



Q2.15: IS THE EVIDENCE ON THE NEED FOR DIFFERENT GROUPS IN THE COMMUNITY, INCLUDING THE TYPES OF HOUSING DELIVERED, BASED ON ROBUST AND PROPORTIONATE EVIDENCE? DOES THE LOCAL HOUSING NEED ASSESSMENT (2020) REPRESENT AN UP-TO-DATE ASSESSMENT OF NEED?

Summary

1. The Enfield Over 50s Forum made representations relevant to Q2.15 which specifically raise issues with the Local Housing Needs Assessment (the LHNA) i.e. 01765-2-1, 01765-4-1 and 01765-3-1.
2. In short, the needs for different groups in the community set-out in the Plan and supporting Topic Papers, including the types of housing delivered, is not based on robust and proportionate evidence and the LHNA does not represent an up-to-date assessment of need, and accordingly the Plan is currently unsound.
3. Issues with the evidence of need of different groups fall broadly into two categories (A) issues with the Council's interpretation of the LHNA and (B) issues with the LHNA itself.

(A) Issues with interpretation

4. The Council's interpretation of the LHNA, does not adequately account for the needs of existing households, including older households looking to downsize or wanting to move to a more manageable property.
5. As explained in our representation (01765-2-1), the LHNA sets out three housing mix scenarios, two of which attempt to incorporate the needs of existing households e.g. include older households. These two scenarios, called the Aspiration and Expectation scenarios, were not incorporated into the Plan, or considered in the Housing Topic Paper (the HTP). Instead, the Plan uncritically adopts the outputs of the 'Demographic baseline' scenario and then incorrectly imposes them across the Plan.
6. The Plan's reliance on the 'Demographic baseline' scenario is highly problematic, i.e. the Plan is fundamentally flawed as a result.

Problems with the Demographic baseline

7. The 'Demographic baseline' scenario only relates to 'anticipated new households over the plan period and not the household population as a whole' (01765-2-1, page 2, footnote to table taken from the LHNA).
8. In other words, the Demographic baseline does not incorporate the needs of existing households. This point is made repeatedly in the LHNA e.g. 9.11, 8.7, 8.22 and in the 'Notes' for Tables 8.1 and 8.5. Not incorporating the requirements of existing households is a major limitation with far reaching consequences for the Plan.

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9. The Plan also interprets and presents the outputs of the Demographic baseline as requirements for newly built homes, but this is also a major error. The LHNA explains the Demographic baseline figures quoted in LHNA Table 8.2 do not set requirements for new dwellings e.g. Point 9.13 of the LHNA says:

'It is not possible to translate the demographic needs of new households into a precise requirement for new dwellings in terms of type and size' and says *'this is because need and demand will arise from existing households as well as new, and supply will be available from the existing stock as well as new build properties'* (LHNA, point 8.22).

The LHNA repeatedly reiterates the point that the requirements of the Demographic baseline could be met from existing stock e.g. see LHNA 8.10, 8.14, 8.21, 9.12, C.15 and Figure C.2, but neither the Plan itself, nor supporting Topic Papers such as the HTC, appear to consider this important information at all.

10. It is particularly important to consider existing housing stock in Enfield, as, for example, over-three quarters of privately owned dwellings in Enfield have 3+ bedrooms, and 75% are underoccupied, both of which are higher than London averages (Census 2021). Notably, overcrowding in the owner-occupied sector has fallen in Enfield since the Census 2011, despite the newly delivered market stock being predominantly 1–2-bedroom homes.
11. Neither the Plan nor the HTP take the existing stock of different sized owner occupied homes into account. As a result, they are misleading and not compliant with the PPG for assessing Housing needs (i.e. [PPG Paragraph 023 Reference ID: 2a-023 20190220](#)).
12. Furthermore, the Demographic baseline scenario does not account for market signals e.g. affordability. The LHNA repeatedly comments, that regardless of the outputs of the Demographic baseline, there is no guarantee newly forming households would be able to afford larger properties e.g. see LHNA 8.4, 8.7, 8.14, 8.15, 8.21, 9.12. For example, LHNA 9.12 says,
- 'Whilst new households may need larger homes, according to their demographic needs, this does not mean they can afford to buy or rent new homes in the size they need. The largest proportion of properties in the existing stock of dwellings in the borough have 3 bedrooms. This suggests that the existing stock will provide a reasonable supply of homes to buy or rent for larger households that form.'*
13. The Council's uncritical reliance of the Baseline demographic scenario as a proxy figure for construction targets generates absurd outcomes, which should have sounded warning bells e.g. based on the Baseline demographic scenario the proportion of new market tenure homes (50%+ of the homes delivered) required to have 3+ bedrooms = 71.5% (reported in the HTP, Table 22), which is far too high.
14. A comparison with GLA figures, similar boroughs, or the Council's previous assessment should have rung alarm bells about the 71.5% figure. The Borough's [2015 SHMA](#) proposed that 50% of market sector homes have 3+ bedrooms (SHMA 11.5.11). The GLA's SHMA 2017, suggested 45% of market tenure homes should have 3+ bedrooms (GLA SHMA 2017, Table 1: Net annualised requirement for new homes in London, 2016 to 2041). Waltham Forest's recently adopted Local Plan set a preferred Dwelling Mix of 30% Market homes to have 3+ bedrooms. These differences arise because they account for existing stock, as well as market signals and concealed households (discussed later).
15. Evidence shows the market will not support this dwelling mix that flows from the Council's use of the Baseline demographic scenario. An example of this - and the real-world problems it creates - can be seen at the Bury Street West development in Enfield. This scheme delivered 50 award winning new houses in December 2022. Most (32) have 3+ bedrooms, of which 17 are owner occupied. Sales of these larger owner occupied homes has been very slow and in July 2023 [the Council issued a warning](#) about the impact of being unable to sell them on affordable housing delivery. There were still 2-4 of the 17 properties unsold in January 2025, according to the [website](#) despite being keenly priced. The open market simply cannot bear the level of family-sized homes proposed because it is

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not genuinely needed, and the attempt to deliver them will ultimately slow down the delivery of the types of new homes Enfield actual needs, including affordable homes.

16. Our representation (01765-2-1) explains that the LHNA itself recognises the limitations of the Demographic baseline, which is why it provides further scenarios which attempt to incorporate the needs of existing households, including older households. The LHNA refers to these as the 'Aspiration' and 'Expectation' scenarios.
17. The LHNA says regarding the output of these scenarios;

"Further analysis of household aspirations and expectations suggests a likely need and demand for more 2 bedroom properties and an increasing need for level access accommodation, driven by the requirements of an ageing population." (LHNA 8.8)

"Table C.7 summarises the outcome of the dwelling type/mix scenario analysis. The key message is by taking into account what people aspire to and what they expect to, there is an increased emphasis on level access accommodation and smaller properties." (LHNA C.16)
18. These LHNA scenarios reduce the need for homes with 3+ bedrooms i.e. the overall need falls from **60.8%** (overall) in the Demographic Baseline to **44.2/44.1%** i.e. 1–2-bedroom properties become the priority. This suggests the level of need within the owner-occupied tenure for housing with 3+ bedrooms would be under 40%.
19. Our representation suggested the Aspiration and Expectation scenarios are *"a more realistic housing mix forecast, given the needs of both older and younger residents and the likely need for 1-2-bedroom apartments"* (01765-2-1, page 2), as, it would address the potential risk of *"... high numbers of older residents looking for a smaller single level home to downsize to will be competing with high numbers of younger buyers who are currently concealed households"* (discussed later).
20. We have read the Council's response to our representation and were disappointed that they had not explained why they used the Baseline demographic scenario as opposed to one of the other scenarios reported in the LHNA, which provide a far more accurate and balanced estimate of housing mix needs (although even these estimates do not account for Concealed households in the owner occupied and intermediate affordable tenures). We would have expected the Council's reasoning to have already been explained in the HTP or explained by the Council in its response to our representation, but as neither has occurred we assume the Council has no answer, and has therefore not reasonably considered the housing needs of the Borough, but has instead cherry-picked data to suit a predetermined spatial strategy.
21. As a result, we do not consider the Plan to have been positively prepared in terms of understanding and responding to the Borough's existing and future housing needs and that the current proposed strategy, which substantially underestimates the need for 1-2 bedroom homes, is not soundly rooted in evidence and is therefore unsound.

(B) Issues with the LHNA itself

22. Issues with the LHNA itself can be summarised as (a) failing to account for the needs of Concealed households (in the owner occupied and intermediate affordable tenures), (b) failing to account for the needs of students and (c) being out-of-date.

Concealed households

23. Census 2021 showed that Enfield has a very high number of Concealed households (the second highest in London) and that between 2011 and 2021 the number of families officially classified as 'Concealed' increased by 60%.

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24. The LHNA specifically mentions Concealed households just once (page 142), and there is no evidence to show that that the housing mix needs of Concealed households needing market tenure housing or intermediate affordable housing were considered at all.
25. The LHNA underpins the HTP; the HTP does not mention Concealed households even once, which is remarkable given the very high and increasing number of Concealed households in the borough.
26. Whilst the LHNA does not consider the needs of Concealed households, the [LBE 2015 Strategic Housing Market Assessment](#) (12.3.5) did, and found **94% of concealed households required a property with 1 or 2 bedrooms**. This 2015 SHMA was part of the evidence base for Regulation 19 Consultation but not included in the evidence base for the Examination.
27. We have read the Council's response to our concerns about Concealed households in the Regulation 22 Consultation statement which says:

"The Enfield Housing Topic Paper 2024 demonstrates that the housing mix is based on a robust evidence base, including the Local Housing Needs Assessment (2020), which accounts for a broad spectrum of housing needs across the borough, including for older residents and concealed households."

Unfortunately, we must dispute this as we could find no analysis whatsoever related to the housing mix needs of Concealed households who require market tenure or intermediate affordable housing i.e. who do not qualify for social housing.
28. Accordingly, we do not consider the Plan to be positively prepared in terms of understanding and responding to the Borough's existing and future housing needs and that the current proposed strategy, which substantially underestimates the need for 1–2-bedroom homes, is not soundly rooted in evidence and is therefore unsound.

Students

29. In addition, our representation noted that the needs of Students had not been accounted for (01765-2-1, page 3).
30. We are aware that the Inspector requested further information about this (PQ21a), and we have read the LPA's response, which in our view is unsatisfactory (IN1). A simple analysis of Census 2011 and 2021 data shows Enfield has a sizeable adult student housing market, outside of 'communal educational establishments' i.e. in the Private Rented Sector. This has an impact on the types of homes needed in the borough, particularly as students will be competing for the cheapest properties which are in short supply.

Out-of-date

31. Our representation also raised concerns about the age of the LHNA and the impact this had on estimating needs for specialist accommodation (01765-4-1).
32. One problem is that the LHNA only covers the period 2018 to 2036, not the actual plan period (2019-2041), which means its estimates for Supported and Specialist Housing are missing 5-years of data (roughly 23% of the plan period). As such, they do not accurately represent need over the plan period - particularly given the rate at which Enfield's population is changing i.e. ageing.
33. The LHNA submitted as evidence [[HNE2](#)] is out-of-date:
 - a. It is tailored to 2018-2036, whereas the Plan period is 2019-2041.
 - b. It was published in 2020, nearly 4-years prior to the submission date and relies on data that is far older e.g. 2011 Census data (over 13-years old), and [2014 MHCLG housing projections](#) (the agency who conducted the

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assessment does not appear to have used the 2014 data for 4-5 years – instead they have, since late 2020, referred to [ONS 2018-based household projections](#) - released June 2020 - as its analysis base for other authorities e.g. [Tonbridge and Malling Borough Council](#), [Preston](#), [Trafford](#) and [Leeds](#), which would generate different results if used for Enfield)

- c. The age of Enfield's LHNA is unusual; it was 40 months old by the time the Plan reached Regulation 19, far older than the LHNAs used by other London LPAs at this stage.
 - d. Since it was published, Enfield's Housing Register has doubled, and the ratio of Private Rented Sector households receiving Housing Benefit has increased dramatically.
 - e. There have also been [3 x NPPF updates](#), a London Plan adopted (2021), a new Census, as well as the aftermath of Covid-19, [recognition of falling birth rates](#), [changes to work patterns](#), an energy and cost of living crisis, a building safety crisis, and [sharp increases interest rates, rental costs](#) and [construction costs](#), which have easily outstripped increases in sales values.
34. We note the Inspector asked the LPA about the age of the LHNA and their response ([01/11/24](#)) said 'There is no definition describing whether evidence is up to date in national policy or guidance.' However, the [Procedure Guide for Examinations](#), states:
- '1.12. Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information.'*
35. This guidance also says, 'in the interests of consistency, efficiency and fairness, all parties should follow its general principles.'
36. In regard to preparing plans, Paragraph 31 of the [NPPF 2023](#) says 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.' The LHNA does not cover the relevant period and does not incorporate up-to-date evidence (e.g. the Census 2021, ONS 2018 projections, changes to the PRS and housing register etc.). It does not justify the policies concerned as it fails to represent the needs of existing households – including older households wanting to downsize, as well as concealed households and students.
37. NPPF Paragraph 35 requires plans are 'Justified' which includes being 'based on proportionate evidence'; as well as 'consistent with national policy', including Paragraph 31. The LHNA, and the Council's interpretation of it does not represent proportionate evidence.
38. Simply put, the LHNA is too old, it is out-of-date and has "been overtaken by events." It is no longer relevant, as it does not reflect up-to-date market signals and provides forecasts that are now invalid and have been for years. It is notably older than the LHNAs relied on by other London Boroughs at the Regulation 19 stage.
39. The marked difference between the up-to-date information and the out-of-date data used in the LHNA are significant, and will have a considerable impact on key outputs, particularly estimates of the sizes and types of homes needed, and consequently the policy implications that flow from this.
40. This appears to have happened due to the considerable length of time that elapsed between Regulation 18 and Regulation 19 i.e. it took the LPA twice as long as other London Boroughs to proceed from Reg 18 to Reg 19. It would have been helpful if the LPA had updated the LHNA with more up-to-date information during this time lapse, but it did not do so.

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41. It would also have been helpful for the LPA to have addressed and discussed the age of the LHNA in the Housing Topic Paper, including the impact of updating core figures in the document with the most recent data as suggested by the PPG (e.g. changes to PRS rents, increased housing benefits, and changes to the waiting list), as well as considering the implications of the Census 2021, however the LPA did not take this opportunity. In fact, the HTP 2024 continued to quote out-of-date figures from the 2011 Census.
42. The approach taken has not complied with examination guidance in terms of evidence, or NPPF Paragraph 31, nor has it been demonstrated that the Plan is 'Justified' due to the reliance on out-of-date evidence, and as a result the Plan is currently unsound.
43. To become 'sound', the LHNA needs to be updated as soon as possible, and the results reflected in revisions to the plan and plan policies, as necessary. We expect the resulting modifications to be extensive, and potentially beyond the scope of main modifications.

Q2.16: DOES THE PLAN MAKE ADEQUATE PROVISION FOR THE NEEDS OF OTHER GROUPS IN THE COMMUNITY, INCLUDING BUT NOT LIMITED TO OLDER PEOPLE?

44. No - Please see response to Q2.15

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