

Highgate Conservation Area Advisory Committee

1 May 2023

Highgate Conservation Area Advisory Committee objects to HGY/2023/0315:
Richards Music Centre

1. Introduction

These are the objections of the Highgate Conservation Area Advisory Committee ("HCAAC") to the above application for proposed works to the Richards Centre, Highgate School, Bishopswood Road, Hornsey, London, N6 4NY, namely:

"Redevelopment of Richards Music Centre, including complete demolition of existing structure and development of a replacement building of two and a half storeys plus basement, and associated landscaping with improved provision for emergency services, servicing and disabled parking."

2. Background

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

HGY/2023/0316: Far Field

HGY/2023/0313: Junior Field Playing Pitches

HGY/2023/0315: Richards Building

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/2023/0679: Dyne House listed building application

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

These are Highgate Conservation Area Advisory Committee's generic overarching objections to each of the applicant's applications listed in the background and policies section can now be found below. 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 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 include 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 paragraph 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, respect the settings of listed buildings and other heritage assets and Metropolitan Open Land should be permitted.

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

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	106
Science	1,500	2,996	3,424	2,728	3,124	14	15
Richards Music Centre	2,011	700	2,025	624	1,784	189	186
Mallinson Sports Centre	13,745	3,353	6,495	3,014	5,873	94	95
The Decant	4,140	0	2,473	0	2,400	-	-
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 HCAAC.

As can be seen from this table the increase in total gross external area (GEA) amounts to (21,807 - 10,471) sq.m. = 11,336 sq.m of which (2,025 - 700sqm) = 1325 sq.m. relates to the Richards building, an increase of 189% in GEA. An increase on this scale in highly sensitive locations cannot be other than highly damaging to the Conservation Area. 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 Richards 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 1 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 sections. The site-specific objections to this application are set out in the sections below.

5. Detailed objections

Highgate Conservation Area Advisory Committee objects to this application for the following reasons set out in further detail below:

1. The proposed building and the percentage increase of proposed volume urbanises openness
2. Highgate School needs to justify the need for two auditoria
3. Existing non-MOL Use does not have planning permission
4. Buildings and footpath encroach on MOL
5. Only a very small part of the building relates to Sports (i.e. MOL-related)
6. 'Very special circumstances' have not been met
7. Design seeks to appear to be a Pavilion
8. Design lacks coherence and practicality
9. External fire escape would adversely impact neighbours and is clearly an afterthought
10. Impacts on neighbours
11. Proposal does not meet policy requirements
12. Carbon reduction targets are disappointing

Detailed Objections

5.1. The proposed building and the percentage increase of proposed volume urbanises openness

The percentage increase of 189% GEA and in the proposed volume urbanises an area with its recognised character of openness. Because of this enormous increase in size it encroaches on Metropolitan Open Land. Both these impacts are completely unacceptable.

5.2. Highgate School needs to justify the need for two auditoria

Highgate School is very aware of the need to balance the extra built area of the School across its campuses as is HCAAC. We consider the School needs to justify to Highgate residents the need, for example, of having two auditoria. The documents submitted do not set out how the need for the various spaces and their sizes has been calculated. It is essential that local people are given that information.

5.3. Existing non-MOL Use does not have planning permission

We note the existing Use as a Music Centre does not have planning permission. In their Planning Statement Bidwell's states:

"3.5 It is considered that there is no planning history on this site."

This statement suggests that no change of use from a Pavilion associated with Metropolitan Open Land was sought when it became the Richards Music Centre nor is there any record of an application on Haringey's planning website in which case it must be addressed in this application. The much increased area and bulk would be a factor which when weighed in the balance would, if for no other reason, mean this application must be refused.

5.4. Buildings and the footpath which encroach on MOL

Further, it is unclear whether the existing footpath running across the north elevation of the buildings is already 6m wide. Given that the brief required that this footpath must be 6m. wide and the footpath encroaches on MOL, this wide footpath and railings set above a retaining wall together with a ramp down to the pitch level with railings both sides either actually increases or exacerbates the sense of encroachment into MOL which is being sought.

The impact of the footpath on MOL is mentioned in DAS 7.1:

" Minimise the intrusion into the MOL with a minimum 6 metre access path between the north elevation wall of the building and the synthetic pitch".

Is the suggestion here that having a wide footpath makes the encroachment of the building into MOL less obvious or more acceptable? HCAAC are adamant that the footpath, ramp, railings, lighting, etc. all diminish both the area and quality of the MOL unacceptably.

The visual 'squeeze' on MOL at each end of the Junior Playing Field as a result of the enlargement of both Mallinson and the Richards building, the 6m wide footpath, ramp and associated railings together with removal of part of the pitch to excavate for a Fives Court and a projecting balcony would in our view be completely unacceptable. Drawings have been requested to show these combined relationships but have not been provided.

Very special circumstances have not been met.

5.5. Only a very small part of the building relates to Sports (i.e. MOL-related)

The proposals for this site have been developed without coherence. The decision to combine Drama and SpEx and other uses has no logical basis. SpEx has obvious links with the sports pitch but this is not so with Drama. The building as designed suggests that Drama is on the east side and SpEx on the west side but that is an illusion. Drama cannot be completely accommodated on one side of the building. It expands into a large basement and spills over into the west side at first floor level. In contrast SpEx requires only a very small amount of space for staff but none for pupils other than changing rooms. A small area is found for The Armoury and a large space is provided for a Staff Break Out Room therefore one side the building provides space which presumably cannot be found elsewhere on the School's Estate. It is a catch-all building in a sensitive location to the detriment in terms of bulk and design on the Conservation Area and has an unacceptable negative impact on the character of the Conservation Area, openness and MOL.

The amount of space in the building which relates to the playing field and Metropolitan Land is a small fraction of the total amount of accommodation which Highgate School proposes should be included in this building.

SpEx would be only a very small part of that part of the building which relates to MOL and the Sports pitches. The stated brief in 7.1 of the DAS required 242sm out of a total 999sm (excluding plant) that is less than 25%, to be dedicated to Sports, approximately 50 % of which is located in the basement. Drama accounts for 67.7% and the Staff Breakout and Kitchenette accounts for just 9%.

6. 'Very special circumstances' have not been met

HCAAC considers 'very special circumstances' have not been met and this application must therefore be refused. The relevant NPPF clauses are:

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

We have cited above:

1. The proposed building , although currently used for teaching music, does not have planning permission for this use. The existing Use is therefore a Cricket Pavilion in connection with the adjacent outdoor Junior Field used for summer and winter sports.
2. The proposed replacement building, the greater part of which is for Drama education and a room for staff across the Senior School to have a cup of coffee between lessons. There is a very small area for Sports staff and also changing rooms for pupils. The principle uses therefore have no connection with Sports. Thus the requirements of NPPF clauses 149 b) and d) are not met.
3. The proposed building is 189% larger than the existing Pavilion (see chart above). The GEA of the existing building is 700 sq.m (including the unusable attic); the GEA of the proposed building is 2,025 sq.m, in other words a near tripling of the size of the existing building, mostly by the addition of accommodation for non- SpEx Use, therefore the requirements of NPPF clause 149 d) are not met.
4. The need for the accommodation proposed in the new building to duplicate Auditoria space has not been justified.
5. The very wide path, ramps, railings and retaining walls all visually encroach unacceptably on the Metropolitan Open Land.
6. The proposed building brings together disparate accommodation for which apparently space cannot be found elsewhere but without providing evidence of the need thus the requirements of NPPF clause 149 d) are not met.
7. The Highgate School SPD mentions an MOL 'land swap' but ultimately it is not that document which dictates a decision on this matter.

7. Design seeks to appear to be a Pavilion

There seems to be an assumption on the part of the School and the architects that the new building should have the appearance of a Pavilion as it would be replacing a very attractive Pavilion and it sits in the context of playing fields. The sheer size of it might just be appropriate for a Test ground but even that is questionable. The illustrations indicate large numbers of adults looking out from the Staff Break Out Room and Kitchenette and the Drama classroom on the top floor as if those spaces would be open to parents and relatives on match days.

Are the large amounts of projecting north-facing glazing and balconies, peopled in the illustrations with spectators, visually misleading? In fact the amount of north facing glass to the north facing drama classroom and the Staff Break Out Room and Kitchenette would surely be highly impractical. Is it intended that these spaces would be dual purpose? If that is not the intention the illustration is highly misleading

8. Design lacks coherence and practicality

1. It seems that the high roofs are unnecessary or even a disadvantage in terms of the functions of the spaces enclosed. This suggests the architects wished to make a rather grander statement than is actually necessary to the detriment of the sensitive setting of openness
2. The slim line of roofs at junctions with vertical glass would result in a cold bridge which would mean re-design. It is not appropriate to seek planning permission for a building which is bound to have to be redesigned

3. The 'gutter' between the two sections of roof is, on close inspection, shown to meet the vertical glazing at high level in the Foyer in different ways though none looks realistic
4. What appears to be about an 80% glass façade on the north-facing elevation seems an affectation which is highly impractical
5. The extent of the much larger roof to the Drama part of the building makes it visually evident that Drama accounts for a very high percentage of the total area, albeit that Drama is not wholly contained in that section of the building
6. The design has failed to incorporate a secondary means of escape from the drama classrooms on the first floor necessitating an external escape stair. This is a design failure which should be solved
7. Given the building is set on low lying land the large expanses of zinc roofs would be seen from elevated positions to the east particularly. There is a risk of affecting the significance and setting of Highpoint. The proposed zinc finish may be too industrial and inappropriate in the closer domestic environment
8. The amount of light pollution would be unacceptable in this 'open leafy' area
9. Highgate Neighbourhood Forum is working with the School and other local organisations with large landholdings to increase biodiversity. The combination of light pollution, synthetic grass and a reduction in Metropolitan Land may result in desertification rather than an enhanced biosphere
10. The heraldic Coat of Arms on the diminutive west façade (facing Bishopswood Road) seems out of place. Is it intended to mark a Gatehouse 'entrance' to the Highgate School Estate as if it were a private domain?

9. External fire escape would adversely impact

The external fire escape would adversely impact neighbours and is clearly an afterthought. It should be eliminated by good design.

10. Impacts on neighbours

The impact on neighbours could be unacceptable:

1. It appears that public access and student recreational areas are planned for three sides of the building
2. The impact of the footpath on neighbours should be considered and if found necessary mitigated
3. Impact of noise on neighbours in relation to break out from Drama Performances as well as the building and footpath being used for viewing sports
4. Impact of visitor parking in relation to Drama Performances
5. Impact on neighbours arising from the building and footpath being used for viewing sports
6. Potential for significantly extended hours of use

11. Proposal does not meet policy requirements

Relevant policy

NPPF paragraphs 95, 147, 148 & 149

London Plan (2021) Policy S3 (Education and childcare facilities)

London Plan (2021) Policy SI 2

Haringey site allocation SA 41

Haringey Local Plan ; policies SP13 OPEN SPACES

Highgate Neighbourhood plan policy DH2.

These policy documents:

1. Emphasise that ONLY development proposals which preserve or enhance the character of appearance of Highgate's Conservation Area, the Highgate Bowl and which respect the settings of listed buildings, other heritage assets and MOL should be permitted.
2. Emphasise the need to mitigate climate change

Highgate CAAC believes that the proposals for the Richards building are NOT in accordance with these policies and must therefore be refused for the above reasons.

12. Carbon reduction targets are disappointing

1. BRUKL results provided for the proposed new building show it fails to meet required targets: London Plan Policy SI 2 Minimising greenhouse gas emissions
2. District Heating
HCAAC considers Highgate School should actively participate with other local organisations and schools to deliver as area-wide district heating installation. The very poor BRUKL result , a 'Fail', is extremely disappointing for a proposed new build.
3. Adopting the carbon offsetting route as a means of avoiding future proofing the School's building is more than a little disappointing.
4. The extensive north facing glazing would appear to be an odd choice.
5. 'Fabric First' methods should be adopted.

Conclusion

The development will be to the detriment of Highgate Conservation Area. Any community benefits are at best uncertain and of little practical effect. In the circumstances the application must be refused.

Highgate Conservation Area Advisory Committee is of the firm view that for all the reasons set out above this application must be refused.