

Highgate Conservation Area Advisory Committee

1 MAY 2023 HGY/2023/0313: Junior Field Playing Pitches

Highgate Conservation Area Advisory Committee objects to HGY/2023/0313: Junior Field Playing Pitches

1. Introduction

These are the objections of Highgate Conservation Area Advisory Committee (“HCAAC”) to the above application for proposed works at Junior Field Playing Pitches, Highgate School, Bishopswood Road, London, N6 4PH, namely:

"Installation of a single storey modular classroom facility, on a temporary basis, for a period of up to ten years; associated means of enclosure, footpaths and landscaping' complete reinstatement of the synthetic surface upon cessation of use."

2. Background and policies (applicable to each of Highgate School's applications)

This is one of the series of planning applications for major building works by Highgate School. These are set out in the SPD agreed between Haringey Council, the school and the local community. The application numbers are:

HGY/2023/0313:	Junior Field
HGY/2023/0315:	Richards Centre
HGY/2023/0316:	Far Field
HGY/2023/0317:	Science Block
HGY/2023/0328:	Dyne House
HGY/2023/0331:	Formal Screening Opinion re. EIA
HGY/2023/0338:	Mallinson Sports Centre
HGY/2023/0390:	Science Block listed building application
HGY/2023/0697:	Dyne House listed building application

3. HCAAC's generic overarching objections to each of applications

These are Highgate Conservation Area Advisory Committee generic overarching objections to each of the applicant's applications listed in the background and policies section above. Each of those applications should be refused for the reasons set out in this section alone.

All applications in this series are expected to follow the planning principles and guidance in the Highgate School SPD. One of the most important of these is that each application must be considered not only on its own merits, but in relation to its effect on the Conservation Area as a whole.

The Highgate Conservation Area is unusual in that it covers more or less the whole of Highgate not just one particular area. It also extends into Camden and developments in the Haringey "section" impact directly on the Camden "section" of the Conservation Area.

Part of the Conservation Area's importance derives from this fact as it allows the development of Highgate, from a late medieval hilltop village to a modern semi-rural enclave within a major conurbation, to be clearly seen and understood by today's residents

and visitors. One factor in this unique survival is the delicate balance between Highgate Village and the school. If the school buildings become too dominant and threaten the frequently lauded leafy semi-rural character of the village this will be destroyed and the Conservation Area will suffer great damage.

It is also the case that when development has taken place in Highgate it has frequently been of notable architectural excellence, another factor in the importance of the Conservation Area. There are not many Conservation Areas which can boast of including work of architects of the standing of both Robert Adam and Lubetkin along with work by Walter Segal and that of the Hornsey Borough Engineer on the notable Gaskell Estate of 1913.

Equally, given the wide extent of all the works proposed it is essential that particular care is taken over tree work and other landscape features. What may be acceptable in a small one-off application can have disastrous consequences for the atmosphere, bio-diversity and ecological status of a wider area.

Other planning documents whose guidance must be followed contain similar policies with the same aim and are as follows:

- NPPF paragraph 95
- NPPF paragraphs 148 & 149
- Haringey site allocation SA 41; note also *“the school facilities can be enhanced BUT only when simultaneously benefiting the local communities.”*
- Haringey Local Plan; policies SP13 OPEN SPACES
- Highgate Neighbourhood plan policy DH2
- The London Plan (2021)

All these policy documents emphasise that ONLY development proposals which preserve or enhance the character of appearance of Highgate’s Conservation Area, and respect the settings of listed buildings, other heritage assets and Metropolitan Open Land should be permitted.

4. 'Need' for accommodation not provided

Sub-section 1 of Section B of Policy S3 (Education and childcare facilities) in the London Plan (2021) states that: “Development proposals for education and childcare facilities should:

1) locate facilities in areas of identified need”.

Changes in Gross External and Internal Areas of Buildings

Name of Site	Site Area (sqm)	Existing Total Gross External Area (sqm)	Proposed Total Gross External Area (sqm)	Existing Total Gross Internal Area (sqm)	Proposed Total Gross Internal Area (sqm)	Increase in Total Gross External Area (%)	Increase in Total Gross Internal Area (%)
Dyne House & Island	5,835	3,422	7,390	3,019	6,216	116	105
Science	1,500	2,995	3,424	2,720	3,124	14	15
Richards Music Centre	2,011	700	2,025	624	1,704	109	105
Mallinson Sports Centre	13,745	3,353	6,495	3,014	5,873	94	95
The Decant	4,140	0	2,473	0	2,460		
Total areas and changes as percent	27,231	10,471	21,807	9,385	19,457	108	107

Sources of figures

Area measurements: Applicant's table in HGY/2023/0328, file: 01/2/2023 230124 Site Wide Area Schedule

Totals and % increases: Calculated by HC/VAC.

The Highgate School SPD stated the school's intention to provide two new classrooms within the pre-preparatory school of the same size as the existing classroom (39sqm). Having said that, in its pre-preparatory school application (HGY/2020/2980), the applicant changed its intent to three classrooms of a larger size (46sqm).

The Case Officer for HGY/2020/2980 noted, correctly, that this increased size far exceeded the DfE (Department for Education) minimum requirements for these type of classrooms.

Despite recognising the over-provision, he then went on to rely upon the London Plan (2016) Policy 3.18 (Education Facilities) which stated that "Development proposals which enhance education and skills provision will be supported, including new builds, expansion of existing or change of use to educational purposes."

The Case Officer should never have invoked that policy as it was not designed to permit three proposed classrooms (providing each pupil with 6.9sqm) when the DfE standard for this age group is a minimum of 2sqm per child.

Importantly, that policy has been discarded in the London Plan (2021). So, there can be no basis whatsoever in trying to invoke it in justification for the increased provision proposed in these latest applications.

The Council needs to assess each of the applicant's applications against Policy S3 (Education and childcare facilities) in the London Plan (2021). In doing so, the Council will be bound to conclude that the applicant's proposals are not in furtherance of Policy S3.

Also, sub-section 1 of Section B of Policy S3 (Education and childcare facilities) in the London Plan (2021) states that: "Development proposals for education and childcare facilities should: 1) locate facilities in areas of identified need". The applicant has simply failed to identify that the proposed Mallinson Sports Centre is in an area of need.

In addition, the Council is bound to refuse the applications on the basis that the proposed enhancement of space standards and ancillary provision would have a significant adverse impact on heritage assets, that is, listed buildings and the Highgate Conservation Area.

Highgate School needs to aim higher in reducing carbon emissions not just in the areas covered by the current applications, but across its whole estate. Fabric improvements will be required within the next 10 years. We suggest that serious consideration should be given now to forward-planning which could include a district heating system to serve the Dyne House, Island, Bishopswood Road and St. Michael's primary school sites.

The amount of biodiversity found estate-wide is very disappointing. We would expect from such a low base that a significant and meaningful increase could and should be achieved.

Each of the applications, should be refused for the reasons set out in this section alone. Site-specific objections, which also require refusal by the Council, have been submitted in respect of each application and should be read in conjunction with the objections in this section. The site-specific objections to this application are set out in the sections below.

HCAAC believes that that proposals for the Junior Field are NOT in accordance with these policies and must, therefore must be refused.

The applicant has simply failed to identify that the proposed works at Junior Field Playing Pitches are in an area of need. The application should be refused on that ground alone.

5. Metropolitan Open Land

The proposed works at Junior Field Playing Pitches are in Metropolitan Open Land, therefore consideration needs to be given to the policy constraints in respect thereof. The London Plan 2021, at Policy G3 A, makes it clear that MOL is to be afforded the same status and level of protection as Green Belt, namely, that:

- "(1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt; and
- (2) boroughs should work with partners to enhance the quality and range of uses of MOL."

Policy G3 goes on to provide as follows:

*"8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. **MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity***

*8.3.2 Metropolitan Open Land is afforded the same status and protection as Green Belt land. Any proposed **changes to existing MOL boundaries** must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances consistent with the requirements of national policy."*

The emphasis in bold in the plan, not added by HCAAC, underlines the significant protections for MOL. The proposed works are "inappropriate development" in accordance with national planning policy tests that apply to the Green Belt (see, Policy G3 A above). Indeed, the applicant accepts that the proposed development would be inappropriate development and that very special circumstances would need to be advanced. It is obvious that the substantial harm caused to the MOL by the scale of the proposed works and the length of time (10 years) it is proposed to use the "temporary" facility could never be outweighed by any considerations let alone those advanced by the applicant. Even if, as asserted by the applicant, there is a strong policy justification for proposals which enhance education in the private sector, which is not accepted, as pupil numbers at the school are not to be increased, it follows that the proposals cannot and do not enhance that provision. Also, what is proposed is reliant upon the granting of permission on the other applications submitted by the applicant, all of which are contentious and subject to objections. So, even if the supposed "very special circumstances" advanced for the proposed works are justified, which we do not accept is the case, the applicant's reliance thereon cannot properly be evaluated and determined until decisions have been made on the other applications.

In addition, it follows that the proposed works reduce the MOL and as a result do not protect and enhance the open environment, quite the opposite, it detracts and diminishes the very quality of life benefits which the MOL is there to provide. Further, the applicant has simply failed to provide evidence to demonstrate the exceptional circumstances to justify what are in effect changes to the MOL boundary. The removal of part of the MOL for the benefit only of the applicant for what is far from a temporary period is not and never could be an exceptional circumstance.

It is noted that, rather than seeking to achieve zero-carbon on its each of its proposals, the applicant has chosen to pay a penalty. It is inevitable, therefore, that in the future there will need to be a zero carbon refurbishment across the whole estate, including the buildings covered by the applications. As all those works would not fit into a summer vacation work programme, there would need to be a rolling programme over five years or more. Thus, if this application were granted, the "temporary" use of the decant buildings for 15 years or

more is inevitable. Achieving zero-carbon across the estate now would not only be cheaper in the long run, but also deliver obvious benefits for global warming and the planet sooner.

6. Synthetic pitch

Finally, if contrary to what we have said and without prejudice thereto, the Council is minded to granted permission for the proposed works in MOL, reinstatement of a synthetic surface should not be permitted for the reasons stated in HCAAC's object to the application in respect of Far Field (HGY/2023/0316).

7. Conclusion

For all the above reasons, this application must be refused