

## MUNICIPAL YEAR 2019/2020 REPORT NO.

### ACTION TO BE TAKEN UNDER DELEGATED AUTHORITY

**PORTFOLIO DECISION OF:**  
Councillor Caliskan, Leader of the Council

<b>Agenda – Part: 1</b>	<b>KD Num: KD4996</b>
<b>Subject:</b> Enfield Housing Delivery Action Plan (2019)	
<b>Wards:</b> ALL	

### Contact officer and telephone number:

Neeru Kareer  
Telephone: 0208 3791634  
E-mail: [neeru.kareer@enfield.gov.uk](mailto:neeru.kareer@enfield.gov.uk)

## 1. EXECUTIVE SUMMARY

- 1.1 The Government introduced a new Housing Delivery Test (HDT) in October 2018 and published the first results of this covering the period 2015-2018 in February 2019.
- 1.2 Based on past three-year performance Enfield achieved an annual delivery rate of 85% against a three year target 2355. This triggers the requirement to produce a Housing Action Plan that sets out key actions the Council will be taking to stimulate housing delivery.

## 2. RECOMMENDATION

- 2.1 That the Portfolio holder approve Enfield's first Housing Delivery Action Plan (attached at **Appendix 1**)
- 2.2 Delegate to Executive Director of Place any minor alterations to the Plan prior to publication.

### 3. BACKGROUND

- 3.1 The Housing Delivery Test (HDT) was introduced in October 2018 by Government alongside the publication of the revised National Planning Policy Framework (NPPF). The HDT is part of Government's agenda to speed up plan making and housing delivery.
- 3.2 The HDT introduces a mechanism for assessing the number of homes built against housing need, (adopted targets) and comparing them over the past three financial year period (2015-2018).
- 3.3 The results of this test fall into different categories, where some form of action may be required with 95% constituting the 'pass' rate. The Test sets out the following:
1. If delivery falls below **95%** there is a requirement to produce a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years.
  2. If delivery falls below **85%** there is requirement to add a 20% buffer to the Council's five-year land supply of deliverable housing sites (to improve the prospect of achieving the planned supply); and
  3. As from 2019, if the test result is less than **45%** in 2019, increasing to **75%** from 2020 onwards then the Government has stated a 'presumption in favour of sustainable development must be applied making it difficult for planning authorities to resist planning applications. Essentially this means proposed developments should be granted planning permission unless it can be clearly demonstrated:
    - (i) policies within the NPPF that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development or
    - (ii) the adverse impacts of the development "significantly and demonstrably" outweigh their benefits);
- 3.4 Enfield achieved a delivery rate of 85% and therefore test **1** applies. The Housing Delivery Test will be a key national monitoring tool to incentivise local councils to build the homes they need. Importantly, it indicates that the Government is not only interested in the future housing plans of local councils but also their past housing delivery performance – in understanding the latter, the Government is better placed to assess whether the former is sufficient.

## Enfield's Housing Action Plan

- 3.5 For Enfield, housing targets are set out in the London Plan (adopted 2016). Enfield's current housing target is 798 homes a year. This target is due to increase to 1,876 homes a year once the new Draft London Plan is adopted.
- 3.6 Whilst the Council does not need to add an additional 20% buffer at this time, as a matter of good practice, and a commitment towards housing delivery, the Council has been applying a 20% buffer approach to its 5-year housing supply set out in our Annual Monitoring Report.
- 3.7 The Council's Annual Monitoring Report and Housing Trajectory (March 2019) projects a housing five-year supply of 4,808 new homes, meeting the 798 target. The target will of course significantly change if the Mayor's draft new London Plan target of 1,876 new homes a year is adopted later this year.
- 3.8 To provide some context, Enfield was among 108 other councils who failed to achieve the 95% 'pass rate' and the table below provides an indication of how neighbouring boroughs performed against their targets.

**Table1: Comparison with adjoining boroughs**

Local authority	Target 2015-2018	Delivery Test	Action
London borough Barnet	6,547	82%	20% Buffer
Broxbourne District	1,151	67%	20% Buffer
London borough Enfield	2,355	85%	Action Plan
London borough Hackney	4,513	82%	20% Buffer
London borough Haringey	4,506	48%	20% Buffer
London borough Islington	3,706	71%	20% Buffer
London borough Redbridge	3,370	38%	20% Buffer
London borough Waltham Forest	2,391	122%	None

- 3.9 The Housing Action Plan is not a statutory planning document, but rather the purpose of having an Action Plan in place should be seen as a proactive measure for local authorities to consider what actions can be taken to stimulate delivery.

## Enfield's Housing Delivery Action Plan

- 3.10 Enfield has an ambitious growth agenda and is committed to accelerating the delivery of good quality homes for its residents. The council is responding to the growth challenge through this Action Plan and a number of emerging new strategic documents, including Enfield's new Local Plan 2036. The Plan is a

good opportunity to bring together all of the projects, programmes and initiatives underway in the Council into one document.

### **Housing Delivery Board**

3.11 One of the first actions now establishment is an officer level Housing Delivery Board (HDB). This brings together senior officer across all service areas related housing delivery. The Board has overseen the development of the Action Plan.

3.12 In summary the key actions fall under two main areas:

**1) Process and enabling:** Improving our planning application process and decision-making function, alongside an effective plan-making role to provide a proactive growth strategy and build development and investment confidence.

- Ensuring the speedy delivery of a new Local Plan and Housing & Growth Strategy – highlighting the importance of all aspects of the Local Plan spatial strategy being delivered, most notably regeneration projects in the short term;
- Building resource and specialist capacity with the Planning Service to effectively manage major and strategic planning schemes.

**2) Direct Delivery:**

- Effectively manage the council's portfolio of land and assets for housing development.
- Support ongoing delivery of council-led housing regeneration and estate renewal programme to deliver more homes to Enfield (all types and tenures).

3.13 Progress on delivering the key actions of the Housing Action Plan will be monitored annually and reported through the Annual Monitoring Report.

## **4. ALTERNATIVE OPTIONS CONSIDERED**

The alternative is not to adopt the Housing Action Plan. The risk with this option is that the Council will find it harder to demonstrate its proactive approach towards housing delivery and stepping up delivery to the new London Plan target of 1,876. This option is not recommended as proactive measures are required to ensure positive HDT results.

## **5. REASONS FOR RECOMMENDATIONS**

The results of the HDT require the Council to produce a HAP to identify the challenges and identify actions to help address under-delivery in the borough. The need to deliver more and better homes in the borough is a corporate priority and the Action Plan will allow the Council to monitor its performance across key service areas responsible for housing delivery.

## 6. COMMENTS FROM OTHER DEPARTMENTS

### 6.1 Financial Implications

- 6.1.1 Upon adoption of the Housing Action Plan officer's time will be required to implement the document, including delivery and monitoring of the actions as well as the publication of the document on the website. Associated staff time and costs will be managed within the current service and existing budgets.
- 6.1.2 Any costs resulting from the delivery of the Housing Action Plan will be funded from existing service and budgets. This includes any annual updates in line with national planning policy as outlined in NPPF and Planning Practice Guidance.
- 6.1.3 The assumption is that the HAP would enable the delivery of Government housing targets each year, which would generate additional income to the Council through Council Tax receipts. At present, there are no financial penalties for non-delivery of Government housing targets but there would have consequential costs if planning sanctions are imposed on the Council.

### 6.2 Legal Implications (DRAFT)

- 6.2.1 Paragraph 75 of the NPPF (2019) provides that *"where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years"*. The Council has not met its target for 2015-18 and as such has triggered the need to prepare an action plan.
- 6.2.2 The Planning Practice Guidance (PPG) states that *"any area may wish to produce an action plan as a matter of good practice or to identify processes to exceed housing requirements and support delivery"*.
- 6.2.3 The Housing Action Plan is not a statutory document and therefore does not require independent examination or approval by Cabinet and/or Full Council.
- 6.2.4 There is no legal obligation to publicly consult on the Housing Action Plan. The PPG states that this is a decision for each local planning authority being *"mindful of the need to both produce and implement the document's proposals in a timely fashion"*. The PPG also encourages the involvement of relevant stakeholders in the process stating that *"it is for the local planning authority to decide which stakeholders to involve, although representatives of those with an impact on the rate of delivery should be included, such as: small and large developers; land promoters; private and public land owners; infrastructure providers (such as utility providers, highways, etc); ... neighbouring authorities with adjoining or cross-boundary sites"*.
- 6.2.5 The Housing Action Plan may be considered a material consideration in the determination of planning applications.

### **6.3 Property Implications (DRAFT)**

There are key actions identified that relate to the Council's property and asset management portfolio. However, there is no direct implications arising from the approval of the HAP.

### **7. KEY RISKS (DRAFT)**

There are risks associated with not publishing a HAP, the Council would not fulfil its duties to produce an Action Plan. Up to date policy documents provide improved guidance, clarity and certainty for all interested parties. It will assist with progression of Enfield's new Local Plan.

### **8. IMPACT ON COUNCIL PRIORITIES – CREATING A LIFETIME OF OPPORTUNITIES IN ENFIELD**

8.1 The Action Plan helps to implement the Council's priorities in the Corporate Plan through the primary objective of speeding up housing delivery in the borough. This will be a significant benefit to the community since there is a need to see a step change in building more homes in the borough to meet the needs of residents.

8.2 The HAP will form part of the emerging Local Plan conversation. The Local Plan is a project priority for the Corporate Plan. The implication of a decision to support the recommendation in this report will demonstrate assistance in the delivery of the Local Plan.

### **9. EQUALITIES IMPACT IMPLICATIONS**

The HAP has the primary purpose of speeding up housing delivery in the borough to meet the future requirements of Enfield's residents. This is essential to ensure health and wellbeing of Enfield's residents and visitors since significant new home building has been identified as a specific requirement.

### **10. PERFORMANCE AND DATA IMPLICATIONS**

The HAP will be monitored annually, and progress reported through the Council's Annual Monitoring Report.

### **11. PUBLIC HEALTH IMPLICATIONS**

Housing is fundamental to health as shown by the life-expectancy gap in the homeless population of approximately 30 years. With an increasing population it will be fundamental to the health to ensure adequate housing for residents.

### **Background Papers**

Appendix 1: Enfield Housing Action Plan 2019