



Strategic Planning and Design  
Enfield Council  
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10 August 2021

By email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk)

Dear Sir/ Madam

## **LONDON BOROUGH OF ENFIELD DRAFT LOCAL PLAN CONSULTATION RESPONSE**

### **1. INTRODUCTION**

At Modomo, we are pioneering meanwhile housing because we are passionate about its potential to help solve the housing crisis in the here and now. We are in active discussions about opportunities for meanwhile housing with Peter George and the Meridian Water team, and have started discussions with Joanne Drew about how meanwhile housing could support the Council deliver meanwhile Temporary Housing and meanwhile homes. We first engaged with the Enfield planning officers in early 2019 when we undertook a pre-application process to support our tender proposal for the teardrop meanwhile tenders. We intend to come to talk to your planning officers for a strategic discussion on these opportunities in the near future.

### **2. BENEFITS OF MEANWHILE HOUSING**

The delay that occurs between securing planning permission for new homes and their delivery is a significant contributor to the UK's housing crisis. At present, there is vacant land for over 1 million homes in England where planning permission has been granted but no homes have yet been built.

Recognising that there should be an emphasis within national planning policy on supporting the effective use of land, the national Planning Practice Guidance was updated in July 2019 to highlight the value of temporary uses on sites, including residential uses (paragraph 003 Reference ID: 66-003-20190722). The guidance encourages local planning authorities to support opportunities for the temporary (also known as meanwhile use) of sites which can include housing while land waits long term development. This approach has also been



embraced by the Greater London Authority in the adopted London Plan at Policy H3: 'Meanwhile Use as Housing' (see appendix A).

Meanwhile housing is a bold and innovative way of addressing the delay between the granting of planning permission and build-out by rapidly generating additional capacity on land that would otherwise stand idle in the short-to-medium term. Meanwhile housing is the means by which the potential of this land can be unlocked immediately to create the homes people need right now, without predetermining its ultimate status.

Meanwhile housing is therefore not an alternative to permanent accommodation, it is an additive solution which taps into capacity that will always exist between land purchase and build-out, particularly in the case of large-scale complex regeneration projects.

By recognising the inherent nature of this capacity and its potential, and factoring it into wider policy making, we will all benefit from it through the delivery of the right homes in the right places at the right time. By focusing on areas that have already been earmarked for development, the deployment of meanwhile housing can also help to ease the pressure to develop greenfield sites.

Modomo is already building invaluable relationships across the land and property sector and is in advanced discussions about delivering meanwhile housing across a range of key regeneration sites.

### 3. SUPPORT FOR MEANWHILE HOUSING IN THE LOCAL PLAN

The London Borough of Enfield's Draft Local Plan currently contains a policy on meanwhile uses (Policy DM TC5), shown at Appendix B. Modomo is very supportive of the inclusion of this policy, and agrees with the benefits of meanwhile development identified in the policy and supporting text.

However, in response to the question raised at Chapter 10 Item 5 in the consultation document, Modomo requests that the Council strengthens the policy wording in regards to meanwhile housing to bring the policy in line with the adopted London Plan Policy H3. Modomo suggests the following:

- Include appropriate policy wording to identify the opportunity presented by meanwhile housing development to make efficient use of land while it is awaiting longer-term redevelopment.
- Include recognition in the policy wording the role that meanwhile housing can play in accelerating the delivery of later-stage permanent development on sites that have been identified for substantial development over the long-term.
- The policy wording should clarify that a meanwhile consent does not change any underlying land use designations which may exist on development sites, therefore



protecting such sites so they may be brought forward in line with the Council's long-term aspirations following the cessation of the meanwhile use.

- Make it clear in the policy wording that the meanwhile use of a site for housing will count towards meeting the Council's housing targets.
- Ensure that the policy wording is clear that the meanwhile use of sites is time limited and therefore very different to permanent housing consents. For example, meanwhile housing is moveable accommodation aimed at accelerating housing delivery and therefore unable to economically contribute through planning obligations and levies in the same manner as permanent development of the underlying land.

There are a number of residential and mixed-use site allocations proposed within the Draft Local Plan, many of which would benefit from inclusion of strategic support for meanwhile housing development through Policy DM TC5. Modomo also encourages the London Borough of Enfield to update the site allocation policies to reflect the above.

## 5. CONCLUSIONS AND NEXT STEPS

Modomo welcomes the opportunity to comment on the London Borough of Enfield's Draft Local Plan. The points raised in this representation should be taken account of in emerging local policy.

Modomo would be pleased to engage with the Council on the topic of meanwhile housing and to help specifically shape the local planning policy. The best contact to take conversations forward is John Baker at Modomo via [john.baker@modomo.co](mailto:john.baker@modomo.co) or Chris Gascoigne at DP9 via [chris.gascoigne @dp9.co.uk](mailto:chris.gascoigne@dp9.co.uk).

We look forward to hearing from you.

Yours faithfully



## APPENDIX A: London Plan (2021) Meanwhile Policy

### Policy H3 Meanwhile use as housing

A Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development

- 4.3.1 Meanwhile uses are a range of temporary uses on land and property awaiting longer-term development. Some vacant land is suitable for meanwhile use as housing. To make efficient use of land that would otherwise be left vacant, boroughs are encouraged to identify sites that are suitable for residential occupation to be used for **meanwhile housing** including land in both public and private ownership. Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site for housing does not change the established land use of the site, and this should be made clear in the temporary planning permission. However, meanwhile housing should count towards meeting a borough's housing target.
- 4.3.2 The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. **Parameters** for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.
- 4.3.3 Meanwhile housing can be provided in the form of **precision-manufactured homes**. This can reduce construction time and the units can potentially be reused at a later date on another site.
- 4.3.4 The **time period** for meanwhile uses will vary and temporary permission may be renewed with consideration for site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.



## APPENDIX B: Draft Enfield Local Plan (2021) Meanwhile Policy

Policy DM  
TC5: Meanwhile uses

### 10.5 Policy DM TC5: Meanwhile uses

DRAFT POLICY DM	TC5	Meanwhile uses
		<ol style="list-style-type: none"><li>1. Meanwhile uses should enhance the character and vitality of the area, maintain active ground floor frontages and retain any existing shopfronts. Meanwhile uses should ideally be precursors to the permanent development that follows, providing positive activation of sites for the economic, social and/or environmental benefit of an area.</li><li>2. Meanwhile creative, exhibition and performance spaces that align with Culture Connects<sup>32</sup> (or any updating successor) will be supported, subject to the agent of change principle.</li></ol>

#### Explanation

- 10.5.1 Meanwhile uses are defined as the temporary use of land or buildings before a permanent use is introduced. They have the potential to support the vibrancy of centres by encouraging new business, community, cultural and environmental initiatives, attracting visitors and footfall. They can help address vacant units and sites, especially in the early phases of major developments. Developers are encouraged to open up vacant land or buildings to meanwhile activities wherever possible.
- 10.5.2 Through occupying land, buildings or units on a temporary basis, meanwhile uses can be low cost and low risk, making them attractive to business start-ups, community groups and the creative and cultural sectors. Meanwhile uses can act as productive testing ground for ideas that can be incorporated into the permanent developments that follow. Developers are required to put in place appropriate mechanisms to support occupiers of meanwhile spaces to secure permanent accommodation, including through signposting to appropriate opportunities including potentially locating within the permanent development.
- 10.5.3 Meanwhile uses outside town centre locations will be supported subject to the agent of change principle. Uses which are not considered suitable meanwhile uses include vehicle parking.