

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

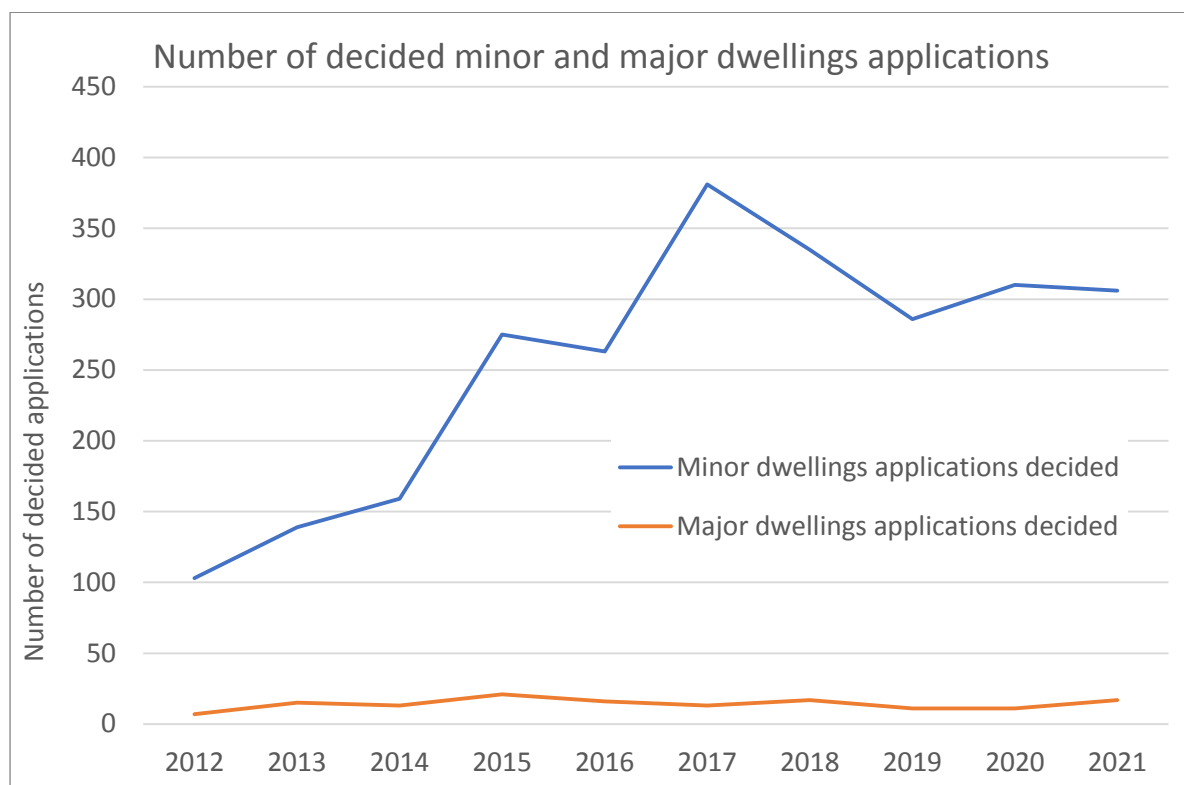
4 Planning decisions performance

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.

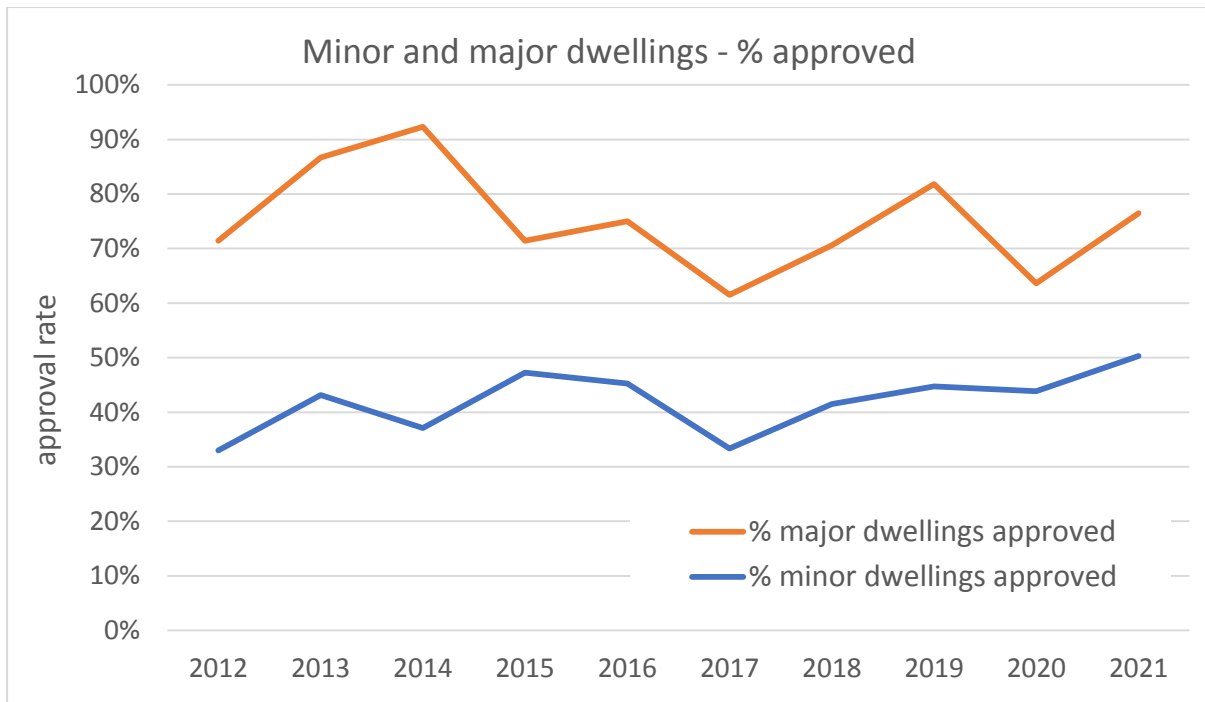
Table 1 below shows the number of minor and major dwellings applications decided in the previous ten-year period. Source District Planning Applications PS2 tables⁶.



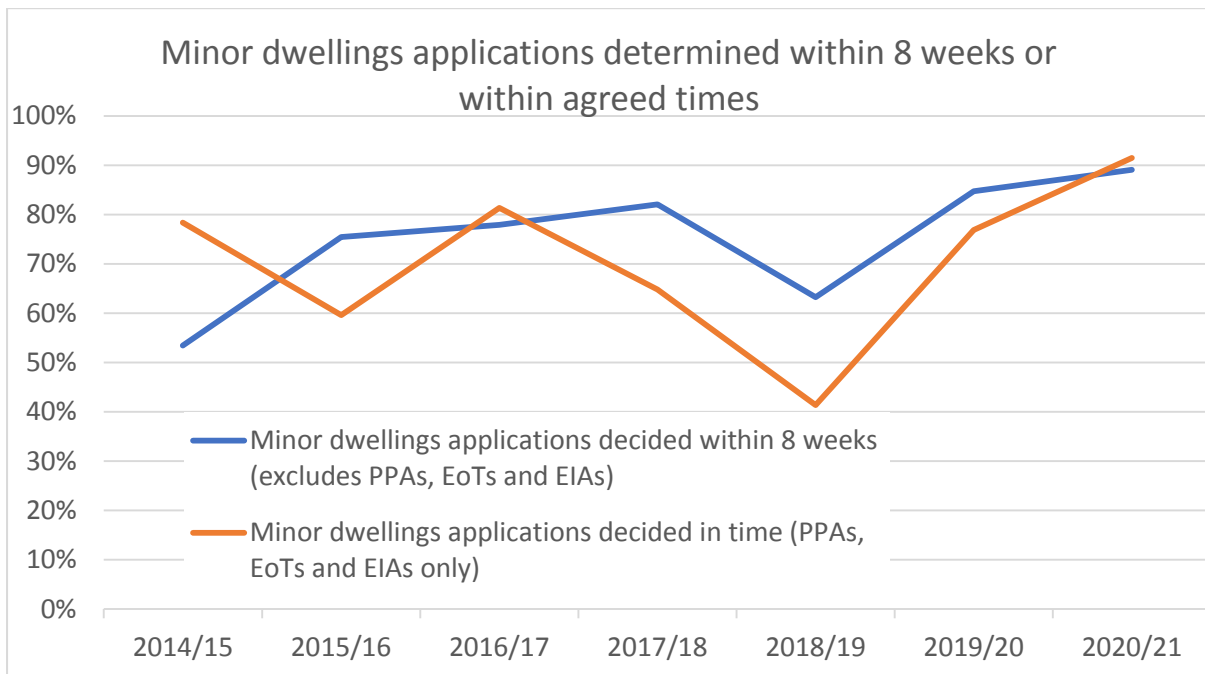
Approval rate

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/>