Enfield Small Sites Research

Detailed Report and Case Study Findings

London Borough of Enfield

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Quality information

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1. Introduction

1.1 The London Borough of Enfield is an ambitious, forward thinking Borough with a desire to drive positive change and to deliver much needed socio-economic inward investment. This commitment to change includes maximising the supply of housing for the needs of the Borough and London.

1.2 The Borough has been set the challenge by the Mayor in the London Plan 2017 to deliver 18,760 new homes over the London Plan Policy period 2019/20 to 2028/29. This equates to the delivery of 1,876 new homes per annum for every year of the plan period. This requirement is substantially higher than that contained in the 2016 London Plan target of 798 per year totalling 7,976 over at 10 year plan period.

1.3 In preparing its Regulation 18 Consultation Document for its Local Plan, London Borough of Enfield ("Enfield") became aware that the spatial approach proposed in the London Plan 2017 ("the Plan") would constrain its ability to deliver Good Growth.

1.4 Therefore Enfield is proposing amendments at the Examination of the Plan aimed at facilitating Good Growth delivery.

1.5 One of Enfield's particular concerns about the Plan is the deliverability of the very ambitious dwelling targets contained in the Small Sites Policy (H2) of 983 dwellings per annum. Its initial reaction was that this was not likely to be achievable in the borough. The Small Sites Policy (H2) is essentially about widening the scope for more windfall sites to come forward and yet NPPF requires that there be compelling evidence that such sites have consistently become available in a local area and will continue to provide a reliable source of supply to be counted towards a five year supply.

1.6 Enfield is not opposed to the principle of intensification proposed through H2. However it is not prepared to accept the target unless there is compelling evidence that it could be achieved. As far as Enfield is concerned (and as evidenced at the Housing Technical Seminar held on the 6th November 2018) the evidence within the Plan and the SHLAA is hardly compelling. With this in mind Enfield has decided to commission this report to see whether Enfield has realistic prospects of achieving the London Plan 2017 Small Sites Target. .

1.7 The research included within this report, includes:

- A study of existing data to look more closely at small site delivery trends in Enfield, including the impact of development management policies;
- A study of the composition and characteristics of exemplar areas of intensification to determine whether the anticipated yield was matched by the opportunities;
- A viability study looking at the market in Enfield and the rewards and constraints affecting small site delivery;
- Consideration of other obstacles to small site development, and
- The production of an exemplar small site design code to determine the extent of resource required to replicate these across the Borough.

1.8 Enfield's researched evidence is that the target for Small Sites in Enfield is undeliverable and for this reason it is seeking flexibility in the London Plan 2017.

2. Small Sites

What are small sites?

2.1 For the purposes of this report and the draft London Plan, "small sites" are those with potential for residential development which have an area of less than 0.25ha. There is no upper limit on the number of units they might accommodate.

2.2 There was previously some ambiguity in the wording of Policy H2 in the initial publication of the draft London Plan in December 2017, which appeared to suggest that small sites were those under 0.25ha developed for fewer than 25 net residential units. However, "Minor suggested changes" were published in July 2018, removing this ambiguity by clarifying that small sites can include those developed for more than 25 dwellings, though the majority are anticipated to be for fewer than 25.

2.3 Further discussion of the draft Policy H2 is set out in Section 3 of this Report.

Summary of the SHLAA approach to small sites

2.4 Small sites are examined in Chapter 6 of the 2017 SHLAA, which:

"…. summarises the methodology and approach used to estimate projected housing capacity on small sites ..." (paragraph 6.1);

2.5 Three approaches are taken to evaluate the "capacity" of small sites to contribute to future housing growth:

2.6 **Approach 1 – medium term trend in delivery 2008/09 – 2015/16 –** looking at the trend in net housing completions on small sites over the eight year post-recession period. Numbers were adjusted to remove :

- infill / new build development on undeveloped land within residential curtilages (consistent with the discouragement for "garden grabbing" in the NPPF 2012 at paragraph 48)
- net completions resulting from office-residential conversions allowed through permitted development rights (first introduced in 2013).

2.7 **Approach 2 – Longer term past delivery 2004/05 – 2015/16 –** This looks at the trend in net housing completions on small sites over a somewhat longer period including pre-recession years. As for Approach 1, net completions resulting from office-residential conversions allowed through permitted development rights were removed. But for this approach, no adjustment was made to remove infill/new build schemes on undeveloped land within a residential curtilage.

2.8 **Approach 3 – Incremental intensification -** This begins with modelling of possible delivery through intensification of small sites among the existing stock of houses (not flats) in selected residential areas which are seen as sustainable locations. The modelled component looks only at small sites of up to 10 net additional dwellings, and includes conversions / subdivisions, as well as new build on infill sites. It does not include changes of use of non-residential buildings, or extension of existing apartment buildings.

2.9 To the modelled component is added a "remaining windfall" figure which is derived from historic data of average past completion rates through other types of small site residential development. These include conversions and new build delivering more than 10 net additional new dwellings; extension of apartments; and redevelopment or change of use of non-residential buildings (though change of use of offices to residential under permitted development rights are still excluded).

Underlying Thinking

2.10 Paragraph 6.4 of SHLAA Chapter 6 states that consideration of the three Approaches:

"… aims to comprehensively assess both 'historic' and 'expected future trends', taking into account the potential impact of existing and proposed planning policy, market cycles and housing market trends." (paragraph 6.4)

2.11 **Despite this statement, the SHLAA's analysis of the effects of existing planning policies, market cycles and past trends on small site delivery is limited.** It mainly consists of paragraphs 6.8 and 6.9, together with

Figure 6.1. These indicate that for London as a whole, completions on small sites peaked prior to 2008, with conversions making up approximately 20% of the total[1]. It goes on to show how this pattern was affected by the recession. By 2015/16 total small site completions had recovered close to the previous high - but conversions had not bounced back in the same way, flat-lining at approximately 8%-9% of the total. Paragraph 6.9 ends with the statement:

"This may also be due to the impact of planning policy restrictions, for example conversion quotas or policies which generally resist infill development. These effectively apply a presumption against further small site development in certain areas through conversions or small-scale intensification."

2.12 However, the SHLAA offers no detailed assessment of these suggestions, which seem to be based on the following assumptions:

- that local policies towards conversions and small scale intensification have changed since the pre-recession peak, to become more restrictive than they once were;
- other types of small site development - presumably changes of use[1], new build schemes of more than 10 dwellings, upward extension of flats - have filled the gap.

2.13 In Enfield the pattern of small site completions over time shows some differences from the whole of London. Total small site completions peaked in 2007/08; and although they have recovered somewhat in recent years, this is to only two thirds of the pre-recession peak. As for the whole of London, conversion rates fell after the recession, and have not recovered to 2007 levels; but nonetheless, conversions still make up 23% of all small site completions in the borough.

2.14 It is important to note that local development plan policies in Enfield have used a threshold of 20% of conversions in any street since 2004. This would seem to contradict the SHLAA inference that local policy "quota" restrictions have suppressed the recovery of conversion and intensification developments post-recession – in fact this aspect of the policy regime has not substantially changed over this period.

1 Not including changes of use from offices to residential under permitted development rights

2.15 It is also not clear from the SHLAA what effect permitted development rights for change of use from offices to residential may have had on both overall small site supply, and on other types of small site development. In Enfield, office to residential permitted development rights delivered an additional 112 dwellings from small sites in 2015/16, more than any other form of small site development. This boosted small site supply up from 191 to 303 homes. It is possible that small to medium sized developers and builders have focussed on this source; but that as opportunities reduce, their attention may increasingly be returning to other forms of small site development such as conversions.

Modelling Assumptions

2.16 There are important concerns about the modelling approach used in the SHLAA, as set out below.

2.17 The findings of the SHLAA in relation to small sites rely heavily on the modelling of intensification of existing housing stock through conversions and new build infill of ten or fewer net additional homes. The modelling is based on a number of assumptions and factors which are evidenced and explained to varying degrees.

1% Growth Rate

2.18 A key assumption in the SHLAA small sites modelling is that 1% of the existing stock of houses will increase in density in the selected areas each year (paragraph 6.23), reduced to 0.25% for Conservation Areas (paragraph 6.28). SHLAA paragraph 6.24 states that:

"The 1% assumption is considered to provide a reasonable estimate for the level of net additional housing that could be provided in view of the potential impact of the proposed policy changes in the draft London Pan."

2.19 SHLAA Chapter 6 does not provide any further evidence, analysis or reasoned justification for this 1% "annual growth rate" assumption. There does not appear to have been any testing of this assumption, for instance through real-world case study examples. Rather, the 1% growth assumption seems to rely wholly on a judgement, the basis for which has, to date, been poorly defined and supported.

2.20 This is very concerning, as the outputs of the modelling – and hence the London Plan small sites targets - are extremely sensitive to changes in the growth assumption. Halve or double the growth

assumption, and the modelled intensification numbers halve or double in response. This raises a serious question mark over the robustness of the modelling and the projected "capacity" for small site development.

Selected Areas

2.21 The modelling identifies areas of existing housing as suitable for intensification if they would meet at least one of the following criteria:

- PTAL s 3-6 (2021 PTAL map)
- within 800m of a town centre boundary
- within 800m of a tube or rail station.

2.22 These criteria are examined in the context of the Case Studies presented in Section 6 of this Report, which queries whether these areas genuinely have capacity for this level of intensification given their particular travel, social and environmental infrastructure requirements.

Growth Factors

2.23 The modelling seeks to take account of the type of houses which might be subject to intensification (see SHLAA paragraph 6.26). By examining records of past intensification proposals[2] between 2008/09 and 2015/16, the numbers of dwellings generated has been compared with the existing number of dwellings. Data from SHLAA Tables 6.9 and 6.10 can be combined as in Table 1:

2.24 This shows that across London, conversions of existing houses yielded just under half of supply from these sites, at an average of 1.34 net additional dwellings for every existing dwelling within the site (gross growth factor of 2.34 – see SHLAA Table 6.10). This number has been applied in the modelling to the existing stock of unconverted terraced houses, on the basis that intensification of this house typology is likely to consist mainly of conversions. Whilst this may be generally the case, the number used seems to include conversions of semi-detached and detached houses as well – which might be expected to deliver more new homes per existing property than would terraced housing.

2 Sites for 10 or fewer dwellings

2.25 The data also shows that across London, all types of intensification development has historically yielded an average of 2.23 net additional dwellings for every existing dwelling on the site (a gross growth factor of 3.23 – see SHLAA Table 6.9). This number has been applied by the modelling to the existing stock of unconverted/undeveloped semi-detached and detached houses - despite the fact that it would seem to include intensification involving terraced housing as well, which might be expected to deliver fewer new homes per existing property. The reasoning behind this is unclear.

2.26 This analysis highlights that there are uncertainties surrounding the validity of using these growth factors as proxies for housing yields from terraced and semi/detached house typologies. These uncertainties and their implications for the modelling outputs are not explored or explained in the SHLAA.

Table 1. Small site trend 2008/09 – 2015/16

(Intensification of existing housing stock < 0.25ha delivering ten units or fewer)

Area	Form of development	Number of Dwellings				Gross growth factor	Net growth factor
		Proposed	Existing	Net additional			
Enfield	**Conversions***	681	298	383	47%	2.29	**1.29**
	Other**	491	57	434	53%	8.61	7.61
	Total***	1,172	355	817	100%	3.30	**2.30**
All London	**Conversions***	18,033	7,710	10,323	47%	2.34	**1.34**
	Other**	14,056	2,236	11,820	53%	5.29	5.29
	Total***	32,089	9,946	22,143	100%	3.23	**2.23**

*Source: * SHLAA Table 6.10 ** Figures derived from Total – Conversions *** SHLAA Table 6.9*

2.27 Further interrogation of the data in SHLAA Tables 6.9 and 6.10 provides a growth factor for "other" small site developments of ten or fewer dwellings which are not conversions. For the whole of London this average growth factor is 6.29 gross (5.29 net); but for Enfield is significantly higher at 8.61 gross (7.61 net). The reason for this differential is unexplained in the

SHLAA. However the typical urban typography of Enfield evidenced later in this report does not support the suggestion that Enfield's small sites have a large capacity than small sites elsewhere in London.

Remaining small site windfalls

2.28 To the modelled element, the SHLAA adds "remaining windfall capacity". This is an estimate of delivery from other small site housing developments not included in the modelling of intensification. It is based on the past record of delivery over the eight year period 2008/09 – 2015/16, and includes new build schemes for more than ten dwellings; upward extension of apartment buildings; and changes of use (other than for office to residential under permitted development rights).

SHLAA Conclusions for Small Sites

2.29 SHLAA chapters 6 and 9 contain relatively little in the way of further analysis and reflection on the implications of these results - particularly in relation to the scale of change and reliance on modelled intensification at borough level.

2.30 Major concerns remain over both the lack of justification for the 1% Growth Assumption; and the validity of the different growth factors used for semi/detached houses and terraced houses. The multiplier effect of these two modelling inputs on the small site "capacity" estimates is profound – increasing these concerns further.

2.31 When the modelling is combined with the remaining small site windfall estimate, the SHLAA produces "capacity" figures for additional housing from this source at borough level and across the capital. These can be compared with the findings of Approaches 1 and 2, which looked at past trends:

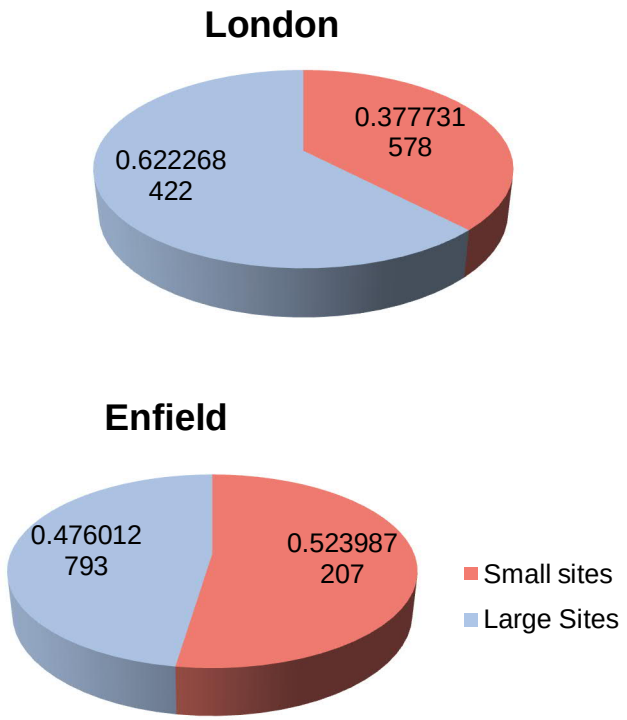
Table 2. Small Sites: Projected 10 year capacity estimates

	Approach 3			Approach 2		Approach 1	
	Modelled	Remaining windfall	Total Capacity	Capacity	Ratio Approach 3 : trend	Capacity	Ratio Approach 3 : trend
Enfield	8,900	930	9,830	2,040*	4.8	2,525**	3.9
London	187,900	57,380	245,730	93,710	2.6	104,592	2.3

*Source: * based on 8 year trend 2008/9-2015/16 ** based on 12 year trend 2004/5-2015/16*

2.32 Some 38% of total housing capacity across London is expected to come from small sites – but in Enfield this rises to 52%, representing an increase of between 3.9 and 4.8 times past trends.

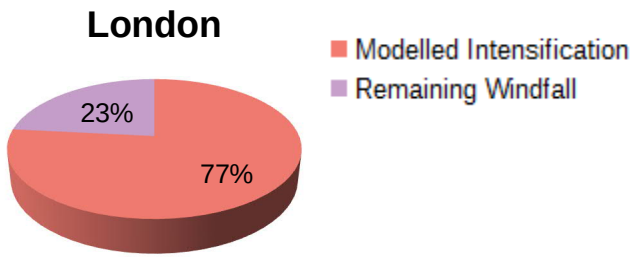
Figure 1. Make up of total housing capacity estimates



2.33 Over the ten year target period, across London as a whole, the modelled intensification component is expected to make up 77% of new homes from small sites – equivalent to 29% of the total housing capacity of the Capital. **But for Enfield, the modelled component is expected to form 91% of the small sites; which would be 47% of the borough's total housing capacity. This is remarkable when you consider that (in contrast to the**

"remaining windfall" component) there is no historical basis or precedent for this scale of delivery from this source:

Figure 2. Make up of estimated small site capacity



2.34 The SHLAA also contains relatively little examination of what these increases might mean "on the ground". Paragraph 6.27 provides an example of annual model outputs for an area currently containing 2,000 (unconverted / undeveloped) houses split evenly between terraced and semi-detached/detached properties. Incremental intensification would lead to 36 additional homes each year. What the SHLAA does not reflect on is that this means an extra 360 homes over the ten year target period – an 18% increase, representing an additional household for every existing 5 to 6 houses in that neighbourhood. The magnitude of this change needs to be recognised.

2.35 In addition, there is no recognition that the distribution of housing which might be suitable for intensification is not even. A significant proportion of existing houses are unlikely to be suitable for infill or particularly conversion – due to factors such as their size, form and relationship to adjoining properties. For instance, blocks of relatively tightly developed, two-storey inter-war semi-detached houses may never be brought forward for conversion to apartments. This inevitably means that to achieve the 1% Growth Assumption overall, conversions and new build would have to be concentrated into certain parts of the selected areas, with an uneven distribution.

Conclusions

2.36 The SHLAA suggests capacity for small site housing development in the Borough of Enfield which would roughly quadruple previous levels of completions from this source. The overwhelming majority of these new homes are suggested to come from the intensification of existing houses in spatially selected areas, based on modelling.

2.37 There is limited analysis of the possible reasons for past delivery rates from small sites. The modelling is based on an assumption and growth factors for which limited justification is provided, and which do not appear to be robust – and yet these are combined to produce the overwhelming majority of the small sites target figures for the Borough. These modelling results do not appear to have been tested in any real-world situations. The outputs are described as capacity estimates – but this process falls well short of the evaluation of the capacity for growth proposed in policy D2 of the draft London Plan. The value of this work as the basis for setting accurate and achievable targets for small site development in the borough is questionable.

3. Draft London Plan Policies Relating to Small Site Development

Draft Policy H2 and the Presumption in Favour of Small Housing Developments

3.1 Draft Policy H2 is a very lengthy, complicated and detailed policy which has been expanded by the "Minor suggested changes" published in July 2018. It covers over two pages of the Plan, comprising eleven parts, many of which contain several sub-sections.

3.2 However what is immediately apparent is the scale of change required through Part D of the policy which refers in turn to Table 4.2 in the Plan and which sets out a London wide annual target of 24,573 dwellings to be delivered on small sites. This represents the near doubling of the amount of development produced from small sites in the best performing of the last 15 years.

3.3 For Enfield the expected rate of development from small sites is even higher with an annual target of 983 dwellings set against an annual delivery rate up to 2016 of 221 dwellings. Therefore closer inspection of the components of Policy H2 is warranted to see if it will deliver what is promised.

Aims and objectives (Part A)

3.4 The opening paragraph of Part A provides a definition; and sets out the overarching aim of the policy for small sites to:

"… play a much greater role in housing delivery to achieve the ten-year housing targets set out in Policy H1 Increasing housing supply"

3.5 Boroughs are urged to "…. pro-actively support well-designed new homes on small sites through both planning decisions and plan-making ...", so as to meet the objectives set out in the remaining sub-sections of the policy:

- "1) significantly increase the contribution of small sites to meeting London's housing needs
- 2) diversify the sources, locations, type and mix of housing supply
- 3) support small and medium-sized housebuilders
- 4) support those wishing to bring forward custom, self-build and community-led housing
- 4A) achieve the targets for small sites set out in Table 4.2."

3.6 **In general, these aims and objectives 1) – 4) are consistent with the NPPF and are considered to be uncontroversial. There is greater concern in relation to the targets** for small sites under objective 4A) which are discussed separately, below.

The Presumption in Favour of Small Housing Developments (Part E)

3.7 The meaning of the Presumption in Favour approach is contained within Section E of the policy. In its first draft form, this appeared to have been loosely modelled along the lines of the Presumption in Favour of Sustainable Development contained within the NPPF. It now reads:

"For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments unless it can be demonstrated that the development would give rise to an unacceptable level of harm that outweighs the benefits of additional housing provision; or where development does not comply with a design code prepared in accordance with part B."

3.8 **The main change to the wording of the policy has been to delete the short list of factors which could outweigh compliance with a design code - "unacceptable level of harm" is no longer restricted to that list.** Design codes do, however, remain central to the policy thrust.

3.9 Although the Presumption in Favour implies a shift in the balance of decisions towards small site development proposals, in practice it is not clear how the consideration of harm would differ from normal application of development plan policies.

Qualifying factors (D, F, HA and HB)

3.10 Before the Presumption in Favour in Section E can be applied, there is a long list of qualifying factors which must be considered. Firstly, the Presumption in Favour may apply to the following types of small housing development:

- D 1) - infill on vacant or underused brownfield sites
- D 2) - increases in the residential density of existing houses within PTALs 3-6, or within 800m of a station or town centre boundary through:

  a) residential conversions

  b) residential extensions

  c) demolitions and redevelopment of existing houses/ancillary buildings

  d) infill within the curtilage of a dwelling house
- D 3) – redevelopment of flats, non-residential buildings and residential gardens

3.11 Development types D 1) and D 3) may benefit from the Presumption in Favour irrespective of their location within the borough.

3.12 Development types D 2) a) – d) are effectively the modelled component of the SHLAA small sites assessment, and benefit from the Presumption in Favour only within the spatially selected areas[3].

3.13 However, even where the qualifying factors in part D of the policy are met, the Presumption in Favour **does not** apply to:

- F1) – designated heritage assets and their settings (other than conversions in conservation areas)
- F 2) – F 4) - schemes for more than 25 homes, or on sites greater than 0.25ha, or not yielding net additional homes
- F 5) - developments outside Class C3 dwelling house use
- F 6) - sites related to the Central Activities Zone strategic functions
- F 7) - designated industrial / employment sites
- F 7) A - changes of use of non-residential buildings
- F 7) B - protected open spaces, including Green Belt and Metropolitan Open Land
- F 7) C - buildings of more than 30m height following redevelopment
- F 7) D - development involving existing homes on social housing estates
- HA a) - developments which do not meet the internal and external private space standards in Policy D4
- HA b) & c) – schemes with do not adhere to cycle and vehicle parking standards
- HA d) - schemes which would not accord with the Agent of Change principles or Policy HC7 relating to the protection of public houses
- HA e) - major scale schemes which would not meet the Air Quality Neutral benchmark for building emissions
- HB - minor developments which do not achieve no net loss of overall green cover major developments which are not in line with Policy G5 Urban Greening
- HC - developments which fail to optimise housing delivery on a site, or prejudice the comprehensive development of a site allocation

3.14 Parts F and H of the policy have been significantly expanded by the Suggested Minor Changes to the draft London Plan of July 2018. Most of this list of 18 criteria are straightforward and precise, which add to clarity and certainty. The greatest uncertainty would relate to the setting of designated heritage assets (F1), and issues of optimal/comprehensive development (HC).

3.15 Irrespective of these criteria and qualifications, it should be remembered that even where the Presumption in Favour does not apply, Policy H2 A might still add weight to the case in favour of a scheme for small site housing development.

3 The wording of part F 1) of the policy suggests that conversions in conservation areas outside the spatially selected areas may benefit from the Presumption in Favour.

3.16 **Consistent with the references in paragraph 6.9 of the SHLAA, draft policy H2 does not contain any restrictions on the amount of intensification development within an area relating to local character effects or quotas.** The approach of Policy H2 to small sites targets and local character is discussed separately below in paragraph 3.29 of this section of the report.

Other parts of Policy H2 (C, G, H)

3.17 Part C of policy H2 seeks to increase planning certainty for applicants. It links, in particular, to objectives A3) and A4) by urging boroughs to identify and allocate small sites; list then on Brownfield Registers; and grant permission in principle / prepare local development orders.

3.18 It should be noted that:

- **some small sites of less than 0.25ha delivering 10 or more dwellings in Enfield have already been identified through the development plan system**
- **even so the majority of small site development arises as windfall opportunities. Thus a combination of unpredictable circumstances lead to the promotion of a small site for development. These opportunities are almost impossible to forecast and so cannot be part of a planned process.**

3.19 Part G of draft policy H2 applies the accessibility requirements contained in draft Policy D5 to all ground floor homes within minor scale small site developments; but applies a lesser standard to homes which are not on the ground floor.

3.20 **It is not clear what the consequences of this approach would be for ground floor homes in minor scale small site developments, which are by definition fewer than 10 dwellings.** The wording of Policy D5 implies that there may be a greater burden on some small site schemes – particularly small new build schemes - than on larger new build developments.

3.21 Part H of policy H2 clarifies that the Policy H6 threshold approach applies to small sites which are major developments (10 or more dwellings); but that affordable housing should only be required from minor small site developments through a tariff system.

Small Site Targets

3.22 Draft London Plan paragraph 4.2.4 notes the relationship between the small sites targets in Table 4.2 and the capacity estimates contained in the 2017 SHLAA, which appear to be identical.

3.23 For policy H2 objective A 4A), the small site targets in Table 4.2 are in large part made up of "windfall" developments. As such they need to satisfy paragraph 48 of the NPPF 2012, which states that:

"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens."

3.24 This is particularly important in boroughs such as Enfield, where as explained in Section 2 of this report:

- 52% of the overall housing target in Table 4.1 is made up of small sites;
- 91% of the small sites target in Table 4.2 (47% of the overall housing target) is based on modelled intensification, rather than on evidence of past trends;
- this would represent roughly a quadrupling of supply from small sites.

3.25 The Draft London Plan sets out its position in relation to small site windfalls in paragraph 4.1.8, referring particularly to increasing the density of existing homes; and relying heavily on the following statement:

"The SHLAA shows that there is capacity across London for approximately 40,000 new homes a year on large sites. Modelling in the SHLAA also shows that there is capacity for development on small sites for 24,500 new homes a year. "

3.26 Paragraph 4.1.8 also offers support for inclusion of windfall assumptions in five year housing trajectories based on the numbers in Table 4.2.

3.27 As set out in Section 2 of this report, there are significant concerns regarding the above statement, given (among other things):

- the limited assessment and analysis in the SHLAA of policy and other factors influencing small site supply
- heavy reliance on intensification of existing housing in selected areas without any real world assessment of the capacity of those neighbourhoods
- a lack of clear justification for the 1% growth rate assumption which underpins the modelling

3.28 This suggests that the small site targets for Enfield do not constitute a realistic allowance, based on compelling evidence of a reliable source of housing – which would place them in conflict with the NPPF 2012.

Approach to Character and Design Codes (B)

3.29 Part B of draft Policy H2 deals with the relationships between small site development and local character. Sub-section B 1) is central to this, requiring boroughs to adopt policies and make decisions which accept change to local character in "appropriate locations", where increases in residential density result from small site development. Supporting paragraph 4.2.5 indicates that this marks a shift in emphasis away from preserving existing character, to delivering well designed new housing within an evolving local character.

3.30 This is echoed elsewhere in the draft London Plan, where local character is seen as something which should be recognised and understood – to guide development in ways which complement, support and strengthen distinctiveness, but not to stifle growth (e.g. policy SD7 4h) for Town centres, policy D1 A12 London's form and characteristics, and policy D6 A1) Optimising density).

3.31 The key tool promoted to deliver this for small sites is "design codes", which play an important part in the application of the Presumption in Favour in policy H2 E. They are also referred to in relation to draft policy D2 Delivering Good Design and policy D3 Inclusive Design. Paragraph 4.26 of the draft London Plan includes significant suggested changes to emphasise their importance – including their role in offering greater clarity and certainty for potential applicants.

3.32 There remains considerable uncertainty surrounding the content, use of and best practice for design codes, including matters such as:

- **what form(s) they might take**
- **the responsibilities, resources and time needed to prepare them**
- **possible requirements for community engagement and adoption**

3.33 This is particularly the case for area-wide design codes, which would be needed to address the quadrupling of the rates of incremental intensification in existing houses, as modelled by the SHLAA and taken up in the draft London Plan. Policy H2 D2) applies the Presumption in Favour of small housing developments to spatially selected areas which cover most of Enfield's land area and housing stock (see section 5 of this Report). This suggests that design codes will have to guide applicants:

- for large numbers of schemes
- with different types of proposal
- in a range of contexts
- covering a variety of design issues which are not limited to those covered by the term "character".

3.34 This role is currently played by the suite of policies contained within the development plan for Enfield – the existing London Plan, the Enfield Core Strategy. If design codes are to largely take over this role, they need to be effective in delivering Good Design; put in place promptly; and have public support for the change they would accommodate. Section 9 and Appendix B includes exemplar work on a design code.

3.35 The main concern in relation to character is that high small sites targets have been set:

- **before there has been a proper capacity assessment of the areas identified for intensification – this would normally be part of the process outlined in policy D2 A;**
- **before design codes have been prepared or their use in this way properly tested;**

This means that it will not be possible to deliver good design which complements and enhances the best aspects of local character and distinctiveness in a context of rapid incremental growth.

4. Current Development Plan Policy Framework for Small Site Development

Key Policies

4.1 The emphasis in this section is on how local policies in the borough of Enfield influence decision-making in relation to small housing development sites.

London Plan

4.2 Policies of the current London Plan are clearly an important part of the framework, but for the purposes of this report, the key ones are just listed below:

- Policy 3.5 Quality and design of housing developments
- Table 3.3 Minimum space standards for new dwellings
- Policy 3.8 Housing choice
- Policy 7.4 Local character
- Policy 7.6 Architecture

Enfield Borough Council Development Plan Documents

4.3 For the determination of planning applications and appeals, the main local development plan documents are the Enfield Core Strategy 2010 – 2025, and the Enfield Development Management Document (DMD).

Enfield Core Strategy (November 2010)

4.4 This document remains in force, but is somewhat outdated, having been adopted eight years ago in the context of the superseded London Plan of February 2008. Inevitably the policies are relatively high-level compared to most contained in the Development Management Document (DMD, see below), but three stand out as being of particular relevance for decision-making in relation to small site housing developments.

- Policy CP30 - Maintaining and Improving the Quality of the Built and Open Environment encourages high quality and design-led development .
- Policy CP4 - Housing Quality similarly seeks high quality design and sustainability for all new homes. However, no specific details are given – the policy defers to relevant guidance in the London Plan, and the forthcoming Enfield Design Guide and the DMD.
- Policy CP5 - Housing Types offers guidance in the proportions of different dwelling types and sizes which the borough council seeks across the market, social rented and intermediate housing sectors. In particular, it seeks the following:
  - Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses , (5-6 persons), 20% 4+ bed houses (6+ persons).
  - Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).
- The policy combines this with the objective to balance densities and the efficient use of land with "… respecting the quality and character of existing neighbourhoods ...", advising that the London Plan Density Matrix will inform the density of proposals for housing developments.

Development Management Document (DMD) November 2014

4.5 This document was adopted in the context of the London Plan 2011 (including minor alterations of 2013), not long before revisions introduced in 2015. The suite of policies with generally greatest relevance to small site housing developments are contained with the housing chapter 2, as follows.

4.6 **DMD 3 Providing a Mix of Different Sized Homes.** This policy needs to be read in conjunction with Core Strategy policy 5. There is a strong emphasis on a design-led approach to maximise the provision of family units (3 bed +), with the policy requiring Design and Access Statements to demonstrate whether or not these can be incorporated into the scheme.

4.7 **DMD5 – Residential Conversions.** This policy provides five criteria which proposals for the conversion of existing residential units into self-contained flats (and HMOs) must meet:

- 1a. Provide a high quality form of accommodation which meets internal floor space standards in the London Plan;
- 1b. Not harm the residential character of the area or result in an excessive number or clustering of conversions. The number of conversions:
  - must not exceed 20% of all properties along any road; and
  - only 1 out of a consecutive row of 5 units may be converted.
- 1c. Not lead to an unacceptable level of noise and disturbance for occupiers and adjoining properties;
- 1d. Incorporate adequate parking and refuse storage arrangements that do not, by design or form, adversely affect the quality of the street scene.
- 2a. (for the conversion of existing family units into self-contained flats). Compensatory provision for family accommodation (3 bedrooms +) is provided within the development.

4.8 Criteria 1b is highlighted because it introduces a form of quota, blurring the lines between on the one hand the number / density of conversions in a locality; and on the other the character of an area. This is the sort of quota approach which the SHLAA para 6.9 suggests may have suppressed conversion rates over recent years.

4.9 **DMD6 – Residential Character.** In this policy, there is a very strong linkage made between density and character, including a requirement to comply with the London Plan density matrix. The policy goes on to list five further criteria which proposals must satisfy:

- A. The scale and form of development is appropriate to the existing pattern of development or setting, having regard to the character typologies
- B. The development delivers a housing output having regard to policies on housing mix
- C. A high quality of design and standard of accommodation is achieved, in line with policies in the London Plan, DMD 8 'General Standards for New Residential Development' and other design polices in the DMD
- D. The density of development has appropriately considered existing or planned transport capacity; and
- E. The density of development takes into account the existing and planned provision of local facilities such as shops, public and private open space, and community, leisure and play.

4.10 Although policy DMD 6 is entitled “Residential character”, it is notable that criteria b., d. and e. - together with most of policy DMD 8 referred to in criteria c. - do not directly address issues of local character.

4.11 **DMD8 – General Standards for New Residential Development.** This policy contains ten criteria, all of which must be met in new residential development. There are three general themes which are most prominent:

- residential amenity – including day/sunlight, outlook and privacy, noise and disturbance as well as amenity space
- design “fit” within the surrounding area – including character and appearance of specific features such as parking, refuse collection, boundary features
- quality of accommodation – including space standards, internal layout and accessibility

4.12 The above policies link with and often cross refer to the following policies:

- DMD 9 – Amenity Space
- DMD 11, DMD 13, DMD 14 – Rear, Roof and Side Extensions
- DMD 37 – Achieving High Quality and Design-Led Development
- DMD 45 – Parking Standards and Layout
- DMD 47 – Access, New Roads and Servicing

Appeal Decisions

4.13 Appeal decisions are of particular interest, because they enable a local authority's approach to decision-making to be compared with that of an independent planning Inspector. It is the case that both decisions take place within the current planning policy framework; and therefore caution is needed when suggesting how these decisions might change under an altered policy regime. It also needs to be recognised that these cases only deal with proposals which have been pursued to appeal – caution is also needed when extrapolating these decisions to the overall range of planning applications. Nevertheless, any patterns, similarities and differences in approach between local planning authorities and Inspectors can be informative.

4.14 A sample of 58 appeal decisions in Enfield was taken, all being housing developments on small sites (less than 0.25ha in site area) decided by Inspectors between 1st October 2017 and 30th September 2018. The sample did not include:

- appeals involving loss of residential units – for instance through change of use of a family dwelling to a house of multiple occupation[4];
- applications for a certificate of lawful use to regularise unauthorised residential development.

4.15 Also, two of the cases were found to involve appeals against non-determination – one of which the Council said they would have granted, and the other they made no views known to the Inspector. These cases were removed from the sample.

4.16 The remaining 56 small site appeals sought permission for a total of 95 net additional dwellings. The largest scheme was to develop a largely vacant plot of 0.19ha to provide nine 2-storey dwellings.

4.17 Of these 56 appeals:

- **10 (18%) were upheld, granting permission for 15 net additional dwellings, representing 16% of the additional dwellings applied for.**
- **this represents rate of success for appellants on "minor" dwelling appeals which is somewhat below the national average of 26% upheld / 25% of houses applied for.**
- **some 46 (82%) of the appeals were dismissed, which would otherwise have provided 80 net additional dwellings.**

4.18 The appeal cases have been examined to explore:

- the main reasons why the applications were refused in the first instance by the borough council – referring to the planning policies cited to in the decision notice; and
- for appeals which were dismissed, the main reasons given by Inspectors - cross-referencing this to policies noted in the appeal decision letter
- what this appeals information might tell us about changes in the approach to small site housing developments contained within the draft London Pan 2017.

Conversion Quotas / Thresholds – Policy DMD5 1.b.

4.19 As part of its capacity assessment of small site potential, the 2017 SHAA (para 6.9) suggests that local quotas or capping levels on conversions of existing housing may have played a part in suppressing completions from this source of housing.

4.20 References to the quotas / thresholds were made in 5 out of the 22 borough refusal notices relating to conversions – though this was never the sole reason for refusal.

4.21 In two of these cases, the Inspectors took a flexible approach, finding that the thresholds were exceeded, but still allowed the appeals because:

- in one case there was more than one conversion per five adjoining dwellings, but less than 20% overall on the street;
- in the other case, although the thresholds were exceeded, no tangible harm was identified as a result.

[4] But did include appeals where there was a loss of family units because of sub-division into flats.

4.22 The other three appeals mentioning quotas/thresholds were dismissed. In two of those cases, the Inspectors did not support this ground for refusal, leaving just one Inspector who did. In any case, in all three instances the Inspectors dismissed the appeals on the poor standard of accommodation and the failure to provide a compensatory family-sized dwelling.

4.23 It is possible the quotas/thresholds were in the mind of the borough council when refusing other applications, even if they were not explicitly referenced in the decision notice. It is also possible that the quotas/thresholds deter some developers from making applications in the first place, or from appealing refusals. **Nevertheless, the pattern of appeal decisions described above tends to indicate that the quota/threshold approach is probably not on its own a major factor in suppressing conversion rates in Enfield; and that Inspectors will generally apply these in a flexible manner.**

Housing Mix – Policies DMD5 2.a., DMD6 b., Core Strategy CP5

4.24 Draft London Plan policy H12 promotes a shift away from prescribing housing mixes in development schemes. This is based on evidence in the 2017 SHMA of the projected mix to meet needs across London, including overcrowding and concealed households, as well as the potential for smaller units to help people wishing to downsize, thereby freeing up larger units.

4.25 The main references to housing mix in the borough council decision notices came in ten out of the 22 refusals of conversion schemes, where compensation is required for the loss of family accommodation (Policy DMD5 2.a.). For one of these cases, Inspector found as a matter of fact that the London Plan space standards for a 3-bed family unit were achieved, so the appeal was allowed. The other nine were dismissed at appeal – 3 of which were dismissed solely due to the failure to provide family-sized accommodation.

4.26 For the other six cases, there were other reasons for dismissal which most commonly included poor quality and size of accommodation, and insufficient amenity space.

4.27 Other than conversions, policy references to housing mix in the borough council refusals were largely absent. One application was refused by the Borough Council on grounds that it did not comply with the mix set out in Core Strategy policy 5. But the Inspector found that the policy mix was a borough-wide, strategic requirement which was unsuitable for this specific site – though the appeal was refused on other grounds.

4.28 This evidence indicates that refusals of small site housing schemes on grounds of housing mix:

- **tend to relate to the failure of conversion schemes to compensate for the loss of ground floor family accommodation; and**
- **in any case are usually accompanied by other reasons for refusal such as poor standard and layout of accommodation.**

4.29 A shift in policy away from retaining/compensating for existing 3-bed family-sized units, particularly in conversion schemes, could yield more smaller dwellings; and it is possible that this could release some currently under-occupied three bed properties elsewhere, by providing more 2-bed units for people to down-size to. However, the appeal decisions indicate that the extent of this change would be limited unless standards of design improve significantly.

Local Character - Policies DMD5 b., DMD6 a.; DMD 7a., DMD8 a., i. & j.

4.30 As described in Section 3 of this report, one of the main changes in the approach to small site housing development put forward in the draft London Plan is to shift the policy emphasis:

- away from protecting existing local character; and
- towards a framework which accepts the evolution of local character through intensification of some areas; whilst
- at the same time delivering local distinctiveness.

4.31 Design codes have been suggested as a mechanism to guide this policy shift.

4.32 The borough council included adverse effects of the character and appearance of the local surrounding area as a reason for refusal in 46 of the 56 appeal cases, confirming that this is a major factor in local decision-making for small sites. This included 9 out of the 10 appeals which were allowed, although in those cases character impacts were never the sole reason for refusal.

4.33 Of the 46 appeal cases which were dismissed, the borough council included harm to local character as a reason for refusal in 37 instances; and Inspectors agreed on 26 of those. These cases included 11 where character impacts eventually formed the only reason for Inspectors dismissing the appeal. However, none of the upheld appeals involved breaches of policy DMD 7 relating to development of garden land, and the impacts that would have on local character.

4.34 This evidence suggests that a different approach to character issues might **enable a greater number of proposals to avoid conflict with local policies, depending on things like the design code wording and requirements. Such a shift does not necessarily have to indicate an abandonment of design quality standards, but would require well prepared design codes to be successful in this respect.**

4.35 However, as reported above, the evidence also shows that there were 26 cases where non-character factors played a part in the dismissal of appeals – usually sub-standard internal space standards or layouts, unacceptable living conditions for new or existing residents, or poor outdoor amenity space provision. These are not factors for which there is a strong possibility of being overcome by a shift in policy, irrespective of changes in the approach to character - they will remain embedded in the London Plan as parts of the Good Growth, high quality design and housing quality and design policies.

Conclusions

4.36 As discussed above, there is currently a suite of development plan policies which are key in the determination of planning applications for housing development on small sites. Examination of a snap-shot of appeal decisions indicates that in the borough of Enfield decision-making within the current planning policy regime is robust and largely supported by Inspectors.

4.37 Changes to policies set out in the draft London Plan 2017 have some potential to increase supply from this source – through shifts in the approach to local character, housing mix, and quotas for conversions. However, the appeal data does not seem to suggest that these changes would lead to the level of increase in supply from small sites needed to meet the targets set out in Table 4.2 of the draft London Plan.

4.38 The evidence also suggests that this potential may be restricted by a number of factors, including the poor quality of schemes coming forward, many of which do not provide adequate standards of amenity, living conditions and other requirements demanded by other policies of the draft London Plan relating to design standards.

5. Case Study Areas

Context within Enfield Borough

5.1 The purpose of this section is, through the identification of case study areas, to form an overview of the potential for delivery of small sites in Enfield. The section provides evidence of the prospective local typologies that may be found as well as the socio-economic characteristics of the study area. This then has led on to more detailed design work on small site opportunity identification and finally some market testing of the viability of small site development relating to market conditions found in two of the three case study areas.

5.2 Policy H2 in the draft London Plan introduces a presumption in favour of small housing developments which provide between one and 25 homes. Spatially selected areas are identified within PTALs 3-6 or within 800m of a station or town centre boundary[5]. AECOM have replicated the 2017 London SHLAA[6] modelling approach to identify the extent of the borough that would be covered by this condition.

5.3 Figure 3 illustrates the combined spatially selected areas across the borough with these conditions. The spatially selected area to which Policy H2 would apply measures 4,132ha in total, which is 50% of the total borough area of 8,220ha.

5.4 The London Borough of Enfield currently comprises 75,459 homes of which 52,401 are situated in areas suitable for redevelopment under the definition of the Small sites policy. To achieve an additional 9,830 homes through the adoption of the small sites policy, for every property in the Borough which the policy covers 19% or nearly 1 in every 5 of all existing households would need via the development forms that small sites envisages to create an additional net dwelling in the plan period to meet the targets.

5.5 Based on this first sift of mapping the Borough has chosen three study areas which meet the locational requirements of policy H2. These study areas are:

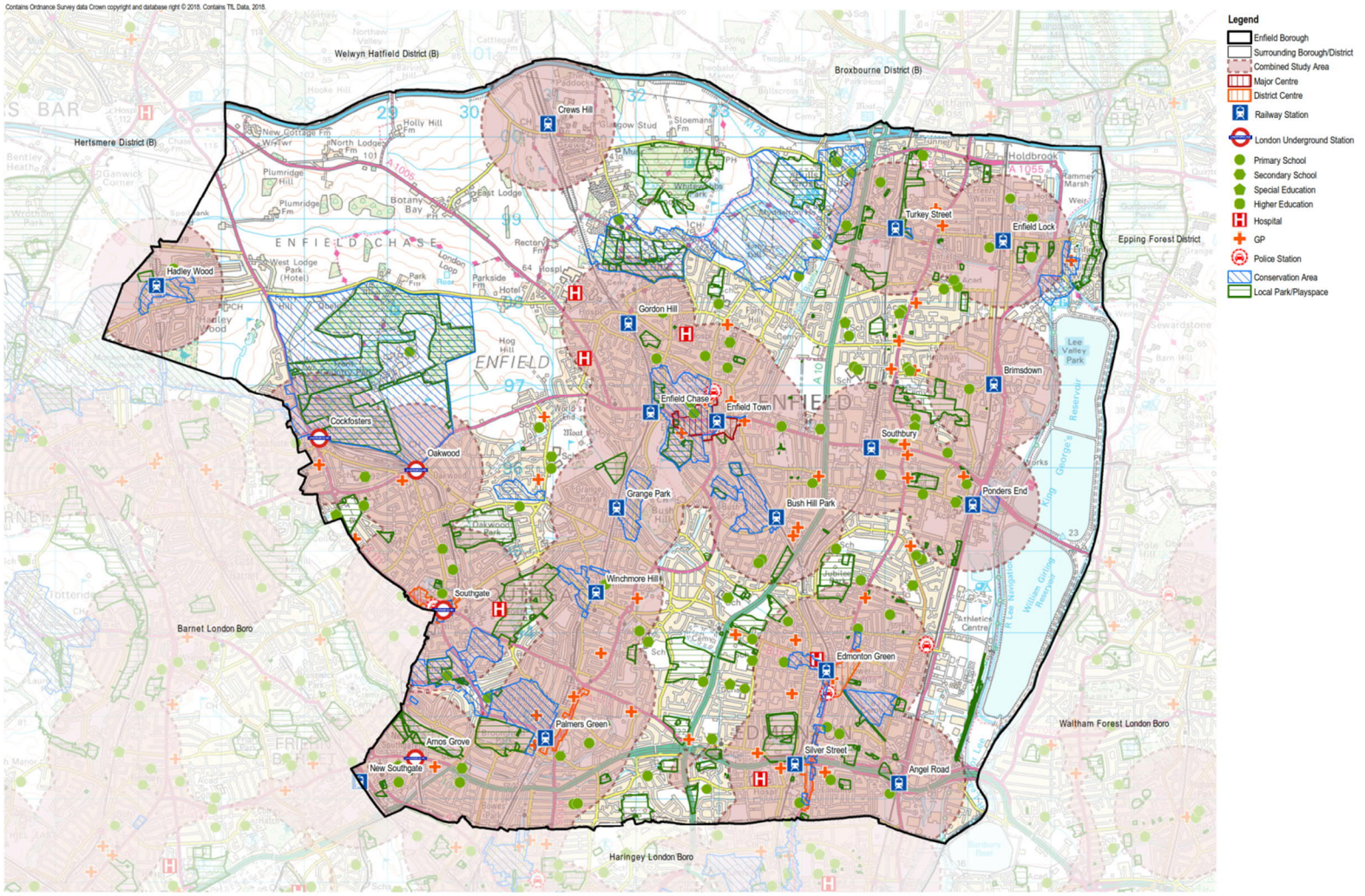
- Crews Hill
- Turkey Street
- Palmers Green.

5.6 Figure 4, Figure 5 and Figure 6 illustrate the areas of search for these study areas reflecting the 800m boundary from the station or town centre boundary edge.

5.7 Crews Hill is not at all typical for a number of reasons but most particularly because large parts of it fall within the Metropolitan Green Belt . If a policy of intensification was to be followed there it would almost certainly be through the development of large rather than small sites and indeed aside from the general presumption against development which arises from the Green Belt, there may otherwise be much more capacity in this area because of the large areas of open land. Therefore whilst this section provides an analysis of the characteristics of Crews Hill area there is no subsequent follow up design or viability assessment of Crews Hill in relation to small site potential.

[5] Defined as District, Major, Metropolitan and International town centres. These are assumed to be Major Town Centre of Enfield Town and District Centres of Angel Edmonton, Edmonton Green, Southgate and Palmers Green in the London Borough of Enfield. https://new.enfield.gov.uk/services/planning/planning-policy-information-town-centres-uses-and-boundaries-review-2013.pdf

[6] https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf



Study Area Identification

London Borough Enfield

AECOM

Figure 3. Small Sites Areas of Search – London Borough of Enfield

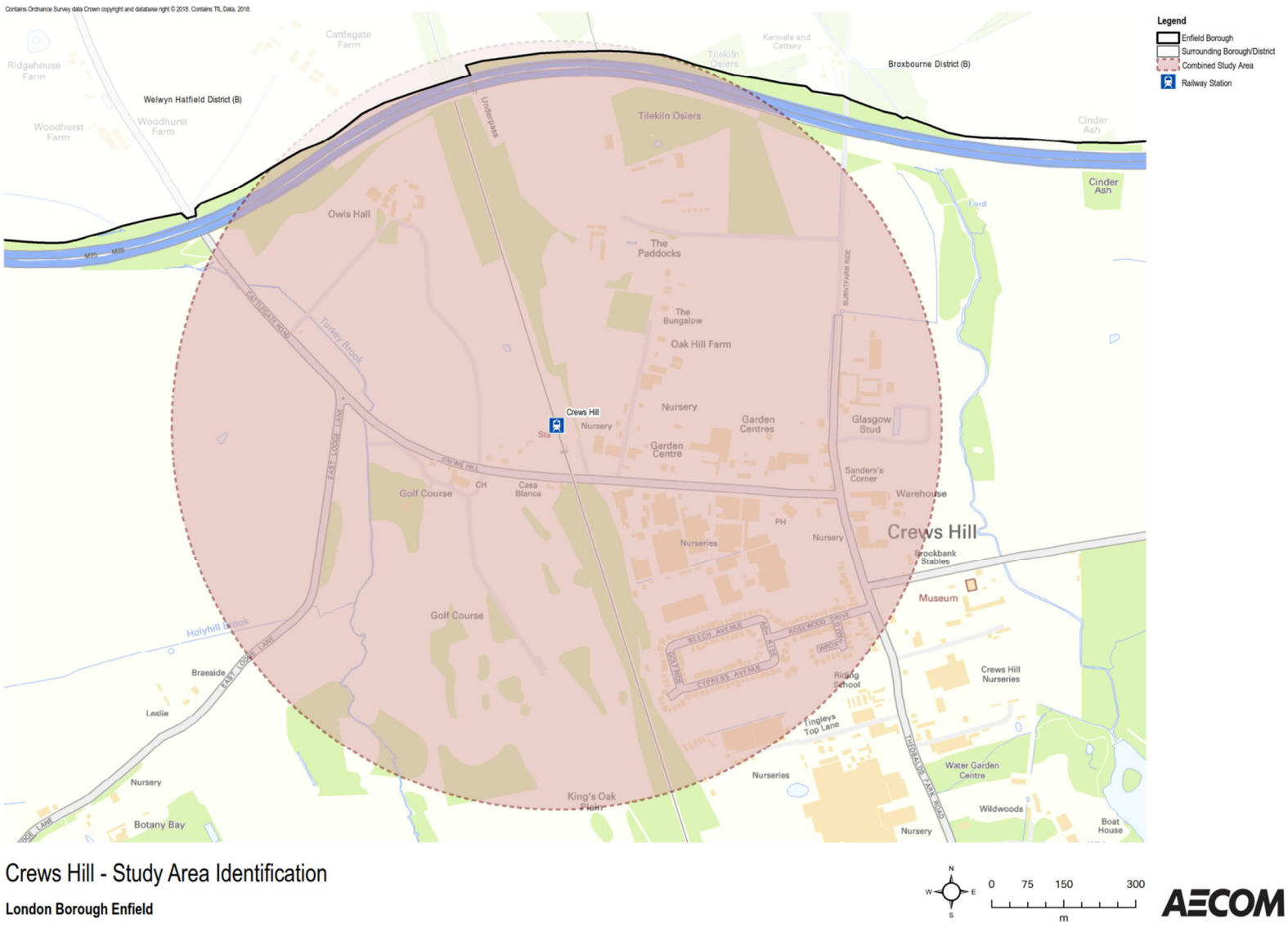


Figure 4. Small Sites Study Area – Crews Hill

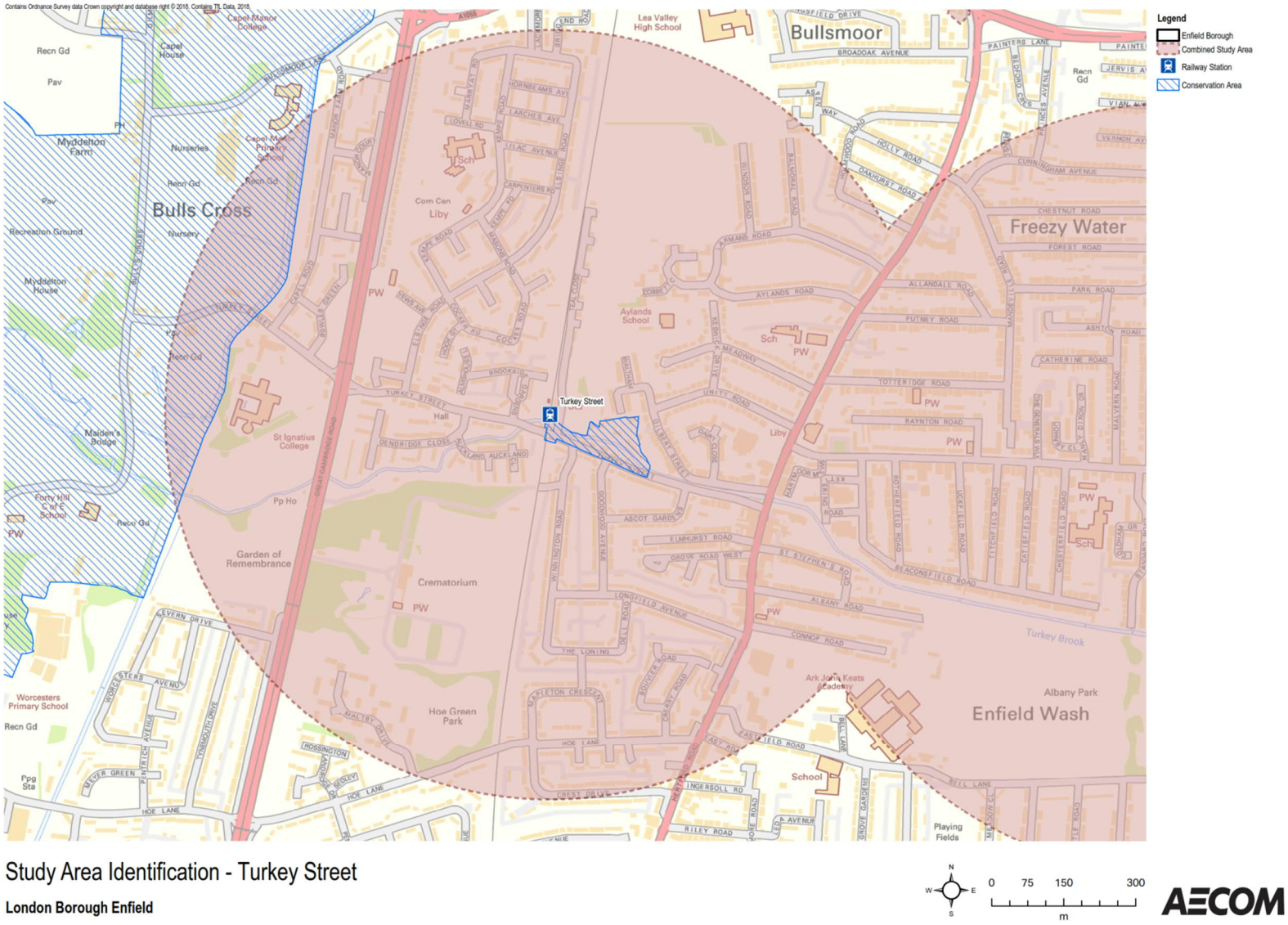


Figure 5. Small Sites Study Area – Turkey Street

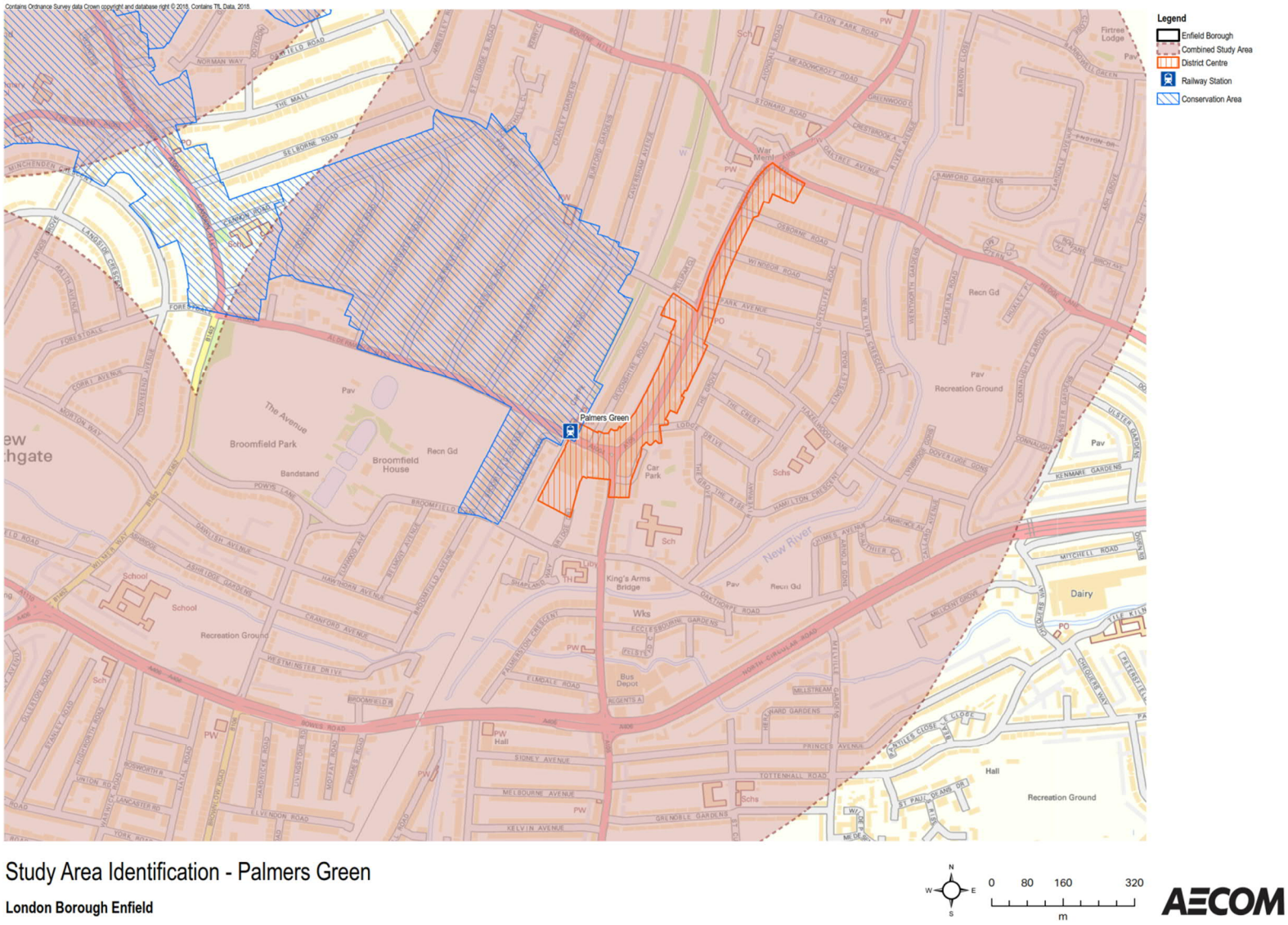


Figure 6. Small Sites Study Area – Palmers Green

Area profiles

Housing Types and Tenures

5.8 The modelling in the 2017 London SHLAA assumes that 1% of the existing stock of houses will increase in density every year in the areas that meet the conditions set out in policy H2. Growth assumptions are applied to semi-detached and terraced houses as recorded in the 2011 Census, irrespective of tenure.

5.9 Unfortunately the 2011 Census data does not allow a subdivision of output area data to be able to map the areas of semi-detached and terraced houses with any accuracy. However, the Enfield Characterisation Study (Final Report | February 2011)[7] classification of urban and landscape typologies provides a useful insight into the variety of characters found across an area.

5.9.1 Within the residential category there is a clear distinction between those areas which follow a conventional perimeter block layout (i.e. where the fronts of buildings face directly on to the street and the backs are contained within the centre of the street block) and those (typically more modern) areas which have a looser free form structure (i.e. where the relationship between building fronts and edges is not defined by street layout), either as cul-de-sacs or more open plan layouts. The perimeter block form typically provides a clear and legible environment with a clear distinction between public and private space and a good network of streets that makes pedestrian movement easy. By contrast the free form areas tend to lose this clarity of structure, often at the expense of legibility, permeability or both.

5.9.2 The perimeter block classification is then broken down further to reflect the various densities found in the borough, ranging from tight Victorian terraces through to low density, suburban inter-war development.

5.10 Figure 7 illustrates the three study areas overlaid with the Enfield Characterisation Study residential categories. Those categories which could be reasonably assumed to include semi-detached and terraced houses, and therefore subject to the 1% assumption of intensification of existing stock are as shown in purple shades. The categories which are assumed to include existing flats, maisonettes and apartments and therefore not subject to policy H2 are shown in blue and grey.

- Crews Hill – a very small part of the study area (9ha) would be subject by policy H2.
- Turkey Street – potentially up to 107ha would be subject by policy H2. This is 51% of the total land within the 800m boundary.
- Palmers Green - potentially up to 129ha would be subject by policy H2. This is 61% of the total land within the 800m boundary.
- Across the combined 800m boundary study areas a total of 245ha would be subject by policy H2. This is 39% of the total land areas.

Table 3. Proportion of the Study Areas potentially subject to Policy H2

Study Area	Residential Type	Area (ha)	Study Area %
Crews Hill	Classic Suburban	8.98	4%
	TOTAL	**8.98**	**4%**
Turkey Street	Classic Suburban	21.85	10%
	Garden City	70.01	33%
	Urban Terrace	15.4	7%
	TOTAL	**107.26**	**51%**
Palmers Green	Classic Suburban	45.28	22%
	Garden City	0.68	0%
	Urban Terrace	82.73	39%
	TOTAL	**128.69**	**61%**
Grand Total		**244.93**	**39%**

Source: AECOM (2018)

[7] https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf

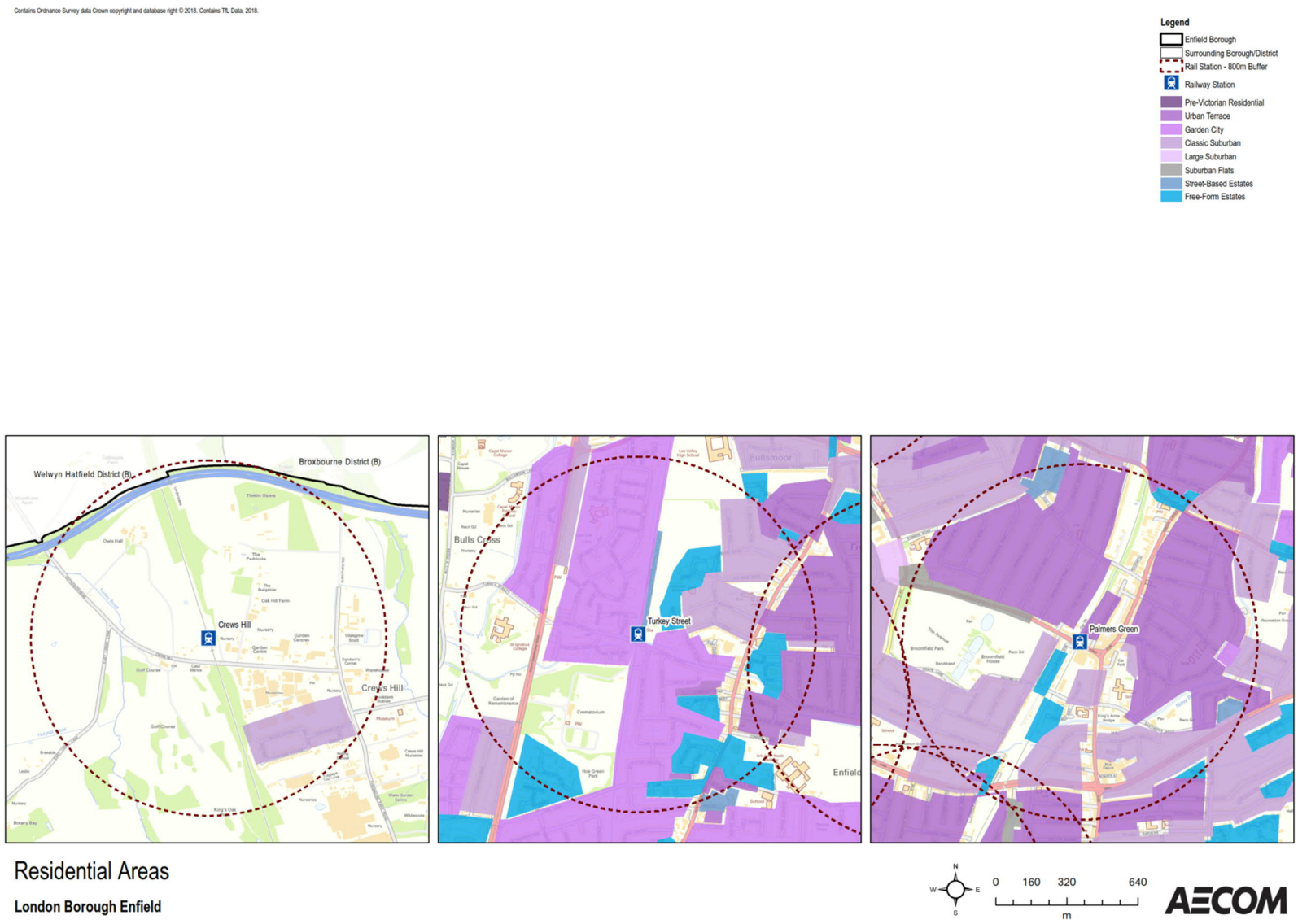


Figure 7. Small Site Study Areas overlaid with the Enfield Characterisation Study (Residential)

Land Use

5.11 Figure 8, Figure 9 and Figure 10 illustrate the three study areas overlaid with the Enfield Characterisation Study mapping for land use, mixed urban areas and business and industry and green space categories.

- Crews Hill is predominantly open space.
- Turkey Street is predominantly residential with town centre driven mixed-use.
- Palmers Green is predominantly residential with town centre driven mixed-use and industrial/institutional land uses.

Transport and Accessibility

5.12 Figure 11 illustrates the three study areas overlaid with Public Transport Accessibility levels (2015). The GLA SHLAA mapping uses a forecast PTAL.

- Crews Hill has PTAL levels of 1a and 1b.
- Turkey Street has PTAL levels of 1b, 2 and 3.
- Palmers Green has PTAL levels of 2, 3 and 4.

Figure 8. Small Site Study Areas overlaid with the Enfield Characterisation Study (Land Use)

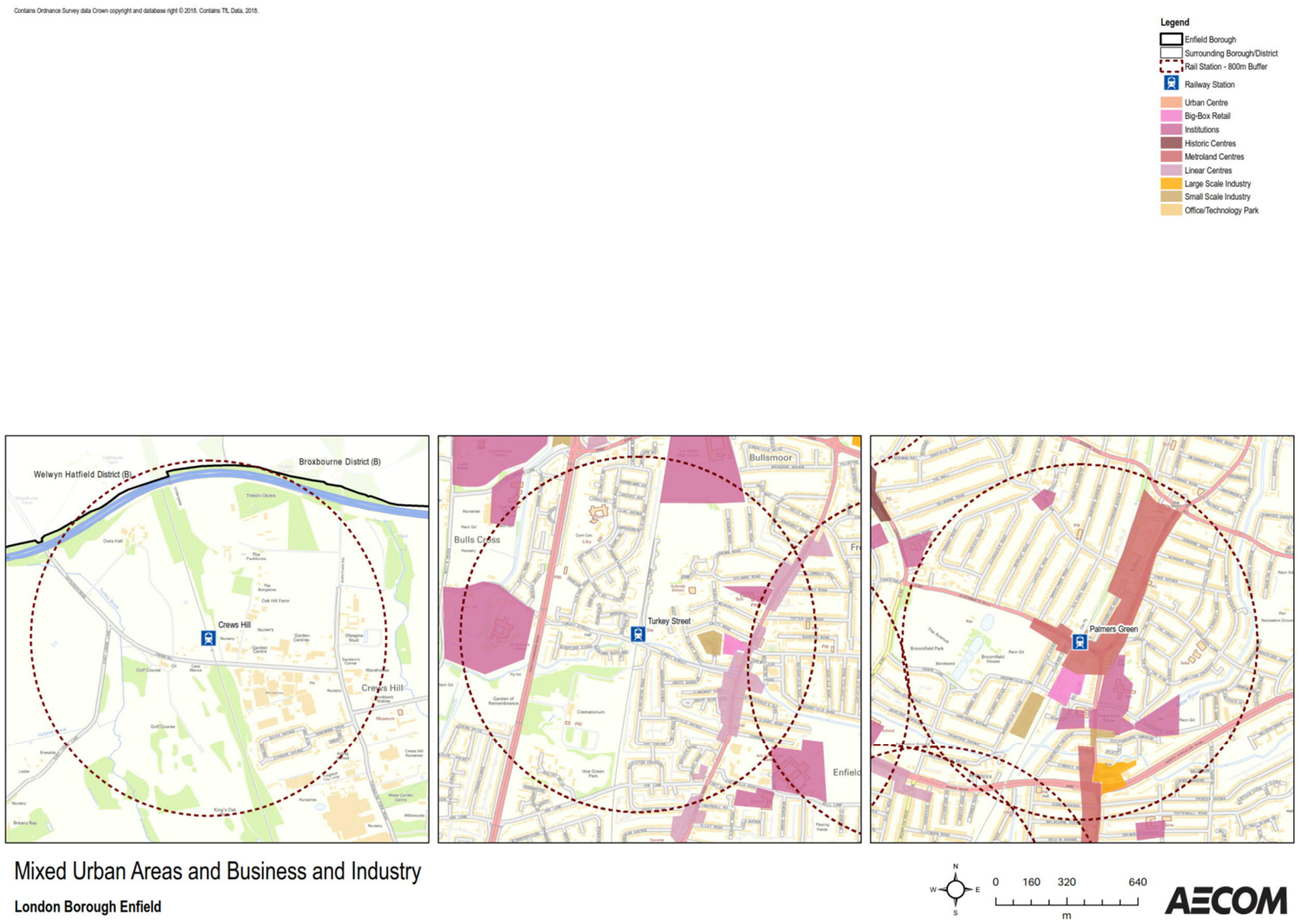


Figure 9. Small Site Study Areas overlaid with the Enfield Characterisation Study (Mixed Urban Areas and Business and Industry)

Figure 10. Small Site Study Areas overlaid with the Enfield Characterisation Study (Green Space)

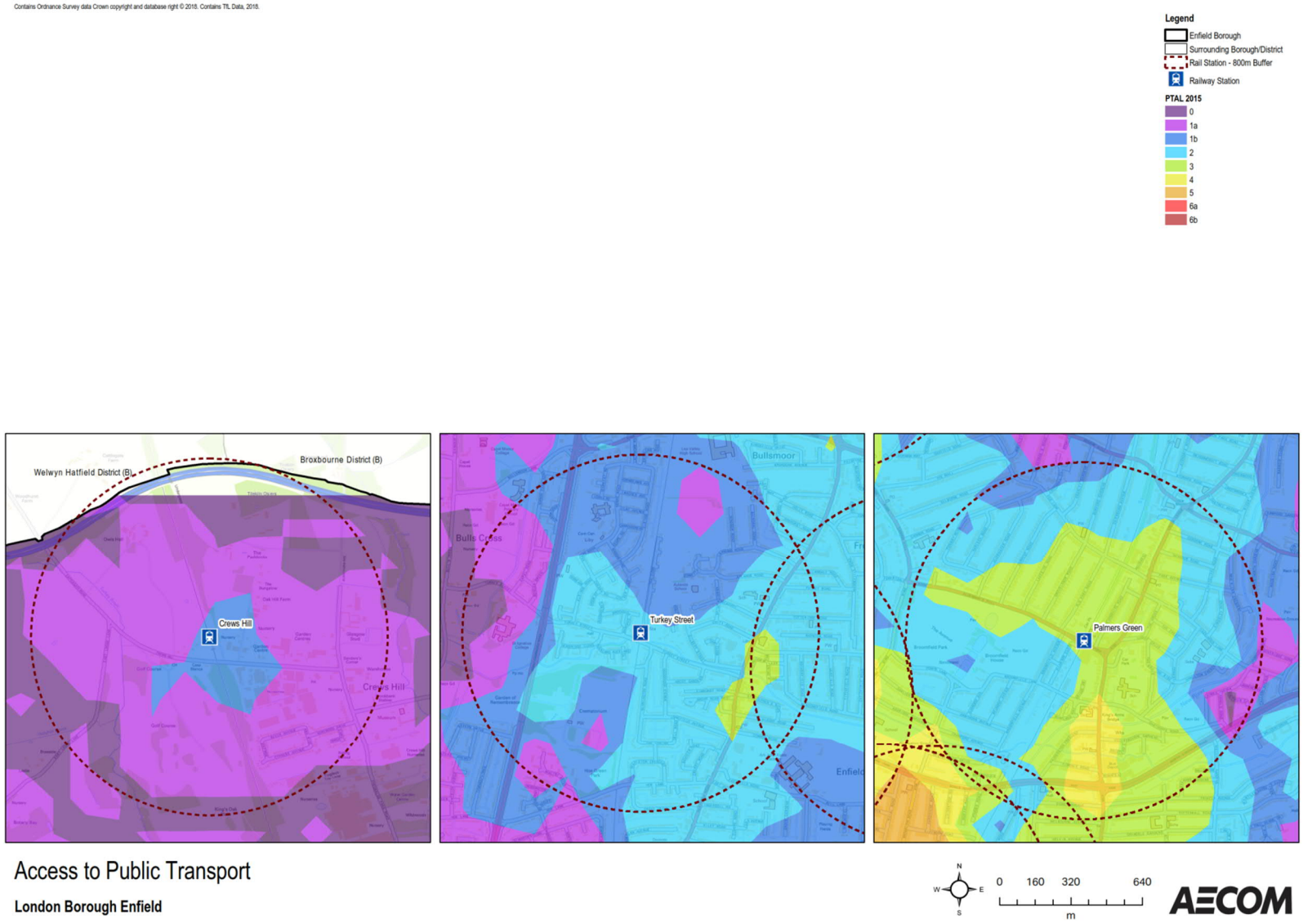


Figure 11. Small Site Study Areas overlaid with the Enfield Characterisation Study (Green Space)

Population

5.13 Figure 12, Figure 13 and Figure 14 illustrates the three study areas overlaid with Index of Multiple Deprivation Area levels, Housing Tenure and Population Density.

5.14 The Indices of Deprivation 2015 provide a set of relative measures of deprivation for small areas (Lower-layer Super Output Areas) across England, based on seven different domains of deprivation:

- Income Deprivation
- Employment Deprivation
- Education, Skills and Training Deprivation
- Health Deprivation and Disability
- Crime
- Barriers to Housing and Services
- Living Environment Deprivation

5.15 Combining information from the seven domains produces an overall relative measure of deprivation, the Index of Multiple Deprivation (IMD). The IMD is a relative measure of deprivation. This means it can tell if one area is more deprived than another but not by how much. IMD is designed to identify aspects of deprivation, not affluence. It is important to remember that IMD is a relative not an absolute measure of deprivation. Being a relative measure, there will always be, for example, 10% of areas that are defined as the most deprived 10%, even if significant improvements are made to the absolute levels of deprivation in the country.

5.16 The borough as a whole has deprivation spread across four bands (worst 10%, worst 25%, worst 50% and least deprived). There are pockets of relatively high deprivation in the south and east of the borough. Whereas in the central and western parts of the borough there is little deprivation.

- Crews Hill has an IMD score of 3 –
- Turkey Street has IMD scores of 1, 2 and 3.
- Palmers Green has IMD scores of 3, 5, 7 and 9.

5.17 The Enfield Characterisation Study[8] identified a picture of deprivation divide in the borough - the working class suburbs established in the south east of the borough have seen much redevelopment over their history, but with little positive impact in their deprivation ranking.

5.18 Figure 13 illustrates the extent of Council or social housing across the study areas, highlighting the concentration of housing rented from Housing Associations or Registered Social Landlords Social housing. There is a higher incidence of public sector owned housing in the Turkey Street study area.

5.19 Density in the borough generally increases as from south and east, with the highest density associated with neighbourhoods of terraced housing and high rise tower blocks. Palmers Green has the highest population density of the study areas.

[8] https://new.enfield.gov.uk/services/planning/planning-policy-information-enfield-characterisation-study-parts-1-4-february-2011.pdf

Figure 12. Small Site Study Areas overlaid with the Enfield Characterisation Study (IMD)

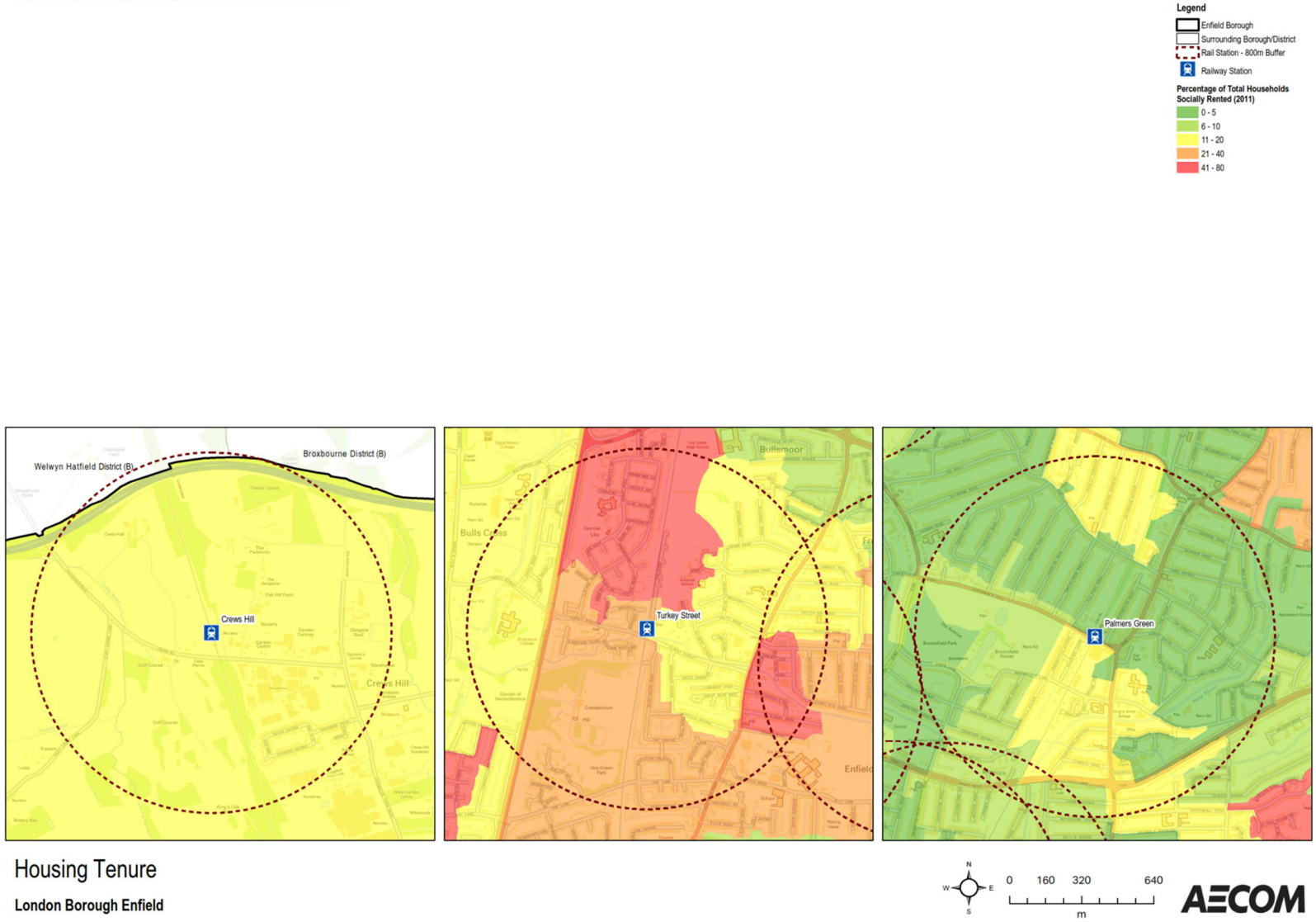


Figure 13. Small Site Study Areas overlaid with the Enfield Characterisation Study (Housing Tenure)

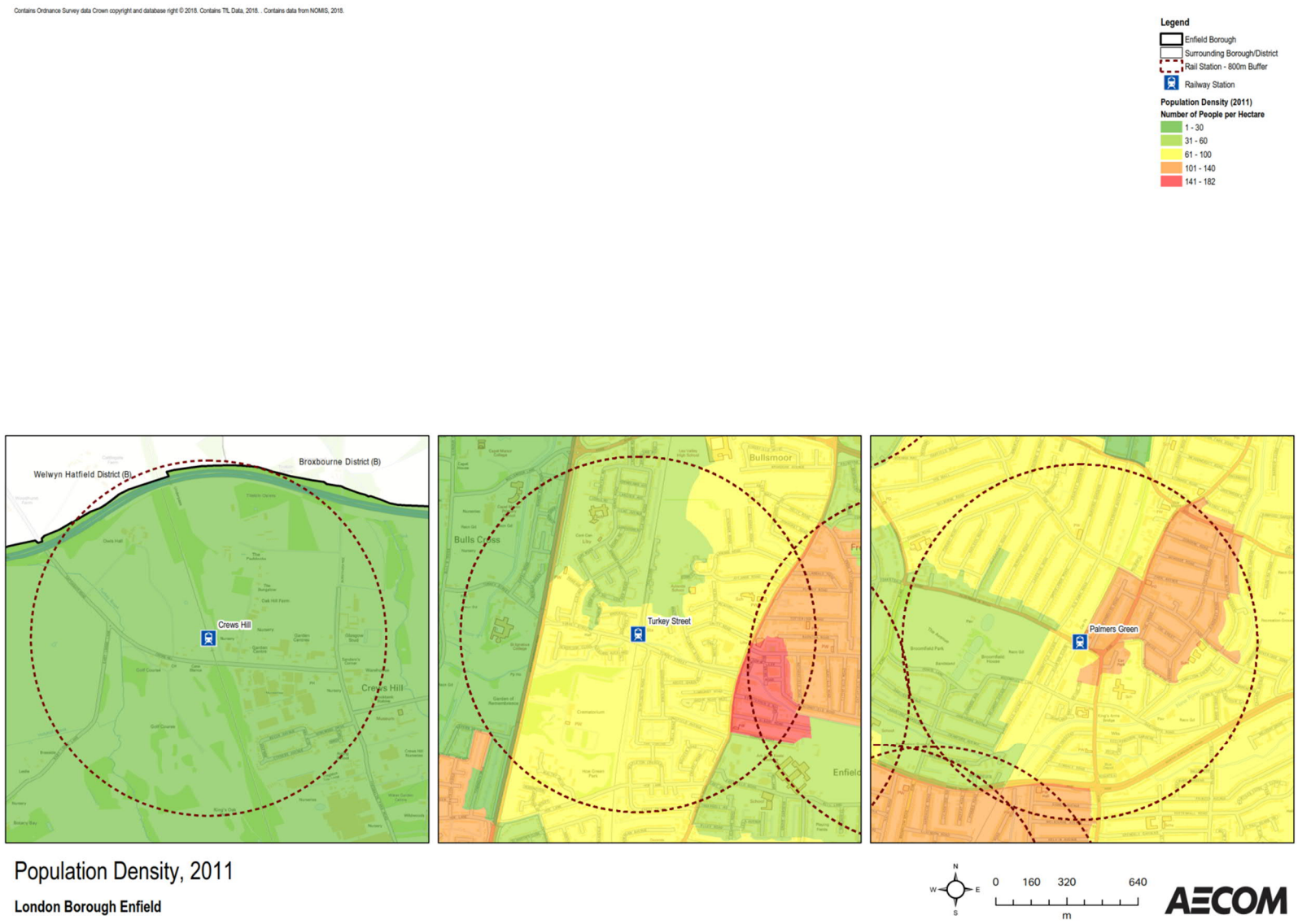


Figure 14. Small Site Study Areas overlaid with the Enfield Characterisation Study (Population Density)

Other Infrastructure

5.20 Each study area has been reviewed for existing and surplus capacity in a range of social and community infrastructure to support an increase in population as a result of policy H2.

5.21 The categories of social and community infrastructure reviewed include:

- Children's Centres and Local Authority Nurseries
- Primary Schools
- Secondary Schools
- GP practices
- Public Libraries

5.22 These facilities are chosen as they are:

- More than proportionately impacted by an increase in population due to development, with new residents presenting as users of the facility after occupation;
- Those facilities which are provided within local communities based on catchment planning; and
- Funded through initial contributions from Section 106 payments or undertakings and/or Community Infrastructure Levy projects.

5.23 We have not assessed such facilities as emergency services, hospital capacity or sports provision etc. These are planned on geographies larger than the study area boundaries below e.g. emergency response times or Clinical Commissioning Groups, and are generally funded on the basis of annual budgets related to population growth.

5.24 Table 4 indicates the social infrastructure capacity within the 800m boundary of the study areas and the capacity available at the borough-wide level. Figure 15 illustrates the location and (for primary and secondary schools) the surplus capacity of the facilities.

- Crews Hill – The available spaces at St John's CofE Primary School are included in the table even though they are outside the 800m boundary of the mapping.
- Turkey Street – benefits from surplus capacity in secondary and sixth form education and space on GP lists which could support new population arising from the intensification of existing housing.
- Palmers Green - benefits from some capacity in secondary and sixth form education and space on GP lists which could support new population arising from the intensification of existing housing.

5.25 Borough-wide there are secondary & sixth form spaces available which could support new population arising from the intensification of existing housing. Parental choice and school competition would support admissions from across the borough and outside of the borough.

5.26 Even with the parental choice agenda, it is reasonable to assume that new primary school capacity will need to be provided in those areas which see a significant increase in housing stock as a result of policy H2. This will require monitoring to:

a. Collect details on the levels and unit size assumptions of intensification taking in order to determine the increase in population and school age population; and

b. Identify suitable sites for new school provision and/or existing schools with the potential to expand to meet new demands.

Table 4. Social Infrastructure capacity

Study Area	Early Years	Primary	Secondary & Sixth Form	GPs	Library
Crews Hill	0	11	0	0	0
Turkey Street	5	8	1,323	3,700	3
Palmers Green	4	-3	927	24,000	4
Borough wide	**22 Nurseries**	**796 Places**	**6,293 Places**	**94,000 List Size**	**16 Libraries**

Source: AECOM 2018[9]

[9] Using data sources including: https://get-information-schools.service.gov.uk/ and https://www.nhs.uk/service-search/ and Department for Digital, Culture, Media & Sport, 2016

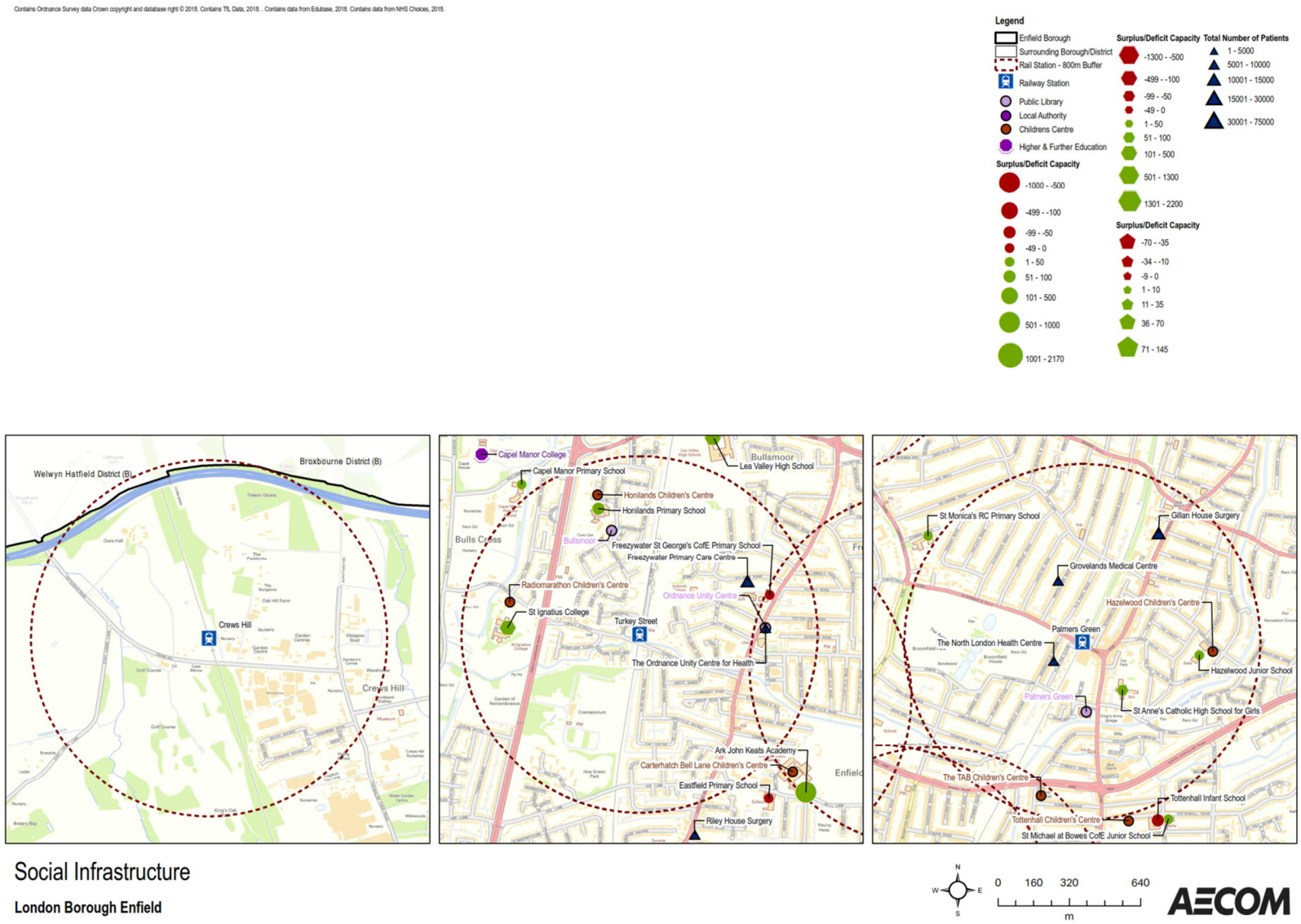


Figure 15. Small Site Study Areas - Social Infrastructure facilities and capacity

6. Detailed Capacity Assessment within the Palmers Green Study Area.

6.1 Urban designers Farrells have been commissioned to undertake a more detailed assessment of the potential for intensification and uplift in housing numbers within a suburban block in the Palmers Green Study area. Their report is enclosed at Appendix A.

6.2 The block that was studied lies close to Palmers Green Station and was selected because it appeared to be typical of the type of private housing found both in Palmer's Green and Turkey Street. The original block, when completed sometime before 1938, had 68 houses, to which a further 6 dwellings have been added to date. However there has been many other small developments with owners extending their homes. Farrells have identified potential for combining properties to create redevelopment sites which if developed could result in the addition of a further 30 dwellings net, all apartments .

6.3 Their conclusions are:-

- In the last 80 to 100 years since this urban block has been constructed, despite the huge pressures for housing, relaxation of planning law and the introduction of permitted development, this suburban block has, to date, delivered an uplift of dwellings of just 6. (9%)
- Design is not the limiting factor to intensification. Occupiers generally want to improve their dwellings by extending them to provide larger kitchen diners, additional bedrooms or games rooms, conservatories or utilities and/or toilet accommodation. The complexities of land acquisition and financial viability probably explain the lack of appetite in this instance to convert or extend properties for purposes of increasing unit numbers.
- Over time, it is possible to consider that these considerable hurdles can be overcome and the conditions will exist where more intense typologies can start to yield an increase in housing numbers. However, there is no way of predicting when this may occur and it is unreasonable to rely on the natural run of things to deliver a significant uplift in housing unit numbers in any sensible time scale,
- This study, for reasons of time and purpose of responding to the draft London Plan Examination in Public, has been confined to one "typical" case study areas in Enfield. However, the city fabric is not uniform and constantly evolving. There are a range of differing urban intensification opportunities and situations across the Borough that range from industrial, brownfield, green to greenbelt sites. In order to develop a clearer picture of the quantity of development that these areas can deliver, a borough wide study as part of Local Plan evidence preparation will be required that examines the availability and potential of such sites to deliver housing in the borough over the next two Local Plans periods.

6.4 These findings on the design capacity of an area are consistent with the findings of the GLA and also may reflect the anticipated yield that other London Boroughs have identified as capacity in their areas (e.g. through the work that Croydon has undertaken in producing it's Suburban Design Guide SPD.

6.5 The reasons why these opportunities are unlikely to be realised in the short to medium term form part of the discussion in the next section.

7. Deliverability and financial assessment of the small sites opportunities

7.1 Planning, development and funding are complex interactive processes in the delivery of housing, with volatility in the market place creating challenges to confidence and the willingness to take risk to develop. This is well evidenced and understood and indeed the Government and the Mayor have put in place a number of financial incentives to aid delivery in addition to seeking to free up planning processes.

7.2 Such financial incentives are not generally available to developers of the smallest of sites. For instance the Housing Growth Partnership, which specifically invests in small builders, has thresholds which would appear to dis-apply a significant amount of the development expected through London Plan 2017 Policy H2. This is discussed in the next section.

7.3 Equally the Mayor's own Small Sites, Small Builders scheme is aimed principally at encouraging public landowners to support small builders. As the majority of small sites in Enfield expected to emerge through urban intensification are held privately, this initiative, whilst welcome, is not expected to bring a significant flow of new small sites onto the market.

7.4 Therefore the purpose of the discussion in this section is to look at evidence which may indicate, in the absence of significant public interventions, how the market will respond to the H2 policy. In Enfield. This work has been undertaken by JLL on behalf of Enfield.

7.5 The methodology adopted by JLL in this exercise has been to undertaken a series of residual valuations for a range of properties from a 1 bed apartment through to a 4- bed house using average values in the Borough of Enfield that would be applicable to Small Sites. The residual values that have been generated are a product of the forecast sales value less the forecast constructions costs, fees and developers profit. This then produces a plot value that could be paid by the developer to the landowner for each typology as the land acquisition price in a viable scheme.

7.6 The costs, fees and margins are those that are adopted as standard industry amounts relevant to comparable developments in the London market place. The values are based on average sales values £/sq.ft. and unit sizes for private housing and apartments in Enfield. When undertaking the valuations for the delivery of affordable housing types a blended mix of 60% social rent and 40% shared ownership has been used as required by LB Enfield policy, excluding any grant funding.

7.7 In total some 12 residual valuations have been undertaken, 6 for private dwellings and 6 for affordable housing. These are set out overleaf.

Private Sale Dwellings		Affordable Dwellings	
Property Type One Bed Apart		Property Type One Bed Apart	
Net Additional Dwellings (NAD)	1	Net Additional Dwellings (NAD)	1
Average Net Size sq ft	550	Average Net Size sq ft	550
Average Gross Build area sq ft	660	Average Gross Build area sq ft	660
Average Sale Value £ sq ft	£ 545	Average Sale Value £ sq ft	£ 300
Total Gross Development Value	£ 299,750	Total Gross Development Value	£ 164,863
Total Gross Development Value	£ 299,750	Total Gross Development Value	£ 164,863
Construction Cost at £205 sq ft	£ 135,300	Construction Cost at £200 sq ft	£ 132,000
Professional Fees at 10% of Cost	£ 13,530	Professional Fees at 12% of Cost	£ 15,840
Developers Profits at 18% of GDV	£ 53,955	Developers Profits at 12% of GDV	£ 19,784
Interest Charges at 4% of GDV	£ 11,990	Interest Charges at 4% of GDV	£ 6,595
Sales and marketing Fees @2% of GDV	£ 5,995	Sales and marketing Fees @2% of GDV	£ 3,297
Purchaser costs @ 6% of GDV	£ 17,985	Purchaser costs @ 6% of GDV	£ 9,892
Residual Land Value/ Sellers Aspiration	£ 60,995	Residual Land Value/ Sellers Aspiration	-£ 22,545
Value Per Plot	£ 60,995	Value Per Plot	-£ 22,545
Plot Value as % of GDV	20.35%	Plot Value as % of GDV	-13.67%

Private Sale Dwellings		Affordable Dwellings	
Property Type Two Bed Hse		Property Type Two Bed Hse	
Net Additional Dwellings (NAD)	1	Net Additional Dwellings (NAD)	1
Average Net Size sq ft	850	Average Net Size sq ft	850
Average Gross Build area sq ft	850	Average Gross Build area sq ft	850
Average Sale Value £ sq ft	£ 470	Average Sale Value £ sq ft	£ 259
Total Gross Development Value	£ 399,500	Total Gross Development Value	£ 219,725
Total Gross Development Value	£ 399,500	Total Gross Development Value	£ 219,725
Construction Cost at £185 sq ft	£ 157,250	Construction Cost at £185 sq ft	£ 157,250
Professional Fees at 10% of Cost	£ 15,725	Professional Fees at 12% of Cost	£ 18,870
Developers Profits at 18% of GDV	£ 71,910	Developers Profits at 12% of GDV	£ 26,367
Interest Charges at 4% of GDV	£ 15,980	Interest Charges at 4% of GDV	£ 8,789
Sales and marketing Fees @2% of GDV	£ 7,990	Sales and marketing Fees @2% of GDV	£ 4,395
Purchaser costs @ 6% of GDV	£ 23,970	Purchaser costs @ 6% of GDV	£ 13,184
Residual Land Value/ Sellers Aspiration	£ 106,675	Residual Land Value/ Sellers Aspiration	-£ 9,129
Value Per Plot	£ 106,675	Value Per Plot	-£ 9,129
	26.70%	Plot Value as % of GDV	-4.15%

Private Sale Dwellings		Affordable Dwellings	
Property Type Two Bed Apart		Property Type Two Bed Apart	
Net Additional Dwellings (NAD)	1	Net Additional Dwellings (NAD)	1
Average Net Size sq ft	710	Average Net Size sq ft	710
Average Gross Build area sq ft	852	Average Gross Build area sq ft	852
Average Sale Value £ sq ft	£ 500	Average Sale Value £ sq ft	£ 275
Total Gross Development Value	£ 355,000	Total Gross Development Value	£ 195,250
Total Gross Development Value	£ 355,000	Total Gross Development Value	£ 195,250
Construction Cost at £200 sq ft	£ 170,400	Construction Cost at £195 sq ft	£ 166,140
Professional Fees at 10% of Cost	£ 17,040	Professional Fees at 12% of Cost	£ 19,937
Developers Profits at 18% of GDV	£ 63,900	Developers Profits at 12% of GDV	£ 23,430
Interest Charges at 4% of GDV	£ 14,200	Interest Charges at 4% of GDV	£ 7,810
Sales and marketing Fees @2% of GDV	£ 7,100	Sales and marketing Fees @2% of GDV	£ 3,905
Purchaser costs @ 6% of GDV	£ 21,300	Purchaser costs @ 6% of GDV	£ 11,715
Residual Land Value/ Sellers Aspiration	£ 61,060	Residual Land Value/ Sellers Aspiration	-£ 37,687
Value Per Plot	£ 61,060	Value Per Plot	-£ 37,687
Plot Value as % of GDV	17.20%	Plot Value as % of GDV	-19.30%

Private Sale Dwellings		Affordable Dwellings	
Property Type Three Bed Hse		Property Type Three Bed Hse	
Net Additional Dwellings (NAD)	1	Net Additional Dwellings (NAD)	1
Average Net Size sq ft	1100	Average Net Size sq ft	1100
Average Gross Build area sq ft	1100	Average Gross Build area sq ft	1100
Average Sale Value £ sq ft	£ 460	Average Sale Value £ sq ft	£ 253
Total Gross Development Value	£ 506,000	Total Gross Development Value	£ 278,300
Total Gross Development Value	£ 506,000	Total Gross Development Value	£ 278,300
Construction Cost at £185 sq ft	£ 203,500	Construction Cost at £185 sq ft	£ 203,500
Professional Fees at 10% of Cost	£ 20,350	Professional Fees at 12% of Cost	£ 24,420
Developers Profits at 18% of GDV	£ 91,080	Developers Profits at 12% of GDV	£ 33,396
Interest Charges at 4% of GDV	£ 20,240	Interest Charges at 4% of GDV	£ 11,132
Sales and marketing Fees @2% of GDV	£ 10,120	Sales and marketing Fees @2% of GDV	£ 5,566
Purchaser costs @ 6% of GDV	£ 30,360	Purchaser costs @ 6% of GDV	£ 16,698
Residual Land Value / Sellers Aspiration	£ 130,350	Residual Land Value/ Sellers Aspiration	-£ 16,412
Value Per Plot	£ 130,350	Value Per Plot	-£ 16,412
Plot Value as % of GDV	25.76%	Plot Value as % of GDV	-5.90%

Private Sale Dwellings			Affordable Dwellings		
Property Type Three Bed Apart			Property Type Three Bed Apart		
Net Additional Dwellings (NAD)		1	Net Additional Dwellings (NAD)		1
Average Net Size sq ft		925	Average Net Size sq ft		925
Average Gross Build area sq ft		1110	Average Gross Build area sq ft		1110
Average Sale Value £ sq ft	£	460	Average Sale Value £ sq ft	£	253
Total Gross Development Value	£	425,500	Total Gross Development Value	£	234,025
Total Gross Development Value	£	425,500	Total Gross Development Value	£	234,025
Construction Cost at £200 sq ft	£	222,000	Construction Cost at £195 sq ft	£	216,450
Professional Fees at 10% of Cost	£	22,200	Professional Fees at 12% of Cost	£	25,974
Developers Profits at 18% of GDV	£	76,590	Developers Profits at 12% of GDV	£	28,083
Interest Charges at 4% of GDV	£	17,020	Interest Charges at 4% of GDV	£	9,361
Sales and marketing Fees @2% of GDV	£	8,510	Sales and marketing Fees @2% of GDV	£	4,681
Purchaser costs @ 6% of GDV	£	25,530	Purchaser costs @ 6% of GDV	£	14,042
Residual Land Value/ Sellers Aspiration	£	53,650	Residual Land Value/ Sellers Aspiration	-£	64,565
Value Per Plot	£	53,650	Value Per Plot	-£	64,565
Plot Value as % of GDV		12.61%	Plot Value as % of GDV		-27.59%

Private Sale Dwellings			Affordable Dwellings		
Property Type Four Bed Hse			Property Type Four Bed Hse		
Net Additional Dwellings (NAD)		1	Net Additional Dwellings (NAD)		1
Average Net Size sq ft		1300	Average Net Size sq ft		1300
Average Gross Build area sq ft		1300	Average Gross Build area sq ft		1300
Average Sale Value £ sq ft	£	450	Average Sale Value £ sq ft	£	248
Total Gross Development Value	£	585,000	Total Gross Development Value	£	321,750
Total Gross Development Value	£	585,000	Total Gross Development Value	£	321,750
Construction Cost at £185 sq ft	£	240,500	Construction Cost at £185 sq ft	£	240,500
Professional Fees at 10% of Cost	£	24,050	Professional Fees at 12% of Cost	£	28,860
Developers Profits at 18% of GDV	£	105,300	Developers Profits at 12% of GDV	£	38,610
Interest Charges at 4% of GDV	£	23,400	Interest Charges at 4% of GDV	£	12,870
Sales and marketing Fees @2% of GDV	£	11,700	Sales and marketing Fees @2% of GDV	£	6,435
Purchaser costs @ 6% of GDV	£	35,100	Purchaser costs @ 6% of GDV	£	19,305
Residual Land Value/ Sellers Aspiration	£	144,950	Residual Land Value/ Sellers Aspiration	-£	24,830
Value Per Plot	£	144,950	Value Per Plot	-£	24,830
Plot Value as % of GDV		24.78%	Plot Value as % of GDV		-7.72%

7.8 Table 7 below sets out the plot value required to deliver both private and affordable tenures based upon the range of different sizes of properties.

Table 5. JLL residual appraisals for each tenure

Typology	Tenure	Plot Value
One Bed Apartment	Private	£60,995
Two Bed Apartment	Private	£61,060
Three Bed Apartment	Private	£53,650
Two Bed House	Private	£106,675
Three Bed House	Private	£130,350
Four Bed House	Private	£144,950
Typology	**Tenure**	**Plot Value**
One Bed Apartment	Affordable	(£25,545)
Two Bed Apartment	Affordable	(£37,687)
Three Bed Apartment	Affordable	(£64,565)
Two Bed House	Affordable	(£9,129)
Three Bed House	Affordable	(£16,412)
Four Bed House	Affordable	(£24,830)

Source: JLL (2018)

7.9 The table shows that for private typologies the plot value ranges from £53,650 to £144,950 whereas for affordable housing typologies the plot value ranges from a cost to the development per affordable home of (£9,129) to (£64,565).

7.10 JLL's analysis of plots available in the market place on small sites (where for instance planning permission exists to develop garden land) shows that asking prices for plot values are significantly more than these plot values often up to £200,000 per plot or 40% of the sale value. These values are considerably more than those at which land needs to be transacted for it to be viable for a developer to secure a reasonable rate of return to invest in developing for the average property sale. In addition these are plots where no affordable housing contribution is being made.

7.11 Where there are proposals to redevelop the whole plot including demolishing an existing dwelling, the following general analysis explains the difficulties. In Enfield a larger detached home or bungalow may have a value of between £500,000 and £800,000 (the Existing Use Value or EUV).. In such an instance the site would have to be of a size which could accommodate 9 private dwellings at a plot value of £55,55 to £88,888 for the landowner to receive the existing use value of the asset, where this is being replaced as part of the development.

7.12 This is unrealistic with most small redevelopment sites being of a size that can accommodate one or two net dwellings per plot. Therefore, if you take a £500,000 to £800,000 home and demolish this. replacing it with two dwellings. the plot value is going to be £250,000- £400,000 per plot. Even if replaced with four homes, the plot value will be £125,000 to 200,000.

7.13 Therefore in Enfield there is a disconnect between EUV and the plot values required through which housing can be delivered by on small sites. A significant amount of the market is occupied by self-build developers, where profits may be discounted to achieve a viable delivery approach, in exchange for bespoke properties built for long term occupation

7.14 It is also apparent that delivering schemes with affordable housing is significantly less viable than those sites that do not require affordable housing.

7.15 For example, a typical small site development of a 9 apartment scheme of private dwellings (3 x 1 bed, 5 x 2 bed and 1x 3 bed) generates a residual land value of £541,935 (see Table 8 below)

Table 6. Residual Plot Value – 0% Affordable

Typology	Tenure	Mix	Plot Value	Total Plot Value
One Bed Apartment	Private	Three	£60,995	£182,985
Two Bed Apartment	Private	Five	£61,060	£305,300
Three Bed Apartment	Private	One	£53,650	£53,650
		Nine	**TOTAL**	**£541,935**

Source: JLL (2018)

7.16 On the other hand if a larger scheme was pursued on the same site, through increasing density to say 16 dwellings (all apartments), because the affordable housing threshold is exceeded there would be a requirement to deliver 35% as affordable housing. In this example we have assumed the following mix:- 3 x 1 bed, 5 x 2 bed and 1x 3 bed all private and 2 x 1 bed, 3 x 2 bed and 1x 3 bed affordable. The residual value arising from the density change would in fact fall to £313,219 (see Table 9 below).

Table 7. Residual Plot Value – 35% Affordable

Typology	Tenure	Mix	Plot Value	Total Plot Value
One Bed Apartment	Private	Three	£60,995	£182,985
Two Bed Apartment	Private	Five	£61,060	£305,300
Three Bed Apartment	Private	One	£53,650	£53,650
One Bed Apartment	Affordable	Two	(£25,545)	(£51,090)
Two Bed Apartment	Affordable	Three	(£37,687)	(£113,061)
Three Bed Apartment	Affordable	One	(£64,565)	(£64,565)
		Sixteen	**TOTAL**	**£313,219**

7.17 This demonstrates that affordable housing policy is likely to act as a disincentive to higher levels of intensification. Landowners will not want to forgo the higher residual values generated by schemes which are below the affordable housing threshold. It may be that the average plot value of £60,215 is still below a landowner's aspirations but nevertheless is significantly higher than the £19,576 generated in the 16 dwelling scheme.

7.18 JLL have further considered whether indeed, at least in Enfield, that there are financial incentives to develop at lower densities. Table 10 below sets out the residual plot values for a four dwelling private scheme with 1x 2 bed, 1 x 3 bed and 2 x 4 bed houses. As can be seen the scheme generates an aggregate plot value of £526,925 (see Table 10 overleaf).

Table 8. Residual Plot Value – Houses compared to Apartments

Typology	Tenure	Mix	Plot Value	Total Plot Value
Two Bed House	Private	One	£106,675	£106,675
Three Bed House	Private	One	£130,350	£130,350
Four Bed House	Private	Two	£144,950	£289,900
		Nine	**TOTAL**	**£526,925**

Source: JLL (2018)

7.19 The residual value identified in Table 10 suggests that a decision whether to build a 9 private apartments scheme or a 4 private house scheme is marginal. However it is JLL's assessment that the market will find it more attractive to develop the lower density scheme because of the better market for family homes, the lower planning risk and the reduced construction risk. If the site can deliver 5 dwellings the decision to pursue this ahead of an apartment based scheme becomes less marginal.

7.20 JLL has undertaken further assessments to identify the threshold at which it becomes more beneficial to deliver affordable housing. JLL modelling has identified that this happens when the number of dwellings exceeds 25 and therefore the small sites policy no longer applies.

7.21 The GLA has commissioned its own viability studies. The London Plan Viability Study, (which essentially seeks to underpin the affordable housing policies in London Plan 2017) adopts the principle that where the residual value of a scheme exceeds a benchmark land values (BLV) then the scheme is viable. Across London schemes have been reviewed and banded within the study. LB Enfield falls into the lowest BLV category of Band E with BLV's of between £10k and £30k per plot.

7.22 The study then looks at a whole range of different types of development options, of which only two (Res 1 and Res 2) fall into a small site category. Furthermore the study finds that in Band E only one small site option is viable, that is an 8 dwellings 3 storey scheme. It suggests that this is viable either with or without an off-site affordable housing contribution of £30k per dwelling. As Enfield does not secure such contributions it would suggest that a further £30k per unit can be added to the residual value taking it significantly above the BLV. .

7.23 However the London Plan Viability Study does not start to approach the issue of the redevelopment of small sites within existing block development taking into account existing use values of dwellings. Whilst the study acknowledges that the demolition costs need to be built into the construction costs because it is assumed all developments tested would need to be constructed on previously developed land and therefore there would be pre-existing buildings to be demolished, the market value of those buildings appears to have been ignored.

Viability testing conclusions

7.24 It has been shown that existing use values in Enfield are above the general levels that would facilitate redevelopment of individual houses. Furthermore the asking prices for individual building plots are at levels which only attract those looking to self-build.

7.25 In addition:-

- Affordable housing requirements are a major financial disincentive to the delivery of high density schemes of between 10 to 25 apartments.
- Even where, because of the absence of an affordable housing requirement, it is viable to deliver a 9 apartment scheme, it is more likely that the market will opt for a less risky approach based on a 4 house scheme rather than opting for the higher risk of building a greater number of apartments.
- As Enfield is one of the most affordable Boroughs in London it has grown in desirability to purchasers seeking good value housing options. However whilst this creates demand, construction costs do not wholly concern themselves directly with outturn value and therefore constructions costs as a proportion to outturn sales value remain higher than in Boroughs where the value of housing is higher. Accordingly in areas such as Enfield where value to cost ratios are low development becomes marginal.
- The London Plan Viability Study does not address the issue of small site development in any meaningful way.

7.26 There will always remain a base level of small site development in the Borough and these will make a useful contribution to the overall meeting of housing need. However in spite of the strong policy push in London Plan 2017 the Small Sites Target does not appear to have been prepared on the

basis of market conditions and JLL's assessments provide a strong indication that the target should be downsized to reflect the identified market conditions to a level significantly less than 9,780 dwellings over the next 10 years.

8. Other Potential Obstacles for Future Small Site Development

8.1 Beyond issues of viability there are a significant number of additional obstacles to housing delivery and construction in London generally. However the focus of this section is on those which in particular are likely to challenge the delivery of the Small Sites targets particularly in Enfield.

8.2 The matters addressed are as follows :-

- Land owner and developer interests
- Construction capacity
- LPA resources,

Landowner and Developer Issues

8.3 It is expected that landowners of existing houses (or indeed other buildings) will be incentivised to bring forward their land for development either when they can see a profit over the EUV. They may achieve this profit through sale of the development opportunity, self-build for part occupation (where part of the completed development is then rented or sold off) or investment (where the landowner undertake the development but does not want to occupy part of the completed scheme) .

8.4 We have already in the previous section identified the disconnect between the aspirations of land owners with small sites and the plot values that are necessary to enable delivery.

8.5 Given that demolition and rebuild looks particularly unviable with the small plot sizes in Enfield the pressure to intensify may turns towards a greater expectation of garden grabbing. However, in valuation terms, such developments can significantly impact on the amenity of the retained dwellings in some cases significantly reducing the value of the retained property by a sum that eliminates the incentive to generate an intensified plot opportunity.

8.6 More importantly where sites require affordable housing (10 homes and over), plot values are reduced considerably, to the point that it remains more viable to deliver smaller developments than those that require affordable housing.

8.7 In conclusion the profit incentives to owners for small site intensification in Enfield look very uncertain.

8.8 Indeed the block study undertaken by Farrells suggests that owner occupiers are more concerned with improving their homes by increasing the amount of accommodation rather than become developers in their own right. The considerable disruption which may be experienced is often accepted by an owner occupier when the direct space benefits are subsequently enjoyed. There is no particular evidence that significant numbers of owner occupiers are going to turn into developers of their own homes to increase the size of their properties to create further accommodation for others.

8.9 Therefore owner occupiers are hardly likely to be a significant new class of entrants into the world of development.

8.10 The largescale PLC developers, who deliver most of the housing output, have little to no interest in small sites of average sales value; such developments are a distraction to their business model and do not contribute to the overall strategy of their business, which is outlets, volume and profits. This not a criticism of that model because they do play a vital role in housing delivery.

8.11 The Registered Providers have themselves become PLC housebuilders focusing on undertaking largescale development where the market risk activity can be justified by delivering a larger proportion of affordable housing, something that is not possible for small sites.

8.12 The absence of interest by the main players in Small Sites is exacerbated because the market is suffering from a general lack of new developer entrants to aid housing delivery. The Government and the Mayor are both concerned about this and have initiatives to try and help increase the number of small developers.

8.13 Some local authorities and local authority housing companies are willing to tackle small site delivery with Croydon's Brick by Brick and Newham's Red Door being good examples. However LB Enfield does not have a Local Housing Authority Company and, like a number of authorities, is focusing resources on larger developments and estate renewal programmes (such as Meridian) that have more potential for housing target delivery and socioeconomic benefits.

8.14 Even in spite of these initiatives the developers of Small Sites, particularly in LB Enfield, are predominantly a range of small and local builders, (often family controlled), private individuals and small investor collectives.

8.15 These developers face many inherent challenges, ranging from expertise, funding, risk profile and appetite for the investment. Development is a time consuming, a regulated process where participants need to be certain that the risk is worth the reward. Even where rewards are notionally evaluated as worth the risk and investment, the practicalities of undertaking development can be burdensome.

8.16 In the short term the current context for housing delivery in London is looking challenging. Whilst demand continues to outstrip supply and interest rates remain at an all-time low, confidence in the market place is deflated due to Brexit and the sentiment that the housing market has had a continued and unsustainable period of inflation. Sellers are having to make price reductions to attract buyers with the market now in favour of the buyer if they are willing to commit to a purchase.

8.17 This makes the need for support even more important. The Government's main initiatives to help new housing development have been the Help to Buy scheme and funding for intermediate forms of tenure to address viability. Whilst this has sustained the PLC new build volume market, the process for smaller sites developers may be found to be challenging and in many cases not applicable.

8.18 The rules around Help to Buy that could create a challenge for small sites are as follows;

- The Help to Buy funding administration agreement states that an eligible purchaser is a person who is not connected with the provider, therefore you cannot sell to friends and family.
- New build properties are newly completed dwellings including converted commercial premises and any conversions which have not been used as residential dwellings immediately before conversion. Houses split into flats are therefore not included in the definition.
- Homes which have been previously occupied either by an owner occupier or a tenant before sale may not be purchased with Help to Buy assistance.

8.19 Because Help to Buy is not generally available for small sites this will hamper delivery of smaller units aimed at the first time market, as the small site developer is not able to compete with the larger plcs.

8.20 Other difficulties arise in the competition between small site developments and larger market deliverers, the latter obtaining tax breaks and being able offer sales incentives leading to an imbalance in risk to developers in the small sites market.

8.21 If the Small Sites policy is going to optimise delivery there will have to considerably more confidence in the outcomes of planning processes to secure consent for small site development at least reducing the up-front risks.

Construction capacity

8.22 For those developers who have an interest in small sites, the actual process of building is constrained by a lack of construction skills and access to materials. The demand from the large-scale house builders and the ongoing large-scale projects around the capital (including infrastructure projects) means there is simply not enough labour in the market place to address projects of a short term and sporadic nature. Such work provides little job security for construction workers and competes against employment opportunities where work may be undertaken without risk of salary payments.

8.23 Where labour is available it is either lacking in skills, or is not available at cost effective rates, or indeed both. These traits are a considerable risk to the developer because of their impact in relation to cost, delivery periods, certainty of completion and completion to the required quality, needed to achieve sales at the price required to maintain the value required to cover costs and profits.

8.24 Whilst there is a general challenge in the London market place to deliver housing arising out of these constructions issues on small sites there is little opportunity on viable basis to adopt methods outside of traditional development such as modular to counteract reliance on skilled trades and the use of traditional materials.

8.25 Finally in terms of construction costs it is worth noting that in addition to the general challenges set out above the conversion of buildings, extension and intensification that are not deemed new build will not benefit form a zero-rated VAT status. This will add a further 20% to construction and supply chain costs. Where non- recoverable VAT is added this will further compound the attractiveness of delivering additional dwellings.

Planning resources

8.26 Once of the main initiatives proposed in London Plan to increase the certainty of obtaining planning permission for a small site development is the production of Design Codes by the Borough Councils. This and the resource implications are discussed in the next section of this report.

8.27 However the initiative this fails to take account of the current significant focus on neighbourhood plans and community led development. Small sites, “garden grabbing” or re-development of “community assets” and development in generally tight locations that could create intensification and perceived detriment are not be well received by residents.

8.28 The small sites definition points toward development that is generally in tight and difficult locations, surrounded by existing residential and where the development can provide little community benefit except perhaps by making offsite Affordable housing contributions.

8.29 In Enfield managing planning applications that will deliver nearly 1000 dwellings per annum over the plan period will require a significant amount of planning resource (over and above that required to produce design codes).. As the small sites policy will not be delivered through permitted development rights every application will require consideration of full detailed design planning applications. Each application will need to be assigned to a sufficiently experienced case officer. Finding such officers, just like finding skilled constructions workers, is challenging, particularly when both applicants and opponents of schemes create significant pressures. Each application may involve pre-applications, application validation, notice posting, statutory consultation, policy benchmarking, amendments, engagement of consultants, policy review, writing and presentation of officer reports, challenge reviews and many other time-consuming inputs, including dealing with residents and objections.

8.30 If most of the housing numbers are to come by sites of 9 dwellings or less it will require 108 or more applications per annum all which have to be turned around in an 8-week period from validation. Added to this will be time spent on pre- applications. This could be intensified on small sites of a sensitive nature where objections are lodged.

8.31 It is highly likely that the cost and burden of small sites will create delays within the LPA, especially if staff cannot be recruited and the cost of the process may outweigh the fees received. This will all create challenges to the delivery outturn, more importantly confidence in the process which could be off putting to progression of small sites delivery, or lead to significant delay in their ability to be determined. It may be conceivable that the small sites policy may remove LPA resource form efficiently progressing larger site applications that can genuinely contribute to Housing targets.

8.32 The small sites policy expects with revised proactive planning designation and designs for small sites by the LPA that it will bring forward landowners and developers to release small sites for development.

8.33 The policy provides no means to address to conflicting interests and legal challenges in land ownerships to aid delivery. Government policy has been changing and now seeks to encourage Local Authorities to intervene to resolve challenges of multiple land ownership or land-banking to aid delivery through the use of compulsory purchase. . This is evident by CPO reform.

8.34 However there is no indication that such powers are intended to be used to aid the delivery of small sites and indeed it is difficult to perceive a compelling public interest in intervention on such small scale issues amidst hostility to development from neighbours. It is unlikely that the London

Boroughs will intervene particularly because of the proportionately high cost and financial risks of using CPO in such instances.

8.35 Permitting development on many small sites will challenging for local authorities because of their characteristics, particularly because of local hostility to perceived back land development, the increased demands on public services through intensification of built up areas, congestion, and the general loss of amenity during lengthy construction phases particularly when development is undertaken by smaller less experienced operators. These elements give rise to considerable emotional involvement from neighbours who vociferously challenge planning and development proposals. If the Boroughs chose to intervene in site assembly of small sites those challenges will not only exist during planning phases but also where compulsory purchase powers are sought.

Conclusions

8.36 It can be seen that there are a number of additional challenges to small site development other than the viability issues highlighted in the last section. These include

- Home owner's desire to improve their own properties for their own use
- The lack of experienced small site developers
- The construction capacity generally in London
- The resources available to the Local Planning Authorities to manage this process.
- The absence of interventions to assemble small sites.

8.37 In the next section we consider whether the use of Design Codes might be the tool that the London Boroughs can themselves use to overcome some of these barriers by creating confidence about the opportunities for redevelopment.

9. Use of Design Codes

9.1 Chapter 3 considered the importance of 'design codes' as the key tool in the application of the Presumption in Favour in policy H2 E. They are also referred to in relation to draft policy D2 Delivering Good Design and policy D3 Inclusive Design. Paragraph 4.26 of the draft London Plan includes significant suggested changes to emphasise their importance – including their role in offering greater clarity and certainty for potential applicants.

9.2 Policy H2 (B) states that boroughs should:

2) Prepare area-wide design codes for small housing developments between 1 and 25 homes to:

a) proactively encourage increased housing provision, good design and higher residential densities

b) cover the spatial locations set out in part D2 (excluding the exempted areas listed in part F)

c) provide clear guidelines and parameters for the range of small-scale housing developments listed in part D2, as a minimum, to provide certainty and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.

[The range of housing developments in Part D2 are as follows:

a) residential conversions (subdivision of houses into flats)

b) residential extensions (upward, rear and side)

c) the demolition and/or redevelopment of existing houses and/or ancillary buildings

d) infill development within the curtilage of a house

e) the redevelopment or upward extension of flats, non-residential buildings and residential garages to provide additional housing.]

2A) prepare site-specific briefs, masterplans and design codes for other types of small sites (under 0.25 hectares in size), where appropriate

9.1 Enfield is already producing a significant amount of design guidance within its Area Action Plans[10].. Therefore the challenge has been to see if meaningful design guidance can be produced below the AAP level.

9.2 It is also aware of the production by Croydon of its draft Suburban Design Guide. This is a generic document applying to all relevant parts of Croydon to support its own initiatives in bringing forward more windfall sites within the areas where urban intensification was expected. It is more illustrative but less area focused than the design content in Enfield's Area Action Plans.

9.3 In order to explore the position further Enfield commissioned urban designers, Farrells, to examine whether it was possible to drill down below the AAP level to provide design codes on a less generic, more area focused basis than either of the two above approaches. Their conclusions are that the individual characteristics of potential sites are sufficiently different that the only realistic basis through which detailed guidance can be provided is through something more akin to a development brief for individual sites. Two sites were selected[11] and meaningful design guidance was then produced.

9.4 The draft guidance produced is set out in Appendix B. It is considered to be of sufficient quality that that should help build confidence in planning outcomes.

9.5 What has been produced is considered to be the minimum required to deliver the stated policy objectives. The work is much more focused than both the AAP work and Croydon draft Suburban Design Guide on the particular character of properties around Palmers Green and Turkey Street focussing in on actual real sites to provide essential analysis about capacity,

10 For example in the North Circular Area Action Plan it identified three neighbourhood places and has provided detailed design guidance in relation to each of these areas.
11 Which were both in AAP areas but not allocated because they were small sites.

the key issue in many developments which have already been identified through the Enfield Small Sites Register.

9.6 What the Design Code is unable to do is to drill down further to identify and then provide robust guidance for those much smaller opportunities as were identified in the block analysis.

9.7 Equally important, Farrells have logged the time input into producing the Design Code and have come to some conclusions about the scale of the task that might be faced if this is seen as the main instrument of delivering more planning certainty.

9.8 Farrells believe that there might be as many as 100 small sites within the agreed intensification boundary for each rail and tube station in Enfield and therefore a comprehensive approach would require analysis to be undertaken for around 2000 small sites. They estimate that it could take 20 years for a design team to undertake the necessary work.

9.9 Nevertheless even if this was seen to be a worthwhile activity Farrells consider that the land ownership issues are likely to be an equal barrier to development as discussed in the last section.

9.10 Even so the conclusion has been reached that an effective design code for a small area would be an amalgam of such individual development briefs and require the same resource multiplied a number of times. If that cost is not to be borne by the Boroughs there is little prospect of it being produced privately. Individuals are not likely to want to produce development briefs for their own sites but will simply engage in early discussions with the development management teams.

9.11 If alternatively each Borough is simply to produce a replica of the Croydon Suburban Design Guide then there may as well be a single GLA document. If there is to be more encouraging bespoke guidance it is difficult to envisage this being anything more meaningful until it gets down to the site specific level, in which case the Boroughs will not be resourced to be able to deliver sufficient design codes to make a difference. Finally there is no evidence that the production of a design code or development brief actually overcomes any of the other barriers identified elsewhere in this Statement and therefore their benefit as a tool to encourage delivery is unproven.

10. Small Sites Policy – Conclusion

Can Enfield deliver the London Plan 2017 Small Sites Target?.

10.1 There are a number of reasons why Enfield will be unable to deliver the London Plan Small Sites Target. These have been discussed in the previous sections and are summarised here.

The Scale of Small Site Development Required.

10.2 The 2011 London Plan, and subsequent alterations in 2016, significantly increased Enfield's housing targets from 560 to 798 dwellings per annum. The Plan now proposes to more than double the borough's housing target to 1,876 dwellings per annum, of which 983 (52%) is expected to come from small sites.

10.3 Enfield delivered approximately 9,417 net additional dwellings in the 14 years between 2004/05 and 2017/18[12] at an average rate of 672 per annum. This included approximately 3,504[13] [14] dwellings from small site developments, an average of 250 dwellings per annum which represents 37% of total net additional dwellings. Compared with these past trends, the Plan targets will require a 180% increase in delivery of additional dwellings from all sources and a 293%[15] increase in the delivery from small site sources. This would represent not so much a step change as a giant leap in small site delivery.

Table 9. Enfield Past Trends Small Sites

	2004/05 - 2015/16	2016/17 - 2017/18	2004/05 – 2017/18 14 year period	
			14 Year Total	14 Year Average
Small Sites	3,030[16]	474[17]	3,504	250
All Sites	8,133[18]	1,284[13]	9,417	672

10.4 Enfield has recently undertaken its assessment of the supply of housing land within the Borough in the production of its Housing Trajectory 2018[19]. Over the five year period 2018/19 to 2022/23 known sites could deliver approximately 4,808 new homes which equates to an annual average of 962 per year. Up until 2032/33 the Trajectory shows 15,650 additional new homes could be delivered or an annual average of 1,043. However this is significantly fewer than the 1,876 dwellings per annum in the Plan. Reaching 1,876 homes per annum will require a 79% increase on housing trajectory predictions.

10.5 Given the historic rates of small site development[20], the contribution of small sites to this is at best expected to be just over 300 dwellings per annum. Clearly this would not be sufficient for small sites to close the gap between the Housing Trajectory and the Plan target.

The Robustness of the 2017 SHLAA – Analysis and Modelling Assumptions

10.6 Chapter 6 of the 2017 SHLAA contains very limited and questionable analysis of either the reasons for past trends in delivery from small sites (paragraphs 6.8, 6.9), or the potential effects of the new Plan policies.

12 Live tables on housing supply: net additional dwellings. Table 122.
13 2017 SHLAA Table 6.4
14 London Borough of Enfield annual housing completions reports to the GLA London Development Database DD 2004/05 - 201718 : change of use office-residential permitted development removed
15 983 as a percentage of 250

16 Live tables on housing supply: net additional dwellings. Table 122.
17 2017 SHLAA Table 6.4
18 Enfield's Researched Evidence on Small Sites supporting Matter 20 will be submitted to the Panel in January 2019 following completion of Member sign-off processes.
19 https://new.enfield.gov.uk/services/planning/exd72-draft-housing-trajectory-2018-planning.pdf this trajectory is appended to the Enfield submission made on Matter 11.
20 The maximum small sites contribution achieved by Enfield was 425 homes in 2007/8, representing pre-recession peak delivery.

10.7 There are also important concerns about the modelling approach used in the SHLAA, as set out below.

- **1% Growth Rate** - no evidence, analysis or reasoned justification is provided for the 1% "annual growth rate" assumption, which is purely based on a judgement. The outputs appear highly sensitive to changes in this assumption, raising a serious question mark over the robustness of the modelling and the projected "capacity" for small site development.
- **Selected Areas** – Enfield have tested the capacity of selected areas which meet the intensification criteria (PTALs 3-6 and within 800m of a town centre boundary or a tube or rail station). This testing queries whether a) the development market and construction capacity exists to deliver this level of intensification; and, b) the resource and financial implications of creating Design Codes which meet the requirements of Policy H2 (B2 and B2A) which are estimated to take one team 20 years to complete for the borough as a whole.
- **Growth Factors** - There are uncertainties surrounding the use of both of the growth factors as proxies for housing yields from terraced and semi/detached houses – these uncertainties are not explored in the SHLAA.

10.8 The London Borough of Enfield currently comprises 75,459 homes of which 52,401 are situated in the selected areas which meet the intensification criteria of Policy H2. To achieve the additional 8,900 homes over 10 years suggested by the modelled intensification, would mean, on average, the formation of an additional household for every existing 5 or 6 houses in those neighbourhoods over the target period. This degree of change to existing local communities needs to be recognised from the outset, and only pursued if areas genuinely have capacity to accommodate it in ways that can deliver Good Growth. It underlines the need for robust evidence.

10.9 These SHLAA capacity estimates for small sites have been fed directly into the targets in the Plan at Table 4.2. This makes the deficiencies in the 2017 SHLAA particularly important, as it does not constitute the realistic, compelling evidence of a consistent and reliable source of windfall development which the NPPF 2012 requires at paragraph 48.

The current supportive development plan policies for small site development

10.10 The key local development plan policies used in the determination of planning applications for small site development are the following, contained in the Enfield Development Management Document (DMD):

- DMD5 – Residential Conversions;
- DMD6 – Residential Character;
- DMD7 – Development of Garden Land; and
- DMD8 – General Standards for New Residential Development.

10.11 These policies contain elements which seek to address matters of local character, housing mix and conversion quotas – all issues which the SHLAA implies have suppressed small site delivery, and on which the Plan seeks a change in approach. Together with other policies, they also seek to protect residential amenity, design quality and the standard of accommodation.

10.12 To review the effect of these policies, a sample of 56 appeal decisions relating to housing developments on small sites has been examined. The appeals sought permission for a total of 95 net additional dwellings, but only 10 (18%) were upheld, granting permission for 15 net additional dwellings, representing 16% of the additional dwellings applied for. This represents a success rate for the Borough which is above the national average, indicating robust decision-taking within the current policy framework.

10.13 Further analysis indicates that:

- the use of quotas/thresholds is (contrary to the suggestion in para 6.9 of the SHLAA) not a recent policy approach – and is probably not on its own a major factor in suppressing conversion rates in Enfield;
- a shift away from retaining/compensating for existing 3-bed family-sized units, particularly in conversion schemes , might yield a limited number of additional smaller dwellings;
- adverse effects on the character and appearance of the local area play a larger part in refusals of small site developments, offering some opportunity to increase supply through a change in policy; and

- however, many factors leading to refusals and dismissal of appeals relate to amenity, standards of accommodation and design quality – matters on which the Plan will have little impact.

10.14 Although just a snapshot, the appeal data does not seem to suggest that the Plan changes would lead to the level of increase in supply from small sites needed to meet the Table 4.2 targets.

The Viability of Small Site Development

10.15 Evidence from both JLL and the London Plan Viability Study indicates that the residual land values generated by small site development in Enfield are likely to fall far short of those expected by landowners. . It is evident that the value of existing the housing stock creates base plot values that removes possibilities of development through demolition and intensification. Housing markets and lack of incentives remove the attractiveness of conversion typologies and affordable housing measures reduce land values to incentivise developers to deliver less than 10 dwelling schemes, whilst land values suggest smaller housing schemes are more attractive in land value viability terms than apartment led schemes. All these viability challenges place pressure on delivering target numbers creating focus on smaller delivery.

Other Potential Obstacles for Future Small Site Development

10.16 There are a significant challenges to increasing the amount of small site development in Enfield

- **Land owner and developer issues** - Small sites often face multiple challenges because they are constrained. There is neighbour resistance to back land development, extension or intensification in built up areas. Land assembly is often required but it is not expected that the policy will be supported by extensive use of compulsory purchase powers, which would be likely to be unpopular if used. The developer market is occupied by smaller less experienced operators and is suffering from a lack of new developer entrants in the market place to aid housing delivery. These parties face many inherent challenges, ranging from lack of expertise, funding, risk profile and appetite for the investment. Whilst it may be the intent of the policy to stimulate the market with developers other than the PLC housebuilder the latter do play a vital role in housing delivery.
- **Construction capacity** - Small Site development will be constrained by a lack of construction skills and access to materials. There is simply not enough labour in the market place to address projects of a short term and sporadic nature, that provide little job security and where the security of steady income is likely to be more attractive than short term work at potentially higher contract value.
- **LPA resource**s – If the target were to be met it would require a significant increase in those working in development management in the Borough Council to manage both the volume of applications and the likely neighbour resistance to the whole policy of neighbourhood intensification.

The poor cost benefit ratio for Design Codes as the delivery tool for increasing supply

10.17 Policy H2 B2) requires Boroughs to prepare area-wide design codes to promote good design. Enfield has already been providing design guidance for smaller areas within its Area Action Plans and concludes that to be effective design guidance needs to be produced below this level. Accordingly the Borough Council has commissioned urban designers to produce what is considered to be meaningful guidance in the form of a design code for a smaller area.

10.18 The time and cost of preparing the details was recorded and it is evident that delivering encouraging design guidance on this level is simply not realistic. It is neither cost effective nor logistically feasible within the Plan period to deliver detailed design guidance for the number and variety of specific small sites which would be covered by policy H2.

Overall Conclusions

10.19 The overall conclusion of this report is that Enfield will not be able to deliver the London Plan 2017 Small Sites Target of 983 dwellings per annum during the plan period.

10.20 It is accepted that Small Sites Policy H2 is intended to provide a planning framework which both loosens what is perceived of a tight restrictive planning policy and will give more certainty for potential developers of Small Sites about the outcome of their planning applications in the development management system . However the reality is that this

description does not fit the positive policy framework found in Enfield. Further meaningful design guidance for Enfield will not be cost effective to produce.

10.21 Furthermore the theory that H2 should be a positive contribution to Small Site housing delivery as part of a wider supportive package for small sits does not address the practical challenges identified including problems of site assembly.

10.22 Indeed the key problem of the viability of small site development in Enfield will outweigh the policy push of the London Plan 2017. Therefore the tripling of the dwelling delivery target for small sites in Enfield will be frustrated because market pressures will be pushing in a different direction. On this basis the target is not achievable and its inclusion in London Plan is unrealistic and unhelpful.

10.23 Professional judgement is that Enfield may be able to increase the delivery of the number of dwellings from small sites by a small proportion above its current predicated delivery rate of 300 dwellings per annum.

Appendix A Palmers Green Study

Introduction - Evolution of the suburbs

In order to assess the likely intensification and uplift in housing numbers of a suburban block in the London Borough of Enfield, we have selected a typical urban block near Palmers Green Station. (Palmers Green has been identified separately as a typical situation for LB Enfield.)

We looked for an urban block that was:

1) **Typical of the area**
2) **Within 800m of a station**
3) **Contained a range of housing typologies**
4) **Not within a conservation area**
5) **Does not contain listed buildings**

One such suburban block (the block) is that bounded by Broomfield Avenue, Broomfield Lane, Hawthorn Lane and Belmont Avenue appears representative of the area. It is approximately 80m in width and 230m long. Other blocks range in size from 60m width to over 100m.

The block has a typical range of housing typologies including two storey terraces and large and small semi-detached villas. Many dwellings have already been extended beyond the original footprint or improved with the addition of conservatories, side extensions and loft conversions - typical of any suburban block in London. Mature trees along the rear garden boundary are a feature of the northern part of the block which is again typical.

This is not dissimilar to sub urban blocks in Croydon which have a broader range in widths from as little as 45m to over 100m with a similar range of typologies.

In our assessment we have looked at unit delivery in three scenarios for the selected block:

1) **Original complete block**
2) **The block today**
3) **The block tomorrow.**

1938 - The original "block"

The original block was constructed in the early stages of the 20th century, with the deep two story, semi detached villas on plots of 254m^2 that feature on the northern end of both Belmont Avenue and Broomfield Avenue. These are shown on Ordnance Survey maps from 1920. The later terraces, found on smaller plots averaging 215m2 to 240m2 were built between 1920 and 1938.

The block was "complete" on ordnance survey maps by 1938 and accommodated a total of 68 houses.

Number of dwellings **68**.

2019 - The "block" today

Since 1938, as you would expect, many original properties on the block have been enlarged by extending the property at ground level, into the roof, or with the addition of conservatories. Planning records show that number 58 Broomfield Avenue has recently been converted to 4 flats. Numbers 6, 10 and 22 on Belmont Avenue appear also to be have been converted at some stage but not within the last 18 years. The block has therefore yielded an uplift of 6 properties to date.

Number of dwellings **74**. (9% uplift)

The "block" tomorrow

Whilst it is possible to sub-divide two storey houses into two flats, the tendency and desire of residents is to improve the quality and floor area of a particular dwelling rather than sub-divide as might be expected in more urban areas.

Nevertheless we have anticipated that the block will continue to have some continued conversion of houses to flats particularly to the south where there remains scope for rear extensions .

The block interior has sufficient width to accommodate some mews type housing. However we have discounted this type of intensification here due to difficulties of access and assembly of land across multiple ownerships. The matter is exacerbated by the existence of the mature trees in the north.

In time however, it may be that small developers have sufficient impetus to acquire multiple ownerships and assemble plots of land that can be intensified.

In our study, we have speculated that the lower end properties along Hawthorn Avenue and the park side properties on Broomfield Lane may be acquired in groups of 6 or 8 depending upon natural party lines. Assuming it is financially viable, it is possible to speculate that these larger plots may be developed as small scale apartment "villas". In this instance the block could start to intensify and start to deliver more dwellings.

Overall our assessment indicates an uplift of 36 properties from the original 68 to 104 . Exactly when market conditions and economics are aligned to allow such intensification to occur is unpredictable.

Number of dwellings **104** (53% uplift)

Conclusion

In the last 80 to 100 years since this urban block has been constructed, despite the huge pressures for housing, relaxation of planning law and the introduction of permitted development, this suburban block has, to date, delivered an uplift of dwellings of just 6. (9%)

Design is not the limiting factor to intensification. Occupiers generally want to improve their dwellings by extending them to provide larger kitchen diners, additional bedrooms or games rooms, conservatories or utilities and/or toilet accommodation. The complexities of land acquisition and financial viability probably explain the lack of appetite in this instance to convert or extend properties for purposes of increasing unit numbers.

Over time, it is possible to consider that these considerable hurdles can be overcome and the conditions will exist where more intense typologies can start to yield an increase in housing numbers. However, there is no way of predicting when this may occur and it is unreasonable to rely on the natural run of things to deliver a significant uplift in housing unit numbers in any sensible time scale,

This study, for reasons of time and purpose of responding to the draft London Plan Examination in Public, has been confined to one "typical" case study areas in Enfield. However, the city fabric is not uniform and constantly evolving. There are a range of differing urban intensification opportunities and situations across the Borough that range from industrial, brownfield, green to greenbelt sites. In order to develop a clearer picture of the quantity of development that these areas can deliver, a borough wide study as part of Local Plan evidence preparation will be required that examines the availability and potential of such sites to deliver housing in the borough over the next two Local Plans periods.

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Palmers Green

Site location plan

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Site location plan

Selected suburban block in Palmers Green

Aerial image of the urban block

Ongoing flat conversion at 58 Broomfield Avenue.

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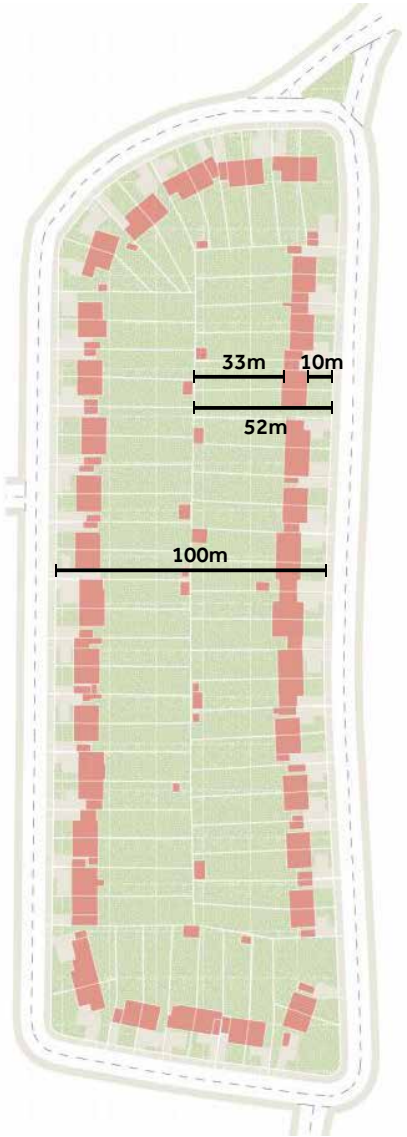
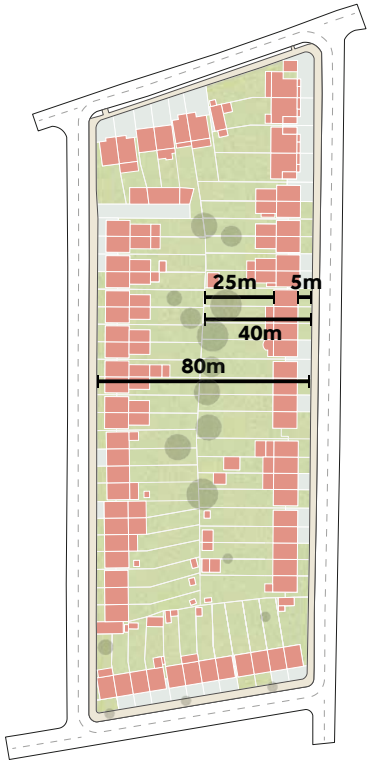
1. Comparing typical suburban blocks

A comparison of typical suburban blocks in Croydon and Palmers Green

Typical suburban block taken from the Croydon Suburban Design Guide





Typical suburban block in Palmers Green

0 100 m

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2. 1938 - The original block

Existing housing

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3. 2019 - The block today

Existing housing

Roof extension

Footprint extension

Property with a flat conversion

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4. The block tomorrow

Future Speculation

Existing housing

New homes

Property with a flat conversion

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1. Small sites Design Code

An introduction to the code

This document has been produced by the London Borough of Enfield (LBE) in support of the GLA's London Plan Policy H2 Small Sites. The policy is intended to promote residential development of small sites of up to 0.25ha in area and can accommodate up to 25 homes. Each H2 spatially selected site should have a PTAL (Public Transport Accessibility Level) rating of 3 or above, be within 800m of a rail or tube station and be within 800m of a town centre boundary (district centres and above) for "presumption in favour" status. Applicants will be granted planning permission for schemes that are either in compliance with the Small Sites Design Codes or, in the absence of a design code, can demonstrate there is no material harm to adjacent neighbours and uses.
Reference should also be made to GLA's Supplementary Planning Guidance and the London Housing Design Guide.
The Design Code is set out in four principal parts:

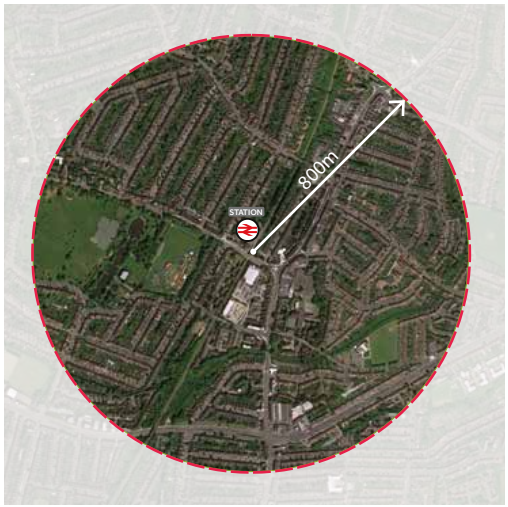
1. Area Design Code

This part of the document establishes the settlement pattern, urban form and character of a particular area. Good design starts with urban design and small sites will need to understand and recognise the contribution they can make to the wider area and local street character.

2. Small Sites Register

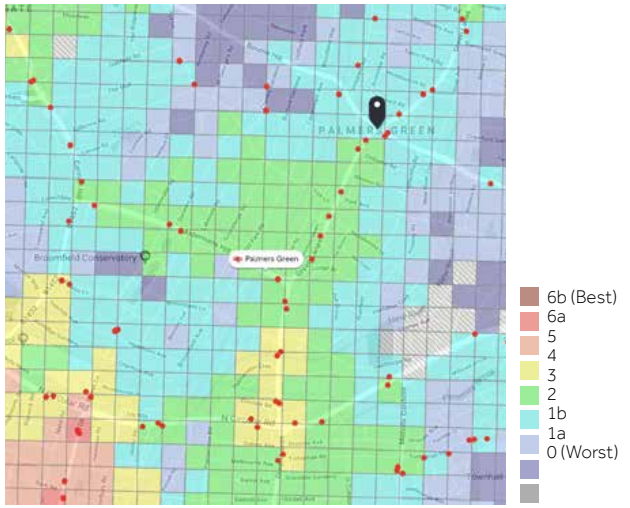
Enfield Borough Council has set up a register of small sites – 'the sites' within the area that are of 0.25ha and within 800m of a rail or rail served station. The sites are identified on the small sites plan and PTAL plan for the particular area.
The Borough has undertaken studies of the registered sites to test potential development of up to 25 dwellings against planning policy and establish a clear set of design codes for the particular site. Development proposals coming forward that can demonstrate compliance with the design code can assume that planning permission will be granted by the Committee.
The register is a live document and applicants can put forward sites for consideration for the register at LBEsmallsitesregister@enfield.com

Criteria for small site selection



1. 800m distance from station

3. AND within 800m of a town centre boundary



2. Public Transport Accessibility Levels of 3-6

3. The Codes

The design codes for the particular small sites identify a set of design rules that are in place to guide developers and their designers toward good quality design. They are a benchmark of quality and compliance with the codes will ensure the granting of planning permission. The design code should be regarded as a minimum and designs that exceed this quality will be encouraged.

4. Illustrative Proposals

Each small site on the register has under gone high level testing for its ability to deliver housing at an appropriate density for its size and location called illustrative proposals. These proposal are capacity studies only but are considered to have satisfied parts A,B and C of the code. Demonstration of this compliance is part of this section.
The applicant is at liberty to use these proposal at his own risk when putting together their Application but the Borough does not accept any liability whatsoever for their use.

Sample Design Code summary

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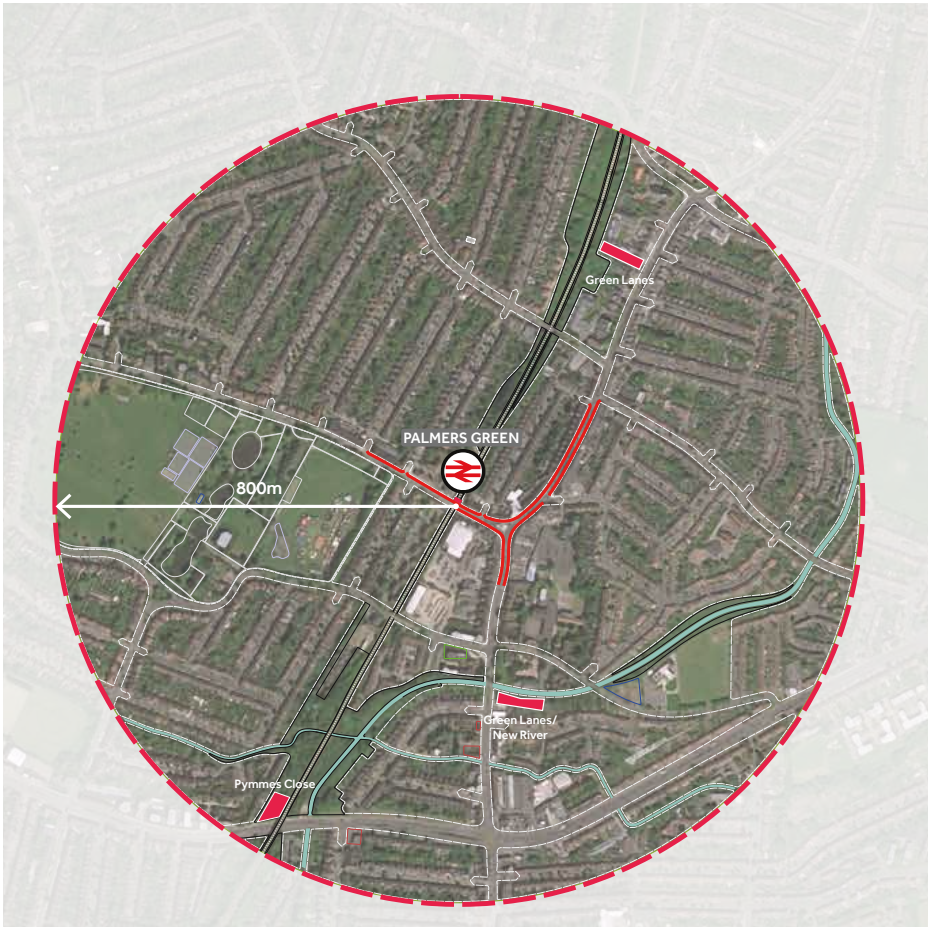
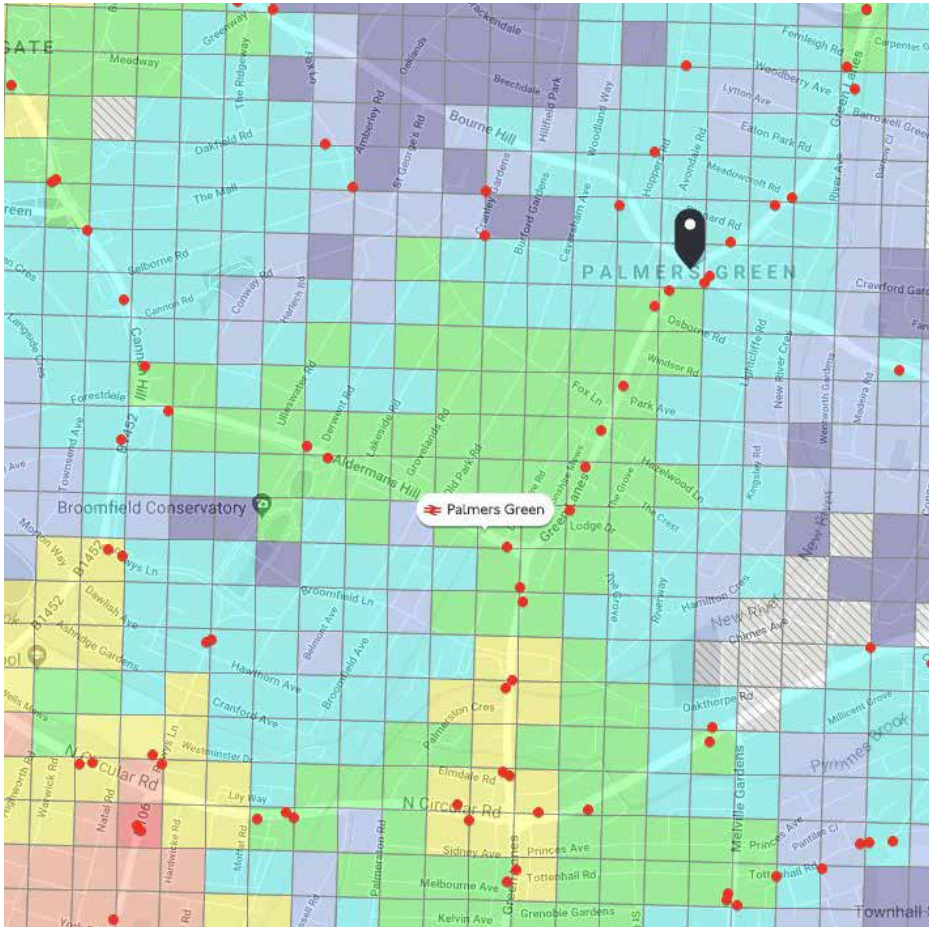
2. Small sites register

Palmers Green



800m distance from station

- Specimen small site



PTAL rating

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Small sites register - Palmers Green: 3 specimen sites

Address	Description	Site area	Distance from station	Location plan
Chosen specimen site for design code.				
1. Pymmes Close	Unoccupied site, bounded by the rail-way and the A406 North Circular (Bowes Road)	0.25 ha	700 m	
2. Green Lanes		0.24 ha	550 m	
3. Green Lanes / New River		0.18 ha	400 m	

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3. Area Design Code

Palmers Green

3.1 Historical Development

Palmers Green was a small village that originated at the junction of Green Lanes and Fox Lane. Recorded as a highway in 1324, there were only a few dwellings and the population was limited. In 1613 the New River was constructed to the east of Palmers Green to supply London with fresh drinking water taken from the River Lea and from Chadwell Springs and, originally, Amwell Springs as well as other springs and wells along its course.

By 1801, the village had grown to just fifty-four dwellings, including two inns - presumably to cater for travellers on the "highway"

In 1871 the railways arrived and the line from Wood Green to Enfield was opened. A station serving Palmers Green was constructed half a mile south of the village on Aldermans Hill.

Despite the arrival of the railway, the area remained largely undeveloped for thirty more years as local landowners refused to sell their large estates for development.

However, in 1902, two large Estates, Old Park and Hazelwood Park were sold for development and the area began to grow rapidly. Large amounts of grand Edwardian housing typologies were constructed to the west and east of Palmers Green village on the former park lands.

At the turn of the twentieth century, the local authority set about development of the civic and social infrastructure of the new Palmers Green town and established the underlying pattern of the town we see today.

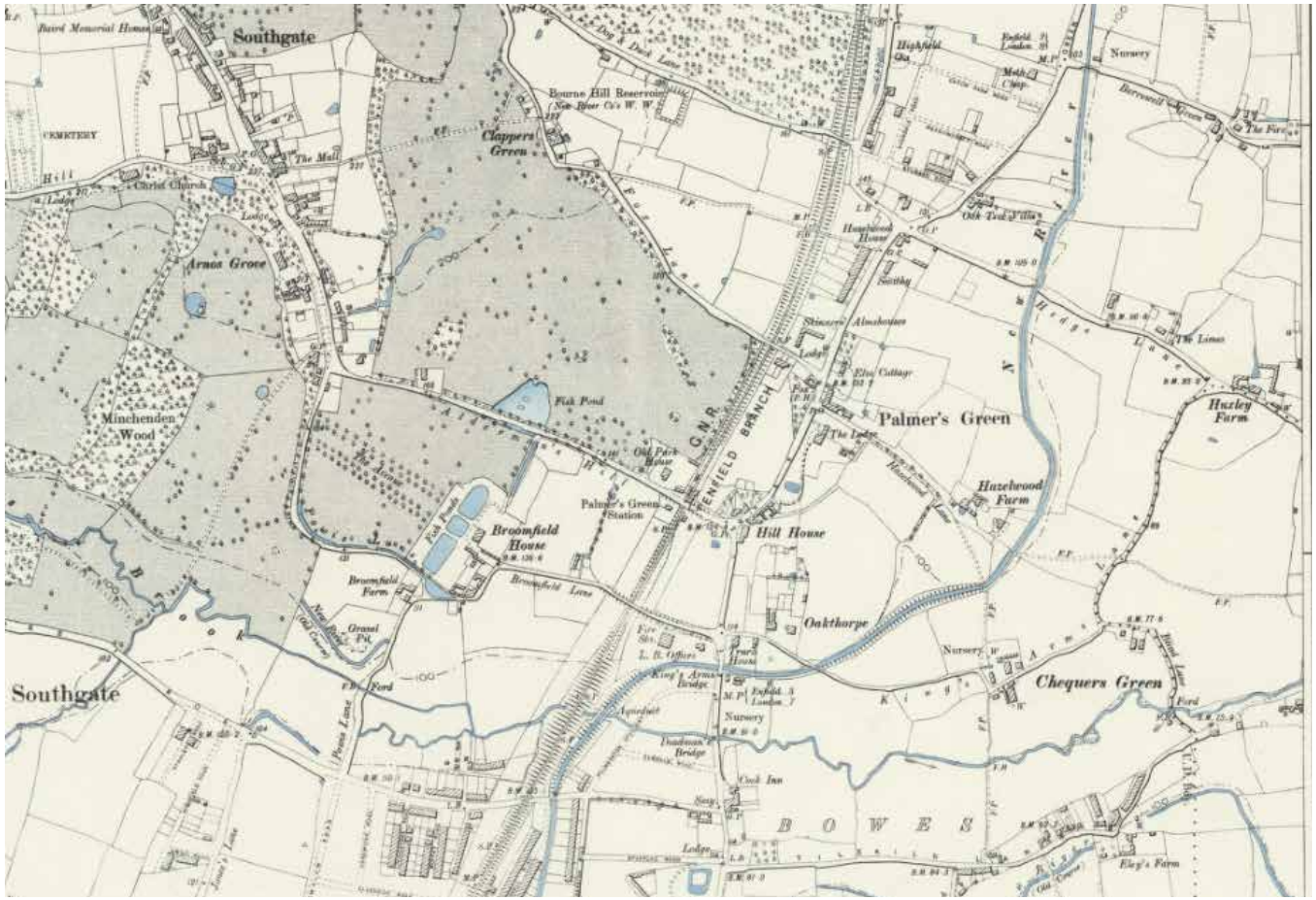
A town hall was constructed besides New River on Green Lanes road establishing a civic end to the high street, which had by now grown southward to meet the station.

In 1902 the council purchased the 16th Century Broomfield House and the 21ha Park immediately west of the station. The park was opened to the public whilst the house was put to use as the county school and maternity centre.

In the same year, the council constructed Greentrees Isolation hospital to the south east of the centre on Tottenhall Road. This was demolished in 1988 to make way for housing.

In 1908, schools were built in Hazelwood to serve the burgeoning population.

Palmers Green in 1897



Claudius Ptolemy and the Geography - Map Images - National Library of Scotland, maps.nls.uk/view/101455823.

3.2 Palmers Green Today

It is evident that the town centre sprang up at around the same period (1900's). The town centre is largely comprised of 2- 3 storeys of pre-war brick and stucco English renaissance style buildings - typical of the period. Most notable are the 1904 Edwardian Fox pub with its ornate stucco work and half- timbered corner turret. Also of interest, is the former town hall from a similar period.

The high street has a wide variety of mid-range shops and restaurants punctuated with the now ubiquitous betting shop. The high street, which is wide owing to the fact it used to have trams on it, is clearly a feeder route to the A406 north circular road and carries substantial amounts of traffic, dividing the high street into two sides. The street-scape of the town centre features very few soft landscapes or trees.

The great Edwardian estate developments of Old Park and Hazel-wood are very much in evidence - the former being the subject of a conservation area.

The A406 passes through the south of the area and has a more ec-lectic mix of new and older developments and a variety of uses.

Demographically, Palmers Green has a population of c.15,000 peo-ple, with an average age of 37. It is home to the largest population of Greek Cypriots outside of Cyprus and is often nicknamed "Little Cyprus" or "Palmers Greek".

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4. Building design code

Pymmes Close

4.1 Site Location

The Pymmes Close site is a 0.25ha site, 700m from Palmers Green Station and within 800m of the Palmers Green town centre boundary . The site is bound on the east by Pymmes Close and the railway line to the west. To the south, it faces onto the A406 North Circular (Bowes Road) adjacent the railway line.

4.2 Street Character

Pymmes Close is a short one sided street just 63m long, ending at parking cul-de-sac. The buildings along its eastern side are two storey domestic scale buildings with brick and stucco façades and pitched tiled roofs punctuated by chimney stacks. Each flat incorporates a recessed balcony. The fenestration would most likely have been metal framed before being replaced by the current uPVC. Each flat has ground floor access and an independent front door protected by a projecting concrete canopy. The stucco and brick banding creates a very horizontal architectural character which would have reinforced by the sequence of crittal window detailing.

The south façade faces onto the North Circular Road. With four lanes of heavy traffic, the North Circular presents a challenging environment to the site. The A406 in the Palmers Green Station area would have originally been two storey brick built Victorian terraces. Over time these have given way in parts to denser mid-rise developments. The nearby Broomfield Development is a two to five storey development that employs a variety of building masses, and materials that enhance the street character whilst addressing the challenges of the A406 environment. Ground floor windows and external areas are screened from the street with substantial fenestrated "garden walls". This is considered to be a successful approach in dealing with the urban environment.

4.3 Design Code

The building layout should enhance the existing street character and complete the street. The layout should not seek to be an independent "gated" building.

The layout must allow for continued access to the rear car park at the end of Pymmes Close.

4.4 Form

The building line along Pymmes Close should follow the street. It should not have a saw tooth arrangement or curve. Along the A406 the building line should address the street alignment.

Taller massing along the A406 is deemed appropriate and more suitable to the scale of that road. Away from the A406 and on Pymmes Close itself, the massing should steadily decrease to a maximum of 3 storeys.

4.5 Scale

Proportions, rhythms, expression

4.6 Detailing

The existing buildings along Pymmes Close whilst run down use soldier brick courses, string courses, banding, projecting door canopies, brickwork framing entrance doors and recessed balconies to create a rich street architecture of a distinctive character.

Proposals should incorporate a language of brick detailing and recessed balconies that reflect the existing typologies.

4.7 Materials

Sympathetic materials that reflect the general character of the area should be used. Fairfaced brick and stucco façades enhanced with enhanced by detailing of the entrances and window reveals would be considered appropriate materials.

4.8 Public Realm

The street is quite green in character with open grass front lawns and mature trees giving the street a leafy sub-urban feel which is to be cherished. Landscape should have substantial grassed areas that enhance the green character of the street. Parking spaces should be in groups of no more than three and broken up with planting and grass.

Sample Design Code summary

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G Public Realm	Street Furniture, boundary treatments, materials, lighting cycle storage and parking.

The design code is based on guidance provided by CABE and will cover the following design elements. Each particular site will have additional special conditions as required.

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Examples of suggested details appropriate for use at Pymmes Close.

Expressive Brickwork Detailing

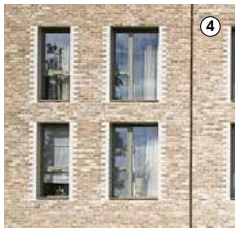
Brickwork incorporates groin details, ablaq, texture and reveals to enrich the facade.

Gorleston Street - Farrells

1

South Gardens - Macreanor Lavington

Horsted Village - Proctor Mathews



Evolution - Macreanor Lavington

Recessed Balconies

Bolt on balconies are to be avoided. The design should incorporate recessed balconies into the architecture.

The Horizon Building - Farrells

Aylesbury Estate - Conisbee

GMV - Jestico + Whiles

GMV - Jestico + Whiles

Doorways and Entrances

Doorways should be welcoming and be a focal point on the facade. Canopies, recesses and lights enhance the arrival experience.

GMV - Jestico + Whiles

Kilburn Quarter - Alison Brookes

Cornerstone Architects

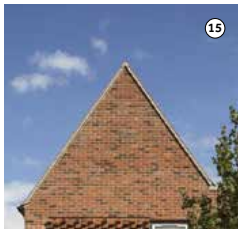
Cornerstone Architects

Roofscape expression

Long flat roofs to be avoided. Roofscape should be varied overlaying gables, pitches or stepped profiles.

Gorleston Street - Farrells

GMV - Jestico + Whiles



Horsted Village - Proctor Mathews

Granville Road - Levitt Bernstein

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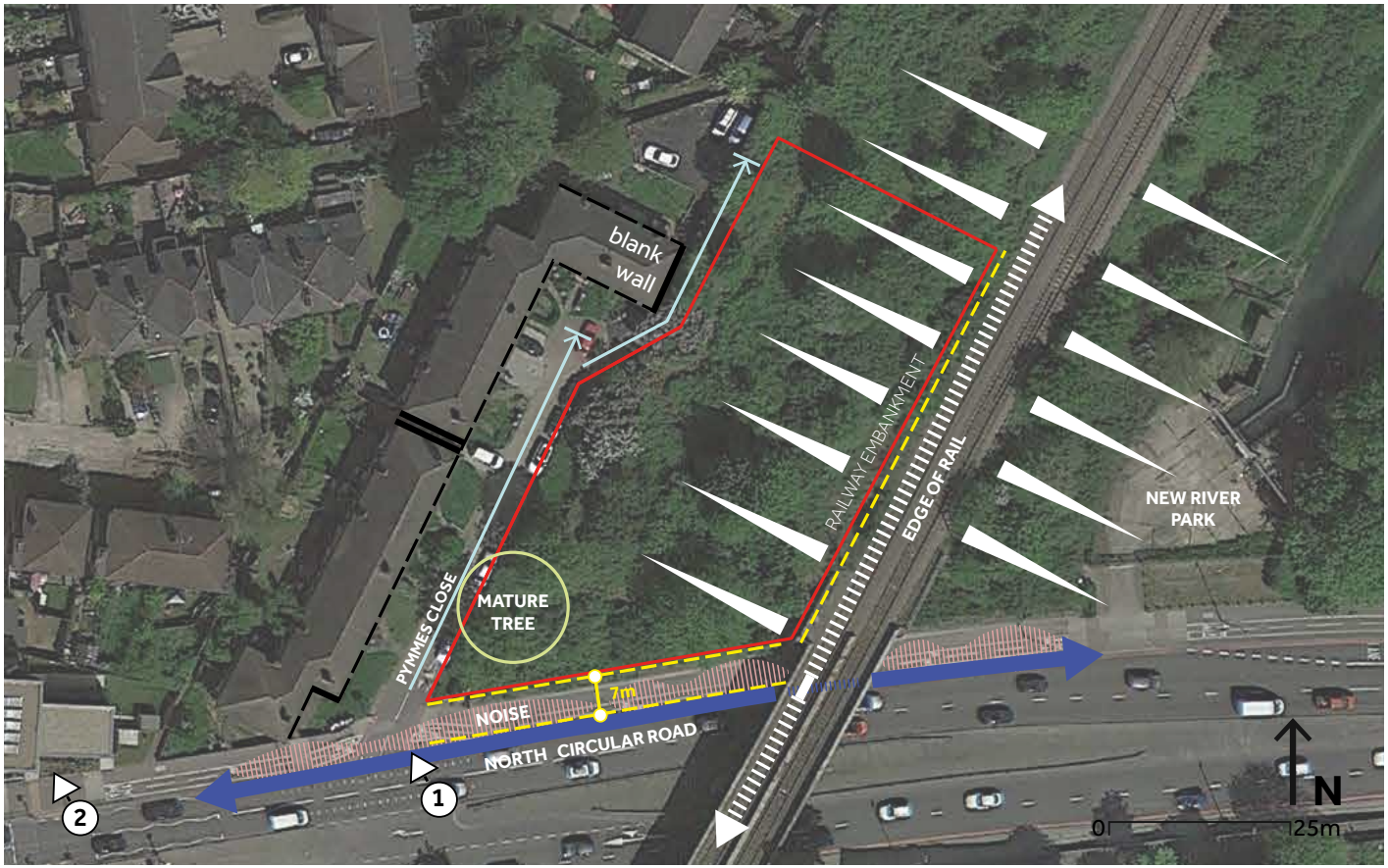
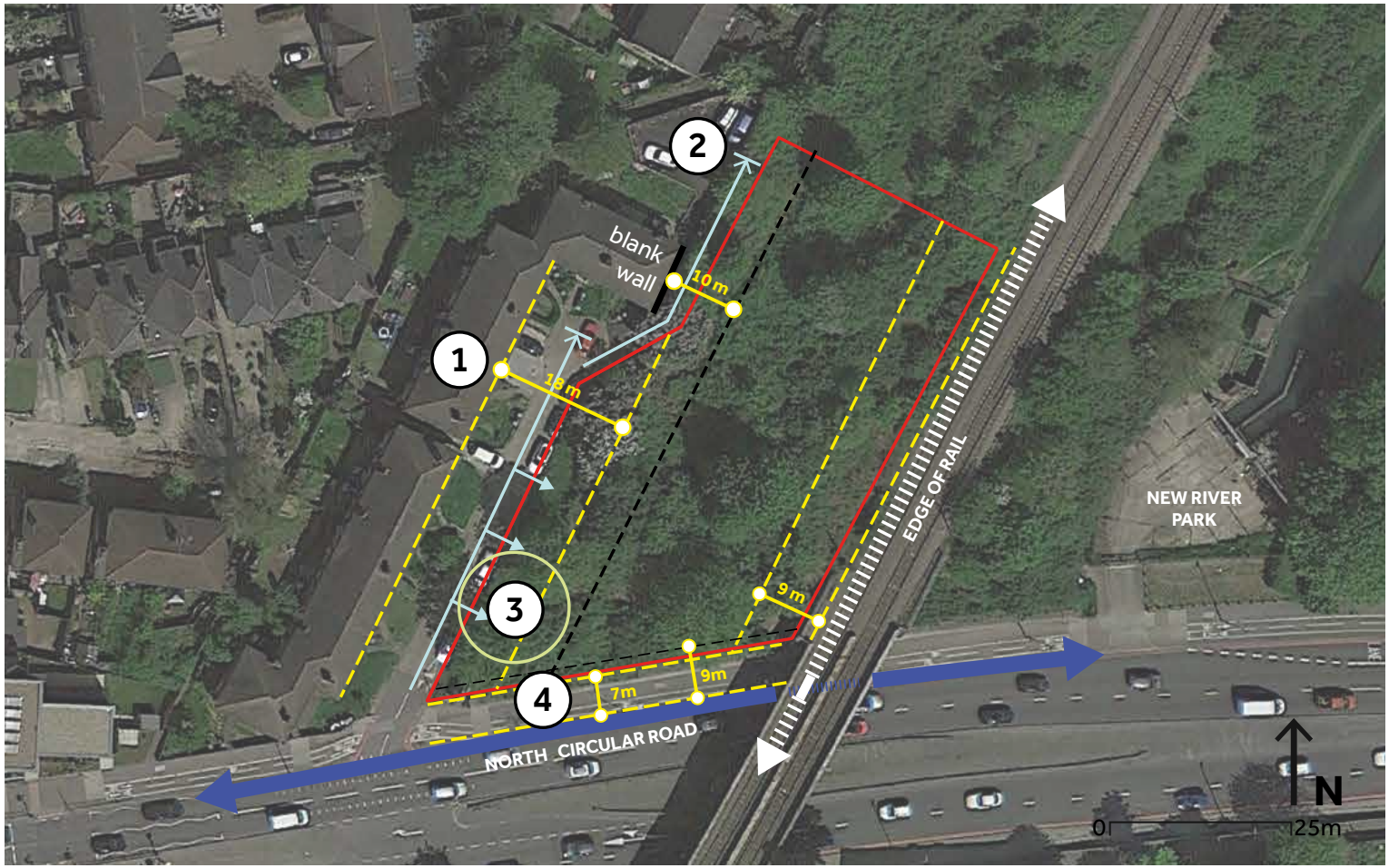
Site analysis - Pymmes Close



Site parameters - Pymmes Close



1. Minimum 18m distance from windows of adjacent properties - to ensure privacy.
2. Existing access to Pymmes Close maintained
3. Protect mature tree in the South Western corner.
4. Building line is shaped adjacent properties to maintain street character.

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5. Illustrative compliant proposals: Pymmes Close

Floor plans

Ground Floor

Upper Floor

5.1 Description

The flats are arranged around a central core and are 4 - 5 storeys in height. The larger mass of the flats is located at the southern end of the Close marking the junction with the A406 (where the larger scale is more in keeping with the scale of development along the A406 corridor). The lobby is accessed from the Close, encouraging safer streets and neighbourliness.

To the north of the site, are located the houses, each with front doors facing onto Pymmes close. The houses are two storeys reflecting the scale of the existing dwellings on the street. An attic storey could provide for additional accommodation. Each house has a front south easterly facing rear garden.

In this accessible location, parking is assumed to be 0.4 spaces per unit. Parking spaces are arranged along the eastern side of the street in a parallel parking, with passing spaces integrated with the landscape solution..

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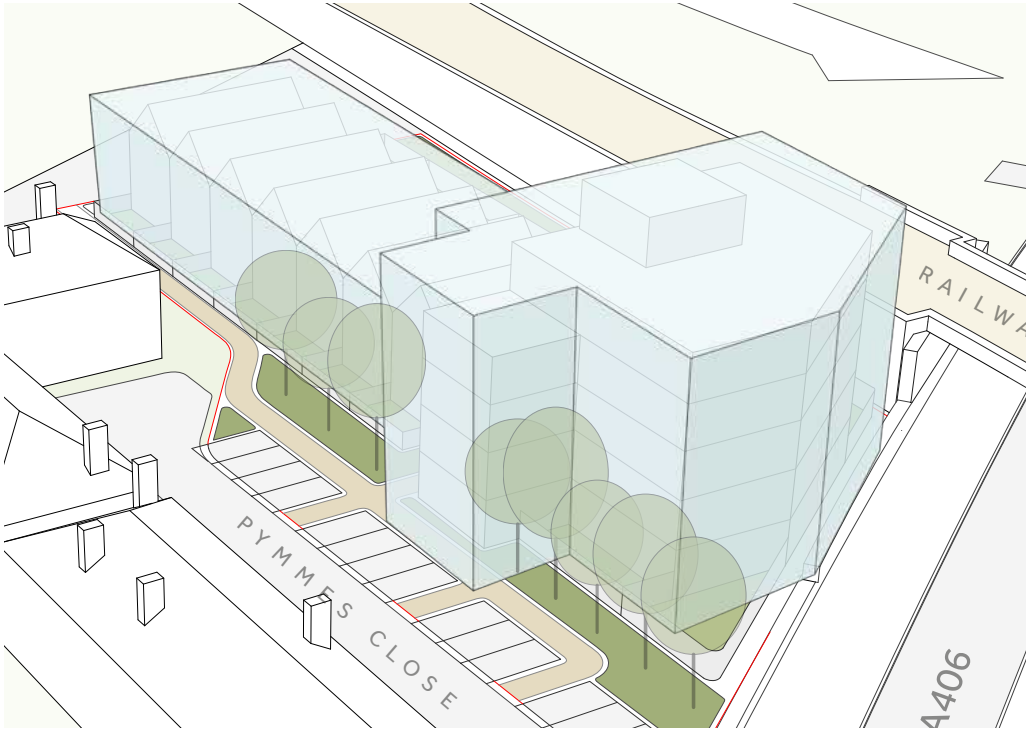
Illustrative proposal



Illustrative proposal within parameters

Illustrative compliant proposal

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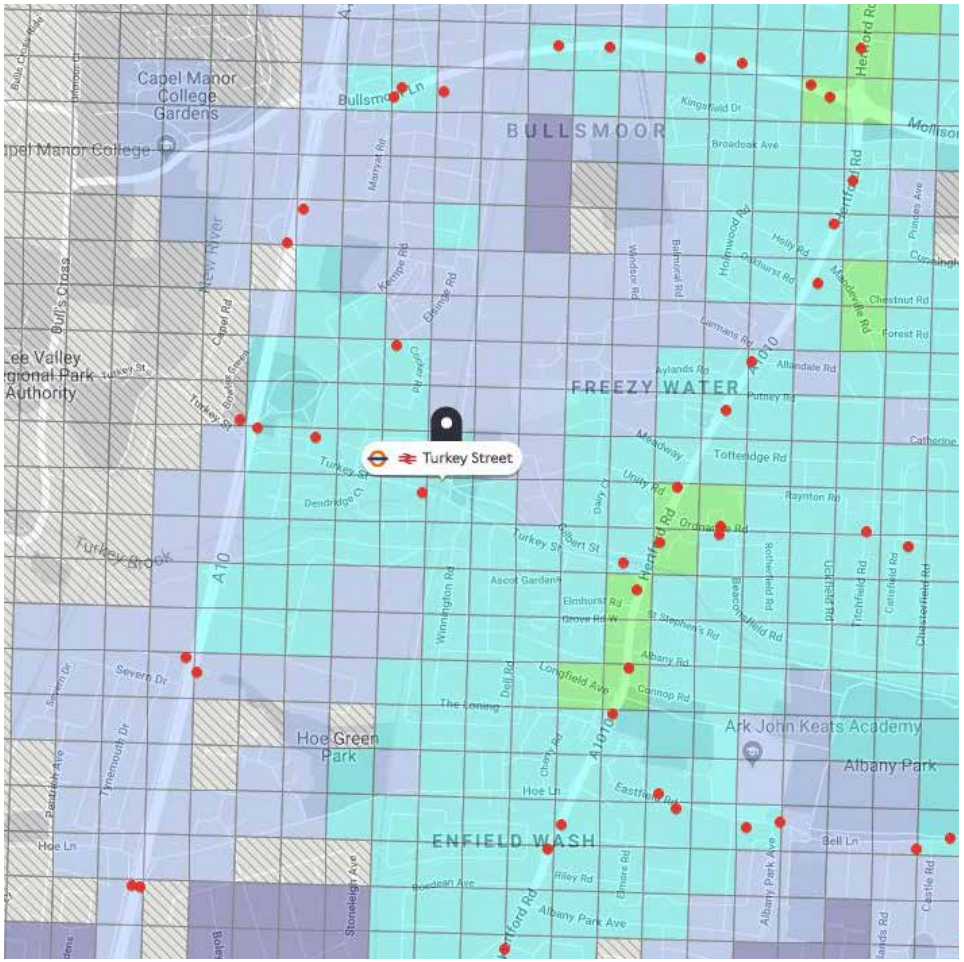
6. Small sites register

Turkey Street

800m distance from station

- Specimen small site



PTAL rating

Small sites register - Turkey Street: 3 specimen sites

Address	Description	Site area	Distance from station	Location plan
Chosen specimen site for design code.				
1. Dendridge Close (Turkey Street Hall)	Site area is currently occupied by Fancy Feet Academy, It is bounded by Turkey Street and Dendridge Close.	0.25 ha	200 m	
2. Great Cambridge Road		0.21 ha	450 m	
3. Turkey Street Car Park		0.07 ha	400 m	

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7. Area Design Code

Turkey Street

7.1 Historic Development

Turkey Street's existence was first recorded in the first half of the 15th century. The street runs alongside Turkey Brook which was originally called Maiden's Brook, running west to east across the area to the River Lea.

In 1572 Turkey Street was recorded as having a hamlet of ten houses on it. In the 17th century the infamous Plough Inn was constructed, as was the bridge across the Brook. Indeed, Turkey used to be navigable to this point and would explain the establishment of a settlement here. Further west, another bridge carried the street across the New River.

The railway running north south with services to Cheshunt arrived in 1891 with the opening of the station on Turkey Street. Initially residential growth in the area was slow and was not helped by the poor rail service to London which was indirect.

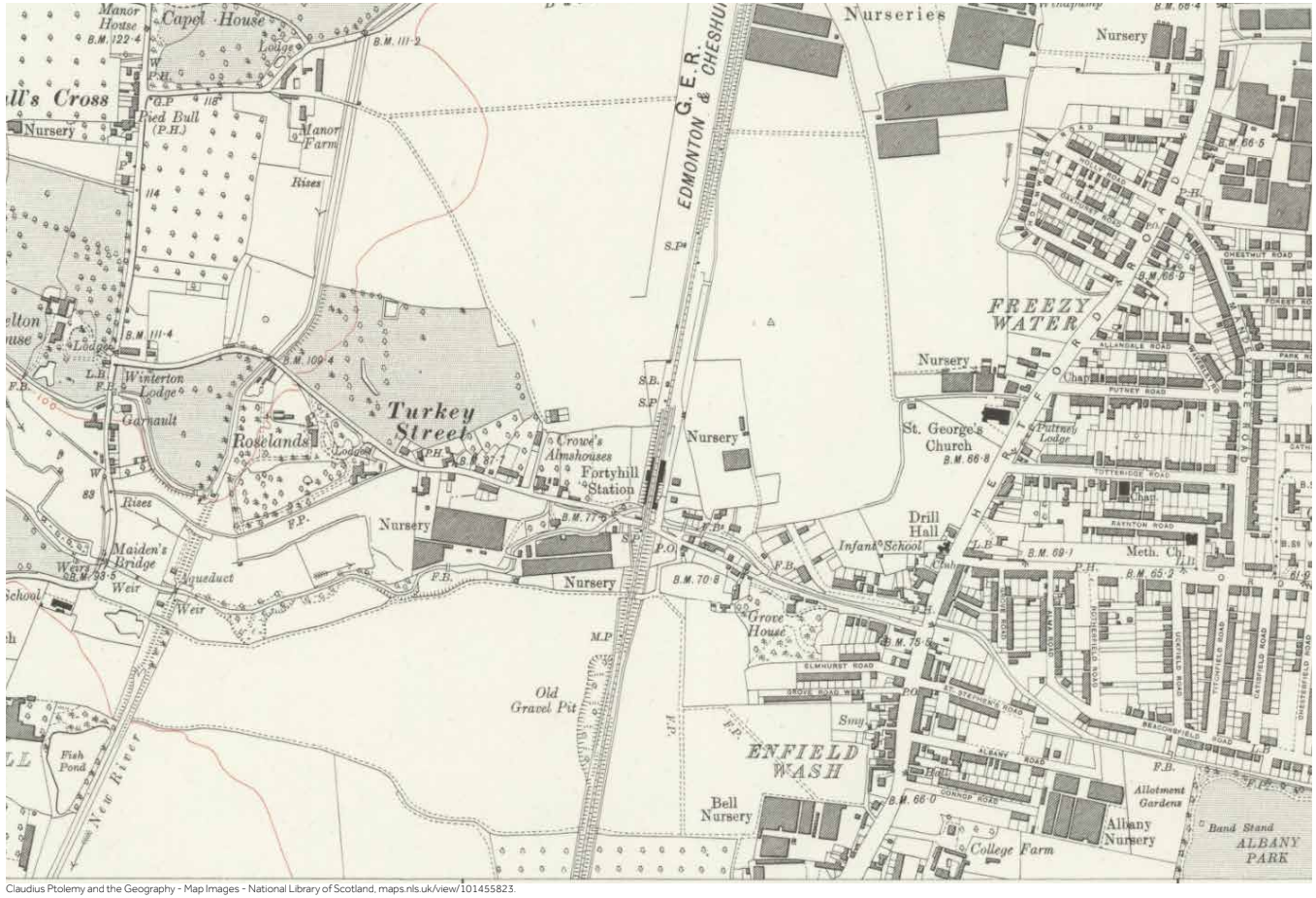
With the arrival of the trams in 1909, running on Hertford Road to the east of the area, passenger services to Turkey Street were stopped.

After World War Two, the council built large estates to the north. A few early-19th-century houses and cottages have survived on Turkey Street itself just to east of the station and are the subject of a conservation area.

50 years later, in 1960, with the introduction of electric trains, the station was reopened with service to Liverpool Street.

Wright, Colin. "Enfield." The British Library, The British Library, 15 Sept. 2008, www.bl.uk/onlinegallery/onlineex/ordsurvdraw/e/002os-d000000008u00084000.html.

Turkey Street in 1897



Claudius Ptolemy and the Geography - Map Images - National Library of Scotland, maps.nls.uk/view/101455823.

7.2 Turkey Street Area today.

The railway running north south and the Brook running east west divide the area into distinct quarters.

The south eastern quadrant, Enfield Wash, is made up of a large council estate of two storey terraced homes. Today these largely have rendered or pebble dashed elevations and concrete tile roofs but would originally have been brick and slate.

The south west quadrant is home to Enfield's graveyard and crematorium.

The north west quadrant has a further estate of council-built two storey terraced homes but also houses some pleasant Alms houses and a public park.

The north east quadrant comprise a further housing estate, open space and allotments. The estate is of a relatively higher quality. The homes are largely semi-detached constructed originally from brick but now are largely rendered with uPVC windows. The streets are generous enough to accommodate trees and soft areas. The housing stock quality is fair but the street character has been damaged by loss of gardens and garden walls as a result of large amounts of off-street parking.

The high street is located along Hertford Road and straddles Turkey Brook to the east of the Turkey Street Station Area. The building stock is largely brick built 19th C. Victorian stock - two to three storeys in height. The street is evidently busy with a wide variety of food offerings and shops of all kinds. The roof scape is rich and features a variety of heights, gables, dormers and pitched roofs.

The area's most significant housebuilding in recent years has taken place alongside the railway line on Teal Close, a cul-de-sac that in 2008 was said to be the cheapest street in north London.

A relatively high proportion of homes here are rented from the council. The demographics from the 2011 census, reveal that 44 per cent of residents were white British, 12 per cent were of black African heritage and 9 per cent came from Turkey.

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8. Building Design Code

Dendridge Close

8.1 Site Location

Dendridge Close is a 0.24ha site 200m from Turkey Street Station. It is bounded by Turkey Street in the north and Dendridge Close to the east. To the west is a sizeable surface car park serving the wider estate. To the south are the back gardens of adjoining residential properties. The site is vacant save for a small single storey shed. A distinctive mature willow tree is in the north east corner.

8.2 Street Character

The immediate street character is quite polarised. To the north is a 1970's modern council scheme comprising lower level 3 storey blocks and a 9 storey mid rise tower. Both are largely brick with little street-scape value.

To the west of the site, there is a run of four quite attractive simple Victorian cottages. The centre pair have a mansard roof and gothic arched windows.

To the east of the site and north of the road are some 1930's brick and render two storey terraces. To the eat and south of the road are relatively recent brick bungalows .

It is clear that the street is clearly primarily residential in character. It is quiet with only local traffic. The trees lining Turkey Brook are clearly visible throughout the area.

8.3 Layout

The street form breaks down at Dendridge Close due to the open-ness of the site and the object positive approach of the 1970's de-velopment to the north. Proposals for Dendridge Close should seek to repair the street in this location and respect the way in which the Victorian cottages address the street.

Dendridge Close although connected to Turkey Street appears remote and detached. The layout of the proposal should establish a connection between Turkey Street and the Close.

The existing street character is mainly houses with front doors open-ing onto the street. The proposal should incorporate housing with front doors and front gardens. The higher component at the en-trance to Dendridge could be used to enhance the mix by incorporat-ing flats.

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8.4 Form

The two storey scale of the adjacent cottages needs to be respected and incorporated into the design proposals. The massing immediately adjacent the cottages should not exceed the existing ridge line and any third storey be incorporated into a mansard or dormer arrangement.

8.5 Detailing

The site has been part of the settlement area since the 17th century. The adjacent Victorian cottages capture the underlying character of the area with arched windows, recessed doorways brick string course and clay tiled roofs.

New proposals should feature detailing in the brickwork that recognises the significance of the location in local history enhances the reading of the development to the passer-by.

8.6 Materials

Materials should be predominantly fair faced brick work incorporating detailing as described in 2.2.5.

8.7 Public Realm

The mature trees, particularly the willow are characteristic of the area and should be incorporated into the proposals.

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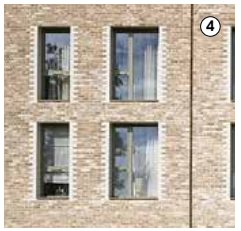
South Gardens - Macreanor Lavington

Horsted Village - Proctor Mathews



Evolution - Macreanor Lavington

Recessed Balconies

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Aylesbury Estate - Conisbee

GMV - Jestico + Whiles

GMV - Jestico + Whiles

Doorways and Entrances

Doorways should be welcoming and be a focal point on the facade. Canopies, recesses and lights enhance the arrival experience.

GMV - Jestico + Whiles

Kilburn Quarter - Alison Brookes

Cornerstone Architects

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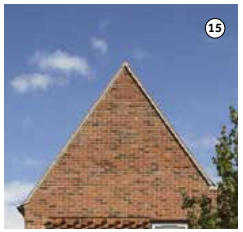
Gorleston Street - Farrells

GMV - Jestico + Whiles



Horsted Village - Proctor Mathews

Granville Road - Levitt Bernstein

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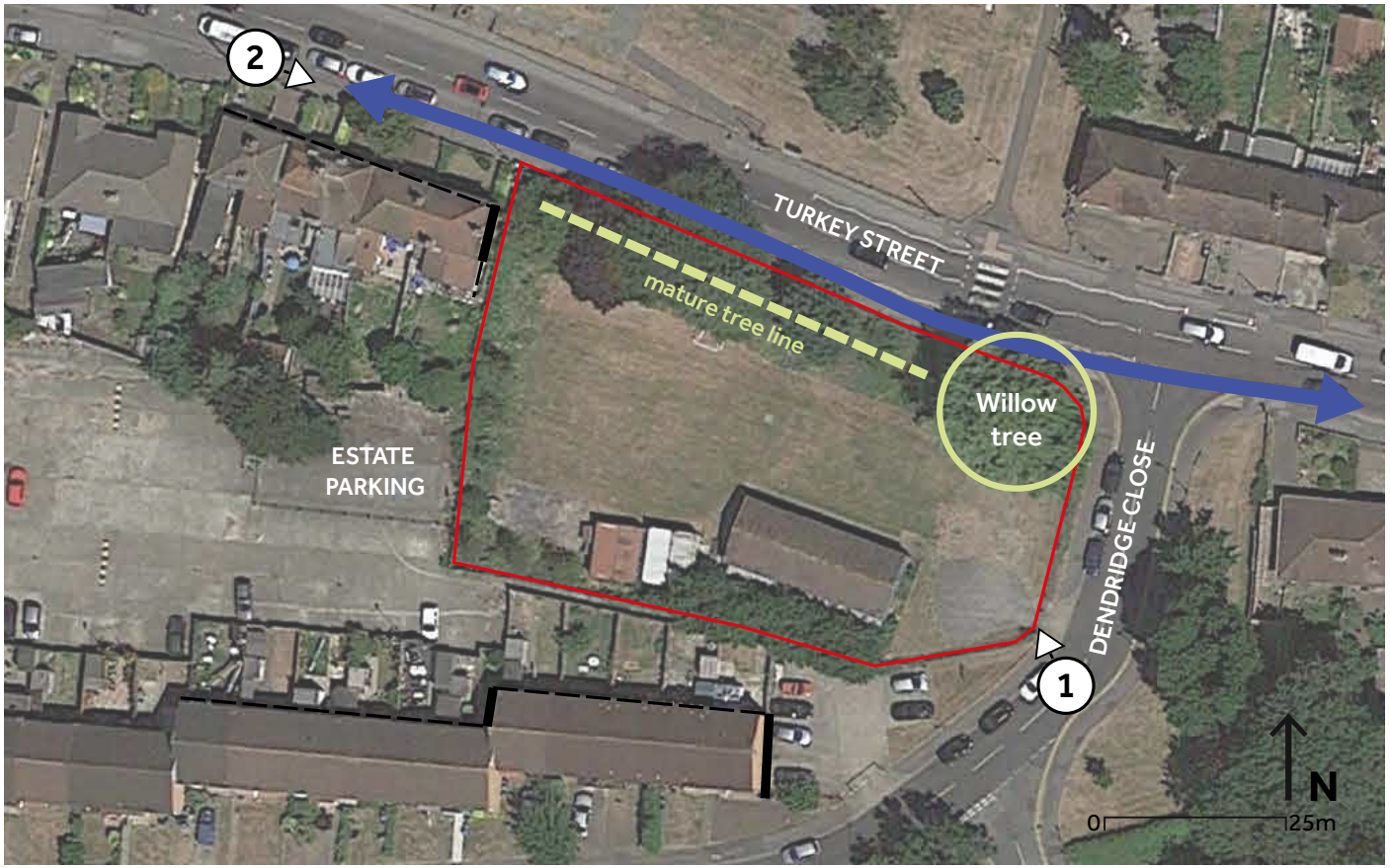
Site analysis - Dendridge Close



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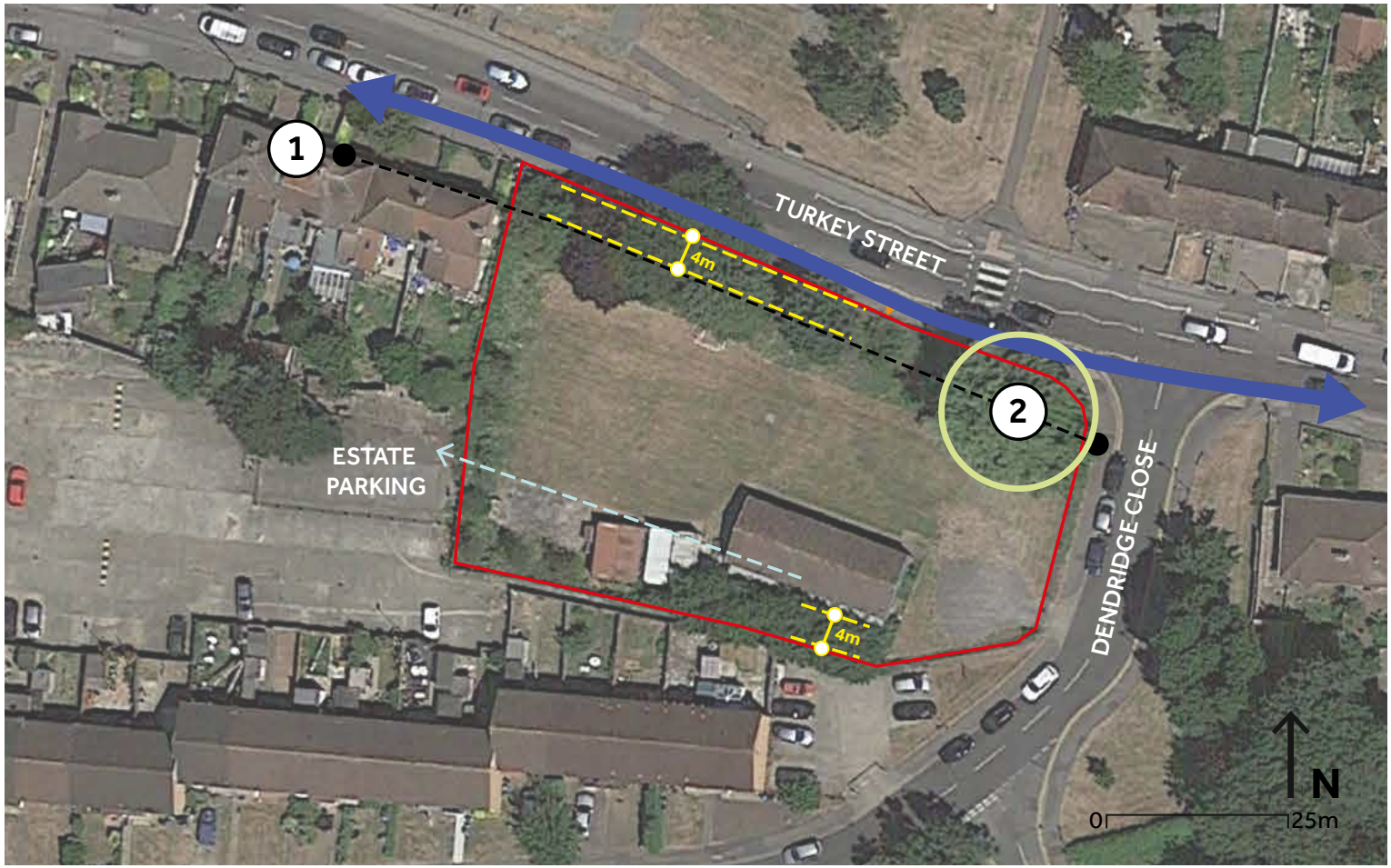
Site parameters - Dendridge Close



1. New building line on Turkey Street to follow and reinforce street alignment, with a 4m set back from back of pavement.

2. Protect mature Willow tree in the North East corner.

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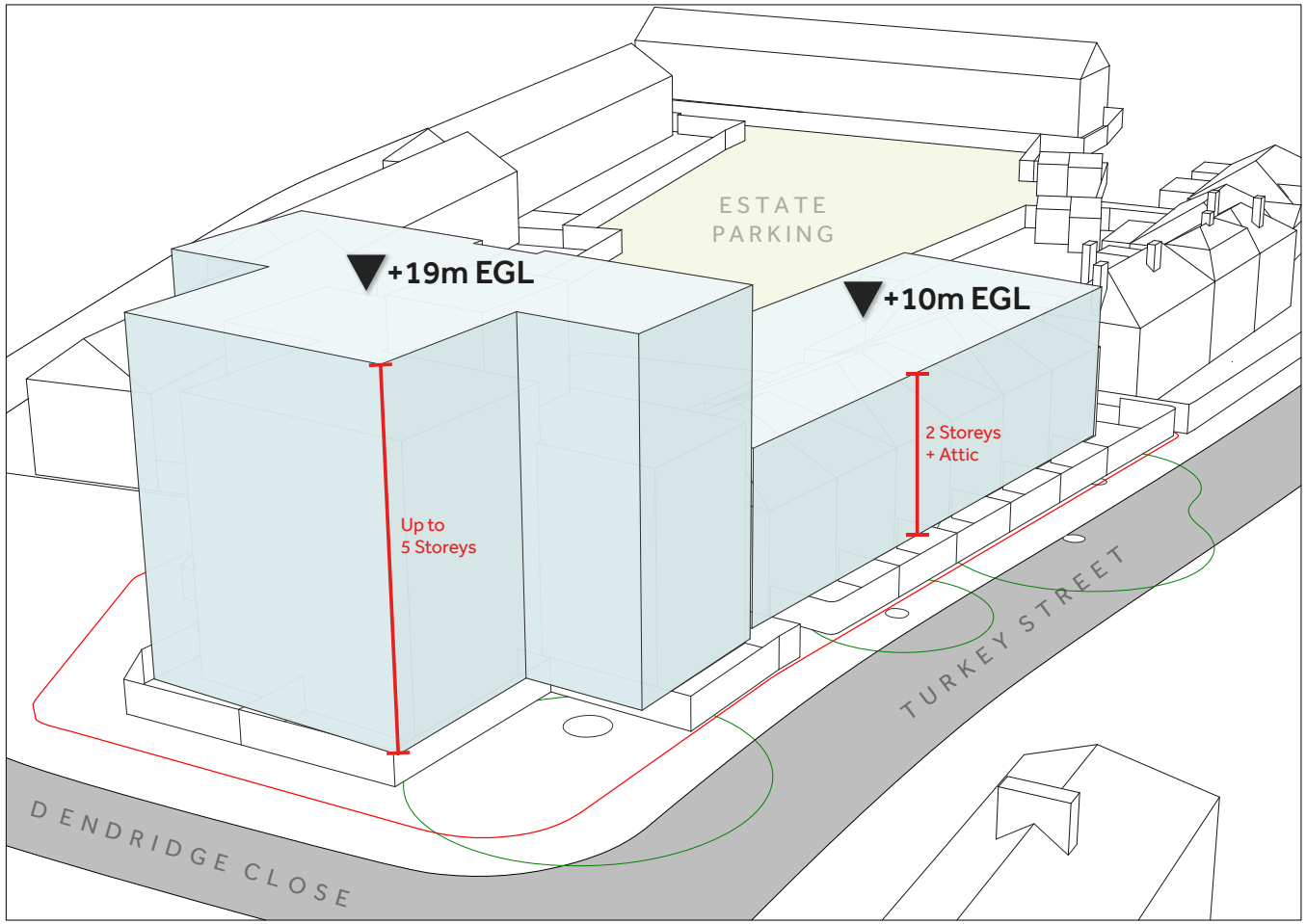
Site parameters - Dendridge Close



EGL - Existing Ground Level

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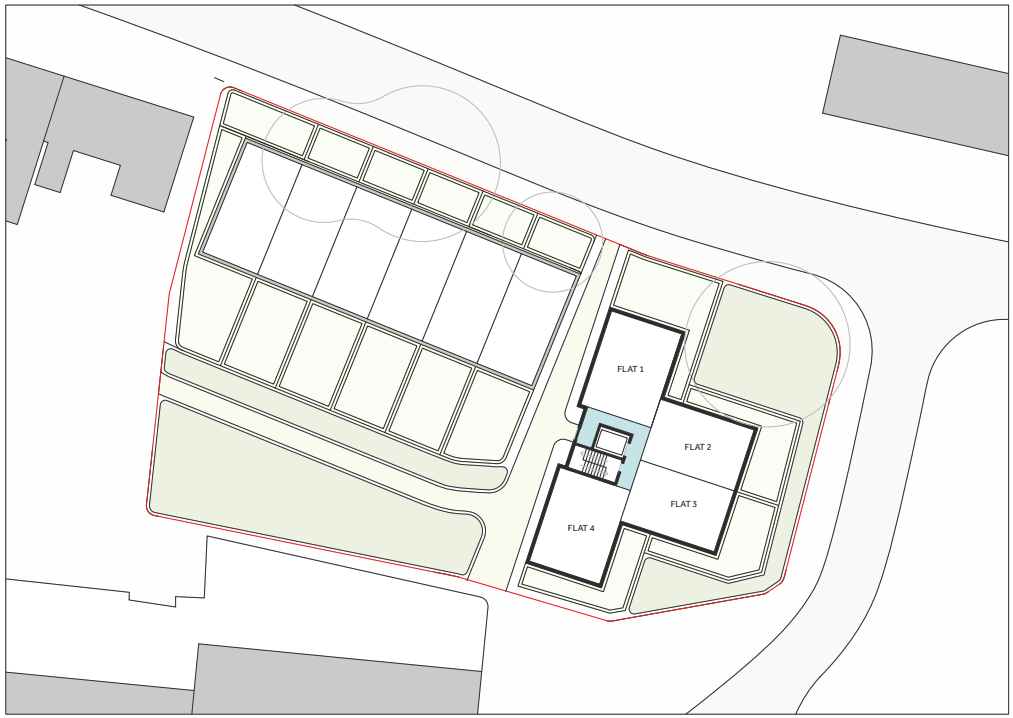
9. Illustrative compliant proposals

Floor plans

Ground Floor



Upper Floor

9.1 Description

The illustrative proposal comprises a mix of houses and flats arranged along Turkey Street and Dendridge Close.

The flats are arranged a central core and are 4-5 storeys in height. The larger mass of the flats is located at the eastern end of the Close marking the junction of Turkey Street and Dendridge Close. The lobby is accessed from Turkey Street. A communal space is provided for in the rear and which also provides access to the estate car park

To the west of the site, are located the houses, each with front doors facing onto Turkey Street. The houses are two storeys reflecting the scale of the existing dwellings on the street. An attic story could provide for additional accommodation. Each house has a front south facing rear garden with potential access to the communal space and car parking.

In location, parking is assumed to be 0.4 spaces per unit. Parking spaces are assumed to be accommodated within the estate car park.

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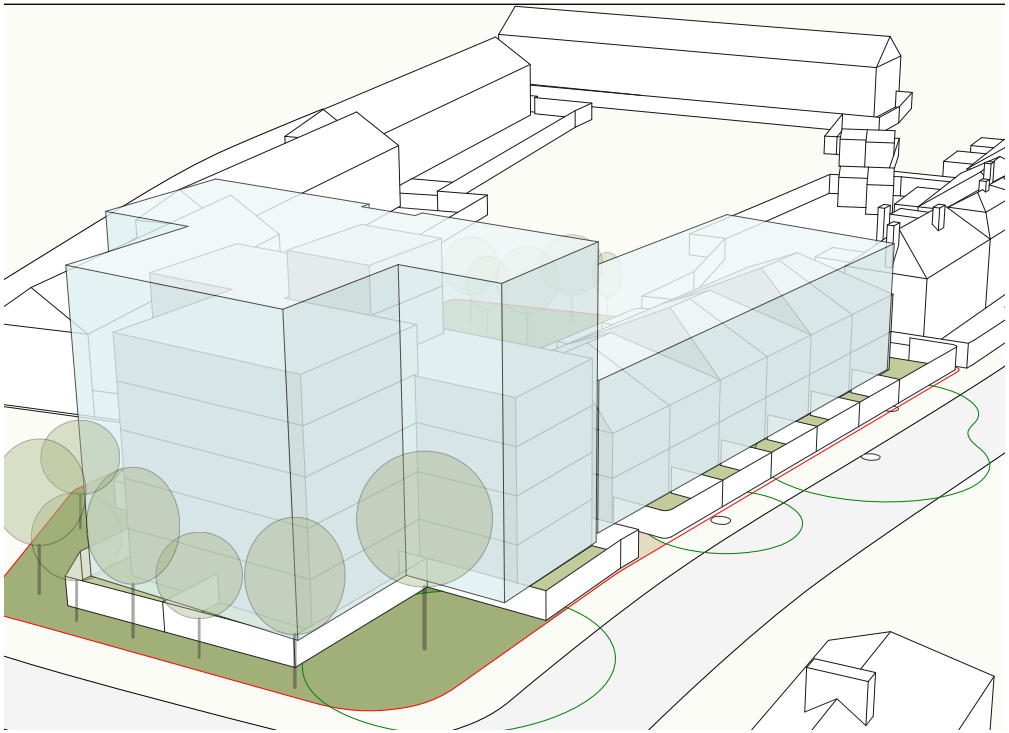
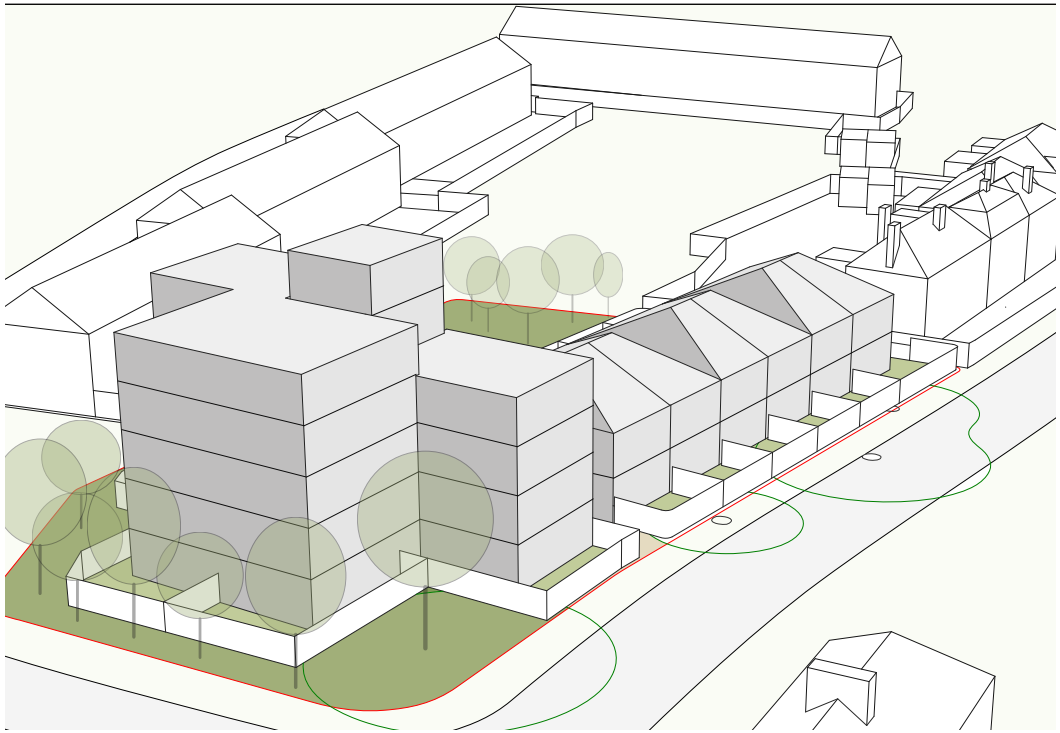
Illustrative proposal



Illustrative proposal within parameters



Illustrative compliant proposal

10. Conclusion

This document has demonstrated the material required to provide Design Code material for 2 sample sites in LB Enfield. Design Codes would be used to increase pre-planning certainty for applicants, and ideally lead to a substantial increase in both planning consents, and delivery of additional housing, on the smaller sites across the Borough.
It is observed that the Design Code material generated is considered to be the minimum required to deliver the stated policy objectives.

The Challenge

Scale of the task
There are over twenty rail and tube connected stations in LB Enfield. If one assumes that there are 100 sites in each area within 800m of a station, then a conservative estimate puts the scale of the task at over 2000 sets of design codes. Our team conducted a desktop study for one specimen site in each of two differing representative areas and took three weeks to complete. Whilst each study has a common format, the circumstances of each site are quite different, and do not give a huge degree of commonality.
To establish the scale of the task, at an accelerated rate of 2 sites per week and the assumption that 3 sites could be grouped together, pro-rata it would take that same team nearly twenty years to complete the task or twenty teams 1 year to complete.
Associated costs

The resource and financial implications of the exercise are huge, with the likely cost alone in the order of tens of millions of pounds. The ongoing updating and monitoring of the scheme will also be significant and an ongoing burden to the local authority and taxpayer without any real guarantee of housing uplift. We question the investment return balance from substantial upfront capital expenditure on Design Codes versus enhanced certainty of housing delivery.
Measuring Success

Success of the Design Codes approach would be proven through enhanced small sites identification, planning consents and housing delivery. However, in our brief desk top assessment of two small areas, we consider that the likely real-world constraints of multiple land ownership and leases are potentially the most apparent barriers to development rather than the level of planning risk.

Overall
The general thrust of Policy H2 Small Sites can be lauded in its efforts to promote small scale residential development and to involve small to medium sized developers, in an effort to accelerate housing delivery in LB Enfield.

However, it is considered that both in terms of its likely impact, let alone the cost and time implications, the provision of a borough wide Small Sites Design Code for LB Enfield, does not deliver an immediate or practical answer to dramatically increased housing delivery.

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Image credits

① "Gorleston Street." Farrells, farrells.com/project/gorleston-street.

② Solutions, Wemove Digital. MaccreanorLavington Architects - Futurehome, www.maccreanorlavington.com/website/en/project_3237.html.

③ "Proctor & Matthews Architects." Steepleton Retirement Community, www.proctorandmatthews.com/project/horsted-park-kent.

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⑥ "Aylesbury Estate South West Corner." Conisbee, www.conisbee.co.uk/project/aylesbury-estate-south-west-corner/.

⑦ "ProjectsGreenwich Millennium Village." Jestico + Whiles, www.jesticowhiles.com/projects/greenwich-millennium-village/.

⑧ "ProjectsGreenwich Millennium Village." Jestico + Whiles, www.jesticowhiles.com/projects/greenwich-millennium-village/.

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⑩ "Kilburn Quarter." Alison Brooks Architects, www.alisonbrooksarchitects.com/project/bronte-fielding/.

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⑫ "Cat Mountain Remodel | Austin Architects." Austin Architects | Residential & Commercial | Cornerstone, www.cornerstonearchitectsllp.com/cat-mountain-remodel.

⑬ "Gorleston Street." Farrells, farrells.com/project/gorleston-street.

⑭ "ProjectsGreenwich Millennium Village." Jestico + Whiles, www.jesticowhiles.com/projects/greenwich-millennium-village/.

⑮ "Proctor & Matthews Architects." Steepleton Retirement Community, www.proctorandmatthews.com/project/horsted-park-kent.

⑯ "Granville Road, Barnet." Brunswick Centre - Levitt Bernstein, www.levittbernstein.co.uk/portfolio/granville-road/.

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