

The Archway Campus Joint Action Group

This objection to P2024/2598/FUL Archway Campus, 2-10 Highgate Hill, London, N19 5LP [Holborn Union] is submitted on behalf of the Joint Action Group (“JAG”) which is made up of the following organisations:

- The Academy Residents
- Barrangreen Property Management (The Academy, Highgate Hill)
- Despard Road Residents
- Friends of Waterlow Park
- The Heath and Hampstead Society
- The Highgate Conservation Area Advisory Committee
- The Highgate Neighbourhood Forum
- The Highgate Society
- The Islington Society
- Lidyard Road Residents
- The Waterlow Trust Park Advisory Group
- Waterlow Road Residents
- Whitehall Park Residents Association

This joint objection supplements individual objections submitted or to be submitted by any of the above organisations and it should be read in conjunction therewith.

Introductory comments

For the reasons set out herein, the Council is bound to refuse the application.

Indeed, the application is bound to be refused on the basis of each of the policy breaches and other relevant planning considerations cited herein alone without having to rely solely upon the overwhelming impact of the cumulative nature of the policy breaches and the other relevant consideration which militate against approval.

The JAG has summarised the manifold policy breaches and other relevant planning considerations in the “Executive Summary” section immediately below.

A full explanation of the policy breaches and other relevant planning considerations can be found in the “Detailed Explanation” section immediately following the executive summary. Further, the JAG has set out the relevant policies themselves in Appendix 1 hereto.

Executive Summary of the Policy Breaches

Affordable Housing

- The developer’s figure of 51% affordable housing is achieved by excluding the student housing, by the provision of large number of 1 bed and studio units and counting units rather than bedspaces.

- Of the affordable housing to be provided, it is clear that this does not meet either housing policy or local need either as percentage of total or mix.
- In terms of mix, including the student housing, 76.4% of the site is being developed as studio or 1 bed units when there is a demonstrable need for family units on this site.
- The high number of small units increases the percentage figures of affordable housing when calculated by this method rather than bed spaces. The high number of small units inflates the perceived amount of affordable housing being provided rather than reflecting the number of bedspaces being provided.
- 100% of intermediate housing offered is studio or one bedroom and is Discounted Market Rents (DMR) rather than London Living Rents (LLR)
- The affordable housing is poorly designed with too many single aspect flats with poor outlook and which result in overlooking internally on the site and into neighbouring properties

Student Accommodation

- The Archway Campus site does not meet Islington Local Plan for student housing, as it's not an allocated site for this purpose.
- The Local Plan prioritizes conventional and affordable housing over student accommodation due to land scarcity and existing high numbers of student beds in the borough.
- Provision of student housing is a popular developer's tool as, not only does it provide considerable tax breaks and the avoids the payment of Council Tax by the operators, but it also skews the percentage figures of affordable housing in the developer's favour.
- The inclusion of student housing in the scheme reduces the overall affordable housing provision to 22% by unit and 30% by habitable room, falling short of policy requirements.
- Seven Capital has no nomination agreement with a higher education provider.
- Recent data shows a 16% decrease in international student visa applications, contradicting the developer's claim of increasing demand for student accommodation.

Tall Buildings

- The Archway Campus site is not designated for tall buildings in the Local Plan.
- The tower breaches London Plan Tall Buildings policy which states tall buildings should only be developed in locations identified as suitable in Development Plans.
- The proposed tower would create an oversized and damaging landmark, contrary to the Local Plan which requires tall buildings to create a positive landmark within the townscape.
- The proposed tower would interfere with strategic views to St Pauls Cathedral and strategic views from Kenwood.
- The applicant has provided many unrepresentative views of the tower carefully taken from points where the tower is partially or wholly obscured.

Heritage Impact

- The proposed scheme would cause significant harm to the setting of major heritage assets, including Grade I and II* listed gardens, parks, and buildings.
- Much of the heritage of the Infirmary Building will be destroyed.
- The scheme would be highly damaging to the setting of seven Conservation Areas. Four Conservation Areas are Islington, two in Camden and one in Haringey.
- The scheme does not offer the required substantial public benefit to bypass the protection of Heritage Assets as it does not meet housing need.
- The scale of the damage to Heritage Assets has been consistently underestimated within the application, in particular the damage the 27 storey tower would cause.

Impact on Neighbours

- There would be significant daylight reduction for Lidyard Road, Despard Road, and The Academy properties.
- Too many units within the development fail to meet BRE daylight standards.
- Block A's upper floor balconies and windows pose potential visual intrusion and privacy concerns for neighbouring properties as well as intrusive noise when the balconies are used and when windows are open.

- Proposed building distances from neighbouring properties are as little as 10.9 meters which will result in an unacceptable loss of privacy.

Open Space

- The quality of the proposed open space is very poor, being largely paved, heavily overshadowed and very likely to be affected by wind blight from the tower.
- The proposed scheme does not provide anywhere near the required amount of play space as set out in the London Plan – with no play space for 12+ years as well as relying on access to play space outside the site.
- The proposed doorstep play area is totally inadequate - it's a very thin strip with no room for play equipment and only 12% would receive 2 hours of direct sunlight.
- The two play spaces for 5-11 year olds will be heavily shaded with only 38% receiving 2 hours of direct sunlight.

Biodiversity

- The application fails to meet the mandatory 10% Biodiversity Net Gain (BNG) requirement, achieving only 8.54% BNG.
- The proposed off-site offsetting is unacceptable given the size of the site.
- Green roofs are treated superficially and their viability is highly questionable due to potential overshadowing and wind effects from the tower.

Support for the Plan B option

- The applicant had produced a proposal for a low rise scheme which, following extensive consultation, was supported by the local community.
- This scheme still provides large numbers of housing - and with a 2 year build rather than a 5 year build required for Plan A housing, will be delivered more quickly.
- While Plan B offers 45% affordable housing it should be possible to make adjustments to increase this.
- Plan B greatly reduces the impact on neighbours in terms of overlooking, and loss of daylight.

- Reuse of the Staples Building, the Nurses Accommodation and Furnival House is a far more sustainable approach than demolition and re build and results in far less damage to onsite heritage assets.
- Removing the tower from the scheme results in no damage to off-site heritage assets including Grade I and Grade II* listed gardens, parks and buildings and no damage to the setting of seven Conservation Areas.
- Plan A, as submitted, has not been consulted prior to submission therefore community engagement on this scheme, has not taken place.

Detailed Explanation

A) AFFORDABLE HOUSING

The JAG objects to the applicant's allocation of affordable housing within this scheme. Whilst the site has the potential to deliver a significant amount of genuinely affordable housing to meet identified housing needs, the Group does not feel this scheme achieves this either in meeting policies, mix or need.

Throughout the application for Option A as submitted for planning approval, it is claimed that the site, will provide 51% affordable housing and this appears to be the driving force behind the decision by the developers to proceed with Option A.

There are a number of issues which indicate that the claim of 51% is inaccurate and unachievable. It includes some severe breaches of policy under London and Local Plans and does not meet local housing need. These are enumerated below.

1. Percentage quantity of affordable housing

- 1.1. The London Plan 2021 Section 4.4.1B and Islington's Local Plan 2023 Policy H4A.3.40, sets down that affordable housing should be a minimum 35% but 50% for sites which currently or have been in public ownership and are without public subsidy.
- 1.2. The site, previously having been owned by University College London, can clearly be demonstrated as one which has been in public ownership, thus requiring under London and Islington Plans that a minimum of 50% affordable housing should be provided on site.
- 1.3. The developer has quoted 51% affordable housing will be delivered on the site. To achieve this, the developer has adopted various devices as listed below, none of which represent an accurate assessment of what is being delivered in relation to policy and local need. These are dealt with below.
- 1.4. There is a further danger of reduction in affordable housing. It is very common for the high construction costs on major developments to be used as a reason to seek viability assessments so a lack of binding commitment

raises serious concerns over the quantity of affordable housing which may actually be delivered.

2. The calculation of affordable housing

- 2.1. Provision of student housing is currently a popular developer's tool as, not only does it provide considerable tax breaks and it avoids the payment of Council Tax by the operators, but it also skews the percentage figures in the developer's favour
- 2.2. The developer has specifically excluded the student housing from the calculations. This is a breach of policy. The developer has stated in their documents that the affordable housing equates to 22% by unit and 30% by habitable room when taking student accommodation into account.
- 2.3. As a result, an accurate assessment of what the site has the capacity to provide is not being made. The developer's claim of 51% figure for affordable housing is based on a percentage of the number of units on the site excluding the student housing provision.
- 2.4. The application document shows the whole site as providing 420 units in total. Of this total, 242 are student houses, 91 are affordable housing and 81 private housing.
- 2.5. The Joint Action Group (JAG) believes the exclusion of the student housing, which does not require any on site affordable housing provision (see Student Accommodation section of objection) is simply a device by the applicant to avoid delivering the full potential for the site to provide affordable housing, whilst maximising the profitability of the scheme. The developer has failed to prove there is any need for this as demonstrated in Student Accommodation section of this report.
- 2.6. The developer's figure of 51% excluding student housing does not reflect the number of people being accommodated in affordable housing on the site as it is based on numbers of units rather than habitable rooms or bedspaces. The use of bedspaces in the calculations gives a more accurate view of the number of people capable of being housed in any development.
- 2.7. Using the accommodation schedule submitted with the application in Section 8 of the Design and Access Statement there are 614 bedspaces being provided on site under all tenures excluding the student housing.
- 2.8. Of the affordable housing, the majority of units are 1 bed or less and as such only provide 1 or 2 bedspaces per unit. In comparison a 3 bed unit could provide 6 bedspaces per unit.
- 2.9. Of these 614 bedspaces, 260 are affordable housing whilst the private housing provides 354 bedspaces. This reflects the fact that the majority of private housing is large units. This works out as 42% affordable and 58% private well below the quoted 51%.

2.10. Calculating on the same basis of bedspaces but including the student housing, 242 studios of 1 bedspace need to be added to the mix giving a total of 856 bedspaces. On this basis, the proportion of affordable to non-affordable being provided on the site reduces to 30.4% affordable and 69.6% private

3. How this does not meet housing need?

3.1. Taking the student housing and private housing into consideration, the number of studios and 1 bed units rises to 321 units on the overall site. This is a shocking 76.4% of the total number of units. This categorically does meet local housing need, as set down in Policy H1 of the Local Plan which states that the size mix of new housing must reflect local need, with priority for units suitable for families.

3.2. Table 3.2 of Policy H2 of the Local Plan gives the mix of housing sizes required. Although not specific as to percentages this shows a clear need for larger family units both at social rent level and intermediate rent level. Please note that London Living Rent is cited in the developer's texts but does not appear in tables.

3.3. Table 3.2: Housing size mix priorities for each housing tenure in the Islington Local Plan – Strategic and DM Policies DPD Regulation are:

Tenure	Studio	1 bed	2 bed	3 bed	4 bed
Social rent	none	low/medium	high	medium	low
Int. DMR	none	medium/high	medium/high	medium/none	low/none

3.4 Making broad assumptions as to what percentages the categories low, medium and high amount to, the table below gives an indication of where the mix meets policy and where it fails. Please note this table excludes the student housing.

totals tenure type - intermediate	no. units provided	percentage total	local plan requirement	compliance with local plan
studios	5	15.2	none	no
1b including wheelchair	28	84.8	medium/high	no
2b	0	0.0	high	no
3b	0	0.0	medium	no
4b	0	0.0	low	no
	33	100.0		
Total tenure type - social rent				
studios	0	0	none	yes
1b including wheelchair	28	48.3	low/medium	no
2b	19	32.8	high	no
3b	9	15.5	medium	no

4b	2	3.4	low/medium	yes ?
	58	100		

3.5. On this basis, Islington needs to question whether this development, which will create a ghetto of small units, is fulfilling its obligations to provide family housing. It also has to look at the impact this large number of small units will have on social cohesion (see below)

4. Intermediate rent provision

- 4.1. The split between various types of affordable housing also needs to be examined. Islington's Local Plan Policy H3: Point J. states that affordable housing should be broken down to 70% social rented housing and 30% intermediate housing (ie higher priced affordable housing).
- 4.2. Under the Islington Strategic and Development Management Policies, Policy H3, the borough prioritises affordable housing tenures for low income residents such as social rent or London Living Rent (LLR). Policy H1E states that the majority of units provided should be LLR.
- 4.3. However the tables submitted with the application indicate that all intermediate units of affordable housing will be Discounted Market Rents (DMR) and no LLR is to be provided.
- 4.4. As the developer's own assessments state, the vicinity of the site is an expensive area. Market rents in this area will be high and thus unaffordable for many. There is no commitment we have seen regarding the level of rent to be charged on the intermediate units which, without a binding commitment, could be as high as 80% of market rates. This raises the question as to what proportion of market rent becomes affordable. 80% of market rent in this area will still be unaffordable and does nothing to address housing need.
- 4.5. The report is unclear on the tenure but the tables suggest that there will only be one form of intermediate housing and that will be DMR although, confusingly, elsewhere, LLR is included but conflated with the DMR.
- 4.6. The developer states affordable student housing is to be provided off site. There is little detail on this other than a mention of 35% provision. There are no details of how or where this would be provided and bearing in mind the shortage of development sites in Islington, it is more than likely that this will be translated into a commuted payment. Whilst it is not known what the policy on commuted sums is within Islington, it is noted that many London Boroughs do not permit these.

5. Poor design of affordable housing

- 5.1. The affordable housing is being provided in 3 new build 6 storey blocks, A, B and C, facing onto Highgate Hill. The developer states that the affordable housing will be of exceptional design quality. JAG disputes this and objects to the design of these units for the following reasons. In terms of design, to maximise the number of units being provided on site new blocks A and B are

6 storey, deep plan buildings and thus result in a number of single aspect dwellings with poor outlook. This is contrary to the recommendations in London Plan policy D6 3.6.5 which states that single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and therefore should normally be avoided.

- 5.2. To deal firstly with Block A. This is the most northerly block, with a number of single aspect dwellings and is built 4.5m away from the boundary with the Academy and The Barn, existing residential buildings. It also closely impacts on the adjacent Lidyard Road houses. A typical floor has 7 units, of which 3 are single aspect. The other 4 are corner units.
- 5.3. Policy D6 3.6.5. states that the design of single aspect dwellings must demonstrate that all habitable rooms are provided with adequate privacy. Block A has considerable impact on the privacy and overlooking to the north not only of the residents of the adjoining properties to the north but those of the new block. Although this policy specifically relates to single aspect dwellings, all north facing habitable rooms in block A share the same problem.
- 5.4. Block B is a rhomboid shaped building with a small triangular inner court, again deep plan. This has flats around the perimeter with all habitable rooms looking outwards. To get round the presumption against the provision of single aspect flats, the communal areas, which would normally be enclosed, are in this case formed by a small court with access to the flats provided by open deck access. This may technically meet the requirement for natural ventilation mentioned below, but the court is tiny, and is essentially a light well providing minimum ventilation but nothing else. It will be a dark and dank space offering little by way of amenity or outlook for the otherwise single aspect flats and the deck access will be a magnet of antisocial behaviour. The triangular Block C is shallow plan, thus avoiding the issues of single aspect.
- 5.5. The north facing single aspect dwellings of Block A, as well as those on Block B, give poor amenity for the occupants and breach design guidance that the orientation should enhance amenity, including views. Meanwhile any south and west facing windows must also demonstrate how they will avoid overheating through solar heat gain without reliance on energy intensive mechanical cooling systems

B) TALL BUILDINGS

1. Unsuitable Site for Tall Buildings

- 1.1. The Archway Campus site has not been identified as an area of Archway *suitable for tall buildings* and is therefore contrary to the Local Plan DH3 B(i) which states that tall buildings are only *acceptable in principle* on allocated sites in the Local Plan or B (ii) *within specific sites identified in a Spatial Strategy area*

- 1.2. We note that the only Archway sites designated for tall buildings over 30m are identified in Spatial Strategy SP 7 Archway (Hill House, Vorley Road Bus Station, Southern end of Macdonald Road) and these would be at heights of no more than 12-15 storeys and potentially less. The proposed tower is 27 storeys!
- 1.3. Islington's allocation of tall building sites has been based on its Tall Building Study 2018 which did a thorough review of the suitability for tall buildings at Archway and confirms that a tall building is not considered suitable for the Archway Campus site as it would *detract from the character of Holborn Union Infirmary Conservation Area, and would intrude on the Local View to St. Pauls from Archway Bridge*'.
- 1.4. The tower is also contrary to the London Plan Tall Buildings policy D9 B3 which states that *Tall buildings should only be developed in locations that are identified as suitable in Development Plans*

2. An out of scale and damaging Landmark

- 2.1. The proposed tower would be 82m high and will result in an oversized, oppressive and highly damaging landmark and contrary to Local Plan Policy DH3 E which states that tall buildings must create *a positive landmark within the townscape*
- 2.2. The applicant's statement in DAS 8.43 is quite frankly laughable when it states that the tower "*would be a peripheral element in the wider context, appropriately marking Archway Town Centre*
- 2.3. Furthermore, The Tall Buildings Study 2018 sets out that *There is already a tall building that marks the location of the station and an important road junction* and at 56m high the Study describes the Archway Tower as *Not in context with the height of the surrounding area* and that it *dominates the area*. The proposed tower would be 82m so higher than the current Archway Tower
- 2.4. The proposed tower will be totally out of proportion and incompatible with the scale of the buildings on the Archway Campus site and the rest of Archway, including the 3 other Archway towers, and therefore contrary to Local Policy DH3 E(iv) which states that tall buildings should *Be proportionate and compatible to their surroundings and the character of the area* and DH3 E(v) which states *that any tall building should positively contribute to the skyline and to the immediate locality*
- 2.5. Due to excessive height of the tower there will be no transition from the 27 storey tower to the lower sections of the development, or the even the 3 existing Archway towers or the much lower streetscape of Archway – this is in breach of Islington's Local Plan DH3 E(vi) which states that a design of a tall building must *Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;*

3. Damage to strategic and local views

- 3.1. Covered in section D) Heritage below
- 3.2. London Plan policy D9C1 i, ii and iii states that Tall Buildings should *not adversely affect local or strategic views* but should make a *positive contribution* and that the impact of long-range, mid-range and immediate views must be taken into account

4. Damage to views into central London

- 4.1. Tall buildings in the City of London, Docklands and the West End are distant, forming part of the cityscape. However with the top of the proposed tower rising to 141.5 meters above sea level it would interrupt views in a startling and damaging manner from Whitehall Park, Hornsey Lane and Highgate into the London basin. It is in effect bringing an inner city building to Archway and the sense of distance to inner London will be lost.

5. Highly damaging to designated and non-designated heritage assets and their settings

- 5.1. The tower will be highly damaging to the setting and significance of non-designated heritage assets as covered in section D) Heritage below
- 5.2. This is contrary to Islington Plan policy DH3 E(iii) that states that any tall building must *Conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance (including in neighbouring boroughs where impacted);*
- 5.3. We note that the policy above **includes protection of heritage assets in neighbouring boroughs, not just the impact in Islington**
- 5.4. Furthermore London Plan Tall Buildings D9 Cd states that proposals should *avoid harm to the significance of London's heritage assets and their settings... The buildings should positively contribute to the character of the area*

6. Windblight

- 6.1. We have major concerns about the wind blight likely to be generated by the 27 storey tower and the impact this will have on the town centre space designated for the base of the tower and believe that further analysis is required as there is already wind blight from the existing tower.

PHOTO MONTAGES OF THE TOWER

Views generated by the Archway Campus Joint Action Group unless otherwise specified



View from Grade II* Waterlow Park



View from Grade II* Waterlow Park



View next to Grade II* St Joseph's Church



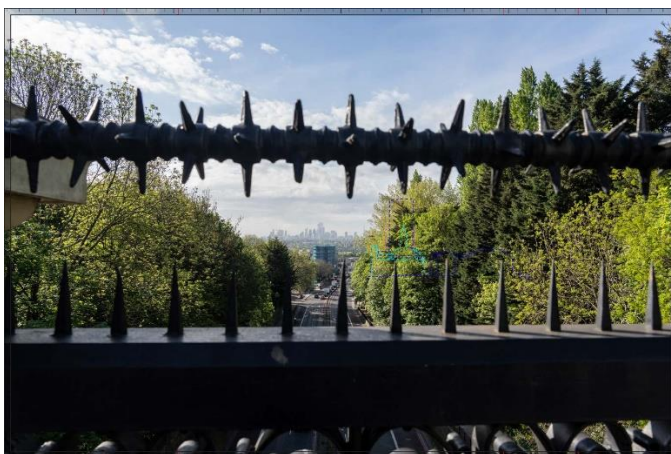
View next to Grade II* St Joseph's Church



View provided by Seven Capital from a position where a bush obscures the tower



View from Grade II listed Hornsey Lane Bridge (standing in the middle of the bridge)



View from Grade II listed Hornsey Bridge provided by Seven Capital



View from Grade II listed Hornsey Bridge provided by Seven Capital



View of locally listed Archway Tavern in the St John's Grove Conservation Area (image provided by Seven Capital)



View with locally listed Brendan The Navigator Public House provided by Seven Capital cropped to 50mm from their 24mm image which provides a more accurate picture of the impact of the tower to the human eye.



View next to locally listed Holborn Union Infirmary Building



View from Pemberton Gardens in the St John's Grove Conservation Area



View from Lysander Grove in the Whitehall Park Conservation Area



View from Parolles Road in the Whitehall Conservation Area - cropped version of Seven Capital's image



View from Parolles Road taken from approx. 5m north of the image above.



View from Hampstead Heath in the Hampstead Conservation Area overlooking the Boating Pond

C) STUDENT ACCOMMODATION

1. The Archway Campus has not been identified as a site for student accommodation

1.1. The Archway Campus site does not meet Islington Local Plan Policy H1 M for student housing as it's not an allocated site ... *student accommodation is restricted to allocated sites or sites in existing use as purpose built student accommodation or where there is a wider master-planned approach to consolidate and reconfigure educational floorspace on a university campus.*

2. Conventional housing a priority in Islington – not student accommodation

2.1. Because of the shortage of land in Islington the Islington Local Plan 3.15 states that student accommodation is *not considered the most appropriate use of the land that is available in terms of maximising uses which deliver the objectives of the Local Plan, including meeting housing needs, and will generally be resisted*

2.2. Seven Capital's Student Accommodation Demand Assessment, submitted with the application, states on pg 8 that Islington already has 33 student accommodation buildings housing around 8,00 students and the highest numbers of student beds in London so it is clear that student accommodation is not an "*appropriate use of land*" in a borough with a critical need for conventional and affordable housing

2.3. This is also supported by the Planning Inspectorate report on Islington's Local Plan July 2023 Point 73. *We are also mindful that there is limited housing land supply in Islington and that conventional housing offers the most flexible accommodation over the long-term. Given this, the fact that Islington has the highest rates of student housing delivery in London over the past 10-15 years and that the rental market, including house shares and/or Houses in Multiple Occupation (HMO) can also contribute to housing for students, we consider that the prioritisation of conventional housing to be justified and Policy H6, as modified, strikes an appropriate balance*

2.4. Local Plan Site Allocation ARCH5: Archway Campus prioritizes conventional housing and affordable housing for the site and states that *An element of student housing may be acceptable as part of the development mix, provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant*

2.5. While the scheme delivers 242 student units it does not deliver the number and tenure of affordable housing number (as outlined in Affordable Housing section of this objection) and therefore does not comply to Local and London Plan policies.

3. Student housing reduces the overall affordable provision of the scheme to 22%

- 3.1. The inclusion of student housing into the scheme reduces the proportion of genuine social housing. Seven Capital themselves confirm *that the affordable housing equates to 22% by unit and 30% by habitable room.*

4. No offsite provision for the affordable student units

- 4.1. Seven Capital propose 79 units of 'social' student housing units will be provided off site however no detail is provided of where and how this will be done. They make an unsubstantiated claim in their Planning Statement that it's not possible to provide affordable accommodation onsite 8.16 *Whilst it is not proposed to provide affordable PBSA provision onsite, there are exceptional site-specific circumstances to justify this approach but do not explain why.*

5. Seven Capital have no nomination agreement with a higher education provider

- 5.1. London Plan policy H15 3) is breached as it sets out that student accommodation must *be secured through a nomination agreement for occupation by students of one or more higher education provider.* Seven Capital have no nomination agreement and furthermore they have not even verified demand from universities. Pg 3 of the Student Accommodation Demand Assessment states *"At this junction we have not explored potential interest for the site from universities in London but believe it would be of interest to a number of parties."*

6. Decreasing Overseas student numbers

- 6.1. In the Student Accommodation Demand Assessment Seven Capital explain that the accommodation is mostly suited to international students who would be charged £350 a week which is considerably more than London student maintenance grant of £13,348pa
- 6.2. Seven Capital argue that there is an unmet and increasing need for this type of student accommodation. However new data available from the Home Office shows that international student numbers have significantly decreased. There were 16% fewer visa applications from international students between July and September 2024 than in the same period in 2023 - with 263,400 sponsored study visa applications made between July and September 2024, down from 312,500 in the summer of 2023.

7. Risk that the student accommodation could be converted to office space or housing with no affordable housing provision and poor amenity space

- 7.1. With dwindling international student numbers there is a significant risk that should there be a lack of demand for the students units that Seven Capital could apply for planning permission for the studios to be converted to other uses.

7.2. We note that in the applicant's Design and Access Statement (DAS) pg 234 the student accommodation will have 3m floor to floor height which is much higher than required for student accommodation and the applicant confirms in DAS that this ceiling height "*provides sufficient clearance for most uses*" and they specifically mention housing and office space This would enable the building to be repurposed which would circumvent any affordable housing provision furthermore the applicant admits that providing external amenity space would be a challenge "*In the event of a transformation to more traditional housing typologies, the ability of the building to accommodate private external amenity space would need to be further interrogated*".

8. Developers are prioritising student housing to avoid paying the new Residential Developer Property Tax

8.1. Student accommodation will be exempt from this new tax which is levied at 4% of overall profits.

D) HERITAGE

1. Introduction

1.1. The JAG objects to the proposed application on the grounds of the damage it will cause to Heritage Assets. This objection is in two parts. The first covers damage to the setting of off-site Heritage Assets, and the second of damage to the Heritage Assets on the site.

1.2. The two sections of the JAG objection are dealt with separately below and cross referenced to the appropriate policies which are summarised as a separate objection.

2. Damage to the setting of Heritage Assets

2.1. Section 16 of the NPPF, Conserving and Enhancing the Historic Environment covers protection of the Heritage Assets and is supported by Policy HC1, Heritage, Conservation and Growth of Chapter 7 of the London Plan and Policies DH1 and DH2 of Chapter 8 Design and Heritage of Islington's Local Plan which also covers the designation of the site as a Conservation Area C41.

2.2. London Plan Policy HC3 of Chapter 7, entitled Strategic and Local Views covers protected views and includes in Table 7.1. Kenwood to Central London As will have been seen from the photo montages provided by the Heath and Hampstead Society in their objection to this application, -the Tower clearly impacts on this view and thus damages the protected view.

2.3. The proposed tower also interferes with strategic views of St Pauls Cathedral (Strategically Important Landmark in the London Plan) from Archway Rd and Archway Bridge and these views are protected in Islington's Local Plan policy DH2.

LV4: View from Archway Road to St. Paul's Cathedral

LV5: View from Archway Bridge to St. Paul's Cathedral

- 2.4. Historic England's The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2nd edition) sets out advice on understanding setting and how it might contribute to the significance of Heritage Assets. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of Heritage Assets.
- 2.5. The national planning policies, which were updated on 12th December 2024 are in place to protect our historic environment and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. We will list below the impact caused to designated Heritage Assets from the "most important" i.e. Grades 1 and 2* to the lower level of designated Heritage Assets.
- 2.6. Under clause 213 of the NPPF it is stated that "*Any harm to, or loss of, the significance of a designated heritage asset or from development within its setting should require clear and convincing justification*". It is under 213 (b) that the strongest protection exists. This states that "*protection of assets of the highest significance, notablygrade I and II* listed buildings, grade I and II* registered parks and gardens.....should be wholly exceptional.*"
- 2.7. Within the vicinity of the site there are a number of assets of Grade 1 and 2* whose setting will be negatively impacted by this development, in particular the student housing tower element of the development.
- 2.8. This feedback aligns with Policy HC1 of the London Plan which prioritises heritage conservation. This raises the threshold for approval, as approval would require Islington to justify how the project aligns with regional conservation priorities.
- 2.9. For evidence of the impact from various local points see the visualisations in the earlier Tall Buildings section of this document and further photo montages can be found here <https://bit.ly/archwaycampus24>.

3. Grade 1 and 2* Buildings, Parks and Gardens

- 3.1. Within the close neighbourhood of the application site are the following Grade 1 and 2* buildings, parks and gardens, the setting of which will be negatively impacted by the tower. The damage the tower will cause to these is in breach of NPPF 213 (b)
- 3.2. Grade 1 – Cromwell House Highgate Hill including frontage, currently owned by the Ghanaian High Commission. This is one of only two Grade 1 buildings within this area of north London.
- 3.3. Grade 1 – Highgate Western Cemetery Park and Garden. This is arguably the most famous cemetery in the world and the impact of the tower on this will be highly damaging. JAG understands an objection have submitted from the

cemetery and the Historic Buildings Parks and Gardens and fully support these objections.

- 3.4. Grade 2* The Egyptian Avenue and Lebanon Circle (inner and outer circle) of Highgate Cemetery. These are located in an elevated position in the cemetery and the tower will be clearly visible from here.
- 3.5. Grade 2* - Waterlow Park and Garden – this is the closest major green space to the site and currently enjoys a wooded southern perimeter uninterrupted by any close building intrusion. The tower would destroy this sylvan outlook.
- 3.6. Grade 2* - Ireton House and Lyndale House, 106, 106A, 108 Highgate Hill – these houses form an intact terrace on high ground above the tower. Again, their setting will be severely compromised by the intrusion of the tower
- 3.7. Grade 2* - The Church of St Joseph is situated on Highgate Hill at the junction with Dartmouth Park Hill on the fringes of Waterlow Park immediately to the north of the application site. It was built in 1887-9 by Albert Vicars in a Neo-Romanesque style and is significant for its patinated copper dome which is a clearly defined landmark visible from afar, in particular looking north from Holloway Road and Navigator Square. This landmark status will be destroyed by the tower.

4. Grade 2 Buildings and Structures

- 4.1. There are a number of Grade 2 buildings listed buildings within close proximity of the application site, the protection of which is covered by clause 213 (a) of the NPPF. Bearing in mind the number of exceptional buildings listed above it is not proposed to go into these in detail other than to notify of the significance of Archway Bridge and the views from here.

5. Locally Listed Properties

- 5.1. There are two significant locally listed buildings excluding those on the site, the setting of which will be harmed by the tower. These are the public house of Brendan the Navigator situated up Highgate Hill from the application site opposite St Joseph's Church and the Archway Tavern which is dealt with in more detail below.
- 5.2. The Archway Tavern is a Victorian public house with fine detailing situated in Navigator Square, immediately to the south of the application site. Although not statutorily listed it is locally listed in recognition of its status as a significant landmark within the area, strategically set at the head of the arterial Holloway Road. The building has a prominent clock tower with slated mansard roof, topped by a decorative cast iron ridge detail currently set against an open sky. Below this is a fine stone balustrade at parapet level. The new tower will sit immediately behind the Tavern and the developer's CGI's appears to show the tower growing out of the roof of the Tavern, thus destroying its important stand-alone status. This is plainly unacceptable

- 5.3. This is further reinforced by the Islington Local Plan - Chapter 2 Spatial Strategy under SP 7 Archway lists the Archway Tavern as a historic feature to be protected

6. Neighbouring Conservation Areas

- 6.1. The site is adjoined by a number of conservation areas so that effectively the whole surrounding area is a conservation area. These are dealt with below.
- 6.2. In elevated positions above the application site are Highgate Conservation Area (Camden) Highgate Conservation Area (Haringey), the Highgate and Hornsey Lane Conservation Area (Islington) and the Hampstead Conservation Area (Camden) which includes Hampstead Heath. These four conservation areas, all in different boroughs adjoin one another and are on the southern slopes of the Highgate ridge, directly to the north of the application site. They are directly affected by the development, in particular the tower, that will be highly visible from them all.
- 6.3. At the southern tip of the site and closely adjoining lies Islington's St John's Grove Conservation Area. The Local Plan under DH1 requires that *'...development will also need to conserve and enhance the significance of the St John's Grove Conservation Area (which lies at the southern tip of the site), including its setting.'*
- 6.4. Whitehall Park Conservation Area is also an Islington designated conservation Area and lies directly to the east of the application site on the other side of Archway Road. As with the other conservation areas mentioned above this too will be damaged by the tower.
- 6.5. Archway Park – although not a designated conservation area, this is an Islington park serving the local neighbourhood and is the closest open space. The tower looms over this.

7. Damage to on site Heritage Assets

- 7.1. Other sections of the JAG's objection elsewhere have dealt with the quality of the design, environmental factors, low level of affordable housing meeting local need, etc, This section will deal exclusively with the damage to the Holborn Union Infirmary Conservation Area.
- 7.2. The Archway Campus site was declared a conservation area by Islington in 2014 (CA41), prior to its sale by University of London and purchase by Peabody Ltd. According to Pevsner's Buildings of England: London 4: North (1998) the Holborn Union is: *"One of the most striking workhouse infirmaries and a landmark of this muddled junction. It is a large hospital on a narrow site, hence the towering brick wings, made bolder by tall water towers and widows rising into high dormers...."*
- 7.3. The Conservation Area Appraisal states that:

“The Holborn Union Infirmary Conservation Area is an area of special architectural and historic interest as outlined within the Conservation Area Statement. The Holborn Union Infirmary is of high architectural significance as a fine example of a substantial Gothic revival workhouse infirmary designed by the notable Victorian architect Henry Saxon Snell”

- 7.4. The purpose of declaring the application site a conservation area was to put in place policy which would protect the Heritage Asset from substantial alteration and demolition. The JAG does not believe that demolition nor substantial alterations of any of the buildings is justified by the developers declared enhancement of conservation area. It should also be noted that Policy HC1 of the London Plan requires developers to demonstrate that all feasible alternatives to demolition have been exhausted. This has not been demonstrated in this application.
- 7.5. The applicant’s plan produced by GRID and numbered PL0003 indicates the extent of the demolition and extensive alteration of historically significant structures (some very highly significant) and other drawings indicate the addition of incompatible architectural elements, including a dominant tower that would undermine the site’s historic character.
- 7.6. The Applicant’s Planning Statement point 5.18 reports that the GLA expressed concern over the loss of heritage buildings: *“...the demolition of some of the existing locally listed buildings and the proposed tall building are likely to cause substantial harm to the significance of the site’s heritage assets, which must be addressed, alongside any other harm.”*
- 7.7. Whilst the site is included in Historic England’s Buildings at risk register, the developer states in the planning statement that returning the building to active use will reverse deterioration of a heritage site. The problem is that, if the Applicant’s scheme is approved, substantial elements the Heritage Asset will be destroyed or severely damaged. The damage is detailed further below related to part of the site

8. Holborn Union Infirmary Building

- 8.1. The main range, built in c1879 (the Holborn Building), along with the north wing, the (the Charterhouse Building), and the south wing, (the Clerkenwell Building) is described in the Conservation Area Appraisal as being of very high significance. The group is a fine example of a substantial Gothic revival workhouse infirmary designed by the notable Victorian architect Henry Saxon Snell.
- 8.2. This section of the development will house the private “for sale” element of the development. The works include gutting the main infirmary building, adding floors in the roof, the insertion of two rows of windows into the roof. and demolishing almost everything else. It is hard to see how this could be approved, bearing in mind the importance of this building. The ‘wings’ to the main building are described as featuring a lack of historic fabric. This is not only arguably not the case, but the proposed new build replacements fail to

achieve the texture and quality of the original building being little more than partial façade retention.

- 8.3. The significance of the conservation area will be severely damaged by the destruction of the main roof, by the gutting of the main building, the addition of windows to its impressive slate roof, replacement of the existing tower louvres with glazing, and removal of other remaining historic features.
- 8.4. The infirmary's high historic significance is as a largely intact Victorian workhouse infirmary building. It is also of great historical significance making up the original infirmary based on designs by Florence Nightingale' using an innovative pavilion plan form. Its design, uniquely, features both the traditional square wards, inherited from workhouse tradition, as well as the new Nightingale wards with separate wings accessed via corridors and designed to reduce the spread of disease, thought to be airborne. Photographs show that original cast iron pillars survive next to temporary walls and polystyrene ceiling tiles, as do attractive spaces with gothic revival detailing and attractive openings
- 8.5. The proposals completely ignore the significance of the interior of the building, suggesting that any assessment has in fact been superficial and cursory. There is no reason why an innovative design could preserve incorporate these original features.
- 8.6. The conservation area is listed on Historic England's Heritage at Risk Register (HAR) and Historic England, we understand, has recently carried out a further assessment of the site in the light of the current proposals.
- 8.7. The proposed Charterhouse entrance as shown in the Heritage Design and Access Statement is not a reinstatement of a historic feature as claimed as its derived from Romansque not the Gothic Revival Style used by Saxon Snell – it is therefore inappropriate

9. The Nurses Accommodation

- 9.1. The Nurses' Accommodation consists of blocks attached to and running south at right angles to the Clerkenwell Building, the south wing of the main infirmary building. This was built a year or two after the original building and should be judged as an integral part of it. It is three storeys purpose built nurses' accommodation building, following the style, materials and proportions of the main range. As such, although not specifically identified, it is within the Conservation Area which specifies the importance of retaining all the older buildings on site, and is a considerable contributor to the overall integrity of the original development and thus the Conservation Area.
- 9.2. This part of the original structure is scheduled for complete demolition to create a cleared site for the construction of the 27 storey student housing tower and the 2 storey adjacent admin building.
- 9.3. The JAG has objected strongly to the construction of the tower elsewhere in this objection. The reasons for objection to the tower are on the grounds of

the numerous breaches of policy including the impact on heritage assets, Islington's tall buildings policy, Islington's guidance on student housing , as well as the environmental damage the tall tower would cause to Navigator Square and the surrounding area as well as the lower end of the application site through wind blight and overshadowing.

9.4. Bearing this in mind. there is no way that it could be argued that the replacement buildings would enhance the site and therefore the demolition cannot be justified under the protected Conservation Area status of the Nurses Home

9.5. It should also be noted that the applicant's Affordable Housing Statement indicates that the discounted market rent accommodation could be used to accommodate staff from the nearby Whittington Hospital. The Nurses Homes is already purpose built accommodation which could be retrofitted and repurposed to meet current standards and regulations

10. The Staples Building

10.1. This consists of the remnants of what was the original workshops and comprise of a single-storey brick built range with a pitched roof, hipped at the eastern end and various gabled elements with a projecting section. The Staples Building is noted as being of high significance within the Conservation Area Appraisal.

10.02. It was built as part of the original design in c.1879 and is now all that remains of the original workshops and laundry buildings, as the other parts were demolished to make way for the Furnival Building. Various inappropriate alterations have been made to the building, which now has windows which have been largely replaced and comprise of a mixture of uPVC and timber framed, as well as some blocked openings. Many openings have been enlarged or otherwise altered.

10.03. Bearing in mind that this is being demolished to accommodate Block A which is having a extremely negative effect on the amenity of the adjoining residents in the Academy Building and Lidyard Road, it is difficult to justify its demolition in terms of the enhancement of the Conservation area.

10.04. In the developer's Option B scheme, the Staples Building was shown as being retained, thus preserving the amenity of the adjoining residents as well as retaining what is deemed in the Conservation Area Appraisal to be a highly significant building.

10.05. It should be noted as above other parts of the workshops and laundry were demolished in the 1970's to accommodate the construction of the Furnival Building. This is a concrete framed eight storey building in a sub Brutalist style, a style long unfashionable but now being recognised for its robust architectural statements.

10.06. Regardless of the pros and cons of the architectural style, the Furnival Building was shown as retained in the developer's Option B scheme, but in

Option A was demolished to accommodate Blocks A and B. The building could easily be retrofitted which would have huge benefits in terms of embodied energy.

10.07. The inclusion of a retrofitted Furnival Building in Option B does indicate that the developer has accepted the feasibility of this and, as above, for the Staple Building. The removal of Block A would have a hugely improved impact on the amenity of the adjoining residents in the Academy Building and Lidyard Road. In view of the potential for larger spaces, the Furnival Building could also be a suitable location for on site community facilities.

11. Boundary Treatment

11.01. The Character Appraisal rates the boundary treatment as of high significance for the good reason that it is a key feature of the whole Conservation Area and how it integrates with its surroundings.

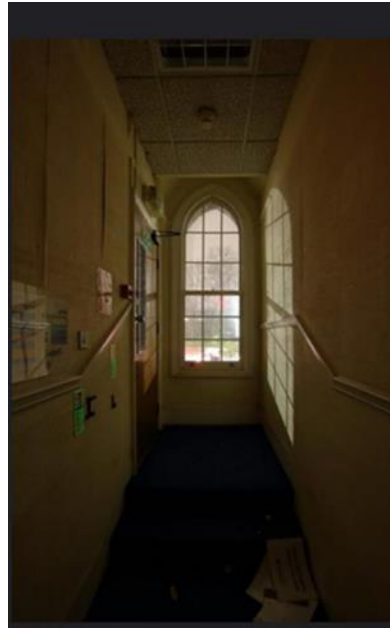
11.02. The Islington Urban Design Guide and BRE Guidelines recognise the importance of maintaining environmental quality around heritage assets to uphold their usability and appeal.

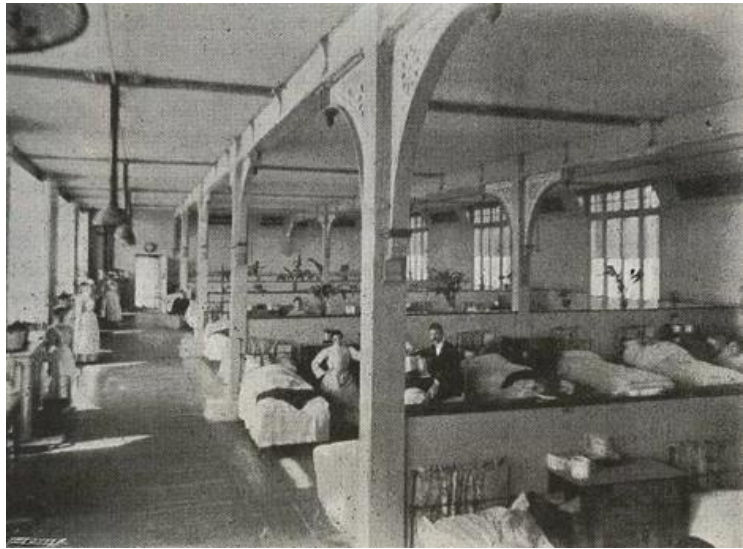
11.03. The application includes the proposal to alter original boundary walls and other historic landscaping elements to improve site access and visibility. This would disrupt the original design that defines the site's character as the boundary walls and mature trees are historically significant, framing the Infirmary in its original context

11.04 . The applicant is relying on policy which states that there should be 'active frontages'. There are no shopfronts and little 'active' overseeing of Highgate Hill from the flats. These conflicting requirements are far from resolved in the extremely narrow view of the Holborn Union main building which is restricted to one view and only of the central tower from Highgate Hill. The proposal loses sight of the importance and significance of these buildings to the Archway/Highgate area. See 'F Open Space'.

11.05 The distinctive original boundary wall topped with railings survives to most of the site boundary. A section which begins at the prefabricated temporary buildings and ends on the corner of Highgate Hill with Tollhouse Way has been set back and replaced with a poor quality and unattractive section of concrete. These detract from the significance of the original boundary treatment and should be replaced to match existing.

Photos taken from inside the Holborn Union Infirmary Building showing historic features

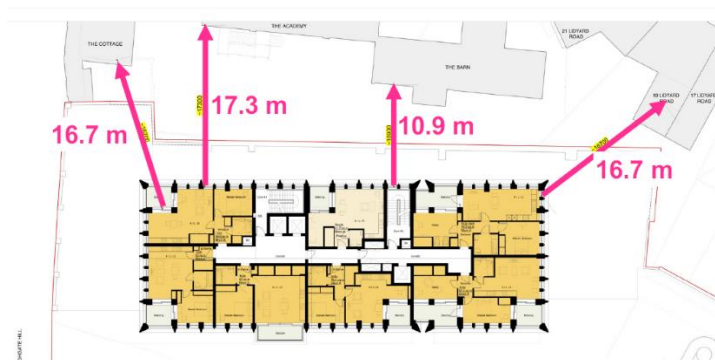


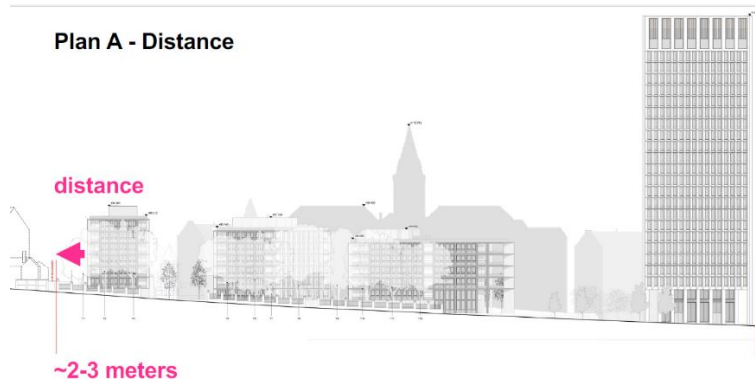


E) IMPACT ON NEIGHBOURS

- 1.1. The proposed scheme would result in a significant reduction in levels of daylight for Lidyard Road, Despard Road and The Academy.
- 1.2. Properties along Lidyard and Despard Roads would also experience decreases in their Vertical Sky Component and N-Sky Line values, with reductions exceeding the 20% threshold outlined in BRE guidance
- 1.3. The applicant's daylight report acknowledges that certain units and areas within the development do not even meet BRE daylight standards.
- 1.4. The development proposals include multiple upper floor balconies and windows in Block A directly facing neighbouring properties in Lidyard Road, Despard Road and The Academy. Balconies in particular would allow significant visual intrusion into adjacent homes and gardens which are integral to residents' enjoyment and privacy as well as generating intrusive noise when they are used and when windows are open.
- 1.5. While distances between properties within the development respect the guidance 18-21 metres apart, distance from the new buildings to neighbours outside the scheme range from 17.3 right down to 10.9 metres between Block A and properties on Lidyard Road - see plan below. In some cases the proposed buildings are 2 metres from property boundaries

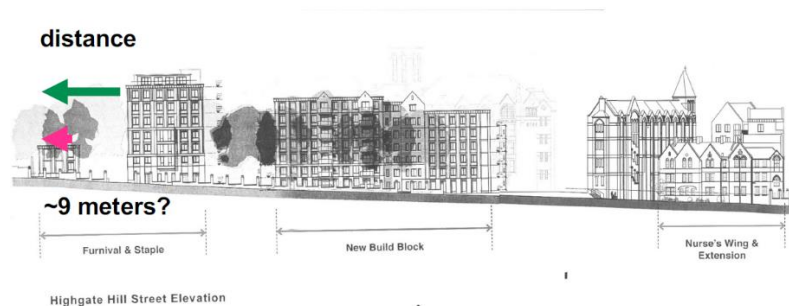
Plan A - Distance (guidance is minimum 18 - 21 m)





1.6. The Plan B alternative which would retain and convert the existing Staples Building which would greatly reduce the impact on neighbours in terms of overlooking and loss of daylight.

Plan B - Distance



F) OPEN SPACE

- 1.1. The Conservation Area Statement (CAS) for the Holborn Union Infirmary clearly sets out the importance of open space in Point 5 The open space, gardens and trees are all deemed to be of *high significance* and the impact of the proposed development on open space would be highly damaging.
- 1.2. The scheme would provide some open space but of low quality given it is largely paved, heavily overshadowed and particularly at the end closest to Archway centre would be significantly affected by wind blight from the tower.
- 1.3. The proposed scheme does not provide anywhere near the required amount of play space as set out in the London Plan S4. 653.6sqm is provided which is significantly less than the required 933sqm and relies on access to play space outside the site
- 1.4. No play space is provided at all for children 12+ years which is in breach of London Plan Policy S4 2 and Local Plan SC2 C.
- 1.5. Furthermore the very thin strip of proposed door step play wedged between Block A and the boundary to The Academy is risible. It is right at the edge of

the site with a high boundary wall to one side and a 7 storey block to the other. It will get very little light as its north west facing with the Block A behind it. The applicant's shadowing analysis confirms that only 12% of the space would receive 2 hours of direct sunlight

- well below the acceptable levels and no doubt explains why there is no greenery.

- 1.6. Furthermore doorstep play should include play features but the space is too narrow for any decent play features provision.
- 1.7. And only 38% the two 5 – 11 year old play spaces to east of Block A would receive 2 hours of direct sunlight.
- 1.8. Together with the door step play this is very low quality play provision breaches London Plan Policy S4 which requires play space to provide a stimulating environment and incorporate greenery.

G) BIODIVERSITY

- 1.1. This application breaches the mandatory requirement for a 10% Biodiversity Net Gain (BNG) in Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) as only 8.54% BNG can be achieved as stated in the Biodiversity Net Gain Assessment. This is in breach of NPPF policies 192d and London Plan policy G6D
- 1.2. The proposed off-site off setting is not acceptable given the size of the site and not in line with the London Plan Policy G6 and Islington Local Plan Policy G4.
- 1.3. The applicant has treated the green roofs as a tick box exercise with no details provided on the proposed green roofs in accompanying Landscape Statement other than their inclusion in a diagram pg 14. Until a planting plan is submitted with robust information on how these green roofs can survive given the over shadowing and wind blight from the tower, the council should not accept the applicant's inclusion of green roofs in their UGF Residential Target.

Concluding remarks

For the reasons set out herein, the Council is bound to refuse the application.

Indeed, the application is bound to be refused on the basis of each of the policy breaches and other relevant planning considerations cited herein alone without having to rely solely upon the overwhelming cumulative nature of the breaches and the other relevant planning considerations which militate against approval.

APPENDIX 1 – POLICIES BREACHED

A) AFFORDABLE HOUSING

London Plan

Policy D6 Housing quality and standards

3.6.5 Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and therefore should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur, should be avoided. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive mechanical cooling systems

Islington Local Plan

Policy H1: Thriving communities

B. All new housing must contribute to the delivery of the Local Plan vision and objectives, making the borough a fairer place through the delivery of the right type of housing that meets identified needs.

F. The affordable housing tenure split on all schemes must prioritise forms of affordable housing which is genuinely affordable for those in need, particularly social rented housing. Further detail on this policy approach is set out in Policy H3.

J. The size mix of new housing must reflect local need, with priority for units suitable for families. Further detail on this policy approach is set out in Policy H2.

Policy H2: New and existing conventional housing

D. All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2.

E. Concentrations of one-bedroom units – overall and as part of constituent market and affordable elements of a proposal – will not be acceptable.

Policy H3: Genuinely affordable housing

A. A minimum of 50% of the total net additional conventional housing built in the borough over the plan period must be genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and not be counted towards the level of affordable housing provision on individual schemes.

J. Where affordable housing is provided on-site, the Council will require an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should be London Living Rent, and regard will be given to the priorities set out in the Council's Housing Strategy and other agreed evidence of housing need.

B) STUDENT HOUSING

London Plan

Policy H15 Purpose-built student accommodation

A) Boroughs should seek to ensure that local and strategic need for purpose built student accommodation is addressed, provided that:

3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider

c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.

Islington Local Plan

Policy H1: Thriving communities

M) The provision of additional student accommodation will be restricted to allocated sites or sites in existing use as purpose built student accommodation or where there is a wider master-planned approach to consolidate and reconfigure educational floorspace on a university campus. Any proposals for student accommodation will be expected to provide affordable student accommodation. Further detail on this policy approach is set out in Policy H6.

C) TALL BUILDINGS

London Plan

Chapter 3 Design D9 B

3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

D9C

Development proposals should address the following impacts:

1) visual impacts

a) the views of buildings from different distances:

i) long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii) mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii) immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

C3. environmental impact a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

Islington Local Plan

Building Heights DH3

B Buildings of more than 30 metres are only acceptable in-principle:

- (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or*
- (ii) within specific sites identified in a Spatial Strategy area.*

E. Tall buildings must be high quality in accordance with Policy PLAN1. The designs of tall buildings must consider the individual and cumulative visual, functional, and environmental impacts, avoid negative impacts through good design, and mitigate any remaining negative impacts as far as possible. The following criteria must be fully satisfied:

(iii) Conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective

significance (including in neighbouring boroughs where impacted);

(iv) Be proportionate and compatible to their surroundings and the character of the area;

(v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or Spatial Strategy area policy, and other relevant design policies;

(vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;

(xii) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work

D) HERITAGE

NPPF

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary...

208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. **Substantial harm to or loss of:**

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;**

London Plan

Policy HC1 Heritage conservation and growth

A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B. Development Plans and strategies should demonstrate a clear understanding

of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.

Policy HC3 Strategic and Local Views

A. Strategic Views include significant buildings, urban landscapes or riverscapes

that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

D9 C Impacts

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

Islington Local Plan

Policy DH1

Fostering innovation and conserving and enhancing the historic environment states:

A. Islington supports innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.

B... Development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design and heritage.

Policy DH2

Heritage assets

A. Planning and listed building consent applications must include a Heritage Statement which demonstrates a clear understanding of the significance of any heritage assets affected by the proposals, including any contribution to significance made by their setting; and assesses the potential impact on

significance arising from the proposals. Heritage Statements must be informed by specialist heritage advice and must include sufficient information to allow full assessment of development proposals.

Conservation areas

B. Development within conservation areas and their settings – including alterations to

existing buildings and new development - must conserve or enhance the significance of the area, and must be of a high quality contextual design.

Proposals

that harm the significance of a conservation area must provide clear and convincing

justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.

C. Buildings, spaces, street patterns, views and vistas, uses and trees which contribute to the significance of a conservation area must be retained. The significance of a conservation area can be harmed over time by the cumulative impact arising from the loss of these elements which may individually make a limited positive contribution, but cumulatively have a greater positive contribution.

Listed buildings

D. Proposals that harm the significance of a listed building (through inappropriate

repair, alteration, extension, demolition and/or development within its setting) must

provide clear and convincing justification for the harm. Substantial harm to, or loss

of, a listed building will be strongly resisted.

Non-designated heritage assets

I. Non-designated heritage assets, including locally listed buildings and shopfronts,

must be identified early in the design process for any development proposal which

may impact on their significance. The Council will encourage the retention, repair

and re-use of non-designated heritage assets. Proposals that unjustifiably harm

the significance of a non-designated heritage asset or their setting will generally

not be permitted.

8.17 The Council will not permit substantial harm to (or total loss of significance of) a designated heritage asset unless it can be demonstrated that the substantial harm or total loss is necessary to fully address all other relevant Local Plan policy requirements including, inter alia, affordable housing, affordable workspace, inclusive design and sustainability standards;

or where the following criteria is met in full: • The nature of the heritage asset prevents all reasonable uses of the site; • No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; • Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use

SP7 – Archway

C. Archway Tavern is a historic feature and a focal point of the Town Centre...

Holborn Union Infirmary (CA41) Conservation Area Statement

12. Conservation is about making sure that any future change conserves or enhances the character and appearance of the conservation area. To achieve this, the council uses its planning powers to manage change in a careful and sensitive manner.

76. The original infirmary building has high historic significance as a largely intact Victorian workhouse infirmary building. Its design follows the 'Nightingale ward' plan form with its separate wings accessed via corridors, designed to reduce the spread of disease – thought to be airborne.

Boundary treatment – high significance

98. The Holborn Union Infirmary heritage assets have a great deal of aesthetic value as a distinctive high quality landmark building with the central tower visible from miles around.

E) IMPACT ON NEIGHBOURS

Islington Local Plan

Policy PLAN1: Site appraisal, design principles and process

1.67 ... For development to be considered acceptable, it must be:

o ensuring a minimum distance of 18 metres between windows of habitable rooms, to protect privacy for residential developments and existing residential properties. This does not apply across the public highway, as overlooking across a public highway does not constitute an unacceptable loss of privacy.
o assessment of daylight and sunlight to ensure that there is sufficient levels of sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. Further guidance is provided in the Building Research Establishment (BRE) publication 'Site Layout Planning for Daylight and Sunlight: a guide to good practice'.

Policy H4: Delivering high quality housing

H. Residential development, ... must consider the effect on the amenity of adjacent properties, and put in place measures to address any adverse effects raised.

Site Allocation

CH5: Archway Campus

Development Considerations: *Any development should respect the amenity of neighbouring residential properties, including properties on Lidyard Road.*

F) OPEN SPACE

London Plan

S4 Play and informal recreation

2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:

- a) provides a stimulating environment*
- c) forms an integral part of the surrounding neighbourhood*
- d) incorporates trees and/or other forms of greenery*

Local Plan

Policy SC2: Play space

C. All major residential development must make appropriate on-site provision for free to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities. Provision must be proportionate to the anticipated increase in child population as a result of development proposals. All proposed provision of new play space within development sites must be designed in partnership with Islington Council, in line with any relevant best practice standards.

Holborn Union Infirmary (CA41) Conservation Area Statement

90. Open spaces within the site are important as they provide an appropriate setting to the significant historic buildings and allow them to be viewed and appreciated

G) BIODIVERSITY

NPPF

192d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

London Plan

G6 Biodiversity and Access to Nature

D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Local Plan

G4 : Biodiversity, landscape design and trees

A. All developments must protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting and enhancing connectivity between habitats

C(iv). Maximising biodiversity benefits and ecological connectivity, including through the protection and enhancement of existing biodiversity, and the incorporation of new areas of biodiversity and opportunities for wildlife, including green roofs and vertical greening. Development proposals must aim to secure a net gain in biodiversity value, with a clear priority for on-site measures;

D. All developments must protect and enhance site biodiversity, including wildlife habitats, trees and measures to reduce deficiencies in access to nature. Developments involving refurbishment and/or extension of existing buildings must be designed and implemented to reduce impact on existing species and their habitats