

# GREATER LONDON AUTHORITY

## Development, Enterprise and Environment

**Mongezi Ndlela**  
Senior Planning Officer  
Harrow Council  
Planning Services  
Civic Centre  
Station Road  
Harrow HA1 2UY

**Our ref: D&P/3820/TT02**  
**Your ref: P/1940/16**  
**Date: 27 June 2016**

Dear Mr Ndlela,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.**

**Harrow School Sports and Science Buildings, Harrow-on-the-Hill, Harrow HA1 3A**  
**Local planning authority reference: P/1940/16**

I refer to the copy of the above planning application, which was received from you on 16 May 2016. On 27 June 2016, the Mayor considered a report on this proposal; reference D&P/3820/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not fully comply with the London Plan, for the reasons set out in paragraph 86 of the above-mentioned report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, a statement of any conditions the authority proposes to impose and (if applicable) a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.



Please note that the Transport for London case officer for this application is James Dyson, e-mail: JamesDyson@tfl.gov.uk, telephone: 020 7126 4868.

Yours sincerely,



**Colin Wilson**

Senior Manager – Development & Projects

cc Navin Shah, London Assembly Constituency Member  
Tony Devenish, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL  
Rivington Street Studio, 23 Curtain Road Shoreditch London EC2A 3LT



27 June 2016

## **Harrow School, Harrow-on-the-Hill**

**in the London Borough of Harrow**

**planning application no. P/1940/16**

### **Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### **The proposal**

Demolition of existing buildings and construction of new sports and science buildings.

### **The applicant**

The applicant is **Harrow School**, the agent is **Paterson Planning & Partners Ltd** and the architect is **Rivington Street Studio**.

### **Strategic issues summary**

- **Land use principle:** Whilst the school redevelopment on **Metropolitan Open Land** is 'inappropriate' development, the proposed MOL swap, resulting in a net gain of MOL combined with the pressing academic needs and enhanced community use, are accepted as **very special circumstances** justifying the proposal, in this instance. (Para 36 – 43).

### **Recommendation**

That Harrow Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, for the reasons set out in paragraph 86 of this report. However, the remedies set out in that paragraph could possibly lead to the application becoming fully compliant with the London Plan. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

## Context

1 On 16 May 2016 the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 24 June 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *"Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building."*

3 Once Harrow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 Harrow School is located in a prominent position on Harrow-on-the-Hill near the southern edge of the London Borough of Harrow. The School Estate covers approximately 122 hectares and approximately 84% of the Estate is located within Metropolitan Open Land. Whilst the proposed site for the new sports building is in the MOL, the proposed site for the new science building is outside the MOL, but within a conservation area.

6 The School Estate is bisected by the High Street along which the main school buildings are located. The High Street is a public highway and a bus corridor with the School built on both sides of the road. The existing Science block (Biology and Chemistry Schools) is located on Football Lane adjacent to its junction with Peterborough Road. The Sports building is accessed for vehicles via Garlands Lane located to the north of Football Lane from Peterborough Road. Pedestrian access is however also provided via Football Lane.

7 The site is remote from the nearest point of the Transport for London Road Network (TLRN); Western Avenue/A40 being 5.2km to the south. The nearest section of the Strategic Road Network (SRN) is Bessborough Road/A312, located approximately 550m to the west. There are two bus routes (258, H17) that serve the site from stops on High Street, located approximately 345m away from the site. These buses run at an average frequency of 4 buses per hour. The nearest London Underground station is Sudbury Hill, located approximately 2km to the south of the site. The station is served by the Piccadilly Line, providing a fast and frequent service into central London. As a result, the public transport accessibility level (PTAL) of the site is 1b; based on a scale of 1a to 6b, where 1a is lowest and 6b is highest.



*Aerial view of Harrow School in context: Source – applicant's design and access statement, April 2016.*

## Details of the proposal

8 The application seeks full planning permission for:-

- Demolition of existing buildings including the existing sports centre building, the old Headmaster house, a gardeners compound, and ancillary pavilions;
- The development of a new Sports Hall;
- The development of a new Science Building;
- A new Core Landscape incorporating safe, off-street pedestrian route for pupils, staff and visitors in and through the heart of the school and from the Chapel Terrace to the Athletics Track;
- Re-location of Multi Use Games Area;
- Improvements to the Dining Hall Service Area including screening, rationalisation of parking and re-routing of pedestrian routes away from the service yard area; and
- The creation of new disabled and visitor car parking on Football Lane.

9 The applicant has also proposed a land swap in regard to the MOL, in line with the Harrow School SPD (2015).

## Case history

10 On 8 December 2015, a pre-planning application meeting was held at City Hall, comprising the applicant and its consultants and GLA officers and subsequently an advice report was issued. From the pre-app meeting it was concluded that the proposed school redevelopment would be supported provided the strategic matters raised in regard to land use principles- provision of education facilities on Metropolitan Open Land, playing fields & community use, biodiversity, urban design, inclusive design, sustainable development-energy, flooding management and transport, are taken into consideration and fully addressed before the application is submitted to the local planning authority.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Education *London Plan; Social Infrastructure SPG;*
- MOL *London Plan;*
- Playing fields *London Plan;*
- Biodiversity *London Plan;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG replacement;*
- Community use *London Plan;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Flooding *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force are the 2012 Harrow Core Strategy, the 2013 Development Management Policies Local Plan and Site Allocations Local Plan, and the London Plan (Consolidated with Alterations since 2011).

13 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, the Mayor's Social Infrastructure SPG (2015), and the Council's Harrow School Supplementary Planning Document (Adopted, July 2015) are also relevant material considerations.



Development proposals site strategy: Source- applicant's design and access statement, April 2016

## **Land use principles: provision of education facilities on MOL**

14 Since its formation in 1572, Harrow School has expanded, developed and adapted to meet the demands of its changing academic and accommodation requirements. The School is an independent full boarding school for boys aged 13 to 18 in which 828 pupils are currently registered (circa 20% from outside the UK). The boys all live on site as full boarders in 13 boarding houses. The School is one of the larger employers in the borough with a current staff of circa 600. All of the 104 core teaching staff members live on site.

15 In relation to the provision of educational facilities, policy 3.18 'Education facilities' of the London Plan states that *"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes"*.

16 The above policy states *"The Mayor will support provision of early years, primary and secondary school and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance. ...Development proposals which enhance education provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes."*

17 The Mayor's Social Infrastructure SPG (2015) provides guidance on planning for social infrastructure provision at strategic level starting with the GLA's own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities.

18 Para 72 of the NPPF states *"The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen the choice of education. They should give great weight to the need to create, expand or alter schools."*

19 The London Plan (policy 7.17) gives the MOL the same level of protection as in the Green Belt, and the National Planning Policy Framework (paragraph 89) sets out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the Green Belt. All other forms of development are, by definition, 'inappropriate'. In order for 'inappropriate' development to be acceptable in the MOL, very special circumstances must apply.

20 Furthermore, bullet point 6 of the above paragraph in relation to previously developed land states that *"complete redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt"* may be an acceptable development on the Green Belt. Alternatively if it does not meet these criteria it is assessed as 'inappropriate' development, which needs to be justified by very special circumstances.

21 Harrow School is located within a Metropolitan Open Land, Conservation Areas, a Site of Importance for Nature Conservation (SINC), an Archaeological Priority Area. The School site has listed buildings and is within locally protected view as set out in Harrow Council's 'Historic Views Assessment'.

22 Whilst the site of the proposed Science building is not in MOL, the sites of the existing Sports building, and the site of its proposed replacement, lie within MOL. The replacement Sports facility is proposed to be enlarged. As stated in the planning statement, the applicant has acknowledged that the increase in both floor space and footprint means the new sports building does not meet the

criteria of bullet point 6 of paragraph 89 of the NPPF and must be considered, as 'inappropriate' development within MOL.

23 At the pre-application meeting, GLA officers advised that the proposed new Sports Centre triggers very special circumstances policy tests by virtue of its nature and scale, and could not be considered to be 'appropriate' development within MOL. Officers have also advised that despite the increased academic curriculum need and the potential for increased community use, *these alone* are unlikely to amount to 'very special circumstances' (Vis a Vis Para 89 of the NPPF). The applicant has noted that this was also the view taken by the School and Harrow Council in their drafting of the Harrow School Masterplan SPD. However, the applicant stated that "in recognition of the fact that there are no suitable sites for provision of a new Sports Building outside of MOL, and the pressing academic need for the expanded provision, the SPD therefore agrees 'in principle' to a MOL swap."

24 MOL swap: The planning statement states that the swap involves the site area of the proposed new Sports Building, which is currently in MOL, for the area created by the new landscaped core, which is currently not in MOL but is within the Harrow School Conservation Area. This has been agreed at least in principle between the applicant, Harrow Council and the GLA during the preparation of Harrow School SPD development, (and referenced in pages 26 & 27 of the SPD, and see also the MOL swap diagram in appendix 1.)

25 The applicant has quoted from the SPD that the acceptability of the MOL swap is subject to the following criteria being met; and has argued that the current application successfully meets all these criteria:

- There will be no net loss in the amount of MOL;
- The reconfiguration will deliver a coherent and contiguous expanse of MOL;
- The new MOL would be equivalent or greater quality; and
- Openness will be maintained.

26 No net loss in the amount of MOL: The applicant demonstrates that the existing Sports Centre and ancillary buildings have a footprint of 1,750 sq.m., which are all proposed to be demolished, and the land returned to MOL. The area of the proposed new landscape core, which will be swapped into MOL, amounts to a total area of 8,695 sq.m. So these two elements together total an area of 10,445 sq.m. The proposed new Sports Building will require an area of 5,480 sq.m. on MOL. Therefore the swapping process will result in a *net gain* of 4,965 sq.m. of MOL.

27 A coherent and contiguous expanse of MOL: The applicant states that the areas to be swapped are next to each other on the hill. The creation of the new landscaped axial core will create a new coherent expanse of MOL running from the back of the Chapel right down the hill, linking in with the existing expanse of MOL at the bottom and beyond, facilitated by the removal of a number of buildings, including Peel House and a gardener's compound. The swapped-in land will therefore continue to form a contiguous and coherent expanse of MOL.

28 Quality of the New MOL: The applicant points out that the proposed MOL swap will have a positive impact on MOL openness. The removal of existing buildings from within the existing MOL (i.e. the existing Sports Centre and a number of ancillary buildings on the playing fields), and returning these areas to open MOL, will improve the openness of the existing MOL. Further, the opening up of the hill through the creation of a new landscaped axial core, and the removal of buildings to enable this, will open up the top of the hill to the wider MOL at the bottom of the hill improving the openness of MOL in this area visually, physically, and functionally. This is illustrated in the Visual Impact Assessment that accompanies this application. (See below appendix 2).

29 The applicant reiterates that the design of the new Sports Building has been carefully considered to work with the topography of the hill, allowing for much of the massing to be buried into the hillside, resulting in modest building heights staggered along the hill's natural gradient. The pre-application advice from the GLA confirmed that, in terms of scale, height and massing, the proposals do not give rise to concerns about the impact on the openness of MOL. The MOL swap, and the impact on openness, should also be considered in the context of the whole expanse of MOL on the eastern side of the hill, which amounts to 793,343 sq.m. In this context, the reconfiguration of the MOL boundary represents a very minor amendment, and is on the edge of the MOL boundary. Therefore, the applicant considers that a swap of the quantum proposed in this location could not be said to adversely impact on the openness of MOL on the eastern side of the hill.

30 Impact on Openness: The applicant points out that the area of MOL to be swapped out is not functionally useful and is of average quality in terms of landscaping. The area to be swapped-in is within an area of significance within the School, forming the setting to a number of historic and important school buildings within the heart of the academic core. The proposal for the new axial landscape core will see this area significantly enhanced in terms of landscape quality. The new MOL will therefore be of a greater landscape and functional quality than the area it replaced. Further, the applicant asserts that quality of the existing MOL will also be improved through the removal of existing buildings and reinstatement of landscaped areas consistent with the surrounding MOL. (See appendix 3).

31 In light of the above, the applicant concludes that the swapping arrangement achieves all of the policy tests agreed in the Harrow School Masterplan SPD, and that the acceptability of the MOL swap, alongside the significant planning constraints experienced across the estate, the pressing academic needs, and the proposed enhanced community use, all combine to constitute very special circumstances justifying the 'inappropriate' element of the proposed Sports Building redevelopment.

32 The applicant further suggests the following conditions reiterating as set out in the Harrow School SPD, the MOL swapping and designation will, initially, need to be secured through a condition or s106 agreement, until such time as the Council undertakes to update its Proposals Map. A draft clause to this effect is therefore provided for the Council's consideration and is stated as follows:

- Immediately following occupation of the new Sports Building, the Governors of Harrow School will formally apply to the London Borough of Harrow to have the Land Registry Title Deed for the School amended to show that the land identified as Parcel A is to be designated Metropolitan Open Land, and that the Metropolitan Open Land designation, applying to the land identified as Parcel B, is extinguished.
- Such arrangements on the Title Deed will remain in place until such time as the London Borough of Harrow undertakes to update its Proposals Map to formally reflect the above change.

33 Increased Academic Curriculum needs: The planning statement states that, to continue its legacy, Harrow School must continue to evolve and grow as it has always done, to meet the educational needs of its pupils and to maintain its status as an educational institution.

34 The New Science Building: The statement reiterates pointing out that the new Science Building is required to meet the increasing demand for science subjects. The existing facilities are out-dated and lack sufficient teaching space and modern laboratories required of the new curriculum. Their current location, in Grade II listed building, means that further adaptation and expansion of the existing facilities is not feasible. Additional and more appropriate teaching space is therefore required for these science subjects in light of the current shortfall of adequate provision.

35 **The New Sports Building:** The statement sets out that the new Sports Building facilities will replace all the existing ones, adding several new features, including field changing provision, classroom teaching space, a training pool, studio/judo dojo space, and an additional; sports hall accommodating basketball. The new facilities, and enlargement to existing facilities, such as the fitness and performance suites and wet and dry changing provisions, are required to meet the current curriculum needs of the School, in all its modernization program, which are not being met by existing facilities, and to continue to support the role of the School as a provider of enhanced community facilities.

**GLA officers position on land use principle and the proposed MOL swap:**

36 As discussed above, the Sports Hall redevelopment on MOL is 'inappropriate' and the applicant is required to demonstrate very special circumstances that justify the proposal.

37 As part of general engagement on the Harrow Local Plan, GLA officers have discussed the principle of a reconfiguration of MOL at the Harrow School site in order to enable Harrow School to sensitively redevelop in response to its future needs. To this end the Harrow School Supplementary Planning Document (SPD) seeks to provide a practical framework for the School to modernise and enhance its educational facilities in a way which maintains and enhances the reputation of the school, and conserves the significance of the institution's unique historic and landscaped setting.

38 An exchange of land within the Metropolitan Open Land (MOL) designation is proposed within the SPD in order to facilitate the delivery of improved facilities for the school, along with the removal of various existing (non-Listed) buildings. This is set out in pages 27 & 29 of the adopted SPD.

39 The SPD nevertheless emphasises that such a "land swap" would be subject to a set of criteria as discussed above including a detailed demonstration of the openness of the proposed core landscape area, having regard to the cumulative impact of existing buildings and those proposed to be removed or constructed within or in the vicinity of the proposed MOL. Moreover, the SPD makes clear that there must be 'no net loss in MOL or in the quality of openness'.

40 As discussed above the applicant has demonstrated a detailed assessment of the cumulative effect of the existing, removed and proposed buildings within and adjoining the new landscape core on its openness, it is proposed that the landscape core will be designated as Metropolitan Open Land (MOL), preserving its openness. The new MOL will provide for an extension to the existing MOL on the Hill, and will provide an off-set to the swapping out of MOL to enable the development of the new sports building.

41 The detailed assessment has ensured that there is no loss in the amount or quality of MOL. Indeed, based on the indicative site boundaries, taking into account the fact the existing sports hall (which is currently in MOL) would be demolished and returned to MOL, plus the new landscape core, which will be swapped into MOL would result a net gain of 4,965 sq.m. of MOL. To this effect, the applicant has drafted a clause and provided for the Council's consideration that the MOL swap would be secured through a section 106 agreement until such time as the Council undertakes to update its Proposals Map.

**Conclusion**

42 In light of the above assessment and on the site visit appraisal, GLA officers consider the MOL swapping arrangement to be well considered and with a net gain in footprint, with equivalent or greater MOL quality, and a more functional and open landscaped area. Therefore, GLA officers consider that the MOL swap is acceptable. The proposals are in line with Harrow Council's SPD; subject to community uses of these new facilities being secured through S106 agreement and to

these facilities being the subject of regular review by Harrow Council, in order to ensure the facilities are available at an affordable rate.

43 The MOL land swap arrangement, alongside the significant planning constraints experienced across the estate (steep topography, conservation area, listed buildings and protected historic views, the lack of alternative suitable land), the pressing academic curriculum needs, and the enhanced community use (discussed below), *all combine* to constitute very special circumstances justifying the 'inappropriate' element of the proposed Sports Building redevelopment on MOL. The proposal is supported.

### **Playing fields & community use**

44 The London Plan (3.18E) expects community use to be maximised. As noted above, this is also being used as a case for justifying the redevelopment on MOL.

45 The planning statement states that the existing Sports Centre and other sports facilities in the school are accessible to community groups, local schools, sports clubs and the public at specific periods throughout the day. Currently, 12 local schools, 3 external clubs, and 13 organisations use the Sports Centre. Other schools also use the sports facilities for competitions, galas and sporting events. In addition, Harrow School Sports Club (HSSC) is the membership body that provides access for the public to the School's Sports Centre. The current number of HSSC members is over 1,060, including 280 school staff members. Membership includes use of the fitness suite and the swimming pool alongside other benefits such as group exercise classes, badminton and a discounted facility hiring. Therefore, Harrow School already enjoys excellent partnerships with a number of local schools and organisations and it is also noted that many elite national and international teams are attracted to train at Harrow School because of the quality of its 1st XV pitch and wicket, as well as its close proximity to Wembley Stadium.

46 Enhanced community use: The planning statement reiterates that the new Sports Centre with its enhanced capacity, greater and more appropriate changing provision, vastly improved circulation, and larger foyer will be much more suitable for external use. The School has already drafted a Community Use Offer (CUO) and envisages the new Sports Building providing an additional 450 hours per year of community use bringing the total hours of community use to over 860 hours per year. In addition, the CUO includes the potential for the new facilities to host larger one-off community events such as the qualifiers for the London Youth Games, as well as facilitating the training of local sports coaches, including teaching certain qualifications.

47 Community use agreement: The planning statement states that the intention is that this Community Use Offer will, in due course, be converted into a community use agreement and thereafter be subject to an annual review by representatives of Harrow School, Harrow Council, and Harrow School Enterprises Limited and may be altered by mutual agreement as required. The review is to take place at least 3 months prior to the beginning of the following academic year.

48 Charges: The statement states that financially the School will need to charge external users to cover the cost of running and maintaining the facilities. The School recognises that well programmed usage of the new sports facility has the added bonus of offering a sustainable business plan that may enable the School to subsidise the activity offered to some local schools and local organisations. The level of charge will depend on the facilities needed and whether provision is for multiple, dual, or exclusive use. In line with some similar private schools with substantial sports centres offering significant community access, the proposed 'At Cost' rate inclusive of labour is 40% of the commercial rate.

49 Summary: Whilst the School's commitment for community use agreement is welcomed, the applicant should continue its engagement with the local community, nearby schools and sport clubs

in the production of the community use plan, which demonstrates the extent of proposed community use of the facilities, in a form that can be secured by the Council to ensure delivery. The design of the school should also assist in this, for example by creating zones where community use can be easily be provided (for instance the School Hall, the football and golf pitches), while ensuring that access to other parts of the school can be easily prevented or segregated.

## **Biodiversity**

50 As part of the application site is designated as a Site of Importance for Nature Conservation (SINC), the majority of the application site itself is a high value for biodiversity, consisting largely of short mown grass. The applicant has submitted an updated Phase 1 Ecological Survey which states that the only protected species potential present in the proposed Sports and Science development footprint are bats and nesting birds. It is thought unlikely that great crested newts will be present due to the unsuitable habitats in this specific area.

51 The Ecological Survey demonstrates that the vast majority of the great crested newt population at the Harrow School Estate will be present without a doubt within Newlands Wood, the connecting woodland pockets and fringes, especially if near to the newt breeding pond e.g. Deyne Court which is adjacent to the wood. With reptiles such as grass snake and slow-worm, it is very unlikely these species will be present in the development footprint, due to a lack of suitable habitat. But a cautious approach is still required e.g. awareness by contractors at all times, as it is now understood, since the November 2014 survey, that these reptile species are present at a very low density on the wider Harrow School Estate. Bats will no doubt be foraging in the survey area and will be aware of the buildings with external bat roost potential at the very least as well as the high quality trees with woodpecker holes. So the possibility of the occasional bat roost being present or not within the development footprint will be clearer after further investigation. Currently, the potential impact level: Low/Moderate – but will be revised after the specific follow-up bat emergence survey has been completed.

52 The Ecological Survey recommends the following mitigation measures:

- Requirement for a bat emergence survey of selected buildings and trees, a follow-up bat emergence survey is needed of the buildings identified with genuine bat roost potential.
- Continuation of short grass mowing regime within the development footprint,
- Great crested newt impact avoidance strategy for the development footprint,
- Implement best practice guidelines in regards to nesting birds within all work areas,
- Implement best practice guidelines in regards to tree felling and bats,
- Implement best practice guidelines in regards to bats and demolition works, and
- Installation of suitable bird boxes and bat boxes as a compensation measure.

53 Tree loss mitigation: The Survey states that the proposed redevelopment results in the loss of 92 trees. 188 existing trees are being retained (with adequate protection to BS 5837:2012 'Trees in Relation to Construction' guidelines). No Category A - trees are to be affected; 29 Category B trees are removed; and 63 Category C trees are removed. 4 trees (3 Category B, and 1 Category C) have been identified by the arboriculturalist as being suitable for transplanting, and suitable locations will be found for these within the Core Landscape. Overall, 266 trees are proposed to be planted as part of the Core landscape project, which is more than a ratio of 3 new trees for every 1 tree removed. This is welcomed and needs to be conditioned.

54 In line with policy 7.19 of the London Plan the proposed redevelopment wherever possible, should make a positive contribution to the protection, enhancement, creation and management of biodiversity. The proposed implementation of best practice guidelines including the mitigation measures as outlined above will minimise the adverse impact of the proposed redevelopment on biodiversity. This is supported and welcomed and need to be conditioned.

## **Urban design**

55 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London.

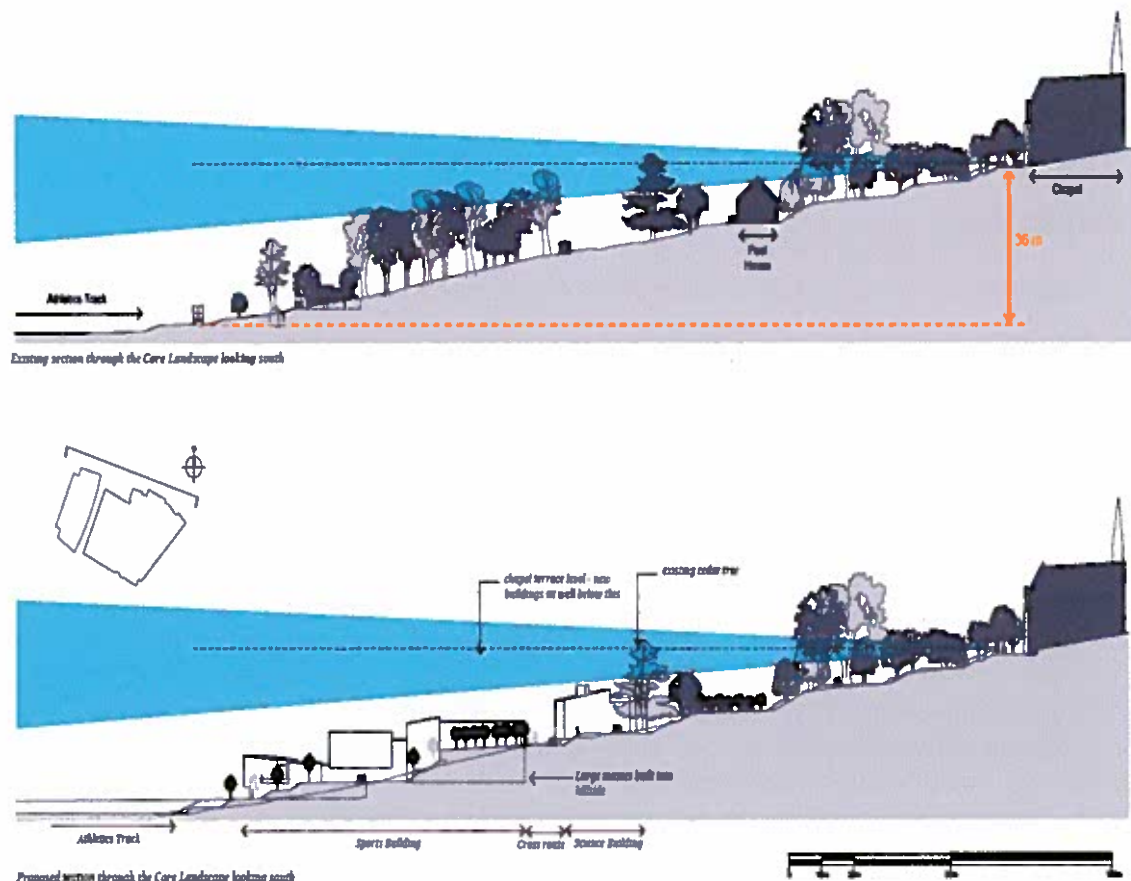
56 The applicant has undertaken a site location options analysis which indicates how the preferred location presents the most appropriate siting of proposed blocks in terms of utilising the topography, relative ease of public access and also being within the existing Harrow School campus. This location is recognised by GLA officers as being the most appropriate, given the site constraints described as part of the submitted options analysis. It is noted that the proposed science block is located within the conservation area and the sports hall within the MOL. The applicant has however worked to achieve an appropriate balance between meeting the sizing requirements of proposed facilities while pursuing a sensitive design approach that seeks to enhance the setting of nearby listed buildings as well as the formal landscape of the School campus. A key benefit is that the alignment of the two blocks front directly onto and defines an east/west axial route which provides a formal framework for the wider campus, including axial views to the east from Chapel Terrace garden.

57 The applicant has provided a clear indication of a hierarchy of pedestrian, shared and vehicular routes through the campus which is welcomed and this demonstrates that the proposals will enhance and improve on the current access arrangements by providing inclusive and legible pedestrian routes between the key buildings of the campus. This is welcomed and supported.

58 In terms of the proposed extent of development in this heritage sensitive location within MOL, GLA officers note that the footprints of each block are a departure from the existing pattern and grain of other campus buildings. However, the gradient of the slope means that views of the proposals will be limited in general with the southeast elevations being the most prominent in views from the opposite side of the sports track. While officers acknowledge that from this vantage point in particular, the setting of the conservation area will be altered, the simple, appropriate scaling of blocks and use of high quality and muted facing materials means that no harm will occur to its setting or that of neighbouring listed buildings. In regards to any impact on the character of MOL, officers are content that the proposals will appear as an integral feature of the wider school campus and would have limited impact on its open character as a result. Furthermore, and as discussed above in detail, there will be a net gain of footprint from the MOL Swapping, which is supported.

## **Visual impact assessment**

59 As shown in Appendix 1 and the diagram below, the proposals for both buildings will not have a cumulative visual impact of more than a 2-storey building in the context of utilising the site's 36m natural slope and they are to be built deep into the hill and staggered down the hill. Therefore, the impact on the openness of the MOL is very limited. However, the treatment of the roofs of the buildings needs to be considered as their impact from the top of the hill down to the south should be minimised.



*Illustration of the steepness of the natural slope of the site: source – applicant’s planning application documentation, April 2016.*

60 **Conclusion:** GLA officers are supportive of the proposals and welcome the sensitive design approach undertaken which successfully balances site constraints with the need to address relevant national and international independent schools standards including minimum teaching/circulation space standards, passive ventilation, daylighting and acoustics, as well as a high quality architectural response to the site's immediate and wider context. The Council is nonetheless encouraged to secure key details such as window reveals and samples of all facing materials and the treatment of roofs through appropriate conditions.

## **Inclusive access**

61 The applicant has submitted a design and access statement and points out that the proposals set out below have been discussed and agreed in principle with Harrow Council Building Control. They aim where ever possible to meet the minimum requirements of the Building Regulations Part M, Equality Act 2010 and the Code of Practice BS 8300: Design of Buildings and their Approaches to Meet the Needs of Disabled People. In addition, where possible, the Sports Building refers to the requirements of Sports England Accessible Sports Facilities 2010.

62 **Pedestrian access and circulation:** The statement sets out that the design avoids the use of ramps on the hillside as the levels do not offer themselves to this solution and a gentler slope is more inviting for all users. The new buildings offer a unique opportunity to travel around the lower part of the hillside unaided, by linking key levels and providing lifts within the buildings themselves. Wheelchair users will not be able to travel from the bottom of the hill to the Chapel located at the top of the hill through the proposed core landscape - this is no worse than currently. They will, however, be able to travel unassisted from Level 0 of the sport building to the upper level of Science, Level 5, therefore halfway up the hill. Once inside the main doors of the new building a spacious reception area will

contain a desk which has a DDA height counter. The circulation strategy within the building has been developed so that all parts will be wheelchair accessible. 2 no. passenger lifts offer access between Level 0 and 1, and then between Level 1, 2 and the western entrance linking towards the cross route. Circulation within the building is logical and the layout of the building easy to orientate. All corridors are a minimum of 1.8m wide in order to ensure adequate passing width.

63 Teaching spaces and lecture theatre: The statement points out that each teaching space is flat floored with an area of loose desks which allow for potential use by a wheelchair user. In the event of a disabled pupil at the School, the lab benching could be amended to suit a wheelchair user. The level 3 lecture theatre offers level access to and from the foyer and from the WC lobby at the front of the room. Locations for wheelchair users are available at the front of the room, which has direct access to the disabled toilets.

64 Toilets, changing rooms and swimming pools: The statement demonstrates that in total there are 6 disabled toilets within the Sports Building and 3 within the Science building. In the Sports Building, 1 no. disabled toilet is provided on each level so that no toilets are located further than 40 metres away from a fixed station such as a desk, seated viewing area or classroom. The main swimming pool is provided with easy access steps and a pool hoist. The training pool will be accessible either by the use of a pool hoist or the movable floor providing level access into the pool tank.

65 Parking: The statement points out that the existing site currently offers only 3 accessible parking spaces outside the Sports Building which are too narrow to meet current standards. There are no spaces within the main visitor car park at the bottom of Garlands Lane. As part of the creation of new disabled and visitor car parking on Football Lane, the proposals provide 6 new accessible parking bays. A number of parking bays are still available along the High Street and the redevelopment proposals have no impact on these. Drop off-points are also provided at Level 0 and from the Level 1 piazza into Sports, offering wheelchair access points to all levels of the Sports Building.

66 Conclusion: Given the topography of the site (36m natural slope), it is acknowledged that incorporating inclusive access is extremely challenging. However, as discussed above, the applicant has committed to provide wherever possible to meet the minimum requirements of inclusive design, which is supported and welcomed. The proposed measures need to be conditioned.

## **Sustainable development - energy**

### **Energy efficiency standards**

67 A range of passive design measures are proposed to reduce the carbon emissions of the proposed development including efficient Specific Fan Power (SFP), LED lighting and PIR controls. The demand for cooling will be minimised through enhanced insulation to the DHW pipework, fins along the science building's facade, a thermally massive structure assisted by the building being built into the hillside, high ceilings and openable windows, roof lights and ventilation chimneys for enhanced natural ventilation. The applicant is additionally proposing, where cooling is required, that it is provided using water abstracted from an onsite borehole, allowing for 'free'-cooling, and no chiller systems. This is welcomed and supported.

68 An overheating analysis using thermal dynamic modelling has been undertaken to assess the overheating risk within the conditioned areas of the building; its results demonstrate that a number of room spaces pass when assessed against the intense and long summer years of 1976 and 2003 and all room spaces pass against the London design summer year of 1989 except the sports halls. Even though the applicant has provided evidence that Policy 5.9 has been followed in order to minimise the cooling, further design measures should be investigated in order to reduce the unwanted solar gains entering the affected spaces.

69 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant should model additional energy efficiency measures and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone. The BRUKL sheet including efficiency measures alone should be provided.

#### District heating

70 The applicant has stated that there are no existing district heating networks within the vicinity of the proposed development. However, the Energy Masterplan for the London Borough of Harrow (January 2016) includes a long term vision of a district heating network within Harrow; the proposed network is approximately 800m from the school site. Given the upcoming opportunities for district heating networks in the area, the applicant should contact the Council's energy officer to determine the current situation of the proposed network; evidence of correspondence should be provided to demonstrate that this has been fully investigated. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network.

71 The applicant is proposing to install a site heat network. A drawing showing the route of the heat network linking all uses on the site has been provided. The site heat network will be supplied from a single energy centre. An energy centre location and layout drawings have been provided. This is welcomed.

#### Combined Heat and Power (CHP)

72 The applicant is proposing to install a 104 kWe (140 kWth) gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide 60% of the development's total heat load. A reduction in regulated CO<sub>2</sub> emissions of 94 tonnes per annum (27%) will be achieved through this second part of the energy hierarchy. Whilst this is welcomed, the BRUKL sheet of the 'be clean' scenario should be provided (without any renewable technologies). The applicant should also provide information such as the total site's heating load (MWh annually) as well as information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

#### Renewable energy technologies

73 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 600sq.m. of photovoltaic (PV) panels. A reduction in regulated CO<sub>2</sub> emissions of 41 tonnes per annum (12%) will be achieved through this third element of the energy hierarchy. A detailed roof layout should be provided indicating the PV installation provision. The BRUKL sheet of the 'be green' scenario should also be provided.

#### Overall carbon savings

74 A reduction of 131 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 38%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, which is welcomed. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

## **Flood management**

75 **Flood risk:** The flood risk assessment confirms that the site is within Flood Zone 1 and is not at significant risk of any other form of flood risk. Therefore, the proposals are acceptable in terms of London Plan Policy 5:12 'Flood Risk'.

76 **Sustainable drainage:** Whilst the surface water flood risk at the site is not particularly significant, the school is at the top end of a local catchment which does have significant flood risk further downstream (generally south and east of the school), therefore the management of surface water will be an important consideration for this development. The flood risk assessment states that the development will limit run-off from the site to 5l/s/ha. This will be achieved through a range of surface water storage facilities totalling 1,920m<sup>3</sup>. The exact details of the drainage system are yet to be worked out but have been agreed in principle with Harrow and Brent Councils Lead Local Flood Authorities. Therefore, the proposals are acceptable in terms of London Plan Policy 5:13 'Sustainable Drainage', and need to be secured by appropriate planning conditions.

## **Transport**

77 It is proposed that the current access road is diverted in order to reduce conflicts between pedestrians and vehicular traffic. A new vehicular access is to be provided via Garlands Lane, with a segregated pedestrian access south of this point. TfL is satisfied with this arrangement.

78 Visitor parking for 16 spaces (including 4 disabled spaces) is to be provided for the Mathematics buildings. A further 2 disabled parking spaces will be provided outside the current Harrow Rifle Corps offices. Furthermore, an additional 13 spaces will be created for the dining hall. TfL is satisfied that the increase in car parking quantum has been appropriately justified within the Transport Assessment.

79 TfL considers that the proposal will result in a minimal uplift in trips, thus it will have a negligible impact on the strategic transport network. TfL is also satisfied that impact to existing bus service will be insignificant. Therefore, TfL will not be seeking any mitigation measures. 6 cycle parking spaces are to be provided for the sports building with a further 4 spaces provided adjacent to the dining hall service area. TfL welcomes this provision of cycle parking and is satisfied that it meets London Plan cycle parking standards.

80 To minimise the impact of this development on the highway network during the construction and operational phase TfL requests that a delivery and servicing plan (DSP) and construction logistics plan (CLP) are submitted to the Council for approval. At the pre-application stage, TfL requested a travel plan, however given the nature of the school and additional justification within the Transport Assessment, TfL accepts that a school travel plan would not be necessary for this redevelopment.

81 As the proposal is to be used wholly or mainly for the provision of education as a school or college, Mayoral CIL charging is therefore not applicable.

## **Local planning authority's position**

82 Harrow Council planning officers have yet to confirm their position.

## **Representations**

83 To date over 1,300 petitions of objections to the scheme has been registered on change.org and on WriteOn sent directly to the Mayor of London and Harrow Assembly Member – Navin Shah, from residents and societies including the Harrow Hill Trust. Concerns include loss of MOL, overdevelopment and lack of sufficient public consultation. These will need to be considered by the Council in its

reporting of the scheme, and will be further assessed by GLA officers at Stage 2, whether the Council has addressed them, in the case of approval.

## **Legal considerations**

84 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

85 There are no financial considerations at this stage.

## **Conclusion**

86 London Plan policies on principle of land use - provision of education facilities on MOL, playing fields and community use, biodiversity, urban design, inclusive access, sustainable development/energy, flooding management and transport are the key strategic issues relevant to this planning application. Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not fully comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming fully compliant with the London Plan:

- **Principle of land use – provision of education facilities on MOL:** The proposed school redevelopment, in particular the Sports Building is 'inappropriate' development on MOL and the applicant is required to demonstrate very special circumstances to justify the development. As discussed above, the MOL swap arrangement is acceptable as it is well considered and will result in a net gain in footprint, with equivalent or greater MOL quality, more functional and open landscaped area. This MOL land swap identified in the Harrow School SPD, the academic needs, and the proposed enhanced community use, all combine to constitute very special circumstances justifying the 'inappropriate' development of the proposed Sports Building on MOL.
- **Playing fields and community use:** Whilst the School's commitment for an enhanced community use of the sports facilities is welcomed and supported, the applicant should continue its engagement with the local community, nearby schools and sport clubs in the production of the community use plan, which demonstrates the extent of proposed community use of the facilities, in a form that can be secured by the Council to ensure delivery.
- **Biodiversity:** The proposed implementation of biodiversity best practice guidelines including the mitigation measures will minimise the adverse impact of the proposed redevelopment. This is supported and need to be conditioned.
- **Urban design:** In regard to any impact of the redevelopment on the character of the MOL, officers are content that the proposals as they utilise the natural slope will appear as an integral feature of the wider school campus and would have limited impact on its open character as a result. However, the Council is encouraged to secure key details such as window reveals and samples of all facing materials and the treatment of roofs through appropriate conditions.

- **Inclusive access:** Given the natural slope of the site, it is noted that incorporating inclusive access is extremely challenging. However, the applicant has committed to provide wherever possible to meet the minimum requirements of inclusive design, which is supported and welcomed. The proposed measures need to be conditioned.
- **Sustainable development – energy:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, which is welcomed. However, the concerns highlighted above should be addressed before compliance with London Plan energy policy can be verified.
- **Flooding management:** The proposals are acceptable in terms of London Plan Policies 5.12 ‘Flood Risk’ and 5.13 ‘Sustainable Drainage’, and need to be secured by appropriate planning conditions.
- **Transport:** No strategic transport concerns. However, the submission of a delivery and servicing plan and construction logistics plan should be conditioned.

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## Appendices

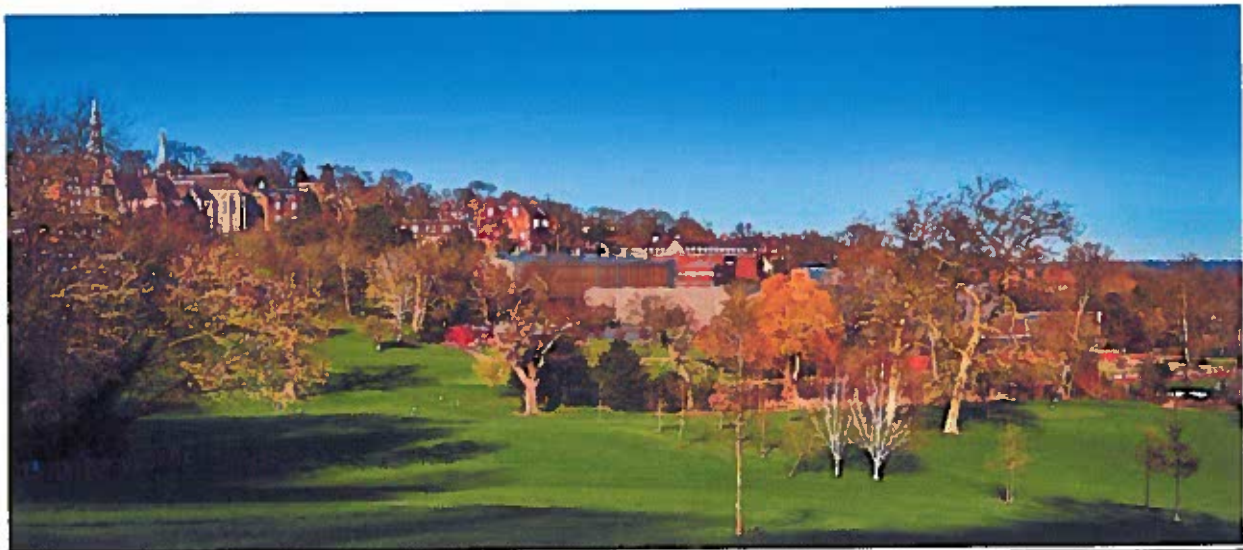
### **Appendix 1: The proposed MOL swap diagram:**

*Source – applicant's planning documentation, April 2016.*



### **Appendix 2: Selected views of visual impact analysis.**

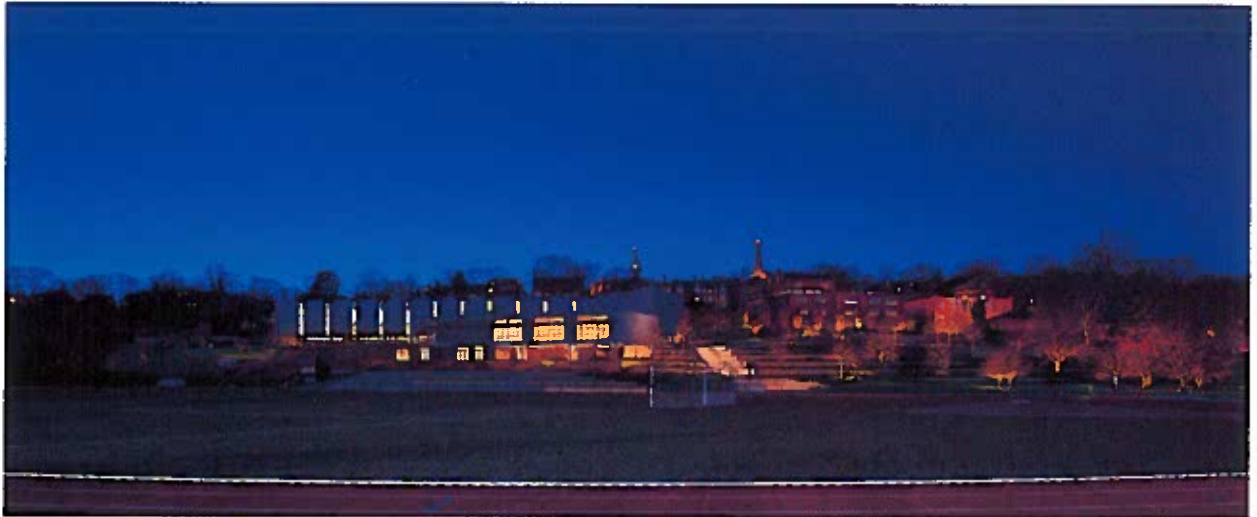
*Source – applicant's planning documentation, April 2016*



*Long view from southern edge of Harrow Park looking north*



*View from far side of the Athletics Track looking north east*



*View at night – from the far corner of the Athletics Track looking west*



*View from Capital Ring viewpoint adjacent to the Watford Road*

