

KINGSLEY PLACE RESIDENTS ASSOCIATION

c/o 23b Kingsley Place
London N6 5EA

21 April 2023

Objection to Planning Application HGY2023/0328 (DYNE HOUSE) and HGY/2023/0679 (ISLAND SITE, SOUTHWOOD LANE)

We write on behalf of residents in Kingsley Place.

We object to the applications for the following reasons.

1. Scale of redevelopment

The extent of the proposals is enormous: see Estate Wide Area Schedule application document for existing GEA/GIA versus Proposed GEA/GIA. For Dyne House and Island site, the existing areas will more than double: enlargements by 106% for GIA and 116% for GEA.

2. Justification for enlargement

It appears that the Needs Assessment in the SPD is simply a reproduction from a report produced by consultants appointed, paid for and working for the school. It is not clear that the council has independently tested and scrutinized the school's own claims of its "needs". It is questionable whether the council is properly exercising its functions by not scrutinizing the school's claims.

In fact, the school has been operating very successfully (e.g. awards and league table positions for academic results) with its existing facilities. The "needs" are in reality over-ambitious aspirations. Private schools are engaged in a "facilities arms race" to match or out-do each other in facilities. The scale of the school's proposals is really a tacit admission that, if it wants facilities of the scale proposed, it has outgrown its estate. Shoe-horning such extensive enlargement into the existing sites is not an acceptable answer. The school has to be mindful of, and obedient to, the context in which each site sits and the consequential constraints. In short, these are hugely over-ambitious proposals, divorced from, and materially detrimental to, the setting of the sites in a conservation area and surrounded by Grade II listed residential properties.

3. Future further development

Whatever the outcome of the current applications, the school should be required to give a legally binding deed of covenant in perpetuity in favour of, and enforceable by, immediate neighbours (both current and in future, for the time being and from time to time) not to conduct any other new

building work on these sites in future. The current SPD lasts until 2031. Neighbours should not be at risk of future further incremental development.

4. Pupil numbers

The school has said that it has no “intention” of increasing pupil numbers above the current permitted level. That is a deeply suspect claim.

First, a statement of mere “intention” gives no legally enforceable comfort. Intentions may change at any time. Among other things, a change of Head or changes in the composition of the Board of Governors (both of which are highly likely during the life of the SPD) or political changes to the status of private schools are all possible reasons for increasing pupil numbers in due course.

Secondly, the sheer scale of the increases (see 4 above) suggests that, in due course, the school will have capacity to increase pupil numbers once these facilities are completed.

Thirdly, the school will have a considerably financial incentive to increase pupil numbers and revenue, give the £145 million overall cost of the proposals across the school’s estate (part of which is borrowed money, with an interest payment burden and eventual principal repayment).

Fourthly, any increase in pupil numbers would give rise to a host of other issues for the Highgate community, including traffic increase, public transport burden and environmental pollution. Currently, approx. 4,000 school pupils (for Highgate School and the other schools in the area) pass through Highgate village each day during term time.

In short the council should not let itself be unwittingly used by the school to achieve any undeclared ulterior motive of increasing pupil numbers by such huge expansion of its buildings.

5. Island Site

The proposals include a wholly new terrace at first floor level, looking out over Southwood Lane and directly into houses on the east side of Southwood Lane. The terrace is unnecessary for the school’s function.

6. Dyne House replacement buildings

The replacement of the existing buildings would create new sight lines into the gardens of 23A and 23B as well as numbers 23-27 Kingsley Place.

That would be a totally unacceptable invasion of current enjoyment of residents’ home, gardens and their privacy.

Any such replacement buildings should be of a height no greater than the eaves of the existing roofs of the red brick buildings and no higher. Side windows on such buildings would also inflict a wholly new set of sight lines into my garden, again a highly detrimental invasion of current

amenity. These should either not be permitted at all or should be opaque at the very least.

7. Gibbons Garden

The SPD states “It is intended that this area [Gibbins Garden] remains open”. The proposals show new building in the area – a flagrant breach.

8. New flat roofs and “greening”

It should be required that new flat roofs (eg to the red brick buildings replacements below Gibbons Garden) be accessible only for strict maintenance requirements. Otherwise, their use by pupils/staff would create a new and highly invasive intrusion of neighbours’ existing homes and gardens.

As regards proposed “green” roofs, that is lip-service by the school to environmental issues. Experience shows that the school’s existing green roofs (eg on buildings in Hampstead Lane) and ill-maintained and unsightly.

Further, the school’s environment record is appalling. Lights are habitually left blazing in the existing Science Block and Museum in Southwood Lane for many hours after the end of the school day, causing significant light pollution.

We call for far stronger management of lighting by the School – which would be in their interests in terms of costs as well as good for the environment and neighbours.

9. Basements

The size and number of new basement works is shocking and staggering. The SPD describes the Dyne House site as “topographically challenging” and the Basement Impact Assessment forming part of the application as “steeply sloping”.

Given the size of the redevelopment, its additional ground weight and the depth of basement works, there must be a very serious risk of settlement and subsidence over time resulting from the works. Given the surrounding housing stock is C18-19th century (and in a conservation area and Grade II listed), neighbouring properties face a real risk of serious damage over time. That is totally unacceptable. No new basement work should be permitted.

The justifications seem tenuous at best – and include the statement “4.5.7 Numerous basements of similar depth and scale have been successfully constructed throughout London within similar geological conditions and urban settings”. That is irrelevant – what is relevant is the potential impact of these proposals in this unique context, which is known to have several underground rivers, as well as be sloping.

If any new basement work is to be permitted, then it should be on condition that the school takes out adequate insurance, at the school's cost, for the benefit of neighbours for a lengthy period (eg at least 10 years) and demonstrates each year that such insurance remains in place.

10. Trees

We are disappointed to note large trees on the school site are to be cut down. Not only do these provide screening of the site for neighbours, some are also visible from the Highgate Bowl and their removal would be detrimental to the vista.

11. Site traffic management

The amount of site traffic consequential on proposals of this scale will be enormous and prolonged. The routing of site traffic down Southwood Lane would cause very great congestion and disturbance, particularly as Southwood Lane narrows past Kingsley Place and by the junction with Jacksons Lane/Southwood Lawn Road. While site traffic is passing, the traffic flow would in effect be one way only, resulting in backing up and congestion of oncoming traffic. The simple fact is that the road network is unsuitable and inadequate for the amount of site traffic that these proposals would cause.

12. Parade ground and traffic through Kingsley Place

We note that the parade ground is to be used as a sort of builders' depot. This will no doubt result in additional traffic through Kingsley Place. Kingsley Place is a cul-de-sac with several tight turnings that any additional traffic will have to navigate to reach the gate access into the parade ground. We note that this access will be used "occasionally". We feel this is an entirely inadequate restriction, as it is undefined and unmeasurable. We call for a strict limit on use of Kingsley Place for the duration of the building works that sees a minor – less than 10% – additional volume in traffic movements through Kingsley Place.

13. Overall disruption and nuisance

The overall impact of site work across the Science Block (18-24 months according to the school) and then the Island Site and Dyne House (36 months according to the school – but given the scale of development and the topographically challenging site, delays must be almost inevitable) will be intolerable from neighbours due to noise, dirt, vibration and disruption.

The reality, of course, is that many properties in the surrounding area will be adversely affected by the site works and traffic for a multi-year period, to the extent of being victims of inhumane and intolerable noise and disruption over a very extended period.

In any event, any approval should have strict conditions as to working hours (Mon-Fri, 8am-6pm) with no weekend working (to give residents some respite) – and "working" should include preparatory work/deliveries/take-aways.

The current proposals are massively inappropriate over-development in their settings and the community context, solely to benefit Highgate School's grandiose and selfish aspirations and to the serious detriment of many residents.

14. Site visit

Before making any decisions, it is imperative that the members of the planning committee conduct a site visit to neighbouring properties in Southwood Lane and Kingsley Place: without that it is impossible to appreciate possibly the impact of the proposals. They should also walk the entire length of Southwood Lane, Kingsley Place and Castle Yard to understand the impact of site traffic on traffic flows.

Thank you for your consideration of these views.

On behalf of Kingsley Place Residents Association

A handwritten signature in black ink, appearing to read 'Adam' followed by a stylized surname.

Adam Garfunkel
Secretary
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