

Highgate School

Haringey LPA references: HGY/2023/0313, HGY/2023/0315, HGY/2023/0338

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Three full planning applications for the redevelopment of the Bishopswood Road Campus of the Highgate School including:

- Redevelopment of Mallinson Sport Centre: 1) Partial demolition of existing structure, squash and fives buildings; 2) Refurbishment and extension of the remaining facilities, comprising new part single basement, new double height sports hall and new entrances, new teaching classrooms, offices, gym and exercise studios, circulation and ancillary accommodation; 3) New basement level outdoor covered fives courts; 4) External sunken oval sports pitch; and 5) Associated landscaping and improved provision for emergency services and servicing (LPA ref. HGY/2023/0338)
- Redevelopment of Richards Music Centre: Demolition of existing structure and development of a replacement building of two and a half storeys plus basement, and associated landscaping with improved provision for emergency services, servicing, and disabled parking (LPA ref. HGY/2023/0315)
- Temporary decant on the Junior Field: Installation of a single storey modular classroom facility, on a temporary basis, for a period of up to ten years; associated means of enclosure, footpaths, and landscaping' complete reinstatement of the synthetic surface upon cessation of use (LPA ref. HGY/2023/0313)

The applicant

The applicant is **Highgate School**, and the architect is **Ed Toovey Architects, Hopkins Architects Ltd and Modular Building Consultants**.

Strategic issues summary

Land use principles: The sites are within land designated as Metropolitan Open Land (MOL) and the proposals are inappropriate development. However, given the minor projection of the Mallinson Sport Centre and Richards Music Centre into MOL and the temporary nature of the decant building, with well-considered design approaches, GLA officers are satisfied that there would be very special circumstances to outweigh the harm to MOL. The Council should nevertheless ensure that the various local benefits proposed would be appropriately secured as part of any planning permission.

Urban design and heritage: The height, massing and layout have been carefully considered in response to MOL and school functional requirements, and the design is acceptable in strategic planning terms. GLA officers consider that a very low level of harm would be caused to the Highgate Conservation Area, but that public benefits would outweigh that harm. The Council should ensure that these are appropriately secured accordingly. A fire safety statement for the temporary decant building must be submitted to and appropriately secured by the Council.

Other matters on **transport, sustainable development** and **environmental issues** are broadly acceptable in strategic planning terms, simply requiring items to be secured by the Council.

Recommendation

That Haringey Council be advised that subject to the consideration within this report the application complies with the London Plan for the reasons set out in paragraph 71. The Mayor does not need to be consulted again.

Context

1. On 26 May 2023, the Mayor of London received documents from Haringey Council notifying him of the abovementioned 3 planning applications of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The applications are referable under the following category of the Schedule to the Order 2008:
 - **Category 3D:** *(a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building*
3. The applications have also been referred on the basis that Haringey Council considers them to collectively form part of more substantial proposed development on the same land or adjoining land, pursuant to paragraph 2 of the Schedule to the Order 2008.
4. Once Haringey Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision as to whether to direct refusal; or, allow the Council to determine it itself. In this case, GLA officers are recommending that the Council need not refer the applications back to the Mayor.
5. The Mayor of London's statement on these cases will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

6. The application sites are situated within the Bishopswood Road Campus of the Highgate School. The Junior Field is surrounded by school buildings and facilities to the north (Mallinson Sports Centre), west (Mills Centre, Junior School) and south (Richards Music Centre), St Michael's CofE Primary school playing fields to the east behind a line of mature trees and the rear gardens of residential properties to the south-east.
7. Much of the Highgate School site is designed as Metropolitan Open Land. The sites are also within the Highgate Conservation Area but do not contain or exist near to any listed buildings. The site is subject of the Highgate School SPD and the site allocation SA41 in the Haringey Local Plan which supports the redevelopment of the site in response to the needs of the school. The SPD

outlines the requirements for the redevelopment of Mallinson Sport Centre, Richards Music Centre, and the temporary decant scheme on the Junior Field.

8. The nearest section of the Transport for London Road Network (TLRN) is the A1, Archway Road, approximately 750 metres north of the site. The nearest section of the Strategic Road Network (SRN) is the Great North Road, approximately 1 kilometre north of the site.
9. The nearest bus routes to the site are those located on Hampstead Lane, Highgate Highstreet and North Road serving routes; 210, 603, 143, 214 and 271. Highgate Underground Station served by the Northern Line is located approximately 700 metres from the Bishopswood Road Campus buildings. The site has a Public Transport Accessibility Level (PTAL) of 2 on a scale from 0 to 6b where 0 is the lowest and 6b is the highest.

Details of this proposal

10. Three full planning applications for the redevelopment of the Bishopswood Road Campus of the Highgate School including:
 - Redevelopment of Mallinson Sport Centre: 1) Partial demolition of existing structure, squash and fives buildings; 2) Refurbishment and extension of the remaining facilities, comprising new part single basement, new double height sports hall and new entrances, new teaching classrooms, offices, gym and exercise studios, circulation and ancillary accommodation; 3) New basement level outdoor covered fives courts; 4) External sunken oval sports pitch; and 5) Associated landscaping and improved provision for emergency services and servicing (LPA ref. HGY/2023/0338).
 - Redevelopment of Richards Music Centre: Demolition of existing structure and development of a replacement building of two and a half storeys plus basement, and associated landscaping with improved provision for emergency services, servicing, and disabled parking (LPA ref. HGY/2023/0338).
 - Temporary decant on the Junior Field: Installation of a single storey modular classroom facility, on a temporary basis, for a period of up to ten years; associated means of enclosure, footpaths, and landscaping' complete reinstatement of the synthetic surface upon cessation of use (LPA ref. HGY/2023/0313).

Case history

11. On 23 May 2019, pre-application advice GLA/5076/01 was issued for the above proposals.
12. An additional application for improvements to the Farfield Playing Fields (GLA ref. 0355 / LPA ref. HGY/2023/0316) was referred to the GLA. GLA officers advised the LPA the application raises no strategic issues and is content for the LPA to determine the case itself.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Strategic Policies DPD (2017), Development Management Policies DPD (2017), Site Allocations DPD (2017), the Highgate Neighbourhood Plan (2017), the Highgate School SPD (2021), and the London Plan (2021).
14. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
 - Green Belt / MOL - London Plan;
 - Playing fields - London Plan;
 - Open land - London Plan; All London Green Grid SPG;
 - Education facilities - London Plan; Social Infrastructure SPG;
 - Sports facilities - London Plan; Social Infrastructure SPG;
 - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG;
 - Fire Safety – London Plan; Fire Safety draft LPG;
 - Heritage - London Plan;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
 - Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
 - Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive draft LPG; Air quality neutral draft LPG;

- Ambient noise - London Plan; the Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Leisure - London Plan;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor draft LPG

Land use principles

Development on Metropolitan Open Land

16. The sites lie within land designated as MOL. Policy G3 of the London Plan states that MOL is afforded the same status and level of protection as Green Belt. The construction of new buildings on MOL is inappropriate unless it meets the following exceptions in paragraph 149 of the NPPF:

- a) Buildings for agriculture and forestry;
- b) Provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purpose of including land within it;
- c) The extension or alteration of a building, provided that it does not result in disproportionate additions over and above the size of the original building;
- d) The replacement of a building, provided the new building is the same use and not materially larger than the one it replaces;
- e) Limiting infilling in villages;
- f) Limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and,
- g) Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would: not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Exceptions test

17. The applicant has considered the exceptions outlined in paragraph 149 of the NPPF and consider that the redevelopment of Mallinson Sport Centre and the

redevelopment of Richards Music Centre meet exception (b) above and consider that the temporary decant does not meet any exception and has put forward a case for Very Special Circumstances (VSC). GLA officers have considered the information submitted and consider each of the proposals to represent inappropriate development on MOL that would need to demonstrate VSC. For completeness, the applicant has presented a case for VSC for each of the proposals.

Very special circumstances

18. Paragraph 147 of the NPPF states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. Paragraph 148 of the NPPF requires substantial weight is given to any harm to the Green Belt. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
19. The applicant has outlined the following VSC for Mallinson Sport Centre:
 - a) The School’s Accommodation Need Statement which outlined the requirements for the additional facilities proposed at the Mallinson Sports Centre.
 - b) Paragraph 95 of the NPPF states that LPAs should “give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on application”;
 - c) That there is no site preferable in planning terms upon which the required accommodation could be provided;
 - d) That the facilities will improve the accessibility to high quality sports infrastructure for Highgate’s partner schools and the general public, when it is not in use;
 - e) The redevelopment will improve a building which is currently identified as a detractor from the Highgate Conservation Area within the Conservation Area Appraisal.
20. GLA officers consider that items a) and c) above constitute VSC. Items b), d) and e) are not in themselves VSC but are material considerations that weigh in favour of the development.
21. The applicant has outlined the following VSC for Richards Music Centre:
 - a) The School’s Accommodation Need Statement which outlined the requirements for the additional facilities proposed at the RMC;
 - b) Paragraph 95 of the NPPF states that LPAs should “give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on application”;

- c) The scope of the development has been revised to relocate elements of the brief from other areas of the estate in response to neighbourly matters;
 - d) The axis of the development is responding to local site constraints as required by the Highgate School SPD;
 - e) The quality of the area to be developed is poor, being tarmacked and used for the parking of vehicles – thus offering no contribution to MOL purposes;
 - f) The proposed development will enhance the overall recreational and sporting function of the wider MOL designation;
 - g) There is no more preferable site in planning terms upon which the required accommodation could be provided;
 - h) The proposed development at RMC has enabled a reduction in the scale of the proposals at Dyne House, while enabling the School to meet modern academic demands
22. GLA officers consider that items a) and g) above constitute VSC. Items b), c), d), e), f) and h) are not in themselves VSC but are material considerations that weigh in favour of the development.
23. The applicant has outlined the following VSC for the temporary decant on the Junior Field:
- a) There is a strong policy justification for proposals which enhance education provision (principle of development);
 - b) The development facilitates a ten-year estate programme which would deliver highly sustainable development enhancing the education provision across the estate – the need is established within a supplementary planning document which is a material consideration of weight;
 - c) The development is temporary and upon cessation of the need for the decant solution, the site would be fully restored;
 - d) There is no alternative site which is sequentially preferable to the Junior Field location;
 - e) The use of this location will significantly reduce disruption, avoiding the need to install and remove temporary facilities with each project;
 - f) The site offers the opportunity to reuse the existing foundation / pad of the existing MUGA and the MUGA surface is approaching end of life requiring replacement in any event, resulting in a lesser extent of development and a lower carbon impact arising from the temporary construction;
 - g) That the school has a track record of delivering high quality temporary facilities and site restoration;

- h) That in all other respects, the proposed development is compliant with the development plan when read as a whole.
24. GLA officers consider that items b), c) and d) above constitute VSC. Items a), e), f), g) and h) are not in themselves VSC, but are material considerations that weigh in favour of the development.
25. Due consideration is given to the overall increase in floor area and design intention for the new buildings at Mallinson Sport Centre and Richards Music Centre. The buildings are mostly located within land not designated MOL with encroachments on MOL of less than the 1,000 sq.m. as outlined in Category 3D of the Mayor of London Order 2008. Further, most of the additional floor space of the Mallinson Sport Centre takes a subterranean form. The temporary decant is a single storey modular structure to replace an existing playing field which will be restored at the end of the development programme. It is therefore considered that the impact to MOL openness with respect to the new buildings at Mallinson Sport Centre and Richards Music Centre is limited, and the impact to MOL openness of the decant modular structure is temporary.
26. It is further noted that the proposed permanent buildings are located on the existing previously developed areas school site and raise no strategic urban design issues. Based on the benefits set out above, GLA officers are satisfied that there would be VSC to outweigh the harm to MOL. Nevertheless, the Council is strongly encouraged to seek to secure community use / access provisions to enhance the local benefits package in line with Policy S3 of the London Plan.

Urban design

27. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
28. The optimisation of the site for educational and sport purposes with the construction of new buildings is supported in principle. The height, massing and layout raises no strategic concerns given the low-scale nature of the new buildings on the existing school site. The LPA will consider the relationship of the new buildings and their additional massing on the amenity of adjacent residents accordingly. The landscaping and public realm improvements are welcomed and should be secured by the LPA.

Fire safety

29. Policy D12 of the London Plan states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Further to the above, Policy D5 of the

London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.

30. The applicant has submitted a fire safety statement for Richards Music Centre and Mallinson Sports Centre, which appears to meet the requirements of Policy D12. These statements should be secured by condition. A fire safety statement for the temporary decant building must be prepared and meet the requirements of Policy D12 and be appropriately secured.

Inclusive access

31. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The application must ensure that development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and, provides independent access without additional undue effort, separation or special treatment. The Council is encouraged to secure compliance with Policy D5.

Heritage

32. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset's conservation should be avoided or minimised (Para 195). Para 199 and caselaw indicate that great weight should be given to a heritage asset's conservation (Para 199). Harm should be clearly and convincingly justified and, if less than substantial, weighed against any public benefits (Paras 200, 201 and 202).
33. Policy HC1 of the London Plan requires development proposals to conserve significance by being sympathetic to the assets' significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Policy D3 of the London Plan through the design-led approach requires development proposals to respond to the existing character of a place and respect, enhance and utilise the heritage assets that contribute towards local character.
34. The site is within the Highgate Conservation Area but does not contain or is near to any listed buildings.

Richards Sport Centre

35. The existing building was constructed in the 1930s as a cricket pavilion. This red brick building is not indicated as being a positive contributor to the conservation area. The applicant states that it is a neutral contributor to the conservation area and not a non-designated heritage asset. GLA officers

nevertheless consider that the building makes a small contribution to significance as a partially surviving typical example of a 1930s cricket pavilion, the character of which is still discernible, is of some age and contributes to the typical and historical school sports field setting seen in views from Bishopswood Road.

36. GLA officers consider that the proposals will cause a very low level of less than substantial harm to the conservation area through the demolition of the existing building and the construction of a slightly taller and less characterful building, which has a slightly urbanising effect.
37. It is suggested that some mitigation might be provided by 1) the retention of the historical plaque at the west end of the building and its insertion into the brickwork of the new building; this is an attractive feature which has previously been successfully moved and 2) the reuse of the clock and weathervane, perhaps using the existing tower as a small standalone structure.

Mallinson Sports Centre

38. The buildings consist of a swimming pool from 1970, a sports hall from 1980, a squash courts building from circa 1980 and a set of fives courts from “the early 20th century”. The only element which may have significance is the fives courts. The proposals include the demolition of the squash and fives courts and alterations and extensions to the swimming pool and sports hall. Further information on the significance of the fives courts should be provided to the LPA. The other proposed demolitions are beneficial to the conservation area. The proposed development is of a more positive design and appearance, although there will be a slight urbanising effect on the conservation area caused by the increased footprint.

Temporary decant on the Junior Field

39. The proposed 2,740 square metres of temporary classroom accommodation would cause harm to the Highgate Conservation Area. The proposals will see the open and green character of the space replaced by utilitarian buildings for a period of 10 years.
40. The LPA should secure a condition requiring removal of the temporary buildings and bringing the land back to its pre-existing condition at the end of the consented period and reduce the consented period. Every effort should be made to improve the appearance of the buildings and to screen them. It is suggested that the buildings could be painted, clad or greened to reduce their visual impact.

Conclusion

41. As some harm is caused (albeit at a very low level), the proposal does not comply with Policy HC1 and the harm must be given considerable importance and weight. The NPPF states that any harm to heritage assets must be clearly and convincingly outweighed by the public benefits of the proposal. GLA officers consider that the proposal, which would provide new sport and

educational facilities, would provide public benefits that could outweigh the very low level of harm caused in this case. The LPA will need to assess whether there is appropriate mitigation measures and ensure that the benefits have been robustly secured.

Cycle parking

Mallinson Sports Centre

42. The applicant has proposed 42 covered and 8 uncovered cycle parking spaces at the location of the Mallinson Sports Centre, totalling 50 spaces. This is not in line with London Plan policy, a total of 58 short-stay spaces should be provided for the 5,760 sq.m. of sporting facilities.

Richards Music Centre

43. The applicant has proposed 6 cycle spaces to serve the Richards Music Centre. This is not in line with London Plan policy, a total of 18 short-stay spaces should be provided for the 1,784 sq.m. music centre.

Temporary decant on the Junior Field

44. No cycle parking is proposed for the temporary facilities. As mentioned during pre-application, given the considerable length of time the temporary facilities will be in use for, cycle parking should be provided in line with London Plan standards.
45. More information should be provided regarding the number of staff and students that will be using the temporary facilities in order to calculate the necessary number of cycle parking spaces required.

Car parking

46. The development will be car-free, except for the two disabled bays for the Richards Music Centre, which is welcomed. Given informal parking often occurs on site, it is requested that a Parking Design and Management Plan is submitted. This should set out how all proposed blue badge parking is designed and managed, and how restrictions are enforced. All car parking and vehicular access routes to car parking spaces must be designed to avoid creating a car-dominant environment. All car parking should be parallel to the footpath, and all surfaces should be permeable to ensure sustainable drainage. The LPA should also consider conditions to restrict parking to designated areas only to prevent other areas being repurposed as such.

Healthy Streets

47. Internal access arrangements and pedestrian footways should be designed in accordance with the Healthy Streets Approach to ensure a safe and welcoming environment for all students in line with Policy T2 of the London Plan.

Trip generation

48. The respective TAs states that as there will be no increase to staff or student numbers across the campus, there is unlikely to be a significant increase in traffic levels. The TA has not considered the usual requirement for community usage of both the Mallinson Sports Centre and Richards Music Centre given the charitable status of Highgate School. Further information should be provided regarding this matter.

Construction logistics

49. A full Construction Logistics Plan (CLP) should be secured by condition in line with Policy T7 of the London Plan and discharged in consultation with TfL prior to commencement. The full CLP should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction.

Travel Plan

50. Funding for the implementation and monitoring of a full Travel Plan should be secured in the S106 agreement in line with Policies T1 and T4 of the London Plan.

Deliveries and servicing

51. A full delivery and servicing plan should be provided and secured by condition in line with Policy T7. Deliveries and servicing should be arranged to occur outside of peak times.

Sustainable development

Energy strategy

52. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

53. An energy statement has been submitted with the application. The energy statement does not yet comply with Policies SI2, SI3 and SI4 of the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
 - Be Lean – clarification of modelling assumptions;

- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed on the refurbished element;
- Be Green – demonstration that renewable energy has been maximised, including details of the proposed air source heat pumps;
- Be Seen – confirmation of planning submission, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details for the heating strategy.

Carbon savings

54. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft S106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

55. In accordance with Policy SI2 of the London Plan the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
56. The applicant should submit a whole life-cycle carbon assessment for the Council to consider. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular economy

57. Policy D3 of the London Plan requires development proposals to integrate circular economy principles as part of the design process. Policy SI7 of the London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
58. The applicant is required to submit a Circular Economy Statement in accordance with the GLA guidance for the Council to consider. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

Digital connectivity

59. A condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with Policy SI6 of the London Plan.

Environmental issues

Biodiversity

60. Policy G6 of the London Plan states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.
61. It is recommended the applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6. If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the LPA.
62. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by condition.

Green infrastructure and urban greening

63. The applicant is not considered to integrate urban greening as a fundamental element of the proposed development. The applicant should present a well-considered approach to integrating green infrastructure and urban greening across the masterplan, in accordance with Policy G1 of the London Plan.
64. The applicant should also demonstrate that the scheme enhances connectivity with wider green infrastructure network through green links and species selection. As the site boundaries front onto the public highway, the applicant should consider the opportunity to contribute to the greening of the public realm. The applicant should consider opportunities for tree planting, gardens, green roofs and play areas to counteract the loss of open space.
65. In accordance with Policy G5 of the London Plan, the applicant should calculate and provide the Urban Greening Factor (UGF) score for the proposed development and meet the minimum specified target of 0.3. A drawing showing the surface cover types and accompanying UGF calculation should be submitted. Further information can be found [here](#).

Flood risk, sustainable drainage, and water efficiency

66. GLA officers have reviewed the submitted information in regards to flood risk, sustainable drainage, and water efficiency and the proposed development generally complies with Policies SI.12, SI.13 and SI.15 of the London Plan.

Air quality

67. The applicant has submitted air quality assessments for Mallinson Sports Centre and Richards Music Centre and consider the developments as air quality neutral. Although an air quality assessment was not prepared for the temporary decant building, GLA officers consider it to be air quality neutral. The LPA should secure air quality conditions.

Local planning authority's position

68. Haringey Council planning officers are currently assessing the applications. In due course the Council will formally consider the applications at a planning committee meeting.

Legal considerations

69. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, the Council need not refer the application back to the Mayor. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

70. There are no financial considerations at this stage.

Conclusion

71. London Plan policies on land use principles (Metropolitan Open Land), urban design, heritage, transport, sustainable development, and environmental issues are relevant to this application. Subject to the consideration within this report the Mayor does not need to be consulted again, as outlined below:

- **Land use principles:** The sites are within land designated as Metropolitan Open Land (MOL) and the proposals are inappropriate development. However, given the minor projection of the Mallinson Sport Centre and Richards Music Centre into MOL and the temporary nature of the decant building, with well-considered design approaches, GLA officers are satisfied that there would be very special circumstances to outweigh the harm to MOL. The Council should nevertheless ensure that the various local benefits proposed would be appropriately secured as part of any planning permission.

- **Urban design and heritage:** The height, massing and layout have been carefully considered in response to MOL and school functional requirements, and the design is acceptable in strategic planning terms. GLA officers consider that a very low level of harm would be caused to the Highgate Conservation Area, but that public benefits would outweigh that harm. The Council should ensure that these are appropriately secured accordingly. A fire safety statement for the temporary decant building must be provided and appropriately secured.
- **Transport:** Further information on car and cycle parking, Healthy Streets, trip generation, construction, deliveries and servicing and Travel Plans should be provided to the LPA.
- **Sustainable development:** Additional information on energy, whole life-cycle carbon and circular economy should be considered and secured by the LPA.
- **Environmental issues:** The applicant should consider opportunities for further biodiversity and urban greening to be secured by the LPA.

For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.