

9 October 2020



F.A.O Mr. Mike Fox
The Planning Inspectorate
The Square
Temple Quay
Room 3 O/P
Temple Quay House
Bristol BS1 6PN

Mike Washbourne
E: mike.washbourne@savills.com
DL: +44 (0) 20 3810 9843

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Sir

TONGE HOUSE, ROYAL CIRCUS, WEST NORWOOD SE27 0BL
EXAMINATION OF DRAFT REVISED LAMBETH LOCAL PLAN 2020-2035 – INSPECTOR’S MATTERS,
ISSUES AND QUESTIONS (MIQ)

RESPONSE STATEMENT ON BEHALF OF HARRISON HOUSING

Savills is instructed by Harrison Housing (‘the client’) to respond to the ‘*Matters, issues and Questions*’ (MIQs) with respect to the examination of the Draft Revised Lambeth Local Plan 2020-2035 (DRLLP), that was submitted to the Secretary of State for Housing, Communities and Local Government on 22 May 2020. Our client **objects most strongly** to the soundness of the DRLLP; and requests that the responses received ought to form a basis for discussion during the Hearing sessions on 28, 29 October and 10 November 2020.

As identified in **Appendix 1**, our client’s business (‘The Portal Home for Ladies’) is situated within the Royal Circus Roundabout Site, within the jurisdiction of the London Borough of Lambeth. The site has been identified as a proposed new **Site of Importance for Nature Conservation (SINC)** within the revised DRLLP. Policy EN1 of the DRLLP prevents development which would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of open space including any designated or proposed SINCS, unless mitigation or compensatory measures are included.

We set out below, our response to the MIQs. We deal primarily here with the matters you have raised with respect to the DRLLP, particularly where the issues are of most relevance to our client’s business and future redevelopment prospects of the site in question.

For completeness, the matters that this hearing statement relates to are as follows:

- Main Matter 7 (Environment and Green Infrastructure)
- Main Matter 3 (Housing) – Questions 3.4 - 3.8
- Main Matter 3 (Housing) – Questions 3.1 - 3.3

1. Background and Context

Harrison Housing is a non-profit organisation (a company limited by guarantee and a registered charity) that “...aims to provide and maintain high quality housing and support for older people of limited means in London”. This includes developing the highest standard accommodation, creating a friendly and supportive environment to enable residents to live independently, developing skills and solutions to tackle problems associated with age, and promoting a greater awareness of the housing needs of older people.

The charity’s first almshouse was acquired in 1869; and today, Harrison Housing owns and manages 12 almshouses located across London, providing accommodation to 171 residents. It is a leading provider of such housing in the capital city.

One of these homes is the Portal Home for Ladies (known as ‘Tonge House’), located within the centre of the Royal Circus Roundabout, in West Norwood (**See Map at Appendix 1**). Tonge House was first built in 1936,

with a bequest from Miss Bertha Mary Portal, who wished to provide good quality and secure accommodation for single Christian women in the parish. The charity was then managed by local trustees, and following retirement of the live-in caretaker, Harrison Housing was approached by the trustees and took over the charity's affairs in November 2017.

Following discussions and acting in close partnership with Portal Trust (the charity freeholder of the land), Harrison Housing considers that the property presents an excellent and compelling opportunity to increase the number of almshouse units within the generous grounds of Tonge House, approaching a century after its original development, consequently increasing the beneficiaries of Miss Bertha Mary Portal's bequest. The charity trustees are of course mindful of the current and growing housing crisis across London, and whilst not minded to overdevelop the West Norwood site, they are actively contemplating options to seek to increase the quantum of housing on site in such a way that will also allow significant garden and green space areas to be provided and maintained through new development which is itself of the highest quality.

Indeed, trustees are at the early stages of working up a redevelopment 'master plan' for the site's future – and a consultancy team has been appointed to provide advice on land uses, design and technical matters, as well as to carefully assess impacts of any new development on the existing site, nearby neighbours and the wider locality. Any development plans will also need to consider and address topics including landscape visual impact, transport considerations, biodiversity and ecology, impact on trees, public access to the site and its linkage to the community both physically and functionally, energy use and consumption, and of course, the principles of good design. To ensure that there is a transparent and open dialogue, it should also be noted that the charity trustees have made the Portal Home for Ladies existing residents at Tonge House broadly aware of the future plans for the site.

2. Consultation and Policy

The London Borough of Lambeth (LBL) is at the latter stages of its independent examination, and has recently published the Inspector's MIQ's Discussion Note (30 September 2020). The note provides a summary of the matters and issues identified by the Inspector in the form of questions, and will form the basis of the examination hearings which commence on 27 October 2020. It is noted that the questions may be refined in light of the Inspector's consideration of the hearing statements received prior to the examination hearings.

Before we set out the policies to which this statement refers, we would like to note that a representation for the DRLLP PSV and associated PCPM Jan 2020 (Regulation 19) was submitted to the Inspector. The reference for this representation is R039. Whilst we note that the site was identified as a SINC within the previous draft revised Regulation 18 consultation, at that time no decision had been made on the future redevelopment of the site and the Regulation 19 consultation was the client's earliest opportunity to make a formal representation.

In summary, our representation requested that the Royal Circus Roundabout site be **removed** as a proposed new SINC from the DRLLP PSV and associated PCPM Jan 2020. Fundamentally, we argued that the current site is significantly underutilised and would be an important asset for future almshouses development and housing plans for persons in need. The site also has the opportunity to contribute towards LBL's housing requirement, as set out with the DRLLP and draft New London Plan. Furthermore, any future redevelopment of the site would ensure that matters such as open space, green infrastructure and biodiversity matters are considered comprehensively.

The following policies are the basis of this hearing statement:

a) Policy EN1 (Open Space, Green Infrastructure and biodiversity):

Policy EN1 (Open Space, green infrastructure and biodiversity) includes criterion (b), which prevents development which would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space including designated or proposed SINCS, unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included, appropriate to the nature

conservation value of the assets involved. It further states that in the case of SINCS, the mitigation hierarchy in London Plan Policy G6 will apply.

Criteria (e) and (f) of the policy seek to improve the access to existing open space and green infrastructure, and also ensure that the new London Plan Policy G5 (Urban Greening) is applied on all major developments.

In relation to Policy EN1 and this statement, the Royal Circus Roundabout Site has been designated as a Proposed New SINC (as shown in **Appendix 2** of this letter). LBL's reason for the allocation has been outlined below:

“A relatively large area of predominantly native broadleaved trees, grassland and herbaceous planting within a dense urban area.”

Following the submission of the DRLLP, no correspondence between the Inspector and LBL has been published on this policy. However, the Inspector has raised the follow questions within his MIQs:

- (i) Should policy EN1 be less of a blanket policy on open space protection and show flexibility by taking into account whether the open space being lost is truly accessible space and in active use?
- (ii) Should the policy also include an additional criterion covering where the benefits of the alternative proposal outweigh the disbenefits of the loss of the open space, in recognition of the improved quality of provision?
- (iii) Should there be more flexibility in relation to urban greening requirements for major developments, which may be on constrained industrial sites?

b) Policy H8 (Housing to meet specific community needs):

The policy states that the Council will support the provision of housing to meet specific community needs, across a range of tenures, where it is demonstrated that the accommodation meets a certain set of criteria including local needs, standard of facility, design quality, accessibility and contribution to mixed, balanced and inclusive community's.

The loss of existing housing which meets identified specific community needs will be resisted unless it can be demonstrated that accommodation is no longer needed and the new accommodation will instead meet another identified priority local need; or the existing floorspace will be adequately re-provided to an equivalent or better standard on-site or elsewhere in the borough.

The Council will also support and encourage proposals which enable residents to live independently (criteria c) and relate to London Plan Policy H13 in terms of demonstrating how the design will address the needs of people with dementia and other long-term health conditions (criteria d).

The Draft New London Plan Policy H13 (Specialist older person housing) sets annual benchmarks for each London Borough. Lambeth has an annual target of 70 units per annum.

Following the submission of the DRLLP, it has been noted that the Inspector and LBL have undertaken correspondence, including discussions on Policy H8. Whilst LBL stated that the London Plan Policy H13 older person housing provision refers to benchmarks rather than targets, the Inspector has raised concerns regarding the two Plans and how they seem to have a disconnect here (INS02). Specifically, the Inspector's MIQs have raised concerns that ask whether:

- (i) Policy H8 makes adequate provision for the supply of housing for older people?
- (ii) If it should be more aligned with Policy H13?; and
- (iii) Does the plan show sufficient awareness of the need to meet the housing needs of this relatively fast-growing section of the Borough's population?

c) Policy H1 (Maximising Housing Growth):

The Council will seek to maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29. This includes, encouraging development on appropriate windfall sites not identified in the development plan.

In respect of Policy H1, the Inspector has raised questions on the cautiousness of the plans housing delivery; whether it provides a sufficient number and range of housing sites that are suitable for residential and mixed-use development and queried the relationship between housing provision and the Site Allocations Plan which the Council intends to prepare in the near future.

The Inspector has also questioned whether the draft Plan provides for at least a five-year supply of housing and whether sufficient allowance been made for non-completions for the plan to be effective in its housing delivery over five years.

3. Representations

Main Matter 7 (Environment and Green Infrastructure)

- i. ***Should policy EN1(open space, green infrastructure and biodiversity) be less of a blanket policy on open space protection and show flexibility by taking into account whether the open space being lost is truly accessible space and in active use?***

We agree with the Inspector's query regarding whether or not Policy EN1 should be a blanket policy on open space protection, or ought instead to show flexibility by taking into account the status of the open space being lost and its level of public accessibility and active use.

This point is particularly pertinent to our client's site at Royal Circus Roundabout, which has been designated as a New Proposed SINC. In its current context, the site is not accessible to the public and only serves the residents of The Portal Home for Ladies. We would also question if the site ought to be included as a SINC at all. Whilst we note that the SINC description states, "*A relatively large area of predominantly native broadleaved trees, grassland and herbaceous planting within a dense urban area*", regrettably, no detailed assessment can be found in the Council's evidence base which suggests this is a site of scientific importance or nature conservation. Whilst we note that the site is included within the Councils Review of Sites of Importance for Nature Conservation (2018), as set out within Table 4 (Page 17) relating to potential additional new SINCS, the assessment has been based on aerial photography interpretation and views from the site boundaries. Additionally, paragraph one on Page 21, states that further verification should be undertaken to confirm the habitat value of the Royal Circus Roundabout site. Overall, it is considered that the necessary assessments have not been undertaken and the designation of the site as a SINC is unwarranted.

Although the biodiversity value of the site is relatively unknown, given the size of the landholding and its comparatively inactive land use, the site is considered significantly underutilised for this urban location. The reality of this situation i.e. the site's underutilisation will not change unless a comprehensive redevelopment plan can be put in place, thereby opening up the site and improving its usability in the future.

With the above in mind, and as policy EN1 prevents development that will result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space, including designated new SINCS, we consider that the New Proposed SINC designation should be **removed** from the Royal Circus Roundabout site.

Given the site has existing trees, grassland and herbaceous planting, there will in all likelihood be some biodiversity value. In this respect, we consider that a specific open space/biodiversity criterion could be included within any site allocation that specifically relates to the site's future redevelopment.

As noted within LBL's first response to the Inspector (LBL01) the site could come forward within the Council's emerging Site Allocations DPD, which LBL have stated "*provides a further opportunity to consider potential for provision of older persons' housing on a site-specific basis*".

ii. Should the policy also include an additional criterion covering where the benefits of the alternative proposal outweigh the disbenefits of the loss of the open space, in recognition of the improved quality of provision?

Although we do not agree with the site's overall designation as a New Proposed SINC, we agree that the benefits of alternative proposals can outweigh the disbenefits of the loss of open space, specifically in respect of improving the quality of provision.

As noted above, the subject property is not currently accessible to the public, and any redevelopment would seek to open up the site to the public and include high quality useable open space. In this respect, any redevelopment of the site can only be seen as a 'positive factor' in the future provision of accessible open space in the Borough. As already suggested, provision and details of this open space could be included within a future site allocation.

iii. Should there be more flexibility in relation to urban greening requirements for major developments, which may be on constrained industrial sites?

Any future redevelopment of the site will ensure that the urban greening requirements of the London Plan Policy G5 are met. This will guarantee that where feasible the existing greening will be retained, and knit together with the sustainable design, which will include green walls/roofs and planting.

Main Matter 3 Housing Questions 3.4 - 3.8 (Specifically 3.7)

i. Does policy H8, which addresses housing to meet specific community needs, make adequate provision for the supply of housing for older people?

Following a review of the text within Policy H8, we consider that the supply of housing for older people has not been properly addressed. Policy H8 has been written to address housing to meet specific community needs and does not specify the importance of older persons accommodation. As noted within the New Draft London Plan Policy H13, "*By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent*". In this respect, appropriate accommodation is needed to meet the needs of older Londoners.

Whilst Policy H8 does make some reference to New London Plan Policy H13, it does very little to stress the importance of older persons accommodation and the number of units which will be required. We note that the Borough states that the London Plan targets (2017-2029) for older person housing are not targets, but benchmarks. Nevertheless, we consider that the authority should include its own target (70 units per annum) within the policy. We appreciate that the Council has included the indicative benchmark figure above as a monitoring indicator (IND5) in Annex 8 of the Plan (and will be reported on in Annual Monitoring Reports). However, in our client's view, that given the importance of this housing type for the future, it should be including within the Policy H8 supporting text (acting as a check for the Borough).

Harrison Housing considers that text should be included with the policy linking any proposed older persons housing with the above benchmark. Crucially, this would ensure that development schemes that propose this housing type are contributing to the benchmark adopted by Lambeth – and can be suitably associated with Policy H8.

With the above in mind, we would reiterate that the Royal Circus Roundabout site could be an excellent and much needed future provider of older persons housing, contributing additional residential housing of high quality and specifically designed for this important user group.

ii. *Should it be more aligned with policy H13 of the London Plan?*

The Inspector specifically stated within his second response (INS02), that the two Plans seem to ‘disconnect’ in terms of their policies on older persons accommodation. We completely agree and consider that Policy H8 needs to be updated to better reflect Policy H13 of the Draft New London Plan. Specifically, this would include the benchmarks that we have referenced above – also flagging the importance of meeting the need for older persons accommodation across the Borough.

iii. *Does the Plan show sufficient awareness of the need to meet the housing needs of this relatively fast-growing section of the Borough’s population?*

The Inspector brings attention to a valid point in respect of overall awareness of the need to meet older persons housing needs. As outlined above and within the London Plan, by 2029 the number of older person households will increase dramatically – and in short, new accommodation solutions will need to be put in place to ensure that this section of the population is properly housed in the future.

We would also like to reference the Housing our Ageing Population: Plan for Implementation (2012), which states that *“Local Planning Authorities should play a key role to ensure delivery of desirable housing in great places, tuned in to the local need and demand”*. Specifically, local planning authorities should ensure their Local Plans give prominence explicitly to meeting the needs of their ageing population, encouraging private and social providers to bring forward older persons housing.

Main Matter 3 Housing Questions 3.1 – 3.3

i. *Does the Plan address the Government’s prioritisation of the delivery of new homes, as expressed in paragraph 59 of the Framework, or is the Plan cautious in its housing delivery?*

Paragraph 59 of the NPPF states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*.

Policy H1 states that the Council will seek to maximise the supply of additional homes in the borough to meet and exceed Lambeth’s housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29. This housing requirement is in line with the New Draft London Plan; and in this respect we would like to comment on the recent correspondence between the Mayor of London and the Secretary of State. In a letter dated 13 March 2020, the Secretary of State directed the Mayor to work constructively with London boroughs to encourage more housing delivery and to make several modifications to the new London Plan and bring it in line with the NPPF. Following this, the Mayor has accepted that the plan will need amending and discussions are continuing on how best to resolve matters.

Under the GLA Act 1999, the Plan has to be approved by the Secretary of State before it can be adopted. We therefore consider that London Borough housing targets are most likely going to increase – and in our client’s view, this point is something that must be considered by this Examination process. If we were to revert back to the Draft New London Plan following the hearing sessions, Lambeth’s housing target was 15,890 net housing completions. Whilst this is only an indicative figure based on past methodology, if reinstated, this would produce a ‘void’ of circa 2,500 dwellings with LBL’s current housing target.

ii. Does the Plan provide a sufficient number and range of housing sites that are suitable for residential and mixed-use development and intensification?

As the Inspector has picked up in his second response letter (INS02), when looking into Topic Paper 9 (Schedule of large sites: years 1-10), it appears that there is a potential shortfall of 486 dwellings. It is noted that the Inspector has raised questions regarding sites that have been included within the draft Plan and if they relate to the adopted or new Plan.

Nevertheless, we consider that when one takes the above matters into consideration in the context of ongoing discussions on the London Plan and housing delivery, overall, the DRLLP will not provide a sufficient number and range of housing sites suited to residential and mixed-use development and intensification.

The Royal Circus Roundabout site is a perfect example of a potential large housing site (circa 80 dwellings) suitable for residential and mixed-use development. In some small (yet important) way, its future development would assist in seeking to plug the 'gaps' that have been identified by the Inspector.

iii. In terms of housing provision and site allocations, what is the relationship between this Plan and the Site Allocations Plan which the Council intends to prepare in the near future?

The above question is especially important to our client's site. In the event that the SINC designation is removed from the Royal Circus Roundabout site, we would like further clarification on if the client's site could come forward within the Site Allocations Plan.

As previously noted within the LBL's response (LBL01), the Site Allocations DPD will provide "a further opportunity to consider potential for provision of older persons' housing on a site-specific basis". In this respect, we consider that the Royal Circus Roundabout site could have a specific site allocation within this plan and seek to respond to the older persons and residential housing delivery that we have addressed above.

Summary Conclusion

Harrison Housing **objects most strongly**, questioning the soundness of the DRLLP, looking to the grounds set out in this letter. We find the proposed (blanket) allocation of our client's site as a SINC to be illogical and unjustified. Such allocation might easily stymie or prevent any future development plans for the property – and the organisation wishes to bring forward a high quality scheme that would help meet the Borough's residential development needs for older persons.

I trust my letter is clear and helpful, and that the Inspector will take full and proper account of my client's concerns. In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact me or my colleague, Edward James AssocRTPI.

We would appreciate being kept closely informed of the progress of the DRLLP.

Yours faithfully,



M D Washbourne MRICS
Director

Cc. Chief Executive Officer – Harrison Housing

Appendix 1 – Aerial View of the Royal Circus Roundabout Site: Tonge House and grounds



Appendix 2 - Proposed changes to existing SINCs and proposed new SINC designations to the south of Brockwell Park (site identified as light green circular shape)



