

Written Statement

Matter 2 - Better Homes Enfield

Introduction.

Thank you for the opportunity to provide a response to the Inspector's questions. We hope our statement is helpful.

This statement is based on our objections:

- 01708-1-1, Response to the Housing Topic Paper
- 01708-5-1, Chapter 8: Policy H2: Affordable Housing
- 01708-6-1, Chapter 8: Policy H3: Housing Mix

Issue 2.3: Whether the approach to meeting the needs of different groups in the community is justified, positively prepared, consistent with national policy and in general conformity with the London Plan.

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. No, the housing need for different groups is not based on robust and proportionate evidence, and the Local Housing Needs Assessment 2020 [**HNE2**] (*the LHNA*) does not represent an up-to-date assessment of need, because:
 - (a) Outputs are misrepresented. Claims about the types of housing needed, purported to be based on the LHNA, do not accurately reflect the LHNA and under represent the needs of existing owners, older households, and those living precariously in the private rented sector.
 - (b) The LHNA did not adequately assess the needs of some groups in the community, including Students, Concealed households, and Households needing HMO accommodation.
 - (c) The LHNA is not an up-to-date assessment of need, and no longer reflects Enfield's housing needs by a considerable margin.

2. Each of these issues are addressed in our representations and below.
3. These issues have infected the Plan; Better Homes Enfield believe this has resulted in policies and strategies that are disconnected from genuine local housing needs, which will result in less housing delivered overall, increased viability/deliverability challenges and fewer genuinely affordable homes.

Misrepresented outputs

4. The LHNA's findings regarding the need for (i) Affordable Homes and (ii) for different sized homes (Dwelling Mix), are significantly misrepresented in the Plan and Housing Topic Paper [TOP3] (*the HTP*).

Affordable Homes

5. Our representation explains the 50/50 split proposed between Social Rented and Intermediate Tenures does not reflect a balanced interpretation of the LHNA [01708-5-1, Chapter 8: Policy H2: Affordable Housing, page 7, point 32].
6. The LHNA caveats the outputs of the modelled need for Social Rented housing, recommending it be considered a minimum figure, because it does not account for the large number of households living precariously in the private rented sector on housing benefit, who are not included in either estimate of need for affordable housing [HNE2, the LHNA, points 33, 6.14, 6.23, Table 6.1]. The LHNA urges readers to recognise limitations of the modelled output and to consider the evidence of the wider need for subsidised rent [HNE2, the LHNA, points 6.15 to 6.23]. These caveats and recommendations were ignored by the Council, without explanation.
7. Accordingly, the Plan and HTP do not properly consider this evidence and therefore the needs of the large number of households living precariously in the PRS on housing benefit are unaccounted for, and the need for Social Rent housing is significantly underrepresented.

Dwelling Mix

8. The HTP says the LHNA identifies a need for 71.5% of new market homes to have 3+ bedrooms [TOP3, the HTP, Table 22 and point 6.19]. This is based on the output of the LHNA's 'Demographic Baseline' modelling [HNE2, the LHNA, Table 8.2].

9. The Plan and HTP misrepresent the LHNA's findings regarding Dwelling Mix because:
- (a) They position outputs from the Demographic Baseline scenario as targets for new homes [TOP3, the HTP, points 6.11, 6.14, 6.16] [SUB2, the ELP, points 8.28, 8.29, 8.31]. This is incorrect; the LHNA explains the requirements for family-sized homes could substantially be met from re-sale of existing stock and there are repeated references recommending existing stock be taken into account - which are ignored by the Council, without explanation [HNE2, the LHNA, points 8.10, 8.21, 9.12, 9.13, C.15, Figure C.2]. In short, outputs of the Demographic Baseline do not directly translate into new build targets, and it is misleading to represent them as such.
 - (b) There appears to be an underlying assumption within the Plan and HTP that the 'Demographic Baseline' scenario reflects the Dwelling Mix needs for the Borough's households as a whole. This is incorrect; the Demographic Baseline represents requirements of 'newly forming' households, and specifically not existing households, who are likely to have different needs [HNE2, the LHNA, Notes for Tables 8.1 and 8.5 and points 8.7, 8.22, 9.11].
 - (c) The LHNA notes limitations of the Demographic Baseline, including there being no guarantee newly forming households could afford larger properties, but this important information is not reflected in the HTP or Plan [HNE2, the LHNA, points 8.4, 8.7, 8.14, 8.15, 8.21, 9.12].
 - (d) Helpfully, the LHNA provides further Dwelling Mix scenarios, which aim to establish a broader estimate of need, beyond newly forming households, and address limitations of the Demographic Baseline. The LHNA refers to these as the '**Aspiration**' and '**Expectation**' scenarios, which try to reflect market signals such as affordability, and the needs of older people [HNE2, the LHNA, points 8.3, 8.8, C.16 and Table C.7]. Outputs from these scenarios shows a significantly reduced need for family-sized homes and increased need for smaller properties [HNE2, the LHNA, Table 8.1] yet these outputs have been ignored in the Plan and HTP, without explanation. Our representations provide further information [01708-6-1, Chapter 8: Policy H3: Housing Mix, points 5 and 6] and [01708-1-1, BHE Response to the Housing Topic Paper, page 4 and points 79-88].
10. The Demographic Baseline does not represent robust and proportionate evidence, as it only reflects the hypothetical needs of one part of the community i.e. newly forming households unincumbered by financial constraints. It does not reflect the needs of the wide range of different groups within the existing community, which, according to the LHNA, have demonstrably different needs e.g. the needs of Concealed households and older households looking to downsize, nor does it reflect the realistic needs of newly forming households e.g. once likely financial constraints are considered.

11. The Strategic Housing Market Assessment 2015 (*the SHMA*), preceded the LHNA [**included in Regulation 19 evidence but not submitted**]. The SHMA did consider size requirements of concealed households and existing stock and recommended 50% of market homes have 3+ bedrooms [SHMA 2015, Page 112, point 11.5.11], significantly less than the 72% underpinning the Plan. Our representation provided further similar comparisons [**01708-1-1, BHE, Response to the Housing Topic Paper, points 84-88**].
12. The dwelling mix requirements of those needing Subsidised Rented Housing have been conflated with Affordable Home Ownership/Shared Ownership tenures, resulting in an incorrect and inflated need for affordable family-sized homes overall, which infects the Plan [**01708-1-1, BHE, Response to the Housing Topic Paper, points 95- 96**].

Not adequately assessed needs of groups in the community

13. Our representations explain the needs of Students, those needing HMO accommodation, and Concealed households were not properly evidenced in the LHNA [**01708-6-1, Chapter 8: Policy H3: Housing Mix, points 21 and 24**] and [**01708-1-1, BHE, Response to the Housing Topic Paper, points 82-94**].
 - (a) The LHNA solely considered students in communal education establishments [**HNE2, the LHNA, point 7.46**] and, as this was a small number, concluded there was no need to consider student households further. This approach does not reflect guidance which says the assessment should consider other types of student accommodation [**ID: 67-004-20190722**].
 - (b) Census 2021 identifies Enfield's adult student population as 4,302 (not living with parents), plus 9,984 living with parents. Student households reported in Census 2021 in London are thought to have been reduced due to pandemic related issues – in 2011 there were 7,697 adult students (not living with their parents). These numbers are significant, especially as most will likely reside in lower-quartile PRS accommodation, which is under pressure [**HNE2, the LHNA, points 24, Table 4.11**]. Despite this, the needs of students have not been addressed, and as a result not appropriately considered.
 - (c) The evidence base is silent in regard to the need for HMO accommodation and as a result no policies have been proposed in the Plan to reflect the needs of this group, or to protect either existing HMOs, or existing family-sized housing from conversion to HMOs [**01708-6-1, Policy H3: Housing Mix, points 10-25**].

- (d) The LHNA does not reflect the needs of Concealed households, which is a very large group in Enfield - Please see our representations [01708-6-1, Policy H3: Housing Mix, points 5, 21 and 24] and [01708-1-1, Response to Housing Topic Paper, page 4 and points 77-88].

Not up-to-date

14. The LHNA does not represent an up-to-date assessment of need.
15. Our representation noted the LHNA is based on out-of-date Census 2011 data, and that the HTP had not considered the implications or importance of more up-to-date information [01708-1-1, BHE Response to the Housing Topic Paper, points 72-78, 86, 92, 94].
16. Important information from Census 2021 not properly accounted for includes:
- (a) Between 2011 and 2021 the number of families classified as 'Concealed' in Enfield increased 60%, the second highest increase in London. The LHNA does not consider the needs of Concealed households, however, the SHMA did, and found 94% required a property with 1 or 2 bedrooms [see 12.3.5].
 - (b) The proportion of families with an adult child living with them rose from 23.2% to 31.9%, making Enfield the second highest ranked area in England and Wales. This upward trend was observed across London (increase from 25% to 27%), but far more pronounced in Enfield.
 - (c) 43.1% of Enfield's dwellings have 1-2 bedrooms, significantly lower than the London average (53.5%) and neighbouring boroughs.
 - (d) There is a notable shortage of smaller homes in the owner occupy tenure e.g. across London 43% of properties owned with a mortgage have 1-2 bedrooms, whilst in Enfield it is just 29%.
 - (e) Enfield's shortage of smaller properties may be connected to the remarkably high underoccupancy rates (75% of owner occupier properties are underoccupied).
 - (f) Enfield's population grew 5.6% between 2011 and 2021, but notable declines of those aged 20-35 and substantial increases of those aged 55+.
17. The problem stems from the age of the LHNA which was published nearly 4-years prior to the submission date and relies on out-of-date data e.g. 2011 Census data [HNE2, the LHNA, e.g. points 4.10, 4.18, Table 4.3 and 6.3] and 2014 MHCLG housing projections [HNE2, the LHNA, e.g. points 7.9, 7.10, Figure C.1]. It is considerably older than housing needs assessments relied upon by other London LPAs at their Regulation 19 stages. This means it does not reflect the

Procedure Guide for Local Plan Examinations, which warns of risks of relying on such out-of-date data [ID: 1.12].

18. Precisely as this Guidance warns, the LHNA has been ‘*overtaken by events*’. For example since its publication the HTP itself reports significant increases in homelessness approaches, major increases to PRS costs, but stagnating housing benefit rates, increases to housing benefit claimants in the PRS and a surge in the demand for social rent homes [TOP3, the HTP, Table 18, Table 17, points 5.19-5.21, 5.27] and [Sub 2, the ELP, points 8.17]. However, whilst the HTP *reports* these changes, it does not then actually consider their impact on the key figures and outputs of the LHNA.

19. In short, Enfield’s Housing Register has doubled (Figure 1), Social Rent relets have reduced from 602 to 450 per year, there has been a substantial increase in PRS households and PRS receiving Housing Benefits (Figure 2), alongside an increase in rental costs (Figure 3). Inputting these up-to-date figures into the LHNA’s affordable housing models [HNE2, the LHNA, pages 99 and 104, Tables 6.1 and 6.3] would double the need of Social Rent homes and reduce the need for affordable to buy/shared ownership to almost zero.

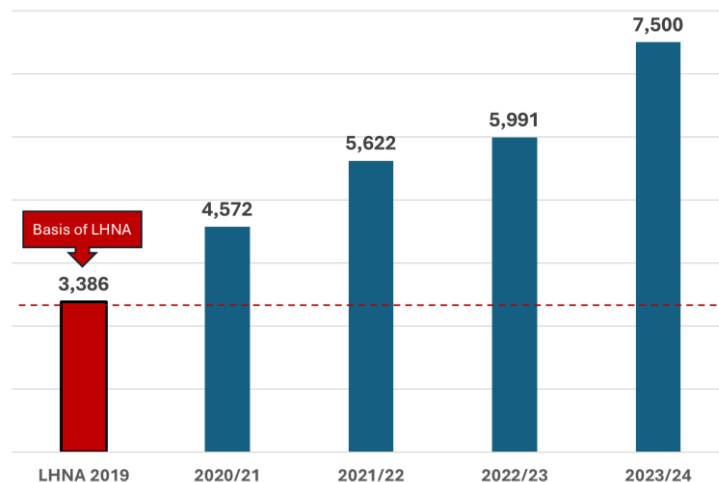


Figure 1 - LBE Housing Waiting List - changes since LHNA calculation. Date Sources: LHNA, MHCLG and LBE

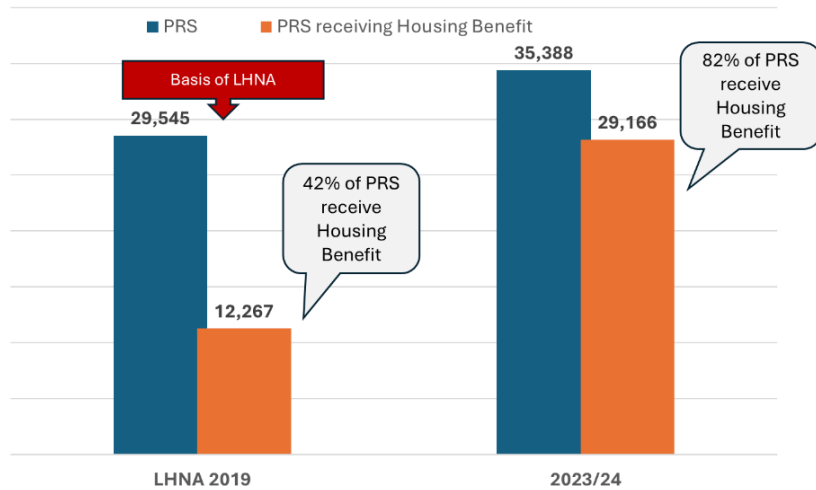


Figure 2 - Changes in PRS and PRS Housing Benefit. Data Sources: LHNA and LBE borough profile 2024

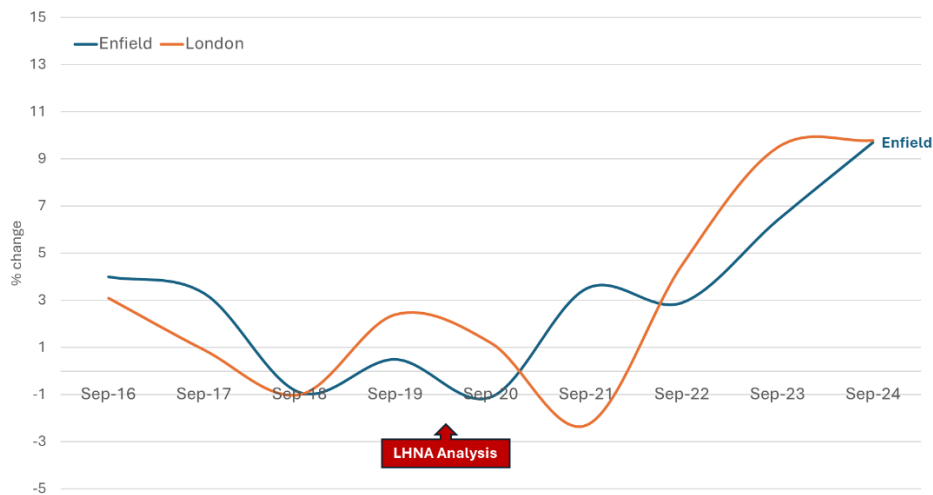


Figure 3 - Annual change in rents in Enfield. Private rental price annual inflation, 2016 to 2024. Source ONS

20. If the LHNA were based on more recent data, it would also show different ‘Dwelling Mix’ requirements e.g. if ONS 2018-based household projections were used, as opposed to the 2014 MHCLG housing projections used in the LHNA [HNE2, the LHNA, p.150 point c.3], it would generate different results due to changes to projected households. Figures 4 and 5 below illustrate the differences between the datasets. Significantly, the consultancy who conducted the LHNA have used the ONS 2018 data since 2021 for assessments.

Change in HRP age groups 2018-2036: Enfield Borough

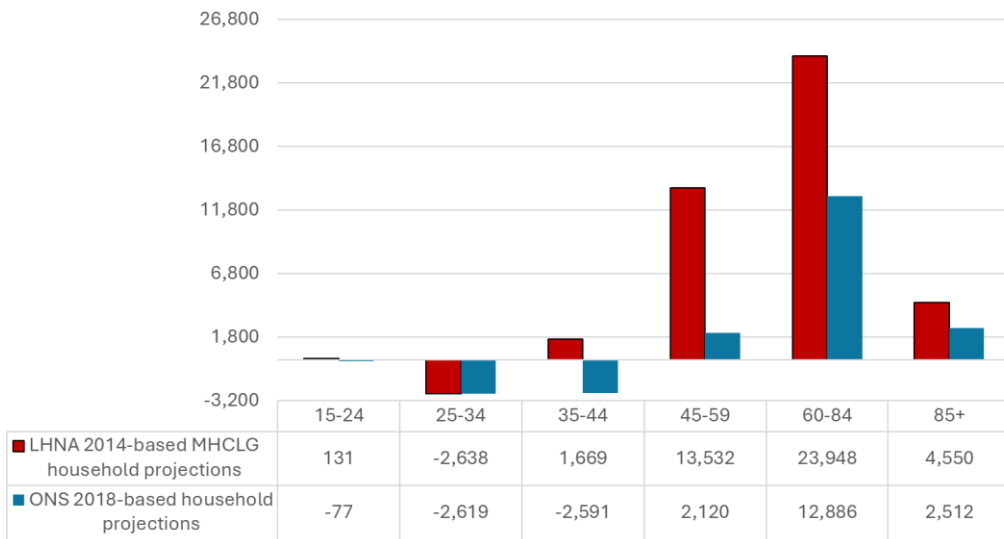


Figure 4 - Impact of using up-to-date data on projections (Age). Source: LHNA 2020 and ONS

Change in household composition 2018-2036: Enfield Borough

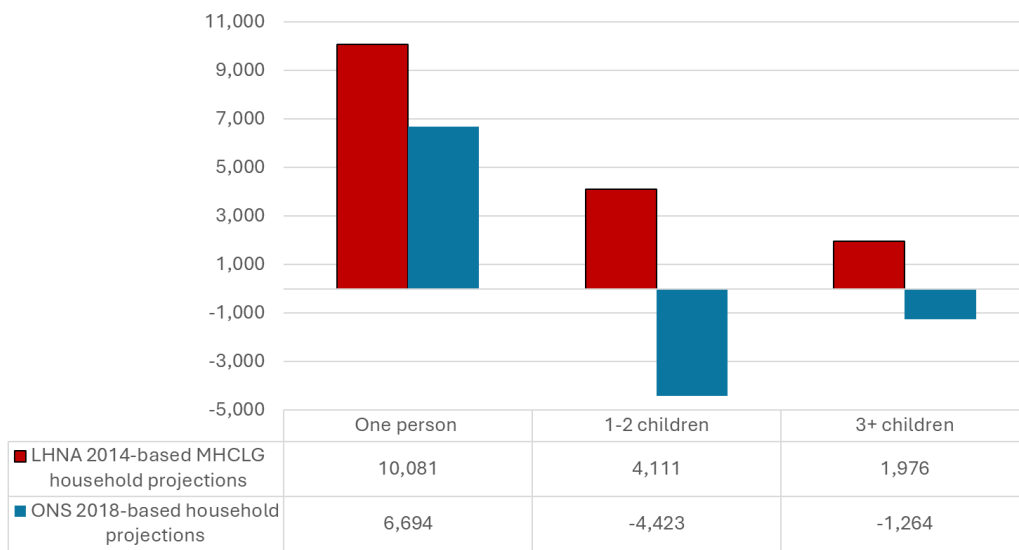


Figure 5 - Impact of using up-to-date data on projections (HH Composition). Source: LHNA 2020 and ONS

21. In short, the LHNA is materially out-of-date i.e. changes since its publication are substantial and meaningful, such that if up-to-date information were used it would generate significantly different outputs.
22. We are impacted by this, as it has resulted in a Plan that is unlikely to deliver the quantum and type of sustainable homes needed by existing and future communities.

Policy, Guidance, Modifications

23. **NPPF Paragraph 31** is not met because evidence underpinning the Plan is materially out-of-date. Furthermore, the interpretation of evidence does not, without explanation, take into account relevant market signals e.g. the LHNA's Expectation and Aspiration scenarios, or up-to-date information including the Census 2021, or changes to the Housing Register and PRS.
24. **NPPF Paragraphs 60 and 63** are not met because the scale of need for smaller homes has not been accurately reflected in policies and the needs of different groups in the community not properly assessed and therefore addressed, including the needs of Existing households, Older households looking to downsize, Concealed households, Students, those requiring HMO accommodation and Private renters receiving housing benefit.
25. **NPPF Paragraph 35** is not met because evidence of housing need is out-of-date, has been misrepresented, and does not reflect the needs of different groups. As a result, the Plan's strategy is not based on proportionate evidence and is therefore not 'Justified' nor Consistent with national policy (NPPF 31, 60, 63 and 35). The Plan is therefore not 'sound'.
26. The PPG for **Housing and economic needs assessment [ID: 2a-023-20190220]** has not been followed as current stocks of houses of different sizes were not considered when setting dwelling mix/house size targets, resulting in a substantial overestimation of the proportion of family-sized homes needed, particularly in the market tenure.
27. The PPG for **Housing needs of different groups [ID: 67-001-20190722]** has not been followed as dwelling mix targets are based on 'newly forming' households and not the needs of all households including Existing households. Furthermore, the needs of Concealed households, Students, Older households looking to downsize and those needing HMO accommodation were not properly assessed. **ID: 67-004-20190722** requires policy-makers to consider the needs of students living outside communal halls of residence but this was not followed.
28. The PPG for **Housing for older and disabled people, [ID: 63-001-20190626]** has only been partially followed as needs for downsizing to single-level and smaller more manageable homes were ignored, without explanation, despite being reported in the LHNA.
29. The Inspector's preliminary matters and questions asked the Council whether the LHNA constitutes an up-to-date assessment of need **[IN1, Preliminary Matters & Questions, PQ20]**. The Council's response said '*There is no definition describing whether evidence is up to date in*

national policy or guidance’ [E3, Council’s further response to Preliminary Questions, page 12, point 63]. However, helpfully, the **Procedure Guide for Examinations**, provides some clarity, which the authority should have considered.

‘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’ [**Procedure Guide for Examinations, paragraph 1.12**]

30. The LHNA does not reflect this guidance by a considerable margin as (a) it does relate to needs from more than two years before the submission date, (b) it does rely on data that is far older, which has been *‘overtaken by events’* and, (c) it has not been updated as necessary to incorporate the most recent available information. The Introduction to this Guidance says *‘in the interests of consistency, efficiency and fairness, all parties should follow its general principles’* [**Procedure Guide for Examinations, Introduction, paragraph 2**].
31. The Planning Advisory Service’s advice note, **Evidence for Plan Making** says, *‘Evidence should be as recent as possible ...’* and that *‘As a rule of thumb, evidence should normally be no older, and preferably newer, than two years preceding the submission of a plan for Examination.’* The LHNA does not reflect this PAS advice by a considerable margin.
32. These issues have infected the Plan, and would result in a mix of homes disconnected from genuine local needs, fewer affordable homes delivered, less housing delivered overall, and increased viability/deliverability challenges. The current approach is therefore unsound.
33. To become ‘sound’, the LHNA needs to be updated, taking into account up-to-date market signals and population information, as well as the profile of the Borough’s existing housing stock, and the needs of different groups which are currently not properly identified, which include (but not limited to) Existing households, Private renters claiming housing benefit, those needing Social Rented affordable housing, Older households – including those looking to downsize, Concealed households, Students, Young families with children, and those requiring HMO accommodation. The results of the updated LHNA will need to be reflected in modifications to the Plan as necessary.

Q2.16: Does the Plan make adequate provision for the needs of other groups in the community, including but not limited to older people?

34. No. We feel our answer to Q2.15 also addresses this question.

Word Count: 2,976