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Enfield Housing Needs Case

Iceni Projects Limited on behalf of
Fairview New Homes Limited

September 2021

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ON BEHALF OF FAIRVIEW
NEW HOMES LIMITED

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1. INTRODUCTION

- 1.1 Fairview New Homes is one of a number of parties which is promoting development of land at Chase Park, Enfield through the Local Plan process. The land falls within Metropolitan Green Belt and it is therefore necessary to demonstrate ‘exceptional circumstances’ for the alternation of the Green Belt boundaries through the plan-making process. Para 140 in the NPPF sets out that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

Exceptional Circumstances Case Law

- 1.2 Relevant case law has considered what might constitute exceptional circumstances justifying the release of land from the Green Belt.
- 1.3 In the Calverton Parish Council case¹ Mr Justice Jay found having quantified housing need, a Council should then consider whether exceptional circumstances exist having regard to a number of factors, including the acuteness/ intensity of the objectively assessed housing need, the inherent constraints on the supply and availability of land suitable for development, the difficulties in achieving sustainable development without impinging on the Green Belt, and the extent to which the impacts on the Green Belt purposes can be ameliorated or reduced to the lowest practicable extent. The intensity of housing need and impacts of not meeting this; together with the potential (or otherwise) to meet development needs without Green Belt land (as now required through NPPF Para 141) should therefore rightly be addresses as important considerations in justifying Green Belt release.
- 1.4 In the case of a challenge to the Guildford Local Plan², Mr Justice Ouseley clarified that concept of exceptional circumstances in national planning policy is deliberately broad. It could be an individual exceptional circumstance but equally an accumulation or combination of circumstances of varying natures which together are sufficiently exceptional so as to warrant altering the Green Belt boundary. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgement that “exceptional circumstances” exist; and the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

¹ Calverton Parish Council v Nottingham City Council et al [2015] EWCA 1078 (Admin)

² Compton Parish Council v Guildford BC & SSCLG [2019] EWCA 3242 (Admin)

Scope of this Report

1.5 In this report, Icen Projects (Icen) has sought to undertake additional bespoke research on housing needs issues to inform consideration of the exceptional circumstances case justifying the release of Green Belt land through Enfield's Local Plan. Our report:

- Reviews and summarises relevant elements of the Council's evidence base regarding housing need, including the scale and nature of that need;
- Interrogates the evidence further, to demonstrate the acuteness of the housing need, and urgent need to increase housing delivery – particularly of affordable housing;
- Articulates how the release of this site from the Green Belt could contribute to meeting these needs, including how its housing offer is targeted to meet the acute needs evident.

2. MEETING OVERALL DEVELOPMENT NEEDS

- 2.1 Enfield's Local Plan is being prepared in the context of national planning policies – as set out in the National Planning Policy Framework – and the London Plan – the Spatial Development Strategy for Greater London.

Meeting Development Needs

- 2.2 For plan-making, the NPPF defines sustainable development as meaning that plans should promote a sustainable pattern of development that meets the development needs of the area. Strategic policies should, as a minimum, provide for objectively assessed needs for housing unless there are policies in the Framework that protect areas or assets of particular importance that provide a strong reason for resisting development, or the adverse impacts would significantly and demonstrably outweigh the benefits (NPPF Para 11b). The focus is on meeting identified development needs and this is a key component of achieving sustainable development.
- 2.3 The principle of meeting development needs is reiterated in NPPF Para 20, and in the soundness tests for local plans set out in Para 35. For a plan to be positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (and where appropriate unmet needs from neighbouring authorities) where it is practical to do so and consistent with achieving sustainable development. It must adopt an appropriate strategy, and be based on proportionate evidence, and be deliverable over the plan period.
- 2.4 NPPF Para 61 outlines that the minimum number of homes needed, plans should be informed by a local housing needs assessment conducted using the standard methodology (unless exceptional circumstances exist to justify an alternative approach). Para 62 outlines that the size, type and tenure of housing needed – including the need for affordable housing, homes for families with children, of self-builders and other groups – should be assessed and reflected in planning policies. The clear focus is on identifying and then seeking to meet housing need.
- 2.5 Policies relating to Green Belt land are then set out in NPPF Chapter 13. Across England around 12.4% of land is designated as Green Belt. There are many misconceptions of what Green Belt is. Green Belt is not an environmental designation. Green Belt policy was developed to counter unplanned inter war and post-war urban sprawl that was seeing towns and cities merge at the time, with the aim of encouraging repair and regeneration of cities in the immediate post-war period through restricting development outside the larger cities across the country.

- 2.6 Alongside this, new towns were designated to accommodate planned growth. It is a policy construct which aims to promote the effective use of land and direct development to sustainable locations, rather than to constrain the ability to meet development needs.
- 2.7 The NPPF outlines that the fundamental aim of Green Belt policy is to prevent urban sprawl but keeping land permanently open. Green Belt boundaries can only be altered where exceptional circumstances are shown to exist through the plan-making process, and full consideration has been given to all other reasonable options for meeting the identified need for development – including that at much use as possible has been made of suitable brownfield sites and under-utilised land.
- 2.8 But Green Belt policy does not mean that identified development needs can simply be ignored as that would not constitute sustainable development. Indeed, the fundamental aim of Green Belt policy is to direct development to sustainable locations, and where there are not other options for accommodating development, Green Belt boundaries may need to be reviewed.

Strategic Questions and Overall Housing Need

- 2.9 The Government's standard method (using the latest data) shows a need for delivery of 85,500 homes per year (rounded) across London. For Enfield it shows a need of 2,355 homes per year.
- 2.10 The mechanics of the local housing need calculation are shown below. In effect, because of the effect of the cap within the standard method the LHN of 2,355 dpa is derived by firstly applying a cap which constrains the housing need to 40% above the London Plan requirement (which is a requirement of 1,246 dpa), and then applying a further 35% uplift to this. As the diagram below shows, this results in an LHN figure which is only modestly above the projected household growth (by 2%).

Figure 2.1: Enfield's Local Housing Need (dpa)



- 2.11 It is worth noting in this context that the initial assessment of need from Steps 1 and 2 of the method (before the figure is capped) would be 3,714 dpa.

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- 2.12 The Enfield Local Plan needs to be in general conformity with the London Plan, the latest iteration of which was published in March 2021. The London Plan was prepared and examined against the context of the 2012 NPPF. The GLA's 2017 London SHMA identified a need for 66,000 additional homes a year across London. It is notable that this falls below the assessment of need using the standard method which is for 85,500 homes per year – the aggregate need is now thus assessed as 30% greater.
- 2.13 London Plan Policy H1 (together with Table 4.1) set 10 year housing targets that it states boroughs should plan for and seek to deliver. These were set based on the capacity identified in the 2017 London SHLAA. Across London, the Plan makes provision for 522,870 homes over the 2019/20 – 2028/29 period, equivalent to almost 52,300 homes per annum. It is notable that this falls substantially (over 20%) below the housing need as assessed as part of the London Plan's preparation, and (if these targets are achieved) would meet just 61% of the assessed need using the standard methodology across London.
- 2.14 NPPF Para 22 requires strategic policies in local plans to look ahead over a minimum 15 year period from adoption. Enfield's Local Plan therefore needs to look beyond 2029. Para 4.1.11 in the London Plan outlines that if a target is needed beyond the 10 year period, Boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity, in consultation with the GLA, and any additional committed transport infrastructure, and roll forward capacity assumptions for small sites. Such an approach is however arguably not consistent with national policy.
- 2.15 In interpreting the policy framework provided by the London Plan, regard should be had to the Inspectors Report of the Panel Examination of it. This makes clear that the London Plan housing targets were reduced through the Examination process as the Panel did not consider the assumptions on delivery from small sites to be realistic.
- 2.16 It also outlines that in the context of the failure to meet the annual need for housing by some margin, the Inspectors did consider whether the plan should be paused or withdrawn (Para 175) highlighting the Inspector grave concerns regarding the shortfall in meeting housing need. But they concluded that it was difficult to see how the number of deliverable housing units could be increased [further] without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East; but they concluded that this would take time and so instead should be taken forward through a plan review.
- 2.17 The Inspectors Report found that a review of the Green Belt in Greater London needed to be considered in light of the residential land capacity in London being insufficient to meet the housing need (together with the potential shortfall of industrial land in the medium to longer-term). The Inspectors in Para 455 found it implausible to insist that the Green Belt is entirely sacrosanct without considering what it comprises and the impact that it has on wider strategic objectives. In Para 456

they went on to conclude that a Green Belt review would be a logical step to assess whether it would be reasonable to release Green belt land in order to close the gap between housing need and supply in London. They recommended a strategic Green Belt review be undertaken, led by the Mayor. They concluded that it would be wrong to unilaterally rule out changes to the Green Belt given the identified need for housing.

- 2.18 Indeed, the Secretary of State directed that the text of London Plan Policy G2 regarding Green Belt be amended to make clear that exceptional circumstances are required to justify the extension or de-designation of Green Belt through the preparation of a Local Plan, deleting the GLA's text which sought to indicate a lack of support for de-designation.³
- 2.19 The Secretary of State's letter of 29th January 2021 further makes clear an expectation that the Mayor starts work on a new London Plan to bridge the significant gap between the housing which the 2021 Plan seeks to deliver and "the actual acute housing need London faces."
- 2.20 The Inspectors Report and directed amendments to the London Plan thus makes clear that:
- a) the considerable shortfall in meeting housing need across London is capable of amounting to exceptional circumstances justifying the release of Green Belt land for development;
 - b) London Boroughs are able to plan for housing need above the housing targets set out to 2029 in the London Plan;
 - c) Boroughs can consider whether exceptional circumstances exist justifying the release of Green Belt land through their local plans.
- 2.21 Enfield's Housing Numbers Topic Paper (May 2021) then drills into questions of the appropriate basis against which the Council squares issues of consistency with national policy and general conformity with the London Plan in setting the housing requirement. It outlines that the standard method is 4373 dpa (uncapped) or 2355 dpa (capped).
- 2.22 The Topic Paper outlines that Local Plan has a period looking to 2039, whereas the London Plan targets run only to 2029. Stantec found the London Plan did not provide clear basis for considering what requirement to adopt given plan looks to 2039. Stantec recommended that a roll forward of the London Plan scenario be considered (36,010 homes when applied to the plan period to 2039); as

³ Letter to the Mayor of London, 13th March 2020, Annex 1

well as considering the standard method for the Borough. The latter generates a figure of 56,190 homes.

2.23 The Council has interpreted this through its Housing Topic Paper (May 2021) to generate a number of options in respect of overall housing provision identified in the Plan:

- Option 1: Baseline Housing Target – 17,000 homes – 1246 dpa London Plan requirement to 2029 and then 500 dwellings thereafter based on the London Plan SHLAA 2017
- Option 2: Medium Growth – 25,000 homes – based on the 1246 London Plan requirement to 2029 extended from 2029 to 2039.
- Option 3: Higher Growth - 55,000 homes – based on the London Plan target to 2029 and applying the standard method thereafter.

2.24 This is clearly a complex area, with a degree of conflict between issues of ‘general conformity’ with the London Plan and the need for the Plan to be consistent with national policies in the NPPF so as to be sound. Icení would make the following comments:

a). Through the London Plan EIP, the Inspectors effectively confirmed that consideration of Green Belt development needed to be given in order to address (or at least close the gap) between assessed housing need and the level of housing provision which is being planned for;

b). The Inspectors advocated a Strategic Review of the Green Belt. Realistically there is unlikely to be a political appetite for this, and therefore it is for individual boroughs to consider and address these issues through the Local Plan process. This is implicit in the amendments required by the Secretary of State to Policy G2;

c). It is evidently not appropriate to treat the London Plan requirement as a cap or limit to provision (either to 2029 or extended to 2039). Indeed, the Secretary of State himself has emphasised the need for consideration of how higher levels of housing provision can be achieved. Consideration should be given to the potential to meet housing need within the area – i.e. Enfield meeting its standard method housing need.

d). This is evidently the case given that the London Plan requirement is a constrained figure which neither meets Enfield’s needs – indeed it falls below household growth projected for Enfield even before any consideration is given, as per national policy, to improving affordability; nor forms part of a redistribution in which these needs are in effect met elsewhere in London. London overall falls well short of meeting its housing needs.

e). The Secretary of State has effectively endorsed the need for consideration of development on Green Belt land within London in order to address the unmet housing need and increase housing delivery within Greater London.

2.25 In respect of supply, the Enfield HEELA 2021 identifies capacity for 16,571 new homes on urban sites, and an unidentified windfall capacity for 1,540 dwellings, bringing total SHLAA capacity to 18,111 dwellings.⁴ Density assumptions have been evidently carefully considered within this. However, it is clear that:

- This urban capacity alone, without green belt development would meet deliver an average of 953 dwellings pa over the plan period to 2039. This would fall well short of meeting development needs.
- The supply position is very much focused on the early and mid parts of the plan period. Supply over the 2030-39 period identified is just 4,294 dwellings, which if all delivered would see housing delivery of at best 477 dpa over this latter period. This falls further short still of meeting housing needs.
- The evidence thus clearly shows that there is insufficient potential capacity to meet development needs wholly within the existing urban area, providing a clear quantitative case for Green Belt development in the Borough.

2.26 The Council's proposed approach in Policy H1 in the emerging Plan is the Option 2 scenario of rolling forward the London Plan requirement. Whilst we recognise the benefits of consistency of this with the London Plan, we would note:

- This level of housing provision meets just 53% of the assessed minimum LHN for the Borough, leaving a substantial shortfall of over 22,000 dwellings.
- This level of provision would not even meet the demographic needs of the Borough, at 2314 dpa. It would fall short of this by over 21,300 households over the plan period. In the absence of supply elsewhere in London, household formation would be constrained and there would be potential displacement effects of households from the Borough to areas beyond London, such as into Hertfordshire/ Essex.

⁴ See Housing Topic Paper Para 4.6

2.27 The plan-making process therefore needs to consider whether more can be done. The broader issues of the types of homes delivered, and the ability to deliver affordable housing to meet the need which exists are considered in the subsequent sections of this report.

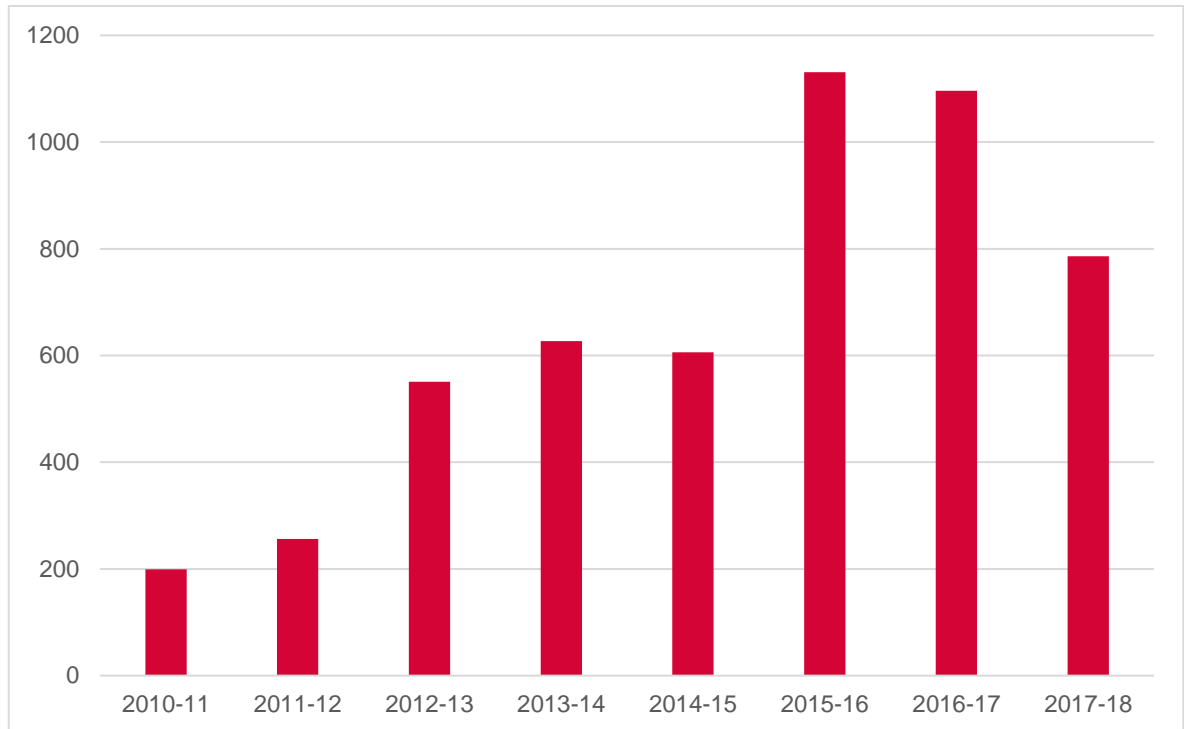
3. AFFORDABLE HOUSING NEEDS

The Housing Crisis and Affordable Need in Enfield

- 3.1 Enfield's Housing and Growth Strategy 2020-30 identifies a housing market in crisis with too few social and affordable rented homes and a growing number of people in low incomes forced to live in the Private Rented Sector where rents are rising, homes are unaffordable and there is insecurity of tenure and in many cases unacceptable housing standards.
- 3.2 The Strategy sets out that less than 15% of PRS properties are 'affordable' on Local Housing Allowance rates. Growing pressures, it sets out, are resulting in increasing numbers of people becoming homeless in Enfield and the Council is evidently struggling to meet these needs, resulting in too many people living in temporary accommodation.
- 3.3 There are also major challenges for would-be homeowners: the Strategy describing homes for outright sale as often being unaffordable and out-of-reach of many residents; resulting in people working in essential local services – teachers, social workers, nurses, police officers – having to choose whether to stay locally in overcrowded accommodation or move out of the Borough. There are clear negative social and economic consequences of this.
- 3.4 The Strategy clearly paints a picture of a local housing crisis, including:
- Average house prices in 2019 which were 62% above the England average and 12.3 times the median salary;
 - Many households in the Borough on median and low incomes having to spend more than 40% of their disposable income on housing costs, pushing many people into poverty;
 - The acute homelessness challenge, arising from the scale of need and limited supply of affordable homes, being borne out in spending of £66 million in 2018/19 on temporary accommodation – this being a significant and growing cost to the Council; and
 - An expectation from the Council that these pressures are likely to increase given the borough's population profile and projected future growth.
- 3.5 The Council's Homelessness Strategy 2020-25 provides further context around the main issues relating to homelessness specifically in the Borough recognising that homelessness has increased significantly over the last decade. Although this has been the case nationally and in London generally, the rate of growth in Enfield has been exceptional.

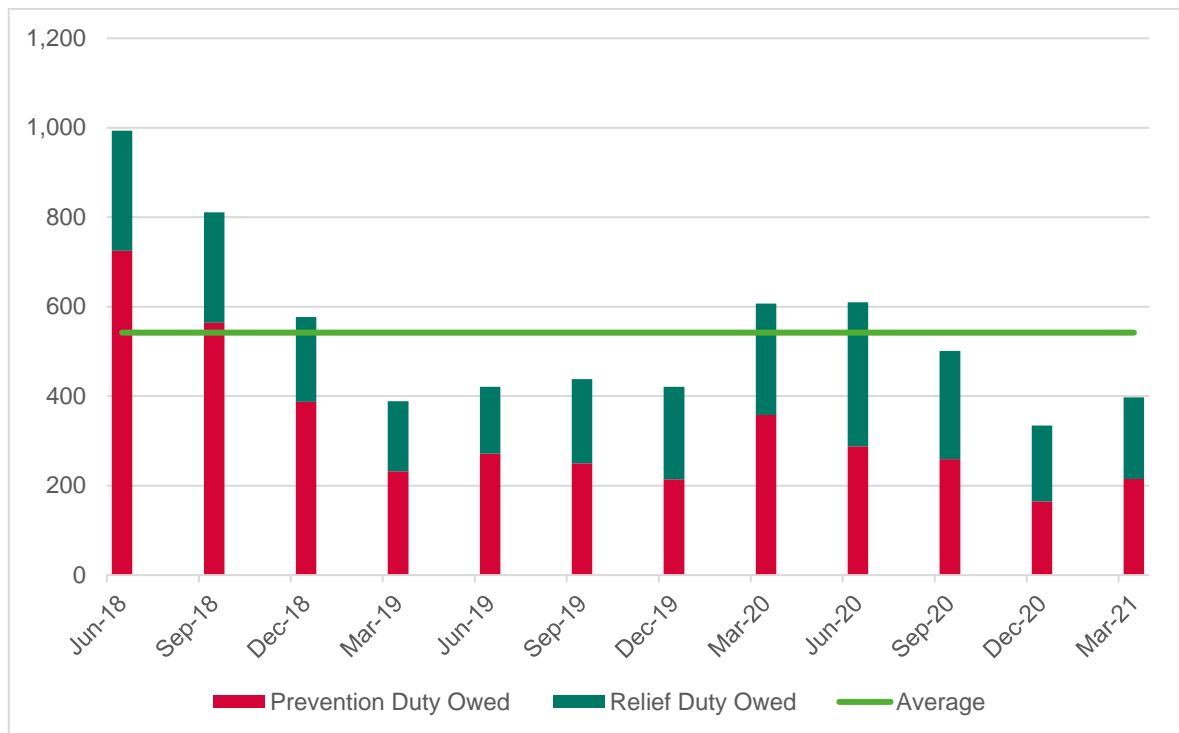
3.6 To put this in context, the Borough has experienced a 246% increase in homelessness acceptances between 2010 and 2017 compared with a 35% rise in London. The Figure below shows how the number of those accepted as being homeless and in priority need changed in the Borough over the period from 2010 to 2017 which pre-dated the introduction of the Homelessness Reduction Act. In 2017/18, there were 786 homeless households owed a full duty.

Figure 3.1: Homeless Households in Priority Need, 2010/11 -2017/18



3.7 Since the introduction of the HRA in 2018 with data now reported on a quarterly basis and split out by those owed a prevention or relief duty, the Figure below shows that the Council has experienced an average of 542 households owed a full duty each quarter since 1st April 2018 (equal to over 2,000 households per annum on average). Although the numbers have reduced over the last 3 years, a substantial 1,842 households were owed a duty in 2020/21.

Figure 3.2: Homeless Households in Priority Need, Post-HRA, 2018/19 -2020/21



3.8 Through discussions with the Council's housing team, we understand that the growth in Enfield over the last decade has been particularly acute owing to many households in poverty with low financial resilience living in the PRS. In a pan-London context, it is also about rent levels. Although rents have been rising in the PRS and are a significant challenge to existing households in the Borough (25% of low-income households in the PRS have higher outgoings than income), the Borough is comparatively affordable for those on lower incomes living in Greater London.

3.9 Consequently, the other 21 London Boroughs use Enfield Borough to discharge their homelessness duty by placing applicants in Temporary Accommodation (TA) in Enfield Borough, which is having an impact on market dynamics, inflating rental values. The Council is therefore facing two different challenges resulting in higher overall need – (1) applicants who are already residents in the Borough and have lived in the area for some time and (2) incoming households from other London Boroughs, compounding the situation.

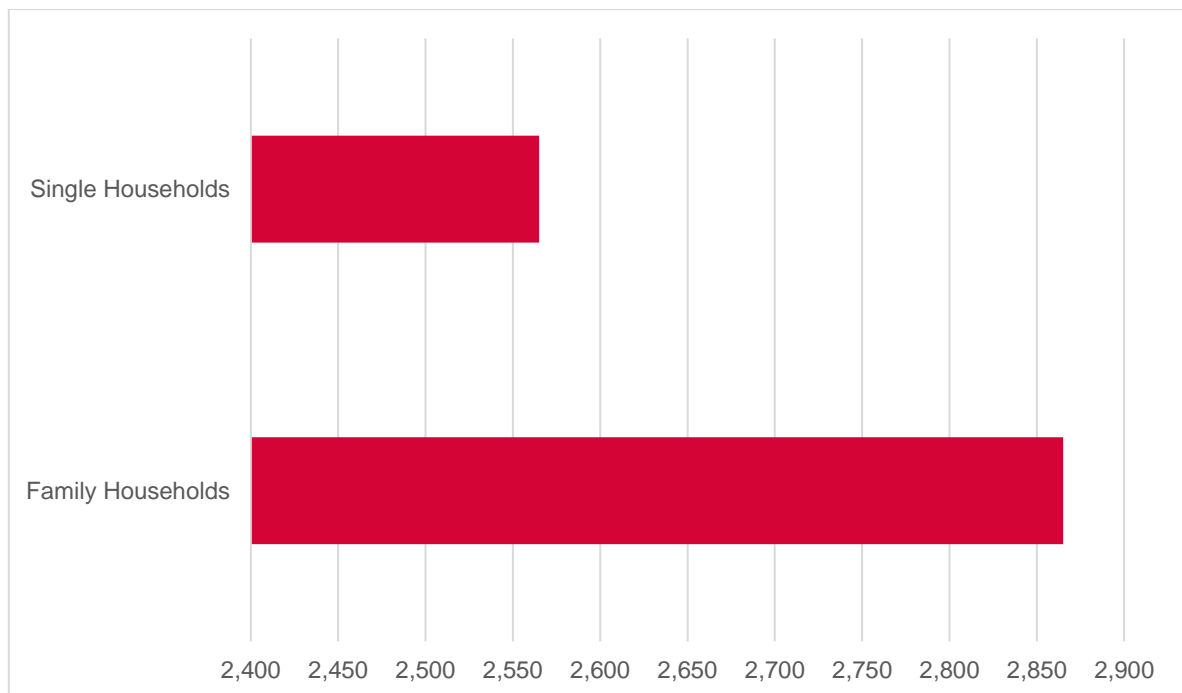
3.10 It is not wholly surprising that the key driver resulting in the growing number of applicants is therefore eviction from the Private Rented Sector (PRS) which is closely followed by households being dislodged by family or friends – together, these causes form the basis for almost two thirds (62%) of applications. The Borough has the second highest eviction rate in London and applicants are caught in a cycle between homelessness, TA and the PRS which is worsening year-on-year.

3.11 The Council's Homelessness Strategy sets out an ambition to move away from paying landlords incentives to let their properties and move towards a model where the deposit and first month's rent

is funded. This is in response to the challenges posed by Enfield Borough, as well as other London Boroughs placing applicants in Enfield, paying landlords an incentive for housing those owed a duty for two years only, before the tenant is evicted, and the cycle begins again with the next incentive due. A greater supply of affordable homes providing the opportunity for sustainable tenancies is clearly one solution.

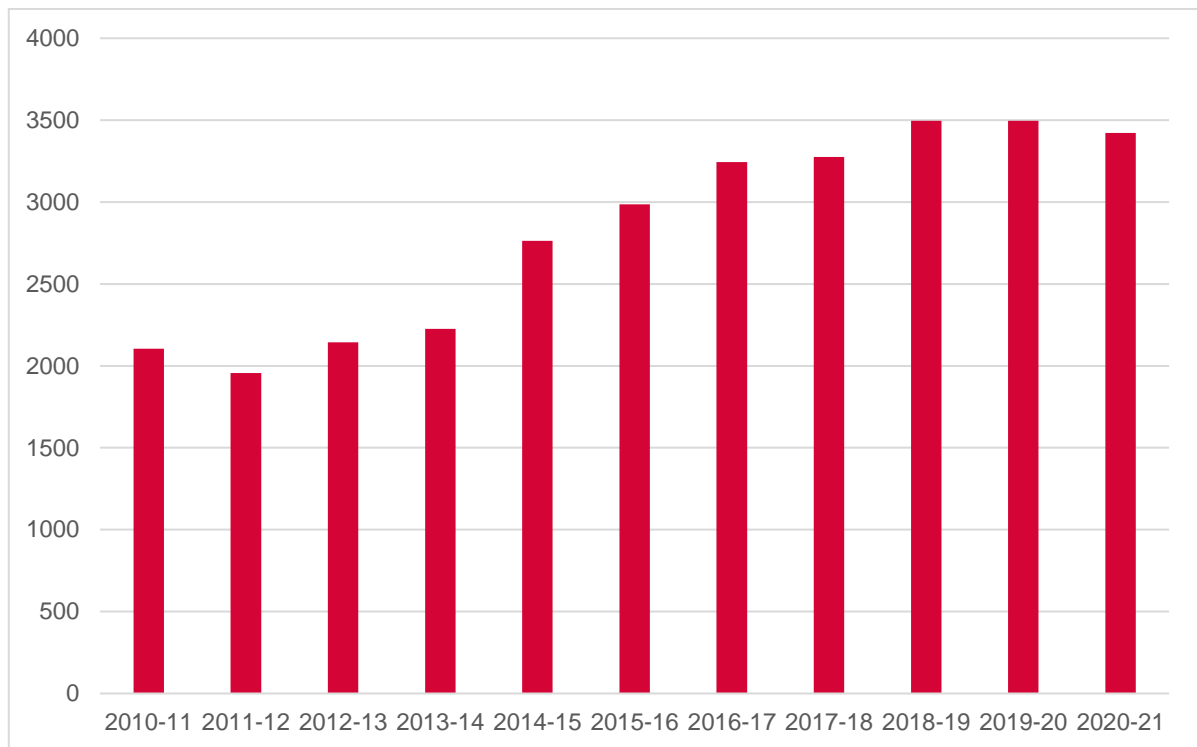
- 3.12 Turning to the profile of households owed a duty, the largest household is single female parents who account for 34% of all applicants based on data collected since the introduction of the HRA going back to 1st April 2018. The Figure below depicts the substantial number of family households applying to the Council equal to 2,865 households; of which 2,579 are households with dependent children. The urgent need for suitable and affordable family-sized accommodation is therefore obvious.

Figure 3.3: Household Composition of Homeless Applicants, 2018/19-2020/21



- 3.13 Due to a lack of suitable housing stock, temporary accommodation is a significant issue in the Borough. The Council is the second highest provider of TA in England and in the year ending 31st March 2021, there was a total of 3,442 households in TA (which the Council's housing team estimates to equate to around 11,000 people including around 4,000 children). The Figure below shows how the number in TA has increased substantially over the last decade – rising from around 2,000 to 3,500 households.

Figure 3.5: Households in TA in Enfield Borough, 2010/11-2020/21



- 3.14 It's our understanding through engagement with the Council's housing team that around 5,500 properties in the PRS are being used as TA which equates to around 1 in 5 PRS properties. Of the 3,400 households in TA in the latest monitoring year, 2,046 households were in nightly paid, privately managed accommodation which bears a substantial net cost of around £7.9m.
- 3.15 Although it is clear that the Council needs good quality private sector housing in the PRS to contribute towards addressing this substantial number in TA, crucially, we also understand that 40% of households living in TA would be subject to the benefit cap if they moved into the PRS; which is a major barrier to accessing suitable permanent housing. According to the Council's Homelessness Strategy, Enfield has the fifth highest number of households impacted by the benefit cap nationally. The Council cannot therefore discharge its homelessness duties in this way.
- 3.16 As a result, the only route through to permanent housing for many households living in this position in the Borough is the delivery affordable housing. The Council simply can't deal with this acute need without substantially boosting the delivery of affordable housing.
- 3.17 The scale of affordable housing need in the Borough has been quantified in the Enfield Local Housing Needs Assessment 2020 following the PPG methodology. It identified:
- An annual need for social and affordable rented homes from 711 households per annum, having regard to the waiting list, newly-forming households and supply. This it describes as a measure of acute need.

- In addition, an annual need for intermediate and affordable home ownership homes from 696 households per annum. We would note that such households have a need for affordable housing set against the NPPF definition.

3.18 Together this equates to **a total need for 1,407 affordable homes per year**.⁵ Set against this, the average new-build delivery of affordable housing was 121 homes per annum over the 2014-20 period. The breakdown of completions over this period is shown in the Table below.

Table 3.1 Enfield Housing Completions, 2014-2020

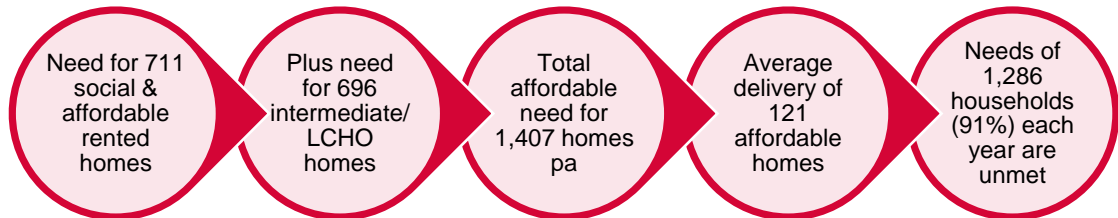
	All	Market	Affordable	% Affordable
2014/15	399	314	85	21%
2015/16	674	552	122	18%
2016/17	884	582	302	34%
2017/18	389	360	37	10%
2018/19	500	439	61	12%
2019/20	420	302	118	28%
Average	544	425	121	22%

Source: Enfield Housing Delivery Action Plan, 2020

3.19 Taking this average means that the needs of around 91% of households needing affordable housing are not being met – a position which is clearly significant and one which the Council itself sets out is worsening; and this is evidenced in the homelessness data considered above. A situation in which only 9% of affordable needs are being met is chronic, and requires urgent action.

⁵ 2021 Housing Topic Paper, Para 7.15

Table 3.2 Annual Affordable Housing Need and Supply Position in Enfield



- 3.20 The Local Housing Needs Assessment recognises that almost 2,000 households in the Borough were owed a duty under the Homelessness Reduction Act in 2019/20. This scale of need clearly restricts access to affordable housing for anyone in the most acute need, and indeed the evidence indicates that given restricted supply the Council is struggling to meet the needs of those households presenting themselves to the Council as homeless.
- 3.21 The Assessment also draws out the significant number of households in TA which we have analysed above, and outlines the challenges, including:
- There are particularly high concentrations of homelessness and TA in the east of the Borough (Edmonton) where the PRS market is driven by lettings to those on benefits, and as tenancies end households become statutorily homeless;
 - There are substantial placements of households from other London Boroughs in the PRS in Enfield. Through discussions with the Council’s housing team, we know this is influencing market dynamics at the lower end of the PRS and contributing to rental cost inflation, which in turn generates evictions as households are unable to pay higher rents.
 - The high proportion of households in TA means that the allocation of social housing is focused on those with acute housing needs, limiting the ability for other households who fall into housing need to secure affordable homes.
- 3.22 Icenis is aware from research which we have undertaken with B3 Living and Broxbourne Council regarding the housing crisis in Broxbourne that these dynamics have spill-over effects into this adjoining Hertfordshire Borough which sees in-migration of households to PRS properties who have been displaced from Enfield, and who become homeless contributing through a cascading effect to the housing crisis in the adjoining area.

3.23 According to the latest data to the year ending 31st March 2021, a substantial 746 households living in TA in Enfield (equal to 22% of the total) were housed in another local authority area due to a lack of stock.

3.24 The conclusions of the Council's own evidence are clear:

*"In conclusion, this LHNA presents evidence which demonstrates the **substantial** need for additional housing within Enfield, particularly to meet the needs of households who cannot afford to rent or buy. Affordability has worsened over time and presents a particular challenge for younger households, those on lower incomes and key workers. The Council will need to **maximise** the delivery of a range of affordable housing over the plan period to address these needs, as well as providing much needed market housing." (our emphasis).*

Meeting the Need for Affordable Housing

3.25 Government's Planning Practice Guidance specifically recognises that consideration should be given as part of plan-making to increased overall housing delivery in order to contribute to increasing the delivery of affordable housing. Once the need for affordable housing has been assessed, Para 2a-024⁶ outlines that:

"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

3.26 As the High Court has clarified, the requirement is not to meet the affordable housing need in full, but to consider whether an increase in housing provision to contribute to meeting the affordable housing need.⁷

3.27 Firstly, it is notable that **the scale of affordable housing need in the Borough exceeds the London Plan target** (as recognised in the Housing Topic Paper, Para 7.15). It would now equate to 60% of the total housing need identified for the Borough through the standard method. This

⁶ ID: 2a-024-20190220

⁷ Borough Council of Kings Lynn And West Norfolk v Secretary of State for Communities And Local Government & Anor [2015] EWHC 2464 (Admin)

contributes to the clear case for the release of Green Belt land for housing; as without Green Belt land the Borough would fall below delivery of the London Plan target figure of 1246 dpa.

- 3.28 The issue is however more than one of just numbers. The Borough's housing service is in crisis and is unable to get close to meeting the needs of households who are presenting themselves to the Council as homeless. It has insufficient stock of affordable housing to do so.
- 3.29 As a result, it is forced to house a growing number of households in TA – which we know is focussed more so on private rented accommodation and nightly accommodation such as in B&Bs. This accommodation does not provide security of tenure, is often lower quality, may not be near to households family, friends, school, work or key services, and by its very nature is not secure, permanent accommodation. As referenced earlier in this section, it is also costly to the local authority.
- 3.30 Research by Shelter⁸ has shown that the use of TA has grown nationally through the pandemic, and the data would indicate that this is the case in Enfield too. Shelter found that more than 67,000 families spent the first lockdown trapped in temporary accommodation which is often camped, overcrowded and poor quality with 136,000 children living in these properties. Over a quarter of this accommodation is out-of-area, because Councils cannot find local accommodation, resulting in long commutes to work and school.
- 3.31 More than 18,000 families living in TA are accommodated by unregulated private companies in accommodation, which can consist of just one room with a basic kitchenette and tiny en-suite bathroom. Such accommodation is often overcrowded, and rarely has laundry facilities or WiFi. It rarely meets modern space standards, with children often required to share beds with parents or siblings; with families sometimes required to share bathrooms with others in the block. Overcrowding has also been linked to higher COVID-19 contraction rates, and those at the sharp end of the housing crisis are among those hardest hit by the virus.
- 3.32 These are serious issues which demonstrate the very clear social need to increase the delivery of affordable housing in the Borough to address this very real, local and live housing crisis.

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https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/briefing_homelessness_and_temporary_accommodation

The Projected Delivery of Affordable Housing

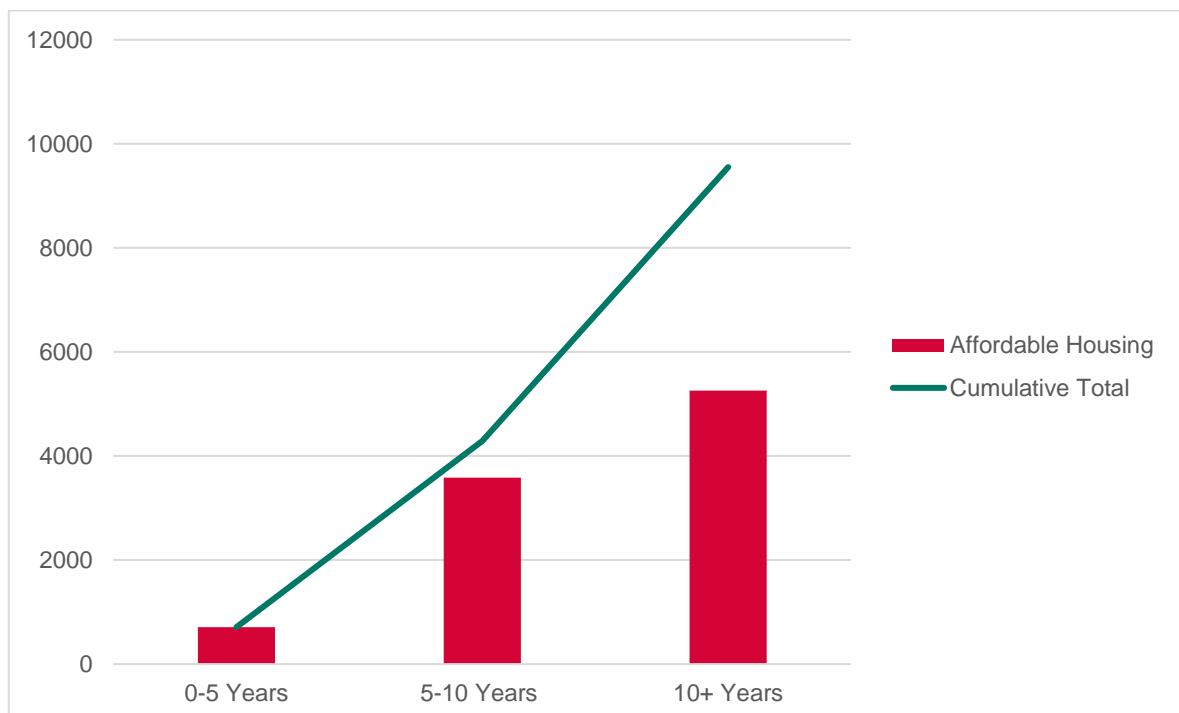
3.33 Looking forward at supply to address these significant issues in the Borough, Iceni has sought to develop our own affordable housing trajectory based on the Council’s allocations in the absence of one developed by the Council.

3.34 It should be noted that the limitations of this trajectory are (a) it is only for allocations not commitments and (b) it doesn’t take account of more precise delivery timescales, as we’re not currently in possession of these details. The trajectory reflects the policy requirements for affordable housing set out in draft policy in the emerging Local Plan, which comprise:

- 50% affordable housing on restate regeneration schemes and Council-owned sites
- 50% affordable housing on industrial land where net loss of industrial floorspace occurs
- 50% affordable housing in all areas of the Green Belt – including placemaking areas at Chase Park and Crews Hill
- 35% affordable housing on all other major housing development sites.

3.35 Applying these thresholds to the housing allocations and the expected yield, we have developed a trajectory which is summarised in the Figure below and attached in detail at Appendix AX. This shows that there is around 9,550 affordable homes in the pipeline – with the delivery of affordable housing rising overtime as some of the larger Green Belt sites begin to deliver.

Figure 3.6: Iceni’s Enfield Affordable Housing Trajectory, 5 YR Summary



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- 3.36 Acknowledging its limitations, the trajectory is clear in showing that the volume of affordable housing in the allocation development pipeline is (a) significantly short of the need for 25,326 affordable homes over the plan period; and (b) reliant on Greenfield sites such as Chase Park which provide for 50% of all housing as affordable on the basis of the draft policy thresholds.
- 3.37 Overall, it is therefore clear that in order to address the substantial issues surrounding homelessness and the reliance on TA in Enfield Borough, the release of Green Belt land including Chase Park is necessary to play a crucial role in boosting delivery of affordable housing. In the absence of Green Belt release, the Council will simply be unable to work towards reversing the trend of higher homeless acceptances, increasing numbers in TA and worsening affordability. This negative spiral needs to be addressed.

4. NEED FOR FAMILY HOUSING

- 4.1 The delivery of housing overall is clearly an important consideration for Enfield Borough Council in the context of the Government's objective to significantly boost the supply of housing; however, the mix of housing is also a key consideration. The Framework (paragraph 62) requires local authorities to not just assess the scale of need for housing but to first assess the size, type and tenure of housing needed for different groups in the community and then to reflect these in planning policies, including in the mix of sites which are brought forward.

The Need for Family-Sized Accommodation

- 4.2 The Council's emerging draft Local Plan and latest housing evidence, the Local Housing Need Assessment 2020 ("LHNA") produced by AECOM, both recognise that there is a substantial need for family-sized accommodation in the Borough. In the Council's Preferred Options version of the draft Local Plan (June 2021), the third strategic objective at Table 2.1 explicitly states that the Council will:

"protect family housing and support the delivery of new family homes to ensure that people who grew up in the Borough will have the opportunity to remain"

- 4.3 The Local Plan's review of the three growth options considered as part of forming the spatial strategy at Table 2.2 includes an assessment of the pros and cons of each with the first growth scenario delivering 17,000 homes, second growth scenario delivering 25,000 homes and the third delivering 55,000 new homes. This assessment of pros and cons is clear that in all options aside from the preferred option – which delivers 25,000 new homes and includes Green Belt release – the need for family housing and affordable accommodation will not be addressed.
- 4.4 The Council's spatial strategy is therefore focussed on providing for at least 25,000 new homes up to 2039 with a focus on delivering family and affordable housing 'at scale' in four main 'placemaking' areas – Meridian Water, Southbury, Crews Hill and Chase Park. It is clear from the Local Plan (at paragraph 3.10.6, Table 2.2 and Table 8.3) that Chase Park in particular has a key role to play in delivering 'high quality family accommodation' as well as 'much more affordable housing'.
- 4.5 In setting out the housing allocations under Policy H1, the Council notes that the anticipated distribution of housing will see around 30,000 new homes delivered to 2039. The Local Plan (paragraph 8.1.10) is clear that the approach of incorporating a small number of allocated Green Belt sites will specifically support the delivery of larger units and will increase the provision of affordable homes.

- 4.6 The draft Local Plan deals specifically with housing mix under Policy H3, and this is informed by the Council’s LHNA. The Policy sets out ‘dwelling size priorities’ across the three main tenures and this has been reproduced in the Table below for reference; demonstrating that three bedroom homes (family-sized accommodation) is the only size with a high priority across all tenures. There’s also a high priority for 4 or more bedroom homes in the market sector.

Table 4.1 Enfield Local Plan Policy H3, Dwelling Size Priorities

Tenure	Studio	1 Bed	2 Beds	3 Beds	4+ Beds
Social/Affordable Rented	Low Priority	Medium Priority	High Priority	High Priority	Low Priority
Intermediate	Low Priority	High Priority	High Priority	High Priority	Low Priority
Market	Low Priority	Low Priority	Medium Priority	High Priority	High Priority

Source: Enfield Local Plan, June 2021, Table 8.4

- 4.7 In the LHNA which underpins the policy in the draft Local Plan, it is clear that **most new households expected to form over the plan period are likely to need larger homes of 3 or more bedrooms** (i.e. family-sized accommodation). The modelling undertaken suggests the largest requirement in the market sector will be for 3 and 4 bedroom homes and in respect of the affordable housing sector, the LHNA sets out that the largest proportion of households require 2 and 3 bedroom homes.
- 4.8 The study is also clear that there is some demand from family households for larger intermediate properties, although the Council does not hold a waiting list of interested households to confirm the scale of demand. Through direct discussion with the Council’s housing team, we also understand that there is significant demand for larger, family-sized homes which are accessible/adaptable with the delivery of larger homes with level access enabling the Council to meet ‘an acute need’.
- 4.9 Bringing this together in terms of an output regarding housing mix, the LHNA sets out an estimated breakdown of the Council’s housing target of 1,246 homes by bedroom and tenure. This conclusions of the LHNA analysis are set out in the Table below and demonstrates that the demographic needs of new households are primary for 3 bedroom or more properties across both tenures. In other words, the latest evidence demonstrates there is a clear need for family housing.

Table 4.2 Enfield Housing Mix – Latest Evidence

	Market (No.)	Market (%)	Affordable (No.)	Affordable (%)
1 Bedroom	40	6	92	15
2 Bedrooms	137	22	220	35
3 Bedrooms	258	42	267	43
4+ Bedrooms	188	30	44	7

Source: Enfield LHNA 2020, Table 8.2

The Existing Housing Offer

- 4.10 An area's existing housing offer tends to influence the demand profile, both by influencing who moves locally and the types of buyers/renters who look for properties in an area.
- 4.11 Enfield has a relatively high proportion of owner occupiers when compared with London as a whole. 58% of households are owner occupiers, 22% private renters and 18% in the social rented sector (as at 2011).

Table 4.3 Enfield Tenure of Households

	Enfield		London	Inner London	Outer London	England
	Households	% of HH	% of HH	% of HH	% of HH	% of HH
Owned outright	31,452	26.2	21.1	14.1	26.2	30.6
Owned with mortgage	38,010	31.7	27.1	19.4	32.7	32.8
Social rented	21,073	17.6	24.1	32.8	17.8	17.7
Private rented	26,591	22.2	25.1	30.7	21.0	16.8
Other	2,790	2.3	2.6	3.0	2.0	2.1
Total	119,916	100.0	100.0	100.0	100.0	100.0

Source: 2011 Census

- 4.12 Generally, the size profile of housing in Enfield is one of larger homes; particularly when set against Inner London with an average of 2.6 bedrooms compared with 2.2 in Inner London. The average number of bedrooms is in line with the Outer London average.
- 4.13 In the Borough, 54% of households have 3 or more bedrooms (constituting family housing); compared with 46% across London. On the other hand, only 16% of households have 1 bedroom in Enfield whereas the figure is much higher in London at 22%; and higher still at 30.5% in Inner London. This highlights that within London's housing market, different boroughs have play different roles and **Enfield's role is clearly more centred on the provision of larger, family housing.**

Table 4.4 Enfield No of Bedrooms by Household

	Enfield		London	Inner London	Outer London	England
	Households	% of HH	% of HH	% of HH	% of HH	% of HH
1 bedroom	19,653	16.4	22.0	30.5	16.0	12.0
2 bedrooms	34,909	29.1	31.6	35.1	29.0	27.9
3 bedrooms	47,532	39.6	31.3	22.7	37.5	41.2
4 bedrooms	17,822	14.8	15.1	11.8	17.5	19.0
Total	119,916	100.0	100.0	100.0	100.0	100.0
Avg. Bedrooms	2.6		2.5	2.2	2.6	2.7

Source: 2011 Census

Housing Demand for Flats/Homes

- 4.14 HM Land Registry provides data on the volume of transactions in any given year at the Borough level; with detail provided on the type of development involved in those transactions. In considering the latest available data over the period from 2014-2020; a clear picture can be drawn. The results of this analysis are shown in the Table below.

Table 4.5 Transactions by Type in Enfield - 2014-2020

	Detached		Semi-Det		Terraced		Flatted		All
	No.	%	No.	%	No.	%	No.	%	No.
2020	115	6	392	21	775	42	554	30	1,836
2019	129	5	489	21	908	39	821	35	2,347
2018	115	5	405	17	996	42	878	37	2,394
2017	111	4	469	18	1,030	39	1,026	39	2,636
2016	156	5	517	17	1,140	37	1,253	41	3,066
2015	146	4	623	18	1,324	38	1,418	40	3,511
2014	188	5	607	16	1,341	36	1,556	42	3,692
Avg. (p.a.)	137	5	500	18	1,073	39	1,072	38	2,783

Source: HM Land Registry; note that percentages may not equal 100% due to rounding

- 4.15 The analysis shows that across the seven year period, 62% of total transactions of homes being bought and sold in Enfield related to houses with only 38% related to flatted development. The greatest proportion of transactions was seen in those buying terraced properties. In 2020, the proportion of transactions weighted towards houses was even greater at a split of 70% to 30%. This is an expression of market demand.
- 4.16 Although sales overall have decreased, over the seven year period, the proportion of sales attributed to flatted development decreased by 12 percentage points whereas the Borough experienced transaction growth of 6 percentage points for terraced properties and 3 for semi-detached. This provides clear evidence of the profile of demand for housing.

Types of Homes being Delivered

- 4.17 The Council's Annual Monitoring Report ("AMR") for 2019/20 is the latest available. The AMR provides monitoring data on gross housing completions by bedroom size in the Borough. The analysis demonstrates that across all housing tenures; the supply of smaller properties has significantly outstripped the supply of larger, family-sized housing.
- 4.18 This is despite a requirement under Core Policy 5 for 70% of market housing to be delivered with 3 or more bedrooms and 60% of social rented housing with 3 or more bedroom homes. The analysis is shown in the Table below:

Table 4.6 Gross Completions by Tenure and Bedroom Size in Enfield

Year	1 Bed		2 Beds		3 Beds		4+ Beds		All
	No.	%	No.	%	No.	%	No.	%	No.
2019/20	188	40	216	47	56	12	5	1	465
2018/19	128	21	140	23	207	34	128	22	603
2017/18	154	28	260	47	100	18	40	7	554
2016/17	453	45	279	28	175	17	102	10	1,009
2015/16	272	34	282	35	162	20	83	10	799
2014/15	174	36	181	38	89	19	33	7	477
2013/14	260	36	315	43	102	14	49	7	726

Source: Enfield Annual Monitoring Report 2019/20

- 4.19 Over the seven year period, the trend towards the delivery of smaller units is evident – particularly one and two bedroom units. The analysis shows that these smaller properties accounted for 71% of all housing delivered whereas family-sized housing with three or more bedrooms has accounted for just 29% of new housing. In 2019/20, one and two bedroom homes made up a significant 87% of the total housing completions with only 5 homes provided with 4 or more bedrooms.
- 4.20 Notably, this is in direct contrast to the transactions data drawn from HM Land Registry – with demand heavily focussed on housing (particularly in the latest monitoring year) - as well as the profile of housing need set out in the Council’s own evidence, which shows a clear need for family-sized accommodation.
- 4.21 This profile of housing delivery is also in contrast to the existing profile of housing in the Borough which is evidently geared more towards family housing; indicating a disproportionate level of growth in smaller properties relative to the characteristics of and need for housing in the Borough.
- 4.22 Although the Council no longer publishes data in the same level of detail, historic AMRs have set out completions data broken down by tenure, type and size which provide further insight into the nature of development in the Borough. This data is set out in the Table below for reference.

Table 4.7 Gross Completions by Tenure and Bedroom Size in Enfield, 2013-16

	Tenure	1-2 Bed Flats		3 Bed Flats		2 Bed Houses		3+ Bed Houses		All
		No.	%	No.	%	No.	%	No.	%	
2015/16	Market	449	67	79	12	10	1	133	20	671
	Social Rent	14	52	0	0	4	15	9	33	27
	Intermediate	55	74	19	26	0	0	0	0	74
	Affordable Rent	18	86	3	14	0	0	0	0	21
	Total	536	68	101	13	14	2	142	18	793
2014/15	Market	273	74	36	10	13	3	47	13	369
	Social Rent	18	53	3	9	0	0	13	38	34
	Intermediate	31	88	1	3	0	0	3	9	35
	Affordable Rent	8	50	7	44	0	0	1	6	16
	Total	330	73	47	10	13	3	64	14	454
2013/14	Market	297	73	41	10	11	3	56	14	405
	Social Rent	93	76	12	10	0	0	18	15	123
	Intermediate	174	95	10	15	0	0	0	0	184
	Affordable Rent	-		-		-		-		
	Total	546	86	63	7	11	2	74	6	694

Source: Enfield AMR 2017; note no data is available for affordable rented properties in 2013/14

- 4.23 The analysis shows that as a proportion of total completions in 2015/16 in the Borough; 81% of completions were for 1, 2 and 3 bed flats. 18% of completions were for houses of bedrooms or more; with only 2% of total completions 2 bedroom houses. Similarly, in 2014/15, 83% of completions were for flatted development. This provides further evidence that housing delivery has not matched demand in recent years in the Borough.
- 4.24 Looking forward, the Council is clear in its own Local Plan (paragraph 8.1.11) that it expects this trend to continue with a high proportion of developments in urban areas coming forward in the form of flatted developments. The Council is therefore reliant on greenfield developments to deliver more family housing.
- 4.25 Critically **without Green Belt development the Council will not be able to meet the type/mix of homes which is needed – which is clearly focused on family housing – and which the evidence clearly indicates is not being delivered through brownfield sites.**

The Solution

- 4.26 In line with the Framework’s sequential approach to the release of Green Belt land; once Brownfield options have been exhausted and are not sufficient to deliver the quantum and type of housing requirement, we should look towards the opportunities on greenfield sites which cannot typically be mirrored on brownfield land.

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- 4.27 As is clear from our analysis in this section, it is important that type of land brought forward for development responds to the characteristics of housing need and local markets across Enfield Borough which is evidently focussed on family housing. There is a need for sites which can deliver flatted development; however, there's also a clear need to provide for first-time buyers, family households with children and couples in Enfield looking for larger 3 and 4 bedroom housing.
- 4.28 In an Enfield context, the only way this can be achieved is through the release of Green Belt land such as Chase Park. The ability to deliver the right type of homes, which is principally family-sized accommodation, is therefore a key component of the Council's overall exceptional circumstances case.

5. SUMMARY AND CONCLUSION

- 5.1 Fairview New Homes is one of a number of parties which is promoting development of land at Chase Park, Enfield through the Local Plan process. As the land falls within the Green Belt, it is therefore necessary to demonstrate 'exceptional circumstances' for the alternation of the Green Belt boundaries through the plan-making process. These exceptional circumstances can be made up of an accumulation of factors including the scale of need, inherent constraints to delivery, and the need for particular types of housing.
- 5.2 This report has undertaken analysis around the Borough of Enfield's need for housing – in terms of the quantum of affordable housing, as well as the type and mix of housing overall – as well as the challenges around homelessness to inform consideration of the exceptional circumstances case justifying the release of Green Belt land through Enfield's Local Plan.
- 5.3 There is a clear quantitative case for Green Belt development both across London and in Enfield. The Secretary of State has identified the housing need as acute. There is a substantial shortfall of over 33,000 homes a year across London; and the London Plan Inspector's Report specifically identifies that considering Green Belt development is a logical step to close the gap. In Enfield the urban capacity falls well short of meeting overall housing needs, with in particular a very limited land supply post 2033.
- 5.4 In terms of affordable housing need, the report draws on Enfield's Housing and Growth Strategy 2020-30 which identifies a housing market in crisis with too few social and affordable rented homes and a growing number of people in low incomes forced to live in the PRS where rents are rising, homes are unaffordable and there is insecurity of tenure and in many cases unacceptable housing standards.
- 5.5 The scale of affordable housing need in the Borough has been quantified in the Enfield Local Housing Needs Assessment which identifies a need for 1,407 affordable homes per annum. Set against this, recent average delivery of only 121 homes per annum over the 2014-20 period. Taking this average means that the needs of around 91% of households needing affordable housing are not being met – a position which is clearly significant and one which the Council itself sets out is worsening. The situation is chronic.
- 5.6 The implications of this are evidenced in the scale of the homelessness challenge in the Borough. Icení's own analysis of homelessness data shows that homelessness has increased significantly over the last decade and although this has been the case nationally and in London generally, the rate of growth in Enfield has been exceptional - the Borough has experienced a 246% increase in homelessness acceptances between 2010 and 2017 compared with a 35% rise in London. A

substantial 1,842 households were owed a duty in 2020/21. These are real households in need of homes now.

- 5.7 Through discussions with the Council's housing team, we understand that the growth in Enfield over the last decade has been particularly acute owing to many households in poverty with low financial resilience living in the PRS – which the Council is heavily reliant on due to a lack of social housing stock. The Borough has the second highest eviction rate in London and applicants are caught in a cycle between homelessness, TA and the PRS which is worsening year-on-year.
- 5.8 The acute housing crisis evident in the Borough means that the Council has the second highest number of households in Temporary Accommodation in the country and in the year ending 31st March 2021, there was a total of 3,442 households in TA. This has grown substantially from around 2,000 households over the last decade. As the Council is heavily reliant on the PRS to discharge its housing duty; and it does so principally through nightly paid accommodation, the cost is significant at around £7.9m per annum in net terms.
- 5.9 Crucially, of those households living in TA in the PRS, 40% would be subject to the benefit cap if they moved into permanent housing in the PRS; which is a major barrier to accessing suitable permanent housing. According to the Council's Homelessness Strategy, Enfield has the fifth highest number of households impacted by the benefit cap nationally. This means many households, including over 4000 children, are trapped in temporary accommodation. The only solution is to deliver new affordable housing, and in particular larger affordable homes, and this will not be achieved without Green Belt development. The Council simply can't deal with this acute need without substantially boosting the delivery of affordable housing.
- 5.10 Icenl has sought to develop an affordable housing trajectory which forecasts the scale of affordable housing delivery expected through the draft Local Plan's housing allocations. This shows that the allocation development pipeline is (a) significantly short of the need for 25,326 affordable homes over the plan period; and (b) reliant on Greenfield sites such as Chase Park which provide for 50% of all housing as affordable on the basis of the draft policy thresholds.
- 5.11 It is clear that in order to address the substantial issues surrounding homelessness and the reliance on TA in Enfield Borough, the release of Green Belt land including Chase Park is necessary to play a crucial role in boosting delivery of affordable housing. In the absence of Green Belt release, the Council will simply be unable to work towards reversing the trend of higher homeless acceptances, increasing numbers in TA and worsening affordability.
- 5.12 The report also demonstrates that there is a disparity between the existing profile of housing stock, the evidence of housing need and market demand, and the recent trends in housing completions and the housing land supply moving forward. Whilst the profile of housing need in the Borough is

focused towards provision of family-sized accommodation; recent delivery and pipeline supply are not meeting this need – principally due to the brownfield urban nature of the sites where flatted development is the focus. More than 80% of new homes delivered in recent years have been in flats. It is clear that the only way more family-housing can be delivered is through the release of Green Belt land such as Chase Park; which offers an opportunity to deliver a mix of sizes, types and tenures which cannot be achieved on brownfield sites where building at higher density is the focus. The Green Belt has evidently be constraining the ability to meet housing need.

- 5.13 In conclusion, there is a clear quantitative need for additional housing and gap between overall housing need and the supply which can be achieved from urban / brownfield sites. The differential is particularly acute beyond 2030. Furthermore it is only through releasing Green Belt land that the Council will be able to deliver the necessary scale of affordable and family-sized housing that is required to address issues around affordability and homelessness and deliver the right type of homes in the Borough to meet acute needs. These factors combined and together contribute to a compelling exceptional circumstances in Enfield Borough to justify the release of Green Belt land.

A1. ENFIELD: AFFORDABLE HOUSING TRAJECTORY