

HCAAC's objection in relation to HGY/2023/0316

This application, in respect of Far Playing Fields, Highgate School, is for:

“Engineering and groundwork operations to relevel existing playing surface and improve drainage including installation of a synthetic turf pitch, creation of biodiverse margins, new emergency and service.”

Highgate Conservation Area Advisory Committee (“HCAAC”) objects to the application for the reasons set out herein.

The applicant has, in its Design and Access Statement, recognised that the site is within Metropolitan Open Land “MOL” and as a result is subject to the NPPF, the London Plan and the Development Management Development Plan Document.

The applicant accepts that the proposal for an artificial grass pitch does not meet Exception 4 to the policy and guidance issued by Sport England. The applicant, instead, relies upon Exception 5.

The application of Exception 5, however, is not a given. Under the section of the Sport England policy and guidance entitled “Do proposals for artificial grass pitches and multi-use games area meet with Exception 5?”, it is stated at paragraph 76 that:

“Artificial grass pitches or multi-use games areas may be able to sustain more intensive use than natural grass playing pitches. However, they will not be preferred in relation to Exception 5 purely for this reason. This is because a proposed artificial grass pitch or multi-use games area may be unsuitable to accommodate some grass pitch sports or the standards of play or grades of competition required for some sports. Also, they may not be sufficiently flexible to readily accommodate changes in demand for playing pitch types and sizes compared to the current area of playing field.”

The applicant has singularly failed to assess the proposal against the criteria set out in paragraph 76 above. No determination can be made by the Council until such time as this assessment has been undertaken and a period for due consultation has been provided.

Further, it is telling that, in setting out the current use of Far Field, the applicant talks of “undrained natural grass surface”, but fails to undertake a comparison with a drained grass surface. This comparison must be undertaken.

In addition, it is quite clear from the Design and Access Statement that the applicant did not know where the existing drainage was, had not kept it in good condition and that a CCTV survey and excavation to locate the existing arrangements was required. The result was that drains were broken, silted-up, damaged/encroached on by tree roots. It is of no surprise, therefore, that it was regularly waterlogged. The failure to maintain the existing cannot properly be used to justify the proposed change to an artificial pitch.

The applicant has simply not addressed the NPPF and London Plan policies in relation to MOL and there is nothing in the Heritage Statement in relation thereto either. These failings alone are sufficient for the Council to refuse the application.

The applicant has produced a preliminary ecological assessment which, strangely, concludes that the proposed development will have an acceptable sustainability impact. We say “strangely” because of the three scenarios, Scenarios 2 and 3 have increased lifecycle emissions of 5,041,337 kgCo2eq and 4,453,144 kgCo2eq respectively when compared to 1,821,558 kgCo2eq for Scenario 1. Despite the

disparity in those emissions, the applicant concludes that Scenario 3 would be more favourable even though it can only say that the reduction in emissions is an “opportunity” which would need to be verified.

Bearing in mind its much lower emissions compared to the other scenarios, if the applicant wishes to continue with its proposal, it is imperative that it explores Scenario 1 more fully, namely:

“Existing playing field: natural turf pitch: 13,950m². - Grass pitch with constructed drainage below and 5-year drainage maintenance intervals.”

We note that documents in respect of Tatum Field and The Orchard have been submitted with this application. Those documents should not be considered, as they are irrelevant to this application and they should be removed from the planning portal for this application.

Finally, it was said that the various applications to be made by the applicant were to be submitted at the same time and not piecemeal as is happening now.

For all the above reasons, this application must be refused by the Council. If, contrary to what we have said, the Council is minded to grant permission the application should go before the planning scrutiny panel.