



Enfield Local Plan (Regulation 24) 2024

LBE's response to IN7

E7.10: Housing Requirement

31 March 2025

Rationale for update

1. As discussed during Matter 2 of the Stage 1 Hearings and confirmed in the Inspector's IN7 letter, the Council is required to produce a revised version of Table 2.2 in the Enfield Local plan (ELP), setting out any proposed changes to the housing requirement and its components. At this stage, an interim version of the revised table is included in the updated Document E6.1 (Suggested Main Modifications Schedule). IN7 specifically states:

As discussed under Matter 2, the Council will need to produce a revised version of Table 2.2, setting out any changes proposed to the housing requirement and its components. This should be included in the updated Document E6 (Suggested Main Modifications Schedule). The Council should also set out any other consequential modifications that would result from this change including, for example, Figure 2.5 and other supporting text.

2. Alongside Appendices 1 and 2, which update Table 2.2 and Figure 2.5 respectively, this briefing note sets out the rationale for the update, the methodology applied and the policy implications. No other modifications to the Plan are proposed at this time, aside from the update to Figure 2.5.
3. This paper provides evidence on the current supply position in the plan based on the latest available evidence, as well as to provide the Inspector with an opportunity to consider the updated position, and any implications in light of wider issues such as conformity with the London Plan. Caution is required however, as the proposed supply and requirement figures are based on officers' judgement at this stage, and have not been subject to consultation with the development sector in Enfield. Therefore further updates will be required following the completion of the 2024/25 annual monitoring data, expected in Summer 2025, and following further detailed evidence base work on major masterplanning schemes which is currently underway. The proposed modifications are provided in draft form only, and should not be considered to reflect the council's final position on these matters.

Methodology

4. The housing requirement set out in the Regulation 19 Enfield Local Plan is based on the target set out in Table 4.1 of the London Plan 2021 for the period 2019 to 2029. For the period 2029 to 2041, the target is informed by the Council's interpretation of Paragraph 4.1.11 of the London Plan, which allows for the setting of capacity-based targets using identified housing sites. This capacity was determined using data on housing supply and pipeline permissions with a base date of 1 April 2022.
5. Since then, two monitoring years (2022/23 and 2023/24) have elapsed, and updated data on completed homes and permitted schemes is now available as of the new base date of 1 April 2024. The Council submitted this site supply data already to the Inspector as part of its response to PQ24 (E3) and under PQ38 in relation to small site windfall figures in November 2024. The figures included in this update incorporate that data and adjust the phasing of non-consented schemes to reflect the latest information available.
6. Further data for the 2024/25 monitoring year will also shortly become available in Summer 2025, providing additional updates to the Council's factual land supply position. This will reflect new permissions, lapses, and revised phasing based on the latest information around site preparation, construction timelines, and particularly the progress of large, multi-phase developments. Therefore, caution is required in drawing any firm

conclusions from these interim draft proposed main modifications, and they are provided to the Inspector for information only and without prejudice, as they are subject to change.

7. As set out in the Council's response to PQ24 [E3, paragraph 46], the updated figures must also account for a delivery backlog of 2,500 homes between 2019 and 2024. This represents an increase from 1,590 home backlog acknowledged in the submitted Plan. The Council proposes to address this shortfall by spreading the backlog across the remainder of the plan period to 2041, beyond the first five years. The update has been prepared using the Council's established annual monitoring process. This involves extracting newly consented schemes from the Council's planning database, cross checking data on commencements and completions, and ensuring quality assurance through the Greater London Authority before submitted statutory returns to government.
8. A final stage of reconciliation and validation is then undertaken. This includes reviewing all outstanding extant permissions to ensure the identified capacity remains accurate. It also accounts for re-permitted schemes, Section 73 Variations, permission lapses, and any known changes to development Intension. Where relevant, insights from internal council services or pre-application discussions have also been incorporated to ensure the most realistic picture of site delivery is captured. The council has not yet undertaken detailed engagement with site promoters in relation to the proposed phasing of sites however, and therefore caution is required given the market circumstances described below.

Policy Implications

9. At the point of submission, the Council's housing requirement was 33,280 homes, comprising the London Plan target to 2029, and a capacity-based target thereafter in line with Paragraph 4.1.11 of the London Plan. This was informed by the 2022 monitoring data, which was frozen ahead of submission to form the basis of the plan's evidence. The accompanying housing trajectory indicated a reasonable prospect of delivering 11,192 homes, between April 2022 and April 2029, and 12,460 homes in between 2019 and 2029, based on phasing assumptions prepared by officers in consultation with developers. These assumptions were reflected in Table 2.2 of the Submission Draft ELP, which included an uplift in annual delivery of 2,091 homes per year in between 2027 and 2029 to ensure the London Plan target was met without delay.

London-wide delivery challenges

10. With two additional years of monitoring data now available, and taking into account progress on major schemes in Enfield, the Council no longer considers the previously identified housing requirement, specifically the delivery of 12,460 homes between 2019 and 2029 to be achievable. A key factor has been the impact of evolving building safety regulations, particularly the new second staircase requirement for tall buildings, which has delayed several large, consented schemes. The table below lists a number of schemes comprising more than 1,500 homes across a number of sites with detailed planning permission are now expected to require re-consenting, significantly affecting their delivery timescales.
11. In addition, the Colosseum Retail Park scheme, which has capacity for over 1,500 homes (including more than 400 homes with detailed planning consent) has lapsed due to viability concerns. These external constraints, including regulatory changes and market viability, have materially affected the borough's short term land supply and its ability to meet the London Plan housing requirement by 2029.

Table 1: Examples of consented site allocations expected to require significant variations to planning permissions to accommodate new fire safety regulations

Site allocation	Planning Reference	Name	No. of homes
SA5.1	21/04742/FUL	Meridian Water Phase 1b	676
SA6.1	19/01941/FUL	Southgate Office Village	216
SA7.1	20/04193/FUL	New Southgate Gas Holder	182
SA URB.02	21/02517/FUL	Cockfosters Station Car Park	351
SA URB.09	21/02076/OUT	Exeter Road Estate	129

12. The Council also notes that the average housing delivery across London during this period has been 66% (172,000 homes)¹ of the 261,000 required by London Plan over five years. In comparison, Enfield has delivered 61% or 3,801 homes out of a required 6,230. The majority of London boroughs, regardless of the status of their Local Plans, are experiencing similar supply challenges in meeting their London Plan housing targets. This broader shift in delivery conditions has been acknowledged in the Government's [London Plan Review](#), which, using earlier data concluded:

“Four years into the plan period, net housing additions in London are averaging consistently less than 38,000 and has cumulatively fallen short by around 60,000 homes, with only four Boroughs seeing supply at or in excess of their ten-year target.”

13. The Review identified a range of factors contributing to this shortfall, including macro-economic conditions, fire safety regulations, infrastructure constraints, delays with statutory consultees, viability challenges and pressures on planning resources. These issues are not unique to Enfield but are part of a wider slowdown across London and nationally. This trend is reflected in the latest national housing pipeline report by the Home Builders Federation, which found that the number of homes granted planning permission in England in the year to December 2023 fell to the lowest level for any 12-month period since 2014. Just 233,000 homes were approved nationally in 2023, a decrease of 20% on 2022, 27% on 2021, and 30% below pre-pandemic levels, highlighting declining market confidence and worsening conditions for housing delivery.

¹ https://data.london.gov.uk/dataset/residential-completions-dashboard?_gl=1%2a1hwbif3%2a_ga_PY4SWZN1RJ%2aMTY2NjM2MTEzOS4xLjAuMTY2NjM2MTI0NC42MC4wLjA.

14. Whilst the Council has attempted to consider the impacts of these wider changes on its housing trajectory, there remains considerable uncertainty in the delivery environment, and further engagement with the development sector is required to validate these interim proposed modifications. Therefore, these figures will be kept under review and will likely also require updates in light of any Stage 2 hearings should these address individual site delivery trajectories.

Implications for housing requirement before 2029

15. Even so, in light of revised site development timelines, the Council no longer considers the delivery of 12,460 homes by 2029 to be a realistic prospect. As outlined above, significant changes in site trajectories have already affected delivery over the three monitoring years since the April 2022 base date used in preparing the Local Plan. These conditions are unlikely to improve significantly in the four years between April 2025 and April 2029—particularly given the need to address the growing backlog in delivery from 2019 onwards, much of which was impacted by COVID-19-related delays.
16. Post-pandemic, the housing market continues to experience adverse conditions driven by global economic pressures, including hyperinflation in the construction supply chain, reduced demand, and policy changes such as increased interest rates. These factors have cumulatively impacted delivery and mean that the current version of the Local Plan is not deliverable as drafted, and therefore requires modification to establish a more realistic and achievable housing supply trajectory.
17. To ensure the plan is sound, the revised housing requirement must be reflected in Policy SS1 Table 2.2, covering both the period to 2029 and beyond. The Council considers that it has taken all reasonable steps to meet the London Plan targets. However, delivery assumptions made at the time of submission have since been overtaken by evolving market conditions, regulatory changes, and a shifting policy and financial environment.
18. The Council is therefore proposing a lower housing target for the period 2019–2029, to be examined through the Local Plan process. This revised target takes into account prevailing market sentiment and includes a 20% buffer, enabling the Council to demonstrate a five-year housing land supply at the point of adoption, in line with the National Planning Policy Framework. Overall, the Council believes that approximately 75% of the London Plan housing requirement can be delivered by 2029, with the remaining shortfall to be addressed over the remainder of the plan period using the Liverpool method. The trajectory to 2029 is based on schemes with extant planning permissions that have a reasonable prospect of delivery within four years from April 2025, alongside a proportion of windfall development, in accordance with London Plan Policy H2 and the National Planning Practice Guidance.
19. Accordingly, the Council requests that the Inspector consider main modifications to establish an updated housing requirement of 927 dwellings per annum for the period April 2025 to April 2029. While the Council anticipates that actual delivery may exceed this figure by approximately 20%, adopting this lower baseline will provide the required buffer under the Housing Delivery Test, which is unlikely to improve significantly in the short term. The revised figure better reflects Enfield's current delivery performance and incorporates a modest uplift from key brownfield regeneration schemes expected to come forward in the near term. These adjustments will help ensure that the Enfield Local Plan remains deliverable as a whole.

Implications for housing requirement after 2029

20. The Enfield Local Plan proposes ambitious Green Belt releases to significantly increase housing delivery in the borough. These measures are essential as, without them, Enfield would be unable to meet either the London Plan targets or the Government's Standard Methodology, which is expected to inform the next iteration of the London Plan.
21. The Council is therefore seeking to set a post-2029 housing requirement of 2,071 homes per annum for the 12-year period from April 2029 to April 2041. This higher target, up from 1,735 at submission reflects the Council's interpretation of London Plan paragraph 4.1.11, in that it is based on the capacity of identified sites within the Plan. It also:
- Addresses the backlog in delivery expected to accrue by 2029,
 - Reflects the scale of proposed urban extensions on Green Belt land, and
 - Maintains a consistent approach to the 4.1.11 methodology as established at submission.
22. Interim updated phasing assumptions for large sites including Meridian Water and Crews Hill and Chase Park suggest that these schemes will no longer deliver the quantum of homes previously projected earlier in the plan period. For example, the previous housing trajectory at submission showed the council exceeding 2,000 dwellings per annum from the 2027/28 monitoring year, with delivery peaking in 2031/32. These interim revised estimates show that the 2,000 dwellings per annum will not now be delivered until 2029/30, with a peak slightly later, in 2032/33. With large schemes like Meridian Water, evidence still suggests that, even condensing delivery trajectories to ensure that schemes are delivered by the end of the plan period, build out rates remain realistic and achievable. However, the proposed modifications are interim figures as further engagement work is required with the development sector in the lead up to potential Stage 2 hearings to understand the precise impacts of the market conditions described above on delivery trajectories. The Council's regeneration team have also commissioned a comprehensive review of Meridian Water to report in the summer.
23. Furthermore, as stated in E3 LBE Response to IN1, the Council is also proposing to update the allowance it makes for windfall delivery. With five years of historic trend data now available on small site delivery in Enfield since the publication of the London Plan, the Council can now confirm that the 353 dwelling per annum small sites windfall allowance set out in the London Plan (less any identified schemes on small sites) is supported by recent evidence of delivery. This is included from Year 3 of the plan and contributes to the five-year land supply calculation. At submission, the proposed windfall allowance was therefore 3,544 homes. The updated figures, which cover 15 rather than 17 years of windfall, is 4,011, excluding identified schemes on small sites to avoid double counting as at submission. This represents an uplift of 13% overall, or 28% on an annualised basis, to account for new monitoring data in relation to small sites, and this will also support the council to meet delivery later in the plan period. There are further uplifts associated with additional capacity identified on existing sites, which addresses the gap created in supply as a result of the lapse of the Colosseum retail park scheme. Overall the council is confident that this does not impact upon the plan's spatial strategy.
24. There has been no change to the way the Council calculates capacity under paragraph 4.1.11; the Green Belt sites remain included as submitted. Further detail on how this capacity-led approach continues to meet the requirements for general conformity with the London Plan is provided in the following section.

Policy implications: General conformity with the London Plan and strategic alignment

25. While the updated housing trajectory proposes a lower delivery rate to 2029 than originally anticipated, the Enfield Local Plan remains in general conformity with the London Plan, as demonstrated in the Council's response to PQ5 (Appendix 2) and the Statement of Common Ground with the GLA. The revised trajectory is consistent with paragraph 4.1.11 of the London Plan, takes account of updated monitoring and deliverability evidence, and does not result in significant harm to the implementation of the London Plan's strategic objectives at this stage in its interim form.
26. The Enfield Local Plan continues to support the London Plan's Good Growth objectives, including:
- Brownfield intensification, particularly at Meridian Water and Edmonton Green;
 - Investment in regeneration and infrastructure;
 - Long-term housing growth through Green Belt release post-2029.
27. As clarified in the General Conformity Topic Paper (E3.2), "General conformity does not mean that a local plan must be identical to or literally comply with the London Plan. Rather, it must not cause significant harm to its implementation." The London Plan's housing targets are based on the 2017 London SHLAA, which identified a package of sites that remain capable of coming forward through the Enfield Local Plan. The Plan imposes no barriers to their delivery, enabling continued alignment with the spatial strategy of the London Plan beyond 2029.
28. The proposed post-2029 uplift to 2,071 dwellings per annum directly supports the London Plan's longer-term ambition to address the city-wide housing shortfall and respond to the Government's emerging Standard Methodology, which will inform the next iteration of the London Plan. This approach reflects a balance between short-term realism and long-term ambition, ensuring alignment with the capital's broader housing strategy over the full plan period.
29. The GLA has previously acknowledged that borough-specific trajectories and capacity-led planning post-2029 are consistent with paragraph 4.1.11. They also recognise that short-term under-delivery is a widespread issue across London. Enfield's revised target to 2029 is based on robust, site-specific delivery evidence and does not undermine strategic objectives such as regeneration, brownfield optimisation, or infrastructure-led growth.
30. The Enfield Local Plan continues to provide a strong, plan-led response to priorities around housing, employment, infrastructure, and the environment, and the proposed adjustments to Policy SS1 reflect changes in delivery conditions rather than a departure from the Plan's overall strategy. The Plan remains aligned with the London Plan in key areas, including:
- Intensification of brownfield sites (e.g. Meridian Water, Edmonton Green);
 - Support for Opportunity Areas and growth corridors (e.g. New Southgate, the Upper Lea Valley);
 - Delivery of strategic transport improvements, particularly along key rail corridors;

- Strengthening of affordable housing provision and town centre renewal in places such as Enfield Town and Edmonton Green.

31. In summary, the interim revised housing trajectory supports the ongoing implementation of the London Plan's objectives while adapting to changing delivery conditions, and the Enfield Local Plan remains in general conformity with both the letter and spirit of the London Plan. However, the council is already beginning work to provide another year of monitoring data to provide further updates to the supply position, alongside substantive masterplanning and delivery analysis of major schemes in which it has an interest to provide more robust evidence on site phasing.

Conclusion and next steps

32. The Council recognises that these and future changes to the housing trajectory may have implications for other areas of the evidence base, including transport modelling, recreational mitigation, and infrastructure planning and delivery. At this stage, the Council does not consider that the updated delivery figures will materially impact these areas. However, this position will be kept under review, particularly following further updates to the housing trajectory in late 2025, and in light of wider changes in the economic and housing delivery environment. These may ultimately require a greater proportion of development currently allocated in the Plan to come forward beyond 2041.

33. In parallel, the Council is progressing detailed delivery and phasing work for key strategic sites including Crews Hill, Chase Park, and Meridian Water. This work will inform future updates to the Council's land supply position. The Council also intends to work closely with the development sector and individual site promoters as part of upcoming Statements of Common Ground, to ensure that the trajectory and site phasing assumptions are realistic, robust, and up to date.

34. While the draft main modifications set out in the appendices propose a lower delivery rate to 2029 to reflect current market constraints and site-specific delivery challenges, the Enfield Local Plan continues to remain in general conformity with the London Plan. The revised approach reflects up-to-date monitoring and evidence, and the Council is taking proactive steps to accelerate delivery beyond 2029. The Plan continues to align with the London Plan's strategic objectives, promoting brownfield intensification, enabling regeneration and infrastructure investment, and delivering long-term housing growth through Green Belt release.

Appendix 1: Proposed amendments to ELP Policy SS1 Table 2.2 included in Document E6.1 Latest Schedule of Main Modifications

Table 2.1: Year by year Plan Targets

Period	Total dwellings	Dwellings per annum (average)
Completions 2019/20-2023/24	3,801	760 dwellings per annum
2024/25 to 2028/29:	4,633	927 dwellings per annum
2029/30 to 2040/41:	24,847	2,071 dwellings per annum
Total plan target	33,280	1,513 dwellings per annum

Appendix 2: Proposed amendments to ELP Policy SS1 Explanatory Text Figure 2.5 included in Document E6.1 Latest Schedule of Main Modifications

Figure 2.5: Housing trajectory

