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CHARTERED TOWN PLANNERS

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Planning Policy Team
London Borough of Harrow Council
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Our ref: 3979

13 December 2024

Dear Planning Policy Team,

Consultation on Proposed Submission (Regulation 19) version of Harrow's New Local Plan 2021 – 2041

We write on behalf of Old Millhillians Club Land and Investments Limited (the 'client'), to provide our comments on the published Proposed Submission (Regulation 19) version of Harrow's New Local Plan 2021 – 2041.

Paragraph 69 of the National Planning Policy Framework (2024) ('NPPF') requires that local planning authorities have a clear understanding of land available in their area and identify a sufficient supply and mix of sites. It requires planning polices to identify a supply of specific and deliverable sites.

We understand the London Borough of Harrow Council ('the Council') is seeking to identify sufficient housing sites across the borough to meet housing need and provide a sustainable five-year housing land supply. The Proposed Submission (Regulation 19) version of Harrow's New Local Plan 2021 – 2041 (the 'Plan') proposes new housing and employment sites for allocation to meet an identified need.

The Council is seeking views on whether the Plan is legally compliant and meets the test of 'soundness' set out in the NPPF. We therefore provide our comments below. Given we are promoting our client's site for the delivery of specialist older people housing, our comments focus on the Council's proposed strategy for supplying sufficient homes of this type.



We note that our client's site has been considered in the Council's 'Site selection / allocation methodology' (4 November 2024) document which forms part of the Regulation 19 Plan's evidence base. Our client's site has been assessed as three separate land parcels, named as follows:

- Old Millhillians Sports Ground and Adjoining Lane
- Harrow Garden Centre
- Land at Headstone Lane

Notwithstanding the above, the site *should* be assessed as a single entity, and we will continue to refer to the site in singular terminology throughout this letter.

Response to Proposed Spatial Strategy and Specialist Older Person Housing Requirements

1. The Plan seeks to deliver sufficient new specialist older people homes to meet the statutory requirement for Harrow's Local Plan to be in general conformity with the London Plan (2021).

Draft Strategic Policy 03: Meeting Harrow's Housing Needs 'part c' states that the housing needs of older people will be met through the following measures:

- i. "Prioritising the delivery of new conventional residential accommodation in C3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.*
- ii. The delivery of specialist older persons accommodation (C3) with different levels of support, and care home accommodation (C2). These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time.*
- iii. The delivery of low-cost rented housing within older person accommodation schemes".*

The Council set out in Draft Strategic Policy 03 'part b' that they will 'work positively' with specialist providers to support the delivery of a minimum of 980 units between 2022 – 2032 and a total of 200 bed spaces for nursing care. Chapter 11 of the Plan provides a list of draft allocations. Of the sites put forward, just two sites are proposed for allocation for specialist older people housing. These sites and their indicative residential capacity are set out below:

- 014: Vernon Lodge – 56 units
- 018: Wolstenholme – 25 units



In our view, a total planned capacity of 81 specialist older people units against a strategic target of 980 units is insufficient and will result in an under-supply of this type of housing. We also consider the delivery of 98 units per year over the period 2021-2031 (a total of 980) is inadequate and is reliant on an expectation that demand for older person housing may fall after 2029. We strongly believe that this figure should increase to accord with London Plan (2021) Policy H13 which sets the Borough an annual benchmark target to provide 165 units per annum (or total of 3,000) of accommodation for older people between 2017-29 (12 years).

The Plan, as drafted, does not appear to offer any clear mechanism for the Council to monitor the delivery of older person homes through either conversion and/or adaptation of existing Class C3 units and it is not apparent what providers would deliver such accommodation. Additional sustainable sites need to be allocated in the Plan to deliver specialist older people accommodation within 5 years, and we strongly recommend that our client's site is eminently suitable and should be allocated to meet the significant and real need for this type of housing in Harrow.

We have reviewed the relevant parts of the 'London Borough of Harrow Council Local Plan Integrated Impact Assessment Appendix C: Summary of Policy Alternatives' ('SPA') prepared by SLR Consulting (28 October 2024) that forms part of the Regulation 19 evidence base. We note that this assessment identifies three reasonable alternatives to Draft Policy HO6: Accommodation for older people and excludes each of these.

We note that '*Alternative 2: Support proposals within/edge of town centres (excluding neighbourhood centres)*' is discounted in the assessment because, '*some town centres have a low public transport accessibility rating score*' and as such, '*there is a potential risk this option may result in poor access to public transport and result in social isolation for older people*'.

The implication of discounting 'Alternative 2' is that sites that may have relatively low PTAL ratings are discounted despite their overall excellent access to the public transport network. For example, while our client's site has a PTAL rating of 2/3, it generally has excellent access to the public transport network, as we demonstrate later in this submission.

We highlight that the PTAL rating is only one measure of accessibility, and TfL's WebCAT includes another method of measuring transport connectivity: namely, Time Mapping analysis (TIM). TIM indicates the extent that a person can travel from a site in various time bands using public transport. The TIM map for



our client's site is shown in **Figure 1** below and indicates that a significant part of Central London can be accessed from the site within 60 minutes. Harrow Town Centre can be accessed within 15-30 minutes. This is predominantly due to the site's proximity to Headstone Lane railway station which lies approximately 0.1 miles to the north.

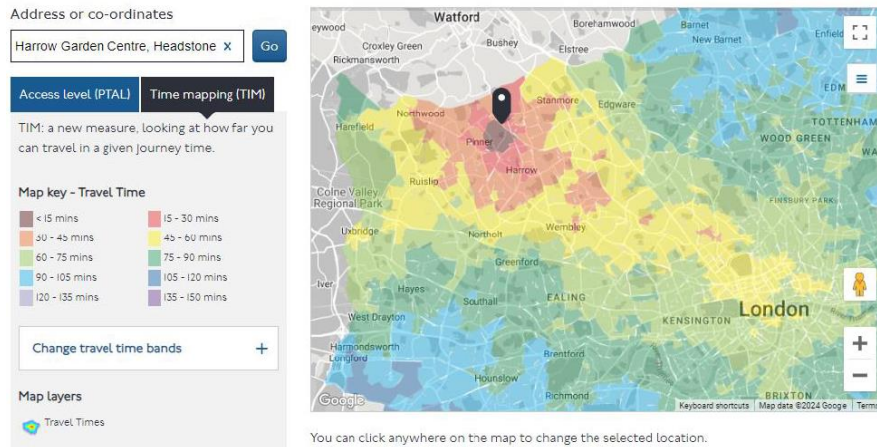


Figure 1: WebCAT Time Mapping Analysis

The Council's proposed strategic approach to specialist older person housing delivery does not take account of the above and, therefore, the opportunity to deliver additional specialist older people housing on suitable, available and deliverable sites will not be utilised.

A further shortcoming of both the Plan and SLR's assessment is discounting 'Alternative 3: Include a higher target to provide 165 units/total of 1,980 of accommodation for older people between 2017-29 (12 years) or 2,300 units over a 15-year period'.

The reason given for discounting 'Alternative 3' is that 'the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information'. However, this assertion directly contradicts the findings of several documents in the evidence base as discussed below.

The Harrow Local Housing Needs Assessment ('HLHNA') 2024 prepared by Opinion Research Services (February 2024) sets out in paragraph 26 that the older population will continue to grow until 2035, and Harrow will therefore need to provide a total of 1,980 units for older people to 2029 and 3,300 units to 2041 e.g. the end of the Harrow plan period. These totals are based on the 165 units of the London Plan benchmarks to 2029 (paragraph 27) and the HLHNA states that Harrow would be following the precedent set by other London boroughs (paragraph 28).



'Figure 13' in the HLHNA also projects significant increases in the age of households in Harrow between 2021 and 2041 with the number of people aged 75-84 is expected to rise by 5,400 in over this period and people aged 85+ to rise by 3,000. The Council's expectation that older people population growth shall reduce after 2029 fails to take any account of compelling data to the contrary.

The population projections set out in the HLHNA are further corroborated in the evidence base document entitled; '*An assessment of housing needs of older people and adults with care/support needs prepared by Housing Lin*' (December 2022). In Table 1 of this document, it sets out that the household population for people aged 65+ will rise nationally by 2,242,124 based on ONS 2018-based projects. This represents a 21 % increase which generally accords with the national expected increase for the same period.

It seems certain that the demand for specialist older people housing will increase exponentially in Harrow over the coming years and this demand needs to be met with an adequate and planned supply of sites to deliver against this need. Despite the pressing and urgent need for older people housing, the Council have chosen to plan for a supply that is restricted solely to town centre locations and is largely reliant, save for two draft allocations, on the conversion and/or adaptation of existing and new Class C3 units.

Whilst not forming part of the Regulation 19 evidence base, we highlight a recent independent report for the Ministry of Housing, Communities and Local Government and Department of Health and Social Care entitled; '*Our Future Homes: Housing that promotes wellbeing and community for an ageing population*' which was published on 26 November 2024 and is considered relevant to our representations.

The report sets out that national and local planning policy should ensure there is (our emphasis) (...):

*"(...) a proper assessment and response to levels of need, that **there is sufficient site allocation for all forms of OPH/LLH** and that local planning authorities (LPAs) make better and more timely choices in planning applications for OPH/LLH. This shift should be underpinned by consistent use of shared definitions, policies, and requirements through the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) and adopted locally in the Local Plan".*

The allocation of just two unsuitable sites for older person housing ignores the urgency across to the UK to reverse the trend of shortfalls in supply. We note that the above referred to LIN report concludes that:



“Harrow would be following the precedent set by other boroughs by setting a target of 165 units a year as specified in the London Plan. Other boroughs have combined using the London Plan figures but have a policy to review the need and delivery over time”.

Therefore, we believe clarification and justification should be provided as to why the target for older person housing has been reduced in the Regulation 19 version of the New Harrow Local Plan (2021-2041).

2. The specialist older person housing requirement should not be fulfilled solely within areas with high accessibility to public transport ratings (PTAL 3-6).

Draft Policy HO6 (Accommodation for older people) states that, *“Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where: it is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers”.* We do not consider this to approach be legally compliant.

A significant portion of the borough is within areas with low PTAL ratings (PTAL 1a-3) as demonstrated at **Figure 2** below. As a result, Draft Policy HO6 needlessly excludes vast areas of the borough from being able to provide specialist older people housing.

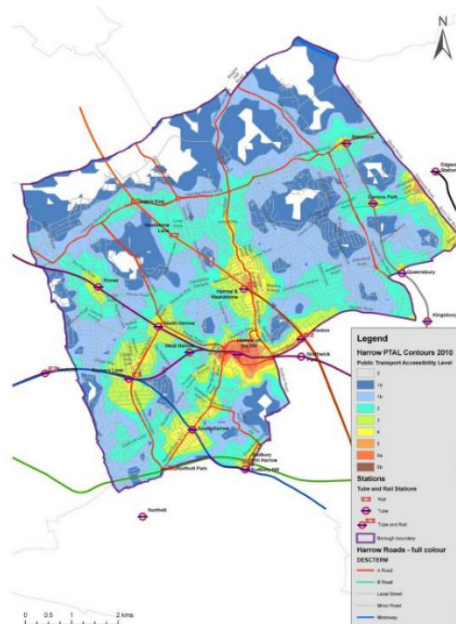


Figure 2: PTAL Rating Across Harrow



We consider that Draft Policy HO6 should be amended to support proposals within edge of town centres and neighbourhood centre locations. This approach would allow for the consideration of sites that have low PTAL ratings but are in real terms highly accessible (as referred to above and below). These sites will be able to support older residents as well as having access to local services and facilities and would not become isolated from friends, families or experience difficulties accessing essential services like health care.

In short, we recommend that the relevant part of Draft Policy HO6 be amended to read:

“Proposals for specialist C3 and non-C3 older people’s residential accommodation such as care homes and extra care facilities will only be suitable where: it is easily accessible to public transport (~~PTAL 3-6~~), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers”.

Review of Draft Allocations for Specialist Older Person Housing

As aforementioned, the Plan includes just two draft site allocations for the development of specialist older people accommodation. We review these sites in turn below, and conclude that both sites are unsuitable, unavailable and undeliverable.

- ***O14: Vernon Lodge***

The draft allocation of Vernon Lodge indicates a total residential capacity of 56 specialist older person units. The development time frame is given as 1 – 5 years. In our view this site is unsuitable, unavailable and undeliverable.

The Council recognises that Vernon Lodge has the second to lowest PTAL rating (1b) and, as a result, the allocation of Vernon Lodge conflicts with Draft Policy HO6 which seeks to deliver specialist housing in PTAL 3-6 areas. The low PTAL rating of Vernon Lodge is expected given the nearest train station (Harrow and Wealdstone) is some 1.2 miles or a 30-minute walk from the site to the south which is entirely unsuitable for older person housing.

It is understood that Vernon Lodge was formerly a care home in the 1970s but more recently it has been used as a hostel. Vernon Lodge is currently vacant, however, in accordance with Draft Policy HO10:



“Housing with shared facilities (Housing in Multiple Occupation), the loss of the existing use would need to demonstrate that either there is no local need for the type of accommodation, that the proposal was for a replacement provision at an equivalent or better standard, the use is inviable or unsuitable and the replacement provision is addressing a more acute local need.”

We note that a planning application was submitted in November 2018 for, *“Redevelopment to provide two blocks ranging between one to four storeys to create 300 bed temporary housing facility with management offices (Sui Generis); Parking; Landscaping; Refuse and Cycle Storage”* (Ref: P/4895/18).

The application was withdrawn by the applicant in 2019. It is not clear why the applicant withdrew the application; however, we note a significant number of objections to the planning application from local residents. Most of the objections related to the scale of development within a suburban character area. Therefore, we surmise that the Council indicated to the applicant that they were going to refuse planning permission. No further planning applications have been made in the 5 years since.

We note that the Council have recently resolved to dispose of the site. A report for Cabinet dated 15 February 2024 recommending the sale of the freehold interest at Vernon Lodge states that:

“The property is vacant and has been identified as being surplus to the Council’s service needs. The costs of bringing the property back into use is significant. It is no longer economically viable and there is no alternative use identified at a lesser cost”.

A total of five options were considered with, ‘Option 5: Dispose on the open market’ chosen. Vernon Lodge was subsequently marketed by Savills in March 2024. It is not known whether a purchaser has since acquired the site.

It is noted that Vernon Lodge is given an overall score of 19% in the ‘Site selection / allocation methodology’ (4 November 2024). This is second to lowest score out of the allocated sites save for draft allocation ‘018 Wolstenholme’ which is also allocated to deliver specialist older people housing. It is clear that the delivery of this type of housing needs greater consideration by the Council.

The allocation of Vernon Lodge is unsuitable. The low PTAL rating conflicts with Draft Policy HO6, there is no current owner to deliver a scheme and given the significant local opposition to the 2018 application



the prospects of achieving planning permission for the full quantum of indicative residential units is considered low.

- **018: Wolstenholme**

The draft allocation of the Wolstenholme site indicates a residential capacity of 25 specialist older person units. The development timeframe is given as 11 – 15 years. The site was also allocated in the Harrow Site Allocations Local Plan (2013). In our view this site is unsuitable, unavailable and undeliverable.

As with the Vernon Lodge site, Wolstenholme has almost the lowest PTAL rating (1b) and as a result, the allocation of this site conflicts with the Draft Policy HO6 which seeks to deliver such housing in PTAL 3-6 areas.

The site currently comprises sheltered accommodation and it is not vacant. In accordance with Draft Policy H07: Supported and Sheltered Housing, the loss of the existing use would be resisted by the Council unless:

- i. *“adequate replacement accommodation of the same quality and quantity;*
- ii. *will be provided for the particular group; or*
- iii. *it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and*
- iv. *it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard”.*

This policy creates a significant barrier to the site coming forward for specialist older people housing.

We note that a planning application was submitted in January 2018 for the redevelopment of the site to provide 2 x 3 storey buildings (one with a lower ground level) comprising of 57 extra care home flats and 2 general needs wheelchair flats (Use Class C3) including communal lounge and ancillary offices; cycle, refuse and electronic buggy stores; 16 car parking spaces (demolition of existing buildings) (Ref: P/5758/17). This planning permission was not implemented and has now lapsed. No further planning applications have been made in the 6 years since.



adopted Policies Map (2013) but arguably in an area which would have minimal adverse local community impact and no loss of sporting facilities if allocated to fulfil this important need for older person residences.

Moving east to west, the site comprises a garden centre and timber yard, sports pitches and club houses and agricultural fields. The Site is bound to the north by existing mature woodland and a railway line, to the east by another sports field and garden centre beyond and to the south and west by open farmland. The topography of the Site appears relatively flat and is largely undeveloped. Vehicular access is currently taken from a single priority bridleway off Headstone Lane but we refer you to Appendix 1 to our Regulation 18 submission (Site Access Feasibility Note) which sets out in detail essential improvements for access.

A review of the Environment Agency Flood Map for Planning confirms that the site is located within Flood Zone 1. This equates to a 1:1000 probability of flooding in any given year and is the lowest risk zone.

The site is not located within a Conservation Area or Area of Outstanding Natural Beauty (AONB). There are no Tree Preservation Orders ('TPOs') or other environmental designations. The Site is not constrained by any designated heritage assets.

The site is in an inherently sustainable location, with good access to public transport services being located within easy walking distance from Headstone Lane Railway Station (Overground serving Euston and Watford and the Bakerloo line) and a range of bus services (H12, H14, H18 and H19). It is also within walking distance of a range of shops, Headstone Lane Medical Centre, three restaurants and other services. The Site has a Public Transport Accessibility Level "PTAL" rating of 2/3 but supermarkets such as Lidl and Waitrose are a 6 minutes' drive to Harrow and Sainsbury and Morrisons are a 9 minute drive to Pinner. In any event, our client envisages that a specialist provider of retirement villages would ensure that relevant services and leisure facilities would be an integral part of any development.

In terms of the wider context, the surrounding land uses are a mixture of existing residential and commercial uses and agricultural land. It forms part of a slight anomaly in terms of Green Belt designation in that it is part of an area of land surrounded by built development.

Given the above, our client's site would be completely appropriate for specialist older people housing development and should be considered as an additional allocation.



Conclusion

We support the inclusion of the Land at Headstone Lane as an additional site allocation in the emerging Local Plan.

As demonstrated above, the Proposed Submission (Regulation 19) version of Harrow's New Local Plan 2021–2041 does not plan for sufficient sites to supply specialist older person housing against an identified need.

The Plan includes just two draft allocations for specialist older people housing sites, with a total capacity for 81 units, against a strategic target of delivering 980 units over the plan period. As we have demonstrated, neither of these sites is suitable, available, or deliverable. The Council will fail to deliver the required number of homes for older persons.

As such, in conflict with paragraph 36 of the NPPF (2024), the Plan as drafted is not 'sound' as it has not been positively prepared. The Plan also fails to accord with London Plan (2021) Policy H13, which sets the Borough an annual benchmark target to provide 165 units per annum (a total of 3,000) of accommodation for older people between 2017 and 2029 (12 years).

We look forward to your confirmation of receipt of this letter. If you require any information or clarification, please contact me using the contact details provided below.

Yours faithfully,

BELL CORNWELL LLP



Alex Yearsley
Principal Planner

