the Council has explored the available options for increasing the delivery of such housing. The council has prepared a number of iterative Housing Delivery Action Plans since 2019 considering options for addressing these shortfalls. The options set out in the local plan have also been assessed in the IIA against IIA Objective 3: Housing.

The Local Plan's Viability Assessment identified significant variations in viability across different geographical areas within the borough. Consequently, it suggested that an area-specific approach to housing tenure might be appropriate. The Enfield Whole Plan Viability Assessment from April 2021 revealed that greenfield land in more affluent areas of the borough is likely to support higher levels of affordable housing, potentially reaching up to 50%, as well as substantial developer contributions, amounting to at least £50,000 per unit, in addition to the existing Community Infrastructure Levy (CIL) rates. These findings indicate that affordable housing on greenfield land is not only more viable in quantitative terms but also forms a larger proportion of the overall housing offering compared to other parts of the borough. The Council is also mindful of the timing challenges mentioned in paragraph 1.5 above. If the emerging Enfield Local Plan doesn't properly grapple with the housing issues now, there may not be another opportunity to address matters them in a future Local Plan review for many years, leading to a worsening gap between housing delivery and need.

Given the physical and viability constraints on many urban sites within Enfield Borough and the importance of protecting employment land to meet current and future need, while sustaining economic prosperity, this is considered the only realistic option for increasing the delivery of affordable and family housing is to consider sites within the Green Belt.

Two primary opportunities exists within the Green Belt have been identified at Crews Hill and Chase Park. Crews Hill has an existing under-utilised railway station and significant areas of previously developed land, offering an opportunity for creating a sustainable new settlement. Chase Park is in close proximity to existing public transport services and provides an opportunity for delivering a sustainable urban extension that can help address infrastructure deficiencies in the immediate surrounding area. Both areas are capable of boosting significantly the supply of homes to meet the Borough's needs, particularly in terms of family housing and affordable housing.

The implications of releasing land from the Green Belt for development have been carefully evaluated through an Integrated Impact Assessment (IIA)[7]. The Council believes that there are the necessary exceptional circumstances to justify the release of the required land from the Green Belt to accommodate the planned development at Crews Hill and Chase Park.

Presented in Table 2 below is the overall housing supply within the Local Plan, as set out in more detail in the Housing Topic Paper, including both the urban sites and proposed Green Belt sites.

Source	**2019-2029**	**2029-2041**
Completions	2,148	0
Allocations	8,309	19,065
Other deliverable Sites	1,558	0
Other developable Sites	408	613
Windfall	829	2,715
Estimated Lapses	-452	-483
Total	12,801	21,910

Table 2 – Local Plan Housing Supply (Urban Sites and Green Belt Sites)

The allocation of Crews Hill and Chase Park makes a material difference to the number of new affordable and family sized homes delivered in Enfield throughout the period to 2041 and beyond.

Without Crews Hill and Chase Park, the housing topic paper estimated that approximately 470 new affordable homes will be delivered on average, per annum, over the Plan period. With Crews Hill and Chase Park on stream, an additional approximately 250 affordable homes will be delivered on average, per annum, from 2029 to 2041.

In terms of the housing mix, Crews Hill and Chase Park will also make a significant contribution to the delivery of family housing, with approximately 60% of the new homes built across these areas being in the form of family homes. The Housing Topic Paper estimates that the addition of Crews Hill and Chase Park to the allocations in the plan, and taking account of completions and windfall estimates, could have the effect of increasing the overall supply of family housing in the plan from by around 3,600 homes from 8,600 (30% of the total) to 12,200 (35% of the total), all things being equal. This remains far below the target

[7] Will be available around 25-November.

mix of 60%, but these sites would make an important contribution to meeting the target mix set out in the LHNA.

Equally important, the inclusion of Crews Hill and Chase Park increases the total housing land supply within the Local Plan to approximately 34,710 new homes over the plan period. This broadly aligns with the housing figure for Enfield Borough, derived from the London Plan requirement for the period 2019 to 2029. It also addresses the requirement from 2029 to 2041, which aims to address Enfield's share of the London-wide housing need for that period, while also accounting for a supply versus need gap allowance, a figure estimated to be 34,500 new homes.

In terms of the housing target figures to be incorporated into the Local Plan, the London Plan target will be used for the period 2019 to 2029 (i.e., 12,460 homes). A significant 'step' is proposed towards the end of this period, to ensure that the backlog from the earlier years of the Plan period is addressed. In the period from 2029 to 2041, it is proposed to set the housing target 5% below the estimated housing land supply figure for that duration (i.e., a target of 1,735 homes per annum). This approach allows for some flexibility to accommodate potential delays in delivery, while encouraging as much capacity as possible to come forward to help meet local housing needs, London's housing needs, and contributing to the government's overarching national objective to boost significantly the supply of housing.

Consequently, the overall housing target for the Local Plan period 2019 to 2041 would be 33,280 homes.