



Homes built on small sites: Serious discrepancies between the London Plan and Enfield Council's draft Local Plan

In its draft Local Plan, Enfield Council has stated that it plans to meet the Mayor's London Plan target for the number of homes built on small sites. However our analysis shows otherwise.

Housing built on small sites is important.

"Small sites" are those with the potential for residential development, which have an area of less than 0.25 hectares. Over the last 14 years, new housing built on small sites has accounted for more than a third of all additional homes built in Enfield (37%), an average of around 250 dwellings per annum. ^[1]

Small sites play a very important role in new housing across London and have a number of benefits. For example, small sites can be delivered relatively quickly by small and medium-sized developers, who are more likely to be based locally and employ local people. Small sites also help to deliver a diverse range of housing types, including family homes, in a range of sustainable locations which benefit from existing infrastructure and help support town centres and high streets.

Enfield Council claims to support the London Mayor's target for small site housing.

The Mayor's London Plan (2021) places a great deal of importance on small sites and says that boroughs should pro-actively support well-designed new homes on small sites and sets a minimum target for each borough.

The minimum small sites target for Enfield is 353 homes per annum. ^[2]

Enfield's draft Local Plan supports this target and says the council will "*seek to achieve the London Plan target of 353 new homes per year on sites of less than 0.25 hectares*". ^[3]

Building 353 homes per year would provide 7,060 homes over the 20-year timeframe covered by the draft Local Plan.

A detailed review of the council's draft Local Plan shows that the London Plan target for small site housing has not been properly accounted for.

It appears that the council's draft Local Plan does not, in reality, properly account for the London Plan target for small site housing.

We reviewed and assessed all of the small site housing in the council's draft Local Plan and the numbers just don't add up.



The draft Local Plan only accounts for (at most) 5,087 homes coming from small sites over the next 20-years, although we think the number is actually closer to 4,100 once various errors in the council's figures have been accounted for.

This means that the draft Local Plan is around 3,000 homes short of the minimum London Plan target for small sites.

The analysis to uncover these anomalies is quite complex, so we have provided a more detailed explanation in the appendix.

Enfield's draft Local Plan would be very different if the London Plan target had been properly accounted for.

The council has significantly undercounted the number of homes that will be built on small sites, and this has serious implications.

Enfield Council's draft Local Plan sets a proposed strategy for the borough for the next 20-years. An important part of the Plan is identifying where and how 25,000 homes will be built in Enfield over the 20-year period. The council says there are not enough brownfield sites to build 25,000 homes, and that 6,500 homes need to be built in Green Belt areas.

However, if the homes built on small sites had been properly accounted for, then at least one of the Green Belt areas earmarked for development in the draft Local Plan would almost certainly not need to be developed.

The undercounting of small sites is just one of a number of issues.

The undercounting of homes delivered on small sites is a serious issue, with far reaching consequences. However, it is just one of a number of issues that we have identified with the draft Local Plan's housing calculations. We hope to report on the other issues we have uncovered in the coming weeks. Suffice to say, the draft Local Plan should be markedly different once these numerical issues and inaccuracies have been properly addressed.

Better Homes Enfield

FOOTNOTES

1. Enfield Small Sites Research 2019
2. Policy H2 and Table 4.2 of the London Plan 2021
3. Policy 8.4 of Enfield's draft Local Plan 2021



APPENDIX 1 – ANALYSIS EXPLANATORY NOTES

The London Plan minimum target for housing built on small sites

The London Plan policy H2 stipulates that a minimum of 353 homes per annum should be on small sites in Enfield. The evidence shows that this minimum target is not unrealistic:

- Historically 37% of new housing built in Enfield has come from small sites. If this rate continued, then an average of 462 homes per year would be built on small sites.
- The findings of the council's "Enfield Small Sites Research 2019" showed that Enfield could deliver 300 homes per annum on small sites.

Draft Local Plan – Accounting for the London Plan small site housing target

Enfield Council's draft Local Plan says it will seek to achieve the London Plan target of 353 homes per annum. This means the draft Local Plan should account for and include 7,060 homes from small sites (28% of the 25,000 overall housing target).

There are two ways housing from small sites could have been included in the draft Local Plan.

1. They can be classified as "Allocations (as defined in Strategic Policy SP H1: Housing development sites)", "other deliverable sites" or "other developable sites".
Small sites for housing that the council has been made aware of, are assessed as part of the Housing and Economic Land Availability Assessment (HELAA) and are either excluded or classified as allocation sites, deliverable site, or developable sites in the draft Local Plan.
2. They can be classified as "unaccounted small windfall sites".
This is an allowance for small sites that the council has not yet been made aware of or assessed as part of the HELAA but that are likely or needed to come forward in the future.

Unfortunately, the HELAA contains a number of errors, which makes it difficult to calculate precisely how many small sites homes have been included. Notwithstanding this, we are able to present the following two options:

- A. Ignoring errors, the maximum number of small sites homes identified in the HELAA and classified as allocation, deliverable or developable sites is 3,547 over 20-years
- B. After accounting for errors we have found thus far, * the number of small site homes identified in the HELAA and classified as allocation, deliverable or developable sites is 2,556 over 20-years



Clearly, neither option meets the 20-year minimum target of 7,060 homes; Option A has a shortfall of 3,513 homes and Option B a shortfall of 4,504.

The shortfall could have been accounted for in the draft Local Plan as “unidentified small windfall schemes”. However, the Plan only allocates 1,540 homes as “unidentified small windfall schemes” over 20 years (see draft Local Plan Table 8.2).

This means that there is at least 1,973 - 2,964 small site homes missing from the draft Local Plan.

Table 1: Summary of housing from small sites in draft Local Plan.

	Option A (HELAA errors included)	Option B (HELAA errors removed*)
HELAA small site analysis	3,547	2,556
Unidentified small windfall schemes	1,540	1,540
TOTAL SMALL SITE HOMES ACCOUNTED FOR IN DRAFT LOCAL PLAN	5,087	4,096
SHORTFALL AGAINST LONDON PLAN MINIMUM TARGET OF 7,060 HOMES	1,973 homes short of <u>minimum</u> required	2,964 homes short of <u>minimum</u> required

* Errors include sites that are misclassified as small sites (e.g. are substantially larger than 0.25 ha, such as Cockfosters Tube Station), or where the housing estimates are inaccurate (e.g. do not reflect the typology assumption or approved plans for a site), or where the same site has been included more than once.