



Sent by email to: localplan@enfield.gov.uk

13/09/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Enfield Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the Enfield Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Housing requirement and supply (SS1 and H1)

Housing Requirement

2. Policy SS1 and H1 both state that provision will be made for at least 25,000 homes up to 2039. This equates to the delivery of 1,249 dwellings per annum (dpa) and is in line with the expected levels of delivery set out in the London Plan. The plan period is also consistent with paragraph 21 of the NPPF which states that strategic policies should look ahead for a minimum of 15 years following the adoption of the local plan. Therefore, whilst the London Plan examines needs to 2028/29 it is appropriate and consistent with national policy for these needs to be extended to cover the whole plan period. HBF broadly supports this approach as it accords with the new London Plan and agree that this should be considered the minimum number of homes to be delivered. However, it is also important to note that this is a capacity constrained requirement that was reduced from 1,876 by the Inspectors examining the London Plan.
3. As the Council will be aware the London Plan assesses in aggregate the housing need across all of London and then sets a housing target for each of the boroughs based upon a judgement about capacity. The mayor has only been able to set housing requirements for ten years because housing land capacity after 2028/29 is subject to great uncertainty. The mayor intends to produce a revised London Plan before the termination date of the new London Plan with revised targets and



housing requirements to address the shortfall of 14,000 homes per annum that resulted from the over assessment of delivery from small sites and the subsequent amendments by the Panel examining the London Plan.

4. Therefore, whilst the Enfield Local Plan is doing the correct thing by projecting forward the capacity-constrained figure beyond the period set out in the London Plan to ensure consistency with paragraph 22 of the NPPF the Council must be mindful of the fact that:
 - a. Actual housing needs per annum are much higher over the next ten years than stated in table 4.1 of the London Plan and as such the Council should adjust their minimum housing requirement to reflect the evidence of needs for the Borough not on the capacity constrained target in the London Plan;
 - b. It will need to commit to updating its local plan to reflect any changes in evidence, and especially evidence relating to the capacity of the Borough. The Council should be clear in the local plan that an early review may need to be undertaken prior the statutory 5-year review required of all local plans if Enfield are to support collective efforts to address the significant shortfalls in housing supply in the Capital.

Housing Supply - overall

5. As the Council note the Housing Topic Paper, housing supply in Enfield has fluctuated in the Borough and is heavily influenced by the phased delivery on large schemes. As such it is important that the Council has a significant buffer in its housing supply to ensure that its housing needs are met in full. Current supply, as set out in Table 8.2 of the Local Plan over the plan period is estimated to be 30,192 homes – over 6,000 homes more than the minimum requirement. This equates to a 25% buffer between need and supply and is a position supported by the HBF.
6. Whilst the HBF does not comment on specific sites it is essential that the Council consider the sites they expect to come forward through this local plan to be deliverable or developable on the basis of the policy costs set out in this local plan. As such we are concerned that the viability study indicates at tables 12.5b and 12.5c that development of many of the tested typologies in the medium and lower values areas of the Borough are not viable on the basis of cumulative costs being placed upon them through this local plan. Whilst we accept that some negotiation is inevitable, we would suggest that a reduction in the policy costs being placed on new development in these areas is necessary to ensure development can come forward without the need for lengthy negotiations. Such an approach would be consistent with paragraph 58 of the NPPF as well as supporting the deliverability of development being proposed through this local plan.
7. In order to be consistent with paragraph 22 of the NPPF it will also be important for the Council to provide more information on development beyond 2039 within the place making areas. These are locations where a significant amount of development in the Borough will be delivered, and it is essential that a long-term vision for these areas is established in the local plan.

Housing supply – small sites

8. The Council outline in SS1 and H4 that small sites will form part of the Councils housing supply and that the Council will seek to deliver 353 homes on sites of less than 0.25 hectares. Firstly, we assume this to be an error given that table 4.2 of the London Plan sets a target for Enfield to deliver 3,530 homes on small sites. This will clearly need to be amended. As well as setting out its expectations for each borough with regard to the delivery of small sites policy H2 in the London Plan, requires London boroughs, among other things, to identify and allocate appropriate small sites for residential development. In addition, paragraph 69 of the NPPF requires the Council to identify at least 10% of its housing requirement (around 2,500 homes) should be on land of 1 hectare or less that has either been identified as an allocation in the local plan or in the Brownfield Register.
9. However, what is not clear from the consultation document is the number of small sites that will be specifically allocated in the local plan or identified in the brownfield register. The reason for these policies is to help support and consolidated the work of SME housebuilders who have declined significantly since the advent of the planned system in 1990, owing chiefly, to the reluctance of local authorities to identify and allocate small sites. The paucity of allocations for smaller sites means that smaller developers fail to benefit from the statutory principle for applications to be determined in accordance with the development plan.
10. Without a land-use allocation the acceptability of development is doubtful, and it is costly, time-consuming, and very risky to promote a site and secure a planning permission. It is therefore essential that the Council ensure there are sufficient allocations on small sites to meet the expectations of both the NPPF and the London Plan. If the Council do not have sufficient smaller sites, it must revisit its land supply in order to ensure it is consistent with national policy and better supports this objective of the London Plan.

Sustainable design and Construction (DM SE2)

11. The Council requires major residential development to work towards achieving at least a 4-star rating under the Home Quality Mark. We recommend that the Council deletes this reference and adheres to the Building Regulations instead as the standard measure for building performance. The Government's ambitions relating to the Future Homes Standard will be measured through the changes it will make to the Building Regulations that will be required from July 2022. The Council would assist the development industry if it adhered to the Building Regulations as the single, authoritative, set of standards.

Reduced energy demand (DM SE4)

12. The housebuilding industry, through the HBF, recognises that there is a need to improve the environmental performance of new residential development. In order to achieve this, we established, with a wide range of partners, the Future Homes

Task Force. This task force examined how the house building industry can work toward delivering net zero homes by 2050. The initial outcomes of this work can be found at <https://www.futurehomes.org.uk/> with a summary of the Delivery Plan resulting from this work attached to this response.

13. The delivery plan published by the task force in July outlines the need to operate on a collective basis recognising the need for housebuilders, their supply network and the trades people building homes to successfully transition to the delivery of low carbon homes. In addition, it recognises the need for both national and local government alongside housebuilders to ensure those people buying new homes are confident in the technologies and systems being used. As such the HBF consider a national and standardised approach to improving the energy efficiency of buildings to be the most effective approach in that it balances improvements to building performance with the continued delivery of housing and infrastructure.
14. As such the HBF advises strongly against local plans policies on matters relating to the construction and performance of residential buildings. This is an area that is subject to great change over the next few years as the Government, working with housebuilders and suppliers, devise a feasible pathway to zero carbon homes. Consequently, there is the risk that local plan policies in this area will become out-of-date swiftly. Local plan policies from the past on matters relating to the environmental performance on new dwellings have fallen short, such as the enthusiasm for district heating systems with residents bound-into expensive contracts from which they are unable to escape, and problems with over-heating (hence the new emphasis on ventilation in the revised Building Regulations – Part F). We advise a strongly against the Council making policy in this area.

Green House gas emission (DM SE5)

15. As outlined above the most effective approach to delivering improvements in the energy efficiency of new homes in order to reduce greenhouse gas emissions alongside meeting housing needs is through the application of consistent national standards. This allows for a collective response from both housebuilders and the industries that supply them to ensure that by 2025 all new homes will be produce 75% fewer emissions. In order to achieve net zero emissions will then require the decarbonisation of the national grid.

Affordable Housing (H2)

16. We recognise that this consultation document was produced prior to guidance and policy on First Homes being published but it will be necessary moving forward for the Council to ensure that the delivery of First Homes is an integral part of this policy. The Council will need to ensure the potential impacts on viability of First Homes is taken into account. As part of this testing, it is important to recognise that First Homes are a market product and as such the risk is with the developer, unlike for affordable housing where the developer is effectively a contractor delivering units for the RSL. This means that the risk associated with their delivery

is different to an affordable unit and as such profit associated for the delivery of such homes must be the same as for market housing.

17. We are also concerned that the viability study indicates that many development typologies in the lower values areas and higher density development in medium value areas will not be viable if required to deliver a 35% affordable housing contribution. Whilst we acknowledge that the Council states that where an applicant can demonstrate their development is made unviable by policy H2 it will consider reducing this requirement it is also necessary to consider that the NPPF and PPG are both clear in the Government's objective of reducing the amount of negotiation at the planning application stage. In order to achieve this objective, it is important that local policies reflect the viability evidence and provide more variation by both area and development typology. Such variation in policy will help to ensure development comes forward in these areas without recourse to negotiation on every application. We would suggest that the Council reconsiders this policy and set out a reduce affordable housing requirements in its lower value areas.

Housing Mix and Type (DM H3)

18. It is unclear why table 8.4 has been included in the policy and what its purpose is and no indication as to how this should be considered by an applicant or whether or not these priorities are requirements. If so, it should make this clear in the policy. Local plan policies need to be clear and unambiguous (NPPF, paragraph 16 d)) and the inclusion of table 8.4 will cause confusion to decision makers and applicants alike and as such should be deleted.
19. In addition, we would also suggest that part 1a. of this policy should be reference the London Plan which identifies that the greatest need in the type of homes between 2018-2041 is for one-bedroom homes – 55% of the overall supply (market and affordable). This is set out in the GLA SHMA 2017 that informed the new London Plan. As set out earlier London is considered to be a single housing market area. This means that supply in Enfield is meeting the wider needs of London and as such it is important that these are considered by decision makers and applicants. Amendments to Part 1a. must also include references to monitoring data (both from the GLA and the Council) and that these should be considered when assessing housing mix. This recognises that housing needs assessments are a snapshot in time and that needs can vary as plans are implemented.

Support and Specialist Housing (DM H5)

20. The London Plan sets out in table 4.3 the benchmarks for the delivery of specialist older persons accommodation. This establishes the need for Enfield to deliver 195 such homes per annum over the plan period. This needs to be set out in policy H5 with a clear commitment to meet this level of need and, as set out in policy H13 of

the London Plan, to work positively and collaboratively with providers to identify sites to ensure this minimum level of provision is met.

21. On the basis that paragraph 4.13.9 of the London Plan requires local authorities to plan proactively to meet the indicative benchmarks it is important that the Council includes an effective mechanism to ensure these needs are addressed in full. To achieve this, we would suggest the following clause be added to policy H5 alongside the commitment to meet the benchmarks required by the London Plan:

In the event that the annual benchmark is not achieved in a year, the Council will operate a presumption in favour of proposals for older persons housing in the subsequent year. This presumption will continue to operate until the benchmark has been achieved.

Conclusion

48. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

Yours faithfully