

Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Development) (England) Regulations 2012

Highgate School Supplementary Planning Document
Consultation Statement March 2021

Title of document

Highgate School Planning Document (SPD)

Subject matter

On 24 July 2017 Haringey Council adopted a Site Allocations development plan document which allocated Highgate School (allocation SA41) to establish the principle of the refurbishment / redevelopment of School buildings and the enhancement of facilities including community access. The Council has prepared a supplementary planning document (SPD) to support Site Allocation 41 outlining masterplan for the School to enhance or redevelop its buildings over the next 10 years.

Area covered

The SPD applies to the ward of Highgate.

Consultation

In accordance with the requirements of the Town and Country Planning (Local Development) (England) Regulations 2012, as amended, this statement sets out the details of the consultation undertaken on the Highgate School SPD and how the main issues raised have been addressed.

A draft version of the Highgate School SPD was the subject of public consultation for eight weeks between **26 October 2020 and 21 December 2020**. The consultation was originally due to end on 7 December 2020 but was extended by two weeks due to additional

challenges of responding to the consultation linked to the national Covid-19 Lockdown implemented in late 2020.

The draft SPD and November 2020 Consultation Statement were available for inspection on the Council's website: www.haringey.gov.uk/highgateschoolspd and at all Borough Libraries and the main Council Offices, River Park House, 225 High Road, Wood Green, N22 8HQ.

The Council invited comments on the draft SPD by email at: planning.policy@haringey.gov.uk and by post to: Planning Policy, Haringey Council, 6th Floor River park House, High Road, Wood Green, N22 8HQ

In accordance with the Council's Statement of Community Involvement the consultation comprised:

- Public notice in the Ham and High giving details of the draft document, a list of the addresses of local libraries where the document was available for public inspection and the addresses (postal and e- mail) to which representations were to be sent;
- Over 600 notifications about the draft document were sent by post and e-mail to statutory consultation bodies, other organisations, planning consultants/developers, local groups and individuals on the Local Plans consultation database on 26th October 2020;
- Documents were published on the Council's main website (planning pages) alongside notification on the Council's twitter account.

In addition to the above standard methods of engagement (as required by the Council's Statement of Community Involvement), two virtual engagement sessions were held on 25 November 2020 and 9 December 2020 and the presentation and summary of questions and answers published on the Council's websites afterwards.

Additionally

- a. Public notices were placed on lamp posts in the vicinity of the School
- b. Letters were delivered to properties in Highgate within the vicinity of the School's campus as outlined within the SPD

Main Issues Raised in the Consultation

The responses by issue and the Council's response to them are attached at **Appendix 1**. The following paragraphs summarise the main issues raised.

The role of the Supplementary Planning Document

Some of the responses expressed concerns regarding the implications of the document being adopted with respect to future planning applications.

The NPPF indicates that SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. The National Planning Practice Guidance (NPPG) indicates that a material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission). There is however a distinction between the question of whether something is a material consideration and the weight which it is to be given. Provided it has regard to all material considerations, it is for the Council (as Local Planning Authority) to decide what weight is to be given to the material considerations (such as the proposed SPD) in each case. Whilst the existing Local Plan Site Allocation does establish that the principle of development is acceptable, this and the SPD do not convey an 'automatic approval' of subsequent planning applications.

It should be noted that the SPD does not preclude the School coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Haringey Local Plan. The SPD would be a material consideration to the extent that it is relevant to the proposal. Similarly, works currently occurring on the site should not be seen as pre-empting the outcomes of the SPD, as provided these have the appropriate planning permissions (and other consents), they can occur notwithstanding the SPD process (a number of representations expressed concern in this regard).

Academic Needs

A significant number of respondents queried the basis for the proposed improvements and development, and stated that the whilst the documents are quite specific on the amount of development that will be needed to meet needs, there are no details of pupil numbers taking the relevant subjects to quantify the need. This was also expressed with concern as to whether these needs are aspirations as opposed to actual needs, and as such whether the SPD took the right balance between what the School may aspire to or 'need' and the importance of enhancing the Conservation Area, local amenity, protection of MOL and transport issues.

The principle of the enhancement of the School's facilities is established in adopted Site Allocation 41, and the provision of new or enhanced educational facilities is supported in the Local Plan, the London Plan and the National Planning Policy Framework. The SPD has been developed taking into account supporting documents provided by the School, including an Education Needs and Accommodation Needs assessment. Importantly, the estate development programme proposed is not one of growth; rather it is predicated on providing high quality facilities to the existing pupil body which is expected to remain within the School's currently licenced capacity of 1,970. The need for the estate development programme is built upon a requirement for the modernization of the School's facilities and is designed to replace life expired buildings and provide flexibility in response to modern requirements of teaching today. In many cases, the programme also reflects and responds to changes in legislation and the need to provide a sustainable and resilient estate, responding to the climate emergency. It is acknowledged that the need for the specific facilities proposed is an important consideration in the planning balance, therefore the SPD has been revised to clarify that when strategic proposals in the SPD come forward the development quanta proposed should be justified within planning applications to help in the weighing of up the planning balance against potential impacts on designations and amenity affecting each site.

Simultaneous Applications

A majority of respondents requested that the SPD commit the School to bring forward its applications simultaneously so the community can see the holistic treatment of the different proposals.

Given the cumulative impacts of the proposed developments, the SPD has been revised to include clearer guidance that applications for strategic proposals in the SPD should be submitted simultaneously, so that the developments can be seen in the round, and that cumulative impacts across the various development sites can be assessed. The Council cannot preclude the School submitting planning applications at any time but the SPD is capable of being a material consideration in the determination of planning applications.

Pupil Numbers

A majority of respondents expressed concern that the proposals in the SPD were to accommodate an increase in pupil numbers, with potentially significant negative impacts upon Highgate Village, and would be inconsistent with the SPD's statement that the new facilities are for existing pupils to bring them up to modern standards. Respondents wanted to see a much more specific commitment to not increase pupil numbers.

The Council has confirmed with the School's administration that the School does not intend to expand its pupil numbers above those already allowed for in its Department for Education license, and so the SPD text has been strengthened to clarify this, and to re-iterate that the proposals within it are to meet the modern academic needs of the School's current population, and are not proposed to help accommodate any expansion of the pupil body.

Further Engagement

Many respondents expressed a desire to continue to be engaged throughout the School's redevelopment proposals and requested that the SPD confirms that the School will conduct pre-application consultations with full details for each site and over a reasonable length of time. Additional proposals were put forward including that the School could establish a version of a Community Review group (used by a number of local authorities on key sites) including representatives from key community organisations to create a regular and constructive forum for dialogue.

The existing Local Plan requires that all new development confidently addresses feedback from local consultation (Policy DM1). The Council's Statement of Community Involvement recommends applicants of major schemes to undertake early community involvement before submitting an application to the Council. It is the responsibility of the applicant to conduct pre-application community involvement. For major planning applications the Council requires that, at the point of submission, the applicant identifies the consultation undertaken and its results, together with how this has been incorporated into the submitted planning application. It should be noted that the School has already undertaken some pre-application consultation on a number of its emerging proposals and has made further commitments around future engagement and text has been added to the SPD to highlight this commitment. The SPD has been amended to clarify that any future planning applications will be subject to mandatory consultation with local residents in line with planning legislation.

Indicative Building Heights and Massing

There was widespread support for including more detail on indicative heights, design, massing, and building footprint. Respondents stated that this is required, in part, because the need for new buildings should be balanced by appropriate heights and design considerations (including massing, bulk, footprint) which preserve the significance of the heritage assets and residential amenity. This linked back to the respondents' concerns about academic need, and that the School's "requirements will dictate the future heights, massing and footprints of the buildings in future applications.

The SPD does contain guidance as to how the impacts of any building including its height and massing should be considered and balanced against needs. It is considered that the best place to consider and assess detailed matters such as heights and designs is at the planning application stage; the SPD could not realistically prescribe these given the numerous impacts that will need to be considered on each site, and over the course of the 10 year SPD period. Instead it is considered appropriate that the SPD clearly highlights these potential impacts and site constraints and gives guidance as to how any development proposal should deal with these and result in a good design that protects amenity, heritage and character. Text within each of the relevant sites in the SPD subject to redevelopment has been strengthened to make clear how the constraints, including neighbouring impacts, should be considered in relation to a submitted application's massing, height and design, to ensure that planning policy requirements can be addressed, the development's overall design is appropriate and that the academic needs demonstrated for the development do not override or take precedence over the need for good design and overall impacts of the development.

Dyne House

A large proportion of responses focused on the proposals for Dyne House, with concern expressed with regards to neighbouring privacy and amenity, views through Highgate Bowl and Southwood Lane, the importance of the Parade Ground and a desire for it not to be developed upon, and the potential for excavations. Support was given for any redevelopment to be set well back from the back edge of the footpath replicating a development line set by buildings demolished to make way for the present building alignment and footprint. There were also objections to the demolition of the School Gymnasium building on this site.

The text regarding Dyne house has been strengthened to confirm that impacts on neighbouring properties, including excavation or any potential basement works must have regard to their amenity and relevant Local Plan policies. Additionally, it is clarified that the Parade Ground is not included within the scope of any redevelopment, and that this area will remain as is. The SPD has also been amended to further stress the importance that any building's final design should also respect and minimise impacts on important local views and character across the Highgate Bowl. It is noted that the current building line respects the historic street pattern therefore guidance has been added that the building line of any redeveloped buildings fronting Southwood Lane should be carefully considered.

Highgate Bowl and Views

There was concern that the SPD does not adequately consider views, and requests that important local views, including in and out of the Highgate Bowl, need greater protection in the SPD. It was also noted that all current views looking toward the Highgate Bowl from

Southwood Lane and residents homes and gardens are protected and so should not be obstructed by any replacement buildings.

As noted above, these concerns particularly relate to the redevelopment of Dyne House given its proximity to Highgate Bowl and these views. The SPD has therefore been amended to further stress the importance that any building's final design should also respect and minimise impacts on important local views and character across the Highgate Bowl.

Far Field

Where respondents mentioned the Far Field it was to express concern with regards to potential issues with artificial lighting, and impacts on visual amenity and biodiversity.

The SPD has been amended in this regard to state that any proposals for lighting would be subject to assessment of impacts and should take into account the site's context and particularly biodiversity. It is considered that the current text within the SPD gives sufficient guidance and control to ensure that works in this area will not harm overall amenity, and should help improve biodiversity. The existing playing pitches are a mono-culture, heavily mowed and so in themselves offer no real biodiversity value. Landscaping works associated with playing pitch improvements offer the opportunity to improve biodiversity value on this site. Text has been inserted to clarify that the works are to meet modern academic needs and to enable the pitches to be used throughout the year and to improve biodiversity value.

Richards Music Centre

There was support received for the building's retention as it was stated it is a positive contributor to the character and appearance of the Conservation Area.

Whilst the building is a positive contributor to the area, it is not a designated heritage asset. As such, the SPD sets out that redevelopment may be acceptable where the needs for a modern accessible facility are demonstrated, and that any new building would also make a positive contribution to the area. The SPD text has been amended to clearly clarify this. It is not considered appropriate within existing policy to protect buildings from any redevelopment where the benefits of redevelopment can clearly be demonstrated.

Mallinson Sports Centre

There was some concern regarding the impact of redevelopment on the open aspect across fields on either side. Sport England commented on the need for replacement facilities unless surplus to requirements.

The SPD includes guidance to ensure it is clear that any replacement building should not impact any further than current buildings on the openness of the MOL and amenity, this however has been revisited to be made more explicit. The SPD also includes guidance that states that new facilities should enhance sporting facilities in line with Local Plan requirements. However additional text has been added to state that any application should clearly outline how the facilities in any new building replace those already in situ to ensure there is no unjustified loss of provision.

Island Site

There were suggestions that the SPD should be more specific with regards to this site, highlight that proposals to build on or above open space should be resisted, and that additional clauses should be added to include more detail on design and streetscape along Southwood Lane, heritage impacts, access and useability of the tunnel and amenity, sustainability and safety impacts.

The SPD references sustainability and access in general so that they cover all sites. The guidance has been strengthened to reference the amenity of neighbouring occupiers and to give further detail with regards to the heritage and design solutions that could be utilised.

Impact upon Highgate Village

Some respondents mentioned that redevelopment would not be a benefit to Highgate Village and the impacts could detract from it especially during construction.

The benefits of redevelopment will primarily be to the School and its students to enable modern, accessible and fit for purpose facilities. However it is considered that these improvements could benefit the area through improved design and quality, particularly in relation to Dyne House and the Mallinson Sports Centre, which are identified as negative contributors to the area. Construction impacts are covered below.

Sustainability

A significant number of comments requested the SPD go further on sustainability measures including requiring the estate to achieve zero carbon by 2030. There was also support for retrofitting of buildings to improve sustainability, not just achieving BREEAM standards on extensions or new build.

SPDs cannot introduce new policy requirements, they can only provide further guidance on adopted policies. Therefore Local Plan policies will continue to apply for any redevelopment and they must meet those minimum requirements as currently stated in the SPD, and in recognition that these standards may well be increased during the lifetime of this SPD. However, the SPD can incentivise best practice and include aspirations for achieving better sustainability outcomes. Therefore the SPD has been amended to further elaborate in the sustainability section that the School should seek to maximise and go above current standards where feasible, and where works include extensions to buildings rather than wholly new buildings that opportunities to incorporate further sustainability measures in the rest of the building should be explored to help the estate move towards zero carbon.

Transport

Many of the representations that were received expressed concern that any redevelopment, including construction works would worsen traffic congestion and safety rather than improve it, and that there are already issues with parking. Suggestions for improvements including

more use of buses and promoting walking and cycling were offered. It was requested that impacts must be demonstrated cumulatively, not individually by scheme. Additionally it was noted that:

- TfL should be consulted on the Transport Assessment and any updates to the Travel Plan
- Travel by car should be decreased and active travel modes prioritised
- Active travel infrastructure, such as bike racks and lockers should be provided
- Future developments should look to decrease car parking. Existing car parking should not be an acceptable justification for retention of spaces

The SPD has been amended to include more detail on active travel and to reflect the above bullet points. It should be noted that the School is not seeking to undertake development that would lead to a significant impact in terms of traffic generation. The proposals are to accommodate the existing School pupil body. However, the SPD does contain guidance ensuring that walking and cycling are prioritised, and that the School continues to work to ensure parking is managed effectively. The SPD also provides guidance that the School's Travel Plan should be updated where new development would necessitate this such as where it could lead to a variation in travel patterns. Text has been amended to make clear the travel plan should be updated iteratively to take into account the cumulative impacts of each application. This should be possible to assess through the commitment to submit applications simultaneously.

Metropolitan Open Land (MOL)

The SPD identifies the potential to use the Junior Field which is MOL for a temporary decant facility, and for the sports hall which adjoins MOL to be redeveloped. Concern was expressed by many regarding the potential that MOL could be developed on.

Detailed consideration as to whether any temporary use on MOL is acceptable will occur when formal planning applications are made and this would be subject to a Section 106 planning obligations agreement. In response to these concerns, additional text is included in the amended SPD to clarify the considerations that will be taken into account for the principle of any temporary use.

There was also concern that there could be detrimental impacts upon MOL from development in the vicinity. The SPD contains guidance for proposals in the vicinity of MOL setting out that its openness and function must be considered and protected. In this regard, existing Local Plan and London Plan policies protecting MOL will be applied, and these do not need to be replicated in the SPD but are signposted.

The Greater London Authority (GLA) advised that there should be more emphasis on the strategic policy protection of MOL across the SPD as a whole. This has now been explicitly listed among the objectives of the SPD (pages 3-4). Where development would be inappropriate, this must be robustly supported by very special circumstances that clearly outweigh the harm to the openness of the MOL, and any other harm. Any site-specific proposals need to accord with MOL policy protection in their own right. This has been further highlighted, particularly on the Richards Music Centre site guidance for clarity.

Additionally updates have been made to reference the Publication London Plan 2020 requirements on protecting MOL in Policy G3.

Accessibility

There was general support for improvements that result in buildings made more accessible for all. This was welcomed, and these requirements remain.

Biodiversity

There was encouragement for proposals to contribute further to improving biodiversity. Notably Natural England included suggestions for improvements to biodiversity and to protect existing habitats.

Additional text has been inserted to further emphasise the importance of increasing biodiversity through redevelopment under the Natural Environment section, and this does signpost a policy requirement for a net gain in biodiversity across the estate as a whole.

Construction Impacts

There were many concerns expressed that the scale of the School's proposed development could lead to significant disruption in Highgate Village. It was therefore requested that the SPD must require staggered implementation of development schemes and require the inclusion of planning conditions which robustly protect Highgate from the combined impacts of several large-scale projects being delivered at the same time. Similarly there were concerns about the general impacts of construction including timings, noise, excavation. There was support for requiring Construction Management Plans.

The proposals in the SPD are intended to be delivered over 10 years, and so implementation will be staggered. This must be balanced with the desire for applications to be submitted simultaneously as far as is possible. However, guidance has been added to the SPD to reference relevant adopted Local Plan and London Plan policies that must be followed to mitigate against construction impacts, and in particularly referencing the Mayor of London's Supplementary Planning Guidance (SPG) 'The control of dust and emissions during construction and demolition' (July 2014). Further, the SPD has been amended to advocate that Construction Management Plans should be submitted and where any other development is proposed simultaneously, that the cumulative impacts must be planned for to avoid undue disruption, noise, and emissions during their construction.

Community Access

Comments were received in relation to ensuring / securing public access to the proposed facilities (i.e. sporting / cultural). The SPD notes the existing external use of many of the facilities on the site and recognises that many of the new facilities will benefit existing users, as well as providing capacity to accommodate greater local School and community use. The extent of access to the new facilities will form part of the assessment of the detailed planning applications.

Statutory consultees

Statutory consultees were notified of the draft SPD in accordance with the relevant Regulations. Responses were received from the Highways Agency, Historic England, Natural England, Sport England, the Environment Agency, Greater London Authority and Transport for London. The key points raised by these consultees are included in the above summary.

Appendix 1 – Issues Raised and Council’s Response

The table below summarises the comments received during the consultation and sets out the Council’s response.

Respondents Comments by Issue	Council’s Response / amendments to draft document
Academic Need	
<p>Academic need for enhanced facilities has not been demonstrated or substantiated</p>	<p>The principle of the enhancement of the School’s facilities is established in adopted Site Allocation 41, and the provision of new or enhanced educational facilities is supported in the Local Plan, the London Plan and the National Planning Policy Framework. The SPD has been developed taking into account supporting documents provided by the School, including an Education Needs and Accommodation Needs assessment. Importantly, the estate development programme proposed is not one of growth; rather it is predicated on providing high quality facilities to the existing pupil body which is expected to remain within the School’s currently licenced capacity of 1,970. The need for the estate development programme is built upon a requirement for the modernization of the School’s facilities and is designed to replace life expired buildings and provide flexibility in response to modern requirements of teaching today. In many cases, the programme also reflects and responds to changes in legislation and the need to provide a sustainable and resilient estate, responding to the climate emergency.</p> <p>The SPD and the proposals within it are to ensure that going forward the facilities are of a modern standard, and crucially can be fully accessible for all. As noted in the SPD, some of the buildings such as Dyne House are towards the end of their useful lifespan, and so whilst the School is successful now, redevelopment to provide better academic facilities that enable inclusive access are supported by National Planning Policy and London Plan policy. It is therefore considered appropriate to enable improvements that meet academic need and achieve these benefits, as well as potentially wider community benefits.</p>

Respondents Comments by Issue	Council's Response / amendments to draft document
<p>Concern that without the need justified, the level of development could harm the character, heritage and amenity of the area and is not balanced against these issues and so does not outweigh the potential harm</p>	<p>It is acknowledged that the need for the specific facilities proposed is an important consideration in the planning balance. Change. The SPD has been revised to clarify that when strategic proposals in the SPD come forward the development quanta proposed should be justified within planning applications to assist in the weighing up of the planning balance against potential impacts on designations and amenity affecting each site. Furthermore, additional changes have been made to the site specific guidance sections of the SPD to clearly indicate and, where necessary, strengthen guidance on amenity, heritage and other impacts, as set out in the sections below.</p>
<p>Has the School considered using its existing property assets to meet the need, especially properties on Broadlands Road.</p>	<p>These have been considered and are outlined within the SPD under alternative options. These were discounted due to timetabling and distance, making them unfeasible. Specifically the increased distance from the Senior School for both pupils and teachers would have significant adverse impact to the timetable. The travel time would be incompatible with 35 minute individual music lessons but facilities in Dyne House could be retained. Change. The SPD has been amended to give further detail as to why these buildings are not viable to be used, with regards to facilities need, timetabling and pupil movement and time.</p>
<p>Simultaneous Applications</p>	
<p>The SPD should require applications to be submitted simultaneously in order to give an overall picture of development intentions and so they can be assessed holistically</p>	<p>The SPD does not preclude the School coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Haringey Local Plan. The SPD would be a material consideration to the extent that it is relevant to the proposal.</p> <p>Change. Given the cumulative impacts of the proposed developments, the SPD has been revised to include clearer guidance that the strategic proposals outlined in the SPD are submitted simultaneously, so that the developments can be seen in the round, and that cumulative impacts across the various development sites can be assessed.</p>
<p>SPD should require simultaneous applications but stipulate staggered implementation of these projects and each must have a robust Construction Management Plan that recognises and mitigates the amount of demolition and</p>	<p>The SPD has a ten year time frame, and as set out in the implementation section, these projects would not necessarily be delivered concurrently.</p> <p>Change. For clarity, the SPD has been amended to give more detail on the indicative timetable for development and to demonstrate that major works will not be taking place at the same time. The SPD also clarifies that Construction</p>

Respondents Comments by Issue	Council's Response / amendments to draft document
construction traffic that will be generated.	Management Plans that look at all works that may take place should be submitted with applications.
Could it be written into the SPD that a pre application stage of 6 weeks will be afforded to the community before full planning applications are submitted	The existing Local Plan requires that all new development confidently addresses feedback from local consultation (Policy DM1). The Council's Statement of Community Involvement recommends applicants of major schemes to undertake early community involvement before submitting an application to the Council. It is the responsibility of the applicant to conduct pre-application community involvement. For major planning applications the Council requires that, at the point of submission, the applicant identifies the consultation undertaken and its results, together with how this has been incorporated into the submitted planning application. The SPD has been amended to clarify that any planning application will be subject to mandatory consultation with local residents in line with planning legislation and also additional consultation as per the Council's Statement of Community Involvement. The School has committed to continue to engage with neighboring occupiers, and through already established fora such as the Highgate Neighbourhood Forum and the Highgate Conservation Area Advisory Committee. Change. Text has been added to the SPD to highlight this commitment.
Concern that if one application is refused, the School may try to justify the delivery of additional facilities in larger buildings on other sites	Once adopted, the SPD will set a positive framework for future development. In the event of a refusal, and future application would still have to accord with the Development Plan and any material considerations including this SPD.
Pupil Numbers	
The SPD should have a clear commitment that Pupil Numbers are not to exceed existing licensed capacity	The Council has confirmed with the School's administration that the School does not intend to expand its pupil numbers above those already allowed for in its Department for Education license. Change. The SPD text has been strengthened to clarify this, and to re-iterate that the proposals within it are to meet the modern academic needs of the School's current population and are not needed or proposed to accommodate any further expansion.
If permission is granted, a condition should be attached that limits the number of students on site to the existing licensed capacity	As set out above, the programme of strategic proposals in the SPD is not intended to support an increased pupil body. Consideration will however be given at application stage as to whether a condition of the type proposed could be appropriate.
If Highgate School's development for additional	As above, the SPD text has been strengthened to clarify that the works are to

Respondents Comments by Issue	Council's Response / amendments to draft document
<p>space is approved, the School may then in future turn to the DfE and seek an increase in pupil numbers on the basis that it then had additional capacity. The SPD needs to guard against this.</p>	<p>accommodate the existing School population, and to re-iterate that the proposals within it are to meet the modern academic needs of the School's current population, and are not needed or proposed to accommodate any further expansion.</p>
<p>Further Engagement</p>	
<p>The SPD should include a requirement to create a new standing consultative group consisting of representatives from local Schools and other key local organisations to ensure the effective implementation of a sustainable transport plan for Highgate Village and the Neighbourhood Plan</p>	<p>The existing Local Plan requires that all new development confidently addresses feedback from local consultation (Policy DM1). The Council's Statement of Community Involvement recommends applicants of major schemes to undertake early community involvement before submitting an application to the Council. It is the responsibility of the applicant to conduct pre-application community involvement. For major planning applications the Council requires that, at the point of submission, the applicant identifies the consultation undertaken and its results, together with how this has been incorporated into the submitted planning application. Any planning application will be subject to mandatory consultation with local residents in line with planning legislation and also additional consultation as per the Council's Statement of Community Involvement.</p> <p>The School has undertaken extensive public consultation to date and will display information relating to future planning applications within the School Museum. It will also continue to liaise with established forums such as the Highgate Neighbourhood Forum and the Highgate Conservation Area Advisory Committee (also see below response). Change. Text has been added to the SPD to highlight this commitment.</p>
<p>Request that the School could establish a version of a Community Review Panel (used by a number of local authorities) including representatives from key community organisations to create a regular and constructive forum for dialogue.</p>	<p>A number of existing forums operate in Highgate and are consulted by the School, particularly of relevance are the Highgate Neighbourhood Forum, Highgate Society and Highgate Conservation Area Advisory Committee. The Highgate Neighbourhood Forum is consulted on planning applications within this area and would be the appropriate body for ongoing dialogue.</p>
<p>The SPD should make specific provision requiring the School to engage in pre-application consultations with full details for each site and over a reasonable length of time.</p>	<p>Change. The SPD has been amended to clarify that any planning application will be subject to mandatory consultation with local residents in line with Planning Legislation and also additional consultation as per the Council's Statement of Community Involvement. The Council's Statement of Community Involvement recommends applicants of major schemes to undertake early community involvement before submitting an application to the Council.</p>

Respondents Comments by Issue	Council's Response / amendments to draft document
<p>Concern over the priorities of the Council in obtaining pre-application fees, and role in preparing this SPD in conjunction with the School</p>	<p>The Council is the local planning authority and has the role of preparing policy and guidance. Policy is adopted by Cabinet/Full Council. Policy and guidance should be informed by working with key stakeholders, including landowners, particularly where this is site specific, and this is encouraged in national guidance. Planning applications are determined by Planning Sub Committee which is separate from Cabinet. This is a very normal process and division of responsibilities for planning authorities across the country.</p>
<p>Indicative Building Heights and Massing</p>	
<p>Adopted Site Allocation SA41 indicates that an SPD will include details of building heights and massing. This is missing and should be included as the SPD is inconsistent with what the Development Plan expects it to do and fails to accord with it.</p> <p>Many of the sites are sensitive, and indicative heights and massing are needed to illustrate how they can be developed without negatively impacting the Conservation Area, Metropolitan Open Land, Views and Highgate Bowl. The SPD should consider in more detail issues regarding heights and design.</p>	<p>The SPD contains guidance as to how the impacts of any building including its height and massing should be considered. It is considered that the best place to assess detailed matters such as heights and designs is at the planning application stage; the SPD could not realistically prescribe these given the numerous impacts that will need to be considered on each site, and over the course of the 10 year SPD period. Instead it is considered appropriate that the SPD clearly highlights these potential impacts and site constraints and gives guidance as to how any development proposal should deal with these and result in a good design that protects amenity, heritage and character.</p> <p>Change. Text within each of the relevant sites in the SPD subject to redevelopment has been strengthened to make clear how the constraints including neighbouring impacts should be considered in relation to a submitted application's massing, height and design, to ensure that planning policy requirements can be addressed, the development's overall design is appropriate and that the academic needs demonstrated for the development do not override or take precedence over the need for good design and are balanced against overall impacts of the development.</p>
<p>Concern the identified need will effectively dictate the scale and height of the required building and make it far more difficult to resist harmful impacts arising from excessive heights, massing and scale</p> <p>Objection to the lack of detail on heights and massing, linked to the need for accommodation being the driver for any final design</p>	<p>It is acknowledged that the need for the specific facilities proposed is an important consideration in the planning balance. Change. The SPD has been revised to clarify that when strategic proposals in the SPD come forward the development quanta proposed should be justified within planning applications to assist in the weighing up of the planning balance against potential impacts on designations and amenity affecting each site. Furthermore, additional changes have been made to the site specific guidance sections of the SPD to clearly indicate and, where necessary, strengthen guidance on amenity, heritage and other impacts, as set out in the sections below.</p>

Respondents Comments by Issue	Council's Response / amendments to draft document
<p>The “need” for new buildings should be balanced by appropriate heights and design considerations (including massing, bulk, footprint) which preserve the significance of the heritage assets and residential amenity.</p> <p>The SPD has a high level of detail provided by the School in terms of the facilities and floor space required. This makes the SPD inherently unbalanced as the needs of the School will be enshrined in the SPD but building heights and design are not</p>	
Dyne House	
<p>The current Dyne House development sits in line with the historic building line of the previous building(s) which occupied the Dyne House Site. The current building line thus respects the historic pattern of development of the site and protects the views down Southwood Lane. The SPD should include guidance that any redevelopment should respect the historic alignment of the footpath and be set back as now for amenity, heritage and protection of views.</p>	<p>It is agreed that maintaining the current building line would help protect the historic character of the area, and so guidance on this has been inserted. Change. Text has been added to the SPD to clarify that the design should respect and minimise impacts on views along Southwood Lane and that the building line of any redeveloped building should be carefully considered to respect those views and the streetscene.</p>
<p>The SPD needs to clarify whether the informal assembly area is included in the draft needs, and if it is essential to safe use of the tunnel and if so justify this.</p>	<p>The School has clarified that there is no location within the Senior School campus for the entire School to gather.</p>
<p>The retention of the existing tree canopies to preserve amenity and character of Highgate Bowl should be added to the site guidance.</p>	<p>The SPD clarifies at 5.86 that existing trees of value should be retained and 5.89 also states that a key aim is to conserve the landscape structure of mature trees and openness. This is also referenced within the Dyne House site where the SPD clarifies that proposals should consider protected trees along the</p>

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	boundary of the Parade Ground and include within landscaping of the site. It is therefore considered the SPD provides guidance on this to ensure trees are properly protected and taken into account. Change. The SPD has however been amended to link the importance of trees on this site to their role in the amenity of Highgate Bowl.
Request that any redevelopment incorporate green roofs where possible and that all protected trees are retained	The SPD and Local Plan policies support these proposals generally. Change. Whilst the guidance for this site already mentions that green roofs should be considered, this has been amended to specifically reference the benefits of incorporating green roofs and the important role of trees on this site. As noted above, the protection and importance of trees is incorporated within the overall aims of the SPD.
The drama studio behind Dyne House should not be demolished – it could be repurposed and any demolition and rebuild would cause noise and disturbance to immediate neighbors	The current building is inaccessible for those with mobility issues and has a very limited audience due to its design and so is not considered essential for retention. The SPD sets out that amenities of adjoining residential properties be safeguarded in accordance with Policy DM 1 and, where possible, improved.
Whilst detail is lacking on heights in the SPD, it should therefore include text to state that any building on the Dyne House site should not exceed the roof heights of the existing buildings at Dyne House itself and not exceed the eaves line of any backland buildings	It is considered that the best place to consider and assess detailed matters such as heights and design is at the Planning Application stage; the SPD could not realistically prescribe these given the numerous impacts that will need to be considered on each site. Change. The SPD has been amended to further stress the importance that any buildings final design should also respect important local views and character across the Highgate Bowl and ensure that impacts on these are minimised.
The SPD should address the potential for underground excavation and management of spoils which should not result in HGV's using Kingsley place	Change. The text regarding Dyne house has been strengthened to confirm that impacts on neighbouring properties, including excavation or any potential basement works, must be considered in line with relevant Local Plan and Neighbourhood Plan policies. Future proposals must include a Construction Management Plan. (Also see construction impacts response re Neighbourhood Plan Policies on Basement impacts being required)
The SPD partly excludes the main part of the (former) CCF Parade Ground from the framework diagram (page 70).	Change. The diagram has been amended.
The SPD needs to clearly protect the parade ground as open land and in respect of its local open space designation	The School plans to maintain the open nature of the Parade Ground as an important amenity space within the Senior School Campus.

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<p>The SPD should seek to preserve the fabric of the gymnasium which is listed and consider possible conversion for academic uses. Any redevelopment should not be higher than as is given proximity to neighbouring houses and their windows.</p>	<p>The gymnasium is not a Listed Building. The current building is inaccessible for those with mobility issues and has a very limited audience due to its design and so is not considered essential for retention.</p>
<p>The supporting Bidwells Accommodation Analysis appears to exclude Dyne House from its appraisal of the School's existing accommodation and its options analysis. This needs rectifying and publishing</p>	<p>The School has confirmed that this is not an omission. The document, which is only a supporting document to the SPD, considers alternative sites for the Dyne House accommodation.</p>
<p>Concern that the heights of any built development in the land behind the current Dyne House, where the lower buildings and Gibbons Garden are currently located, should be sensitively controlled, and this is not specified currently. The heights of any built development in this backland area should respect the topography of the site, the openness of the Bowl and the heights of neighbouring buildings.</p>	<p>The Council agrees that this is a sensitive location for new development. The SPD sets out a full range of considerations which future proposals should have regard to.</p>
<p>Any redevelopment should be designed to be similar to the original Southwood Lane Georgian style</p>	<p>The SPD guidance states that 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. It is not considered appropriate to require one specific style however.</p>
<p>The parking spaces at the front should be retained or replaced so as to avoid undue pressure on on-street spaces</p>	<p>This issue will be considered at the point of an application being made.</p>
<p>Request that the SPD include provision that the area called Gibbons Garden remain open and not built upon due to concerns on privacy and views of neighbouring houses</p>	<p>It is intended that this area remains open.</p>
<p>The SPD envisages Dyne House being more self-</p>	<p>This is a requirement to ensure compliance with the Equalities Act (formerly</p>

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<p>contained and therefore with less tunnel traffic (6.48). But on the other hand, the School complains of current congestion and the desirability of new building at the Dyne House frontage to widen tunnel access. The SPD text is therefore in conflict</p>	<p>DDA).</p>
<p>Highgate Bowl and Views</p>	
<p>Important local views, including in and out of the Highgate Bowl need greater protection in the SPD.</p>	<p>As noted above, these concerns particularly relate to the redevelopment of Dyne House given its proximity to Highgate Bowl and these views. Change. The SPD has been amended to further stress the importance that any building's final design should also respect important local views and character across the Highgate Bowl, and ensure that impacts are minimised.</p>
<p>Private views into the Bowl from Southwood Lane and residential properties and gardens should be protected in the SPD</p>	<p>The SPD clarifies that on this site particular regard needs to be had towards the amenities of adjoining residential properties.</p>
<p>The SPD should include protection for views up and down Southwood Lane</p>	<p>The response above to the guidance on Dyne House states it is agreed that maintaining the current building line would help protect the historic character of the area, and so guidance on this has been inserted Change. Text has been added to the SPD to clarify that the design should respect and preserve the views along Southwood Lane and that the building line of any redeveloped building should be carefully considered to respect those views and the streetscene.</p>
<p>Stronger links to protections for the Highgate Bowl need to be incorporated into the SPD including links to polices in the Highgate Neighbourhood Plan such as KS3.3</p>	<p>Change. Links and text to these policies have been inserted for clarity</p>
<p>Far Field</p>	
<p>Concern about the possibility of artificial floodlighting being introduced which could impact amenity and Kenwood North Wood and important wildlife habitats</p>	<p>It is considered that the current text within the SPD gives sufficient guidance and control to ensure that works in this area will not harm overall amenity and should help improve biodiversity. The existing playing pitches are a mono-culture, heavily mowed and so in themselves offer no real biodiversity value. Landscaping works associated with playing pitch improvements offer the opportunity to improve biodiversity value on this site. Change. The SPD has been amended to state that any proposals for lighting would be subject to</p>

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	assessment of impacts and should take into account the site's context and particularly biodiversity. Text has been inserted to clarify that the works are to meet modern academic needs and to enable the pitches to be used throughout the year and to improve biodiversity value.
Concern that introducing artificial pitches may lead to a decline in biodiversity	The existing playing pitches are a mono-culture, heavily mowed and so in themselves offer no real biodiversity value. Landscaping works associated with playing pitch improvements offer the opportunity to improve biodiversity value on this site
Suggestion that there should be an increase in biodiversity and environmental quality secured on the site specified in the SPD	The existing playing pitches are a mono-culture, heavily mowed and so in themselves offer no real biodiversity value. Landscaping works associated with playing pitch improvements offer the opportunity to improve biodiversity value on this site, and this is stated within the SPD.
Any pitch improvements should be overseen by a sports agronomist, and should meet Sport England's Playing Field Policy and the NPPF, particularly paragraph 97. This should be noted in the SPD.	Change. The SPD has been amended to insert text to reference these policies, guidance and the benefit of a sports agronomist in developing proposals.
Sport England stated there should be a clear demonstration of local need (not just School need) for a proposed Artificial Grass Pitch/green artificial surface to meet the Sport England Playing Pitch policy	Noted. This need should be demonstrated at planning application stage.
Richards Music Centre	
Suggestions that the Music Centre can instead be sensitively remodeled, and that the roof should not be higher than currently, and windows not be added to the southern elevation to protect neighbouring amenity	Whilst the building is a positive contributor to the area, it is not listed. As such, the SPD sets out that redevelopment may be acceptable where the needs for a modern accessible facility are demonstrated, and that any new building would also make a positive contribution to the area. It is not considered appropriate within existing policy to protect non listed buildings from any redevelopment where the benefits of redevelopment can clearly be demonstrated. The Council requires further detailed heritage statements and impact assessments to be produced in support of specific development proposals, which are to be submitted at the detailed planning application stages and this is stated in the SPD. Change. The SPD text for this site has been amended to clearly clarify this.

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<p>The building contributes positively to the character of the area, and so any justification for redevelopment would therefore need to be based on a clear understanding of the public benefits set against the significance of the building in accordance with NPPF paragraph 196 (less than substantial harm). The SPD should set out this approach.</p>	<p>It is acknowledged that the current building is a positive contributor. Change. As per the answer above, the text has been strengthened, and references national policy as set out in the NPPF.</p>
<p>Question over whether the building is actually unfit for purpose, given the success the School has had in subjects being taught there</p>	<p>The existing building's layout and its form of construction severely compromise its use for any educational purpose. There are also problems with the building's drainage and foundations.</p>
<p>Mallinson Sports Centre</p>	
<p>Sport England recommends that the SPD indicates that any replacement facilities should, at least, provide the same facilities as those lost unless they are clearly identified as surplus.</p>	<p>The SPD includes guidance to ensure it is clear that any replacement building should not impact any further than current buildings on the openness of the MOL and amenity. Change. This has been revisited to be made more explicit. The SPD also includes guidance that states that new facilities should enhance sporting facilities in line with Local Plan requirements. Change. Additional text has been added to state that any application should clearly outline how the facilities in any new building replace those already in situ to ensure there is no unjustified loss of provision.</p>
<p>Concern regarding the impact of redevelopment on the open aspect across fields on either side</p>	<p>The SPD contains guidance that states that any redevelopment must preserve and enhance the character of the Highgate Conservation Area and respect and enhance the view across the Metropolitan Open Land. It is considered that this should ensure that any redevelopment must retain the open aspect.</p>
<p>Impact on Highgate Village Infrastructure</p>	
<p>The SPD should consider the impact of building works on Highgate Village, and the viability of businesses within it, as construction may deter shoppers</p>	<p>A Construction Management Plan will be required to be submitted with all applications, and deal with highways impacts to ensure additional traffic as a result of development can be managed acceptably.</p>
<p>Sustainability</p>	
<p>The SPD should go further on sustainability measures including requiring the estate to achieve zero carbon by 2030.</p>	<p>The Council expects all new developments within the School to be Zero Carbon in accordance with the London Plan and Haringey's Local Plan Policy SP4. An SPD cannot introduce policy requirements that would introduce new policy on</p>

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	standards to be achieved.
Support for retrofitting of buildings to improve sustainability, not just achieving BREEAM standards on extensions or new build and this should be included within the SPD guidance.	SPDs cannot introduce new policy requirements, they can only provide further guidance on adopted policies. Therefore Local Plan policies will continue to apply for any redevelopment and they must meet those minimum requirements as currently stated in the SPD, and in recognition that these standards may well be increased during the lifetime of this SPD. However, the SPD can incentivise best practice and include aspirations for achieving better sustainability outcomes. Change. The SPD has been amended to further elaborate in the sustainability section that the School should seek to maximise and go above current standards where feasible, and where works include extensions to buildings rather than wholly new buildings that opportunities to incorporate further sustainability measures in the rest of the building should be explored to help the estate move towards zero carbon.
Suggestions that the SPD include text to require applications for extensions to include a Decarbonisation Report for the whole building and the current version of the School's Sustainability Plan as should all other applications.	The School will submit information consistent with the Council's development plan requirements and that required by the Council's planning applications validation checklist.
Comment that the SPD should detail that pollution to be monitored as part of the School's Sustainability Plan; that Applications will demonstrate that car parking places will not increase; will provide details of bicycle storage, delivery vehicles and electric charging points.	SPDs cannot introduce new policy requirements, they can only provide further guidance on adopted policies. The School will be required to comply with the development plan requirements around pollution monitoring and car parking. Existing Local Plan and London Plan policies require details of cycling and charging points to be submitted with applications to meet the standards in the London Plan. Additionally the SPD acknowledges that the School is conscious that to improve cycle connectivity, suitable internal facilities (showering facilities, bike racks etc.) need to be appropriate and readily available. The Council will support proposals for improving the use of sustainable transport modes.
Respondents invited the School to work with existing local climate action groups to deliver on its ambitious sustainability targets including Zero Carbon by 2030.	This is a matter for the School and local groups, should they wish to work together, and cannot be a requirement in an SPD. The Council strongly encourages working towards zero carbon in line with its existing Local Plan and emerging Climate Change Action Plan
Transport	

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<p>Concern that any redevelopment, including construction works would worsen traffic congestion and safety rather than improve it, and that there are already issues with parking. It was requested that impacts must be demonstrated cumulatively, not individually by scheme and stated in the SPD.</p>	<p>It should be noted that the School is not seeking to undertake development that would lead to a significant impact in terms of traffic generation. The proposals are to accommodate the existing School pupil body. However, the SPD does contain guidance ensuring that walking and cycling are prioritised, and that the School continues to work to ensure parking is managed effectively. The SPD also requires the School's Travel Plan to be updated where new development would necessitate this such as where it could lead to a variation in travel patterns. Change. Text has been amended to make clear a travel plan should be submitted to take into account the cumulative impacts of each application, and be updated iteratively if necessary.</p>
<p>The SPD should highlight that the School should produce a transport assessment (TA) and an updated Travel Plan for the entirety of the estate to be submitted alongside future applications, which Transport for London should be consulted on.</p>	<p>The SPD states that the Council will require construction and implementation programmes of all development projects within the Transport Assessments in order for the Council's transport officers to assess traffic impacts during and after construction periods. Change. Text has been amended to make clear a Travel Plan should be submitted to take into account the cumulative impacts of each application, and be updated iteratively if necessary.</p>
<p>The SPD should commit to including improvements including more use of buses (including School buses) and promoting walking and cycling, or park and ride to reduce traffic and parking impacts in the area particularly around the number of children being driven to and from School and the parking impacts of this.</p>	<p>The SPD highlights that the School is looking at initiatives to reduce cars on the road through alternative approaches to encourage staff and parents or carers to use alternative modes of transport or, in cases where this is not genuinely feasible, as an alternative, to use a car for only part of the journey to School with walking/public transport being used for the last stage (e.g. 'Park and Stride').. These aspirations are linked to development requirements and so will be illustrated in Travel Plans submitted with planning applications.</p>
<p>The SPD should clarify that travel by car should be decreased and active travel modes prioritised.</p>	<p>The SPD promotes sustainable travel patterns, and also states that sites with existing car parking that come forward for development will need to justify the retention of those spaces having regard to the relevant Public Transport Accessibility Levels of each site, the policies of the statutory development plan and the NPPF and the operational requirements of the School. Local Plan policies that require car parking to be minimised will also apply to any proposal.</p>
<p>Active travel infrastructure, such as bike racks and lockers should be provided and detailed in the SPD requirements and meet London Plan policies on provision of cycle parking.</p>	<p>Existing Local Plan and London Plan policies require details of cycling parking to be submitted with applications to meet the standards in the London Plan. Additionally the SPD acknowledges that the School is conscious that to improve cycle connectivity, suitable internal facilities (showering facilities, bike racks etc.) need to be appropriate and readily available. The Council will support proposals for improving the use of sustainable transport modes.</p>

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Future developments should look to decrease car parking. Existing car parking should not be an acceptable justification for retention of spaces and this objective should be included in the SPD.	The SPD states that sites with existing car parking that come forward for development will need to justify the retention of those spaces having regard to the relevant Public Transport Accessibility Levels of each site, the policies of the statutory development plan and the NPPF and the operational requirements of the School. Local Plan policies that require car parking to be minimised will also apply to any proposal.
The SPD should refer to Active Travel and Active Design guidance to ensure it aligns with NPPF and Sport England policy	Change. The SPD has had additional text inserted in the Travel to School section to link to these.
Concern with regards to the impact on air pollution and noise from cars and buses idling whilst waiting to pick up children	It is acknowledged that this is an issue currently, however the SPD cannot control this. These concerns have been passed to the Council's Highways Department for consideration with a potential action being to enforce no idling policies.
The SPD should ensure that Vision Zero and the Healthy Streets Approach are embedded in all new development.	Change. The SPD text has been amended in the Travel to School section and Transport and Pedestrian Environment section to capture and link to these approaches and aspirations.
Metropolitan Open Land	
Concern that the expansion of the School may lead to planning applications on MOL	The SPD is clear where development proposals are to be located. Any proposal on MOL would be assessed against London Plan and Local Plan policies regarding the protection of MOL. It should be noted that the purpose of the SPD is to confirm all the School's strategic proposals over the next ten years to avoid this.
Requests that guidance relating to MOL is strengthened and specifies taking into account context. More emphasis on the strategic policy protection of MOL across the SPD as a whole: MOL protection is not explicitly listed among the objectives of the SPD	<p>The SPD contains guidance in regard to proposals in the vicinity of MOL that its openness and function must be considered and protected. In this regard, existing Local Plan policies protecting MOL will be applied, and these do not need to be replicated in the SPD but are signposted.</p> <p>Change. Further emphasis on the strategic policy protection of MOL across the SPD as a whole has now been explicitly listed including among the objectives of the SPD (pages 3-4).</p>
Concern about the damage to the biodiversity, trees and wildlife on Metropolitan Open Land	Detailed consideration as to whether any temporary use on MOL is acceptable will occur when formal planning applications are made and this would be

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(MOL) as part of new developments through the impact of construction and decanting strategies	subject to a Section 106 planning obligation agreement. Change. In response to these concerns, additional text is included in the amended SPD to clarify the considerations that will be taken into account for the principle of any temporary use.
The SPD should clarify that site-specific proposals need to accord with MOL policy protection in their own right, particularly with regard to the Richards Music Centre	Where development would be inappropriate, this must be robustly supported by very special circumstances that clearly outweigh the harm to the openness of the MOL, and any other harm. Any site-specific proposals need to accord with MOL policy protection in their own right.
Statements about the MOL should fully and explicitly reflect the Intend to Publish London Plan Policy G3 requirements. Paragraph 5.76 on page 58 for example should be reviewed in this context	Change. Updates have been made to reference the Publication London Plan requirements on protecting MOL in Policy G3.
Accessibility	
Concern that safe egress for people with disabilities is not being met, such as at the Pre Prep School development	The SPD seeks to improve access to School buildings to ensure safe access is secured. This is re-iterated throughout the SPD.
Reference should be made to Streets for All; Advice for Highway and Public Realm Works in Historic Places (2018) which can be used in public realm improvement works	Change. References to these guidance documents have been inserted into the SPD
Overall general support for inclusive access to buildings	Support noted.
Biodiversity	
Support for biodiversity improvements within the SPD and targets within it including diversifying planting and to green areas and protect open space overall	Support noted.
Concern regarding proposals on MOL such as decanting which could negatively impact biodiversity, trees and wildlife on these sites	The area to be used for decanting is currently a multi use astro pitch. The SPD does clarify that a planning obligation would need to be secured ensuring that the land used would be reinstated following cessation of the temporary use. It also states that development proposals should, wherever possible, make a

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	positive contribution to the protection, enhancement, creation and management of biodiversity.
Impacts of buildings can negatively impact light levels in gardens, which can cause issues for biodiversity and trees, and could lead to species loss	These impacts will be assessed at planning application stage. Change. Additional guidance has been added to state that lighting should be appropriate for its purpose in its setting and designed to minimise and provide protection to wildlife
The SPD could consider making provision for Green Infrastructure (GI) within development which could lead to improved access to nature and can also improve public health and quality of life and reduce environmental inequalities.	The SPD highlights the opportunity across many of the proposed sites for green infrastructure to be incorporated such as green roofs, soft landscaping and diverse planting, as well as protecting trees.
The SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework such as guidance on the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment.	The SPD signposts a policy requirement for a net gain in biodiversity and the NPPF requirements. Change. Additional text has been inserted to further emphasise the importance of increasing biodiversity through redevelopment under the Natural Environment section. References to specific improvements that could be made on sites are also highlighted.
The SPD could include guidance that seeks trees being of a species that can grow to building height to help with landscape impacts	The SPD requires that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species 5.86).
Lighting should be designed so that it is not of the bright blue white light that causes issues for biodiversity, and should instead be a warm white tone.	The Council requires that lighting should be appropriate for its purpose in its setting and designed to minimise and provide protection to wildlife. The specific type of light is best considered at planning application stage.
Construction Impacts	
The SPD should reference that where basement development is proposed, it must meet the requirements of the Highgate Neighborhood Plan Policy DH7	The Neighbourhood Plan policies will apply to any proposal within this area and the SPD does not need to replicate or reference all relevant policies. Change. However for clarity text has been added to state that the inclusion of basements within any redevelopment would be supported subject to full compliance with the development plan including the Highgate Neighborhood Plan. As part of any basement development, an impact assessment will be

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	required.
Concern that basement works will lead to excessive noise and vibration to neighbouring properties, and they may endanger the properties' structural integrity	The proposals in the SPD are intended to be delivered over 10 years, and so implementation will be staggered and impacts mitigated. Change. Guidance has been added to the SPD to reference relevant adopted Local Plan and London Plan policies that must be followed to mitigate against construction impacts, in particular referencing the Mayor of London's SPG 'The control of dust and emissions during construction and demolition' (July 2014). Further, the SPD has been amended to advocate that Construction Management Plans should be submitted and where any other development is proposed simultaneously, that the cumulative impacts must be planned for to avoid undue disruption, noise, and emissions during their construction.
The SPD should ensure that a planning obligation or legal obligation that HS obtain and pay for an adequate amount of insurance cover against surrounding damage (both during and after construction	This is not a planning matter and is covered under separate legislation.
The SPD should include a clause to manage construction impacts so that developments are staggered to avoid undue pressure on the highway and general impacts of noise and dust	Change The SPD has been amended to state that Construction Management Plans should be submitted and where any other development is proposed simultaneously, that the cumulative impacts must be planned for to avoid undue disruption, noise, and emissions during their construction.
Construction Impacts will negatively affect existing residents in the area through congestion, noise, dust, including pupils at St Michaels over many months	The SPD has been amended to state that Construction Management Plans should be submitted and where any other development is proposed simultaneously, that the cumulative impacts must be planned for to avoid undue disruption, noise, and emissions during their construction.
Construction Management Plans must be required that respond to the amount of demolition and construction traffic that will be generated	The SPD sets out that that these will be required
Construction should be limited to holidays – works taking place are dangerous to children as seen during previous works at the School	Noted, however the SPD itself cannot limit the duration of construction to holidays. These issues will be fully considered as part of the submitted Construction Management Plan.
Temporary classrooms will be too close to areas of significant development works with associated air quality, noise and traffic and delivery impacts that will endanger children	The School will be required to demonstrate at planning application stage that the temporary classrooms will provide adequate amenity to users.

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Construction works should not be allowed at weekends to give residents respite from long term construction noise and issues	The School will provide Construction Management Plans and liaise with neighbours to ensure disruption is minimised.
The SPD should state that any basement works must include a commitment to produce archaeological assessments, trials and, if necessary, full archaeological excavations given it is in the Highgate Archaeological Priority Area.	Change. The SPD has been amended to reference Local Plan policy on archaeology that requires this in APAs.
Concern about the impact of basement construction on underground rivers which could lead to flooding and the sloping nature of the site could pose issues (Dyne House site)	This is a detailed issues which will be considered at planning application stage.
Community Access	
The SPD should contain much more detail on the School's impact on local people and businesses, how the negative impacts will be mitigated and the positive ones enhanced including more of a commitment to community access e.g. guarantee 10 meeting rooms a year to all local groups and a number of uses of performance spaces per year on an annual basis.	The SPD and the Highgate Neighbourhood Plan both set out an expectation that the proposals should where possible, provide for enhanced community benefits. The extent of access to the new facilities will form part of the assessment of the detailed planning applications for these facilities.
Support for improved community access to facilities overall	Support noted
New sports facilities should be designed to enable community use as this would help the management and maintenance of such uses and would therefore meet Sport England's Policies and the NPPF, paragraph 97	Change. Reference to this Policy and guidance has been inserted into the Mallinson Sports and Far Field site guidelines sections, noting that any access will be subject to safeguarding requirements of the School.
The SPD should make provision that it expects community use agreements to be put forward in respect of the proposed facilities on the Dyne House Site and that those agreements must be the subject of consultation with local residents	The extent of access to the new facilities will form part of the assessment of the detailed planning applications for these facilities via a Community Use Agreement

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<p>The SPD should clarify that community use is different from hire of the School's buildings for private events or commercial use which would lead to additional and unacceptable impacts on residential amenity outside of School hours and term</p>	<p>The Council expects that planning applications will include Community Use Agreements, where appropriate. These will be reviewed by officers as part of the application process to establish the potential benefits and likely impacts.</p>
<p>Concern that existing evening uses already cause traffic problems, and that commercial use, particularly of Dyne House outside School hours/days would be a further impairment of residents' current home amenity.</p>	<p>The SPD seeks sustainable forms of travel to be incorporated into proposals. Additional community use and the impacts of these including transport must be detailed at application stage in a Transport Assessment which takes into account all of the proposals cumulatively.</p>
<p>Island Site</p>	
<p>This is a sensitive site and so the SPD should have further guidance that states that the area between Big School and the Science block should not be regarded as a 'back yard' but part of the historic context of Highgate and the Conservation Area</p>	<p>The SPD references sustainability and access in general so that they cover all sites. Change The guidance has been strengthened to reference the amenity of neighbouring occupiers and to give further detail with regards to the heritage and design solutions that could be utilised.</p>
<p>Suggestion that the SPD should state that proposals to build on or above open space should be resisted</p>	<p>The Council's existing Local Plan policies set out the protection which should be given to designated and undesignated open spaces.</p>
<p>Additional guidance requested for this site to include more detail on design and streetscape along Southwood Lane, heritage impacts, access and useability of the tunnel and amenity, sustainability and safety impacts are considered</p>	<p>The SPD contains guidance on these matters especially regarding access and useability of the tunnel and requirements for improvements .</p>
<p>SPD must provide special protection to guard against further quality of life impacts on the private properties and families therein that are situated in the "Highgate School Island" bound by Southwood Lane, Castle Yard and North Hill on three sides including overlooking.</p>	<p>The SPD contains guidance on this that states 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 and to ensure regards is had to the amenities of adjoining residential properties.</p>
<p>Pre-Preparatory School</p>	

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<p>Requests that the application that has been submitted for this site is not determined until the SPD is finalised, noting that the proposal submitted for planning permission includes 3 classrooms not 2 as specified in the SPD</p>	<p>A planning application for the extension to the Pre-Preparatory building to provide three additional classrooms, a library, covered outdoor play space and level access to the existing school building was granted in January 2021 (HGY/2020/2980). This was brought forward in advance of the SPD as a result of a demonstrable operational need as set out within the application documents.</p> <p>The Council cannot preclude the School coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Haringey Local Plan.</p> <p>Works currently occurring on the site should not be seen as pre-empting the outcomes of the SPD, as provided these have the appropriate planning permissions (and other consents), they can occur notwithstanding the SPD process (a number of representations expressed concern in this regard).</p>
<p>The Orchard</p>	
<p>Request that the SPD states that the School should appoint an Ecological Consultant to produce proposals for the maintaining and improving the area as an ecological teaching space as it is area is an important area in the local green chain ecologically. On the east and south side, it is bounded by the last remaining original pre-development Hedgerow outside Hampstead Heath</p>	<p>It is outside the scope of an SPD to require this for the Orchard – in this instance this is an estate management issue rather than a planning issue.</p>
<p>Other Comments</p>	
<p>The SPD states that the School intends to demolish five Edwardian residences, 4-12 Bishopswood Rd and a further 6,800 sq m of dwellings further along, at 20-24 Broadlands Rd, but in accommodation needs assessment states they are too far to be used for educational purposes, but at page 33 says it is likely the demolition would be required for educational</p>	<p>The SPD does not state they are needed for academic purposes on page 33. It states that the conversion or redevelopment of the site for education would be resisted by the Council on the basis of loss of residential floorspace and in relation to heritage impact. In addition, the location of these sites would not be feasible in relation to the specific academic requirements.</p>

Respondents Comments by Issue	Council's Response / amendments to draft document
purposes. Inconsistent.	
Music rehearsals should be located away from Dyne House as they cause noise pollution to nearby dwelling, and instead be undertaken in buildings in a less populated area	Potential noise impacts will be considered in detail at Planning Application stage with proposed mitigation such as soundproofing and conditions on windows opening thoroughly reviewed.
The SPD does not make clear which School buildings are to be retained or refurbished and which to be demolished	This is set out in section 6 as to the option for each site. Change. Text within this section has been revisited to clearly clarify this
Sport England objects to the loss of sport facilities during construction unless there are measures imposed to mitigate this loss. If no mitigation is provided then this temporary loss would be contrary to the NPPF and Sport England Policy. Sport England recommend that the SPD indicates that the impact of the temporary loss of sports facilities must be mitigated in order to align with national policy.	Change. The SPD has been amended to highlight this expectation.
In 7.1 of the SPD, it is mentioned that the normal 3 year period for consent life-span may be considered. The School should have to function within the normal rules	This has been added as a consideration so that applications can be submitted simultaneously so their cumulative impacts can be assessed, but noting that development is proposed over a ten year period. Without this clause, applications would necessarily need to be submitted individually close to when the construction was anticipated, and so losing the overall analysis that is possible through allowing for them to be submitted and assessed simultaneously.

Appendix 2 – List of Consultees and Respondents

Respondents

1. Delva Patman
2. Highgate Conservation Area Advisory Committee
3. Highgate Society
4. Adam Garfunkel
5. Cllr Liz Morris
6. Jill Kerlake
7. Sport England
8. Christina Nolan
9. Emma Nolan
10. Kingsley Place and Somerset Gardens Residents Association
11. Laura Marshall Rowe and Robert Rowe
12. Highgate Neighbourhood Forum
13. Southwood Lane Residents Association
14. Jane and Ken Price
15. Sarita Singh
16. Nicolette David
17. S.T Fielder
18. John Caird
19. Friends of Highgate Bowl
20. Janet Jones
21. David Causer
22. Stuart Bull & Susan Vinson
23. Nancy Hallett
24. Michael Fadil
25. Jai Singh
26. Arlene Polonsky
27. Pascale Waltho
28. Pete Franklyn
29. James Slessenger
30. Greater London Authority
31. Paul Beuselinck
32. Transport for London
33. Stuart Bull
34. Highways England
35. Natural England
36. Environment Agency

- 37. Rosie Slosek
- 38. Historic England
- 39. Stephen and Leila Hodge
- 40. LB Camden