

Are Nesil Caliskan's Housing Claims Accurate?

APPENDIX: Footnotes, analysis, and references

Claim #1:

A response to an FOI request showed that 1,417 of the 3,500 homes will be replacement homes for homes that will be demolished as part of the Council's regeneration plans. The Council will therefore be delivering 2,083 'more' (i.e. additional) homes not 3,500.

The distinction between 'more' and 'new' is important. Enfield's annual housing target is 1,250 additional (i.e. more) homes, not 1,250 replacement homes.

The response to the FOI request said that 310 of the 2,083 homes will not be classed as 'affordable'. This means the Council is building 1,773 'more' affordable homes, not 3,500.

The FOI response also stated that around 500 of the 1,773 homes would be shared ownership. Shared ownership is a tenure that can help some people to get on the housing ladder, but it is not an option that is affordable to most local people in Enfield in need of affordable housing. This means only around 1,270 of the 3,500 homes would be additional homes that would be genuinely affordable to local residents.

The commitment to 40% of these homes having 3 or more bedrooms is substantially less than what is required by the council's own planning policies and nowhere near the level needed. Enfield's Core Strategy (2010) and Development Management Document (2014) stipulate that 65% of Market Housing and 60% of Social Rented housing should have 3 or more bedrooms. Enfield's Local Housing Needs Assessment says that 71.5% of Market homes and 50% of affordable homes should have 3+ bedrooms.



The council had, until recently, been claiming the homes would be delivered by 2030, but this commitment will not be met according to the latest statement.

See also:

<https://enfielddispatch.co.uk/councils-2bn-spending-spree-will-double-borrowing/>

https://www.financefuturesenfield.co.uk/media/6302/enfield_council_plan_2020-2022_web.pdf

Claim #2:

Since 2018 Enfield has become one of the four worst performing councils in London for meeting housing targets.

The latest results published by the Department for Levelling Up, Housing and Communities on 14th January 2022 showed that Enfield met just 67% of its housing target between 2018 & 2021. Only three London boroughs performed worse than Enfield.

The 67% is a long way behind the London average (114%) and behind neighbouring councils Barnet (108%), Haringey (75%) and Waltham Forest (99%).

<https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

The GLA's Planning London Data Hub shows that the number of affordable homes built in Enfield fell significantly after 2018.

A total of 456 affordable homes were built in Enfield Between 2015 and 2017, but this fell to 186 between 2018 and 2020.

Only around 10% of new homes built in Enfield between 2018-2020 were affordable (below the London average of 18%). Enfield also had one of the lowest rates of affordable house building in London (ranked 29th out of 33 London boroughs)

Also see: <https://data.london.gov.uk/dataset/planning-london-datahub>

<https://betterhomesenfield.files.wordpress.com/2021/05/less-than-zero-may-21-final.pdf>

Claim #3:

See Council's Enfield Local Plan - Growth Topic Paper - May 2021 (e.g. points 6.3)

<https://new.enfield.gov.uk/services/planning/growth-topic-paper-lbe-2021- planning.pdf>

Claim #4:

See 'Statement of Common Ground with Greater London Authority (GLA) – March 2022' on Waltham Forest's Local Plan examination (LP1) webpage.

<https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-examination-lp1>

<https://www.walthamforest.gov.uk/sites/default/files/2022-03/GLA%20FINAL%20Statement%20of%20Common%20Ground%20210322%20v1.01.pdf>

Claim #5

See: **Letter from GLA to Enfield Council - September 2021 RE: Consultation on the draft Enfield Local Plan: 2019-2039**

*"... **there appears to be sufficient capacity to meet the required housing target for this local plan without Green Belt sites.** Moreover, bringing forward Green Belt sites at this stage, alongside non-Green Belt brownfield sites, risks undermining brownfield delivery and viability, particularly in the first 10-year period. Housing development on Green Belt land is very often not fraught with the complexities of delivering housing on previously developed land and can offer much greater financial rewards. There is no 'brownfield first' approach to mitigate this potential risk and we are concerned that in this context, market responses may not align with the borough's stated aims - with potentially significant impacts on brownfield sites and sustainable development. The overall approach therefore seems premature in this context."*

<https://enfielddispatch.co.uk/wp-content/uploads/2021/09/Mayor-of-London-response-to-Enfield-Local-Plan-Sep-2021.pdf>

Also see:

This plan is not the plan Enfield needs: Better Homes Enfield's response to Draft Local Plan Reg 18 Consultation – Better Homes Enfield (betterhomes-enfield.org)

<https://betterhomes-enfield.org/2021/09/10/this-plan-is-not-the-plan-enfield-needs-better-homes-enfields-response-to-draft-local-plan-reg-18-consultation/>

<https://betterhomesenfield.files.wordpress.com/2021/09/bhe-response-to-draft-local-plan-090921-incl-app.pdf>

Claim #6

Of the green belt sites identified for housing in the draft Local Plan only part of the Crews Hill site is near a train station and the sites would not have good access to public transport.

See: **Letter from GLA to Enfield Council - September 2021 RE: Consultation on the draft Enfield Local Plan: 2019-2039**

"We also have some concerns about the suitability of the proposed locations in terms of their sustainability, particularly relating to transport and also the level of harm identified. Were Enfield able to demonstrate very clearly the exceptional circumstances required to release Green Belt land, in accordance with national and regional policy, then key issues

would remain to be addressed. **The chosen areas offer very low public transport accessibility and are not within, what is considered to be, a reasonable walking distance to the nearest town centre.**"

<https://enfielddispatch.co.uk/wp-content/uploads/2021/09/Mayor-of-London-response-to-Enfield-Local-Plan-Sep-2021.pdf>

Furthermore, here is what Transport for London (TfL) had to say about the green belt sites proposed for housing:

Crews Hill

"The proposed placemaking area immediately around Crews Hill station has a Public Transport Access Level ranging from only 1a to 1b (on a scale of 1a – 6b, with 6b being the highest), with the wider area recording PTAL 0."

"With such a low level of public transport connectivity either current or planned, the development of this area would be likely to be car dependent. "

"It is very unlikely that the design, form and layout of transport infrastructure could create a place where walking, cycling and use of public transport is the natural choice even if this were affordable."

"Although we understand that further assessment work is underway to try to establish transport impacts and mitigation, we are not confident that the poor public transport connectivity and consequent reliance on car use could be overcome even with substantial investment. As it stands, TfL would be likely to raise strong objections to this policy on strategic transport grounds."

Chase Park [Vicarage Farm]

"It is claimed in 3.10.2 that: 'The area is relatively well served by public transport, with three stations within an approximately 30-minute walk, and two further stations within a 45-minute walk. It also has regular bus services running through and around the area.' This does not reflect TfL's view. A 30–45-minute walk to a station is not considered to provide good access and when measured on WebCat the PTAL for most of the proposed development area is 1a to 1b with parts of the proposed placemaking area recording PTAL 0. "

"With such a low level of public transport connectivity either current or planned, the development of this area would be likely to be car dependent. This would exacerbate

problems of road network capacity. It is very unlikely that the design, form and layout of transport infrastructure could create a place where walking, cycling and use of public transport is the natural choice even if this were affordable.”

“The focus for large scale mixed use development should be on growth corridors, town centres and Opportunity Areas, where there is more prospect of planned investment in the public transport network.”

“As it stands, TfL would be likely to raise strong objections to this policy on strategic transport grounds.”

<https://enfielddispatch.co.uk/wp-content/uploads/2021/09/Mayor-of-London-response-to-Enfield-Local-Plan-Sep-2021.pdf>

In terms of the type of homes that are likely to be built near a station, the London Plan Policy H10 states that housing mix should have regard to:

“the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity”

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf