

# OPPOSITION PRIORITY BUSINESS – 21<sup>ST</sup> NOVEMBER 2018

## THE LOCAL PLAN AND HOUSING DELIVERY

1. The purpose of this Opposition Priority Business is to highlight the alarming thrust of forthcoming proposals in the consultation on the Local Plan and their close connection with the lack of housing delivery in the London Borough of Enfield over the past ten years, much of which is the direct responsibility of the Council.

### Introduction

2. The Local plan consultation document runs to some 293 pages. The decision to proceed with the first stage public consultation (Regulation 18) was taken by the Local Plan Cabinet Sub-Committee on 24<sup>th</sup> October 2018 under the aegis of Cllr. Ahmet Oyken. The consultation is to last for 12 weeks including the Christmas period and is essentially the start of a protracted process including a 2<sup>nd</sup> consultation and concluding with an examination in public by a government appointed inspector some time in 2020.
3. The consultation is subject to a call-in on Monday, 19<sup>th</sup> November before Full Council at which some of our main concerns can be considered in more detail by the Overview and Scrutiny Committee.
4. Members will be aware that the London Mayor, Sadiq Khan, issued the latest draft London Plan in December 2017 and the Council is preparing evidence to respond to the London Plan Examination in Public. Enfield's local plan is required to be in conformity with the strategic objectives of the London Plan, particularly in relation prohibiting the loss Strategic Industrial Land and development in the Green Belt.
5. The Government's National Planning Policy Framework has also assessed the need for housing in the Borough and Enfield's Local Plan now needs to be prepared in accordance with the new national methodology.

### The Local Plan 2036

6. The title of this document does not do justice to the importance of its contents. Once agreed, the Local Plan will provide the guidelines for new residential and other forms of development in the Borough over the next 15 years.
7. This process started with an Early Issues and Options consultation undertaken in 2016. Last year the Council undertook an initiative to raise issues around growth and challenge attitudes and assumptions about new housing and infrastructure via the "Enfield Conversation". The outcome of the consultation was that the residents involved supported the delivery of higher numbers of homes in areas such as the Lee Valley Corridor. Town centres the A10 Corridor and council estates were the next popular area. Not surprisingly, the residents involved also felt that consequential investment in rail links, strategic roads and health and Education Services should accompany additional housing development.
8. The current draft proposals in the Local Plan are based primarily on the assumption that the population of Enfield will continue to grow rapidly from the current figure of around 340,000 to 380,000 by 2036. Therefore, it is claimed the Borough must in future allow substantial development in areas such as Crews Hill in the Green Belt and town centres and to a much greater height and density than was previously permissible. The Mayor of London has accordingly increased the target for

residential development from 798 dwellings per annum to 1,876 dwellings per annum in the latest draft London plan. We are led to believe that the Government wishes to increase the target further to 3,500 dwellings per annum in Enfield. It should be noted that Enfield has only delivered approximately 550 dwellings per annum a year since 2010. Were this explosive level of new housing to be delivered, it would place enormous stress on our roads in terms of increased traffic congestion, our schools who would to expand to meet the extra demand and our hospitals and the local health service generally.

9. No account is taken within the report to the Local Plan Cabinet Sub-Committee or the draft Local Plan on the outcome of the BREXIT negotiations and possible withdrawal of the UK from the Single Market and the consequential reduction in net migration that has been running at several hundred thousands a year over many years

### **Housing Delivery**

10. The delivery of new housing in the London Borough of Enfield over the past few years has failed to meet even the fairly modest targets set by the Mayor of London. This is surprising because Enfield is fortunate in having a relatively large amount of brown field land available for housing development, primarily at Meridian Water which could accommodate as many as 10,000 new homes.
11. The Council's housing delivery performance has been very mixed. Some regeneration schemes such as Dujardin Mews (19 new homes), Ladderswood Estate (356 net new homes), Alma Estate (247 net new homes) and the New Avenue Estate (245 net new homes) have proceeded albeit very slowly and will, hopefully, eventually produce new and desirable quarters of mixed tenure housing that people may want to live in.
12. However, Meridian Water and the small sites programme (94 new homes over 7 sites) have proved to be an unmitigated disaster.
13. The recent examination in public of the Council's Lee Valley Area Action Plan demonstrated a fundamental disagreement between the Council and the GLA over the designation of Strategic Industrial Land within the Borough. The Council wishes to de-designate SIL within the Meridian Water site (about a third of the total) and release it for housing. This is particularly important because the land in question, which is currently covered by industrial sheds, sits facing the River Lee reservoirs and is the most attractive and therefore most valuable land at Meridian Water. The GLA on the other hand wishes to preserve the overall amount of SIL to promote the London economy and maintain employment. It is prepared to release SIL at Meridian Water provided the Borough can identify other sites of similar capacity with the same level of transportation access but is not satisfied this can be achieved by the Council. This stalemate has been going on for over two years and appears to be no closer to a satisfactory resolution.
14. The small sites programme has been raised by us at Full Council on several occasions over the past 8 years. It would appear that the Parsonage Lane site is almost completed, but that the delays on several of the other sites continue.
15. One of the obvious lessons one can draw from the above is that the housing developments that have moved forward and produced or are in the process of producing new housing have been undertaken in partnership with the private sector, whether that be tested developers like Countryside or a housing association like One

Housing Group. In the case of Meridian Water and the small sites programme where the Council has attempted to take a lead role in the process, the result has been repeated failure to overcome the various problems and issues that inevitably arise on development projects. We hear now that the Council is intending to recruit large numbers of specialist development staff and commission major consultancy advice to help it manage the first phase of the Meridian Water project

16. One might think that the Council would draw the conclusion that in future it should approach all large-scale development activity with caution and prudence and a determination to minimise the risks, particularly financial risks involved. What we find however is that this Labour Council is now seriously considering taking more rather than less responsibility across a range of areas, for example by bringing the repairs and maintenance of the Council's housing stock in-house.

### **Conclusions**

17. The draft Local Plan, were it to be confirmed in its current form, would quite quickly transform Enfield into one of the largest conurbations in the UK. The Labour Administration may welcome such an outcome, but most residents in Enfield who have seen their quality of life deteriorate over the past few years would not. What is desperately needed is a step change in housing production at Meridian Water and faster progress on the various new large-scale regeneration schemes that the Council is planning. This would alleviate the pressure to develop every conceivable site in our urban areas and the Green Belt.
18. Also, the population projections on which the new Local Plan is based differ between the GLA and the Government. The consultation on the Local Plan 2036 will take at least a couple of years. Further work is needed by the Council to test the evidence behind these population growth assumptions. In addition, the Council needs to continually review actual population growth in Enfield over the next two years in the light of UK's departure from the European Union. Nobody of course knows what the outcome of the negotiations will be or their impact on net migration to the UK. All the more reason therefore to adopt a flexible approach to the Local plan process.

### **Recommendations**

19. The Council is asked to agree the following recommendations:
  - Undertake an independent review of the council's poor performance on housing delivery in order to learn from the mistakes of the past as well as the successes and chart a more effective way forward.
  - Undertake a comprehensive strategic review, after the EU negotiations are completed next year, of Enfield's likely population growth to establish clearly the base assumptions behind the projections and to make them public.
  - Revise the draft Local plan immediately to prohibit any residential development in the Green Belt in conformity with the Mayor's draft London Plan
  - Going forward, agree to keep the Local Plan under review in the light of changing population projections and improvements in housing delivery with a view to restricting residential development solely to brownfield sites.