

Highgate Conservation Area Advisory Committee

2 MAY 2023 HGY/2023/0328: DYNE HOUSE PLANNING APPLICATION

1. Introduction

Highgate Conservation Area Advisory Committee objects to HGY/2023/0328, Dyne House planning application.

Redevelopment of Dyne House, to include: 1) Retention, refurbishment, extension and basement works to the principal five storey Dyne House structure (plus plant and lift over run); 2) Demolition and redevelopment of the rear extension and associated buildings to the rear, with erection of a new part one and part two storey structure, together with new basement levels; 3) Retention of the Parade Ground open space, with new multi-use surface; 4) Associated improvements to the Island Site access and underground tunnel, including: demolition of existing service block and erection of a replacement part one and part two storey structure; and 5) Associated landscaping and improved provision for emergency services, servicing and disabled parking.

These are the objections of Highgate Conservation Area Advisory Committee (“HCAAC”) to the above application for proposed works:

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/2023/0313:	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
- Haringey Local Plan
- Highgate Neighbourhood plan
- The London Plan (2021)
- Haringey Site Allocations 2017 SPD: Highgate Bowl
- Highgate School SPD 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 Land should be permitted.

HCAAC believes that the proposals for Dyne House are NOT in accordance with these policies and therefore must be refused.

As can be seen from the table below the increase in the gross area (GEA) amount is:

$(22,807\text{sqm} - 10,471\text{sqm}) = 11,366\text{sqm}$, an increase overall of 108%, that is more than double the areas of Highgate School's existing buildings included in all these applications. The increase for the Dyne House application is **116% of which 113% is at the rear.**

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	2,460	-	-
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 HCAAC.

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 works at the Dyne House site 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. The various applications propose wide use of 'green roofs' which Highgate School admits are difficult to maintain and which are, presumably, extremely labour-intensive compared with maintaining grass and other planting including trees at ground level.

Each of the applications, should be refused for the reasons set out in this section 3 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.

4. Summary of comments on this application

Highgate Conservation Area Advisory Committee wishes the Planning Officers and Planning Sub Committee members to understand how important the two SPDs, Highgate Bowl and Highgate School, are to the local community. We worked hard to achieve these documents. We consider this application seriously and unacceptably undermines those documents as do the other Highgate School applications. Highgate Conservation Area Advisory Committee objects in the strongest terms to this application for the following reasons:

1. Significant information missing
2. Harm to listed buildings and Conservation Area
3. Highgate Bowl SPD and Highgate School SPD requirements not met
4. Massing and form in relation to Highgate Bowl unacceptable
5. Noise and impact on neighbours unacceptable
6. Plans require clarification in relation to circulation
7. Proposed circulation route causes unacceptable impacts on neighbours
8. Impact of proposed circulation causes harm to heritage assets
9. Carbon reduction
10. Biodiversity potentially compromised: Biodiversity, synthetic turf, green roofs, trees
11. External lighting
12. Impact on Significant Open Land
13. Needs, quanta and planning balance not provided

These are our detailed comments on each of the above:

4.1 Significant information missing Please note that this list may not be comprehensive.

- Site plan showing plan of Highgate Bowl
- Site plan showing whole area of Significant Open Land in relation to the application site
- South Elevation showing ground levels of adjacent rear gardens and their boundary walls with Dyne House
- CGI from 23 A, 23B Southwood Lane and from Kingsley Place
- CGI from the south
- Section through Gymnasium and adjacent Kingsley Place gardens
- Proposed elevation of Dyne House showing realistic height of building taking into account: ceiling plenum; depth of ceiling/roof structure, depth of insulation, depth of green roof, height of parapet, plant on roof & safety railings. Amend all drawings CGIs.
- Make same amendments to 'extension' proposals

4.2 Harm to listed buildings and Highgate Conservation Area

The Forge Field and Barnwell Decisions pertain to this application, the Dyne House and Science Block listed building applications and the Science Block planning application. We find the assessments of harm made by the applicant are incorrect. We consider the level of harm by site and cumulatively is certainly at least 'less substantial' and may fall into 'substantial harm'. The

number of listed buildings in the immediate vicinity can be found in Appendix 4. The site lies in the Highgate Conservation Area, also a heritage asset.

The Highgate Conservation Area Character Appraisal December 2013 states:
(For the record, two members of our Committee contributed to the Character Appraisal.)

"4.4.86 Dyne House, a five storey and basement teaching building with Auditorium, constructed in brick and concrete, designed in 1965/66 by Ansell & Bailey..... Whilst a good example of its time, the scale of the building does not reflect the established scale and character of the street.

4.4.87 The integrity of this side of the street is restored between nos 16 - 20....."

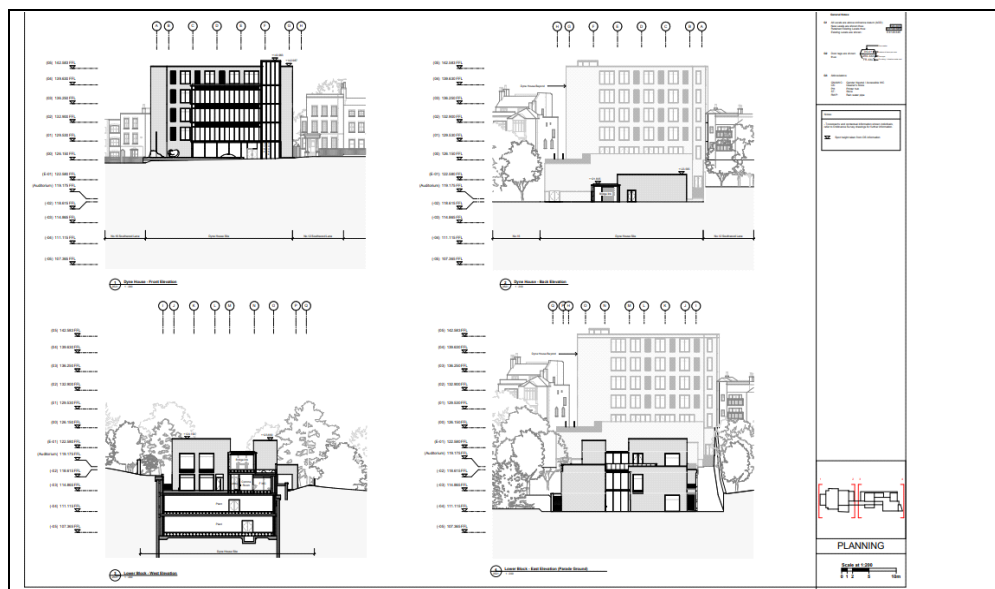
Across the board, the nine applications submitted by Highgate School would cause harm to the Conservation Area. The four applications affecting the Village would each cause harm to the setting and significance of the large number of Listed buildings listed in the attached Appendix 4 and to curtilage buildings. We argue that Dyne House is a Curtilage building.

The matters to consider with regard to the proposed changes facing Southwood Lane are:

- the change of the cladding to the concrete frame to the 'tower'
- the glazed extension in front of it, and
- how realistic is the proposal?

The design changes to the front elevation proposes two quite different elements:

- a red brick wrapping to the existing concrete frame with large windows set in brick reveals but which seeks to emulate the same proportions as the listed nos. 2 - 28 Southwood Lane, in effect a scaled up version of a Georgian house but without the hierarchy of floor and window heights of those listed buildings.
- the proposed new front extension would be fully glazed apparently to differentiate it from the 'existing' modified building. It is marginally less tall and wide and aligned with the front of Dyne House which is at an angle to Southwood Lane.



A_HS-DHS-2521_J_230113_East and West Proposed elevations [see top left drawing for front elevation]



Highgate School Dyne House & Island Site Tunnel Building | Design and Access Statement

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See DAS 9 page 57



Photo taken by HCAAC



Photo taken by HCAAC

The CGI on the previous page shows a simplified rendition of the elevation of no. 16 Southwood Lane. This house is unusual for the period because it barely has the normal hierarchy of storey heights and the proportions of the windows. We note that there is one course fewer to the second floor window than to the first floor window. Our photograph of the rest of the terrace has the usual hierarchy, that is, houses of that period have taller first floor windows than the top floor and generally slightly taller than the ground floor windows. The first floor windows reflect the status of the rooms and their taller ceiling heights.

The endeavour to make Dyne House appear to be more like its neighbours and 'fit in' to the street scene is dubious aesthetically and fails to achieve a result which overcomes the criticism of Dyne House in the Highgate Conservation Area Character Appraisal. However HCAAC must point out:

- The top floor of the existing building is set back from the front and rear facades and the roof is at 142,563
- The proposed roof is shown marginally higher not lower as claimed
- The height of the building is unrealistic taking into account: ceiling plenum; depth of ceiling/roof structure, depth of insulation, depth of green roof, height of parapet, plant on roof and safety railings.

The Heritage Statement states:

8.2 The proposals see the **lowering of the current height of the building**, presently found to have an overbearing presence on the street front. The result is **a more contextual design which sits more comfortably with the neighbouring buildings.**

8.3 "..... red brick, stone and slate is used, with the **positioning of masonry used to reference a domestic scale, echoing the residential quality of the eastern side of the street.....The impact to the surrounding heritage assets is therefore considered to be an enhancement, improving the architectural quality of their settings, including the character and appearance of the conservation area. This constitutes a moderate beneficial enhancement to the surrounding listed buildings and Highgate Conservation Area.**"

Clearly these statements are questionable at best. We do not agree with those assessments.

The assessment of the current settings of listed buildings from the rear is assessed in Heritage Statement 8.6 (see below) as 'neutral', but also finds the proposals (an increase of 113% over the existing built area stretching from the retained terrace at the back of the main Dyne House building down to and following the line of the Significant Open Land boundary) **remain 'neutral'**. HCAAC considers the sheer bulk and extent of development with associated external lighting, windows in a 'dark' area, plant which is not indicated, etc. would cause substantial harm to the setting of the neighbouring listed buildings as seen from the rear.

We therefore cannot agree with the Heritage Statement which states:

8.6 As such **the redevelopment of the site with high-quality contemporary structure is considered to enhance the character and appearance of the conservation area**. Care has been taken to reflect the existing modest scale of buildings within the site, preserving through views across the site from the north and south where these have been identified. **The area of the site to the rear of Dyne House has been found to make a neutral contribution to the setting of the surrounding heritage assets**. The **replacement of these structures with a well-designed sympathetic contemporary building has therefore been found to have a neutral impact on the settings of the surrounding heritage assets and character and appearance of the conservation area**.

Unfortunately we cannot agree with this assessment but instead consider that the sheer extent of building proposed at the rear of Dyne fails to retain the openness below the listed buildings located on the ridge surrounding Highgate Bowl. Therefore our assessment of harm is **high**.

The Heritage Statement also states: "Dyne House itself has been assessed as possessing an overbearing appearance on Southwood Lane disrupting the hierarchy and domestic scale of the buildings to the east side the Road. It presently makes a **minor negative** contribution to the setting of the surrounding listed buildings and conservation area."

Until we see corrected drawings and CGI neither we nor Haringey planners will be able to assess the level of harm.

With regard to the proposed changes to the Island Site we refer you to our objection to HGY/2023/0697.

Much has changed in architectural design terms since the 1960's. "Fabric first" [see footnote¹] has led to a visual disconnect between structural elements and facades. However none of the applications submitted by Highgate School have addressed "Fabric first" and climate change as evidenced by their poor BREEAM and BRUKL results which show the School would be, after this extensive building programme, significantly behind in reaching zero carbon.

Turning to the glazed front extension, we question the concept of masking the elevation which apparently the architects seek to hide and the need for it regarding space requirements.

At ground level (00) the front extension provides space for the stair up from the tunnel as it is well forward of the existing Dyne House facade. Circulation internally would be much more straightforward if there were a direct route from the tunnel to central corridor at the rear. Because that route is indirect it seems much more likely pupils will go directly to the external ramp at the rear but that would cause a nuisance to neighbours. As a result it would appear that only pupils with disabilities would need the glazed extension at ground floor level, in itself possibly discriminatory. Taken together these are a series of unsatisfactory design solutions.

We note Level 01 on plan the front extension encloses a void with no accommodation, service areas or circulation space within it. The CGI appears to show pupils close to the glass but that is misleading.

¹ https://www.designingbuildings.co.uk/wiki/Fabric_first

On floors 02 and 03 the existing central corridors are removed and the glazed extension provides a very wide 'bay window' facing west on those floors. Small seminar rooms are retained on the east side. The need for that extra space has not been proven.

The floor plan on level 04 retains the existing plan area, that is, there is no extension at that level. The central corridor arrangement with seminar rooms each side.

The question of 'need' to have a void on level 01 and extensions on floors 02 to 03 therefore requires justification. The question of practicality of large amounts of west facing glazing which would cause heat gain and, being full height, may make students feel uncomfortable, also needs to be justified. We do not believe the School has addressed either of these questions. The glazed 'extension' seems to:

- aim to deal with the bulkiness of a new red brick façade
- provide a very small amount of teaching/learning/study space on floors 02 & 03, the need for which is not proven
- enclose a short stair from the tunnel up to ground level with a stair lift adjacent to it

These design problems are unresolved and need to be reviewed.

So does this design proposal address the Character Appraisal comment: "*the scale of the building does not reflect the established scale and character of the street.*"? HCAAC considers that it simply does not.

We consider that the proposal would cause greater harm to the Conservation Area and to the settings and significance of the many listed buildings within that setting.

The loss of visual permeability through the building into Highgate Bowl is regretted.

The following paragraph from the Heritage Statement does not adequately address the Barnwell Decision:

8.6: At present the poor quality of the parade ground has been found in need of enhancement, detracting from the character and appearance of the conservation area. As such the redevelopment of the site with high-quality contemporary structure is considered to enhance the character and appearance of the conservation area. Care has been taken to reflect the existing modest scale of buildings within the site, preserving through views across the site from the north and south where these have been identified. The area of the site to the rear of Dyne House has been found to make a neutral contribution to the setting of the surrounding heritage assets. The replacement of these structures with a well-designed sympathetic contemporary building has therefore been found to have a neutral impact on the settings of the surrounding heritage assets and character and appearance of the conservation area.

Highgate Conservation Area Advisory Committee concludes that it simply cannot agree with the following statements in the Heritage Statement:

7.5 As such, the scheme includes the redevelopment of the site to the rear of Dyne House, creating a series of domestic scale blocks combined with careful landscaping. Limited fenestration has been provided on the northern and southern elevations, reducing overlooking into the neighbouring residential gardens. The proposals take advantage of the steep levels on site, which step down towards the Parade Ground to the east of the site. The roof of the extension includes planting to further soften through views towards Highgate Bowl to the south from the north. As such the proposal provides the opportunity to improve the quality and character of existing views within, into and out of the site towards the conservation area and Highgate Bowl.

It is proposed that Dyne House is entirely refurbished providing a materially contextual soft red brick façade, which creates a high-quality contemporary design that nevertheless improves upon the relationship between the site and surrounding buildings in terms of massing and height. The front extension has been aligned to avoid stepping outwards towards neighbouring properties, whilst resolving the current break in the street front. While the

proposals include new extensions to the wester façade, these will be lightweight and glazed in order to avoid the perception of overt massing at the upper levels.

8.2 The proposals see the lowering of the current height of the building, presently found to have an overbearing presence on the street front. The result is a more contextual design which sits more comfortably with the neighbouring buildings. While there is considerable decorative variety within the surroundings, a consistent material palette for the School buildings has been identified and this is utilised within the proposals to create a strong identity to the designs. As such red brick, stone and slate is used, with the positioning of masonry used to reference a domestic scale, echoing the residential quality of the eastern side of the street. The redevelopment of the forecourt also removes the backland quality which disrupts the otherwise consistent hierarchy to the streetscape seen in this location. As such the proposal for the Dyne House site is considered to contribute to the legacy of architecturally high quality buildings at Highgate School.

8.3 The impact to the surrounding heritage assets is therefore considered to be an enhancement, improving the architectural quality of their settings, including the character and appearance of the conservation area. This constitutes a moderate beneficial enhancement to the surrounding listed buildings and Highgate Conservation Area."

HCAAC considers the proposed scheme causes an unacceptable level of harm to the setting and significance of all the heritage assets (see Appendix 4) including the Highgate Conservation Area both from the public realm and from the rear. For this reason alone this application must be refused.

4.3 Highgate School SPD and Highgate Bowl SPD requirements not met

Highgate School and Haringey Planning Department together agreed the Highgate School Supplementary Planning Document (SPD) which was adopted by Haringey in March 2021. It requires the following but the Planning Sub Committee must understand that neither of these key requirements have been met as set out under the following headings.

- *to have regard to the objectives of the Highgate Bowl site on any properties that fall into this site allocation; [2.5]*
- *to give appropriate regard to the open character of the Bowl as well as the character of the Bishop's area; [2.5]*

The Highgate School SPD requires (relevant clauses highlighted in bold) See Appendices 2 & 3.

5.10: In delivering proposals within the Senior School and, specifically those related to Dyne House, the Council will expect the School to have regard to site allocation SA42 which relates to the 'Highgate Bowl'. SA42 seeks to protect the Highgate Bowl as open space, and to improve public access to it through limited redevelopment of Townsend Yard, Broadbent Close and Duke's Head Yard (referred to as 'the Yards').

5.11: The boundary of the Highgate Bowl (see Figure 4) abuts the southern boundary of the School's Dyne House Site..... The Council will expect the School to respond to site allocation SA42 when bringing forward any proposals for Dyne House.

5.24: The priority will be to ensure the distinctive character of the area is maintained. This includes the openness of the designated areas including the open character of the Bowl

5.42: NPPF Planning Practice Guidance also highlights, in paragraph 001, that Open Space should be taken into account in planning for new development and considering proposals what may affect existing open space.

5.97: As set out at Figure 4, the boundary of the Highgate Bowl allocation runs along the southern boundary of the Dyne House site. Development proposals that do not negatively impact on the biodiversity and visual character of the Bowl will be supported.

6.53 The 'Highgate Bowl' allocation (SA42) is located adjacent to the site. It is noted that substantial areas of private gardens to Listed houses are in the vicinity of Dyne House and lie within SA42 The Parade Ground falls outside of the allocation. However, the Council has identified that Highgate Bowl should be protected as Significant Open Land.

6.55: Refurbishment and development proposals should have regard to the following:

- *respond to the challenges and capitalise on opportunities afforded by the topography of the site;*
- *the impact on the Parade Ground;*
- *the need to respect and respond to the impact on the Highgate Bowl and the wider MOL;*
- *the design should address the streetscape along Southwood Lane, carefully respecting the character of the Highgate Conservation Area and the adjoining Listed buildings, the potential physical impacts on these buildings and their structural integrity, in their setting and their wider historic environment is preserved and enhanced (Policy SP12);*
- *the impact of redevelopment proposals on the Conservation Area;*
- *ensure massing is appropriate to the site and locality*
- *the design should consider existing context and visibility including views from Highgate Bowl; relevant policies in the Highgate Neighbourhood Plan, and aim to help achieve outcomes sought for the Highgate Bowl Allocation (SA42);*
- *the building line of any redeveloped buildings fronting Southwood Lane should be carefully considered to respect those views and streetscene.*
- *consider carefully the provision of open space and greenery on the Dyne House Site;*
- *ensure any extensions to the upper part of the site adjacent to the listed buildings respond to context, and the rich palette of materials and proportions in the existing buildings;*
- *ensure buildings are future-proofed and designed to last and contribute to the legacy of fine buildings at Highgate School;*
- *ensure that the amenities of adjoining residential properties are safeguarded in accordance with Policy DM1 and, where possible, improved;*
- *fulfil the potential of Core Objective 4 of the Neighbourhood Plan by greening the Parade ground area;*
- *the site is located in the heart of the Village and therefore the Council will expect any proposals to incorporate the highest quality of design (SP12).*

6.57 Overall, the Council will support the principle of redevelopment of the Dyne House Site, subject to detailed proposals, provided that it respects its considerable constraints including the adjacent Listed Buildings, Conservation Area, and the proximity of Highgate Bowl.

Redevelopment proposals should achieve a high standard of design and should have regard to the form, scale and materials in the surrounding area, to ensure that it makes a positive contribution to the local character.

The brief in the Highgate School SPD is plain and could not be more clear: development at the rear of Dyne House must respect SA42, the essential openness of the lands which lie within the designated Highgate Bowl. Development must also respect the designation of 'significant open land' of which the Parade Ground forms a part.

The School's response in its Heritage Statement attempts but fails to show compliance with the Highgate School SPD. There are 131 documents submitted with this application but none shows the application site in the context of Highgate Bowl; and none shows the proposals for the Dyne House site in the context of Highgate Bowl.

These extracts from all the copious material submitted by the applicant are the only mention of Highgate Bowl. Taken together the comments are disingenuous:

*7.5: The roof of the extension includes planting to further soften through views **towards Highgate Bowl** to the south from the north. As such the proposal provides the opportunity to improve the quality and character of existing views within, into and out of the site towards the conservation area and Highgate Bowl.*

The word 'further' is misleading and also this is about views from the site and not the context of Highgate Bowl as a whole.

*8.4: The proposed new buildings to the rear of Dyne House have been carefully articulated, to soften the sense of massing and providing a modulated sense of scale. This retains the modest and unobtrusive character of the site in this location, **retaining existing key sightlines towards the Highgate Bowl**. The proposals have made use of existing *typography to conceal the majority of the rear extensions, together with basement levels to further reduce a sense of height. [*We think 'typography' should read 'topology.']*

Again this paragraph is about views from the site into Highgate Bowl and not the context of Highgate Bowl as a whole.

The following statement muddles the supposed beneficial impact of green roofs and a 'greened Parade Ground' with a retained sense of openness. The Parade Ground falls within the area defined a 'Significant Open Land' in the Highgate Bowl SA 42 so there is in any case an obligation on Highgate School to retain it as Open Land. Highgate School acknowledges that green roofs can be problematic. Roof spaces may be necessary for plant to reach zero carbon in the future. We cannot agree that green roofs reduce the impact of the buildings which are adjacent to SA42 on the Highgate Bowl. That case has not been made.

It is not consistent with the required retention of openness to claim:

8.5: In addition, roof planting and a 'greened' Parade Ground with new landscaping is considered to retain a sense of openness and further filters views of the proposals from the north and south.

The remainder of the paragraph drifts into non-related matters: *As with the redevelopment to Dyne House, a contextual material palette has been used to provide a cohesive design which reflects the architectural identity of Highgate School. This is considered to resolve the presently disparate and relatively low architectural quality of the buildings within the site. The existing buildings have been found to reflect the restrictions of post war Britain and financial limitations of the School during the mid and post war period. As such they fail to embody the innovative or decorative quality seen elsewhere in the school grounds.*

The paragraph above, in terms of views and openness, relates only to the preservation of extremely limited views across the site.

We deal elsewhere with the Heritage Statement which fails to appreciate the value of the Gymnasium. We would not ordinarily expect a building of importance to be demolished because it had been allowed to become 'derelict' although it was in use until recently. Please refer to Appendix 5.

The following clauses also fail to make the case for retaining openness

DAS PART 4 PLANNING POLICY CONTEXT: 4.4 BOWL

HERITAGE STATEMENT: 7.5

HERITAGE STATEMENT: 8.5

HERITAGE STATEMENT: 8.6

4.4 Massing and form in relation to Highgate Bowl unacceptable

Highgate School SPD 6.55:

6.55: Refurbishment and development proposals should have regard to the following:

- *the need to respect and respond to the impact on the Highgate Bowl and the wider MOL;*
- *ensure massing is appropriate to the site and locality*
- *consider carefully the provision of open space and greenery on the Dyne House Site;*

From a very careful consideration of the proposals the following is clear:

- a comparison between dwg. nos. 2100 D, dwg. no. 2425 M, 2221 G and para 3.4 (P22) of the DAS shows the Gym Building and Geography Building (sometimes referred to the Drama black box studio) is tiny compared with the scale of the accommodation proposed. The Gym presents a short end elevation to the Parade Ground (Significant Open Land); and the Drama building a short end elevation to the rear gardens of nos. 6 & 12 Southwood Lane. The effect on the Parade Ground and on neighbouring gardens is therefore minimal. It is acknowledged that the Gym Building is placed prominently in relation to houses in Kingsley Place however DAS (3) on page 22 shows the existing Dyne House North elevation. On it there is a bold dotted line at the level of the ridge of the Gymnasium which states: "*Height of proposal not to exceed existing building heights.*" That ridge is at 123580 AOD therefore new building heights should be no higher than that level. It should be noted:
 - that ridge is set back from the adjacent gardens by approximately 11m (refer application dwg. A/HS-DH3 2221G).
 - as proposed we note from Anstey Horne's dwg. no. ROL7552_05_006 which is their 3D Model that the roof parapet to the lower lift tower and staircase is at 123,890 AOD; and the parapet to the Electronic Library is at 123,550 AOD. As we have said in the previous bullet point the Gym ridge is at 12,580 but the ridge is, of course, further from the Kingsley Place neighbours than the proposed rectilinear forms of the proposed building. As we have pointed out, but it is worth emphasising, the ridge is 11m from the neighbours' boundaries and therefore the proposed scheme does not meet the requirements of SPD 6.55 to 'ensure massing is appropriate to the site and locality'.
 - not only does the proposed accommodation extend full width (except for access routes each side) for the whole of the site at the rear of Dyne House, as can be seen on the sections of dwg. nos. 2521 J, 2620 K and 2621 K, but it fills the whole space from the back of Dyne House to the boundary of the Significant Open Land. In fact, the basement extends below the protected Significant Open Land.
 - from whatever point of view is taken, whether from residential neighbours' windows or gardens or, significantly in planning policy terms as well from various viewpoints looking into or across Highgate Bowl, it is unarguably the case that the requirements of the Highgate School SPD which references the Highgate Bowl SPD as covered under our headings 1 and 2 above have completely failed to be met.

On this point alone this application must be refused.

The following clauses also apply:

DAS PART 3 P22

HERITAGE STATEMENT 8.4

4.5 Noise and impact on neighbours unacceptable

There is insufficient evidence to satisfy concerns about 'Noise Breakout' and therefore the requirements of Haringey's Development Charter, DM1 have not been met.

Highgate School SPD 5.29

5.29 Development proposals should promote pedestrian linkages for pupils and staff through the School Site. New School buildings and spaces should be inclusive and accessible to all with roads and pavements, and the spaces between buildings, fully accessible. Proposals should ensure good quality access and circulation arrangements, including improvements to existing routes and

footways to cater for the needs of those with disabilities. Specific regard should be given to the relationship of the School's amenity areas to sensitive neighbouring uses. Where possible, measures to improve the existing situation should be explored including the location and/or proximity of external areas.

and Highgate School SPD 5.32:

5.32 The Council will support development that ensures a high standard of privacy and amenity for the development's users and neighbours.

DAS PART 3: P21 NOISE BREAKOUT

"Dyne House is adjacent to a number of residential properties, on both Southwood Lane and Kingsley Place. The design proposal will carefully consider the effect on these buildings in regards to noise breakout and overlooking issues."

The plan relating to this quotation shows consideration is needed to be made in relation to properties on Southwood Lane north of the site and just one property in Kingsley Place. It is not clear what consideration has been given to ameliorating measures. See also our section '*Plans require clarification in relation to circulation*' below. On the face of it disturbance for neighbours is inevitable as the E-W route on the north side of the site is likely to be heavily used as are the small courtyards. The Library Study Terrace and Northern and Southern Terraces may cause a nuisance as may the Electronic Library itself as the form of construction of and position of windows in that element are not clear. (DAS PART 8 P56 LIBRARY STUDY TERRACE and LDA DESIGN Dwg. no. HS-DH3-LDA-ZZ-00-DR-4-100).

There are a number of windows and external spaces which are likely to cause distress to neighbours. This list of rooms or spaces overlooking neighbours may not be complete:

Dwg no. 2521 J:

- Electronic Library
- Library Study Terrace (to north and south)
- east/west routes on either side of site

Dwg no. 2620 K:

- Section 1: Seminar rooms 6 & 12
- Section 2: Seminar room 10
- Roof garden
- Courtyard Terrace on south side
- east/west routes on either side of site

Dwg no. 2621

- east/west routes on either side of site
- we note there is an existing tree in the courtyard next to the 'Bridge' which is not shown

There are also locations where the heights of the proposed building ('extension') are unacceptable for neighbours. These include:

Dwg no. 2521 J:

We note the excessive heights close to garden boundaries as follows:

- section 3: 6.5m above ground level to south;
- section 3: 4m and 9m above ground level to north

Dwg no. 2620 K:

- The Auditorium Store/Stage Circulation especially given the acute angle between the Dyne House boundary and the rear wall to no. 21a Southwood Lane
- Electronic Library

Dwg no. 2621:

- section 1: 5m on south side of site with bridge link (all glazed)

We note that on plan -03 Seminar Room 3 has no daylight, presumably to prevent overlooking gardens in Kingsley Place. Seminar Room 5 could cause overlooking and privacy issues for neighbours as could Seminar Rooms 9 - 12. The outdoor space to the west of Seminar Room 9 would have a noise impact on neighbours.

The table tennis and games area immediately adjacent to the small rear gardens of houses in Kingsley Place and are on Significant Open Land would surely fail the Haringey Development Charter.

There is also the impact of artificial light impact on neighbours and wildlife to be considered. Information on proposals need to be provided and must not be left to Condition given the sensitivity of the site and surroundings.

Please note that the above list of impacts may not be comprehensive.

Overall the increase in area and volume at the rear of Dyne House amounts to unacceptable development in terms of:

1. Severe impact on openness of the Highgate Bowl and not compliant with policy Highgate School SPD and the Site Allocations (Highgate Bowl) SPD.
2. Severe impact from noise for neighbours therefore not compliant with DM1
3. Unacceptable heights on both sides in an area of large gardens and general openness, some of which lie within the designated Highgate Bowl are not compliant with policy in Highgate School SPD or Highgate Bowl SPD.

4.6 Plans require clarification in relation to circulation

The drawings showing the escape stair adjacent to no. 16 Southwood Lane seem to indicate:

- there is a route from the tunnel to the external ramp on the north side of the site
- if that is the case it would cause a nuisance to neighbours and it would not be accessible to pupils with disabilities
- it would seem there would be a route for able students to reach the external ramp via the foyer to the auditorium (Level -01). Is that a fire exit?
- there seems to be no entry/exit or escape route from the Control Room on Level -01, the route being blocked by a chair lift
- the documents state that fire safety would be dealt with later. It would be prudent for matters of fire escape to be dealt with prior to making a Decision on this application

4.7 Proposed circulation route causes unacceptable impacts on neighbours

The existing circulation route is described, as far as it goes, as follows in Part 10 of the DAS:

Under the heading 'Cycles':

" *Provision for cycles*

The Senior School operates on the principal of all staff, pupils and visitors arriving at the Reception in North Road for security and control reasons....."

"*Entrance into the building*

*There is a single principal entrance into Dyne House from Southwood Lane, serving both the Sixth Form Centre and the Music Department. There is an additional entrance located at basement level from the pedestrian tunnel which provides direct access into the Informal Assembly Area. Fire escape exits are provided from the north and south stair core's within Dyne House and at the east end of the rear extension. **Visitors to Island Site Building will arrive at street level into the new lobby providing direct access into the Central Hall. The external staircase and lift provides first floor access to the Central Hall and Chapel Quad**" (HCAAC's emphasis) under the heading 'Entrance into building' on page 83 of Part 10 of the DAS.*

We note that the current Senior Common Room in Central Hall becomes unusable because it would be so dark. The classrooms at the level of the walkway would also have a reduced level of daylight and lessons would be disturbed by large numbers of pupils using the proposed route.

HCAAC asked for a site visit in order to be able to understand this key factor - the need for a new circulation route - but we have had no reply. We find this very unsatisfactory. As it stands there is no justification whatsoever in any of the copious documentation for the external location of the walkway, lift, etc.

The proposed new circulation route, in particular the first floor walkway, would not meet the requirements of Haringey's Development Charter. Neighbours opposite in Southwood Lane whose bedrooms and bathrooms on their first floors are at the level of the proposed walkway would be adversely and unacceptably impacted in terms of privacy and noise in particular by this application.

4.8 Impact of proposed circulation causes harm to heritage assets

Please refer also to APPLICATION FOR LISTED BUILDING CONSENT HGY/2023/0679: Dyne House Listed Building Consent for works to the Island Site including: demolition of existing service block and erection of a replacement part one and part two storey structure, together with associated works.

The Highgate Conservation Area Advisory Committee (HCAAC) has submitted its objection to this application.

Demolition of the service block

The HCAAC does not object to the principle of the loss of this block, a utilitarian one-storey brick structure added in 1899, which has no architectural or historic interest. CGIs in the DAS and Heritage Statement indicate that the two original Gothic windows on the northern return of the Big School (of which the stone apexes are visible above the flat roof of the toilet block) would be exposed/restored - potentially a major enhancement.

Are these window arches known to survive in whole or part? If so, they may require careful repair/restoration and this should be explicit in the application drawings and associated documents. However, this element of the scheme is otherwise given scant attention - no elevation is provided showing the reinstated windows.

Erection of part one-and two storey structure and associated works

The Central Hall was added in 1899 to the design of CP Leach. While accepting that the east elevation was afforded less architectural elaboration than those facing south and west, it is nonetheless a worthy component of the design and which figures prominently in views from Southwood Lane. We consider that it makes a positive contribution to the Conservation Area and to the setting of the Grade II listed Big School.

The HCAAC has major concerns about the impact of the proposed extension to the façade. While the Heritage Statement claims: "*the use of a colonnade is an existing design feature of the Central Hall and reflects the elevation of the central block to the main entrance of the school*" we consider this to be misleading when applied in this particular context. We consider that the proposed structure lacks any architectural relationship with the existing building, and would be an incongruous addition that would spoil the integrity of the façade, losing the attractive stone first-floor window which would be converted to an entrance. It would also, surely, significantly reduce daylighting to the classrooms behind? We strongly question whether this is the only solution to achieving the circulation route objectives and whether the access and circulation requirements could not be met within the existing building.

The extension would also impinge on the view looking north-west towards the Science Quad from Southwood Lane. It is important to note that this view would also be compromised by the proposed extension to the Science Block, to which the HCAAC has also strongly objected (HGY/2023/0317). There are no CGIs showing the two proposed extensions together, although this information has been requested. It is therefore essential that the cumulative impact of both these proposals be considered together, and we have commented accordingly in our response to the associated planning application.

We are concerned about the impact of a basement so close to the foundations of the Big School.

We also comment that it is difficult even for professionals to comprehend the drawings fully, given the complexities of the existing and proposed arrangements. The levels shown on the drawings are confusing and appear to relate to Dyne House. For this reason, it is disappointing that our requests for a site visit, which we consider to be reasonable coming from a CAAC, have received no response.

Conclusion

While the removal of the toilet block (subject to the careful restoration of the north return façade of the Big School), would be beneficial, the extension would significantly harm the elevation of the Central Hall, considered to be a curtilage listed building, and the setting of the Grade II listed Big School. Moreover, we are very far from convinced of the justification for the extension. The proposal as a whole would require significant amendment in order to receive the support of HCAAC. We therefore strongly recommend that the listed building consent should be refused.

4.9 Carbon reduction

Note: the commentary below supersedes Appendix 1 re UKBRL

HCAAC considers it would be very costly and disruptive both to the School and to neighbours and local residents to retrofit the proposed building which is to all intents and purposes a new building only targeting BREEAM Very Good. That leaves a long way to go to achieve zero carbon by 2050 with the added impact of the lost opportunity to reduce carbon emissions in the meantime, probably less than 10 years after the completion of construction and yet more disruption and inconvenience locally.

HCAAC is very disappointed with the proposed poor target and lack of concern about climate change.

The Energy Statement states:

- Cash in-lieu payment of £48,645 will be made to Haringey for failing to meet policy requirements. The continuing impacts on climate of poor energy efficiency are not defrayed by a single payment to the local authority.
- **3.1 re BRUKL:**
 - 1) Be Lean: the **building does not comply with Building Regulations Part L 2021.**
 - 2) **As designed building fabric compliant although on the assumption there are 'no high use entrance doors in building' but BRUKL results states 'Personnel doors - fail'**
- Future weather conditions require retrofit and additional mechanical ventilation, etc.
- Basement levels in the 'extension' largely prove difficult to treat as do the Electronic Library and Informal Assembly Area
- Solar gain limit exceeded in the Quiet Study Area on Level -03 by 340.3%
- The glazed extension on Southwood Lane where it provides additional study space is dealt with by high performance glass, projecting fins and openable windows. The heat gain on the lower levels is not assessed because those spaces are not 'occupied'.

A number of different mitigation scenarios are measured but it is not clear which scenario would be adopted if at all. What is clear is that a retrofit programme will be required to achieve acceptable comfort conditions. However it is the BRUKL results which need to be taken into account at planning stage.

4.10 Biodiversity potentially compromised:

4.10.1 Biodiversity

The Highgate School SPD states:

5.91 The Council will expect that as proposals are brought forward, the following will be considered and addressed as part of the assessment of landscape impact:

- conserve and enhance the historic landscape and heritage of the School;
- continue to support and develop an educationally rich, vibrant landscape;
- conserve the landscape structure of mature trees and openness;
- improve the value of Nature Conservation across the School Estate;
- develop a sustainable and productive landscape within the School Estate;
- adopt sustainable urban drainage principals; and
- appoint a Landscape Champion on the Governing Body and/or senior leadership team.

5.92 The School's open spaces, together with the parade ground, make an important contribution to the natural heritage of Highgate and works to improve the function and character of these areas will be supported.

5.93 The Council will support proposals that do not detrimentally impact on nature conservation and biodiversity and do not adversely detract from the overall function, amenity, character and appearance of the School's open space. Any development adjacent to the School's areas of open space will be required to protect and enhance the value and visual character of the open land. Additionally, the Council will support development that protects and enhances sites of biodiversity and nature conservation.

5.97 As set out at Figure 4, the boundary of the Highgate Bowl allocation runs along the southern boundary of the Dyne House site. Development proposals that do not negatively impact on the biodiversity and visual character of the Bowl will be supported.

5.98 The area known as the Parade Ground to the rear of Dyne House is currently an area of hard standing and is used as informal play space (it is the only area on the Senior School Site where a ball may be informally 'kicked about'), for general 'sitting out' during study periods and at breaks, and occasionally for gatherings of the whole School, for example for remembrance services. It is underutilised and is not visually appealing.

5.99 Whilst this area falls outside the Highgate Bowl allocation, but within an area of 'Proposed Significant Open Land' as defined within SA42 of the Site Allocations DPD (see Figure 4), the Council will seek enhancements to the visual appearance of this space, the removal of the hard standing, the greening of the space or other landscape features as an integral part of any redevelopment proposals submitted in respect to the Dyne House building to support the Significant Open Land designation. The Council will seek opportunities to visually link this area to the adjoining Highgate Bowl. The green dotted line shown on Figure 18 to Highgate Neighbourhood Plan Policy KS3 (Highgate Bowl) will set the rear limit for any redevelopment proposals associated with Dyne House.

There is remarkably little mention of biodiversity amongst the copious numbers of documents submitted with this application. These are the only references to biodiversity:

DAS 7 on page 38 para 7.4 states: *"Roof includes green planting to aid biodiversity and green appearance of Highgate Bowl."*

DAS 9 at 8.19 states: *"Biodiversity on Parade Ground. The existing Parade Ground will be renovated with additional planting, trees and seating to greatly improve the amenity space for pupils and aid the biodiversity of the area".*

This last statement is plainly misinformed. LDA Design's dwg. no.HS-DH3-LDA-22-00-DR-L-100 clearly shows that the vast majority of the Parade Ground is covered with road surfaces for vehicle and fire engine access, paved surfaces, external structures, climbing frames, table tennis, study area, a large paved area outside the buildings and the basement plant room extends unacceptably into the Significant Open Land area, as its roof forms part of the hard surfaces within the SOL. Scant care is taken to give enhanced biodiversity a chance on the Parade Ground. (Are Sixth Form pupils going to play on climbing frames or are younger pupils play in this area?)

4.10.2 Synthetic turf Synthetic turf is fast becoming recognised as a danger to wildlife and humans including human fertility. Please refer to Highgate Conservation Area Advisory Committee's objections to HGY/2023/0316: Far Field and HGY/2023/0313: Junior Field for further comments.

4.10.3 Green roofs

DAS 9 on page 65 lists *"Biodiverse green roofs"* followed by a generic photo captioned *"Biodiverse Green Roof"* and in DAS 7 page 47 it states: *"Key features of the new landscape include:*

- *Green roofs to assist pollination*

DAS 7 on page 47 states: *"Roof planting and a 'greened' Parade Ground with new synthetic turf, trees, shrubs and border planting that enhance the aesthetic and ecological value of the Highgate Bowl."* The actual proposed and eventual extent of green roofs is uncertain from the drawings. Also a retrofit to provide further M&E plant is expected to be installed.

The paucity of meaningful content on green roofs in the documents suggests that these green roofs are a nod to 'greening' and passing ecology tests.

Highgate School acknowledges that the green roof on the Junior School has been challenging and expensive to maintain. The cost of gardening and watering at roof level will not only be far greater than enriching biodiversity at ground level, provide less educational value but also cause overlooking for neighbours.

The documents claim that the roofs enhance the views into Highgate Bowl. The roofs would not be seen from within Highgate Bowl. Neighbours though may see rather decrepit green roofs from their upper windows. Maintenance of green roofs must be suitably conditioned in perpetuity.

4.10.4 Trees

Response to consultation in DAS Pt 5:

"Tree RPA's (Root Protection Areas) have been identified and the building footprint modified to avoid these. Investigatory 'air spade' trenches have confirmed areas of overlap are clear of critical root structures."

and DAS Pt 7 on page 38 para 7.4 states:

"Building moved clear of the tree root protection zone."

HCAAC is extremely concerned about care of the trees to be retained on the site and also trees on neighbours' land.

We note that on Arbtech's drawing A/HS-DH3/2332 Re. F that a total of nine trees are scheduled to be removed: T1 - T3 and T8 - T13.

We note the protective fencing on that drawing does not protect the roots of three trees in Group 1; nine trees in Group 2 G2n - G2u and G2a -G2m are also not protected by the fencing. These are very important trees which provide screening for neighbours.

Neighbours' trees T 14 and unnumbered tree to the west of T6 (possibly T7) both show that Arbtech expect that those trees' roots will have been limited by foundations to existing garden or retaining walls. The depth of those foundations and tree root activity on the Dyne House site need to be established before a Decision is made on this Application.

There is a tree to the west of T5 which is unnumbered.

The longevity of trees within the G2 group between the swimming pool and the boundary wall can reasonably be expected to be affected by the formation of the proposed basement levels so full details are required. The survival of these trees is crucial for the character of the Highgate Bowl and the Conservation Area and for neighbours' amenity.

In summary, the drawings are far from convincing.

10. Biodiversity potentially compromised: Biodiversity, synthetic turf, green roofs, trees

4.11 External Lighting

From MEP Report by Aecom:

6.4.12 External Lighting

The external lighting design will be designed to complement the architecture and provide a safe and secure ambiance. The design will follow good practice guidance documents for lighting characteristics and qualitative aspects such as lighting levels, uniformity of light, glare, and colour temperature. The following guides are relevant for our design.

- BS 5489-1:2020 – Lighting of Roads and Public Amenity Areas
- BS EN 12464-2 (2014) – Lighting of Outdoor Workplaces
- CIBSE Lighting Guide 6 – The Outdoor Environment
- SLL Institute of Lighting Engineers (ILE) Guidance Notes for the Reduction of Obtrusive Light.

"The lighting shall be planned and designed carefully so that the adverse impact of lighting on the environment will be avoided. The external lighting will be designed to ensure that:

- *all night-time lighting is concentrated in the appropriate areas*
- *upward lighting is minimised*
- *light pollution is minimised*
- *energy consumption is minimised*
- *External lighting will be required under the building overhang adjacent the back entrance. It is envisioned a base level of safe illumination will be provided by recessed downlights. The lighting control will be controlled by daylight photocell and/or astronomic digital timeclock."*

The domed lightwell at the front of Dyne House, the base of which would be level with the surrounding paving has the potential to adversely affect the settings of the many listed buildings adjacent to and opposite the site; and on the Highgate Conservation Area.

The Ecological Report by Arbtech highlights the need to control lighting along the boundaries to avoid disorientating bats.

The site at the rear is covered by SPDs for both the Dyne House site and the Highgate Bowl. Notwithstanding our view that this application fails to meet those policy guidelines in many

respects as a result of the very adverse impact on views from Highgate Bowl, any external lighting should respect this special setting and neighbours' amenity.

Full details of the proposed external lighting must be provided prior to a Decision being made.

A few warm words with no details is not acceptable.

4.12 Impact on Significant Open Land

We set out in Appendix 3 the extensive requirements to ensure Highgate School's proposals meet planning obligations as set out in the Highgate School SPD.

HCAAC considers this application fails to achieve compliance with the Highgate School SPD which the School drafted and agreed with Haringey Planning Department. These images clearly show to what extent the proposed development at the rear of Dyne House abut and visually impinge on the openness of the surrounding Significant Open Land.

- 8.0 | Project Proposals 8.22 | Artists Impression of Proposed Building from Dyne House Parade Ground
- Anstey Horne dwg ROL7552_05_006

They also show how unacceptably urbanised the Parade Ground section of Significant Open Land would be. As with all the other applications for the School to achieve its ambitions to more than double the size of its Estate, this Application must be refused because it fails to respect the much-loved Highgate Bowl for which the community has been a very careful caretaker with the support of the council's policies.

For this reason alone this application should be refused.

4.13 Needs, quanta and planning balance not provided

We note:

*SPD 4.68: Notwithstanding that this SPD has been developed taking into account supporting documents provided by the school, including an Education Needs and Accommodation Needs assessment, it is considered that the need for the specific facilities proposed is an important consideration in the planning balance. **Therefore when strategic proposals in the SPD come forward the development quanta proposed should be justified within planning applications to help in weighing up the planning balance against potential impacts on designations and amenity affecting each site.***

We further note that the Dyne House Planning Statement Para. 7.5 states:

*7.5 It is noted within the SPD that the Council supports **the efficient and optimum use of** Allocated Site SA41 through the upgrading of buildings and the provision of new educational and childcare facilities. Indeed, the SPD notes that the creation of additional education floorspace will be supported subject to the application of other policies within the development plan and noting other material considerations.*

However this is what the SPD actually states:

*"5.44 The Council supports the efficient and optimum use of Allocated Site SA41 through the upgrading of buildings and the provision of new educational and childcare facilities. The creation of additional Class D1 (Non-residential institution) floorspace will be supported subject to the application of other policies within the statutory Development Plan **whilst having regard to other material considerations.**"*

The 'other material considerations' are, of course, various levels of planning policy including the above-mentioned sub-section 1 of Section B of Policy S3 (Education and childcare facilities) in the London Plan (2021) which 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 Dyne House (or any of the other application sites) is in an area of need.

For this reason alone this application should be refused.

Conclusion

HCAAC considers this application is not supported by policy, that the proposal is neither efficient nor optimum given the level of harm and must be refused for all the reasons set out above.