BRIEFING NOTE

FOR THE ATTENTION OF:
Regeneration and Economic Development Scrutiny Panel

For discussion

Subject / Title:
Housing Delivery Test
Ward(s): All
10th February 2021

Officer Contact Details:
Helen Murch, Head of Strategic Planning and Design
Joanne Drew, Director Regeneration and Housing

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1. This briefing note sets out the implications of Enfield (the place, not the council) delivering 1,314 homes in the past 3 years (2018-2020) against the 2,328 net additional homes target arising from the existing Local Plan. It sets out the implications of this 56% delivery against the target.

2. It proposes, as included in an updated Housing Action Plan to be published shortly, additional actions to support delivery of housing in Enfield.

Housing Delivery Test

3. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
    - Every authority that fails to meet 95% of their housing targets needs to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years.
    - Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period.
    - Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development”

4. 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 delivering1,839 homes https://new.enfield.gov.uk/services/planning/housing-action-plan-2019-planning.pdf

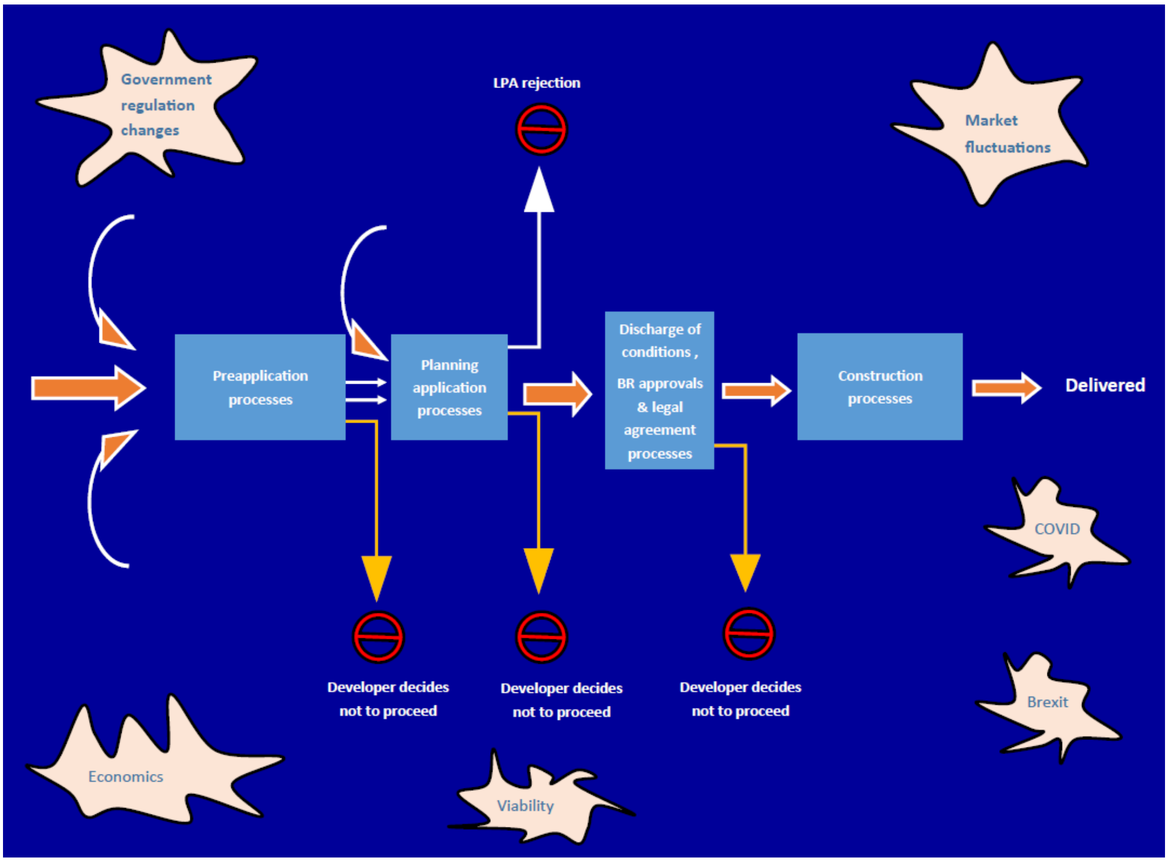
5. As a result we had to prepare a Housing Action Plan, published late 2019 (KD 4996). This set out 12 key actions with an aim to increase housing delivery in future years. These actions included but were not limited to publishing a number of Council Strategies; improving our planning application processes through the establishment of new Strategic Major Applications Team; and establishing a Housing Delivery Board for closer monitoring of housing delivery across the Council.

6. In 2020 Enfield fell below the 75% threshold, and we now fall into the “presumption in favour of sustainable development” category. What this means in practice, is that applications for new homes should be considered with more weight by planning committee and the planning service. It also means that applicants are more likely to be successful at appeal and are likely to submit speculative applications which are not policy compliant and are less likely to meet our design quality aspirations. In short, it erodes, the ability of the planning service and local councillors to control development for housing and is likely to lead to a mix and quality of housing beneath our needs.

7. For comparison, across London, delivery has been below the set targets as follows: 8 boroughs (Barking and Dagenham, Enfield, Haringey, Havering, Kensington and Chelsea, Redbridge, Southwark and Tower Hamlets) have failed to deliver 75% of target. 2 boroughs (Bexley and Camden) delivered between 75% and 85%. 7 boroughs (Barnet, Greenwich, Hackney, Islington, Kingston, Lewisham, Westminster) delivered more than 85% but less than 95%.

Housing Delivery

8. The Housing Delivery Test is based on new homes completed in a 3-year window. Delivery of homes is based not just on how the planning service determines planning applications, but also on the broader context that affects the development industry and developer and landowners decision making on whether or not to bring forward or progress with their housing proposals. . This broad context affects the number of applications the council receives, and how many developments go from permission to completion. Fig 1 below illustrates this concept of the planning pipeline (that the Local Planning Authority manages) sitting in this broader context and the points that potential housing developments can enter and fall out of the pipeline.



Process to housing delivery

Enfield's Track Record

9. The below table shows how many units have been entering the pipeline in recent years, are entering the planning pipeline, how many successfully gain planning permission and how this compares and performance against the plan target.

	Target	Units Submitted	Units gained planning	Net Additional Dwellings Delivered (incl. PD)	Net Additional Dwellings as percentage of target
14/15	560		715	399	71.3%
15/16	798		1059	672	84.2%
16/17	798		732	954	119.5%
17/18	**798**		1684	**389**	**48.7%**
18/19	**798**		753	**496**	**62.7%**
19/20	**732^**		647	**429**	**67%**
20/21	1246*	*c. 1200*			

Blue = basis of 2020 Housing Delivery Test, with average of 56% delivery
^ = 2019/20 housing targets have been reduced by one month to reflect disruption to planning services in the first lockdown
* = Expected new target based on adopted London Plan which supersedes 798

10. There are a few points to draw from this:
    a. Enfield does not receive enough applications to support achieving our new home delivery target. This reflects our local plan, which was designed for 560 homes as well as a perception issue and other factors.
    b. We grant, roughly, 75% of the major applications for housing that we receive but only 41% of minor housing applications. We have, over the course of HDT period, consented 3084 homes – this is above our target of 2328 but is clearly not enough to compensate for schemes which obtain planning but subsequently stall or do not proceed for development.
    c. Our housing delivery target will be increasing over the next 3 years. If we do not work to increase housing delivery, our delivery shortfall will increase exponentially as is suggested by 2020/21 line. This is likely to bring the council to the attention of the Government.

11. In addition,
    a. Of the 1,314 homes delivered in the past 3 years, 342 (26%) were delivered through council-led housing development. The public sector is a key part of new home building in Enfield.
    b. Permitted Development accounts for c 9% of our housing delivery on average over recent years. This is not insignificant; With recent changes to PD rights this number may increase in subsequent years. Although could be seen as a benefit in terms of meeting housing targets, the borough has lost the benefits associated with new planning applications, e.g. S106, affordable housing, high quality housing.

12. Tables 2 and 3, at the end of this note, compares Enfield's delivery performance with other boroughs across London. There is a very wide range of performance, however :

    - Roughly half of London boroughs do not achieve their target in any one year
    - Only 35% of planning "grants" in London result in completions – comparing year by year. There is a lag from planning through to construction, but still – this implies that we (and other London boroughs) need to grant permission for 165% of the homes we target.
    - Enfield has a low number of homes gaining permission, relative to similar outer London boroughs. Given that we consent slightly below the London average this indicates we are receiving a low number of applications compared to other London boroughs.

The updated Housing Action Plan – taking new actions to improve housing delivery

13. Enfield's performance on housing completions is a result of many factors and needs to be addressed through a variety of actions. We have made good progress on our existing Housing Action Plan but the Council will publish a new

plan that recognises the actions we need to take recognising the changing operating environment we are now working within.

14. Areas we have identified in our new Housing Action Plan that we need to improve on to increase housing completions are as follows:

15. Increase the number of applications submitted
    a. Enfield has a pipeline of sites but our adopted (current) local plan has a lower target than we are judged against and therefore does not identify enough sites to meet demand. Overall our pipeline of applications is not sufficient to meet our targets and we need to plan for more homes.
    b. We have seen declining applications in the past few years and we do not receive sufficient applications to meet our target.
    c. Perceived difficulty of getting consent in Enfield – this is unfounded as we are not out of step for London but there is a perception that we need to change through proactive communication with the industry
    d. We propose to, in addition to current activities, work “upstream” to encourage more applications
        - Create additional officer posts entirely focussed on encouraging new applications for housing and unlocking stalled sites. They will contact landowners and encourage them to apply and reviewed stalled sites to encourage new applications if appropriate.
        - Continue our programme of engagement with the private sector, to get out the message that Enfield supports new homes.
        - Introduce Article 4s to stop permitted development in specific areas, directing applicants to planning applications and redevelopment for additional homes. This is contrary to government policy which supports permitted development
        - Consider Local Development Orders to speed up housing delivery in specific areas; this will require additional resource.
    e. We need to stick to our plans to have a draft local plan ready for consultation for council to approve in June 2021.

16. Once applications submitted, supporting applications to a successful grant including committee determination.
    a. We have improved our pre-applications processes but need to do more. We have improved the timeliness of our determination and we need to maintain this.
    b. We will additionally
        - Further improve our pre-application processes, including for prior-approvals and discharge of conditions to ensure that Applications proceed more successfully, smoothly and quickly through the planning pipeline;
        - The quality of development that is delivered is of excellent quality and makes a strong positive contribution to the existing and new places of Enfield.
        - Increase planning committee training on design and other aspects, to support determination.

17. Translation of grant of planning consent into start of construction.

   a. We can do more to encourage this. We will additionally bring in new services to support discharge of conditions in a timely manner that achieves high quality developments.

18. The role of council housebuilding and regeneration in delivering new homes. Lack of development in the borough means the Council has to take a proactive role in council housebuilding and assess the barriers to delivery. We already have an ambitious programme and are lobbying government for further support to expand this programme.

19. Managing the housing market. In addition to our current actions, we will now:
    - Establish the number of empty homes and agree actions to bring them back into use
    - Identify opportunities and develop approaches for bringing forward self-build/ serviced plots, with a focus on providing this as an affordable housing route for those able to provide sweat equity.
    - Develop partnership approaches with custom build developers to improve housing offer

20. The above actions could incur additional costs of up to £500k/year, but they should be partially covered by increased application fees. These costs are not in the 21/22 budget.

Summary

21. Like many councils across the Country the effect of a sustained period of local authority cuts has led to the under resourcing of planning services. Only £1.66 of council tax for every resident is spent on spatial planning and planning determination, this is down from £4.90 in 2010. Along with an approach where housing supply has been largely left to the market the delivery of new housing has not matched pace with local plan targets and is far away from housing need.

22. Enfield has a~~a~~ Corporate Plan and Housing and Growth Strategy which puts good growth at its heart, and 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. We are now proposing further investment to encourage more applications for new housing.

23. Much of the supply delivered to date has been driven by the Council – for example through its partnership regeneration schemes. This demonstrates that when enabled to do so with the right funding and powers Councils can take the driving seat in delivering growth.

24. There are significant opportunities for growth in the Borough and the review of the Local Plan to be published in summer 2021 further establishes the vision and planning tools for growth in the Borough. Quality developments being brought forward by developers that match the Council's vision for Enfield as a place are what is needed. The Local Plan enables the Council to work at an

early stage with developers to bring forward schemes with evidential benefits to the community and which, long term create a vibrant and well connected place.

25. Our draft Housing Action Plan to drive the improvement of housing supply builds from what has been achieved so far and aims to tackle the drivers of change for the future. It includes the following themes:
    - Ensuring an effective development management process
    - Continuing to embed housing growth and delivery as a key priority of the council
    - An intelligence led approach to driving the right solutions
    - Efficient local plan and driving housing supply through infrastructure
    - Continuing to strengthen council led market interventions
    - Pro-actively pursuing housing development through a range of providers
    - Lobbying government to create the right conditions for development

Table 1: Planning Permissions and New Dwellings for All London boroughs (above target highlighted in green)

		2014/15				2015/16				2016/17				2017/18				2018/19				2019/20			
Borough code	Borough	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target	London Plan target	Planning Permission granted (units)	Net additional dwellings completed	Net additional dwellings as % of annual target
E09000002	**Barking and Dagenham**	1065	704	514	48.3	1236	2089	732	59.2	1236	1715	596	48.2	1236	11834	413	33.4	1236	4745	906	73.3	1944	3139	Data not yet released	
E09000003	**Barnet**	2255	2623	1324	58.7	2349	6223	1458	62.1	2349	3669	1799	76.6	2349	4890	2208	94.0	2349	3547	2209	94.0	2364	6184	Data not yet released	
E09000004	**Bexley**	335	445	810	241.8	446	688	-132	-29.6	446	2442	764	171.3	446	671	277	62.1	446	1073	486	109.0	685	830	Data not yet released	
E09000005	**Brent**	1065	1561	1559	146.4	1525	1433	1051	68.9	1525	8301	1364	89.4	1525	4986	694	45.5	1525	7316	1741	114.2	2325	2502	Data not yet released	
E09000006	**Bromley**	500	1341	411	82.2	641	803	700	109.2	641	1156	858	133.9	641	738	554	86.4	641	713	708	110.5	774	947	Data not yet released	
E09000007	**Camden**	665	3602	439	66.0	889	954	965	108.5	889	1098	1208	135.9	889	629	945	106.3	889	1110	827	93.0	1038	180	Data not yet released	
E09000001	**City of London**	110	190	226	205.5	141	346	77	54.6	141	404	7	5.0	141	118	138	97.9	141	41	55	39.0	146	7	Data not yet released	
E09000008	**Croydon**	1330	4304	1523	114.5	1435	3243	2044	142.4	1435	2736	2835	197.6	1435	4788	2076	144.7	1435	3711	1590	110.8	2079	1502	Data not yet released	
E09000009	**Ealing**	890	2209	897	100.8	1297	2354	721	55.6	1297	4525	845	65.2	1297	5242	1457	112.3	1297	3204	1754	135.2	2157	1230	Data not yet released	
E09000010	**Enfield**	**560**	**727**	**399**	**71.3**	**798**	**1068**	**672**	**84.2**	**798**	**752**	**898**	**112.5**	**798**	**1714**	**386**	**48.4**	**798**	**761**	**500**	**62.7**	**1246**	**130**	Data not yet released	
E09000011	**Greenwich**	2595	5212	1148	44.2	2685	15485	1720	64.1	2685	2194	2380	88.6	2685	2440	1901	70.8	2685	3012	1514	56.4	2824	335	Data not yet released	
E09000012	**Hackney**	1160	3757	1258	108.4	1599	1578	826	51.7	1599	1736	1196	74.8	1599	1427	1267	79.2	1599	1071	1522	95.2	1328	571	Data not yet released	
E09000013	**Hammersmith and Fulham**	615	4992	1360	221.1	1031	3415	368	35.7	1031	620	974	94.5	1031	570	1531	148.5	1031	3619	1046	101.5	1609	545	Data not yet released	
E09000014	**Haringey**	820	1299	133	16.2	1502	943	239	15.9	1502	1755	741	49.3	1502	2008	1200	79.9	1502	5156	568	37.8	1592	687	Data not yet released	
E09000015	**Harrow**	350	1149	410	117.1	593	2470	910	153.5	593	1523	656	110.6	593	2428	700	118.0	593	2021	1229	207.3	802	749	Data not yet released	
E09000016	**Havering**	970	987	642	66.2	1170	657	1012	86.5	1170	907	443	37.9	1170	1409	277	23.7	1170	2557	466	39.8	1285	981	Data not yet released	
E09000017	**Hillingdon**	425	2011	545	128.2	559	1488	709	126.8	559	1232	764	136.7	559	2817	842	150.6	559	3111	957	171.2	1083	3491	Data not yet released	
E09000018	**Hounslow**	470	2036	397	84.5	822	3921	480	58.4	822	3037	557	67.8	822	3106	911	110.8	822	2492	1103	134.2	1782	4249	Data not yet released	
E09000019	**Islington**	1170	2398	498	42.6	1264	933	1027	81.3	1264	1604	674	53.3	1264	521	367	29.0	1264	663	916	72.5	775	129	Data not yet released	
E09000020	**Kensington and Chelsea**	585	1222	984	168.2	733	261	384	52.4	733	486	355	48.4	733	177	335	45.7	733	296	115	15.7	448	25	Data not yet released	
E09000021	**Kingston upon Thames**	375	1070	526	140.3	643	647	239	37.2	643	1562	273	42.5	643	626	217	33.7	643	1531	501	77.9	964	443	Data not yet released	
E09000022	**Lambeth**	1195	5659	1411	118.1	1559	4869	1347	86.4	1559	4420	1135	72.8	1559	1830	1543	99.0	1559	4041	1219	78.2	1335	4310	Data not yet released	
E09000023	**Lewisham**	1105	5388	1468	132.9	1385	2396	1539	111.1	1385	1494	1604	115.8	1385	437	526	38.0	1385	2753	1628	117.5	1667	1487	Data not yet released	
LLDC	**London Legacy DC**					1471	701	0	0.0	1471	1728	0	0.0	1471	3080	0	0.0	1471	1882	0	0.0	2154	721	Data not yet released	
E09000024	**Merton**	320	818	425	132.8	411	587	508	123.6	411	995	434	105.6	411	1468	648	157.7	411	601	273	66.4	918	27	Data not yet released	
E09000025	**Newham**	2500	2653	2050	82.0	1994	3150	1441	72.3	1994	6473	2377	119.2	1994	2845	1846	92.6	1994	7275	2505	125.6	3280	4586	Data not yet released	
OPDC	**Old Oak and Park Royal DC (OPDC)**						7	0	0.0	0	21	0	0.0	0	1800	0	0.0	0	236	0	0.0	1367	0	Data not yet released	
E09000026	**Redbridge**	760	966	257	33.8	1123	924	54	4.8	1123	1256	755	67.2	1123	1025	462	41.1	1123	1075	764	68.0	1409	666	Data not yet released	
E09000027	**Richmond upon Thames**	245	1067	241	98.4	315	648	513	162.9	315	810	465	147.6	315	600	382	121.3	315	225	423	134.3	411	220	Data not yet released	
E09000028	**Southwark**	2005	3246	1141	56.9	2736	2222	1382	50.5	2736	1605	2412	88.2	2736	1819	818	29.9	2736	2577	3208	117.3	2355	1661	Data not yet released	
E09000029	**Sutton**	210	1362	427	203.3	363	973	391	107.7	363	2118	653	179.9	363	342	697	192.0	363	506	575	158.4	469	202	Data not yet released	
E09000030	**Tower Hamlets**	2885	12932	916	31.8	3931	6293	2394	60.9	3931	8518	4827	122.8	3931	3312	2003	51.0	3931	5069	1524	38.8	3473	8074	Data not yet released	
E09000031	**Waltham Forest**	760	951	671	88.3	862	689	973	112.9	862	2303	1033	119.8	862	2877	712	82.6	862	1982	613	71.1	1264	542	Data not yet released	
E09000032	**Wandsworth**	1145	17331	1084	94.7	1812	5641	2738	151.1	1812	10287	2336	128.9	1812	9802	2247	124.0	1812	7280	1913	105.6	1950	3439	Data not yet released	
E09000033	**Westminster**	770	2606	749	97.3	1068	2948	908	85.0	1068	3936	1342	125.7	1068	2263	1143	107.0	1068	1549	803	75.2	985	433	Data not yet released	
N/A	**Brent (incl Old Oak & Park Royal DC)**	1065	1561	1559	146.4	1525	1440	1051	68.9	1525	8322	1364	89.4	1525	6786	694	45.5	1525	7552	1741	114.2	3692	2502	Data not yet released	
N/A	**Newham (incl. London Legacy DC)**	2500	2653	2050	82.0	3465	3851	1441	41.6	3465	8201	2377	68.6	3465	5925	1846	53.3	3465	9157	2505	72.3	5434	5307	Data not yet released	
	London boroughs - Total	**32210**	**98818**	**26843**	**83.3**	**42388**	**83047**	**30390**	**71.7**	**42388**	**89418**	**39560**	**93.3**	**42388**	**86639**	**31723**	**74.8**	**42388**	**88801**	**36161**	**85.3**	**52287**	**55224**	**Data not yet released**	

Table 2: London boroughs – Number of units permitted 2014/15 to 2018/19 vs Number of additional dwellings completed (same period), plus three-year averages

				3-year averages					
Borough	Total Permissions: 2014/15 to 2018/19	Net additional dwellings: 2014/15 to 2018/19	Net Additional Dwellings as percentage of units granted permission	2014/15 to 2016/17			2015/16 to 2017/18		
				Net Units permitted	Net Units completed	% completed	Net Units permitted	Net Units completed	% compl
Barking and Dagenham	21,087	3,161	15.0	4508	1842	40.9	15638	1741	
Barnet	20,952	8,998	42.9	12515	4581	36.6	14782	5465	
Bexley	5,319	2,205	41.5	3575	1442	40.3	3801	909	
Brent	23,597	6,409	27.2	11295	3974	35.2	14720	3109	
Bromley	4,751	3,231	68.0	3300	1969	59.7	2697	2112	
Camden	7,393	4,384	59.3	5654	2612	46.2	2681	3118	
City of London	1,099	503	45.8	940	310	33.0	868	222	
Croydon	18,782	10,068	53.6	10283	6402	62.3	10767	6955	
Ealing	17,534	5,674	32.4	9088	2463	27.1	12121	3023	
Enfield	**5,022**	**2,855**	**56.8**	**2547**	**1969**	**77.3**	**3534**	**1956**	
Greenwich	28,343	8,663	30.6	22891	5248	22.9	20119	6001	
Hackney	9,569	6,069	63.4	7071	3280	46.4	4741	3289	
Hammersmith and Fulham	13,216	5,279	39.9	9027	2702	29.9	4605	2873	
Haringey	11,161	2,881	25.8	3997	1113	27.8	4706	2180	
Harrow	9,591	3,905	40.7	5142	1976	38.4	6421	2266	
Havering	6,517	2,840	43.6	2551	2097	82.2	2973	1732	
Hillingdon	10,659	3,817	35.8	4731	2018	42.7	5537	2315	
Hounslow	14,592	3,448	23.6	8994	1434	15.9	10064	1948	
Islington	6,119	3,482	56.9	4935	2199	44.6	3058	2068	
Kensington and Chelsea	2,442	2,173	89.0	1969	1723	87.5	924	1074	
Kingston upon Thames	5,436	1,756	32.3	3279	1038	31.7	2835	729	
Lambeth	20,819	6,655	32.0	14948	3893	26.0	11119	4025	
Lewisham	12,468	6,765	54.3	9278	4611	49.7	4327	3669	
London Legacy DC	10,081	0	0.0	5119	0	0.0	5509	0	
Merton	4,469	2,288	51.2	2400	1367	57.0	3050	1590	
Newham	22,396	10,219	45.6	12276	5868	47.8	12468	5664	
Old Oak and Park Royal DC (OPDC)	2,102	0	0.0	66	0	0.0	1828	0	
Redbridge	5,246	2,292	43.7	3146	1066	33.9	3205	1271	
Richmond upon Thames	3,350	2,024	60.4	2525	1219	48.3	2058	1360	
Southwark	11,469	8,961	78.1	7073	4935	69.8	5646	4612	
Sutton	5,301	2,743	51.7	4453	1471	33.0	3433	1741	
Tower Hamlets	36,124	11,664	32.3	27743	8137	29.3	18123	9224	
Waltham Forest	8,802	4,002	45.5	3943	2677	67.9	5869	2718	
Wandsworth	50,341	10,318	20.5	33259	6158	18.5	25730	7321	
Westminster	13,302	4,945	37.2	9490	2999	31.6	9147	3393	
Brent (incl Old Oak & Park Royal DC)	25,699	6,409	24.9	11361	3974	35.0	16548	3109	
Newham (incl. London Legacy DC)	32,477	10,219	31.5	17395	5868	33.7	17977	5664	
London boroughs - Total	449,451	164,677	36.6	274011	96793	35.3	259104	101673	