



10A South Grove, Highgate London N6 6BS

18th May 2023

Planning Department
London Borough of Haringey
River Park House
225 High Road,
London, N22 8HQ.

For the attention of James Mead

By email

Dear Sir/Madam

Re: Redevelopment at Dyne House, Southwood Lane, Hornsey, London, N6 5EE – ref HGY/2023/0328

I am writing on behalf of the Highgate Society to strongly object to the above application. This is a lengthy application with a very comprehensive set of documents to support it, but fail to address fundamental problems with the application. This objection has been split into three. The first is whether the applications complies with previous consultations and the aims and objectives of SA41 and the SPD; the second is an objection to the specific application relating to Dyne House and the third an analysis of the Basement Impact Assessment

1. OBJECTION RELATING TO PREVIOUS UNDERTAKINGS

1.1 Consultation held on 15th June 2015

In 2015, the school embarked on its first exploration of the proposed works and a series of meetings with stakeholders was held with local community bodies. The headmaster, Adam Pettitt, and his team addressed a meeting held with the Highgate Society on 15th June 2015. At this meeting a number of questions were raised and the team gave reassuring answers to most of these, underlined by the statement that the school was in “listening mode”. Three areas were discussed; the Bishopswood Road area; Dyne House and the Island Site and the sports fields. These broadly reflect the current applications.

However, the Society feels that many of the undertakings given at this meeting have not been carried through and there has been limited engagement in the past 8 years, spite of the school stating with reference to this meeting that

“This exercise sought to respond to continual requests by stakeholders for the School to engage early in the design process and with the intent of establishing the parameters and identify the key issues for the redevelopment designs for Dyne House. Despite the subsequent reaction to this informal engagement, the exercise proved invaluable in meeting its original intent, and it has identified the key issues, which the School has been reflecting on in developing plans for the site and other School sites over the lifespan of this SPD.

Detailed notes of the meeting were taken and the following undertakings were given in response to questions regarding Dyne House. These will be dealt with further in section 2 below.

- Would trees survive the deep excavations - Mature trees on the site “would survive” although small trees may need to be removed

- Concern on construction works on listed buildings – this would be addressed
- Height of building causing lack of light to neighbours – this would be assessed
- Loss of views over Bowl – views down the side of Dyne House will remain
- Ground water – a BIA will be produced
- Will additional usage result in negative impact - the new larger facilities will need to be actively managed.
- Access to rear terraces - There are no curriculum needs for additional outside access.

1.2 Working with the community

Following the 2015 meeting there has been limited contact with the community and this is borne out by section 4 of the Education Needs Assessment (appendix 3)

Under the heading community, Sections 4.6 – 4.10 it appears that the School's position in terms of working with the community has now changed. Whilst stating that *"the School takes its role as a member of the community extremely seriously"* it appears that the School's commitment to working with the community is limited to working with the Council and not with the local community, the member of which, if these proposals are approved future, will be severely impacted by this enormous expansion.

1.3 Aims of SA41

SA41 was established after pressure from the Highgate Neighbourhood Forum and others to ensure that the programme of development for Highgate School presented a reasonable and coherent strategy. The school undertook at that time to look at a mutually beneficial arrangement between the school and community as confirmed by the note below.

SA44 Highgate School

The Forum welcomes the exploration of how school facilities can be enhanced while benefitting the local community.

It appears in this latest submission that the exploration has led to the required enhancement of the school's facilities but without any benefit to the community. This is massive building programme more than doubling the floor area of the buildings of the estate. Much of the estate is in a cramped village centre site where any expansion will have a huge impact on the community, both the residents and the other users, both during and on completion of the works. The School should detail how they think the works have benefitted the community.

1.4 Justification for the expansion of Dyne House

It had been hoped that as part of the SA41, a strategy would be produced which would explain the various proposals and how they would be executed to ensure benefit to the community.

Overall, in broad figures, the school is looking to double its floor area over all its sites. However, against this, the pupil numbers are capped at existing, which does beg the question as to why this level of expansion, with the damaging effect on the fabric of Highgate, can be justified. The Education Needs Assessment paper seeks to address this, having allocated Dyne House as a dedicated sixth form and music centre including a theatre. The assessment states that

"The previous Dyne House plans incorporated classrooms which would have enabled a reduction in the usage rate to a more sustainable level, providing desired flexibility and allowing for contingencies. These factors mean the additional floorspace needed at Dyne House for a VIth Form centre and the Music Department can be kept to a minimum"

This additional floorspace is a 116% increase over the existing Dyne House floor space, which makes a mockery of the statement that the school is keeping development in this most sensitive area *"to a minimum"*. The Society is also at a loss to know why the school needs another performance centre (theatre) when it is also proposing one in the Richards Centre. Possibly the existing theatre space in Dyne House could be repurposed and the theatre space proposed for drama in the Richards Centre be shared with music.

2 OBJECTIONS TO DYNE HOUSE PROPOSALS

2.1 Increase in gross floor area:

The prime cause of concern with this application is the increase in floor space on the Dyne House site which has a consequential impact on the neighbouring environment. The gross area of internal floor space is increasing by 116%, of which all but 3% is to the rear of the existing building. In addition to this, there is a considerable amount of external amenity space being provided for the pupils. This part of the school estate is probably the most sensitive of all the sites, being both on the fringes of the Bowl area and closely adjoining residential properties, many of which are statutorily listed. The various impacts of this scale of development are listed in more detail below.

2.2 Recladding of Dyne House

Recladding Dyne House is justified on the need to carry out repairs and to improve insulation based on the School's view that the appearance of the building is a negative contributor. This is not supported by clause 4.4.86 of the Highgate Conservation Area Appraisal which designates Dyne House "*.....a good example of its time*". It is the siting and massing which does not reflect the context of Southwood Lane which is open to criticism. However it is not proposed to alter this.

This view is reflected by of the 20th Century Society, who have written a strong objection to the destruction of the existing façade. Their view is that the building is an important example of this period of architecture, being designed by a significant architect. They are pressing for local listing of the façade. There appears to have been no acknowledgement that this claim might have some validity nor any examination as to whether improvements and repairs can be carried out without impacting on this heritage aspect of the building, other than to state the façade has deteriorated. Fabric disrepair is not a justification for demolition.

The design of the proposed new street elevation is clumsy and lacking subtlety. It does nothing to enhance the Conservation Area and thus its replacement would be in breach of the Chapter 16 of the NPPF. The glazed front extension has ugly framing and will further project into Southwood Lane. Being fully glazed over 3 floors there will be extensive light pollution onto the street and adjoining properties. The cladding of the tower is crude and unresolved, destroying some excellent brick detailing. The new scheme involves fully sealed windows, unlike the existing where the windows are double hung, opening sashes with secondary glazing, and any existing sustainable solution has been abandoned, requiring artificial rather than natural ventilation.

In conclusion the existing elevations are a fine example of a sub Brutalism, a style which previously having fallen from favour, is now being recognised for its quality and robust detailing. By comparison. Its replacement is mundane and poorly detailed and does nothing to enhance this important setting.

2.3 Impact of buildings to rear:

The bulk of this development, making up the 113% increase in floor area, is made up of a substantial new building complex to the rear of Dyne House, involving greater height and nearly trebling the site coverage in this area. Much of the accommodation to be provided is below ground thus involving extensive excavations with impact on hydrology. The possibility of retaining and refurbishing the existing buildings has been raised in previous consultations but rejected by the school mainly on the grounds of their poor condition. However, the plans indicate that the reasons for not retaining the existing buildings are more likely to be that they cannot provide the amount of additional accommodation required by the school for this site.

The combined impact of Dyne House and the new rear buildings will be of a 9 storey building facing onto the Bowl area with resultant light pollution negatively impacting on this very special designated SINC area. The lowest building is two storeys onto the boundary with the "green line" designated in the Neighbourhood Plan as open space and the lowest floor extends (level-0.5) into the green area where building is not acceptable. The impact on the setting on the Heritage Assets of not only the Bowl but also the adjoining listed buildings will be considerable as also will the impact on the amenity of adjoining residential properties

2.4 Roof terraces

The ground floor foyer opening off Southwood Lane is to be designated as a sixth form common room. Currently this space serves as an entrance foyer to Dyne House and the lecture theatre below and is intermittently used for events such as receptions, exhibitions and as break out space after lectures. The sixth form common room opens directly onto a south

facing terrace providing spectacular views over London. Rather than occasional use as currently, this terrace will now have extensive use by students during warmer weather and will also create a considerable noise nuisance and loss of privacy for the residential properties immediately adjoining this and beyond.

There are 4 other roof terraces shown on the Landscape GA Plans, including the Library Terrace and Southern Terrace plus 2 small terrace at the bottom of the site. Three of these are close to the boundary with the neighbouring gardens to the west which will severely impact on both the visual and aural privacy of the adjoining residents.

2.4 External spaces

The notes of the 2015 meeting indicate that there will be no additional external spaces associated with Dyne House. However, the Landscape GA drawing numbered HS-DH3-LDA-ZZ-00-DR-L-100 and produced by LDA Designs indicates otherwise. As above, there are a number of additional roof terraces which will be accessed by the pupils and will lead to loss of privacy and noise problems for the adjoining residents .

There are also a number of external amenity spaces for use by the pupils . These are generally located close to the boundary with the gardens of the adjoining residential premises. This is particularly noticeable on the old Parade Ground site where a games court, climbing frame and table tennis table area are sited adjacent to the boundary with the Kingsley Place houses which have small gardens. Not only will the gardens suffer from noise and loss of privacy, but bearing in mind the gardens are small, so too will the rear rooms of the houses. There is considerable capacity for intense noise generation from these activities as well as general pupil noise which will result in intolerable living conditions for the neighbours,

Whilst considerable thought has gone into shielding the new development from the gardens of the houses to the south of the new buildings through planting and tree retention, nothing has been done to ameliorate the impact to the north, the land adjacent to the boundary being a hard paved access way without any planting.

2.5 Parade Ground

The current parade ground at the lower end of the site is designated within the “green line” of the Bowl Area as set down under KS3 of the Highgate Neighbourhood Plan. The Landscape GA Drawing indicates that the usage of this will be a multi use games area (MUGA), fire access and subsidiary games areas, all extensive hard surfaces. The noise issues this will create are mentioned elsewhere.

However, this represents a huge lost opportunity for the school to contribute positively to the environment and calls into question its commitment on sustainability given in its earlier meetings with the community. The intention of the designation of this within the “green line” of KS3 of the Neighbourhood Plan as open space would be to create a place of environmental benefit. This area would be much better used as a wildlife area which would form a buffer between the new development and the Bowl Area as well as the adjoining residential properties to the north in Kingsley Place. This could also provide a welcome facility for the pupils for quiet study as well as informing them on environmental issues.

It should also be noted that competitive sports are, by their very nature, noisy and the impact of this on the neighbours will be considerable. There is mention of this being for use by the community but there are ample sport facilities elsewhere on the School's estate which would be a much less intrusive setting for a MUGA.

Finally it should be noted that part of the building, the plant area, extends into the area enclosed by the “green line” and thus protected against building.

2.6 Vehicle access from Kingsley Place.

Currently there is restricted vehicular access from Kingsley Place onto the Parade Ground area. There is mention of the Parade Ground as a holding ground for the works during construction which is causing alarm for the Kingsley Place residents. This is obviously a Construction Management issue ,but such is the scale of the building work and excavation that this will have a considerable impact on the cul de sac of Kingsley Place. This should not be Conditioned but should require approval as part of this application and then strict adherence to the CEMP should be required.

In connection with this, the proposed plans for this area show the existing access widened to provide full vehicular access on completion of the works for fire access to the site. This then runs up the side of the site to the rear of Dyne House, gradually reducing in width. Whilst great care has been taken to ensure the green screening is maintained on the boundary with the houses to the south on Southwood Lane, the aspect facing the rear houses of Kingsley Place and the rear of the South Lane Houses to the north has been completely ignored.

2.7 Mature trees

An undertaking was given that no trees would be felled. The plans show otherwise, in particular, a row of mature trees running across the site and the felling of a tree for the Kingsley Place access. There are also doubts about the impact of the deep basement works on ground and surface water flow and thus eventual health of the trees to be retained.

2.8 Mechanical and electrical plant

The very thorough MEP Report by Aecom Ltd indicates that heating and cooling will be achieved through the use of a Ground Source Heat Pump (GSHP). This is to be welcomed and the Society has no further comments on this element of the proposal.

However, the issue of ventilation remains, with a majority of the new building requiring mechanical air supply and extraction. Currently the existing Dyne House is naturally ventilated in its entirety with double hung, opening sash windows with secondary glazing which provide natural ventilation with acoustic protection in summer and thermal insulation in winter. This is to be replaced with sealed glazing and mechanical ventilation. In addition there is an extensive below ground teaching accommodation being provided, particularly in the rear block which will require artificial ventilation.

Although considerable allocation of space for plant has been provided in the basement, there is no detail of where the external plant will be located. Artificial ventilation of the scale will require ducting and air handling units, all of which are visually intrusive and noisy. These will negatively impact on the amenity of the neighbours, but it is difficult to ascertain the extent and location of these in an otherwise comprehensive submission.

2.9 Drainage

Extensive information is given on surface and ground water drainage and compliance with SuDS requirements. However, a number of points seem unresolved both on the impact on immediate site and adjoining sites and also on the impact of the hydrology of the wider area.

Effectively the building cover, and thus the hard surface, of the rear area between Dyne House and the Parade Ground is being more than tripled, resulting in a substantial increase in surface water run-off. Coupled with this is the fact that it is proposed that the basement will be constructed with a piled retaining wall which will create a coffer dam effect across the fall of the site, thus causing ground water to divert onto the neighbouring properties, the gardens of which could possibly become water-logged.

It is proposed that all surface water run off will be taken by the existing sewers. This is a hydrologically sensitive area being the source of underground streams including the Cholmeley Brooke which runs rises in the Bowl area. It does not appear that sufficient attention has been paid to this wider impact.

It would have been hoped that more attention to reducing water run off would have been made including the use of swales, porous surfaces etc. However, in section 3, we have gone into an analysis of the BIA and the Society understands that reports are being commissioned by concerned neighbours in relation to this, so will do little more than flag this as a concern at this stage.

2.10 Noise levels

As mentioned in the sections above relating to plant and the use of external spaces, by pupils, noise levels emanating from the site could be a major cause of nuisance for the neighbours who have for many years enjoyed a peaceful and quiet environment to the rear of their houses. Although a Noise Report is included in the application this is very unspecific and refers only to mechanical plant. In terms of mechanical plant what is not shown is where this is to be located and the likely noise levels.

As regards noise nuisance arising from use of the outdoor amenity space by the pupils, the application fails completely to mention this. Many of the external amenity spaces closely

adjoin neighbouring residential properties, in particular rear gardens and during school time there is the potential that noise levels resulting from the pupils will make life for the adjoining residents intolerable.

2.11 Impact on Highgate Bowl

The proposed development faces directly onto the protected area of the Bowl which is covered by its own site allocation, SA42. It is also a SINC Area which reflects its importance in terms of ecology. This scheme has the potential to damage this considerably as is contrary to statements in SA41, namely *“The objectives of the Highgate Bowl site should be considered on any properties that fall into this site allocation”* and *“Any Masterplanning should give appropriate regard to the open character of the Bowl”*

The Conservation Area Appraisal states *“The open character of the Bowl is essential to the character of the conservation area”*. This will be harmed by the extensive building down the slope from Dyne House, terminating with a heavily glazed 2 storey building on the boundary of the “green line”. Specifically, the problems with the new development are:

- light pollution from the extensively glazed rear elevations,
- the appearance of a 9-10 storey building looming over the Bowl exacerbated by the fall in the land
- the presence of so much hard surface and inadequate SuDS measures adjacent to the Bowl,
- the impact of the extensive basement on the hydrology of the Bowl
- the removal of existing wildlife habitat

3 BASEMENT IMPACT ASSESSMENT

3.1 The Basement Impact Assessment of 16 January 2023 was prepared by Squared Studio Engineers Ltd. (A-squared) for Expedition Engineering Ltd for the proposed development of the Dyne House and Island sites. Its sources of information include a Site Investigation Report by Geotechnical & Environmental Associates Ltd. (GEA) dated September 2015; a Highgate School Dyne House Hydrogeological Desk Study Report by A-squared dated July 2015; and a Highgate School Dyne House III RIBA Stage 2 Report dated October 2018 produced by Expedition Engineering Limited. [BIA 2.3]. Thus the raw material on which the BIA is based is from 5 to 8 years old. Borehole evidence taken more recently might show different results, as there has been climate change in the intervening period, as well as a torrential downpour causing flooding in Highgate in July 2021.

3.2 We are also told that the model geometry for the hydrogeological Assessment did not include the basements for the island structure and Dyne House front extension, which were not included in the plans as they existed at the time it was completed [BIA 6.1.4]. We are assured that their absence “are not considered to have a direct impact on the findings of the study.” This must remain open to question.

3.3 The proposed development works for the Dyne House plot comprise the redevelopment and expansion of Dyne House, the demolition of the existing Gym and Geography Building behind it, excavation of a one- to two-storey teaching facility in its place. The Dyne House expansion will involve the excavation of a one-level basement adjacent to the existing basement. [BIA 1.1.4] The proposed development on the Island plot comprises the demolition of the existing structure, excavation of a one-level basement, and construction of a two-storey structure (BIA 1.1.5).

3.4 The ground conditions beneath the site vary because of its sloping nature, comprising

- Made ground to a depth of 1.0 to 1.5 metres bgl;
- Bagshot Formation to a maximum depth of 11.5 mbgl, but which reduces from west to east, and does not appear under the eastern sections of the site;
- Claygate Member, which has not been proven by site-specific ground investigation works. Based on BGS boreholes in the vicinity of the site it is expected to be at least 20m thick and is underlain by the London Clay Formation present to depths of approx. 129mbgl. [BIA 1.1.10].

3.5 The existing Dyne House structure will be extended towards Southwood Lane, the extension including the excavation of a one-level basement connected to the existing basement. The excavation depth is 4.0 m. [BIA 2.6.3]. The one- to three-level basement in the new Rear

Block will have an excavation depth of from 4 mbgl to 11 mbgl due to the sloping nature of the site. [BIA2..6.4] The average excavation depth for the Island site is 4.6 mbgl. The scale and variation in depth of these excavations will have an effect on the stability of the land and the groundwater flow.

3.6 It is stated that “Temporary props/shoring will be installed prior to proceeding with bulk excavation works” to reduce the risk of adversely affecting neighbouring structures and third-party assets, due to excessive ground movement. [BIA 2.6.8].

3.7 Attention should be paid to BIA 3.1, the Subterranean (Groundwater) Flow Screening Flowchart at BIA 3.1, p.8. It reveals that:

- The site is underlain by the Bagshot Formation and Claygate Members both Secondary Aquifers;
- 1b The proposed rear Block basement in the east of the Dyne House site will extend beneath the water table surface;
- The boundary between the Bagshot Formation and the Claygate Member is a potential spring line;
- There will be an increase in the amount of hard standing area [at present already substantial];
- Although the chart maintains that the proposed development will maintain the existing surface water discharge conditions the increase in hard standing is likely to affect this discharge;

3.8 The Stability Screening Flowchart [BIA 3.2] shows that

- The Dyne House plot includes slopes of approximately 8 degrees;
- Adjacent properties have a similar sloping topography to the site;
- There may be slopes with gradients greater than 7 degrees;
- Trees will be felled in order to enable the construction of the Dyne House front extension and to allow site access from Kingsley Place;
- The Claygate Member and London Clay strata can be classified as having a high volume change potential and hence can lead to seasonal shrink-swell subsidence where buildings are founded in dessicated soils; these conditions exist on the eastern part of the site.
- The site is within 100m of a watercourse or potential spring line: the boundary between the Bagshot Formation and Claygate Member is a *potential* spring line;
- The site is within an area of previously worked ground, with a significant thickness in the eastern sections of the site;
- The site is underlain by a Secondary “A” Aquifer, and the proposed basement will be beneath the water table surface, especially for the Rear Block eastern sections of the site. Dewatering is likely to be required during construction;
- The site is within 5m of a highway (Southwood Lane), and Kingsley Place bounds the site to the north.
- The differential depth of the foundations of the existing development relative to neighbouring properties will increase, especially in the case of the Island plot;
- There is a Thames water sewer onsite, running north-south immediately east of the existing Dyne House auditorium.

3.9 The Surface Water and Flooding Screening Flowchart [BIA 3.3] states that

- The proposed basement development will increase the amount of hard standing area present.
- There are areas of low to high flood risk surrounding the eastern section of the site.
- This information is summarized in BIA 3.4, Non-Technical Summary of Screening Process, which could be included verbatim in your submission.

3.10 The following Scoping section expands on the findings in the Screening Section, which can be used to expand on the problems highlighted in it. [BIA 4.1 – 4.7.4]. It describes the mitigation measures which will be necessary to minimize the damage described in the screening charts. They are extensive, and it may be questioned whether substantially all risk of damage can be avoided.

3.11 Site Investigation, BIA 5:

Table 1, Depth to Groundwater shows that standpipe measurements were taken on 15/4/2015; 27/5/2015 and 9/6/2015. The results were monitored over the period from May to

June, but not during the autumn or winter when flows may differ. Even so, a perched water table in the Bagshot Formation and Claygate member was encountered. The presence of perched water was confirmed by the data elicited from Vibrating Wire Piezometer (VWP) monitoring by GEA. It should be noted that the Hydrological Assessment carried out by A-squared in 2015 is based partly on a desk-based review of data obtained during a limited period in 2015.

3.12 Conclusions of the BIA, Section 8:

3.12.1: Land Stability/Slope Stability

The BIA concludes that there is a risk of movement to the development due to volumetric changes of the Claygate Member and London Clay Formation. Evidence of seasonal shrink-swell has been observed during site-specific ground investigations. The scheme design development will consider heave mitigation measures (if appropriate) and the relevant soil structure interaction Mechanisms. [BIA 8.2.1]

The Ground Movement Assessment has concluded that ground movements caused by excavation and construction of the proposed development will be limited, assessed as Category 1 –Very Slight according to the Burland Scale. However this must be taken on trust. [BIA 8.22].

Preliminary assessments of the impact of the proposed works on the Thames Water sewer running through the site indicate that induced movements do not exceed Thames Water criteria, but it should be stressed that these assessments are preliminary. [BIA 8.2.4].

The BIA concludes that the risks to the adjacent properties, slopes and infrastructure is limited and will be “mitigated in a reasonable fashion as part of the design development.” However there is no guarantee that this will be the case. [BIA 8.2.5]

3.12.2: Hydrology and Groundwater Flooding

Although the BIA has concluded that there is low risk of groundwater flooding, it has identified that construction of the proposed rear basement is likely to result in a local increase in groundwater head of approximately 2m; in the areas surrounding the proposed basement this effect is stated to be “lesser.” It alleges the alterations to the local groundwater flow regime due to the proposed works are expected to have a limited effect on the neighbouring properties.

3.12.3. Hydrology, Surface Water Flooding and Sewer Flood

The BIA concludes that there is a very low to low risk of surface water flooding although it has found that the amount of hard standing on the developed site will be significantly increased.

By and large, there is material in the text of the BIA which suggests that there is a reasonable chance that damage will be occasioned by the large excavations required for the new basements, though it is claimed that mitigation will reduce the damage actually caused to very limited levels. It is feared that the true risk of damage will only become apparent during the carrying out of the works, and will have to be dealt with at that time. Whether this is adequate to give comfort to the owners of 12 and 16 Southwood Lane and 23A and B Kingsley Place, described as the closest buildings to the Dyne House plot, is doubtful. At present there are only “outline structural arrangements” and a Construction Methodology and Management Plan which have not been reviewed.

4. CONCLUSION

The Highgate Society strongly objects to the proposals for the Dyne House site for the following reasons:

- 4.1 Substantial harm to the setting of the Heritage Assets adjoining the site including the statutorily listed properties of Southwood Lane and the SINC Bowl Area

4.2 Impact on the amenity of the neighbours through overlooking, loss of privacy and increased noise levels

4.3 Impact on bio diversity by the increase in hard standing and built form

4.4 Impact on hydrology of the area through extensive basement works

4.5 Poor quality of much of the design which will not result in any enhancement of the Conservation Area.

In conclusion this scheme represents gross overdevelopment of what is one of the most sensitive sites in Highgate. Whilst the Society does not object in principle to development on the Dyne House site, it should be carried out with more sensitivity to reflect its setting. It is hoped this application will be withdrawn to be replaced by a more apt solution following more consultation with the community..

Yours faithfully,

Elspeth Clements BA, BArch (Hons), RIBA, CA, FRSA
Highgate Society Planning Committee