

## **Consultation Response: 31<sup>st</sup> March 2026**

### **Southwood Lane Residents Association**

**HGY/2023/0328: Redevelopment of Dyne House**

**HGY/2023/0317: Refurbishment and extension of existing Science Block**

**HGY/2023/0390 Listed Building Consent for extension of existing Science Block**

The Southwood Lane Residents Association (SLRA) comprises 43 residents living along or in close proximity to Southwood Lane. Many of the properties owned and occupied by SLRA members are Grade II listed. Membership includes the immediate neighbours to both the Dyne House redevelopment site and the Science Block/Island site, who would be the most directly affected by both the construction and operational phases of the proposed developments, should consent be granted.

It is very disappointing that there are so few changes to the two proposed schemes compared to the original schemes submitted by the school in 2023, despite the community workshops facilitated by the King's Foundation in which the Southwood Lane Residents Association actively participated. Only minor material amendments have been made and these revisions do not address the substantive concerns previously raised by the SLRA in its consultation response of May 2023.

Accordingly, the following points set out in SLRA's original objection continue to apply and should be considered:

- Excessive Scale, Massing, Height and Bulk of the Proposed Development;
- Absence of Reasonable Justification for the Proposed Development;
- Basement Development Unacceptable in this Location;
- Unacceptable Construction Impacts;
- Unacceptable Heritage Impacts
- Sustainability and failure to achieve Carbon Neutral Development
- Impacts on Neighbours' Amenity
- Overlooking and Adverse Impact on the Highgate Bowl
- Additional Impacts from Community Uses.

#### **A. Dyne House Basement**

In 2023, SLRA appointed Alan Baxter Ltd as its independent structural and basement engineering expert, and Geotechnical Consulting Group LLP (GCG) as its independent hydrology and groundwater consultant, to review and advise on the School's Basement Impact Assessment (BIA) and Campbell Reith's independent audit. Alan Baxter were also instructed to review and comment on the Construction Management Plan (CMP)

Since our original objection was submitted, the applicant has issued further revisions of the Basement Impact Assessment (BIA) (Revisions 02 and 03) and a further Campbell Reith audit

has been submitted. In response, Alan Baxter and GCG have prepared updated technical reviews of the revised documents.

These updated expert reports have been submitted separately to the Council, are attached for ease of reference and are summarised below.

### **The site investigations that inform the BIA are inadequate**

The proposed rear basement is large (c. 60m x 10m), deep (1 to 3 storeys) and located on a steeply sloping site where “ground conditions vary” – as stated in the applicant’s BIA. However, only one 24-metre-deep borehole has been undertaken within the footprint of the basement\*, with groundwater monitoring limited to March–May rather than a full annual cycle.

For a basement of this size and complexity, expert advice indicates that at least six boreholes would normally be required, with groundwater monitoring in multiple locations.

This limited data underpins the entire BIA. Without sufficient and representative site investigation, it is not possible to reliably characterise ground conditions or groundwater behaviour, and therefore not possible to robustly predict ground movement, assess slope stability, or evaluate impacts on neighbouring properties.

The application therefore lacks the evidence necessary to demonstrate that the development can be carried out safely. It fails to comply with Policy DH7 of the Highgate Neighbourhood Plan and Policy DM18 of the Haringey Local Plan, both of which require proper assessment of structural stability and local geological conditions.

The applicant has had over 10 years, and further opportunity following community engagement, to undertake additional and more comprehensive site investigations to supplement the existing data, but has not done so. In these circumstances, the Council cannot reasonably conclude that the development would be safe or policy compliant.

\*9 boreholes were done in total, 3 at the front of Dyne House, 5 in the Parade ground (only one of which was relevant to the basement) and 1 on the site of the basement itself

This is contrary to:

- **Highgate Neighbourhood Plan Policy DH7:**

Any assessment on the impact of a basement development should demonstrate that:

“There will be no adverse effect from subterranean development on the structural stability of adjacent properties and associated potential damage;”

“There will be no possibility of irreparable damage to the local water regime both in terms of ground water diversion and surface water flooding;”

- **Haringey Local Plan Policy DM18:**

Basements will only be permitted where it can be demonstrated that they:

“Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions;”

“Does not increase flood risk to the property and nearby properties from any source”

- **NPPF Paragraph 196 a & c:**

“Planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability”

“adequate site investigation information, prepared by a competent person, is available to inform these assessments.”

**The technical analysis is inappropriate for the site conditions and significantly underestimates ground movement and resulting damage**

While additional borehole data would improve the understanding of the site, the principal concern is that the technical analysis relies on inappropriate methodologies and assumptions that are not suitable for the site conditions. This includes the selection of soil parameters, interpretation of ground conditions and other key inputs. As a result, the predicted ground movements cannot be regarded as reliable.

The BIA relies on CIRIA C760 and WALLAP-type methods to assess ground movement and retaining wall behaviour. These approaches are based on basements constructed in relatively level London Clay and are not suitable for a site with significant changes in ground level.

The Dyne House site is steeply sloping. However, the assessment does not account for the effects of slope, including unbalanced earth pressures between the higher and lower parts of the site, or overall lateral movement of the excavation. As a result, it does not properly represent how the ground will behave in reality.

This leads to a fundamental underestimation of ground movement, particularly on the upslope side, and therefore an underestimation of the potential damage to neighbouring properties. The BIA concludes that impacts will fall within Burland Scale 1, but this conclusion is not supported by a robust or appropriate assessment and cannot be relied upon.

Burland Scale 1 damage is a critical policy threshold under the Highgate Neighbourhood Plan. Where the methodology is inappropriate, the resulting conclusion is unreliable. Furthermore, Campbell Reith’s conclusion that policy is satisfied is inconsistent with its own identification of Burland Category 2 damage to the Grade II Big School building.

***In simple terms, the model used to predict damage is not suitable for this type of site, so its conclusions cannot be trusted***

This is further compounded by the inconsistency between the structural system assumed in the assessment and that set out in the Construction Management Plan, as set out below.

The inappropriate technical analysis is contrary to:

- **Highgate School SPD:**

“6.55. ensure that regard is had to Highgate Neighbourhood Plan Policy DH7: Basements”

- **Highgate Neighbourhood Plan Policy DH7: Basements**

Basements will only be permitted where it can be demonstrated that:

“There will be no adverse effect from subterranean development on the structural stability of adjacent properties and associated potential damage;”

“Under no circumstances should construction be allowed to proceed where there is evidence that damage to neighbouring properties would exceed Burland Scale 1.”

- **NPPF Paragraph 178:**

“Development should be safe for its lifetime without increasing risk elsewhere.”

### **There is a serious inconsistency between the BIA and the Construction Management Plan (CMP)**

The CMP states that the basement will be constructed using sheet piled walls supported by temporary ground anchors. In the ground conditions present on this site, ground anchors do not provide a stiff propping system and there is a significant risk of anchor movement or slip, which could result in substantial ground movement, particularly on the upslope side.

In contrast, the BIA assumes a completely different structural system — a secant piled wall with a stiff internal propping arrangement — and uses this as the basis for its ground movement assessment. These systems have materially different stiffness characteristics and would result in significantly different ground movements.

The assessment therefore does not reflect the method of construction proposed. In addition, the ground movement analysis takes no account of the site’s level changes, further undermining its reliability.

This lack of consistency is a fundamental flaw. The Council must assess a single, clearly defined and technically coherent scheme. It cannot reasonably conclude that the development would be safe where the assessment is based on one construction methodology but the scheme is intended to be built using another.

### **Reliance on Planning Conditions is Inappropriate**

It is not appropriate to rely on planning conditions to address fundamental deficiencies in the site investigation, basement design and supporting assessment. The current application lacks the necessary ground investigation, structural design development, and coherent construction methodology required to properly assess ground movement, groundwater behaviour and associated risks. These are not minor or technical matters, but matters that go to the heart of whether the development is safe and acceptable in planning terms.

In this case, the absence of adequate site investigation, together with an inconsistent and unreliable technical assessment and lack of a coherent basement design, means that the Council does not have sufficient information to properly assess the application. The National Planning Policy Framework is clear that planning conditions should not be used to make an otherwise unacceptable development acceptable, and that pre-commencement conditions

should only be imposed where there is a clear and justified need. In this case, the absence of adequate borehole data and a properly developed basement design means that the Council does not have sufficient information to determine the application. These matters must be resolved at application stage, not deferred. This is particularly important where the development gives rise to potential risks to structural stability, groundwater behaviour and neighbouring heritage assets

Our expert Alan Baxter has direct experience with a basement project in another borough where planning permission was granted based on a BIA (audited by Cambell Reith) predicting only minor cosmetic damage (Burland Category 1). The same CIRIA guidance was used.

Once construction began, the assumptions in the assessment proved to be incorrect and neighbour's damage escalated to Burland Category 4 and is continuing to worsen. The Party Wall process did not protect neighbouring owners as the excavations were outside the zone of the Party Wall Award. This illustrates that reliance on incomplete or inaccurate assessments, coupled with deferred design resolution, can lead to serious and irreversible harm.

Given the scale, depth and complexity of the proposed basement, its location on a steeply sloping site, and its proximity to neighbouring Grade II listed buildings, it is essential that a fully developed structural design, construction sequence and robust ground movement analysis are provided at application stage. Deferring these matters to condition would place unacceptable risk on neighbouring properties and would prevent proper scrutiny at the decision-making stage.

This is contrary to:

- **Highgate Neighbourhood Plan Policy DH7: Basements**

"This policy seeks to ensure that full consideration is given to the potential impacts of basement developments at application stage."

- **NPPF Paragraph 57:**

"Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification"

### **Inconsistency with Established Practice and Evidential Standards**

Furthermore, it is notable that the Council has previously granted planning permission for significantly smaller and less complex single storey householder basement developments within Highgate where substantially more comprehensive site investigation data was provided. For example, 41 Sheldon (HGY/2024/0806) with three boreholes, 7 Grange Rd (HGY/2015/2610) with 2 boreholes and 14 View Road (HGY/2006/1357) with 4 bore holes - to name but a few.

By contrast, the Dyne House proposal - which involves a far larger, deeper and more complex basement on a steeply sloping site - relies on only a single, outdated borehole for just 2 months. This represents a materially lower standard of site investigation than has been accepted as necessary in much smaller and less complex basement developments in Highgate.

This inconsistency demonstrates that:

- the current application does not meet the reasonable evidential standard required to assess basement impacts in Highgate; and
- the applicant has failed to provide sufficient information to enable the Council to properly discharge its duties under planning policy.

Accordingly, the Council cannot reasonably reach a sound planning judgment that the development would be safe or policy compliant. To do so, in light of the higher evidential standards applied to smaller basement schemes in the same area, would represent an inconsistent approach to decision-making.

### **Errors in the CMP**

The CMP contains inaccuracies in relation to the proposed construction traffic routes to and from the site. In particular, Southwood Avenue is identified as part of the route network, despite the fact that the junction with Archway Road is not suitable for HGV movements due to its restricted width and turning constraints.

This issue was acknowledged by the applicant during the community workshops, where it was accepted that the inclusion of this route was an error. However, the CMP has not been updated to correct this, and continues to rely on an inaccurate routing strategy.

As a result, the CMP does not provide a reliable or realistic assessment of construction traffic impacts. This undermines confidence in the document as a whole and raises concerns that the effects of construction activity on the local highway network and residential amenity have not been properly assessed.

The CMP must therefore be corrected and reissued to clearly identify appropriate and deliverable HGV and general construction vehicle routes before the application can be properly determined.

## **B. The Science Block**

### **Overlooking from the Proposed External Walkway into 16 Southwood Lane**

The proposed external walkway would result in direct and repeated overlooking into 16 Southwood Lane, leading to a significant and unacceptable loss of privacy.

Given the intensity of use by large numbers of pupils throughout the day, the overlooking would be frequent, sustained, and intrusive. The elevated and continuous nature of this circulation route would create a persistent sense of being overlooked, materially harming the reasonable enjoyment of the residents of 16 Southwood Lane.

The proposal therefore fails to safeguard residential amenity and is contrary to:

- **Highgate School SPD**

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

“6.12 & 6.18 ensure that any adverse effects on the amenity of the surrounding area are minimised”

“6.56 seek to preserve or improve the amenity of adjoining residential neighbours where this is possible”

- **Highgate Neighbourhood Plan Policy DH4 – Side Extensions**

Side extensions “should not harm the amenity of adjacent properties”

- **Haringey Local Plan Policy DM1 – Delivering High Quality Design**

“Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours.”

“Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development”

### **Garner Quad extension: Damage to neighbour amenity**

The proposed four-storey rear extension represents a substantial increase in height and massing in close proximity to the adjacent Grade II listed almshouses. Despite its relatively narrow footprint, its scale would result in significant harm to the almshouse at the south end:

- Overshadowing and loss of daylight
- Increased sense of enclosure

While mitigation measures such as window screening have been proposed to deal with the overlooking, these would introduce further adverse impacts, including additional reductions in natural light. This indicates that the scheme’s impacts cannot be adequately resolved through design amendments.

The proposal therefore conflicts with the:

- **Highgate School SPD**

As above

- **Highgate Neighbourhood Plan Policy DH4 – Side Extensions**

As above

- **Haringey Local Plan Policy DM1 - Delivering High Quality Design**

As above

### **Science Quad Extension: Harm to the Streetscape and Character of the Highgate Conservation Area**

The proposed four-storey side extension, by reason of its scale, design and siting, introduces a highly unsympathetic, incongruous and visually intrusive form of development to this fine 20th Century neo-classical building. Furthermore, it disrupts the symmetry and architectural

coherence of the existing Science Block and results in the partial obscuring of important architectural detailing which contributes to its character and significance.

The extension occupies a prominent and highly visible position along Southwood Lane, due to the open nature of the quad and the set-back arrangement of the existing building. As a result, the development would be clearly perceptible in wider views and would appear as a dominant and discordant addition within the streetscape.

The proposal fails to respond positively to the established scale, proportions and architectural composition of the host building. Instead, it introduces a competing and visually intrusive element which erodes the legibility of the original building and disrupts the strong symmetry that defines its design.

Accordingly, the proposal would cause harm to the character and appearance of the streetscape and would fail to preserve or enhance the Highgate Conservation Area.

This is contrary to:

- **Highgate Neighbourhood Plan Policy DH2 - Development Proposals in Highgate's Conservation Areas**

"Development proposals, including alterations or extensions to existing buildings, should preserve or enhance the character or appearance of Highgate's conservation areas"

- **Highgate Neighbourhood Plan Policy DH4 - Side Extensions**

Side Extensions "should be sensitive to and respect the character of the streetscape" and not "disrupt the integrity of the individual architectural composition"

"They should ... complement (its) character in terms of design, proportion, materials and detail"

- **Haringey Local Plan Policy DM9 – Management of the Historic Environment**

"Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive"

### **Science Quad Extensions: Harm to the Setting and Significance of Listed Buildings**

The site lies within the curtilage and setting of a number of Grade II listed buildings, including the Big School and Chapel, and is closely related to other listed structures forming the Science Quad, including the Old School and Library. The site also abuts the Grade II listed almshouses, and on the opposite side of Southwood Lane there are further Grade II listed residential buildings. As such, the site forms part of a highly sensitive and historically cohesive group of heritage assets in the heart of Highgate Village.

The proposed extensions fail to respond appropriately to this context. By reason of their scale, siting and design, they introduce prominent and unsympathetic additions which neither reflect the architectural quality nor the detailing of the existing buildings. In particular, the proposed elevations lack the refinement, proportion and coherence that characterise the surrounding historic fabric.

As a result, the extensions would appear as discordant and intrusive elements within the group, causing harm to the setting and significance of the surrounding listed buildings. This harm conflicts with the statutory duty to preserve the setting of listed buildings.

The proposal conflicts with:

- **Highgate School SPD**

“2.5. that development should preserve the setting of the statutorily and locally listed buildings on the site and neighbouring the school, having regard to their significance;”

- **Highgate Neighbourhood Plan Policy DH2 - Development Proposals in Highgate's Conservation Areas**

“Development proposals, including alterations or extensions to existing buildings, should preserve or enhance the character or appearance of Highgate's conservation areas, and respect the setting of its listed buildings and other heritage assets.”

- **Haringey Local Plan Policy DM9 – Management of the Historic Environment**

“The Council will have regard to: The priority given to sustaining and enhancing the significance of a heritage asset and its setting”

- **Listed Buildings and Conservation Areas Act 1990 - 66(1)**

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting...”

## **Conclusion**

For the reasons set out above, the SLRA objects to both applications. The key issues can be summarised as follows:

### **Dyne House Basement – Fundamental Deficiencies**

- **Insufficient site investigation**  
Only one outdated borehole for a large, deep basement on a steeply sloping site
- **Inadequate understanding of ground and groundwater conditions**  
No reliable basis to assess slope stability, groundwater behaviour or impacts on neighbouring properties
- **Unreliable technical analysis**  
Inappropriate methodologies used and key site conditions (including slope) not properly accounted for
- **Unreliable modelling inputs (including soil parameters and groundwater assumptions)**  
The assessment relies on unclear or unsupported input data and modelling assumptions, undermining the reliability of the predicted impacts.
- **Incorrect and inconsistent assumptions**  
Ground movement assessment based on a different structural system from that proposed for construction

- **Underestimation of risk and damage**  
Burland Scale 1 conclusion is not supported by a robust assessment
- **Fundamental lack of information**  
The Council cannot reasonably conclude that the development would be safe or policy compliant
- **Cannot be resolved by condition**  
These are fundamental issues that must be addressed at application stage

#### **Science Block – Clear Harm**

- **Unacceptable overlooking and loss of privacy**  
Direct and sustained overlooking into neighbouring property
- **Harm to heritage assets and Conservation Area**  
Unsympathetic extensions harming the setting of listed buildings and local character
- **Unacceptable impact on neighbour amenity**  
Loss of light, outlook and increased sense of enclosure

#### **Overall Conclusion**

- The applications fail to comply with the SPD, the Neighbourhood Plan, the Local Plan and national policy.
- They would result in unacceptable harm and unquantified risk

The Council cannot reasonably conclude that the development would be safe or compliant with policy. Accordingly, the SLRA respectfully requests that planning permission is refused.

## **Appendix 1: Planning Policy Non-Compliance**

### **1. Highgate School SPD**

- 2.5 that development should preserve the setting of the statutorily and locally listed buildings on the site and neighbouring the school, having regard to their significance
- 5.32 The Council will support development that ensures a high standard of privacy and amenity for the development's users and neighbours
- 6.12 and 6.18 ensure that any adverse effects on the amenity of the surrounding area are minimised
- 6.55. ensure that regard is had to Highgate Neighbourhood Plan Policy DH7: Basements
- 6.56 seek to preserve or improve the amenity of adjoining residential neighbours where this is possible

### **2. Highgate Neighbourhood Plan**

- **DH2 - Development Proposals in Highgate's Conservation Areas**
  - Development proposals, including alterations or extensions to existing buildings, should preserve or enhance the character or appearance of Highgate's conservation areas, and respect the setting of its listed buildings and other heritage assets
- **DH4 – Side Extensions**

- should be sensitive to and respect the character of the streetscape... or otherwise disrupt the integrity of the individual architectural composition or group where these contribute to the character of the local area
- “They should ... complement (its) character in terms of design, proportion, materials and detail
- They should not harm the amenity of adjacent properties

- **DH7 – Basements**

Any assessment on the impact of a basement development should demonstrate that:

- There will be no adverse effect from subterranean development on the structural stability of adjacent properties and associated potential damage;
- There will be no possibility of irreparable damage to the local water regime both in terms of ground water diversion and surface water flooding;
- This policy seeks to ensure that full consideration is given to the potential impacts of basement developments at application stage

### 3. Haringey Local Plan

- **DM1 – Delivery of High Quality Design**

- Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours
- Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development

- **DM9 - Management of the Historic Environment**

- The Council will have regard to: The priority given to sustaining and enhancing the significance of a heritage asset and its setting
- Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive
- They should ... complement (its) character in terms of design, proportion, materials and detail

- **DM18 – Water and Flood Risk**

Basements will only be permitted where it can be demonstrated that they:

- Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions
- Does not increase flood risk to the property and nearby properties from any source

### 4. National Planning Policy Framework (NPPF)

- **Paragraph 178:**

Development should be safe for its lifetime without increasing risk elsewhere

**Paragraph 196 a and c:**

- Planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability
- adequate site investigation information, prepared by a competent person, is available to inform these assessments

### 5. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990

- In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting...