

Appendix A – Issues Raised and Council’s Response

The table below summarises the comments received during the consultation and provides the Council’s response.

Respondents Comments by Issue	Council’s Response
Zone B – Golf Course / Pitch and Putt Site	
<p>Objections - inappropriate use for Metropolitan Open Land due to coach parking and astroturfing</p>	<p>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 would be associated with the use of the site for outdoor recreation, and the coach parking itself would serve outdoor recreation across the estate (i.e. cricket pitches, rugby pitches etc). 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, would maintain the openness of the site and are associated with outdoor recreation, an appropriate use of MOL land. Design guidelines (Section 6) could be re-enforced to ensure design / layout takes into account MOL / openness. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Objections due to the impact on the areas of special character and amenity of replacing landscaped golf course with astroturf pitches and coach park</p>	<p>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</p>

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	<p>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. Any detailed proposals would need to be accompanied with landscape proposals, including the identification of trees to be retained, in accordance with Policy DM22 (Trees and Landscaping). Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Concern with regards to the impact upon traffic due to coach parking</p>	<p>A transport assessment would be required to accompany any planning application; this would 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. The school is proposing to commission and Estate-wide transport assessment that will consider all of the proposals in their entirety; reference could be made to this in the SPD. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Objection as there would be adverse impacts on Biodiversity as it is a site of importance for nature conservation and astroturfing and coach parking would conflict with this. Concern with regards to the loss of trees, which can also play a role in mitigating flooding</p>	<p>The draft SPD identifies biodiversity and the site's designation as a Site of Importance for Nature Conservation as considerations that would need to be adequately addressed when detailed application for planning permission is made. The highest quality biodiversity areas on the site are the vegetated areas on the boundaries of the site and there is scope for these to be retained and enhanced (through an improved management regime) as part of any detailed proposal. Design guidelines (Section 6) could be re-enforced to ensure design /</p>

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	<p>layout takes into account existing trees (particularly those on the perimeter of the site), as well as sustainable drainage principles. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Objection to the loss of the Café as it is a valued local business</p>	<p>The land on which the pitch-and-putt and café is leased from Harrow School, with the lease due to expire September 2019. 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 could be scope for the re-provision of the café as part of any building associated with the proposed all-weather pitches. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Objection to the loss of a valued public amenity and open space</p>	<p>Both the existing use of the site for a pitch-and-putt and the proposed use for all-weather playing pitches are 'outdoor recreation' uses that are appropriate within MOL, consequently there is no loss of open space. The site is in private ownership; however the proposed all-weather pitches would be made available for community use when not required for use by the School. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>

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<p>Objection as the proposed use could increase the risk of flooding on Watford Road due to extensive tarmacking</p>	<p>Consideration would need to be given to incorporating sustainable drainage systems into any detailed design for the pitches and surrounding area, in accordance with Local Plan policies DM9 (Managing Flood Risk) and DM10 (On Site Water Management and Surface Water Attenuation). Artificial pitches and coach parking can be constructed using materials that are permeable, thereby reducing the impact of the proposals on surface water flooding. Additionally, there is scope to include other sustainable draining measures within the site, such as swales and soakaways. Section 6 (design guidelines) could include specific reference to the design, layout and use of materials being required to take into account sustainable design principles. There is a significant level difference between Watford Road and adjoining part of the site. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Objection to floodlighting for the astroturf pitches due to amenity impacts and potential impacts on wildlife such as bats</p>	<p>The draft SPD does not include reference to floodlighting. Any application for planning permission involving floodlighting would be assessed against Policy DM48 (Enhancing Outdoor Sport Facilities), which indicates that 'proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity'. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Trees on boundary of site should be retained, and improvements made to the Watford Rd and</p>	<p>Any application would be subject to an arboricultural implications survey prepared under BS 5837:2012 Trees in relation to design, demolition and</p>

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<p>additional planting should take place to mitigate biodiversity loss and flood risk. Woodland management plan should be bought forward if astroturfing goes ahead.</p>	<p>construction – Recommendations. Implications for biodiversity would be considered against Policy DM20 (Protection of Biodiversity and Access to Nature), which identifies that the design and layout of new development should retain and enhance any significant existing features of biodiversity within the site. Section 6 (design guidelines) could make specific reference to retaining perimeter trees). Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>The change to astroturf and parking will adversely impact on the surrounding residential properties outlook and amenity</p>	<p>The overall openness of the site would be maintained, in accordance with the site's Metropolitan Open Land. The National Planning Practice Guidance (NPPG) makes it clear that 'planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations. Consequently, private views (i.e. outlook) are not a material consideration for planning applications. Amenity issues would be assessed when a detailed planning application was made. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD</p>
<p>Objection to the loss of the golf course use, as it is a unique community facility open to all.</p>	<p>Policy DM47 indicates that the loss of an existing sport facility will be permitted if there are adequate similar facilities within walking distance which offer equivalent. 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</p>

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	<p>(i.e. beginners etc) are outside the scope of the planning system i.e. does not have land use impacts. 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. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>Suggestion that adjacent playing pitches could be used for this proposal, with access from Watford Rd</p>	<p>Previous discussions regarding access off Watford Road have indicated that Transport for London would be reluctant to agree to such an access, particularly when there are other alternative access routes. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.</p>
<p>No need for coach parking on this site – Garlands lane could be widened and the School's car park at the bottom of this road is adequate</p>	<p>Garlands Lane has many of the planning designations that also cover the proposed location for the coach-parking (i.e. Area of Special Character, Site of Nature Conservation Importance, and Metropolitan Open Land). It however also has additional designations such as being included in a Conservation Area and an Archaeological Priority Zone and is therefore more constrained in planning terms. Additionally, it is likely to be difficult to physically accommodate the widening of Garland Road, particularly in the vicinity of existing buildings. The car park at the end of the road is unlikely to be able to accommodate a significant number of coaches, and manoeuvring would be difficult. It would also result in the loss of parking for cars and not have the benefits of locating the coach parking on the proposed sites, such as reducing the need for coaches to traverse the Hill. Notwithstanding this, in the context of the</p>

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	representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
High Street and Shared Surfacing Proposals	
Objection to shared surface concept as it would cause traffic congestion and could be dangerous	The draft SPD identifies a shared-surface arrangement as an option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals are taken forward. Shared surfaces are a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.
Objection to the text at 6.8 which proposes amending the 258 bus route to be replaced with a single decker service as this service is at capacity at peak times and would negatively affect residents, businesses and other Schools in the area	The draft SPD identifies potential changes to the bus routes running over the Hill as means of address traffic and pedestrian safety issues, with further investigation and consultation required before any proposals are taken forward. In response to broader concerns regarding potential changes to the highway and public transport within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways / public transport proposals throughout the document.
Support expressed for the principle of shared surfaces which could improve the environment and increase pedestrian safety	As noted above, the option for a shared surface arrangement was suggested as a possible means to improve the environment and pedestrian safety. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.

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<p>Objection to the text at 6.8 which explores the option for closure of the road to cars in one direction, only allowing for buses and other authorised vehicles as this would cause congestion elsewhere, and would deprive residents and businesses access to their properties. It would also result in dangerous road conditions due to people having to perform u-turns to get out of roads that would not have through access.</p>	<p>The draft SPD identifies partial closure of the High Street to cars in one direction as an option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Such an arrangement is a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.</p>
<p>Objection to the text at 6.8 which proposes the closure of the High St to traffic between West St and Grove Hill as this would cause congestion elsewhere, and would deprive residents and businesses access to their properties. It would also result in dangerous road conditions due to people having to perform u-turns to get out of roads that would not have through access</p>	<p>The draft SPD identifies closure of the High Street to traffic as one option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Such an arrangement is a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.</p>
<p>Shared surface concept could reduce parking in the area causing further traffic congestion issues</p>	<p>The draft SPD identifies a shared-surface arrangement as one option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Shared surfaces are a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. In response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.</p>

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<p>Branding of street furniture could lead to perceptions that the High Street is private, and could detract from the character of the area</p>	<p>In response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.</p>
<p>Support expressed for the reduction of the dominance of the car on the Hill, and for restricting access to public transport</p>	<p>Support noted. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document, but retain general comments regarding the need to improve pedestrian safety.</p>
<p>Suggestion that a subway could replace the existing zebra crossing, alleviating safe crossing issues and improving traffic flow</p>	<p>It is difficult to envisage how a subway could be accommodated within the school grounds / highways land as significant excavation would be required to construct the accesses to the subway. Such a structure would potentially have an adverse impact upon the heritage assets within the area. The existing zebra crossing serves both the public and school, whereas the subway is likely to only be able to serve the school as there is limited scope to construct subway entrances within the public highway due to the constraints outlined above. It would also be a costly measure that would not fully solve the issue. No change.</p>
<p>Suggestions that more road bumps, more pedestrian crossings and additional railings could improve safety, rather than closing or restricting access to the road</p>	<p>The draft SPD proposed a number of potential changes to the highway arrangements; this list however was not intended to be exhaustive and other options such as that suggested in various representations could be considered. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.</p>

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Sports Hall, Science Building and Music Auditorium - Metropolitan Open Land Swap - Zone A Proposal 1 and 4, Section 5.3	
<p>The principle of MOL swap should only be considered at a later date when a detailed design has been worked up, so as to assess the impacts – should be removed</p>	<p>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 could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. It is relevant to note that the area of potential 'swap' represents only a small fraction of the overall Metropolitan Open Land that covers the majority of the School Estate.</p> <p>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 is in general conformity with the London Plan'.</p> <p>Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.</p>
<p>Objection to the reconfiguration of MOL as it would not be of equal value and openness</p>	<p>The proposed reconfiguration of MOL will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself. It would be extensively landscaped and form part of the overall landscape structure of the site, thereby making a significant contribution to its openness. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-</p>

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	swap to be taken forward into actual reality. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL ‘land-swap’ and factors that will be considered.
Concern with regards to the loss of the Bowyer Webb Pavilion which adds to the unique character and history of the area	The Bowyer Webb Pavilion is not included within a Conservation Area, nor is it a statutory listed building, nor included on the Harrow Local List; it is therefore not a designated heritage asset. No change.
The configuration of the proposed replacement MOL land would not be open due to the modern languages block above it.	Viewed in its entirety, the proposed reconfiguration of MOL (including the removal of Peel House) will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself. This will form part of the overall landscape structure of the site, thereby making a significant contribution to its openness. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL ‘land-swap’ and factors that will be considered.
Land returned to MOL use from built use is unlikely to be of the same quality and even a greater area of such land would not compensate for this lack of quality and so this aspect of the SPD need revisiting.	The primary function of Metropolitan Open Land is its openness, rather than ‘quality’. The proposed reconfiguration of MOL will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself, thereby protecting the openness of that part of the site and its strong link with the top of the Hill. However, the ‘quality’ of the MOL will be enhanced, as it will be extensively landscape and form part of the overall landscape structure of the site. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL ‘land-swap’ and factors that will be considered.
The sports centre should be rebuilt on the same site with proper foundations this time (not relying on the mass of water for stability) and extra	Rebuilding the sports centre on the same site would be logistically difficult as it would leave the school and its external users without a sports centre during the construction period, which would be likely to be at least two years, significantly

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<p>storage space can be obtained by digging down into the hill. This brown field strategy will preserve Metropolitan Open Land (MOL).</p>	<p>impacting upon both the School and external users. Relocation of the sports centre allows for the central landscape core to be established. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL ‘land-swap’ and factors that will be considered.</p>
<p>Suggestions that new buildings should be built in the non MOL areas where there are already buildings, i.e. Peel House knocked down and rebuilt fit for a new purpose, such as the Music Auditorium. Its location is very close to other buildings with ready and efficient access to it</p>	<p>The removal of Peel House is part of the broader landscape proposal to create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the Hill itself; retention of Peel House / construction of a new building in this area would impact upon that proposed core central landscape. No change.</p>
<p>New Science building should be constructed on the site of Peel House, thus avoiding encroachment onto MOL, and would be closer to the existing classrooms</p>	<p>The New Science building is not located on MOL, so therefore its construction does not encroach on MOL. No change.</p>
<p>Landscape Core Proposal</p>	
<p>The view that would be created by opening up this landscape core should be publicly accessible</p>	<p>There are already established rights of way through the School Estate and the Harrow Local Plan protects a number of publically accessible views across the school (from the public highway). No change.</p>
<p>Objection to the loss of trees and landscaping in this area</p>	<p>Any detailed proposals will need to be accompanied by an arboricultural implications assessment. Existing trees and landscaping will be retained where possible and extensive new landscaping will be provided. Any potential loss of trees should be seen in the context of the significant tree coverage across the School estate. No change.</p>

Respondents Comments by Issue	Council's Response
New Entrance Building - Proposal 7 Zone A Section 5.3	
<p>Objection to locating a new reception area at the junction of West Street and the High Street. Suggest it is sited in Football Lane or Garlands Lane where the pedestrian and traffic movement is less intense.</p>	<p>The proposed location of the new entrance building is intended to assist in way-finding by creating a more obvious 'arrival point' for people visiting the school for the first time. The locations suggested in the responses are not visible from the main thoroughfares and are remote from the main school areas. Issues relating to the impact of the new building on pedestrian and traffic movements would be addressed when any detailed planning application is made. The new building is intended to provide better facilities than those existing, rather than representing an additional facility (i.e. it does not create additional trip generation). No change.</p>
<p>The new building's location could adversely impact on the character of the area and views on the hill</p>	<p>The design considerations identified in the SPD include the need for this proposed building to respond to the character of the area views on the hill; these guidelines could be further expanded-upon / strengthened to re-enforce this point. These issues would be addressed in detail when any planning application is made. No change.</p>
<p>Any new building on this site should be of traditional design</p>	<p>The SPD does not seek to be prescriptive with respect to the design style of any proposed buildings. Rather, it seeks to provide clear guidelines to what the design of any buildings should achieve. In the case of the proposed new entrance building, this includes responding to the unique site conditions and surrounding character and setting (context). Further text could be added to emphasis design / materials need to respond to context. Change – insert additional text in relation to design in context.</p>
<p>Suggestions that the new Entrance Building should be on land just off Watford Road, this would give an impressive entrance looking onto the Estate and would reduce congestion on the hill.</p>	<p>Previous discussions regarding access off Watford Road have indicated that Transport for London would be reluctant to agree to such an access, particularly when there are other alternative access routes. A location off Watford Road would also be remote from the historic heart of the School, namely along the High Street (the Speech Room, School Chapel, Vaughan</p>

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<p>Concern that the parking proposed to accommodate visitors (Proposal 9) is not timed to coincide with this development (phasing on page 44), and so would lead to parking problems and congestion on the High St.</p>	<p>Library). No change.</p> <p>The proposed new entrance building is intended to replace existing buildings and the draft SPD does not envisage the overall number of students at the school will increase. Consequently, the proposed new building itself should not generate a significant number of new vehicular movements. The car parking outlined in proposal 9 is intended to improve the existing car parking arrangements on site for visitors and does not necessarily need to be delivered at the same time as the new entrance building. Car parking arrangements will be considered in detail when formal planning permission is sought for the new building. Section 6 could be strengthened to ensure that car parking / access arrangements to the new entrance building have regard to any implications on the High Street. Change – add additional text to section 6 regarding transport / access / car parking arrangements.</p>
<p>Staff Accommodation Zone C</p>	
<p>The proposal for three new buildings for staff housing is far too vague and should not be allowed to stay in the document in such a format. Could just buy vacant properties on the hill. Building new accommodation conflicts with SPDs aim of minimising new buildings</p>	<p>The draft SPD seeks to identify the intention that additional staff accommodation is provided in this part of the site; the location already contains a large amount of staff accommodation. The draft SPD by its nature does not provide specific detail about the proposals; rather, it identifies the considerations that will need to be addressed when formal application is made for planning permission. This part of the site is relatively unconstrained with respect to new buildings, as whilst it is located within the Harrow Park Conservation Area, it is not located in Metropolitan Open Land, Site of Importance for Nature Conservation or the registered Harrow Park designation. References in the SPD to minimising the need for new buildings relates to ensuring the efficient use of existing academic and non-academic buildings on the site, before contemplating new buildings. No change.</p>

Respondents Comments by Issue	Council's Response
General Comments Not Site Specific	
<p>Concern over the loss of trees over the site, which would have negative impacts on biodiversity and the character of the Hill</p>	<p>The impact of any potential tree removal required to facilitate the development of the proposals contained within the draft SPD would be assessed when detailed application is made for planning permission. At an estate-wide level, proposals in the draft SPD have sought to minimise tree loss through the site-selection process and the future detailed, project-specific investigations will seek to minimise the loss of trees at an individual site level. Section 6 could be re-enforced to make reference to general requirements relating to trees under the Town and Country Planning (Tree Preservation) Regulation 2012. The School is already seeking to prepare a woodland management plan to cover vegetation across the Estate. Change – insert additional text regarding trees and landscaping considerations.</p>
<p>Fencing should be in keeping with the character of the area, and consistent with the traditional fencing currently used</p>	<p>There are two proposal specific references to fencing within the draft document. A general comment regarding fencing needing to be appropriate to its purpose and context could be inserted in the general design guideline section (i.e. section 6). Change – insert additional text regarding fencing in section 6.</p>
<p>SPD should mention public rights of way across the estate and how they will be maintained, protected and enhanced by the proposals nor what impact there will be upon them during the necessary demolition, building and other works and how any impact will be minimised and mitigated</p>	<p>The draft SPD repeats the site allocation description in the Site Allocations Development Plan Document (DPD), which makes reference to the rights of way that pass through the site and that 'proposals must have regard to the public rights of way, ensuring that these do not become obstructed and that the quality of the experience enjoyed by walkers is not diminished. Proposals requiring re-routing of public rights of way will not be permitted if this would lead to substantial diversions at odds with pedestrian desire lines through the land'. These requirements could be re-iterated in the general design guideline section (i.e. section 6) and the rights-of-way shown on Figure 2 (Designations). There are processes available under legislation to enable amendments to rights-of-way arrangements i.e. they are not necessarily fixed in-perpetuity and can be amended following due process. However, none of the proposals block rights-</p>

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	of-way. Change – additional text to be inserted in the document clarifying that the proposals do not block any rights-of-way and including these on Figure 2.
The SPD does not consider the needs of members of the public navigating public rights of way across the school estate and how to address the issue of assisting them to easily follow any chosen route by signposting, waymarking and eradicating physical barriers that have been erected over the years that impede their progress.	As noted above, the SPD repeats the site allocation description regarding rights of way. No change.
The proposed perimeter service road is unacceptable. This area is utilised by several public rights of way and such a road would be seriously detrimental to pedestrian use and amenity value of the route and of the MOL.	The proposals relating to the perimeter service road are limited to a realignment of the service road in the vicinity of the dining hall / kitchen service yard. This new section of road is intended to create a more direct route and remove the need for vehicles to pass through the proposed landscape core, thereby improving visual amenity and pedestrian safety, This section of new perimeter road will not adversely affect the rights-of-way. No change.
Given that much of the school grounds are covered by an Archaeological Priority Area additional references to archaeology should be included in paragraphs 2.10 and 6.1.	Noted. Paragraph 2.10 already makes reference to historic context, which includes archaeology. No change.
Paragraph 2.18, - it may be preferable to commission an over-arching desk based assessment for the masterplan to identify archaeological significance and potential, key issues, archaeological character areas and	Noted. This suggestion could be included in the draft SPD as an additional, alternative approach to undertaking assessments on a proposal-by-proposal basis. The School is already working with the Greater London Archaeology Advisory Service (GLAAS) on Estate-wide archaeological investigations. Change – additional text to reflect these points.

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<p>approaches for each specific proposal, instead of seeking individual archaeological assessments for each application site.</p>	
<p>In the policy considerations paragraph on page 28, the reference to 'character' could be replaced by the term 'setting' In relation to listed buildings. When considering the impact on conservation areas refer to 'character and appearance'. This will ensure that the terminology is clear and in keeping with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>Noted and agreed. Change – amend document as suggested.</p>
<p>The requirement for new buildings to have a contemporary design and 'fresh' materials is overly prescriptive. This approach is unlikely to be the most appropriate solution in all locations, particularly in the setting of heritage assets. Given the extensive heritage sensitivities around the school's buildings and landscape setting the references in paragraphs 6.1, 6.2, 6.5 and 6.7, should be modified to take greater note of the context when considering design solutions. This will allow flexibility for contemporary or traditional designs, depending on the circumstances of the site.</p> <p>In paragraph 6.1 for example you could say: "Make a positive contribution to the setting of the School through excellent contextual design."</p>	<p>It is not intended that the design elements of the SPD are prescriptive; it is accepted that some of the working in section 6 could be interpreted to be prescriptive, particularly when read in isolation to the rest of the section. Some minor amendments could be made to ensure the document does not read as being prescriptive. Section 6 already includes reference to 'contextually appropriate design', but further references could be added where appropriate.</p> <p>Change – amend document as suggested.</p>

Respondents Comments by Issue	Council's Response
<p>In paragraph 8.2 which refers to the implementation of the SPD, we would encourage you to include Historic England and GLAAS as pre-planning consultees for works affecting the significance of Grade I or II* listed buildings, significant demolition to any listed building, or which may affect archaeology on the site.</p>	<p>Noted and agreed. A general comment on other consultees (as appropriate to the specific proposal and location within the School) would be included. Change – amend paragraph to include reference to relevant statutory consultees.</p>
<p>In relation to the historic landscape, the term 'landscape setting' (1.11) is better than 'landscapes' (1.6). Similarly in paragraph 5.3 the term 'axial core' is unclear, and could be better described as 'a strong axis within a central core' in our view.</p>	<p>Noted and agreed with respect to landscape / landscape setting. 'Landscaped axial core' considered to be sufficiently clear in the context of accompanying maps and text. No change.</p>
<p>In order to optimise the works to the landscape, notably in paragraphs 6.1 and 6.2, the history of the formal garden merits research to understand if it is significant.</p> <p>Likewise, the school should monitor and record changes in the soft landscape estate such as plant diseases, as part of the works in bullet point 6, paragraph 7.2, to ensure the long term success of the landscaping works.</p>	<p>Noted and agreed; however no change to SPD necessary. No change.</p>
<p>Documents time frame is too long – establishing principles for development that may happen 15 years time is too short-sighted, these principles should be revisited every 5 years, and a review mechanism incorporated into the SPD</p>	<p>The SPD principles and design guidelines are not intended to be prescriptive; rather, they seek to elaborate on how the policies contained in the Harrow Local Plan will be applied to this specific site in the context of the school's proposals over the next 15 years. The SPD itself is a material consideration in determining planning applications, rather than prescribing the outcomes of any</p>

Respondents Comments by Issue	Council's Response
	<p>planning applications. Any 'changed circumstances' that warrant an alternative approach than that outlined in the SPD would be given appropriate weight in determining the planning application. The SPD already makes reference to a review-mechanism. The Harrow Local Plan itself is likely to be reviewed at least once, during the 15 year period and any changes to policies would supersede the SPD to the extent that there is conflict between the two. No change.</p>
<p>SPD should clarify exactly who will benefit from community access – will members of the public be able to use the new sports facilities</p>	<p>The extent of public access to facilities will differ for individual proposals, depending on their nature, location and the school's operational needs. The extent will therefore be considered when planning applications are made and in accordance with Policies DM17 (Beneficial Use of the Green Belt and Metropolitan Open Land) and DM48 (Enhancing Outdoor Sport Facilities). No change.</p>
<p>The following text should be added - <i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development</i></p>	<p>This is a standard response / request from Thames Water. Rather than being specific about one particular type of infrastructure (water and sewerage), it is proposed that the SPD be amended to make reference to ensuring appropriate infrastructure is provided to support the proposals contained in the document, as required by Core Strategy Overarching Policy Z (Required Infrastructure). Change – additional bullet point in paragraph 6.1 regarding adequate physical and social infrastructure.</p>

Respondents Comments by Issue	Council's Response
<p>The following text should be added - <i>It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.</i></p>	<p>This is a standard response / request from Thames Water. Given that parts of the site are subject to surface water drainage issues, a general comment regarding surface water drainage / sustainable drainage systems could be included in the SPD. Change – insert additional text regarding surface water drainage in section 6.</p>
<p>General comments regarding the legibility of the document, including:</p> <ul style="list-style-type: none"> ▪ Some of the maps not being particularly clear. ▪ References to buildings / locations within the school may not be clear to those not familiar with the school. ▪ Conservation areas not shown on Figure 2. ▪ Area of Special Character not defined. ▪ Appendix A considered superfluous ▪ Site of Nature Conservation Importance for Area B (Pitch-and-Putt Golf Course) not sufficiently addressed in sections 5 and 6 ▪ References to Harrow Park being 'listed' when it should be referred to as 'registered'. ▪ References to 'Harrow Park' unclear – does it refer to the open space / park, or the road called 'Harrow Park'. ▪ Proposed relation 5-a-side pitch location not clear with respect to being 'adjacent' to Harrow Park ▪ Location of new entrance building not clear 	<p>Additional effort will be made to improve the clarity of mapping in the final document, including inserting an additional map of the school buildings.</p> <p>Conservation Areas are shown in Figure 3, along with statutory listed and locally listed buildings.</p> <p>Area of Special Character could be defined where it is first referred to in the document, with reference to Development Management Policies Local Plan.</p> <p>Appendix A is considered to provide historical context to the proposals and the School's management of its built and environmental assets for over 400 years.</p> <p>The status of Area B as Site of Nature Conservation Importance is referred to in section 5; reference to biodiversity could be included in section 6.</p> <p>Registered Parks and Gardens are added to the National Heritage List for England (NHLE), which contains the full range of nationally designated heritage assets such as listed buildings, scheduled monuments etc. Consequently, it is correct to refer to them as either listed (i.e. on the List), or registered.</p> <p>References to Harrow Park are generally clear when read in context, but could be further clarified.</p>

Respondents Comments by Issue	Council's Response
	<p>The locations of the relocated 5-a-side pitch and the new entrance building are shown on Figure 6 (Indicative Proposal Areas).</p> <p>Partial change: insert additional text as outlined above.</p>
<p>Principle and function of a Supplementary Planning Document</p>	
<p>Queries as to why an SPD had been prepared and concerns regarding the implications of the document being adopted with respect to future planning applications.</p>	<p>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 <i>on specific sites</i>, 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) and therefore additional guidance provided by the SPD is considered beneficial.</p> <p>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. Concern that adopting the SPD implies 'automatic approval' of subsequent planning applications is unfounded.</p>

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	<p>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, can occur notwithstanding the SPD process (a number of representations expressed concern in this regard). Change – insert additional text in section 1 under 'Status of the Document'.</p>
<p>Many responses also queried the role of the Council in the process given that the SPD is essentially as masterplan for the School's estate.</p>	<p>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 the School's estate. No change.</p>
<p>Some comments suggested that the SPD should have covered the entire Hill area</p>	<p>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. No change.</p>
<p>Consultation Arrangements</p>	
<p>Notification letters should have been sent to individual properties on the Hill.</p>	<p>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</p>

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	<p>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.</p> <p>The Council initially sent letters to contacts on its Local Plan database, which includes a number of residents' associations on the Hill (although this list is not exhaustive). No change.</p>
<p>There was insufficient publicity undertaken at the start of the consultation period to ensure that all relevant people were aware of the consultation.</p>	<p>The consultation arrangements put in place at the beginning of the process met and exceeded statutory requirements. Additional measures were put in place, including the period being extended to 31 May 2015 (a further four week), an additional drop-in-session was organised, public notices were placed on lampposts on roads surrounding the School's estate, and notifications were delivered to properties on Harrow Hill within the vicinity of the proposed development locations outlined within the SPD. No change.</p>
<p>A second round of consultation should be held on the proposed amendments to the document in response to the representations.</p>	<p>A second round of consultation on the amendments is not required by the Regulations, but respondents are advised of the outcomes of the consultation and the Council's response. No change.</p>