

From Councillor Sian Berry, Highgate Ward

Comments on Planning Application: 2014/7683/P  
Parliament Hill School, William Ellis School & La  
Swap Sixth Form, Highgate Road



**I support the majority of the proposals made in this application and enthusiastically welcome the investment in quality school buildings.**

However, as a representative of the whole community in Highgate, I have some concerns about two of the buildings proposed: the La Swap sixth form building on Highgate Road and the new Ribbon building at Parliament Hill School, and I do not believe they should be approved in their present form. I would welcome alternative proposals being put forward.

I support the majority of the comments made on these two proposed buildings by the Grove Terrace Residents Association and residents of Lissenden Gardens, particularly those covering the impact on views, light and privacy of local residents, and on the loss of an historical green space.

In brief, I believe the proposals contravene a number of Camden policies, and that they should be rejected for these reasons:

**La Swap building:**

- **Development on historical green space, in appropriate design and impact on heritage** DP25 – development within conservation areas that preserves and enhances the character and appearance of the area, DP26 - impact on neighbours, CS13 – climate change mitigation and heat islands, CS15 - Protecting and improving our parks and open spaces and encouraging biodiversity

**Ribbon Building:**

- **Obstructing light and views for surrounding residents, overshadowing and creating a sense of enclosure:** CS5 – managing the impact of development, DP 26 – impact on occupiers and neighbours, CPG6 – amenity.
- **Carbon reduction policies not followed due to the demolition rather than retention of a refurbishable building** – the Camden Plan states that the Council will be: “leading by example in promoting the Council’s programme of work for carbon reduction on our own estate – from council homes to Camden schools.”<sup>1</sup>

More detailed comments on the two buildings are given below.

**La Swap building**

The location of the building, on the historic ribbon of green space that runs from the Heath, through the Highgate Enclosures, to Gordon House Road (and on the other side of Highgate Road, from Grove Terrace to the railway bridge), is not appropriate. I understand the rationale given for placing the building here, but the exceptional circumstances that could lead to

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<sup>1</sup> Camden Plan <http://www.camden.gov.uk/ccm/navigation/council-and-democracy/camden-plan/>

overriding policies on open space are not met when there are other locations on the sites shared by the La Swap sixth form that exist as options for a new centre.

I agree with objectors that approving this building would damage views on Highgate Road and, if approved in this location, the application would set a dangerous precedent that could reduce the Council's ability to implement its planning policies and restrict further development on nearby sections of this green corridor.

### **Air pollution concerns**

I would also like to see a response from the applicant to the recent report of Parliament's Environmental Audit Committee, which recommended that new school buildings are not located on busy main roads because of the serious effects of air pollution on health, evidence for which is growing fast.

The committee report, published in November 2014, said: <sup>2</sup>

*“Specifically, the NPPF should make it impossible to build new schools, care homes or health clinics near existing air pollution hotspots, and any redevelopment of such existing buildings should only be approved if they reduce pollution exposure for their users. Building regulations should provide for existing schools sited near pollution hotspots to be fitted with air filtration systems.”*

As part of our community pollution-monitoring project in Highgate at the end of 2013, we measured nitrogen dioxide pollution on Highgate Road near the entrance to Parliament Hill School at an average concentration of 72 µg/m<sup>3</sup> – more than 80% greater than the legal limit of 40 µg/m<sup>3</sup>.<sup>3</sup> Traffic on Highgate Road is estimated at more than 14,000 vehicles per day. I would therefore classify Highgate Road as a definite 'pollution hotspot' next to which no new school buildings should be built.

Generally, air pollution is most concentrated near busy roads and reduces as distance increases. Our study confirmed this to be true in this case, finding that further away from the main roads, near the café on Hampstead Heath, levels of nitrogen dioxide were just below the legal limit at 39 µg/m<sup>3</sup>.

I understand the desire to place the sixth form centre at the edge of the school site, as its functions will be shared with other schools within La Swap. However, in view of the proximity of the main road and the proven health risks, I believe that this building should be moved to another location within the site, behind existing buildings. I would welcome the location of this building being reconsidered by the applicant in light of this evidence.

If the application is approved, windows in the new building should not be able to be opened in normal use, and the installation and maintenance of effective air filtration systems should be made a condition, in order to protect the health of the pupils using this building.

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<sup>2</sup> Action on Air Quality, Environmental Audit Committee, Nov 2014

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/212.pdf>

<sup>3</sup> Air pollution in Highgate Ward. Briefing produced by Camden Green Party, January 2014.

[http://camden.greenparty.org.uk/assets/files/localparties/camden/Highgate\\_Greens\\_Air\\_Pollution\\_Report\\_Jan2014.pdf](http://camden.greenparty.org.uk/assets/files/localparties/camden/Highgate_Greens_Air_Pollution_Report_Jan2014.pdf)

## Ribbon building

The main planning issue with this building is its location – it is sited and designed in a way that specifically encloses the mansion blocks of Clevedon Mansions in Lissenden Gardens, coming within less than 18 metres of these flats (we were told at the Development Management Forum meeting that the closest distance was 14.5 metres but this does not seem to appear in the documents and this detail is skirted over in the Planning Statement).

As the building comes within a distance of existing residences that is against planning guidance, it's location and floorplan should be rethought and moved at least 4-5 metres further away from Clevedon Mansions before it can be acceptable. Camden's planning guidance states that mitigation measures are only for 'when overlooking is unavoidable'<sup>4</sup> and, with a large site available, this is not the case in this instance.

That effects on the light and views of residents of Clevedon Mansions are likely to be dramatic is obvious from the illustrations already released, and are also clear from reading the detail of the Daylight and Sunlight report. The flats in these blocks have large rooms, and the report authors admit that they did not use floor plans but made assumptions about the average size of the room. However, the report still concludes that there would be a loss of light to many of the rooms in the block, and that:<sup>5</sup>

*"In those situations where there are derogations from the BRE Guideline daylight values, these are occasioned by the fact that the baseline values for the affected windows/rooms are very low due to the location of the windows/rooms in question. The small actual VSC alterations occasioned by the construction of the proposed scheme result in disproportionate % losses which fall outside of BRE Guidance."*

In other words, the homes most affected are already suffering from low light levels that will be reduced further by the building. Residents in the blocks have already submitted comments that show many of the residents in ground floor flats are elderly or physically impaired and spend large amounts of time at home. Therefore the likely impact on their lives will be larger still. It is also not completely clear from the drawings in the appendix of the Daylight and Sunlight report that the second phase of the Ribbon Building (the extension over the footprint of the current Heath Building) has been included in the assessment, as it is not shown in the drawings.

It is very disappointing that, so far, no visualisations have been released to show the new views that will be experienced by residents from their homes, as this would make it much easier for them to judge its effects, and for Camden's officers and the Development Control Committee to determine if they are acceptable. I have on several occasions, alongside residents, asked for these visualisations to be produced and believe that the applicant should be required to produce them – and that local residents should have additional time to scrutinise these and submit their opinions.

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<sup>4</sup> Camden CPG6 - Amenity [http://www.eustonareaplan.info/wp-content/uploads/2014/04/CG1-CPG6\\_Amenity1.pdf](http://www.eustonareaplan.info/wp-content/uploads/2014/04/CG1-CPG6_Amenity1.pdf)

<sup>5</sup> Daylight and Sunlight report, Point Surveyors, June 2014.

<http://camdocs.camden.gov.uk/webdrawer/webdrawer.dll/webdrawer/rec/4975882/view/>

Members of the Development Control Committee should also ensure they are given a site visit that demonstrates the proximity of the footprint of the proposal and illustrates the height of the planned building. They should also be able to be shown inside the affected flats.

An additional problem with a building that comes so close to existing residences, and which will be occupied during school time with many hundreds of people (some of whom may occasionally be bored and looking out of the window for long periods) is that of overlooking and its impact on privacy. The illustrations showing 'mesh screens' to be added to the new windows do not so far give sufficient evidence or reassurance that this problem has been mitigated. Again, accurate visualisations of the views from the new classroom windows should be provided for local people to scrutinise, with additional time given for their comments to be made.

### **Demolition of the Heath Building**

Finally, I have concerns that the option of retaining the existing Heath Building has not been fully explored. While I applaud the desire to construct the new building to Passivhaus standards, this level of energy efficiency could be achieved with a refurbishment and extension proposal for the existing building, retaining its concrete core.

Figures provided by the applicant that say the embodied carbon lost will be 'saved' by two years of operation of the new building are curious (I cannot find them in the application documents, including the Sustainability Statement, although this information was provided in the consultation materials).

A Passivhaus building does not actively remove carbon dioxide from the atmosphere, but simply creates far lower levels of emissions than most buildings. Therefore the 'saving' quoted must be in comparison to some alternative that emits more carbon. In this case this is presumably the operational carbon footprint of the current Heath Building if no redevelopment were done.

These figures therefore do not convince me that the rebuilding proposal is a preferable option in sustainability terms to a refurbishment of the Heath Building to Passivhaus standards, with extensions if needed to create larger classroom sizes and any additional rooms required. In fact the figures reinforce the desirability of this by admitting that it will take two years of operation of the new building before any effective carbon saving is made by the proposal being put forward in the application. In contrast, for a refurbishment, real carbon savings would start almost straight away.

The problems highlighted by objectors in terms of construction traffic, and the potential saving of many heavy vehicles used to remove old materials and bring new ones in, only add to the evidence that lower impact options than this building are feasible, but have not been fully pursued.

**January 2015**