

Harrow Civic Centre
Station Road
Harrow
Middlesex
HA1 2XY

Our ref:
Your ref:
Date: 12 December 2024

Dear Sir/Madam,

Re: New Local Plan Consultation (Regulation 19)

We act on behalf of John Lyon School and have been instructed to submit representations to the current New Local Plan Regulation 19 Consultation. Rapleys have also been instructed to submit representations on behalf of Harrow School, and the two representations are consistent and should be read in conjunction with one another.

The representations address the following matters:

- Proposed allocation O5, and
- A proposal to release parts of the School's playing fields from MOL in order to provide some housing on the fringes of the site, and improvements to the fabric of the existing playing fields, and community access to them.

Harrow School Estate Allocation

John Lyon School was founded in 1876, by the Governors of Harrow School for the education of local boys, in keeping with the wishes of John Lyon, Harrow School's founder. In 2021, John Lyon School became a mixed-school for new pupils from age 11, and as such became a co-educational school. John Lyon School and Harrow School together form 'the Corporation' (The Keepers and Governors of the Possessions, Revenues and Goods of the Free Grammar School of John Lyon, within the town of Harrow-on-the-Hill), hence the linked representations to the New Local Plan.

Like Harrow School, the John Lyon School buildings are a key part of the special character of Harrow on the Hill, and the School is a key local educator. As such, and in common with Harrow School, local planning policy should recognise that sensitive evolution, improvements and (if necessary) supporting development are key to the ongoing health and success of John Lyon School, and the benefits it brings to the Borough. Such development can also provide opportunities for greater community access to John Lyon School's facilities, which generates additional planning benefits (particularly in the context of the Local Authority's evidence base, which identifies a shortage of sporting and recreational facilities in the Borough). A prime example of this is the current application, that is currently under consideration by the Local Authority, to amend a s.106 agreement affecting the School, to allow for the use of its swimming pool for community swimming lessons.

Proposed allocation O5, covering both schools, is broadly welcomed by John Lyon School, not least as it is noted that the site objective is to:

Facilitate the continued maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.

It is also noted that the “allocated use” element of the allocation relates to:

Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields

However, in the context of previous representations and the foregoing commentary, it is requested that the “allocated use” element of the allocation be amended to:

Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields, and other development which will support the ongoing operation and/or evolution/improvement of Harrow School or John Lyon School

Evidently any development which is brought forward in the context of the allocation would need to be sensitively considered, in order to address matters such as heritage (the Harrow Area of Special Character, the Harrow on the Hill Conservation Areas, and Listed buildings) and MOL, but these are addressed by other policies in the New Local Plan and any allocation would not prejudice them.

Sudbury Hill Playing Fields

The John Lyon School Playing Fields at Sudbury Hill lie to the south of Harrow Hill, and fall outside the proposed O5 allocation. John Lyon School have aspirations to improve the Playing Fields, and increase community access to them. To support this, John Lyon School have instructed Rapleys to prepare the planning statement enclosed with this letter, requesting that the local authority consider part of the site for residential development, to support a package of measures including:

- Improvement of the sports pitches, and facilities on the site generally, and
- Residential development, focused on areas of the site that are, or are adjacent and well related to, land that is already previously developed.

Such development would:

- Assist the local authority in meeting the ambitious housing targets that have been set through the London Plan and the New Local Plan, and
- Improve the sporting facilities at the site, as well as the quality and accessibility of MOL with greater community access, that will support the Harrow Indoor and Outdoor Sports Facilities Strategy.

In this context, these representations:

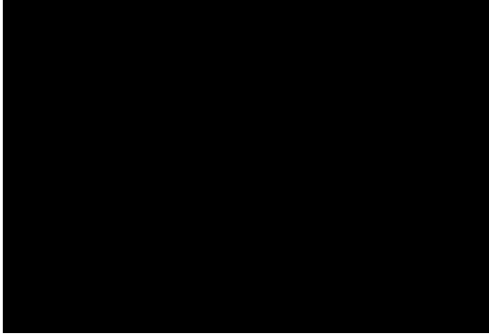
- Review the site and its surrounding context;
- Identify planning policy, at national and regional level, to plan-making in terms of housing delivery and MOL;
- Present an initial proposal as a basis for further discussion with the local authority, and
- Address the planning telling in favour of allocating parts of the site for residential development.

Although it is noted that, beyond a small piece of land in the Harrow School estate, the local authority is not proposing changes to MOL/Green Belt, it is requested that this site be considered further through the emerging policy process, given the planning benefits that would accrue from allocating parts of the site for residential development, and the resulting improvements to community access to sporting facilities in the area.

Conclusions

It is trusted that the representations are self explanatory, and that the Local Authority will give them full consideration as part of the consultation process. As confirmed above, John Lyon School (in parallel with Harrow School) would continue to welcome the opportunity to engage further on policy matters post-consultation, in relation to the site allocation, and the proposed MOL alterations.

Yours faithfully,



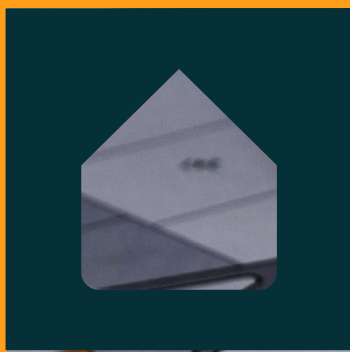
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1. Planning Statement re: Sudbury Hill Playing Fields

Harrow Call for Sites: Sudbury Hill Fields

Planning Statement for
The John Lyon School

24 April 2024
Our Ref: JAL/20-00983



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1 INTRODUCTION AND BACKGROUND

- 1.1 Rapleys LLP have been instructed by John Lyon School to make representations to the local authority's current Call for Sites consultation. They relate to the John Lyon School Playing Fields at Sudbury Hill (site location plan at **Appendix 1**), and request that the local authority consider part of the site for residential development, and confirm support for this in a policy allocation within future Local Plan documents.
- 1.2 The residential development would be promoted as a package of measures, including:
- Improvement of the sports pitches, and facilities on the site generally, and
 - Residential development, focused on areas of the site that are, or are adjacent and well related to, land that is already previously developed.
- 1.3 Such development would:
- Assist the local authority in meeting the ambitious housing targets that have been set through the London Plan and the emerging Plan, and
 - Improve the sporting facilities at the site, as well as the quality and accessibility of MOL.
- 1.4 In this context, these representations:
- Review the site and its surrounding context;
 - Identify planning policy, at national and regional level, to plan-making in terms of housing delivery and MOL;
 - Present an initial proposal as a basis for further discussion with the local authority, and
 - Addresses the planning considerations telling in favour of allocating parts of the site for residential development.

2 SITE AND SURROUNDINGS

- 2.1 The site is predominantly used as playing fields to support John Lyon School and, in the main, comprises open playing fields on a slope running west to east and south to north across the site, with the northern part of the site higher than the southern and western ends. The entire site lies within Metropolitan Open Land (MOL).
- 2.2 Notwithstanding the open nature of most of the site, there are three clusters of built development on the site, illustrated on the plan attached at **Appendix 2**:
- To the north (roughly corresponding to the land within the red line), consisting of a two storey pavilion with a gently sloping roof, the large corrugated “Bowmen of Harrow Archery Club” building, a chalet bungalow in ancillary residential use, a maintenance compound (including some corrugated sheds) and a recently constructed, formally laid-out tarmac car and coach parking area.
 - To the south (roughly corresponding to the land within the blue line), consisting of the Old Lyonian Pavilion and an informal parking area.
 - There is also an area of hardstanding to the west of the site, roughly corresponding to the land within the green line.
 - Further, to the east of the northern cluster, is an area of recently constructed all-weather multi-use pitches with flood lighting, extending to the eastern boundary of the site, shared with the four storey Buchanan Court Care-UK complex
- 2.3 In this context, notwithstanding the open nature of the main, central part of the site, its fringes are significantly more urban in character, and offer little to the openness of MOL in this area.
- 2.4 The site’s north-eastern boundary and main point of access is the A4005 Sudbury Hill. Between the pavilion and the western boundary (but outside the defined School ownership) is a wooded area within which is a tennis court. Beyond this are a number of two to three storey residential properties accessed off the Harrow Field Gardens cul-de-sac.
- 2.5 At the western boundary of the Sudbury Hill Playing Fields site is part of section 9 of the Capital Ring strategic walkway. and this part of the route is set within mature trees/woodland. The southern boundary is South Vale, from which vehicular access is also secured, with two storey housing opposite. The eastern boundary is a mix of commercial properties and residential on the A4127 Greenford Road, of varying heights, including three storey residential development adjoining the south-east of the site.
- 2.6 The site is well located to public transport, particularly the southern part of the site, which is PTAL rated 3, and within a two minute walk of Sudbury Hill Railway Station and the nearest bus stops, with Sudbury Hill Underground Station (Piccadilly Line) a four minute walk away. In addition, bus stops are situated adjacent to the northern part of the site, on Sudbury Hill.

SUMMARY

- 2.7 In this context, the playing fields, which make up the majority of the site, are clearly distinguishable from the surrounding built-up area, and provide for open air facilities. However, there are no features or landscapes of national or metropolitan value relating to the site, and – given that the site is surrounded by built development on all sides - it does not form part of a strategic corridor or similar in terms of green infrastructure.
- 2.8 Further, the fringes of the site include previously developed land, and are built up particularly in the northern and southern part, but also by dint of the former tennis courts. As such, these parts of the site do not add to the openness of the playing field site.

3 PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK

- 3.1 The National Planning Policy Framework (NPPF, December 2023) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced (Paragraph 1).
- 3.2 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. This means that the planning system has three objectives:
- An economic objective, including ensuring that sufficient land of the right types is available in the right places and at the right time;
 - A social objective, including ensuring that a sufficient number of and range of homes can be provided to meet the needs of present and future generations, and
 - An environmental objective, by protecting and enhancing the natural, built and historic environment, by measures including the effective use of land (Paragraph 8).
- 3.3 Both plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole (Paragraph 11).
- 3.4 Plans should, inter alia, be shaped by early, proportionate and effective engagement between plan-makers and communities, and local organisations (Paragraph 16).
- 3.5 The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area (Paragraph 17). Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing) (Paragraph 20).
- 3.6 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (Paragraph 61).
- 3.7 Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for years one to five of the plan period; and
 - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (Paragraph 69).
- 3.8 Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should, inter alia, identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved (Paragraph 70).
- 3.9 Green Belt (and by extension Metropolitan Open Land, given Policy G3 of the London Plan 2021), serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (Paragraph 143).

3.10 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans (Paragraph 145).

3.11 Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport (Paragraph 147).

THE LONDON PLAN 2021

3.12 The London Plan was adopted in March 2021, and is the overall strategic plan for London, and it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

3.13 To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must, inter alia

- prioritise sites which are well-connected by existing or planned public transport:
- protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible (Policy GG2).

3.14 To create a housing market that works better for all Londoners, those involved in planning and development must:

- A. ensure that more homes are delivered
- B. support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable
- C. create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing
- D. identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset
- E. establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value (Policy GG4).

3.15 Ten year housing targets are set for net housing completions for each local authority, which should be included in Development Plan Documents. The target for Harrow is 8,020 homes, or 802 per annum over the plan period. To ensure that ten-year housing targets are achieved, boroughs should prepare delivery-focused Development Plans which, inter alia, allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification. In addition, plan making should optimise the potential for housing delivery on all suitable and available brownfield sites, especially (inter alia) sites with existing or planned public transport access levels (PTALs) 3 to 6, or which are located within 800m distance of a station or town centre boundary (Policy H1).

3.16 Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

- 1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London

3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

3.17 Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL (Policy G3).

4 OUTLINE PROPOSALS

- 4.1 It is intended that the proposals for the site be discussed in further detail between the local authority and the school, as emerging policies progress. Further, feasibility work will be carried out in due course to better inform development potential. However, for the purposes of this “Call for Sites” exercise, a development parameter diagram is attached at **Appendix 3**.
- 4.2 The proposals can be summarised thus:
- The northern land parcel (Area A) - residential development up to three storeys (containing twelve 2-bedroom flats), and a replacement grounds manager house;
 - The southern land parcels (Areas B1 and B2) – six 2-3 storey semi-detached houses (B1) and six two-storey semi-detached houses (B2);
 - A new sports pavilion and other ancillary facilities on the northern part of the playing fields, broadly in the same location as the existing;
 - The upgrading of the existing playing fields, and an additional MUGA;
 - Environmental/biodiversity enhancement across the site, and
 - Greater community access to the playing fields.
- 4.3 Development on the northern and southern land parcels will utilise the existing accesses from Sudbury Hill and South View, respectively.
- 4.4 In terms of the quantum of residential development proposed, this will need to be definitively informed by future feasibility investigation, but it is considered that the two land parcels are capable of delivering approximately 24 residential units, both flats and houses.

5 PLANNING CONSIDERATIONS

- 5.1 In support of the outline proposals, the following commentary is provided on the key planning considerations arising: [Work in progress – this section will need to be reviewed in the event that the local authority releases evidence base documents before the Call for Sites deadline]

HOUSING NEED

- 5.2 The London Plan 2021 requires Harrow to deliver a minimum of 802 new dwellings per annum over the next ten years. As recognised by the authority itself (in representations to the London Plan), this is a significant challenge given the already substantially built-up, “Metroland” character of the Borough. Further, the large amount of development recently delivered within Harrow town centre, and on strategic sites, means that opportunities for further growth are likely to be limited as, put simply, there are few other locations which are capable of accommodating significant levels of new housing (not least as the “small site” requirement within policy involves a 50% increase of delivery over current levels).
- 5.3 In this context, the evidence base overstates housing delivery, and Harrow’s emerging plan will have to plan for some, limited, release of Metropolitan Open Land as there are insufficient locations elsewhere in the Borough to accommodate the quantum of housing that needs to be delivered – as such, it is anticipated that exceptional circumstances will apply. Further, subject to feasibility, it is considered that the site is capable of delivering approximately 24 dwellings.

METROPOLITAN OPEN LAND

- 5.4 In the context of the need to review MOL boundaries as a result of housing need, the areas shaded in orange (ie areas A, B1 and B2) on the plan attached at **Appendix 3** should be released from MOL, and allocated for residential development, not least as:
- 5.5 The areas that are identified for release are, largely, already previously developed land (or adjacent or well related to it), whereas the vast majority of the site (approximately 95%) would remain open;
- The approximately 5% of the site to be redeveloped is the part of the site which contributes little to the purposes of including land in MOL, not least as it does not provide open space that is clearly distinguishable from the wider built-up area, or any of the other purposes of MOL set out in the London Plan;
 - The area is in a highly sustainable location, in the context of Harrow as a whole (see transport matters below), and
 - The release of part of the site has the potential to benefit the remaining part of MOL on the site, through enhancements and other planning benefits (see planning benefits below).
- 5.6 Therefore, the release of the two land parcels from MOL should be supported by the local authority.

BUILT FORM

- 5.7 The scale of development proposed reflects prevailing building heights in the surrounding area, in particular:
- In terms of the northern land parcel, the development proposed is of a similar scale to residential blocks nearby, and
 - In terms of the southern land parcel, the development on the eastern part of the parcel will match the block of flats adjacent, whereas the housing on the rest of the site will reflect the semi-detached housing on the south of South View.
- 5.8 In this context, any new buildings would be entirely in keeping with their surroundings in terms of scale (with matters such as internal layout and design evidently being a consideration in due course).

HERITAGE

- 5.9 Although it is noted that part of the site lies in the Harrow Area of Special Character, and Sudbury Hill Conservation Area, it is very much on the fringe of both designations and as such the site is considered to contribute little to either. Therefore, heritage matters are not considered to be grounds for not releasing the land from MOL in principle. Notwithstanding this, clearly any development scheme, particularly on the northern parcel, will need to be carefully designed in order to ensure that any affected heritage assets are preserved or enhanced.

TRANSPORT

- 5.10 The site is, in the context of Harrow borough, in a very sustainable location. As confirmed previously in this statement, the southern land parcel lies within PTAL 3, very close to Sudbury Hill railway and

Underground stations. Both sites lie very close to existing bus stops. Therefore, any development will be sustainably located and minimise reliance on the private car.

- 5.11 In terms of vehicular access, existing arrangements will be utilised (with improvements introduced if/as necessary).

PLANNING BENEFITS

- 5.12 In addition, and subject to further research, the release of the two land parcels from MOL would enable additional planning benefits to MOL and the wider community, not least:

- Ecological and biodiversity improvements to the retained playing field areas, and
- Increased community access to the improved facilities.

- 5.13 These matters would further tell in favour of development on discrete parts of the site.

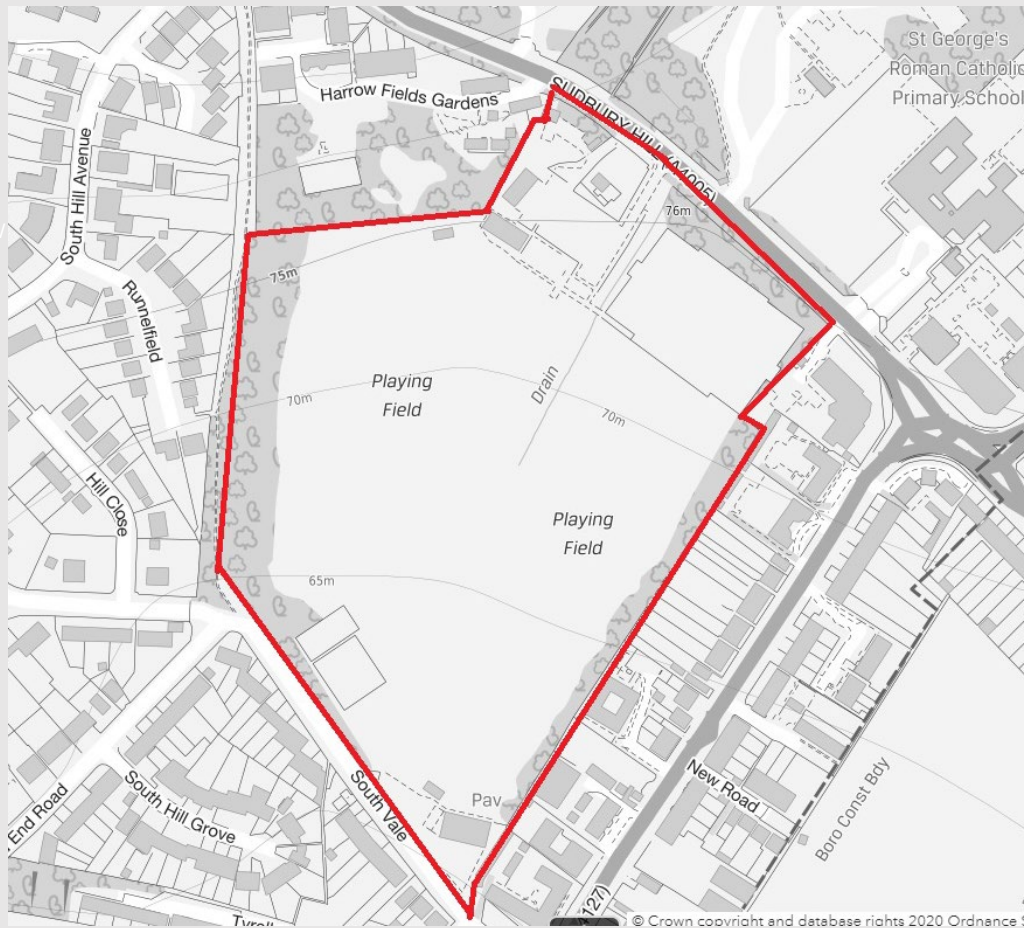
OTHER DEVELOPMENT MANAGEMENT CONSIDERATIONS

- 5.14 It is recognised that, in addition to the above matters, any proposal will need to address all relevant development management considerations. This will be the subject of further work, as proposals are advanced.

6 CONCLUSIONS

- 6.1 Rapleys are instructed, by John Lyon School, to submit representations relative to the Authority's Call for Sites exercise. These representations seek the release of two discrete land parcels from MOL, and their allocation for residential development.
- 6.2 The land parcels currently offer little to MOL, not least as they are currently largely previously developed land (or well related to previously developed land), and their release will assist the local authority in meeting the ambitious housing targets set by the London Plan. They are also in a highly sustainable location, close to public transport, and their release could deliver wider planning benefits to MOL and the local community.
- 6.3 It is therefore requested that the local authority identify the two land parcels outlined in red on the plan at **Appendix 3** as suitable, available and achievable for housing, with a total quantum of development across both parcels of 24 units (albeit to be kept under review in the context of future feasibility work). In any future development plan documents, the parcels should be removed from MOL, and allocated for housing.

Indicative Site Location Plan








Source: Harrow Planning Map Extract

Indicative built-up areas within the site



Source: Harrow Planning Map Extract

-  buildings
-  hardstanding/similar
-  other PDL
-  non-PDL
-  access

Outline Proposals





Sudbury Fields Development Options – Call for Sites

Area A

- PDL (although NW corner is in Conservation Area)
- Currently grounds machinery yard and single (2 storey) house for Grounds Manager
- To be replaced by up to 4 x 3 storey town house style units (each unit 3 x 2 bed flat) and 1 x 3 storey town house for Grounds Manager

Area B1

- PDL
- Currently the South Pavilion and car parking
- To be replaced by up to 6 x 2-3 storey semi-detached houses

Area B2

- PDL (former tennis courts/hardstanding)
- To be replaced by up to 6 x 2 storey semi-detached houses

MUGA

- Intent would be to add an additional all-weather pitch at either the Southern end of the pitches or next to the existing MUGA at the Northern end
- In either scenario, expectation would be to facilitate community usage, in line with Harrow Outdoor Sports Facility Strategy

Pavilion/Machinery Shed

- PDL
- Intent would be to use the combined footprint of the North Pavilion, South Pavilion, Archery Range and Machinery Sheds to build a new combined building on PDL to deliver all those functions