



COMMITTEENAME

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members
and operational key decision makers.

Once signed all decisions will be published on the Council's
Publication of Decisions List.

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London Borough of Enfield**Portfolio Report**

Report of: Joanne Drew, Director of Housing and Regeneration
Vincent Lacovara, Head of Planning

Subject: **Housing Delivery Action Plan 2022**

Cabinet Member: **Cllr Caliskan, Leader of the Council**

Executive Director: **Sarah Cary**

Ward: **All**

Key Decision: **KD 5422**

Purpose of Report

1. The Housing Delivery Test (HDT) is a Government measure of housing supply. The results of this test are reported annually.
2. The latest round of HDT results were published in January 2022, which like a number London Boroughs, and in line with the context above, places Enfield Council in the category of “presumption in favour of sustainable development” meaning that proposed developments should be granted planning permission unless their adverse impacts “significantly and demonstrably” outweigh their benefits.
3. As required an Action Plan has been produced which sets out what steps the Council will take to improve the delivery of new homes in the borough in support of its corporate plan and good growth housing strategy.

Proposal

4. Approve the HDT Action Plan attached as Appendix A for publication on the council’s website and for implementation.

Reason for Proposal

5. To meet the requirements of national planning policy, that within six months of the results being published the Council should publish an action plan.
6. To promote the importance of housing delivery across all stakeholders and the need to continue to embed a culture of positive growth supported by timely planning decisions.

Relevance to the Corporate Plan

7. The Housing Delivery Action Plan (Appendix A) helps to improve the delivery of housing and key issues that may affect slower delivery rates for housing in London and the borough.

Background

8. A number of changes to the planning system were introduced through the publication of the new NPPF in July 2018, one of which was the introduction of a new monitoring tool (the Housing Delivery Test) to assess housing delivery against housing requirements. In instances where local planning authorities do not deliver 95% their housing requirements in the preceding three years, they are required to produce an Action Plan detailing how they intend to improve housing delivery going forward.
9. This version of Enfield's Housing Delivery Action Plan has been produced in response to the 2021 HDT results released in January 2022 where it was highlighted that the Council had met 67%¹ of its housing requirements over the last three years. Previous versions were published in 2019 (KD 2996), in 2020 (KD 4996) and in 2021 (KD 5272).
10. The 2021 results place Enfield Council in the *Presumption in Favour of sustainable development* category, which has wider implications for how the Council, acting as local planning authority, makes decisions and for our residents in terms of where homes are built. By invoking the Presumption in Favour of sustainable development, applicants will be able to submit proposals which are considered to be in accordance with planning policies, despite any officer and member concerns.
11. The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to identify a supply of development sites sufficient to meet five years' worth of local housing need. In Enfield's case, where it is unable to demonstrate a five-year supply of housing land, the NPPF states that their planning policies that are "relevant ... to the supply of housing" should be considered to be out of date. The presumption in favour of sustainable development then applies to both plan-making and decision-taking.
12. If applications are refused or deferred at planning committee or by delegated authority, the applicant could seek to appeal. With the HDT measure applied as material weight, this is likely to mean a higher volume of planning decisions being overturned if the proposal is considered appropriate development in line with relevant policies. This presents a financial and reputational cost to the Council.
13. A copy of the Enfield Housing Delivery Action Plan 2022 is attached at **Appendix A**. This Action Plan sets out the measures which the Council will be taking to identify and promote more landowners to bring forward sites for development, increase the number of applications and improve the rate of build out.

Main Considerations for the Council

14. The Council does not have full control over the development system and therefore will continue to lobby the Government for the support and interventions to:
 - (1) ensure that Enfield is properly funded to provide the stable foundations to deliver good growth by:
 - Backing the Fair Funding regime addressing long standing funding shortfalls
 - Ensuring that any changes to infrastructure funding through the new planning regime reflect the need for councils to invest upfront to support growth rather than as is proposed, seeking to mitigate developer risk through lag funding following sales

¹ published by the Secretary of State in January 2022

(2) reform aspects of the current and proposed housing system that impact on securing good growth:

- Recognising the market failure in London (high prices, low wages in relation to house prices and high demand) and the case for additional funding for affordable housing enabling Enfield and its housing association partners to deliver new supply at the scale and pace required
- Enable increased local discretion on the right affordable products recognising the affordability barriers of First Homes and the increased viability pressures arising from the reformed shared ownership product.
- Support ambitious councils to bring more land into the system, through infrastructure funding and cross-boundary technical support
- Require developers to build out approved schemes to secure the anticipated pipeline.

(3) invest in the skills and supply chains to deliver the requirements of the Future Homes Standard so that the pace of delivery is not affected by the complexity of new requirements or the higher costs of early adoption.

15. During 2020/21 the Council has continued to promote our direct delivery schemes despite recent economic difficulties with schemes progressing through design to planning and maintaining our contractors on site, to build out homes at pace. In the past year, we have submitted planning applications for over 333 homes, with completions expected by 2024.

16. Overall good progress has been made against 2021 Action Plan, with the majority of actions implemented and a renewed focus in ensuring outcomes are achieved and measured. The summary is provided in **Appendix B**.

17. In addition to the progress made on direct delivery the Council delivered the following against the previous action plan the following are notable outputs from last year's Action Plan:

- Increase in the number of major dwellings planning decisions in 2021
- Appointment of two Housing Enabling Managers focussed on unlocking stalled sites and improving overall data monitoring on supply
- Identification of 100 units across small sites for delivery in next two years
- Promotion of custom-build sites with three sites identified and in live planning, with works due to commence in 2023
- Acceleration of large regeneration schemes – Alma, New Avenue and Meridian Water

18. The 2022 action plan has identified the following five key strategic priorities, which have been rolled forward or further defined for the next delivery period:

Priority	Key output	Driver for change
Local Plan	Progress the Local Plan to its next stage as set out in the Local Development Scheme	Clarity to the sector and housing market on site allocations and land use will help promote more developments
Development Management process	Increased number of pre-applications received and determined in a single year.	Planning performance will create confidence in the market and attract more investors to unlock supply

Increased build out of consented schemes	Improved build out rates for construction, delivery of unimplemented permissions and completions.	Construction activity creates competition and increase supply of homes for local residents
Market-led interventions and land release	Increased new developer-led entrants into the local market and reduction in speculative land trading, where possible. Developers and landowners forums for housing development utilising expertise from the private, housing associations and local agents to identify barriers to delivery and the role of our planning service in that process.	Use of council's leverage will improve delivery, ranging from how assets are disposed, acquired or built to offset slow paced delivery led by private sector.
Council-led housing delivery	Accelerated delivery of council-owned sites and developer-led regeneration to strengthen the role the council has and continues to play in the local housing market.	More affordable homes are needed to improve the availability and access to homes by local residents

Safeguarding Implications

19. There are no safeguarding implications arising from this report.

Public Health Implications

20. The plan to improve delivery of housing in view of the shortfall in delivery over the last three years will likely have a positive impact on the public's health. We know that people experiencing homelessness have a life expectancy 30 years less than the general population and poor housing has a significant impact on mental health and wellbeing. The Building Research Establishment Trust recently estimated that poor housing costs the NHS at least £1.4 billion per year. Housing is therefore fundamental to health and delivery of new housing in response to the demand is necessary to improve the borough's health outcomes.

Equalities Impact of the Proposal

21. In preparing this report a screening Equalities Impact Assessment (EqIA) was completed which identified that the approval of the Housing Delivery Action Plan is not relevant to the PSED. An EqIA will be completed on individual schemes or proposals to ensure that the PSED is met when designing and delivering the programme.

22. Future individual schemes or considerations may well be subject to appropriate review to ensure they comply with latest equality legislative need. Any risks and opportunities identified will also be subject to assessment for impact on those that share a protected characteristic.

Environmental and Climate Change Considerations

23. The Housing Delivery Action Plan reports on the measurement of the HDT and sets out actions to promote housing growth. It will have indirect environmental implications as it seeks to facilitate and, where appropriate, accelerate delivery of housing sites across the borough and inform the new Local Plan. In 2018 residential buildings accounted for 39% of borough-wide carbon emissions so, whilst the need for new housing is a key priority, it should be sustainable and be delivered following good growth principles.

Risks that may arise if the proposed decision and related work is not taken

24. National policy states that an Action Plan, when required should be produced within six months of the HDT results being published. However, there is presently no indication as to any sanctions or penalties that might apply if this requirement is not met. Notwithstanding this point, this is not considered an appropriate course of action and the activities outlined in the action plan are necessary to improve overall supply in the borough.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

25. There are no direct risk implications arising from this report. However, sustainable development of the borough and the preparation of the Local Plan are both corporate risks. The Housing Delivery Action Plan includes proactive measures to help address these to maintain quality developments despite the need to apply presumption in favour of development.

Financial Implications

26. The action plan includes will be delivered through existing services, as well as new commitments, some of which will also result in increased income such as planning fees.

Legal Implications

27. Paragraph 76 of the National Planning Policy Framework 2021 states that where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authorities housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance.
28. Paragraph 052 of the housing delivery and supply guidance (ID: 68-052-20190722)² states that the action plan should be published within 6 months of the publication of the Housing Delivery Test results.
29. Enfield's delivery is 67% of its housing requirement and therefore an updated Housing Delivery Test Action Plan should be published and will be a material consideration in the determination of planning applications.

² <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test--action-plans>

30. The recommendations set out within this report are within the Council's powers and duties.

Workforce Implications

31. A number of appointments have been made within the planning service since the implementation of the directorate restructure in 2018. Workload and vacancies are monitored on an on-going basis against operational and financial requirements.

Property Implications

32. Given the high-level, general perspective of this report in relation to corporate property matters, there are no immediate property implications. However, as the action plan is implemented over time, there is the possibility of property implications arising on specific projects and actions as they pan out. These will be addressed as necessary and as they come forward in future reports.

Other Implications

33. The Coronavirus pandemic has had unprecedented impact on the planning and construction industry and this is likely to continue for some time, with housing delivery likely to be delayed or stalled.

34. The Housing Action Plan is a measure placed on the council for failing to meet the housing delivery threshold set in the Housing Delivery Test. The Housing Action Plan emphasises the need to deliver a new Local Plan as a priority. Therefore, the Enfield new Local Plan is critical to ensure sustainable growth is planned and fundamental in ensuring corporate priorities are delivered.

35. There is no requirement to consult on the Housing Delivery Action Plan.

Options Considered

36. The option of not preparing an updated action plan was rejected as this would not meet the requirements of the National Planning Policy Framework 2021.

Conclusions

37. The Housing Delivery Action Plan is a necessary response to the shortfall in the delivery of housing over the last three years and a housing system that is not adequately supporting supply. In summary, government regulations require local authorities to publish their Action Plans. This report therefore seeks approval for the publication of the Council's Housing Delivery Action Plan as set out in **Appendix A**.

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Date of report: April 2022

Appendices

- **Appendix A** Enfield's Housing Delivery Action Plan 2022 (attached)

- **Appendix B 2021** Action Plan Performance (below)

Appendix B : 2021 Action Plan performance (incomplete actions will be rolled forward in 2022 Action Plan where relevant)

Thematic Priority	Actions	Service Area	Completion
Effective development management process	<ul style="list-style-type: none"> • Improve the pre-application process ensuring clear guidance, feedback response times and develop planning statement which set principles and parameters for development. • Maintain the timeliness of determination period • Translation of grant of planning into start of construction – in London only X% of permissions lead to construction. • Update the standard planning application checklists • Training for planning service, including planning committee members, to understand development cycle and viability • Introduce a standard S106 Agreement Template to facilitate faster determination of planning applications • Review and update standard planning conditions and review their timing and use. Produce • Design Code for development, with a focus on offsite construction 	Planning	80%
Embedding housing delivery and growth as a key priority of the Council	<ul style="list-style-type: none"> • Approve Housing Delivery Test Action Plan and promote it to relevant staff, councillors, partners and other stakeholders Housing Delivery Strategy which addresses other delivery challenges than supply of numbers and promote it to relevant staff, councillors, partners and other stakeholders • Set up cross departmental Housing Delivery Group including membership, terms of reference, decision making. Increase transparency on performance of planning committee focussed on key indicators for HDT (permissions granted, conversions to delivery etc) Compile housing development programme register of all sites and sites above 100 units. Use Supply database to monitor progress from pre-app to completion on a quarterly basis and to identify delivery barriers and interventions required 	All	80%
Effective data analysis and monitoring of housing market and supply	<ul style="list-style-type: none"> • Maintain Brownfield Land Register • Maintain Custom & Self-Build Register, identifying opportunities for delivery • Review stalled sites in housing land supply to identify any potential sites that could be unlocked • Establish number of empty homes and actions to bring them back into use • Review the system of developer viability assessments, monitoring progress and considering a 	Planning / Housing	50%

	<ul style="list-style-type: none"> range of initiatives to better appraise Viability Assessments Develop empty Homes register 		
Efficient Local Plan and unlocking housing through infrastructure	<ul style="list-style-type: none"> Progressing the Draft Local Plan 	Planning	100%
Strengthening Council-led market interventions	<ul style="list-style-type: none"> Establish RP development forum Develop partnership approach with RPs, developers and pension funds to invest Support SMEs to secure land for development Develop other partnership routes including JV companies; in addition to those already established to support delivery Develop partnership approaches with custom build developers to improve housing offer Identify opportunities and develop approaches for self- build/ serviced plots Consider MMC/off site/modular planning strategy Develop pipeline for land disposals and review General Fund appropriation for residential Acquire more land for future housing development Maximise Government & GLA funding to assemble, de-risk land and provide infrastructure to unlock land for housing 	Housing	60%
Proactively pursuing housing delivery across range of providers	<ul style="list-style-type: none"> Set up an external Housing Delivery Forum with a range of agents - developers, contractors, RPs accessing funding to assemble and de-risk sites Develop partnership approach with RPs and developers with pension funds to invest Support SMEs to develop small sites Release more land for future housing development Maximise Government funding to assemble, de-risk land and provide infrastructure to unlock land for housing 	Housing	50%
Lobbying government to create the right conditions for development	<ul style="list-style-type: none"> Financial proposal to government and GLA for capital grant to unlock delivery and derisk future supply Develop collaborative strategies with local, central and London Government to reduce land banking, using GLA land fund to acquire stalled sites. Develop local strategies in line with the White Paper for planning. 	Housing	50%

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Enfield Housing Delivery Action Plan 2022

May 2022



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1 Introduction

This Housing Delivery Test Action Plan has been produced in response to the policy requirements of the Housing Delivery Test. Enfield's housing delivery falls short of the government's test, placing the Council in the Presumption in Favour of development¹ category which requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5 year housing land supply which is monitored through the AMR. This Action Plan drives the improvement of housing supply from what has been achieved so far and aims to tackle the drivers of change for the future. This year's report highlights that during 2020/21 there was an improvement on last year's position but overall there remains a shortfall against the housing requirement.

As noted in last year's report (published February 2021) there are a set of issues that had an impact in Enfield which, along with housing supply having been largely left to the market, is resulting in the delivery of new housing not matching pace with local plan targets and is far away from housing need.

The Building Environment Committee on Meeting Housing Demand² has commented *"Spending on planning has fallen by 14.6% since 2010 causing delays, issues with recruitment, and staff shortages in many authorities. Any new planning system will only work if local planning authorities have the resources and staff to implement it."*

That said the economic impact of the pandemic including rising inflation bearing down on labour and material supplies and the recent obligation on developers to remediate building safety defects, along with the continuing unclear position about planning reform means that housing supply is constrained by these uncertain times.

Enfield continues to tackle the position head on. With a Corporate Plan³ and a Housing and Growth Strategy⁴ which puts good growth at its heart, work has progressed to ensure services are funded including through the introduction of applicant funded pre-planning advice. The skills and capacity of the planning service has been enhanced and improvements have been made to the planning process.

Enfield's two-year average on the determination of major planning applications from June 2019 to June 2021 was 90.6%, marking an improvement both on overall performance and London ranking on the previous rolling 2-year period. Importantly, the two-year average exceeded the Council's own 90% target resulting in Enfield's performance for the period as 23rd best of the 33 London boroughs with an average slightly below the London average of 91.3% but above the national average of 88.3%

Over the past three years, approximately 800 homes delivered in this report period, has been driven by the Council – for example through its partnership regeneration schemes. With more control and direct investment in growth and by acting as master developer to ensure delivery of 10,000 homes on Meridian Water, enabled by the lifting of the HRA debt cap in 2018, the Council has launched its ambitious direct delivery programme to deliver 3,500 homes by 2035.

¹ Presumption in Favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or where the policies which are most significant for determining the application are out-of-date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

² House of Lords – published 10th January 2022

³ <https://new.enfield.gov.uk/services/your-council/enfield-council-plan-2020-to-2022-your-council.pdf>

⁴ <https://new.enfield.gov.uk/services/your-council/housing-and-growth-strategy-2020-2030-your-council.pdf>

This demonstrates that when enabled to do so with the right funding and powers Councils can take the driving seat in delivering growth.

The Council is planning for further growth and development, but a key corporate priority is to ensure that growth is appropriately located and managed through the preparation of a new Local Plan. Quality developments being brought forward by developers that match the Council's vision for Enfield as a place are being supported and more are needed.

2 Housing Delivery Test

In the period 2018/19 to 2020/2021, the Council has met 67% of its housing target delivering 853 homes. This is an improvement on the previous year (429 completions) despite challenging market conditions and the impact of Covid-19. Additionally, against the in-year target for 2021 the number of homes delivered exceeds the required homes. However, as delivery across three years is below the Government's 75% requirement, this places the Council in the Presumption in Favour of development⁵ category which requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5 year housing land supply which is monitored through the AMR.

Where this presumption applies, local authorities must grant planning permission for proposals which accord with an up-to-date development plan, without delay. They must also grant permission where there are no relevant or up-to-date plan policies, unless specific National Planning Policy Framework policies protecting areas or assets provide a clear reason for refusal or there are adverse impacts that outweigh the benefits of the proposal.

The buffer is now a requirement for the Council's five-year housing land supply due to the Housing Delivery Test 2020 measurement showing delivery was 56% of the housing targets for the period 2017/18 to 2019/20. Against the 1,246 new homes per year GLA target in 2020/21, 853 net additional homes were delivered.

In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 we met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes and in 2020 we met 56% of the 2,328 homes target for the three-year period delivering 1,314 homes.

Table 1 – Housing Delivery Test: 2021 Measurement

	2018/19	2019/20	2020/21	Total	HDT 2021 Measurement	HDT 2021 Consequence
No. of homes required	798	1022	830	2650	67%	Presumption in favour of development
No. of homes delivered	496	429	853	1777		

⁵ Presumption in Favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or where the policies which are most significant for determining the application are out-of-date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

3 Housing Delivery performance

Overall in 2020/21, there has been an increase in residential completions which can be largely attributed to:

- Build out of multi-phased Council led schemes such as Electric Quarter, the Alma Estate, New Avenue and Ladderswood, which were granted permission in previous years and phases completions occurred in this reporting period. The build out rate averaging at 24 months per phase. There are another 500 new homes targeted to be delivered across the remaining phases by 2027.
- Completions of two care homes.



Electric Quarter Phase 1 completed in 2021

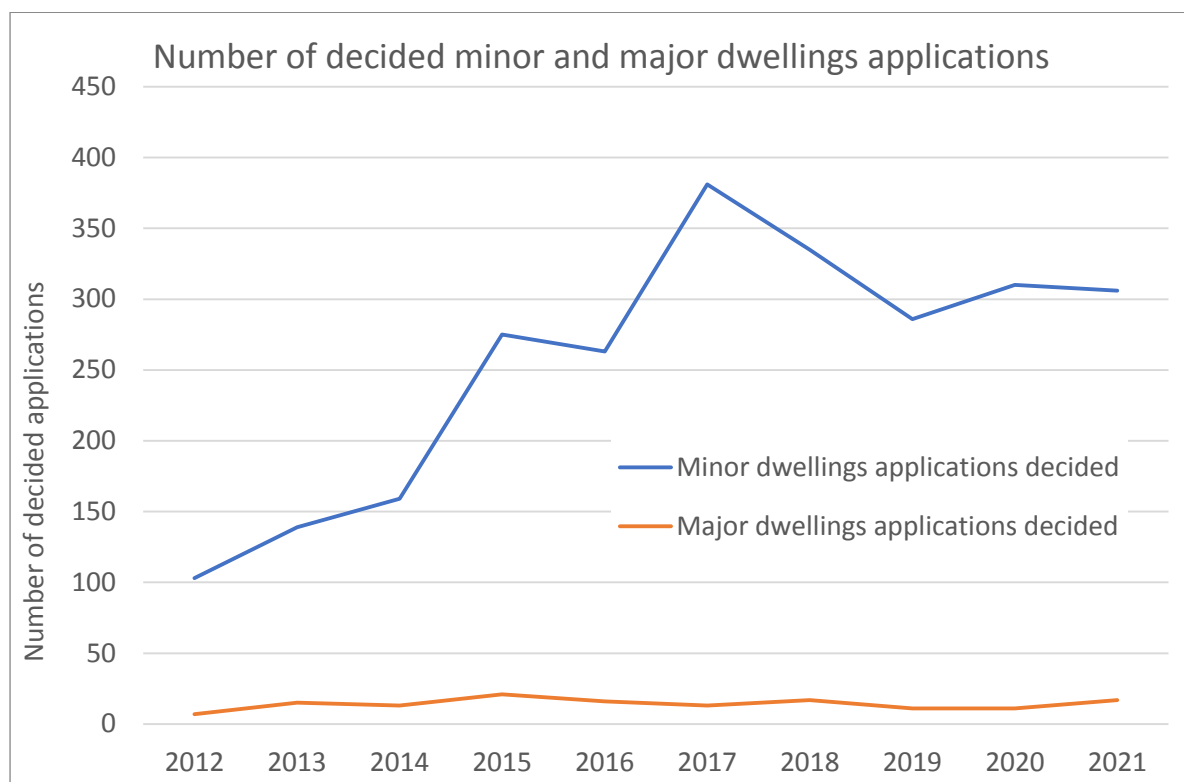
4 Planning decisions performance

Number of minor and major dwellings decisions

The number of decided minor dwellings planning applications in calendar year 2021 was 306 and it is slightly lower than the previous calendar year's 310. However, those figures are higher than Enfield recorded in 2019. This is despite adverse impact of Covid-19 on the Local Planning Authority's staffing levels.

The number of major dwellings planning applications decided in the calendar year 2021 was 17 and this figure is higher than the previous two year's recorded major dwellings decisions.

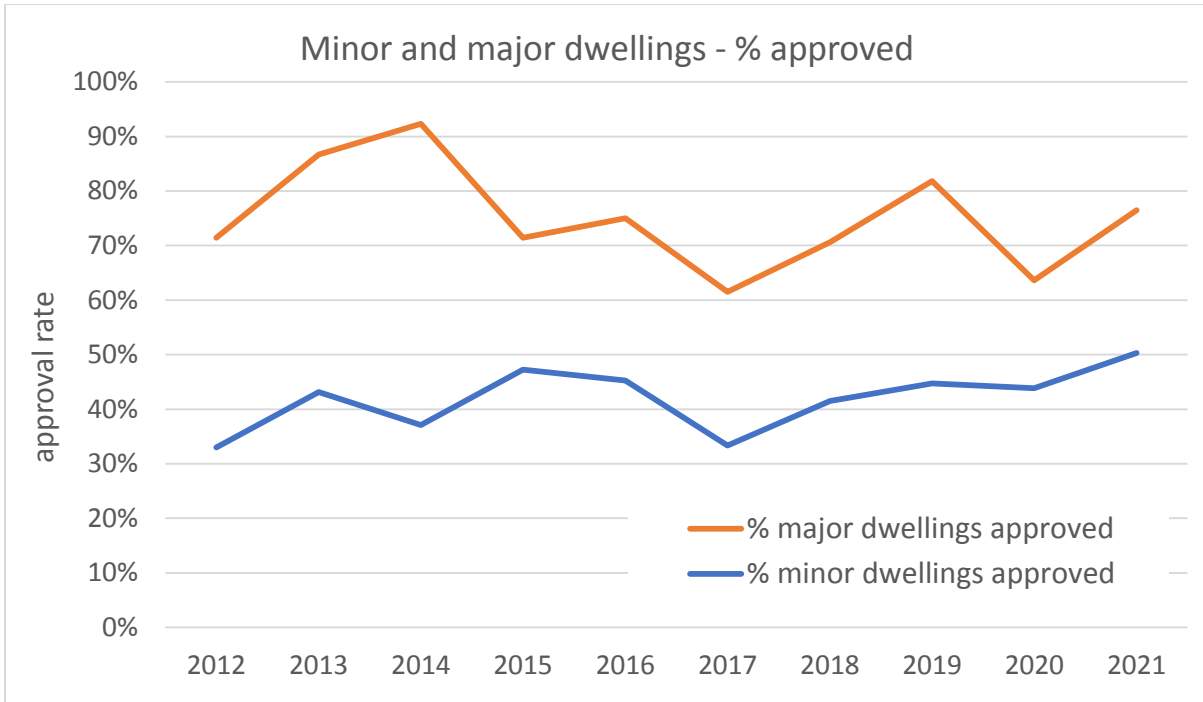
Table 1 below shows the number of minor and major dwellings applications decided in the previous ten-year period. Source District Planning Applications PS2 tables⁶.



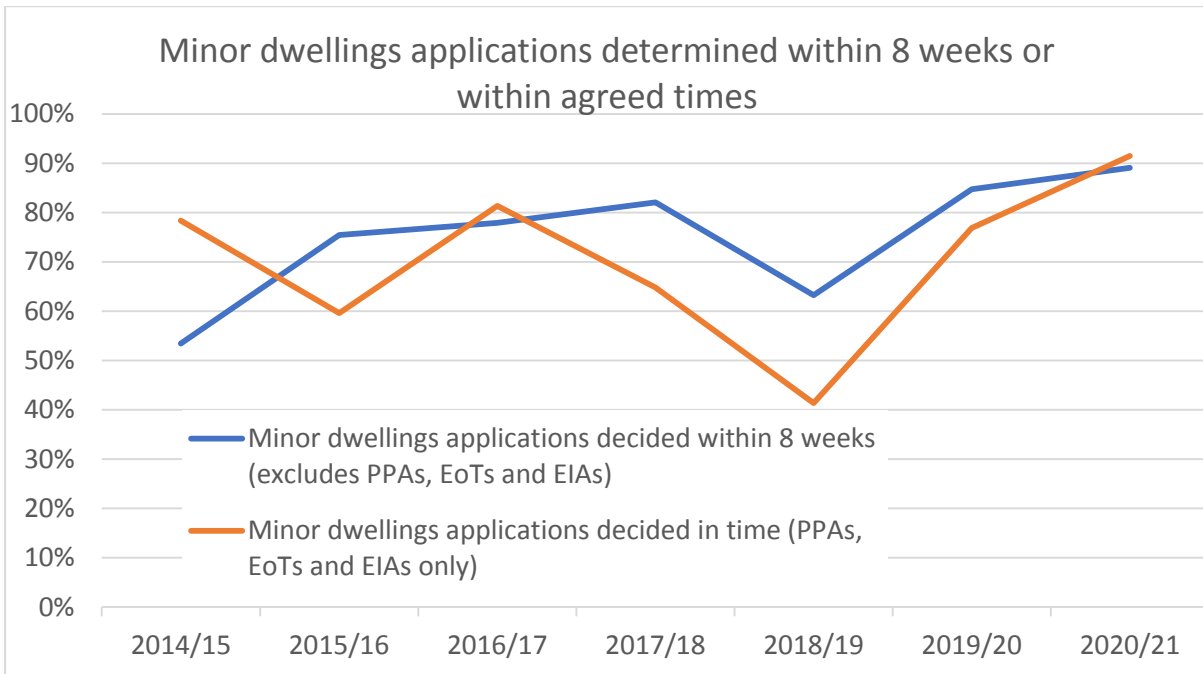
Approval rate

The approval rate for both the minor and major dwellings applications increased in calendar year 2021. Of particular note is that over the past four years the percentage of minor dwellings applications which were approved steadily increased from 33% in 2017 to 50% in 2021.

⁶ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>



According to the published PS2 tables in 2020/21, 89% of minor dwellings applications without planning performance agreements (PPAs), extensions of time (EoT) or environmental impact assessments (EIA) were determined within the 8-week statutory period. 91% of minor dwellings applications with PPAs, EoTs or EIAs were determined within agreed times with the applicants. This is in line with performance by Local Planning Authorities in London.



As for major dwelling applications, in the year 2020/21, 93% of applications that involved agreed extensions of time with the applicant, were determined within the agreed times performing slightly below the London average of 96%. Enfield's performance on the determination of major planning applications based on a rolling two-year average, has improved significantly since 2019.

5 Market challenges and land use constraints

This section provides commentary on wider market context to housing supply in Enfield. Build out rate in the borough continues to be challenging with large sites commencing 12-24 months after planning is approved and other sites stalling as a result of skills shortages, capacity on site and rising material costs.

Covid-19

During 2020, there was over 12 weeks of lockdown resulting in consultants being furloughed, the housing market stalling and a reduced supply chain. In Enfield, the labour market had already been significantly impacted by Brexit which reduced available workforce. The market indicators show that pricing for tenders will be challenging and result in a) higher tender returns or b) no bids where sub-contractor procurement is variable.

Following the initial lockdown in March 2020 most contractor's returned to site with a 30% reduction in capacity and sought financial support to offset additional costs associated with site social distancing requirements. Contractors working on one-off projects are now incurring additional costs to comply with social distancing requirements, similarly, sub-contractors are incurring additional costs which are not being reimbursed. While Contractors are not typically liable for Liquidated damages this is simply reducing their profits or mitigating their losses and impacting on delivery. A similar situation has developed regarding programmes of work, typically timescales and targets may be somewhat relaxed, but costs have increased for contractors and the increases are not being met by clients which will result in protracted build out rates.

As the reporting period coincided with the national lockdown, announced on 23 March 2020, Government considered this an unprecedented event which saw temporary disruption to local authority planning services and the construction sector. This has been reflected in this year's published Housing Delivery Test results through reducing the 'homes required' within the 2019 to 2020 year by a month and within the 2020 and 2021 year by four months in the Housing Delivery Test.

Land use constraints

The existing land use designations and the Council's existing development plans (Core Strategy, Development Management Document and Area Action Plans) sets out the land use policies to assess planning applications. Despite the aging local planning framework, Enfield's statutory plan comprises the recently adopted London Plan as well. Enfield has greater than 30% of the land area covered by Green Belt and over 300 ha of land designated as Strategic Industrial Location (SIL). The Borough also has significant amount of Site of Special Scientific Interest (SSSI) and has areas prone to high flood risk.

6 Actions to help increase housing delivery

As part of the Council's Housing Action Plan 2020 the Council identified a number of key actions and provided a progress update in the February 2021 Housing Delivery Action Plan.

Against the previous action plan the following have been delivered:

- Increase in number of applications in 2020-2021
- Appointment of two Housing Enabling Managers focussed on unlocking stalled sites
- Identification of 100 units across small sites for delivery in next two years
- Promotion of custom-build sites with 3 sites identified and in live planning, with works due to commence in 2023
- Acceleration of large regeneration schemes – Alma, New Avenue and Meridian Water

This 2022 Action Plan builds on the above performance and aims to tackle the drivers of change for the future. The Council has continued to promote our direct delivery schemes despite the economic difficulties of last year, with schemes progressing through design to planning and maintaining our contractors on site, to building out homes at pace. In the past year, we have submitted planning applications for over 333 homes, with completions expected by 2024.

As a result of the last action plan the Council has improved its own performance and has achieved the following which will deliver an average of 100 homes a year:

Site	Number of homes	Activity this year	Completion forecast
Newstead and Maldon	21 homes across two sites	Contract was let in March 2020 and build out accelerated to 2 years, despite Covid-19 impacting by 4 months at the outset.	Completed March 2022
Gatward Green	30 homes across three sites	Contract was let in March 2020 and build out accelerated to 2 years, despite Covid-19 impacting by 4 months at the outset.	Completed March 2022
Bury Street West	50 homes	Commencement of building works in 2021	January 2022
Meridian Water Phase 1a	900 homes	Golden brick achieved on site with developer progressing at pace to deliver first homes from 2023 onwards	2023 onwards
Alma Phases 2a and 4	303 homes	Planning consent approved in 2021 to vary and deliver	From 2024 - 2025

		additional homes across Phase 2A and 4; with phase 4 accelerated from 2025. Works commenced on Phase 2A in Sept 2021.	
Alma Phase 2a (iii)	66 homes	Works commenced in 2021.	April 2023
New Avenue regeneration	375 homes	Planning approved in 2021 to vary and deliver additional homes across Phase 2 and 3. Enabling Works commenced in Sept 2021 to maintain programme. 127 homes completed in Jan 2021.	April 2025
Exeter Road and Reardon Court	199 homes (across two sites)	Planning consented in 2021 and contractor selected to build out homes	2024 onwards

Given the difficulties in the market with build costs rising, we have diversified our development strategy to introduce MMC (modern methods of construction)⁷ in our programme and sharing our experiences with all housing providers in the market to accelerate delivery.

The 2022 Action Plan will build on last year's proposals and focus on:

Strategic priority	Delivery measure	Action	Responsible area	Timescale
Local Plan – plan making policy	A new Local Plan	✓ next stage of plan as set out in the LDS ⁸	Planning service	2022
Development Management process	Increased number of planning applications received and determined in year	<ul style="list-style-type: none"> ✓ Identification of sites currently in pre-app and agree PPA with where possible, determination within year of pre-app commencing. ✓ Assessment of planning conditions to derisk start on site and flexible approach to timing triggers and evidence required (rolled forward from 2021 Action Plan) ✓ Dedicated officer for discharge 	Planning service	2022

⁷ https://www.designingbuildings.co.uk/wiki/Modern_methods_of_construction

⁸ <https://new.enfield.gov.uk/services/planning/local-development-scheme/>

		<p>of conditions to minimise risk of overrunning 8 week determination period.</p> <ul style="list-style-type: none"> ✓ Agree standardised S106 draft, affordable housing clauses and SLA with legal team (rolled forward from 2021 Action Plan) 		
Increased supply build out of consented schemes	Improved build out of sites in construction, consented in last three years (not on site) and completions.	<ul style="list-style-type: none"> ✓ Assessment of status and interventions required for each site consented ✓ Review large multi-phased developments and identify build out programme, identifying ways to accelerate ✓ Improve data on sites consented, started and in construction (or stalled) 	Housing Enabling team in collaboration with Planning service	2022
Market-led interventions and land release for housing delivery	Developer and land owners forum established and functioning as advisory group	<ul style="list-style-type: none"> ✓ Set up a developer forum to promote borough and identify barriers to supply ✓ Identification of public sector sites suitable for residential development; including council owned corporate assets ✓ Review of small sites (under 100 units) and interventions required to assemble and unlock delivery ✓ Review schemes which were refused and actions needed to improve design and scheme proposal to bring back into planning ✓ Identification of additional windfall sites and promoted through planning service in year ✓ Agree strategy for releasing land from General Fund to HRA; including appropriation policy ✓ Council-led acquisitions programme to unlock delivery including small sites, S106 units and stalled or lapsed consents ✓ Quarterly meetings with large scale developments (proposed or consented): Edmonton Green Shopping Centre, Colosseum Retail Park, Palace Estates, Essential living ✓ Engage with other London Boroughs to identify types of schemes coming forward or built in last year to identify areas of improvement for Enfield. ✓ Dedicated resource for monitoring data related to the 	<p>Housing Enabling team (lead) in collaboration with property, asset management and planning service</p> <p>Planning service and Housing Enabling team</p>	2022

		Annual Monitoring Return		
Council-led housing delivery	Accelerated promotion through planning and build out of sites in council ownership	<ul style="list-style-type: none"> ✓ Establish in year timescales for determination – planning performance agreement with accelerated programme where possible ✓ Agree required validation and application information by site (including statutory consultees) at pre-app stage ✓ Reduce procurement timescales through use of contractor frameworks for delivery ✓ Accelerate build out of strategic and estate regeneration schemes. 	Development and Regeneration team in collaboration with the Planning service	2022

Detailed predictive forecasting and Annual Monitoring Report

During 2021 the council developed a monitoring tool for delivery on council owned sites and pipeline applications in the planning system to monitor performance against timescales. Moving forward this will help to identify trends in the number of lapsed planning applications and build out rates. The Council intends to carry out further analysis to build up a picture of completion rates by site and scale.

7 Next steps

The actions identified in this Housing Delivery Test Action Plan are for the period March 2022 to March 2023.

Progress will be monitored through existing monitoring processes in place, such as the annual land use surveys for housing and delivery. These existing surveys will be enhanced to provide the data necessary to inform any future action plans as they will use the same basic datasets. Much of this data already exists in the Authorities Monitoring Report (AMR)⁹ which is published each year by the Local Planning Authority and it is intended to review the Action Plan through the AMR process.

⁹ <https://new.enfield.gov.uk/services/planning/monitoring/>