

Comments on Draft Local Plan by Michael Clary

I have seen the comments submitted by the Enfield Society and Southgate District Civic Voice on the draft Local Plan and broadly agree with their thrust.

The consultation process

If I may make a general point first, it is hard for residents to comment on the consultation as a whole because it is presented in the form of a large number of documents with no guidance on how they relate to each other or on which are principally technical papers and which are statements of proposed policy.

I am used to dealing with complex topics and if I find the papers and the process impenetrable, so probably will many others many others. A consultation presented in such a ragbag fashion is a poor consultation, likely to attract comments only from the truly committed rather than more typical residents.

Housing need and targets

As a former government statistician I would like to comment on the issues of household projections, their use by central government in setting local authorities targets for housebuilding and the impact this has on the draft Local Plan.

ONS's population and household projections are not forecasts. They are mechanistic projections of trends in recent years of the various components that make up demographic change. ONS say explicitly that they **do not take into account policy changes** (such as investing more in the North) or events such as **Brexit or the totally unexpected Covid pandemic**. Of course the impacts of Brexit and Covid can only be speculated upon at this stage but it seems quite plausible that the post-Covid world will see **less commuting, reduce the need to live near your office work, invoke a desire to live in less densely populated areas** with less importance attached to urban transport hubs.

The main point though is that these events have **heightened the uncertainty around future demographic trends**.

I am not suggesting that the household projections are badly done. The issue is that they are incapable of bearing much of the weight placed upon them, notably by central government in setting housebuilding targets (see below). They should be seen as a valuable starting point for grown up discussion, not the source form which targets are dictated.

To be fair, the uncertain nature of the projections is recognised in some of the more technical Local Plan documents but it is conspicuous by its absence from the headline statements, where these can be found, or from Councillor Caliskan's "Future Enfield: Enfield homes for Enfield people" leaflet distributed to households a few weeks ago.

However, the discussion of future housing need in the documents is very heavily influenced by the housing targets set by central government and the GLA. The demographic contribution to the future need is of course related to the uncertain household projections discussed above. A large chunk of the targets which government has been trying to set is due to central government's use of formulae which place great stress on affordability, essentially based on average house prices in an area with

average wages of those working in the area, wherever they live. Affordability of rental accommodation is ignored; of course there is a relationship with house prices but it is not a simple one.

This culminates in the statement in Councillor Caliskan's leaflet that **the government would like us to build 4,397 homes per year**. This appears to be taken from central government calculations consistent with what was probably the most mutant of their formulae in December 2020. However, they dropped this formula in April 2021. The figure of 4,397 was dead in the water at this point and **should not have been used in any documents prepared after this point**, including Councillor Caliskan's leaflet. Some might think that the purpose of using the figure make anything significantly less seem like a good result or compromise for the borough.

It is worth noting that the various formulae proposed by central government over the last eighteen months come up with strikingly different results for Enfield. The set of household projections chosen also make a substantial difference. The government announced that it wished to stick with mid-2014 projections rather than mid-2018 in the interests of stability, which suggests an inherently unstable formula.

As I am writing this, seemingly well-informed newspaper reports have indicated that the **government's policy of setting housebuilding targets for local authorities is in the process of being dropped** altogether. While it would be naïve to suppose that central government will just leave it up to local authorities, it does mean that right now nobody has any real idea what will replace targets.

I am aware that ultimately it is the GLA that sets targets for London boroughs, not central government but presumably this is based on some Londonwide target agreed with (or imposed by) central government – but is this London target also to be dropped? Household projections are of course an important input into the GLA's allocation of housing need across boroughs, so similar caveats should be placed on their use.

None of this is to deny that Enfield has housing needs for its existing population but it is unclear how some of the developments proposed will tackle poor housing conditions or shortage of rental accommodation rather than, say, attract new buyers into the area. "Enfield homes for Enfield people" may be the strapline but it is unclear to me how this can be (or even if it should be) arranged.

To summarise, we have unusually uncertain household projections, a central government target regime (at least for now) which applies arbitrary and unstable formulae to these uncertain projections and a GLA target regime which may or may not be affected by the dropping of central government targets.

This means that it is probably the **worst time possible to be committing to plans for the next twenty years**. There is a real danger that Green Belt is given up or unsuitable tower blocks built because it is assumed that the projected growth is bound to happen. If it doesn't, we have ruined parts of our borough for nothing.

It is vital that **council planning is nimble and is able to react quickly if the demographic outlook changes**. This will be impossible if large scale permissions for the more destructive developments

(often more attractive to developers than brownfield) are front loaded near the start of the planning period.

In this context it is noted that it is only a few years since Enfield proposed a new primary school on part of the Grovelands estate, based largely on population projections which showed continuing growth in demand. While it was being argued, the birth rate dropped and the extra demand melted away; the council now says there is a surplus of places. The new school would have been an expensive addition to that surplus. We need to avoid making the same mistake on housing.