

Your reference: CSL338/KRS

**16 December 2024**

Local Plans Team  
Planning Policy Team  
London Borough of Harrow  
Forward Drive  
Harrow  
HA3 8FL

Dear Sir or Madam,

**BARWOOD LAND  
LAND AT HEADSTONE LANE, HARROW**

**REGULATION 19 CONSULTATION RESPONSE TO NEW LOCAL PLAN**

I write on behalf of my client, Barwood Land, to submit representations to the London Borough of Harrow's New Local Plan, Regulation 19 consultation. A completed consultation form is enclosed with this letter.

A response to the Regulation 18 consultation was submitted in April of this year, together with the submission of land at Headstone Lane, Harrow to form part of the Call-for-Sites. Barwood Land is the land promoter of the site and has had initial discussions about the potential for future development with the Council. For ease of reference the following additional information in relation to this site:

- Completed Consultation Form
- Concept Masterplan April 2024

These representations focus on the site being dismissed as a proposed Allocation in the Regulation 19 version of the Plan coming forward. We request that this is reconsidered and included as an identified site for development in the next plan period.

Set out below is a description of the proposal, site and context including the previous land use, together with additional details of a proposed residential development.

**The Proposal**

The site has a total area of approximately 8.5 hectares, with the current concept masterplan seeking to develop less than half the total site for residential development (3.74 hectares), delivering up to 150 new (mostly) family dwellings at an average 40 dph.



## **The Site and Surroundings.**

This previously developed 8.5 ha site is enclosed on 3 sides by existing development and is currently unused and vacant land. It is located between residential properties on Headstone Lane, Harrow to the east, and the edge of Pinner Memorial Park to the western boundary. To the north is the Blue Room Venue and Conference Centre, and to the South is Pinner Park Primary School.

The site is sustainably located approximately 200 metres at the closest point to Headstone Lane Train Station, providing direct access into Central London. Buses also run frequently along Headstone Lane.

When assessing transport connectivity in London, the site is in Public Transport Accessibility Level (PTAL2). PTAL is a measure of connectivity by public transport. Which has been used by various planning processes in London for many years. PTAL suggests how well the place is connected to public transport services. It does not cover trips by car.

The site was historically used as private sports pitches but has been vacant for over 10 years. The site is currently inaccessible to the public and can be defined as previously developed, and now needs to be brought back into effective use in accordance with NPPF Chapter 11 – making effective use of land.

## **Planning History**

A planning application was refused in 2013 on part of the site (ref: P/0304/13). This application provides useful information on the previous sporting use of the site. The application was for the change of use of 2.2 ha of land at the site to a touring caravan and camping site comprising of 75 pitches. The application was considered by the Council's Planning Committee on 29 May 2013. It was highlighted that anecdotal evidence suggested that sport users of the site at the time of determination had been displaced. Due to the time that has now lapsed, it is considered that the site is 'abandoned' and currently has not lawful use. There is no other relevant planning history on the site.

## **Site Planning Status**

The site is currently designated in the Green Belt in the adopted Local Plan with no other designations. We understand that the Green Belt Assessment forming the basis of the designation is not available for review.

The site has not been identified for the provision of sports in the Council's recently adopted Indoor and outdoor Sports Facilities Strategy 2023 – 2037 for sports pitches (April 2024).

## **The Proposal**

The enclosed Vision Document for the site, prepared by Barwood Land, proposes a residentially led scheme, accessed from Headstone Lane. A generous greenspace has been provided as a buffer with Pinner Memorial Park. The greenspace has the potential to incorporate formal and informal play facilities, accessible to the public.

The Proposed Development would deliver much needed family housing to the London Borough of Harrow. It is envisaged that the scheme would deliver 50% affordable housing, with a focus on developing family housing across the site. Whilst this is policy compliant, we understand that Harrow currently secured on average 23% affordable housing on major residential schemes and currently has a critical need for affordable housing in the Borough to meet current needs. This site provides an excellent opportunity to meet the identified needs of the most vulnerable residents in the Borough.

The site is already visually shielded from the wider Pinner Memorial Park, via a bank of trees and mature vegetation. The proposed layout of the site with open green space to the west, is therefore unlikely to impact on the openness of the Greenbelt designation from any public viewpoint.



The scheme development is in the early stages and further discussions on the potential of the site needs to be held with the Council.

## **Representations to the Regulation 19 Version**

These representations focus on the reconsideration of the Land at Headstone Way as a residential allocation in the emerging Local Plan. We note that allocation of the site has been discounted solely on the basis that it is in the Green Belt with no further consideration of the benefits the site or the future delivery issues of other sites in the Borough.

### Local Housing Need

The Council latest Annual Monitoring Report (AMR) relates to 202/21, and is therefore over 2 years out-of-date, albeit information on housing completions is provided in the London Plan Annual Monitoring Report (March 2024). The Council's emerging Local Plan does not provide an up-to-date Housing Land Supply position based on the new allocated. We consider that this approach is not Sound and should be addressed.

The Local Housing Need (LHN) requirement of 3,801 dwellings over the 5-year period is set by the London Plan, which equates to 760 dwellings per year. On current evidence, it makes it difficult to calculate the current status of Housing Land Supply. Based on the Council AMR, the Borough can demonstrate a 6.47-year supply of housing against the relevant requirement, with a 5% buffer added.

The Council's AMR provides a list of development sites that are included within its housing supply trajectory over the 5-year period. We have reviewed the individual sites referred to in the housing trajectory to assess if they comply with the NPPF definition of a deliverable site. Where sites are not considered to be deliverable, we have deducted them from the trajectory to give a revised HLS figure. This amounts to 1,561 dwellings, reducing the Housing Land Supply to 4.52 years. This does not account for the additional allocations made in the current consultation document.

We have also reviewed the latest Housing Delivery Test (HDT) results and potential future trends of the supply of homes in the Borough, i.e. if delivery is likely to improve or worsen. The London Plan Annual Monitoring Report 19 2021/22 dated March 2024, provides details on the housing completions in Harrow 2017/18 to 2021/22, showing a 5-year average of 849 dwellings, which is above the required 760 dwellings. Notwithstanding this, the latest figures show a significant decline in delivery as set out in Table 2.1.24 of the Report and summarised below:

- 2017/18 – 770 dwellings
- 2019/20 – 1,238 dwellings
- 2020/21 – 1,400 dwellings
- 2021/22 – 199 dwellings
- 2021/22 – 637 dwellings

Based on the latest data, and market predictions that this declining trend is likely to be maintained, the emerging Local Plan needs to carefully consider the deliverability of all sites included in its existing HLS, together with the sites put forward.

The Headstone Lane site provides an excellent opportunity for a deliverable brownfield site in a sustainably located position with excellent access to green space and schools amongst other amenities and should be considered on this basis.



## Delivery of Family Affordable Housing

The Council has a critical shortfall of affordable housing in Harrow, with a focus on family accommodation. There is also a shortfall of accessible recreational open greenspace. Barwood Land will commit to the delivery of 50% affordable housing on the Headstone Lane site, providing an excellent opportunity to deliver fit-for-purpose family accommodation for the most vulnerable residents of the Borough, with direct access to usable green space. This should be a key consideration when determining appropriate allocations in the emerging Local Plan.

## Green Belt Designation

The site is in the designated Green Belt, which is the key consideration in dismissing the site for allocation. It is our understand that the Council does not hold a copy of the original Green Belt Assessment carried out in the 1980's and therefore has not knowledge of the basis the site forms part of the designation.

We consider that the site does not meet the five key purposes of the Green Belt, which remain in the recently published version of the National Planning Policy Framework, namely:

- A. To check the unrestricted sprawl of large built-up areas;
- B. To prevent neighbouring towns merging into one another;
- C. To assist in safeguarding the countryside from encroachment;
- D. To preserve the setting and special character of historic towns; and
- E. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is clear from the latest trends in housing completions and market predictions that Harrow is likely to fall significantly below its HLS within a couple of years, and certainly within the next plan period on which the Local Plan being prepared.

Based on HLS, the lack of understanding of its Green Belt designation and the critical need to deliver affordable family accommodation, we request that the Council consider the land at Headstone Lane for allocation.

We trust the comments above are clear. However, please contact me if you have any questions.

Yours sincerely

