

# Mill Hill Preservation Society founded 1949

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For the attention of **Mr Andrew Dillon**, Principal Planning Officer  
London Borough of Barnet  
Planning & Building Control  
2 Bristol Avenue  
Colindale  
London  
NW9 4EW

24 September 2024

Your Ref: **16/6662/FUL**

Our ref: LFMHPS1 Planning

Sent by email only to: [planning.enquiry@barnet.gov.uk](mailto:planning.enquiry@barnet.gov.uk)

Dear Mr Dillon,

## **TOWN AND COUNTRY PLANNING ACT 1990**

**SITE:** Hasmorean High School, 2-4 Page Street, London NW7 2EU

Demolition of existing Girls school and construction of a new combined Boys and Girls school with vehicular access from Champions Way including 167 car parking spaces and 220 cycle parking spaces, three pedestrian accesses north, east and south of the site, along with associated landscaping (including swales), sports and recreational areas and ancillary buildings for energy centre and service yard, security gatehouse. School drop-off and pick-up space will be set out adjoining land.

**PLANNING REFERENCE:** 16/6662/FUL

## **1.0 Introduction**

The Committee of Mill Hill Preservation Society has taken the opportunity to review the amended plan and comment as follows:

It has been almost 8 years since this application was originally submitted and many changes have occurred within the Planning system that **it is surprising that an addendum to such a large-scale development within the Green Belt is deemed reasonable.** It is understood that the earlier iterations of the proposals were halted as a result of a holding direction from the Mayor of London based on Green Belt and Transport concerns. **The alterations to the scheme seem to equate to merely the removal of the proposed 3G all-weather pitch in the south west corner of the site and the removal of the proposed drop-off point to the north of Champions Way.**

The Society made detailed comments on the original scheme dated 7<sup>th</sup> December 2016 (ref: jl/KH/MHPS Planning). Many remain extant today and we wish for them to be taken into consideration along with our further comments that follow, with the necessary updates, having regard to any change in policies and the scheme.

## 2.0 Planning History

A new 2-form entry and 6th form school for 350 pupils (Girls' school) with parking and hard play was approved with conditions on 22nd November 1972.

Two main conditions were applied to ensure the free flow of traffic and the maintenance of trees and landscaping as a local asset. There have been a couple of attempts to build the boys' school next to the girls' school, the last details we can establish being application W0099AK that was turned down for the following reasons:

1. The proposed development is not compatible with the principal function and character of the Green Belt.
2. The proposed development would be prejudicial to the residential and visual amenities that occupiers of neighbouring properties may reasonably expect to enjoy.

## 3.0 Green Belt Matters

The site is located within the designated Green Belt, within which development is considered to be inappropriate, other than for certain exceptions. This proposal does not fall within the definition of any of the exceptions set out in paragraphs 154, 155 or 156 of the NPPF.

Accordingly, for development to be considered appropriate in this location, the Applicant is required to demonstrate that '*very special circumstances*' exist. There is no definition of what can constitute '*very special circumstances*', and each application must be considered on its own merits in this regard.

What is clear from decision making is that the greater the impact on the openness of the Green Belt, the higher the bar is for demonstrating a '*very special circumstances*' case. In this particular case, the impact of the proposal on the Green Belt of almost three times the number of pupils at the site, over and above the modest form of development that currently exists, is huge. The removal of the drop off point does prevent incursion north of Champions Way, but changes little in terms of the wider impact, with the removal of the 3G pitch also being of benefit but changing the overall massing of the proposal very little.

## 3.1 Alternative Site Options

The Addendum to the Planning Statement provides little by way of an update on the need for these works, merely advising that the need remains the same.

It would be entirely reasonable for this to be quantified and forecast to ensure what may be a short-term problem does not result in a long-term permanent impact to the Green Belt.

The Applicant should be required to update any needs assessment provided within the original Planning Statement to demonstrate that there remains a long-term need for this school. This is having regard to the falling birth rates currently seen across England and particularly in London that has begun to reduce pressure on primary school demand which will be filtered through to secondary in the coming years. Indeed, over-subscription to a school is not in itself a justification, as there are many schools in Barnet that are oversubscribed.

Given the site's location within the Green Belt it is essential that development be restricted to that reasonably required rather than provide a preference.

Further, it would be normal practice, certainly, for DfE proposals, to demonstrate that there is no alternative more suitable site available for this development within the Borough. It is welcomed that some attempt appears to have been made to consider a rationalization of the scheme and accommodation on the existing developed area, unfortunately the DAS addendum is completely illegible and therefore cannot be assessed.

There is also a suggestion that alternative sites have been considered, but again this information seems to be missing from the DAS where it is suggested that it is included. It is essential that this information be provided to enable it to be critically assessed. However, the indication that only 3 alternative sites were considered is not deemed to be particularly robust.

Whilst the desire to co-locate the schools is understood, there is insufficient evidence to demonstrate that shared administrative functions cannot continue to be located on one site but serve multiple sites, as is the case at present. Equally there are several local schools which operate across multiple sites and where staff have to travel between teaching locations. The Borough is not that large that it would result in excessive journey times to move between two sites.

The approach to need and alternative sites appears to be weak and lacking, such that the scale of development and its associated impact on the openness of the Green Belt is not outweighed. It is the opinion of the Society that this does not represent '*very special circumstances*' in this case.

The time lag between the original submission and this addendum results in all the need information and justification being provided historically is now significantly out of date and should be updated prior to the consideration of any determination on this application.

#### **4.0 Tree Protection & Climate Change**

Within London generally trees and open space offer much needed breaks in the dense urban form and from the road networks. The trees on this site were protected to ensure they were

retained in the long term and not removed to make way for more parking or development on the site, removing its more rural character and eroding the feel of green space as you approach and move beyond the site, whilst also providing a verdant setting and framing the school buildings.

The proposal includes the loss of a significant number of trees and groups of trees that are not replaced and due to the site layout cannot be replaced. This results in a loss of climate change mitigation and yet the site seeks to significantly increase the number of vehicles coming to and from the site during the course of the day.

It is highly likely that additional pressure will be placed on the Authority in the future to approve the removal of trees due to their impact on the proposed courts, training areas and MUGA that will become overshadowed by trees and covered in leaf fall on a regular basis. **The practicalities of such a dense form of development in this area, will undoubtedly lead to pressure on the further loss of trees, in addition to the significant number already proposed to be removed.**

#### **4.1 Biodiversity & Ecology**

The site is a hive of ecology, which with the existing space around the school buildings is allowed to thrive. The proposed development not only fills a significant amount of this space reducing the habitats available to those species, and in doing so it also reduces the flora and fauna available. In addition, the plans include 2.4m welded mesh fencing surrounding the whole site, which would not let wildlife pass through. Furthermore, it is not clear who would be responsible for maintaining the narrow periphery footpaths.

**MHPS believes that the public amenity value of the trees and hedgerows are considerable, and removal or reduction would have a significant negative impact on the local environment and its enjoyment by the public. The trees are clearly visible from public places, contributing significantly to the character and appearance of the area as well as having significant ecological value for nature conservation.**

Given the lack of consideration of alternative sites, these habitats are being unduly eroded in a Borough that has declared a climate emergency.

#### **5.0 Impact on Neighbours**

The application fails to consider the impact on residential properties surrounding the site. This application will more than double the nature of the use of the site and with the inclusion of a synagogue will operate every day and not be restricted to school hours and weekdays. The properties located to the south of the site fronting the Great North Road, whilst constrained in outlook from the front of their properties by the elevated section of the A1 and the associated noise environment, they have had the benefit of the swathe of open space to the rear and a more peaceful rear garden environment.

However, these proposals will significantly reduce the amount of open space that remains, with a narrow strip of open space only really suitable for the footpath proposed. Due to the topography of the site, the proposed school building will rise above the area, sitting at a significantly greater height than the two-storey dwellings, whilst the noise generated from the outdoor sports and play areas will be constant.

These properties are already significantly hindered by the A1, that this further impingement will be excessive and detrimental to their environment, resulting in residents having little time with no noise in their environment.

## 6.0 Transport & Highway Impact

Given the time that has passed since the application was last considered, we are exceptionally surprised to find that no new transport information has been submitted with these amendments.

The road networks around the school have become busier with the housing growth seen locally and this must be considered as part of these amendments. This is increasingly important as a result of the removal of the proposed drop-off point to the north of Champions Way.

A new full transport statement should be provided to demonstrate that the proposal will not have a detrimental impact on the surrounding road network, whilst also demonstrating how the school drop-off and pick up will now work.

The plans at present have no provision for any child drop-off and whilst it is acknowledged that some will get a bus or walk to the school, many will not and this will lead to an increase in on street parking, or ad hoc drop offs to the detriment of the safe and free flow of the highway network.

As the school has not issued a revised Travel Plan, we dispute their statement that "the school will operate maximising sustainable transport modes with high reliance on walking, cycling and public transport." Already there are severe problems in local streets at drop-off and pick-up times with double parking, entrances to local houses having their drives blocked as well as 6th form students parking their vehicles in neighbouring streets all day long. A bigger school, with a larger catchment area, is going to greatly exacerbate these problems.

## 7.0 Conclusions

The applicant has failed to submit sufficient evidence to demonstrate that '*very special circumstances*' exist to justify this development in this Green Belt location, whilst also failing to demonstrate that there will not be a severe impact on the safe and free flow of the highway network. There is insufficient consideration of alternative sites that would not result in the harms identified.

The evidence must be up to date as the reliance of evidence that is now over 7 years old is to err in law. This is exacerbated by evidence referenced either being illegible on the webpage or it is no longer relevant to the consideration of the application and must be re-visited.

The extent of tree loss is significant. These trees were protected to prevent this sort of development occurring. The loss is unjustified based on the dated evidence submitted with this application and the lack of consideration of alternative sites.

In addition, the loss of ecological habitat and open space weighs against the proposal, with existing habitats being lost and not replaced, moreover the extent of noise and movement associated with a school of this size will likely disturb any retained habitats.

The proposal represents inappropriate development in the Green Belt that will have a detrimental impact on protected trees, ecology and residential amenity, whilst resulting in a significant loss of open space and significant likelihood of gridlock on the adjacent road network.

The Applicant needs to provide a substantial amount of additional information to demonstrate how this proposed outweighs the harm identified that would weigh in favour of the development when considering the planning balance test.

The Society respectfully suggests that the application be refused. Please be in touch if you require further information.

Yours sincerely,

*Kevin Green*

Mill Hill Preservation Society  
On behalf of the Committee and the Planning Group

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