

REPORT FOR: **CABINET**

Date of Meeting:	14 July 2015
Subject:	Harrow School Supplementary Planning Document (SPD) – consultation outcomes and proposed version for adoption
Key Decision:	No
Responsible Officer:	Caroline Bruce, Corporate Director of Environment and Enterprise
Portfolio Holder:	Councillor Keith Ferry, Deputy Leader and Portfolio Holder for Business, Planning and Regeneration
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	Harrow on the Hill / Greenhill
Enclosures:	Appendix A – Summary of representations and the Council’s response Appendix B – Feedback from Drop-in-Sessions Appendix C - Harrow School Supplementary Planning Document – amended version for adoption

Section 1 – Summary and Recommendations

This report documents the outcomes of consultation on the draft Harrow School Supplementary Planning Document (SPD) (30 March – 31 May 2015) and the Council's response to these, and recommends Cabinet adopts the draft SPD, subject to a number of amendments in response to the outcomes of the consultation.

The purpose of the SPD is to provide further guidance on the adopted Local Plan's Site Allocation: GO1 - Harrow School; this fulfils the Plan's commitment to bring forward an SPD with an agreed masterplan for the School's future development.

Recommendations:

Cabinet is requested to:

1. Note the petition (hard-copy and online) in relation to land currently occupied by the Harrow Hill Golf Club received in response to the consultation on the draft SPD.
2. Note the representations received in response to the consultation on the draft SPD and the Council's responses to these set out in Appendices A and B.
3. Adopt the revised Harrow School SPD attached at Appendix C, including deleting the proposals for all-weather pitches and coach parking on land currently occupied by Harrow Hill Golf Club, which directly responds to the petition received.
4. Delegate authority to the Divisional Director of Regeneration and Planning following consultation with the Portfolio Holder for Business, Planning and Regeneration, to make typographical corrections and any other necessary non-material amendments to the Harrow School SPD prior to formal publication of the SPD.

Reason: (For recommendation)

To ensure that the SPD, when adopted, is afforded weight as a material planning consideration and secures the principle of development for Harrow School's future needs, whilst preserving the special character, heritage and amenity of Harrow Hill in line with the adopted Local Plan's Site Allocation for the School.

Section 2 – Report

Background

2.0 Harrow School, located on Harrow Hill, is one of the UKs most well-known educational institutions. Its estate comprises many natural and built environment assets, including listed and architecturally important buildings, sites of nature conservation importance and metropolitan open land. The School plays a vital role in maintaining a wide range of these assets and funding their improvement. However with changing educational methods and expected standards of facilities, the School has its own development needs.

2.1 In recognition of this Harrow's Site Allocations Local Plan document (adopted July 2013) allocates the School Estate (Site Allocation G01) to establish the principle of the redevelopment and refurbishment of the School's buildings and facilities. It states that the Council will bring forward a masterplan to provide a framework for the School's future development proposals in the form of an SPD. The proposed SPD (Appendix C) realises that commitment and is a result of close working between Council Officers and the School to deliver proposals that will benefit the School, the wider community and the special character of Harrow Hill.

Proposed Harrow School SPD

Purpose and Development Proposals

3.0 The purpose of the Harrow School SPD is to provide a framework within which planning applications for the School can be prepared and will be used by the Council as a material consideration when determining any future planning applications for the School.

3.1 The SPD therefore documents the characteristics of the site and how it is used, the challenges facing the on-going use of the site, and then outlines twelve key projects proposed to be implemented over the next 15-20 years (reduced from fourteen proposals as a result of the consultation on the draft SPD, as outlined in sections 5 and 6). For each project the SPD outlines the rationale for the proposal, the preferred strategy / location, and the relevant considerations that will need to be addressed when a detailed planning application is submitted to the Council. There is also a dedicated section on design consideration for each proposal outlined in the SPD.

3.2 A summary of the proposed new developments contained in the SPD is outlined below. It should be noted that these proposals are indicated by red line boundaries of the preferred location for each new building, and would be the subject of full planning applications. The SPD does not contain detailed plans and specifications for each building (this will be a part of any planning application), as this is an overarching, long term masterplan for the Estates development and renewal. The proposals are as follows:

- a. Create a High Street visitor hub / School reception to be located in the area of the former Dove Cottage. This will provide a more visible, impressive and accessible “point of arrival” for School visitors together with a new location for the School Admissions Department.
- b. Improve the environment of the High Street by providing a Shared Surface to reduce the dominance of motor vehicles primarily through lower speeds and improved pedestrian and parking facilities. (Note: this proposal was contained in the consultation version of the SPD but is recommended to be removed from the adoption version, as outlined in sections 5 and 6 below).
- c. New Science Building providing additional and more appropriate teaching space for Biology and Chemistry in light of the current shortfall of adequate provision. Science subjects have become extremely popular and this trend is increasing, therefore, there is a need for modern accommodation and more laboratories for teaching the new curriculum.
- d. Develop new Drama Studio space and a larger foyer through extension of the Ryan Theatre and conversion and relocation of the existing squash courts adjacent to the Theatre. This facility is required to complement drama at the Ryan Theatre and would restore a drama facility for low level productions (which was sacrificed a few years ago in order to create teaching space for the introduction of Photography and a co-located I.T. department). The Ryan Theatre has no separate drama teaching space which severely disadvantages this element of the curriculum. In addition the foyer to the existing Ryan Theatre is cramped. A new extension would address both needs.
- e. Provide a new Music Centre directly to the south of the existing music department. This will address the requirement for a properly equipped performance and rehearsal auditorium of the optimum size, together with a solution to a current shortage of practice rooms and instrumental tuition space.
- f. Create a new Sports Centre to provide a replacement for the existing structurally unsound Sports Centre and swimming pool. This new Sports Centre would be better positioned in relation to the external sports facilities developed in the last 10 years and with a range of modern fitness facilities which will be appropriate for third party use; a pavilion for tennis and golf (and to solve a serious sports equipment storage problem); as well as providing a pitch-side medical facility. The additional requirements will mean the replacement facility will be larger than the existing Sports Centre building (which will be demolished) but does also provide for rationalisation of many smaller ancillary buildings as well. It is proposed that the new sports hall and swimming pool building would be sited adjacent to the existing sports hall, with the existing sports halls footprint returning to open space. Of note, there would be two pools, one of which would be a training pool and thus a

great asset not only for Harrow School, but to the wider community including local schools who could also benefit from these facilities.

- g. Refurbish the existing historic minor sports facilities which are located part way down the '100 steps'. This facility comprises the old squash courts, rackets and fives courts and waiting / changing facilities. These are frequently used at the School, both for Harrow School pupils and visiting competitors. The facility is in urgent need of refurbishment and provision of modern and adequate changing facilities. It is proposed that the squash courts are reinstated into their original location displacing sculpture, which is to be relocated into the Churchill Schools arts building.
- h. Provide additional all-weather pitches for hockey and football together with changing rooms and parking for visiting teams. It is believed that the all-weather hockey pitches would be the only such facility in the London Borough of Harrow and would be an asset not only for Harrow School but to the wider community. (Note: this proposal was contained in the consultation version of the SPD but is recommended to be removed from the adoption version, as outlined in sections 5 and 6 below).
- i. Demolish Peel House and the Gardener's compound in order to create a new landscaped core extending from the Chapel to the sports fields, opening up views from both the back of the Chapel out to Wembley and London City and back up to the School from the sports fields.
- j. Relocate a 5-a-side football pitch close to its associated boarding house, as the current one is remote.
- k. Provide additional car parking as current provision is insufficient for visiting parents, and the public.
- l. Utilise existing under-developed or previously developed vacant sites along Harrow Park to provide new staff housing.

3.3 The SPD also has a strong focus on conserving and enhancing the historic and natural environments, including Metropolitan Open Land openness, sensitive landscaping, reinstating viewing corridors and creating first-class new buildings, facilities and spaces. There is a commitment in the SPD to continue to support the existing wider community and other schools' use of the sports and recreation ground and cultural facilities. The provision of new facilities will therefore be of great benefit to these groups.

Consultation arrangements

4.0 The former Local Development Framework Panel considered the draft SPD at its meeting on 5 March 2015 and approved it for consultation. Cabinet subsequently considered the draft SPD at its meeting on 19 March 2015 and also approved it for consultation.

4.1 The draft SPD was subject to consultation in accordance with the Council's adopted Statement of Community Involvement (SCI) and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation period commenced on 30 March and was scheduled for a five week period, closing on 1 May 2015. The process initially included:

- a. Notifying all the consultees on the Council's Local Plans database who have indicated they are interested in Planning Policy consultations. In this instance, this entailed over 800 letters being sent out, and totalled 1049 including email notifications. These consultees include all the major residents associations in the Borough and individual residents, plus statutory bodies and local businesses.
- b. Publishing a Public Notice in the Harrow Times on 2 April 2015.
- c. Publishing the details of the consultation on the Council's website, including a link to the consultation from the 'Take Part' tab on the home page.
- d. Holding public drop-in-sessions. Three drop-in-sessions were initially scheduled and included: Harrow Town Centre: Thursday 16 April 5.30pm – 7.30pm; Monday 20th April 12.30pm – 2.30pm and the Old Harrovian Room – Harrow School: Thursday 23rd April – 6.30pm to 8pm. A special meeting was also set up for Harrow Hill Forum and the Harrow Conversation Area Advisory Committee.

4.2 The Council does not normally write to individual adjoining / nearby properties on strategic documents such as SPDs - this happens when a Planning Application for a development is submitted to the Council. This is because the contents of an SPD or Local Plan document can cover or affect a very large proportion of the Borough, making identifying and writing to every property that could be considered as being affected disproportionately resource intensive.

4.3 The actions outlined above met and exceeded the statutory requirements for consultation on a draft SPD.

4.4 Concern was expressed by residents during the initial five week consultation period that insufficient publicity was undertaken to make people aware of the draft document and consultation arrangements. Following this feedback, a number of additional actions were taken:

- a. The Consultation period was extended from the original five week period by a further four weeks and therefore finished on the 31st of May (four weeks is the statutory standard for consultations of this nature; with the extension, the period for the draft Harrow School SPD ran for a total of nine weeks).
- b. A further public drop-in session was held on the 14th May at Gayton Library, Harrow.

- c. Public notices were placed on lampposts on roads surrounding the School's estate, particularly in the vicinity of the potential development proposals.
- d. Notifications were delivered to properties on Harrow Hill within the vicinity of the proposed development locations outlined within the SPD.

4.5 Notwithstanding the above, concern continued to be expressed in relation to the consultation. This included the consultation period (already extended by four weeks), the geographic extent of the notifications, the format of the 'drop-in-sessions' and the fact that a second round of consultation would not be held on the amended document.

4.6 In terms of the consultation period, this had already been extended and at nine weeks, was double that required by regulations. In terms of the geographic extent of the area-specific notifications, it was considered that this was sufficient given the nature of the document and that the options relating to amendments to the highways arrangements (i.e. the SPD proposals that could potentially have the widest implications) were proposed to be recommended for removal from the document, based on feedback already received during the consultation. Additionally, signs had also been placed around the School Estate. In regard to the drop-in-sessions, this format is widely used by planning authorities and others consulting on proposals across public and private sectors, as it gives everyone in the room a chance to discuss their individual concerns with an informed member of the team, in contrast to public meetings which tend to be dominated by the more vocal participants. In terms of a second round of consultation on the amendments, this is not required by the Regulations, but respondents are advised of the outcomes of the consultation and the Council's response.

4.7 Feedback on the consultation arrangements for the draft SPD will however be used to inform and improve consultation arrangements on future documents.

4.8 A petition (hard copy and online and containing over 2,000 signatures) was received in relation to the proposals to build all-weather sports pitches and coach parking on the site currently occupied by Harrow Hill Golf Club. The 'terms' of the petition differ slightly between the hard copy/online versions of the petition; both are outlined below:

Format 1 (some of the hard copy petition, all of the online petition)

'Save our metropolitan open space and nature conservation area at Harrow Hill Golf Course'

Format 2 (remainder of the hard copy petition)

'We, the local community, residents and businesses of Harrow, petition Harrow Council to prevent a coach park and all weather pitches being built by Harrow School on the land at Harrow Hill Golf Course.'

We are very concerned about the loss of this Metropolitan Open Space, Area of Special Character and Nature Conservation Area; as well as transport issues on Kenton Road and potential flooding on Watford / Kenton Roads.

We insist that you keep this Metropolitan Open Space as it is, for ALL the local community to enjoy’.

4.9 The petition was submitted in response to the statutory consultation process relating to the draft SPD and was due to be formally ‘received’ by Cabinet under the ‘Petitions’ agenda item earlier on the agenda for this meeting.

Consultation Outcomes

5.0 As a result of the consultation arrangements outlined above, there were a total of **218** responses to the consultation, plus a petition containing a total of 2,106 signatures (1,124 hard copy and 982 online). The substantive points raised in the responses are detailed, alongside the Council’s responses, in the Schedule of Consultation Responses at Appendix A to this report. A summary of the points raised during the drop-in-sessions is included in Appendix B. The main issues raised are summarised below.

Consultation arrangements

5.1 Many of the responses expressed concern about the arrangements for consultation on the draft SPD. As noted in section 4 above, the initial arrangements met and exceeded those required under the Town and Country Planning (Local Planning) (England) Regulations 2012; the additional arrangements further exceeded these requirements. Subsequent applications for planning permission will be subject to further consultation as they come forward.

The principle and function of a Supplementary Planning Document

5.2 Many of the responses queried why an SPD had been prepared and expressed concerns regarding the implications of the document being adopted with respect to future planning applications. Many responses also queried the role of the Council in the process given that the SPD is essentially a masterplan for the School’s estate. Some comments also suggested that the SPD should have covered the entire Hill area.

5.3 Annex 2 of the National Planning Policy Framework (NPPF) defines SPDs as ‘documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development *on specific sites*, or on particular issues, such as design’ (emphasis added). The NPPF therefore clearly indicates that it is appropriate for SPDs to be prepared for specific sites. The draft Harrow School SPD supplements Harrow’s Local Plan site allocation Site G01, which is one of the largest allocated sites in the Harrow Local Plan, and one with many multi-layered planning considerations (including, for example, heritage, biodiversity, Metropolitan Open Land,

operational needs of an educational facility etc). Therefore additional guidance provided by the SPD is considered beneficial.

5.4 Furthermore, the supporting text to the Harrow School site allocation clearly indicates that an agreed masterplan will be prepared; the draft SPD forms that masterplan. The Council (as Local Planning Authority) lead on the preparation of the SPD, but the Harrow School was heavily involved as the SPD relates to the School's estate. The majority of the Hill and surrounding area is already covered by SPDs in the form of Conservation Area Character Appraisals and Management Strategies. Additionally, the Core Strategy Local Plan already provides area specific guidance for all of Harrow on the Hill & Sudbury Hill. The scope of the Harrow School SPD is to provide a masterplan for the School Estate (i.e. a specific site, as envisaged in the NPPF), not the entire Hill.

5.5 The NPPF indicates that SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. The National Planning Practice Guidance (NPPG) indicates that a material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission). There is however a distinction between the question of whether something is a material consideration and the weight which it is to be given. Provided it has regard to all material considerations, it is for the Council (as Local Planning Authority) to decide what weight is to be given to the material considerations (such as the proposed SPD) in each case. Whilst the SPD does establish that the principle of the proposed development is acceptable, it does not convey an 'automatic approval' of subsequent planning applications – that concern raised is therefore unfounded.

5.6 It should be noted that the SPD does not preclude the school coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Harrow Local Plan. The SPD would be a material consideration to the extent that it is relevant to the proposal. Similarly, works currently occurring on the site should not be seen as pre-empting the outcomes of the SPD, as provided these have the appropriate planning permissions, they can occur notwithstanding the SPD process (a number of representations expressed concern in this regard).

New Entrance / Admissions Building

5.7 A number of responses expressed concern regarding the proposed new entrance / admissions building on the High Street. Concerns related to the potential impact of such a proposal on the character and views in the area, as well as car parking and access arrangements. In this regard, the draft SPD includes design guidelines for this proposal (and other proposals) that are considered to cover the points raised in the representations; there is scope for some of these to be expanded and strengthened. In terms of traffic impacts and car parking arrangements, the School is intending to commission a detailed transport assessment covering the entire estate. This will help inform the design development of individual projects, as well as considering

the cumulative impact of the proposals. This transport assessment will accompany any subsequent planning applications.

Highways proposals

5.8 A significant number of representations were received against the options for consideration that were posed within the draft SPD to alter the highways arrangements in the High Street in order to improve traffic flows and pedestrian safety. These options included a shared-surface, one-way system, limiting access (to only authorised vehicles, emergency vehicles, pedestrians and cyclists), and alterations to bus routes.

5.9 The key areas of objection were that the arrangements would worsen traffic congestion and safety rather than improve it, changes to bus routes would impact upon accessibility and public transport usage on the Hill, impact upon residents and businesses being able to access their properties, and would result in the loss of parking on the Hill. Some alternatives were offered, including pedestrian subways or bridges, and additional road bumps, zebra crossings and safety rails. A small proportion of representations did express support for the share surface arrangements. There were also a large number of objections to the proposals to include Harrow School branding on street furniture in the High Street.

5.10 Transport for London responded to the consultation and noted the potential impact on some of its bus operations that could potentially arise from some of the options and indicated that further information and review would be required if any of the proposals were taken further.

5.11 Although the various options were mainly highways-related and would be taken forward under the relevant highways legislation, they were included in the draft SPD as they are relevant to the overall masterplan for the School estate, which includes land on both sides of the street.

5.12 Given the level of concern raised against the options as a result of the consultation on the draft SPD and that any proposals would in the main be taken forward under the relevant highways legislation, it is recommended that these be removed from the amended SPD. Whilst relevant to the SPD, they are not critical to the delivery of the other projects identified in the SPD.

Metropolitan Open Land Swap

5.13 The draft SPD identifies the potential to include the proposed landscaped core extending from the Chapel to the sports fields in Metropolitan Open Land (MOL). Doing so will protect this core landscape from future development and will also serve to offset the proposed loss of MOL as a result of the proposed new Sports Centre and Music Centre. A significant number of the representations received objected to the principle of a 'land swap', as well as questioning the openness and value of the proposed landscape core (i.e. the potential replacement MOL), having regard to the existing and proposed buildings in the vicinity of this core on the openness, as well as the quality of the potential replacement MOL. Others felt that the need

to build on MOL could be avoided by using sites already containing buildings (i.e. rebuilding the Sports Centre on the current Sports Centre site).

5.14 The draft SPD identifies the principle of a MOL land-swap in the context of the overall master plan for the School Estate. This is in a general sense, having regard to the extent of proposed new buildings and those proposed to be removed. It does not formally agree any land swap. Detailed consideration as to whether a land swap is acceptable will occur when formal planning applications are made and would be subject to a s106 planning obligations agreement and subsequently included in any Local Plan review. Additional text is included in the SPD to clarify the considerations that will be taken into account for the principle of a land-swap to be taken forward into actual reality.

5.15 The primary function of Metropolitan Open Land is its openness, rather than 'quality'. Area of MOL to be displaced to accommodate the new buildings is less than the size of two tennis courts, which is de-minimus in the context of the +300ha of MOL designated in the School's estate. Nevertheless the School's masterplan proposes a no net loss of MOL and makes provision for the reconfiguration of MOL to create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of the Hill itself, thereby protecting the openness of that part of the site and its strong link with the top of the Hill. The 'quality' of the MOL would also be enhanced, as it would be extensively landscaped and form part of the overall landscape structure of the site. The new Sports Centre, whilst proposed to be located on existing MOL, will serve to improve the openness of MOL elsewhere on the site by enabling the rationalisation of smaller sports related buildings scattered throughout the playing fields.

5.16 The Greater London Authority (GLA) has advised that 'on the basis that the SPD advocates an approach that would result in "no net loss in the amount or quality of MOL", and that the reconfiguration would deliver a coherent and contiguous expanse of MOL (and an anticipated net gain in MOL) GLA officers are satisfied that the SPG (*sic*) is in general conformity with the London Plan'.

5.17 For operational and construction reasons, it is not practical to rebuild the Sports Centre on the existing site; this would leave the school and external users without a Sports Centre for at least two years. Other suggested sites included Peel House, which is proposed to be demolished. However, the demolition of Peel House is integral to the proposal to create a landscaped core and open-up views along this. Locations further up the hill are also in greater proximity to Listed Buildings, and could cross into the Conservation Area.

Pitch and Putt

5.18 A significant number of representations as well as a petition (hard copy and online and containing over 2,000 signatures) objected to proposals to build all-weather sports pitches and coach parking on the site currently occupied by the Harrow Hill Golf Club. This land is owned by the School and

is leased to the occupier on a short-term basis. When under the School's management, that area was used as playing pitches.

5.19 Key grounds for objection raised include the proposal being inappropriate on MOL, the impact of the proposals on the openness of MOL, Area of Special Character, site of importance for nature conservation, flooding, trees, traffic and the loss of the golf course / café as a local business and amenity.

5.20 The London Plan and Harrow Local Plan indicate that appropriate development within Metropolitan Open Land should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Both the astroturfing and the coach parking are associated with the use of the site, and the wider MOL estate, for outdoor recreation. One of the primary considerations with respect to development on MOL is the impact of the development on the openness of the land. Coach parking and all-weather pitches (including astroturfing), whilst hard-standing, will maintain the openness of the site and are associated with outdoor recreation, an appropriate use of MOL land.

5.21 The Council's Local Plan indicates that the strategic value of the Harrow on the Hill Area of Special Character is 'the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings ... the boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement'. Consequently, the strategic value of the area of special character proposed to be used as all-weather pitches and coach park is its function as Metropolitan Open Land, namely its openness. As noted above, the proposed use of the site for an outdoor recreation use and associated coach parking is an appropriate use in MOL.

5.22 A transport assessment will be required to accompany any planning application; this will assess the impact of the proposal on the surrounding road network. The provision of coach parking at this location should reduce the number of vehicles using streets on the Hill itself. As stated above, the school intends to commission an Estate-wide transport assessment that will consider the overall impact of the SPD proposals on the transport network.

5.23 The land on which the pitch-and-putt and café is located is leased from Harrow School on a short term tenancy. The Council's Local Plan indicates that the loss of an existing sport facility will be permitted if there are adequate similar facilities within walking distance which offer equivalent provision. There are a number of other golf courses within the borough, including Stanmore Golf Club and Pinner Hill Golf Club, with several others just outside the borough (i.e. Playgolf, Watford Road, 0.7 miles from the subject site). Operational aspects such as membership arrangements, ability of players (i.e. beginners etc) are outside the scope of the planning system. Furthermore, NPPF paragraph 74 accepts that the loss of one outdoor recreation use may be acceptable where the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss.

5.24 The café is ancillary to the use of the site for outdoor recreation and unlike outdoor recreation; its retention is not specifically sought by the policies contained in the Harrow Local Plan. There may be scope for the re-provision of the café as part of any building associated with the proposed all-weather pitches.

5.25 Detailed issues relating to matters such as biodiversity, flooding and impact of any potential floodlighting will be addressed at the time any application for planning permission is received.

5.26 Many of the issues raised against the proposals for Zone B / the Harrow Hill Golf Course site will be considered more fully as part of detailed design and technical assessments that are currently not available as part of the SPD process (as it is an overarching master plan rather than detailed proposals). However, given the substantial concern raised in the representations and petition with regards to the proposals, Officers in consultation with the School recommend that these should be removed from the document. This will enable more comprehensive proposals for the site to be drawn up, including detailed designs for actual buildings and the layout and scale of any sporting facilities and coach parking. Such information should more fully address the concerns raised in the representations and petition but will necessarily take more time and will go into a level of detail beyond that considered appropriate in an SPD. Such work would be progressed by the School as a separate body of work and form the basis of any future planning application. Deleting the proposals from the SPD will enable the SPD to progress to adoption to provide the overarching masterplan and guidance for the remainder of the proposals, the bulk which are Zone A, are intended to be progressed in the next 0-5 years and not dependent on Zone B. The draft SPD identified development of the all-weather pitches / coach parking as part of the 5-10 year phase of the SPD masterplan, coinciding with when the lease to the current Harrow Hill Golf Course expires.

5.27 It is considered that the removal of the proposal will not impact upon the appropriateness or implementability of the remaining proposals within the SPD. Removal of the proposal from the SPD does not prevent the School submitting an application for planning permission for all-weather pitches and coach parking at a future time; such an application would be assessed against the development plan at the time (i.e. the London Plan and the Harrow Local Plan).

General

5.28 A number of representations considered that the proposals in the SPD would have an impact upon rights-of-way that pass through the site. The proposals are not considered to have a direct impact upon any rights-of-way, as defined by the borough's 'Definitive Map'. In this regard, rights-of-way will be included on Figure 2 (Designations) to enable this point to be evident to anyone using the document.

5.29 Comments were received in relation to ensuring / securing public access to the proposed facilities (i.e. sporting / cultural). The SPD notes the existing external use of many of the facilities on the site and recognises that

many of the new facilities will benefit existing users, as well as providing capacity to accommodate greater local school and community use, especially the proposal for a training pool and expanded sports centre. The extent of access to the new facilities will form part of the assessment of and negotiation on the detailed planning applications for these facilities.

Statutory consultees

5.30 Statutory consultees were notified of the draft SPD in accordance with the Regulations. Responses were received from Brent Council, Transport for London, the Highways Agency, Historic England, Natural England, the Environment Agency, Heathrow Airport and Thames Water. The points raised by these consultees are outlined above, as well as section 9 below.

Planning Policy Working Group

5.31 The Planning Policy Working Group (PPWG) discussed the consultation outcomes and amended SPD at its meeting on 29 June. The group raised specific points relating to the removal of the highways options and all-weather pitches / coach parking options from the SPD, the MOL land-swap, the new entrance building and parking / traffic, public access to the landscape corridor, and the potential for further consultation.

5.32 Many of the issues raised by the Group are addressed above and in Appendix A. A point not addressed above was that the deletion of the highways options meant that the SPD did not adequately address transport impacts of the SPD. In this regard, the SPD does not envisage an increase in pupil numbers and the proposals predominately relate to new and improved facilities to serve the existing student population. Transport assessments at application stage will consider the impacts of specific proposals in more detail and the School is preparing an overall transport assessment for the School.

5.33 There was also the view that the background highways 'context' section for the SPD (paragraphs 4.27-4.30) should be deleted as this could be interpreted as providing evidence or a rationale for subsequent highways interventions. In this regard, these paragraphs are considered to simply describe the current situation and issues in the context of the SPD (many of which were reflected in the representations received), rather than implying potential solutions). To delete them would mean the SPD makes very limited reference to the High Street that the School estate straddles, the context in which the master plan has been developed and how this has influenced other proposals in the SPD; for example, the desire to co-locate faculties together so that students aren't having to cross the road as much. Feedback from the consultation supports the content of 4.27-4.30 (i.e. there are issues), but clearly didn't support the highways interventions (with these being deleted).

5.34 A further issue raised by the group and not addressed above was that the SPD should specifically seek to secure public access to the proposed landscape core. Such a proposal is not considered practical nor implementable as the school is a boarding school and therefore in operation 24 hours a day, seven days a week; unlike 'day' schools, Harrow School's duty to safeguard its pupils is therefore 24/7. Furthermore, the landscape

corridor itself is intended to be a key pedestrian route for students throughout the day and evening and throughout the entire week. The inclusion of the requirement would potentially create a community expectation that would be difficult in practice to deliver for the above reasons. Additionally from a planning policy perspective, it is difficult to justify the inclusion of the suggested requirement with respect to the landscape corridor (for example, it would be difficult to justify the refusal of an application that did not provide such access). The school already facilitates / is proposing a significant amount of community access to other parts of the site, including several proposals within the SPD. This access (namely to community and recreational uses, rather than 'open land') is supported in policy terms and more manageable with respect to controlling access, safeguarding and periods of use (i.e. after school).

Proposed Amendments

6.0 In light of the representations received and the Council's response to them (summarised in section 5 above and detailed in Appendices A and B) the following amendments to the document are recommended:

- (a) Removal of the potential options for changes to the public highway in the High Street.
- (b) Removal of the proposal for additional all-weather pitches for hockey and football together with changing rooms and parking for visiting teams on the land currently leased to Harrow Hill Golf Course / Pitch-and-Putt in Zone B.
- (c) Additional text clarifying the rationale for the SPD and its role as a 'material consideration' in the determination of planning applications.
- (d) Inclusion of rights-of-ways that pass through the site on Figure 2 (Designations) and clarification in the text that none of the proposals within the SPD have a direct impact on any rights-of-way.
- (e) Clarification of process of taking any 'MOL land-swap' forward, including the matters that will be considered.
- (f) Clarification of the nature of some of the proposals as a number of representations appeared to misunderstand these.
- (g) Strengthening of the design guidelines included in Section 6 in response to representations where appropriate.
- (h) Minor changes with respect to dates and consistency with terminology (i.e. SPD / masterplan)

6.1 The amended document is included in Appendix C.

6.2 It should be noted that some additional, or minor, modifications to the SPD have also been made. These are minor changes that have been made to provide clarity, improve grammar, spelling corrections and factual changes where needed.

6.3 Prior to final publication, the SPD may be subject to desktop publishing to improve its legibility and to update mapping as outlined in this report (i.e. inclusion of rights-of-way on Figure 2: Designations, removal of the highways options (option 8) from Figure 6: Indicative Proposals Areas, and removal of Zone B 'Sports Use' (i.e. the land owned by the School and leased to the tenants of Harrow Hill Golf Course). Any such amendments will not change the content, but would be focused on updating the graphics.

6.4 In regards to the petition received in relation to the all-weather pitches / coach parking, the Council's Petition Scheme indicates 'if a petition contains more than 2000 signatures of people who live, work or study in the Borough (the address in the Borough at which they live, work or study must be provided), it will be considered / debated at a meeting of full Council.' However, the Petition Scheme also indicates 'if the department think it is appropriate to take the action requested immediately, the acknowledgement will explain this, and the petition will be closed.' The amended SPD for adoption included in Appendix C removes the proposals for all-weather pitches and coach parking to which the petition relates. This removal is considered to respond fully to the petition and subject to Cabinet agreeing the removal (i.e. the amended document at Appendix C), the petition can be closed. Furthermore, the petition does not need to be considered at full Council as with the removal of the proposals from the SPD, the Council is no longer considering any active, formal proposals relating to land currently occupied by the Harrow Hill Golf Course.

6.5 As noted above, removal of the proposal from the SPD does not prevent the School submitting an application for planning permission for all-weather pitches and coach parking at a future time; such an application would be assessed against the development plan at the time (i.e. the London Plan and the Harrow Local Plan).

Options Considered

7.0 There is one alternative option to the preparation and adoption of an SPD which is to do nothing. Notwithstanding the commitment in the Site Allocations Local Plan document to bring forward an SPD for the School, this is an option, albeit with some disadvantages as outlined below.

7.1 If the 'do-nothing' option was continued Council officers, the Planning Committee and in certain cases, Planning Inspectors, would continue to exercise judgement when making decisions on specific proposals that Harrow School put forward, but without the guidance the SPD would provide. However such an approach without this overall agreed framework for the School's future development may give rise to greater uncertainty and longer decision making, and does not allow for the more strategic consideration of the Estates development as a whole, including giving guidance on key land use principles, notably that of development in Metropolitan Open Land. Set

against the benefits and relatively modest costs associated with the preparation of an SPD, this option can be discounted. The removal of the highways proposals and the all-weather pitches / coach parking from the SPD is however considered an acceptable alternative for those specific aspects. Any highways proposals would be implemented through the relevant highways legislation. The all-weather pitches / coach parking proposals / site are considered sufficiently independent from the main proposals in Zone A to be able to be separated without impacting upon the rest of the SPD and dealt with just by way of a planning application.

7.2 As noted above, the option suggested in a number of representations that the SPD should cover the entire Harrow Hill area is considered unnecessary as these areas are already covered by Conservation Area Character Appraisals and Management Strategies, which provide guidance on how the policies of the Harrow Local Plan (particularly those relating to heritage) will be applied.

Implications of the Recommendation

Performance Issues

8.0. The adopted Core Strategy contains a detailed schedule of monitoring indicators, with associated targets, triggers and contingency actions, to ensure that the delivery of Harrow's spatial vision remains on track (and if necessary, brought back on track) throughout the plan period (2009-2026). These indicators are monitored through the continuing publication of the Authority's Monitoring Report (AMR).

8.1 The purpose of the proposed SPD is to help Harrow School continue to thrive as a leading school, whilst preserving and enhancing the character and appearance of the area. A number of targets in the AMR relate directly to this, including a specific target to retain Harrow School as a major institution within the Borough, and indicators monitoring the impact of proposals on heritage assets, and areas of special character. These indicators will therefore be used to monitor the impact of this SPD.

Environmental Impact

9.0 Sustainability appraisal is not required for supplementary planning documents but the Council must still consider whether there is a requirement for strategic environmental assessment (SEA). The proposed SPD does not (cannot) introduce new policy but simply supplements the Site Allocation (GO1) for the School which was subject to full sustainability appraisal (incorporating the requirements of SEA) at each formal stage of the Site Allocations documents preparation. Therefore, it is considered unlikely that the SPD would give rise to significant environmental effects requiring SEA. This conclusion has been supported by an SEA Screening Opinion conducted by the Council which was submitted to the Statutory Bodies (Historic England, Natural England and the Environment Agency) upon commencement of public consultation for their verification.

9.1 Historic England and Natural England responded to the consultation and advised that they concur that a full SEA is not required as the SPD is subservient to the Harrow Local Plan, which has been assessed under the Habitat Regulations.

Risk Management Implications

10.0 Separate risk register in place? Yes

10.1 As noted above, public participation is one of the regulatory requirements for the preparation of an SPD, and both the Regulations and the NPPF are clear about the secondary (non development plan) role of SPDs. The draft SPD the subject of this report has been prepared specifically for consultation purposes and recognising that it cannot introduce new policy or add to the burden upon development. Officers will manage the adoption of the SPD to ensure that it complies with regulatory requirements for the preparation of the SPD. Proper application of the SPD to relevant proposals should effectively eliminate the chance of any appeals being submitted.

Legal Implications

11.0 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

11.1 Although the proposed SPD is not a development plan document it will, on adoption, be a material consideration in the determination of proposals for development by Harrow School within the Harrow School Estate (as delineated by the red line boundary in Site Allocation GO1) and any appeals against refusal of proposals. The adoption of the SPD and proper application of it to relevant proposals should however effectively eliminate the chance of any appeals being submitted.

11.2 The Council is required by law to consult on the SPD and to take into account all consultation responses received before adopting the SPD.

Financial Implications

12.0 The draft SPD and associated consultation and adoption represent a relatively minor project and the costs will be met by the school.

Equalities implications / Public Sector Equality Duty

13.0 By definition, supplementary planning documents cannot introduce new policies nor modify adopted policies and do not form a part of the development plan. Rather, their role is to supplement a 'parent' policy in a development plan document. The draft SPD the subject of this report supplements Site Allocation GO1 of the Site Allocations Local Plan

document. A full equalities impact assessment was carried out at each formal stage in the preparation of the Site Allocations Local Plan.

13.1. Therefore, there is no requirement to carry out an equalities impact assessment of the draft SPD the subject of this report, because the impact of implementing Site Allocations GO1 has already been considered as part of the Site Allocations equalities impact assessment. Nevertheless, EQIA screening has been conducted on the proposed SPD, which confirmed that there were no negative implications on any equalities group as a result of the SPDs guidance, and thus no need for a full EQIA to be undertaken.

Council Priorities

14.0 The decision sought will help the Council meet the priorities of a making a difference for communities and for businesses by helping protect the character and appearance of Harrow Hill and by providing new facilities that may be used by some community organisations / local schools By undertaking consultation on the SPD (and making changes as necessary following the close of consultation) it is demonstrating that the Council seeks and listens to the views of those concerned. Overall, the Council and Harrow School will be working together to make a positive difference in Harrow.

Section 3 - Statutory Officer Clearance

Name: Jessie Mann	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 1 July 2015		
Name: Elaine Bell	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 11 June 2015		

Ward Councillors notified:	Yes
EqIA carried out:	NO – see 13.0
EqIA cleared by:	N/A

Section 4 - Contact Details and Background Papers

Contact: David Hughes – Planning Policy Manager, 0208 736 6082
david.hughes@harrow.gov.uk

Background Papers: Harrow School SPD (draft for consultation) 2015
(<http://moderngov:8080/documents/s127711/Appendix%201%20-%20Harrow%20School%20SPD.pdf>)