



EDMONTON LEESIDE AREA ACTION PLAN

EXAMINATION

FINAL

Hearing Position Statement

Matter 3: Housing

Issue: Whether the policies in the Plan are consistent with the aim of providing the supply of housing required to meet the needs of present and future generations.

i. Is the level of housing development which is proposed in the AAP justified and based on sound evidence? Is it consistent with local and national policy?

The development of a significant quantum of housing within the Edmonton Leaside AAP area, to be delivered at Meridian Water, was established through Enfield's adopted Core Strategy which references 5,000 new homes.

Regeneration to delivery homes at Meridian Water is consistent with the London Plan which has, over numerous iterations, seen the Upper Lee Valley Opportunity Area as an important component to increasing London's housing supply. The new Draft London Plan (2017) continues this approach with Policy SD1 expecting boroughs to use Development Plans (such as the ELAAP) to '*set out how they will encourage and deliver the growth potential of Opportunity Areas*' and '*support development which creates employment opportunities and housing choice for Londoners*'.

The Mayor of London has recognised the importance of housing provision at Meridian Water through the awarding of Housing Zone Funding.

Enfield has seen a steadily rising need for new homes as the population has continued to increase far above the levels previously forecast. This is clearly illustrated through the London Plan targets: rising from 395 per annum to 560 in 2011, to 798 in 2015, and 1,876 in the Draft London Plan (2017) – a target increase of 475% in under ten years.

The NPPF (2012) requires the Council to identify a supply of sites for housing; the ELAAP is a key part of the process to enable Meridian Water to deliver the housing required for Enfield to fulfil its requirements.

A detailed evidence base has been prepared for the Edmonton Leaside AAP to ensure the Council is targeting an optimum and achievable number of homes at Meridian Water. The supporting documents '*Evidence on Housing and Supporting Infrastructure*' and '*Scenario Testing*' set out the assessment and modelling, including the testing across a range of potential development levels. This

evidence shows that 10,000 new homes could be achieved at Meridian Water, subject to the mix and tenure, provision of supporting infrastructure, de-designation of SIL land, and high quality urban design – and is used to inform Policy EL1.

ii. Is the proportion of affordable housing proposed consistent with other local and national planning policy? What justification is given for any departure from it?

The NPPF requires local planning authorities to meet their assessed need for affordable housing, leaving the Local Plan to establish what figure this should be.

Enfield's Local Plan requires 40% affordable housing, as set out in the Core Strategy (2010) and Development Management Document (2014). This requirement is reflected through ELAAP Policy EL1 that 40% affordable housing should be achieved across the Meridian Water development as a whole.

While the London Plan (2016) does not establish a specific percentage for affordable housing, the draft London Plan (2017) sets out a threshold approach for affordable housing of 35%. ELAAP Policy EL1 is consistent with the draft London Plan approach through expecting development proposals to deliver a minimum of 35% affordable housing. Development proposals below the Council's 40% requirement may therefore be acceptable if a low viability level can be demonstrated during the early stages of Meridian Water.

iii. Is the housing mix consistent with other local and national planning policy? What justification is given for any departure from it?

The NPPF requires local planning authorities to base their housing mix requirements on evidence base, leaving the Local Plan to establish the mix figures.

The London Plan does not set a figure for housing mix and expects developments to offer a range of housing choices in terms of the mix of housing sizes, with regard to the need and demand identified by the London SHMA. The draft London Plan (2017) Table 4.3 provides SHMA findings that 3+ bed units should comprise 29% of the total.

Enfield's Core Strategy set a policy approach of 60% 3+ bed units for social rented housing and 65% 3+ bed units for market housing. More recent evidence from Enfield's SHMA (2015) shows a lower requirement for 3+ bed housing at 50% of the total.

The ELAAP Policy EL1 seeks to ensure the housing mix provided at Meridian Water is appropriate in terms of delivering a balanced community and high-quality family housing. The evidence base modelling work showed getting the right housing mix is important to achieving a higher quantum of homes. The policy therefore requires at the very least a minimum of 25% 3+ bed housing in the initial phases of Meridian Water. This proportion is expected to rise as viability and a developing sense of place makes the location more desirable for families.

In summary, Policy EL1 does allow lower levels of 3+ bed homes than the Core Strategy, an approach which should be viewed in light of more recent evidence base for Enfield and the draft London Plan supporting a higher proportion of 1 and 2 bed units. Proposals must explore delivery above the minimum 25% 3+ bed units, and it is expected that a higher proportion of large units will be achieved as viability improves at Meridian Water.

iv. Is the scale of housing proposed deliverable over the plan-period? Does it take a reasonable account of lead-in times and site assembly? What key assumptions have informed the housing trajectory and how does the AAP seek to de-risk delivery to ensure the proposed number of homes are built?

Housing at Meridian Water will be built out over a period of approximately 20 years, with the long timeframe reflecting the scale and complexity of the site. Phase 1, which covers the western end of the site and the new Meridian Water Station, has been granted permission for 725 homes.

The Council has committed considerable financial resources to supporting Meridian Water through a programme of land purchases, and now owns approximately 65% of the Meridian Water site. The Council continues to pursue further land purchases with the aim of de-risking development through control of land ownership. Where land is owned by another party the Council is involved in discussions regarding development as part of the Meridian Water project.

The Council is required to prepare an annual Housing Trajectory. The Trajectory has a timeframe of 15 years, and Meridian Water provides a substantial proportion of the borough's units, particularly in years 5 to 15. Meridian Water is therefore critical to the Council achieving its housing requirements over the medium to long-term.

The project at Meridian Water, like all major regeneration schemes, faces risks to its timely and effective delivery. The Edmonton Leaside AAP will play a key role in providing the certainty that the project needs to succeed through establishing the planning framework to support and guide development.

v. Does the proposed scale of new homes strike the right balance between being aspirational but realistic (NPPF, paragraph 154)?

Enfield's population has risen rapidly in recent years, driving the huge increase in the borough's housing target, as discussed in item (i) above. Meridian Water will provide a significant part of Enfield's future housing supply. The ELAAP is therefore focused on achieving a high quantum of housing while balancing this with other critical elements to providing a functioning, liveable neighbourhood, including high design standards and all the necessary supporting infrastructure such as schools and amenity space.

To ensure that the ELAAP achieves an optimum and achievable number of homes at Meridian Water the Council prepared a detailed evidence base, as per the supporting documents '*Evidence on Housing and Supporting Infrastructure*' and '*Scenario Testing*'. These documents set out the assessment and modelling, including testing across a range of potential development levels. This evidence shows that 10,000 new homes could be achieved at Meridian Water, subject to the mix and tenure, provision of supporting infrastructure, de-designation of industrial land, and high quality urban design. Public transport levels will need to increase to support development, and the current construction of Meridian Water Station and the third track (scheduled to be operational Spring 2019) are the early components in enabling this change.

The ELAAP establishes an approach at Meridian Water which conforms with that of the Mayor's draft London Plan (2017). Policy GG2 supports creating high-density, mixed-use places that prioritise the development of Opportunity Areas, on sites which are well-connected by existing or planned rail stations.

The NPPF paragraph 154 expects Local Plan documents to address the spatial implications of economic, social and environmental change. The AAP does this through providing a framework for decision-making at the Meridian Water site which will undergo transformational changes in terms of housing, community, jobs and the physical environment.

vi. Given the significance of the number of new homes proposed to the Borough's growth requirements, what are the potential contingencies should development not proceed as envisaged?

As discussed in item (i) above, Enfield's housing targets have increased hugely in recent years as the borough's population has risen rapidly. Meridian Water is Enfield's largest development and will therefore provide a substantial proportion of the borough's housing supply over the next 20 years. As such Meridian Water would be very difficult to replace as a housing site.

Enfield is currently preparing its new Local Plan and is analysing how growth can be accommodated within suitable locations; delivery of homes at Meridian Water plays a significant part in providing for the borough's planned housing requirements.

vii. Would the wording proposed in policy EL1 be an effective means of achieving the aims and objectives of the Plan?

Objective 1 of the ELAAP sets out the need to build a sustainable urban neighbourhood through the delivery of thousands of new homes in Meridian Water and to ensure a diversity in the type, size and tenure of housing. Policy EL1 provides the policy support to achieve this objective.

The potential number of new homes achievable at Meridian Water is established by Policy EL1, with the evidence showing 10,000 units is achievable, subject to the factors listed, including release of designated industrial land for mixed uses and sufficient supporting infrastructure. The policy therefore allows for housing growth above that set out in the Core Strategy, established through the evidence base as referenced in the supporting text.

Policy EL1 supports a mix of tenures and types of housing: the approach to affordable housing needs is discussed in item (ii) above and the policy position on housing mix in item (iii) above. There will be an amendment to clarify Part A of the policy as follows:

All residential development proposals at Meridian Water will be expected to achieve a minimum of 35% affordable housing, ~~measured as a proportion of the total number of units, or in part based upon the proportion of habitable rooms.~~