

Enfield Local Plan Examination

Matter 2: Housing Need and Supply

Q2.1: Is the housing requirement of at least 33,280 homes by 2041 justified and positively prepared. In particular:

- a) What is the housing requirement up to 2029 and is this consistent with Policy H1 of the London Plan?**

The Council aims to provide 33,280 dwellings between this period – 2019 to 2041.

We note on page 21 that the Council's own assessment indicates that 31,000 new households may form, therefore a target of 33,280 net additional homes would support such an increase of households.

The London Plan sets a target for Enfield Council to provide 12,460 homes between 2019/20 and 2028/29, or an annual average of 1,246 dwellings per annum (dpa). It should be noted that this apportioned requirement is derived from an already capacity constrained target, as the assessed need for housing overall in London, based on the London Plan, is for 66,000 homes a year between 2019 and 2041. As paragraph 0.20 is the GLA SHMA 2017 summarises:

When backlog need, affordability and the likely rate of second and vacant homes are taken into account, the net requirement for new homes in London between 2016 and 2041 is estimated to be around 65,900 homes a year.

The proposed housing requirement for Enfield's Local Plan is justified in order to help close the gap in London's housing supply. The London Plan identifies a need for 66,000 homes per year, but is only able to identify capacity for 52,000 a year. Consequently, there is an unmet need of 14,000 homes a year. See paragraph 1.4.3 of the London Plan.

London also has a major problem with housing delivery. The London Plan targets are not being met. This is a major issue of concern for the Government and was the subject of the Government's recent published review of the London Plan: *London Plan Review: Report of Expert Advisers*, 15 January 2024. As a whole, London now needs to deliver 62,300 homes on average each year until 2028/29 if the full London Plan housing requirement is to be provided by the end of the plan period in 2028/29 (see para. 3 of the Executive Summary and para. 2.16). To achieve this target will require a significant additional buffer of planning permissions to accommodate undelivered or delayed schemes (see para.2.27).

There are additional problems which place the delivery of the 52,300 homes a year required by the London Plan.

First, local plan adoption is falling behind schedule. As the Government's review observed (*London Plan Review: Report of Expert Advisers*, 15 January 2024):

"Of the 52,300 per annum housing targets, there are currently adopted Local Plans based on the current London Plan in place for just 16,540 of that total. This lack of timely local policy must have a consequence for implementation of the London Plan's spatial strategy and achievement of its targets.

Second, of additional concern is the fall in approvals in recent years. According to the Government's review, there has been a precipitous reduction in the number of homes being approved, falling from over 89,000 in 2018/19 to 68,000 in 2021/22 and now down to 40,200 in 2022/23 (see paragraph 2.29).

Information from the GLA's data 'dashboard' of approvals, starts and completions in London since 2018/19 shows the following:

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Approvals	88771	71908	64663	70200	45840	40288
Starts	51715	48309	43443	42385	50758	29665
Completions	37128	32799	33037	38347	35019	32739

The most alarming figure is the fall in approvals – by over half – since 2018/19. Without a healthy pipeline of approvals feeding supply, completions will certainly fall further in future years.

For context, the London Plan target is for 52,300 dwellings a year. The unconstrained need is 66,000 homes a year.

More recently, the new Government has agreed a new approach to planning for housing needs and will introduce a mandatory Standard Method. The Statement of Common Ground agreed between the GLA and Enfield, November 2024, at paragraph 3.3 refers to this and observes that the housing requirement for London as a whole will increase to 80,693. Following the conclusion of the Government's consultation and the publication of the new NPPF, including the revised mandatory Standard Method, on 12 December 2024, the figure for London will increase to 87,992 net additional dwellings a year. As Enfield Council and the GLA observe, the effect of this is that Enfield's 'housing target is likely to increase than decrease' (para. 3.4).

A new London Plan is to be consulted upon during 2025. It is likely that a new London Plan will be adopted by 2027.

Also, as the GLA and Enfield Council observe in their Statement of Common Ground at paragraph 3.5, new national planning policy is more supportive of the release of Green Belt land to meet development needs, especially housing need.

b) What approach --has been used to calculate the housing requirement for the post 2029 period?

Where local plans extend beyond 2028/29 the London Plan advises in para. 4.1.11 that boroughs 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*".

Some London boroughs have rolled forward the annual average figure in the London Plan and applied this to every year of the plan post 2028/29. This has been found sound at various London local plan examination, and is an approach that is now expressly supported by the GLA. See paragraph 3.4 of the Statement of Common Ground between Enfield Council and the GLA. However, paragraph 4.1.11 of the London Plan, as the adopted development plan,

advises a different approach, quoted above, which draws upon evidence of capacity to define the housing requirement for the period post-dating the London Plan. This, however, is not an 'objective assessment' of housing need.

c) Is this approach consistent with the requirements of Policy H1 of the London Plan?

National planning policy at the time that the Enfield Local Plan was prepared (2021 version), requires that local authorities prepare local plans to run for at least 15-years from adoption (para. 22) and these should be informed by a local assessment of housing need using the standard method, unless exceptional circumstances justify an alternative approach. In the case of London, this assessment of need is undertaken by the GLA as part of the London Plan.

Since the Enfield Local Plan extends beyond 2028/29 – the end date of the London Plan, it is necessary for the Council to take into account the supporting text to Policy H1 of the London Plan. Although paragraph 4.1.11 is not policy, it explains how London boroughs should set a housing requirement for the period post-dating 2028/29. It requires local authorities to consider deliverable capacity. Enfield Council, therefore, based on this guidance made a decision about what it would need to do to address the requirements of both national policy, which requires plan makers to reflect the standard method, and to remain in conformity with the London Plan.

In its Housing Topic Paper, the Council considers various scenarios for assessment the need, while trying to 'square' London Plan policy with national policy. Paragraph 2.35 and 2.36 of the Housing Topic Paper explain the Council's conclusion for settling upon the figure of 33,280 dwellings for the period 2019 to 2041. This is based on paragraph 4.1.11 of the London Plan and reflects:

- A) Drawing on the GLA 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.

We consider that the Council has taken a sound approach that reflects the London Plan and endeavours to identify more deliverable land for housing to help address London's strategic housing shortfall that has now become an issue of acute concern. In August 2023 London Councils calculated that one in fifty households in London is technically homeless (see <https://www.londoncouncils.gov.uk/newsroom/2023/one-50-londoners-homeless-housing-disaster-unfolds-capital>)

This strategic shortfall in housing supply in London is an exceptional circumstance to justify the Council's approach and its planning strategy.

d) Consequently, is the overall housing requirement positively prepared and in general conformity with the London Plan?

The overall housing requirement is positively based, reflecting national policy (NPPF 2021) which refers to 'boosting significantly' the supply of homes, and London Plan policy H1, especially parts B and E, and paragraph 4.1.11 in terms of setting a housing requirement for the period after 2028/29.

Q2.2: Where is the “GLA guidance” referred to in paragraph 26 of the Conformity Topic Paper (and also paragraph 3.4 of the SoCG with the GLA) documented?

For the Council to respond.

Q2.3: How does this “guidance” effect the legal requirement for the Plan to be in general conformity with the London Plan?

This new guidance will have post-dated the preparation of the new Enfield Local Plan so it can only carry limited weight in the examination of this plan. However, it is welcome a statement of the Mayor’s preferred approach, and this will assist in the preparation of local plans that have yet to reflect the new London Plan.

In this case, the Council’s approach set out in paragraph 2.36, where it has identified other available capacity is a sound one. It is based on the guidance contained at paragraph 4.1.11 as well as policy H1. Moreover, policy H1 does not prohibit a London borough from allocating land in the green belt for development if that is deemed necessary to meet needs and maintain delivery.

It is also sound decision as a measure to address the strategic shortfall in housing supply in London. This has two aspects: a) the shortfall against need – 52,300 homes a year compared to the assessment of need for 66,000 a year; and b) the evidence of under-delivery across London as a whole which now requires 62,300 homes a year to be provided to achieve the London Plan target by 2028/29. Addressing this strategic undersupply represents a very significant challenge and it will require all sources of deliverable land for housing to be identified and allocated.

Q2.4: If the “interim measure”, referred to in paragraph 26 of the Conformity Topic Paper were adopted, what would the housing requirement be for the overall Plan period? How would this compare to that set out in Policy SS1?

Para. 26 of the Conformity Topic Paper states:

Further, the advice given by paragraph 4.1.11 in terms of how to set a housing target beyond the ten-year period addressed by Policy H1 and Table 4.1 is no longer consistent with the position of the GLA, which is that, as an interim measure, housing targets should as a minimum be rolled forwards from those in Table 4.1. In these circumstances, when testing the ELP’s strategy against the London Plan’s overall policy structure, any lack of conformity with paragraph 4.1.11 (again, assuming it is engaged and is breached), could not result in the ELP being out of general conformity.

Rolling forwards the London Plan figure for Enfield, based on the annual average over ten years, would require 1,246 homes a year, or 24,920 over a twenty-year plan period.

A 22-year plan period (2019-2041) would require 27,412 dwellings.

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January 2024