# ARCHWAY CAMPUS
# JOINT ACTION GROUP CONSULTATION RESPONSE

Revised objection – October 2026

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

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

## Executive Summary – The Case for Refusal

JAG supports the redevelopment of Archway Campus and substantial new housing on this highly accessible brownfield site, together with an appropriate element of student accommodation. **Our objection is not to redevelopment, but to a scheme which combines an 82-metre, 27-storey student tower on a site not identified for tall buildings with a substantially weakened housing offer, the retention of all 242 Purpose Built Student Accommodation (PBSA) rooms and continuing heritage and townscape harm**.

- **The 27-storey tower conflicts with the plan-led approach to tall buildings.** At approximately 82 metres, it would stand on a site that was considered through the Local Plan process but was not identified as suitable for a tall building. It would also be substantially taller than the maximum heights identified at the three designated tall-building locations elsewhere in Archway.
- **The revised scheme delivers a substantially weaker housing offer.** Homes have fallen from **178 to 167**, while affordable homes have fallen from **91 to 39 - 52 fewer, a reduction of 57%**. All 39 remaining affordable homes would be Social Rent, which JAG welcomes, but all **242 PBSA bedrooms remain unchanged**.
- **The housing mix does not adequately reflect ARCH5's priority for conventional housing.** Nearly **70% of the 167 homes would be one or two bedroom properties**, while the number of affordable family-sized homes increases by only one, from **11 to 12**.
- **All 242 PBSA bedrooms remain despite important policy conflicts.** ARCH5 prioritises conventional housing, while the applicant acknowledges non-compliance with the nomination and affordable-PBSA requirements. **Those shortcomings are also relevant to whether the C3 housing can benefit from the emergency 20% affordable-housing route, which expressly requires the relevant London Plan PBSA requirements to be met.**
- **The 27-storey tower would cause significant heritage and townscape harm.** Historic England remains **"deeply concerned"** and says impacts on the Holborn Union Infirmary Conservation Area remain **"considerable and harmful"**. Harm also extends to important heritage assets and views, including Grade II* Waterlow Park, Grade I registered Highgate Cemetery and protected views towards St Paul's.

- **The applicant has not demonstrated that an 82-metre tower is necessary to redevelop the Campus.** The applicant has previously explored a materially lower-rise configuration providing substantial housing and student accommodation. JAG does not present that scheme as a proven viable alternative, but it demonstrates that substantial redevelopment does not physically depend on the present 27-storey form.

The changed housing delivery context and the revised 2026 NPPF add substantial weight to bringing this highly accessible brownfield site back into productive use and delivering new homes. JAG supports those objectives. **The applicant does not, however, establish that redevelopment requires this particular development model**, nor do they displace the Development Plan's approach to tall buildings, ARCH5's priority for conventional housing, the PBSA policy requirements or the need to give appropriate weight to the identified heritage and townscape harm.

## 1. Introduction

This response addresses the applicant's September 2026 revisions to the Archway Campus application. **JAG maintains its earlier representations except where expressly updated below.**

The Mayor must determine the revised application in accordance with the statutory Development Plan – comprising the adopted London Plan and Islington's adopted development plan documents – unless material considerations indicate otherwise.

The September revisions leave the principal elements of the scheme substantially unchanged: **the 27-storey, 82-metre student tower and all 242 PBSA bedrooms remain.** At the same time, the number of homes has fallen from **178 to 167** and affordable homes from **91 to 39**, while market homes have increased from 87 to 128. The applicant also acknowledges continued **non-compliance with the PBSA nomination-agreement and affordable-PBSA requirements**, while the seriousl heritage and townscape concerns associated with the tower remain.

**JAG also submits with this response a separate Visual Evidence Addendum**, which examines the applicant's visualisations and provides comparative evidence from a range of viewpoints around the site. **It raises significant concerns as to whether the applicant's submitted images adequately represent the likely scale, prominence and visibility of the 82-metre tower.** The Addendum forms part of JAG's objection and is considered further in Section 13.

The following sections explain why the revisions do not overcome Islington's reasons for refusal or provide sufficient justification for the proposal's conflicts with the Development Plan.

## 2. The 27-storey tower conflicts with London's plan-led approach to tall buildings

**This is a fundamental objection, not simply a question of architectural preference.**

London Plan Policy D9 establishes a deliberately plan-led approach to tall buildings. Boroughs are required to determine whether and where tall buildings may be appropriate, identify those locations and appropriate heights in their Development Plans, and Policy D9 B(3) states:

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

**Archway Campus is not identified as such a location.**

The applicant's revised Design and Access Statement section 7.8 acknowledges the potential policy departure:

“While the height of the proposed Student Accommodation building may be seen as a departure from local guidance, it is fervently argued that its slender and singular form and the consequent benefits at ground level outweigh any harm caused to its immediate surroundings.”

Policy D9 B(3) is not an absolute legal prohibition, and the Mayor may grant permission contrary to an individual Development Plan policy where material considerations justify that course when the Development Plan is considered as a whole. The issue is therefore whether the benefits relied upon are sufficient to justify the locational conflict and the associated townscape and heritage harm. JAG considers that they are not.

The July 2026 Draft London Plan materially reinforces this plan-led direction of travel. Draft Policy MBUL3 requires plan-making authorities to identify locations that may be appropriate for buildings of 30 metres and above, **define the boundaries of those locations and set appropriate or maximum heights**. For development management, it states that tall buildings should be directed to locations identified in the Local Plan as appropriate in principle **for buildings of that height**.

Where a tall building is proposed outside an identified location, MBUL3 requires specified locational criteria to be considered in determining whether the location is acceptable in height terms and expects robust justification for any conflict with those criteria. Those criteria include whether the location has very good sustainable transport connectivity and whether it is unduly sensitive to tall buildings of the scale proposed. The Draft Plan also states that isolated tall buildings should only be considered where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context, or replace an existing tall building.

While the July 2026 Draft London Plan is emerging its approach nevertheless reinforces the direction of the adopted plan: **the location and appropriate height of tall buildings should principally be determined through the plan-making process rather than on an ad hoc application-by-application basis.**

# 3. Archway Campus is not an identified site for a tall building

## 3.1 The adopted Local Plan identifies specific locations for tall buildings

Islington's adopted Local Plan takes a location-specific approach to tall buildings. Policy DH3 identifies particular sites where buildings above 30 metres may be acceptable, subject to specified maximum heights.

Paragraph 8.48 explains that the identified sites were informed by a detailed local urban design assessment which considered matters including public transport accessibility, topography, conservation areas, listed buildings, protected vistas and strategic views in order to identify areas unsuitable for buildings over 30 metres.

Within the Archway Spatial Strategy area, only three locations are identified:

- A1 – Hill House: maximum 52 metres / 17 storeys
- A2 – Vorley Road Bus Station: 40–46 metres / 13–15 storeys
- A3 – southern end of Macdonald Road: maximum 37 metres / 12 storeys

The Local Plan makes clear that the maximum height in metres takes precedence over the indicative number of storeys.

**Archway Campus is not one of these identified locations.**

The application site is covered instead by Site Allocation ARCH5 - Archway Campus, Highgate Hill, which contains no equivalent provision for a tall building.

The distinction can be seen particularly clearly by comparison with ARCH1 - Vorley Road/Archway Bus Station, which encompasses the A2 tall-building location and expressly provides for the potential for a local landmark building of up to 15 storeys (46 metres).

**Where the Council considered additional height appropriate, it identified the location and defined its extent. It did not do so at Archway Campus.**

## 3.2 A tall building at Archway Campus was considered during preparation of the Local Plan

**The absence of a tall-building designation at ARCH5 cannot reasonably be treated as an oversight.**

During preparation of the Local Plan, the then landowner, Peabody, sought greater flexibility for tall buildings at Archway Campus. In its Regulation 19 representations (R19.0178), Peabody referred to emerging proposals including an “Apex” building of 14 and 7 storeys and sought amendments which

would allow tall buildings to be considered on a site-by-site basis elsewhere within the Archway Spatial Strategy area.

The Council rejected that proposed policy approach, stating that “Pre-app proposals are not evidence of suitability of a tall building” and that the proposed amended wording “would undermine the approach to tall buildings in the Local Plan”.

Peabody also specifically requested that ARCH5 be amended to state that a tall building could potentially be acceptable on the Campus. The Council responded that “The site is not identified as suitable for a tall building in the Tall Buildings Study”, while noting that any application for a taller building would be assessed on its individual merits under Policy DH3. *(Sources: Islington Council, Regulation 19 Consultation Responses, R19.0178 Peabody, responses on Policy DH3, Policy SP7 and Site Allocation ARCH5, Site Allocations Topic Paper, February 2020, paras 4.12–4.13.)*

**The significance is that the possibility of a tall building at Archway Campus was expressly raised during plan preparation, but the site was nevertheless not identified as a tall-building location in the adopted spatial strategy.**

## 3.3 The proposed tower goes far beyond the heights identified elsewhere in Archway

The revised application retains a tower of **27 storeys and approximately 82 metres**.

It is therefore not simply a tall building on a site which has not been identified for one; it is substantially taller than the maximum heights identified for the three potentially suitable tall-building locations elsewhere in Archway.

| Location | Adopted maximum | Proposed Archway Campus tower |
|---|---|---|
| A1 – Hill House | 52m / 17 storeys | 82m / 27 storeys |
| A2 – Vorley Road Bus Station | 40–46m / 13–15 storeys | 82m / 27 storeys |
| A3 – southern Macdonald Road | 37m / 12 storeys | 82m / 27 storeys |

The proposed tower would therefore be approximately 30 metres higher than the maximum height at A1, the tallest of the three locations identified in the adopted Plan, and approximately 36 metres higher than the upper limit at A2, the identified tall-building location closest to the Campus.

**The scale of the departure is therefore substantial** and is material to the weight which should be given to the conflict with the adopted spatial strategy.

## 3.4 Proximity to an identified tall-building location does not make ARCH5 part of that location

JAG recognises that Archway Campus lies close to the existing Archway cluster and to A2/Vorley Road. However, proximity to a location identified for tall buildings is not equivalent to being within that location.

**The purpose of identifying particular locations through the Local Plan process is to establish where tall buildings may be appropriate and, equally importantly, where they are not.** If the boundaries of locations identified through the Local Plan could effectively be extended to adjoining sites through individual development management decisions, the purpose of defining those locations through the plan making process would be weakened.

That is particularly relevant here because the proposal is not for a building comparable in height with nearby A2. **At approximately 82 metres, the tower would be around 36 metres higher than A2's 46-metre maximum.**

**The proposal therefore cannot reasonably be characterised as a modest extension of the established Archway tall-building cluster.**

## 3.5 The conflict is both locational and one of scale

**The issue is not whether the Campus should be developed, but whether the benefits of this particular scheme justify an 82-metre tower on a site which was considered through the Local Plan process but was not identified as suitable for a tall building.**

The conflict is also not solely about location. At 82 metres and 27 storeys, the tower would substantially exceed the heights identified at A1, A2 and A3 and would create an abrupt transition to the lower-rise streets and historic areas to the north and west.

**Policy DH3 Part E of Islington's Local Plan also requires tall buildings to fully satisfy a detailed series of criteria addressing their individual and cumulative visual, functional and environmental impacts.** Among other matters, tall buildings must be proportionate and compatible with their surroundings; protect or enhance strategic and local views; conserve heritage assets and their settings; promote exceptional design; contribute positively to the skyline; provide an appropriate transition to lower surrounding development; and protect the settings of local landmarks.

JAG considers that the proposal conflicts with these requirements in several fundamental respects. JAG recognises that Archway already contains a cluster of taller buildings. The objection is therefore not to height in Archway in principle, but to the exceptional height and scale proposed on this particular site. At 82 metres, the tower would be substantially taller than the existing Archway cluster as well as the maximum heights identified at A1, A2 and A3, and would create an abrupt transition towards the substantially lower-rise residential streets and historic areas to the north and west. The applicant describes the tower as having a "slender and singular form". JAG does not agree that this amounts to exceptional design in its particular context. In our view, **the tower's exceptional and incongruous height and resulting prominence detract from any architectural merits of its form.** Its "singular" character reflects the extent to which it would stand apart from its surroundings and assert itself on the skyline The townscape, strategic and local view and heritage evidence demonstrates harmful impacts on the skyline, important views, conservation areas and the settings of heritage assets. These are therefore not simply consequences of the tower's height: they engage the detailed requirements of adopted Policy DH3 itself.

The applicant's Design and Access Statement argues that the tower's slenderness, "singular form" and ground-level benefits outweigh the harm. **JAG strongly disagrees. At 82 metres and 27 storeys, the tower's "singular" character is not in itself a design benefit: it reflects the extent to which the building would stand apart from its surroundings and assert itself on the skyline. Its slenderness does not diminish its exceptional height, prominence or the abrupt transition to the substantially lower-rise streets and historic areas to the north and west.** Ground-level benefits are welcomed, but they do not remove the locational conflict or overcome the conflicts with the detailed requirements of Policy DH3.

The Mayor is determining the called in application as local planning authority, and the statutory starting point remains the Development Plan. The benefits of the scheme must therefore be weighed against this departure from the adopted tall-building strategy and the identified conflicts with Policy DH3.

**The September amendments do not resolve those conflicts: the 27-storey tower remains. JAG considers that its location and exceptional scale continue to weigh substantially against the proposal.**

Archway's excellent public-transport accessibility supports substantial development of the Campus and is an important benefit of redevelopment. **However, accessibility was expressly among the considerations informing the assessment of appropriate tall-building locations under the Local Plan.** It does not, therefore, establish that an 82-metre, 27-storey tower is necessary or appropriate on ARCH5. Accessibility is one consideration in the planning balance; it does not displace the adopted tall-building strategy or overcome the heritage and townscape impacts identified elsewhere in this response.

## 4. The revisions move further away from ARCH5's priority for "conventional housing"

JAG's concern is that this site is not being used is to optimise the provision of conventional housing as set down under national policy, where the 2026 NPPF, Policy HO7 states that "substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community".

Furthermore, ARCH5 is unusually explicit about the priorities for this particular site. Given Islington's very limited supply of development land, it states that policies **"strongly prioritise the most urgent need, which is conventional housing."** It allows **"an element of student housing"** only where **"the quantum of student accommodation must not weigh against the provision of priority conventional housing on the site"** and **"must ensure that the development can achieve a fully policy compliant quantum and tenure of affordable housing."**

Islington's **2025 Housing Delivery Test result of 69%** reinforces the importance of making effective use of this site for housing. It does not, however, displace ARCH5's site specific priorities. **The revised scheme does not comply with those priorities.** It retains all 242 PBSA bedrooms while reducing conventional housing from 178 to 167 homes and affordable housing from 91 to 39 homes. This conflicts with ARCH5's express requirements that the quantum of student accommodation **"must not weigh against the provision of priority conventional housing"** and **"must ensure that the development can achieve a fully policy compliant quantum and tenure of affordable housing."** *(Source: MHCLG, Housing Delivery Test: 2025 measurement, August 2026.)*

| Key housing component | Original application | Revised scheme | Change |
|---|---|---|---|
| Homes | 178 | 167 | -11 |
| Affordable homes | 91 | 39 | -52 (-57%) |
| Market homes | 87 | 128 | +41 |
| PBSA bedspaces | 242 | 242 | No change |

**The September revisions move the scheme materially further away from those priorities.**

**Furthermore, including the student housing and calculating in numbers of units, the development will deliver 409 homes on the site However, when calculating the overall number of units on the site, out of 409 units less than 10% will be affordable.**

**This goes to the heart of ARCH5.** The component which the allocation identifies as Islington's **"most urgent need"** has been reduced, while the student accommodation which ARCH5 permits only conditionally has been retained in full. The revised scheme must therefore be assessed against both of ARCH5's safeguards: whether the scale of PBSA weighs against the provision of priority conventional housing, and whether it enables the development to achieve fully policy-compliant affordable housing. **The substantial reduction in both conventional and affordable housing, while all 242 PBSA bedrooms are retained, weighs strongly against compliance with those site-specific requirements.**

## 5. The revised housing mix fails to meet policy or identified local housing need

JAG's concern is not simply the number or affordability of the conventional homes proposed, but **whether the revised scheme provides the type and size of homes needed on a site where ARCH5 expressly prioritises conventional housing.**

The revised conventional housing mix remains heavily weighted towards smaller homes. **Of the 167 conventional homes, 73% would be one or two bedroom properties (32% one bedroom and 41% two-bedroom).** Although the revised affordable housing mix includes proportionately more larger homes, **the total number of affordable family-sized homes increases by only one, from 11 to 12.**

Islington Local Plan Policy H2 is relevant to the mix of the conventional housing. Its supporting text states that **one bedroom units should not be the predominant unit size across a development proposal overall, or within its individual market and affordable components**, subject to the specified exception for certain intermediate tenures. The Local Plan's housing priorities give high priority to two-bedroom Social Rent homes and medium priority to three-bedroom Social Rent homes; for market housing, two bedroom homes are a high priority and three bedroom homes a medium priority.

**The overall development mix provides important further context. The scheme proposes 409 residential units/bedspaces in total: 167 conventional homes and 242 PBSA bedrooms. Of these, 242 - 59% of the total - would be student studios. A further 54 would be one-bedroom conventional homes. Taken together, 296 of the 409 units/bedspaces - approximately 72% - would therefore comprise either a student studio or a one-bedroom conventional home. Only 50 - approximately 12% - would provide three or more bedrooms.**

## Extrapolation from Local Plan Policy H2 Table 3.2 of conventional housing size giving mix priorities for each housing.

| Tenure | 1 bedroom | 2 bedroom | 3 bedroom | 4 bedroom + |
|---|---|---|---|---|
| Social rent | low/medium | high | medium | low |
| Market | low | high | medium | low |

## Housing mix as proposed

| Unit size by bedroom nos. | studios | 1 bed | 2 bed | 3 bed | 4 bed | total |
|---|---|---|---|---|---|---|
| All housing units including student housing | 242 | 54 | 69 | 47 | 3 | 409 |
| Percentage breakdown of conventional housing | 0% | 32% | 41% | 28% | 1.8% | 100% |
| Unit percentage mix of all housing including student housing | 59% | 13% | 17% | 12% | 0.3% | 100% |

JAG does not rely on those figures as a direct application of Policy H2 to the PBSA bedrooms: the Local Plan expressly states that Policy H2 applies to Use Classes C3 and C4, with other forms of residential accommodation addressed through separate policies. **They are nevertheless highly relevant to the overall balance of development on this particular site. ARCH5 expressly prioritises conventional housing and requires that the quantum of student accommodation "must not weigh against the provision of priority conventional housing" and "must ensure that the development can achieve a fully policy compliant quantum and tenure of affordable housing."**

That context is particularly important because the revisions have moved the scheme **away from**, rather than towards, the site's conventional-housing priority. The proposal now provides **11 fewer conventional homes and 52 fewer affordable homes than the refused scheme, while retaining all 242 PBSA bedrooms.**

The revised housing mix is also relevant under the 2026 NPPF. Policy HO7 provides that **"substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community."** Policy HO1 identifies the size, type and tenure of housing or other accommodation needed for different groups, expressly including those requiring affordable housing, families with children and students. **The housing benefit of the scheme should therefore be assessed not simply by the quantity of accommodation proposed, but by the extent to which its size, type and tenure respond to evidenced local need.**

The remaining 39 affordable conventional homes would all be Social Rent, **which JAG welcomes**. However, that improvement in tenure within the much smaller affordable housing offer **does not compensate for the loss of 52 affordable homes overall**, nor does it address the continued predominance of smaller conventional homes.

The March 2026 *Support for Housebuilding London Plan Guidance* does not treat its 20% affordable housing threshold as a ceiling. The GLA expressly **"encourages partners to deliver affordable housing in excess of 20% wherever possible"**, with grant potentially available subject to the relevant funding requirements. *(Support for Housebuilding London Plan Guidance, March 2026, para 4.8.1.)*

The position of the PBSA is also significant. The applicant acknowledges that **no affordable student accommodation would be provided** and relies on viability and the enabling role of the PBSA in seeking to justify that acknowledged policy conflict. Those viability arguments are considered further in Sections 11 and 15. **They do not alter the fundamental housing-mix issue: all 242 PBSA bedrooms are retained while the conventional and affordable housing offer has been reduced.**

JAG has consistently accepted that **an appropriate element of student accommodation could form part of the redevelopment of Archway Campus**. The objection is to its scale and its relationship with the priority use established for this particular site. At **242 bedrooms, PBSA accounts for 59% of the 409 conventional homes and PBSA bedrooms proposed**, while the revisions reduce the conventional housing contribution which ARCH5 expressly prioritises.

**In effect, the Mayor is being asked to accept acknowledged policy conflicts on the basis that this particular development model would otherwise not proceed. JAG does not consider that the claimed viability of a non-policy-compliant development model provides sufficient justification for approving it. On a site where the Development Plan expressly prioritises conventional housing, the retention of all 242 PBSA bedrooms alongside a reduced conventional and affordable housing offer strengthens, rather than diminishes, the case for refusal.**

## 6. Design Quality of New Housing

The new build portion of the conventional housing is being provided in 3 new build 6 and 7 storey blocks, A, B and C, facing onto Highgate Hill. The developer states that this housing will be of exceptional design quality. **JAG disputes this and objects to the design of these units for the reasons set out below.**

Block A

To deal firstly with Block A. This is the most northerly block, and consists of 6 and 7 storeys. Whilst this block has been substantially redesigned to remove the sub-standard, single aspect element of the previous scheme, it has been **replaced with deck access which is arguably a problematic form of configuration.** As habitable rooms open off the deck access, this leads to **issues which include privacy, noise, security and weather and water ingress.** The historic **poor reputation of deck access,** particularly as it is deemed to attract anti-social behaviour coupled with poor maintenance in social housing projects, has led to it being abandoned in many cases as a layout option. This can cause problems with mortgage and resales.

Another issue with the claimed “exceptional design quality” of the new blocks is that the **majority of the balconies are of a northern aspect**. They will be dark and dank and will get little sunlight.

Block B

This block is a rhomboid shaped building 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**.

Block C

The triangular Block C is shallow plan, thus avoiding the issues of deck access.

**In conclusion, there does appear to be a situation where substandard housing will provide poor amenity for both the neighbours and the future occupants of these blocks.**

## 7. The emergency housing measures do not override the scheme's Development Plan conflicts

The March 2026 *Support for Housebuilding London Plan Guidance* introduces a temporary alternative affordable-housing route intended to support housing delivery. It is a material consideration, but it **does not form part of the statutory Development Plan and expressly departs from adopted London Plan Policy H5**. Even where the time-limited route applies, it does not displace other relevant Development Plan policies.

The Guidance contains specific provisions for mixed C3/PBSA schemes. Paragraph 4.4.5 provides that the time-limited route will not apply to PBSA development, or to schemes where PBSA or Large-scale Purpose-built Shared Living comprises **50% or more of total residential Gross Internal Area (GIA)**. For mixed schemes below that threshold, footnote 8 provides that the C3/C4 component may benefit

from the time-limited thresholds **where the relevant London Plan PBSA requirements are met**. *(GLA, Support for Housebuilding London Plan Guidance, March 2026, para 4.4.5 and footnote 8.)*

The applicant's revised Design & Access Statement gives a GIA of **9,842.5 m² for the student accommodation and 21,471.6 m² for the conventional residential accommodation**. On those figures, PBSA represents approximately **31.4% of the combined residential GIA** and is therefore below the 50% exclusion threshold. *(Archway Campus Design & Access Statement – Revised Proposals, Rev 2, May 2026, section 8.1, Accommodation Schedule.)*

**Being below that threshold does not, however, establish that the C3 component qualifies for the time-limited route.** As set out below, the applicant acknowledges non-compliance with important requirements of London Plan Policy H15, including nominations and affordable student accommodation. **Since footnote 8 makes access to the time-limited thresholds conditional on the relevant PBSA requirements being met, there is a substantive issue as to whether the C3 component qualifies.** *(GLA, Support for Housebuilding London Plan Guidance, March 2026, para 4.4.5 and footnote 8; London Plan 2021, Policy H15.)*

**Even if the C3 component qualifies for the time-limited route, that would affect the affordable-housing pathway; it would not resolve the scheme's separate conflicts with the adopted tall-building strategy, ARCH5 and other Development Plan policies, or the identified heritage and townscape harm.**

## 8. The changed housing delivery context does not displace the Development Plan

JAG recognises that the housing delivery context has changed materially. **Islington's 2025 Housing Delivery Test result of 69% reinforces the importance of bringing forward housing on this allocated brownfield site, and JAG supports substantial housing delivery at Archway Campus.** *(MHCLG, Housing Delivery Test: 2025 measurement, 17 August 2026.)*

Indeed, the acute need for housing reinforces rather than weakens the central purpose of ARCH5. The allocation expressly responds to Islington's very limited supply of development land by identifying conventional housing as the site's **"most urgent need"**. The revised scheme moves further away from that priority: conventional homes fall from **178 to 167** and affordable homes from **91 to 39**, while all **242 PBSA bedrooms are retained**.

**Nor does the Mayor's *Support for Housebuilding London Plan Guidance* provide a general dispensation from the Development Plan.** The GLA expressly states that the Guidance does not have statutory weight as part of the Development Plan and is instead a material consideration. Its additional time limited affordable housing route departs from London Plan Policy H5; it does not disapply Policy D9, alter the ARCH5 allocation, designate Archway Campus as a location for a tall building, or remove the statutory starting point that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. *(Mayoral Decision MD3490, paras 1.2, 1.5 and 6.6.)*

**The** revised NPPF 2026 **is an important material consideration in determining this application.** JAG recognises that the revised Framework gives strong support to development within settlements and to making efficient use of highly accessible land. It also retains the fundamental principle that the planning system should be **"genuinely plan-led"** and that planning law requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. *(NPPF 2026, Chapter 1, paras 2–3.)*

Policy S4 in the new Framework applies to development proposals within "settlements" and provides that such proposals **"should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects"** when assessed against the Framework's national decision-making policies. *(NPPF 2026, Policies S3(1)(a) and S4(1).)*

JAG recognises that this strengthens the policy support for substantial redevelopment of Archway Campus. **However, Policy S4 does not make approval automatic.** In identifying circumstances in which the benefits of development are likely to be substantially outweighed by adverse effects, policy S4 expressly includes proposals which would have a **"substantial adverse impact"** in relation to **"the allocation or safeguarding of land or buildings for particular uses in the development plan"**, unless the specified exceptions apply*. (NPPF 2026, Policy S4(2)(a)(i).)*

That provision is relevant to ARCH5. The Campus is an allocated site and ARCH5 expressly identifies conventional housing as the site's most urgent need. It permits an element of student housing only where its quantum **"must not weigh against the provision of priority conventional housing on the site"** and **"must ensure that the development can achieve a fully policy compliant quantum and tenure of affordable housing."** The revised scheme retains all 242 PBSA bedrooms while providing fewer conventional homes and 52 fewer affordable homes than the refused scheme. *(Islington Local Plan, Site Allocation ARCH5.)*

Nor does the revised Framework equate making efficient use of highly accessible land with maximising building height. Policy L3 strongly supports increased densities and efficient use of land, particularly in highly connected locations, but this must be considered alongside the Framework's policies on housing need, design, context and heritage. Policy DP3 requires development to respond to the history, character and features of its site and setting so that it integrates with and enhances its surroundings. *(NPPF 2026, Policies L3 and DP3.)*

**There is therefore no inherent conflict between the Framework's strong support for substantial, higher density redevelopment of accessible brownfield land and the Development Plan's spatial approach to tall buildings. The issue is whether achieving it requires an 82-metre tower on a site which Islington specifically assessed through the Local Plan process and did not identify as suitable for a tall building.**

The changed housing context is therefore an important material consideration, but **it does not by itself justify setting aside the plan-led approach to tall buildings or the site-specific priorities established through ARCH5**. The September 2026 revisions make the planning balance more difficult, not less: the 27-storey tower and all 242 PBSA bedrooms remain, while the scheme's contribution to conventional and affordable housing has been reduced.

## 9. Islington's policy deliberately prioritises conventional housing over further PBSA

Islington's approach to purpose-built student accommodation must be understood in the context of the borough's exceptionally high historic delivery of PBSA and its acute shortage of development land.

The Council's evidence base records that **4,673 student bedrooms were delivered in Islington between 1999 and 2012 - approximately one fifth of all student bedrooms completed across London during that period**. Between 2006/07 and 2011/12 alone, 3,120 student bedrooms were completed, including more than 1,000 in 2007/08. The Council concluded that this exceptionally high rate of PBSA development had occurred **"to the detriment of other priority land uses - principally residential"**, at a time when the borough was failing to meet its wider housing needs. *(Islington Council, Local Plan Topic Paper: Specialist Housing, February 2020, paras 4.2 and 4.5–4.7.)*

This is the background to the deliberately restrictive approach contained in Policy H6 of Islington's Local Plan. The supporting text explains that, because of Islington's substantial historic delivery of student accommodation and the need to prioritise conventional housing and employment growth in a borough with severe constraints on land, further PBSA is restricted to specified circumstances. *(Islington Local Plan, Strategic and Development Management Policies, Policy H6 and para 3.94.)*

**Importantly, that approach was expressly considered through the independent examination of the Local Plan.** The Inspectors recognised both the London-wide need for additional PBSA and evidence of demand within Islington. They nevertheless took account of Islington's limited housing land supply, the greater long-term flexibility of conventional housing, the borough's exceptionally high historic delivery of student accommodation and the contribution of the wider rental market to housing students. They concluded that **"the prioritisation of conventional housing [is] justified"** and that **Policy H6 as modified "strikes an appropriate balance".** *(Islington Local Plan Inspectors' Report, July 2023, paras 70–75, particularly para 73.)*

The restriction on further PBSA is therefore **not based on an assumption that student housing has no value or that there is no demand for it**. It represents a deliberate planning judgement, tested through the Local Plan examination, about how an exceptionally scarce supply of developable land in Islington should be used after a period of unusually high PBSA delivery.

**That distinction is directly relevant to Archway Campus.** The issue is not whether 242 student bedrooms would provide a benefit. It is whether that benefit justifies devoting a substantial part of

ARCH5 - where the Local Plan expressly prioritises conventional housing - to PBSA, particularly where the revised scheme **retains all 242 student bedrooms while reducing conventional homes from 178 to 167 and affordable homes from 91 to 39.**

## 10. The evidence does not establish a compelling site-specific case for 242 PBSA bedrooms

The applicant's Student Accommodation Demand Assessment relies substantially on aggregate student numbers and catchment evidence and acknowledged that potential interest from London universities had not been explored. **It therefore does not demonstrate a particularly strong institutional or site-specific need for 242 PBSA bedrooms at Archway Campus.**

Changes in the higher-education sector reinforce the importance of current and site-specific evidence. In the year ending June 2026, sponsored study visa grants were **41% below their June 2023 peak**. Cushman & Wakefield reports that postgraduate-taught entrants fell by **9.7% in 2023/24**, with the cumulative impact by 2024/25 potentially reaching 17.3%. *(Home Office,* Immigration System Statistics, year ending June 2026*, August 2026; Cushman & Wakefield, UK Student Housing Report 2025/26.)*

Other market evidence presents a mixed rather than uniformly weak picture. Unite Students reported occupancy falling from **97.5% in 2024/25 to 95.2% in 2025/26** and described a more competitive leasing market, while also identifying continuing demand at the strongest universities. Knight Frank similarly reports continuing demand alongside substantial new supply: **4,350 new PBSA beds were delivered in London during 2025 and a further 14,600 were under construction at the beginning of 2026.** *(Unite Group, Preliminary Results for the year ended 31 December 2025, February 2026; Knight Frank, UK Student Market Update Q4 2025, February 2026.)*

**JAG does not contend that London-wide oversupply has been established.** The evidence instead indicates that demand is increasingly differentiated by institution, student type, price and location. That makes current evidence of demand for **this particular 242-bedroom scheme** more, rather than less, important.

More recent evidence reinforces the need for caution in assuming that historic patterns of PBSA demand will continue unchanged. Reporting in October 2026 identified financial difficulties among a number of higher end PBSA providers, against a background of **falling international student numbers, affordability pressures and rising development and borrowing costs**. The same evidence indicates that the market is increasingly differentiated: demand remains stronger in London and around the strongest universities, while providers are becoming more selective about location and institutional demand. **This does not establish an absence of demand for PBSA in London, but it reinforces the importance of robust, current and site-specific evidence before substantial weight is attributed to the proposed 242 bedrooms.** *(The Guardian, 5 October 2026, "Collapse of providers of high-end digs leaves students in shock".)*

**Recent experience elsewhere in London also demonstrates why substantial weight should not automatically be attached to PBSA consent as though delivery were assured.** At Travis Perkins/Baltic Wharf in Paddington, the Mayor called in a scheme refused by Westminster and planning permission was subsequently granted for 605 PBSA bedrooms. Unite Students nevertheless decided not to proceed, stating that the project was **"not financially viable based on our target return requirements and an extended delivery programme"**, and wrote off approximately £10 million in planning costs. *(GLA, Travis Perkins/Baltic Wharf Representation Hearing, November 2025; Unite Group, 2025 Full Year Results.)*

The Paddington case does not establish that the Archway PBSA would itself be unviable. **It does, however, demonstrate that even a major London PBSA scheme which has secured planning permission following Mayoral intervention may not ultimately be delivered** where the commercial case changes. That experience reinforces JAG's case that substantial weight should not be attached to the 242 PBSA bedrooms as a benefit of the Archway scheme without robust evidence that there is sufficient site-specific demand and a realistic prospect of delivery.

**That caution is particularly relevant at Archway because, unlike the Paddington scheme when originally promoted by Unite, no higher education provider is identified as committed to the proposed PBSA and no affordable student accommodation is proposed.**

The July 2026 Draft London Plan provides further strategic context. It proposes a ten-year Islington requirement of **300 additional PBSA bedspaces for 2027/28–2036/37**. This is emerging policy rather than an adopted cap, but 242 bedrooms on one site would amount to approximately **81% of that proposed borough requirement**. *(Draft London Plan 2026, Policy HN5, paras 3.69–3.70 and Table 3.6.)*

The London Plan recognises that PBSA contributes to meeting London's overall housing need. **The question is therefore not whether 242 student bedrooms would provide a housing benefit, but what weight should be attached to that benefit on this particular site.** ARCH5 expressly prioritises conventional housing, while Policy H15 imposes specific requirements on PBSA, including nomination arrangements and affordable student accommodation.

**In these circumstances, the applicant has not established a compelling site-specific case for retaining all 242 PBSA bedrooms while conventional homes are reduced from 178 to 167 and affordable homes from 91 to 39, particularly where important Policy H15 requirements remain unmet.**

## 11. The PBSA fails key nomination and affordable-PBSA policy requirements

Islington Policy H6 requires PBSA proposals to demonstrate through a binding nomination agreement that the accommodation will be occupied by students of one or more higher education providers. London Plan Policy H15 separately requires the **majority of PBSA bedrooms, including all affordable student accommodation bedrooms, to be secured through a nomination agreement**, and requires the maximum level of affordable student accommodation to be secured.

**The applicant expressly acknowledges that there is no nomination agreement and identifies the nomination-agreement requirement as "NON-COMPLIANT". It also acknowledges that the Development Plan requirement for affordable PBSA is not met.**

The applicant asks the Mayor to accept these conflicts on viability and enabling use grounds, stating that a nomination agreement has been omitted because such agreements reduce value and that this value is required to enable the wider redevelopment.

**However, the applicant has not provided sufficient evidence to show that complying with the nomination-agreement requirement would materially reduce the value or viability of the PBSA.**

The applicant has not provided any justification that compliance with the nomination requirement would materially undermine the commercial performance of the PBSA element. **The claimed viability justification for departing from this Development Plan requirement should accordingly be given limited weight, and the acknowledged conflict with the nomination requirement remains a reason for refusal.**

**The admitted absence of a nomination agreement also reinforces the evidential issue identified in Section 9.** The GLA Guidance explains that the nominations requirement is intended to link PBSA provision to higher-education providers' recruitment plans, providing a **"necessary feedback loop"** between institutional demand and proposed supply. Although the Guidance does not require a nomination agreement to be concluded at application stage, it states that the decision-maker will want to ensure **"a reasonable prospect of compliance"** and advises applicants to demonstrate engagement with one or more higher-education providers, exploring their interest in the scheme and appetite to pursue a nomination agreement. *(GLA, Purpose-built Student Accommodation London Plan Guidance, November 2024, paras 3.1.4 and 3.2.1–3.2.2.)*

**That evidence is particularly important in the context of this application, which proposes 242 PBSA bedrooms on a single site, and given the borough-wide PBSA context set out in Section 9.** Given the scale of the proposed provision, JAG considers that there should be clear evidence that meaningful engagement with higher-education providers has taken place and that there is a reasonable prospect of securing a policy-compliant nomination arrangement. The applicant's own demand assessment acknowledged that potential interest from London universities had not been explored.

**The proposal consequently combines acknowledged non-compliance with the nomination and affordable-PBSA requirements with an absence of identified institutional commitment to the proposed 242 bedrooms. These are substantive policy conflicts and reduce the weight that should be given to the PBSA benefit in the overall planning balance.**

## 12. The benefit of 210 PBSA bedrooms cannot be separated from the 27-storey tower required to accommodate them

The scale of the proposed student accommodation and the scale of the Apex tower are intrinsically linked. Of the 242 PBSA bedrooms proposed, **210 - approximately 87% - would be accommodated in the 27-storey Apex Building**, with the remaining 32 located in the retained Clerkenwell Building.

The applicant's own Design and Access Statement makes clear that the height of the Apex Building is a consequence of its design approach. It explains that, at the southern apex of the site, the footprint of the new buildings has been reduced in order to maximise public realm, with **"height generated"** as a result. The Student Accommodation Building is then located on this constrained footprint.

**The planning benefit attributed to those 210 PBSA bedrooms therefore cannot sensibly be considered separately from the 82-metre tower required to accommodate them.** The same element of the scheme which delivers the great majority of the PBSA is also the element which gives rise to the scheme's principal conflict with the adopted tall-building strategy and to the associated townscape and heritage harm.

JAG does not dispute that PBSA can contribute to meeting London's housing needs. However, as set out in Sections 8-10, Islington's adopted policy deliberately prioritises conventional housing over further PBSA, while this particular PBSA proposal does not comply with important nomination and affordable-PBSA requirements.

**The relevant question in the planning balance is therefore not simply whether 210 additional student bedrooms constitute a benefit, but what weight should be attached to that benefit when they are delivered through an 82-metre tower on a site which the adopted Local Plan does not identify as suitable for a tall building.**

That question has become more important as a result of the revisions. **The 27-storey tower and all 242 PBSA bedrooms remain, while conventional housing has fallen from 178 to 167 homes and affordable housing from 91 to 39 homes.**

**In JAG's view, the benefits arising from the PBSA do not justify the substantial conflict with the adopted tall-building strategy or outweigh the associated townscape and heritage harm.**

## 13. The revisions do not resolve the substantial heritage and townscape harms

The heritage objection remains substantial. Having considered the applicant's amendments and additional visual evidence, Historic England confirmed on 4 September 2025 that its **"overall position regarding the scheme remains largely unchanged."** It concluded that the impacts on the Holborn Union Infirmary Conservation Area **"remain considerable and harmful"** and that it remained **"deeply concerned by this scheme on heritage grounds"** because of multiple instances of harm to designated and non-designated heritage assets.

The applicant disputes aspects of Historic England's assessment of the significance of the historic infirmary complex, including buildings associated with Henry Saxon Snell, and the degree of harm arising from alteration or demolition. Historic England expressly noted that, **"for the sake of brevity"**, it had not repeated its earlier advice on significance, but it did not withdraw that assessment and maintained its overall heritage position after considering the additional material.

The proposal involves substantial direct intervention within the Holborn Union Infirmary Conservation Area, including complete demolition of the Furnival, Ely and Staples Buildings and the Nurses' Accommodation, **the latter specifically to enable construction of the student tower**. The heritage effects of the Apex tower therefore arise not only from its height and effect on surrounding heritage assets and views, but also from the intervention within the historic complex required to accommodate it.

The heritage effects are not confined to the Campus Conservation Area. **JAG's original objection identified harm to the character, setting and views of seven Conservation Areas**, including the Holborn Union Infirmary Conservation Area in which the site is located. Those wider concerns remain because the principal source of that impact - the 82-metre Apex tower - remains substantially unchanged.

## 13.1 Historic England's assessment and JAG's new visual evidence

Historic England's assessment of the additional visual evidence identifies continuing concerns beyond the Campus itself. **Those conclusions were necessarily reached on the basis of the visual material then before Historic England. JAG's accompanying Visual Evidence Addendum now raises significant concerns about whether that material adequately represented the likely scale, prominence and visibility of the tower. This is important context when considering the degree of harm identified by Historic England.**

- **Grade II* Waterlow Park:** Historic England assessed the impact from the applicant's selected viewpoints as a small harmful impact towards the lower end of less than substantial harm, while expressly remaining concerned that **the tower would rise above tree canopies from other locations**, increasing the perception of urban development in panoramic views historically characterised by a clear distinction between Highgate and central London. **JAG's additional visual evidence reinforces precisely that concern.** Its comparison views demonstrate that the tower would be substantially more prominent from other representative positions within the Park than the applicant's selected viewpoints suggest. In particular, the comparison for View 41 shows that moving approximately 18 metres from the applicant's heavily screened camera position produces a markedly different view of the tower, despite both photographs being taken with trees bare.
- **Grade I registered Highgate Cemetery:** Historic England found that the applicant's new wirelines did not themselves demonstrate additional harm, but nevertheless identified **a small but discernible degree of harm** and remained concerned that the tower could become increasingly visible above the tree canopy and from designed viewing points as woodland management opens views. **JAG's evidence strengthens the significance of that qualification.** The applicant's visual evidence should not be treated as establishing the maximum likely visibility of the tower, particularly where existing tree cover is relied upon as screening and may change materially over time.
- **Protected local views towards St Paul's Cathedral:** the applicant's winter visualisations reinforced Historic England's concern. It found that the tower would be **"far taller than anything around it"** and that its scale, colour and form would infringe the silhouette of trees and buildings framing views towards central London and the dome of St Paul's. **JAG's comparison from Archway Bridge further demonstrates the potential prominence of the tower within Protected View LV5 and reinforces, rather than diminishes, Historic England's concern.**

**Historic England's assessment should therefore not be read as establishing that the harm shown in the applicant's selected visualisations represents the full extent of the likely impact. JAG's additional evidence indicates that the tower may be materially more visible and prominent from representative viewpoints than those images suggest. The degree of harm identified by Historic England should therefore be regarded as a minimum evidenced position on the material it considered, rather than as demonstrating that greater harm could not arise.**

## 13.2 Concerns about the applicant's visual evidence

**JAG has undertaken a detailed review of the applicant's visual evidence which raises significant concerns about whether the submitted images adequately convey the likely visibility, scale and prominence of the 82-metre tower.** That analysis is submitted separately as *JAG Addendum – Visual Evidence for the Archway Campus Tower* and should be read alongside this objection.

The applicant states that its visualisations have been prepared in accordance with Landscape Institute Technical Guidance Note 06/19 (TGN 06/19). JAG's review identifies **four recurring features which, taken together, have the effect of making the tower appear smaller or less visible: the consistent use of a 24mm wide-angle lens; the selection of viewpoints where foreground trees, buildings or other features screen the tower; reliance in several important views on summer foliage; and, in one case, screening by a temporary scaffold-wrapped building which has since been removed.**

**The question of image scale is particularly important.** TGN 06/19 uses a 50mm full-frame lens as its reference and identifies a 150% enlargement as the default for Type 4 visualisations, with an intermediate scale suggested for townscape work. JAG's analysis calculates that, at the same print width, the applicant's 24mm images represent approximately **48% of the TGN reference scale and**

**about one-third of the Type 4 default scale**. The applicant's images may therefore materially understate the apparent scale and prominence of the tower when viewed in the submitted format.

There is also a significant issue concerning viewpoint selection. TGN 06/19 states that photographers should locate the camera so that foreground screening does not obscure the site unless that screening is characteristic of the view being illustrated, and requires visualisations to provide a fair, objective and unbiased representation. **JAG's comparison photographs demonstrate instances where the tower is substantially more apparent from positions at or close to the applicant's selected viewpoints.**

The differences are particularly striking in **Waterlow Park, Highgate Hill/The Bank, Highgate Hill/Cholmeley Park, Upper Holloway and the protected view from Archway Bridge towards St Paul's Cathedral.** The Parolles Road comparison also identifies an applicant view in which the tower was screened by a scaffold-wrapped building which had subsequently been removed.

**JAG does not present its comparison montages as survey-verified visualisations.** Their purpose is to test whether the applicant's selected views provide a representative impression of the tower's likely visual effect. The montages have been cross-checked against the applicant's own visual material and are accompanied by an explanation of their methodology and limitations. **Taken together, they provide substantial reason to question the weight that should be placed on the applicant's images as evidence that the tower would have limited visual impact.**

The wider townscape and visual effects are also not confined to the heritage viewpoints assessed by Historic England. **JAG's original objection included photographic evidence from the slopes of the Boating Pond on Hampstead Heath.** JAG considers that the effect of introducing an 82-metre tower into views from the Heath should also form part of the assessment of the scheme's wider townscape and visual impact.

The assessment should therefore consider **the sequence and range of views across Waterlow Park, Hampstead Heath, Highgate Cemetery and the elevated historic townscape of Highgate**, rather than relying unduly on individual viewpoints in which the proposed tower is screened or visually diminished.

### Weight to be given to the heritage harm

The revised 2026 NPPF reinforces the weight which must be given to these effects. Policy HE4 requires any harm to the significance of a designated heritage asset to have a **"clear and convincing justification".** Policy HE6 requires **"substantial weight"** to be given to the conservation of designated heritage assets and expressly provides that **"Any harm to a designated heritage asset will be a matter of considerable importance and weight."** The identified heritage harm must therefore carry substantial weight in the planning balance.

The harm and wider visual effects are **cumulative, rather than confined to a single asset or view**: considerable and harmful impacts on the Holborn Union Infirmary Conservation Area; harm associated with Grade II* Waterlow Park; potential harm to Grade I registered Highgate Cemetery which may become more acute as tree cover changes; adverse effects on protected views towards St Paul's; harm identified by JAG to the character, setting and views of seven Conservation Areas; and wider townscape and visual effects on Hampstead Heath.

Historic England leaves the ultimate planning balance to the decision-maker. However, **the September revisions do not provide a stronger justification for accepting the identified heritage and townscape harm.** The 27-storey tower giving rise to the principal concerns remains unchanged, while the scheme now delivers fewer conventional homes and substantially fewer affordable homes: conventional housing has fallen from 178 to 167 homes and affordable housing from 91 to 39.

**The applicant's visual evidence does not overcome the substantial visual, townscape and heritage harm identified by JAG and Historic England. On the contrary, JAG's additional evidence demonstrates that the scale, prominence and visibility of the 82-metre tower have been materially understated. Those harms, combined with the tower's fundamental conflict with the adopted tall-building strategy, provide a strong basis for refusal.**

## 14. Neighbouring residential amenity concerns remain

JAG maintains its concerns about the effects of development at this scale on neighbouring residential amenity, particularly for properties in Lidyard Road, Despard Road The Academy and The Barn.

**The relationship between Block A and existing neighbouring homes remains particularly close.** Separation distances between Block A and the boundary of The Academy and The Barn is 4.5m. And it closely impacts on the adjacent Lidyard Road homes - approximately **10.9 metres to 17.3 metres**, with parts of the proposed development coming within approximately **2 metres of neighbouring property boundaries**.

**Dimensions which appear to show an acceptable distance are not taken from the building edge but from the habitable room windows onto the recessed balcony some 2m back** from the face of the building. Whilst this may address the strict criteria of distance between windows of habitable rooms, it does nothing to deal with overlooking from the balconies nor the loss of daylight and sunlight to the properties caused by having a 7 storey building so close to the boundary.

All together these relationships are materially tighter than the approximately **18 - 21 metre separations provided between residential buildings within the development itself.**

This distinction is important. **The scheme provides greater separation between many of its own new buildings than it provides between Block A and existing neighbouring homes.** In assessing whether the development has been appropriately optimised, the Mayor should therefore consider not only the amenity provided within the scheme but the effects of its scale, massing, windows and balconies on the **privacy, outlook and sense of enclosure** experienced by existing residents.

JAG acknowledges that the **revised external daylight and sunlight assessment is generally favourable,** with most effects assessed as unnoticeable or modest. External daylight and sunlight effects are therefore not relied upon as a principal ground for refusal. **Those results do not, however, resolve the separate issues of privacy, overlooking, outlook and enclosure arising from the close relationship between Block A and existing homes.**

There is also a relevant contrast within the proposed development. **100% of the assessed rooms in the new student tower meet the target daylight illuminance, compared with 76% of rooms in new residential Blocks A-C. Similarly, 70% of new student rooms meet the suggested sunlight target, compared with 57% of new-build residential dwellings.**

JAG does not suggest that these figures alone make the conventional housing unacceptable. **They do, however, provide relevant context when considering what the proposed massing has been optimised to achieve.**

Taken together, these matters reinforce JAG's concern that **optimisation of the site has not been demonstrated to strike an appropriate balance between development capacity and residential amenity - particularly the amenity of existing neighbouring residents.**

## 15. The applicant's viability evidence does not demonstrate that this scale of development is necessary

The applicant has submitted and relies upon detailed viability evidence in the Financial Viability Assessment prepared by Savills (April 2026), while presenting the 242 PBSA bedrooms as an enabling use supporting delivery of the wider redevelopment and its public benefits. **To the extent that the claimed viability deficit is relied upon to justify this development model and its scale, the assumptions producing that deficit are relevant to the planning balance.**

There is a particularly substantial unresolved difference over **benchmark land value**. The Savills Financial Viability Assessment maintains a Site Value Benchmark of **£12 million**. By contrast, Islington's independent viability adviser, BPS, adopted a benchmark of **£3.05 million**. Savills also records that the GLA Viability Team considered that Existing Use Value plus a landowner premium (EUV+) should be the primary approach, with land-transaction evidence used only as a cross-check, and that, **"based on the information available at that stage", the Site Value Benchmark "should not exceed £3M".** *(Savills, Financial Viability Assessment, April 2026, paras 5.1.11–5.1.15.)*

**The applicant's £12 million benchmark is therefore FOUR TIMES the figure previously considered appropriate by Islington's independent adviser and the GLA Viability Team.** Savills' own sensitivity testing shows that using the lower benchmark materially reduces the stated viability deficit, although it does not eliminate it.

The relevance of the viability evidence arises because the applicant has itself submitted and relied upon it in support of the economics and enabling-use case for the proposed development. **The applicant's viability case does not therefore demonstrate that development of this scale is necessary or that the identified policy, townscape and heritage harms should be accepted.**

Recent experience elsewhere in London reinforces the need for caution. **Unite Students abandoned its consented 605 bedroom Paddington PBSA scheme** following Mayoral call-in, **concluding that the scheme was not financially viable against its target return requirements**. This illustrates that planning permission and projected PBSA value should not be treated as synonymous with deliverability.

**The substantial difference over benchmark land value further reduces the weight that can be placed on viability as justification for the scheme.**

## 16. The applicant has not demonstrated that the 27-storey tower is necessary

The applicant itself previously explored a **substantially lower-rise configuration providing approximately 184 homes and 187 PBSA bedrooms**.

JAG does not present that earlier design as a proven viable alternative, nor asks the Mayor to conclude that it should be built. **Its relevance is narrower but important: it demonstrates that the applicant has itself explored a materially different development model involving more conventional homes, fewer PBSA bedrooms and substantially less height.**

The earlier design therefore provides evidence that **substantial redevelopment and meaningful housing delivery on the Campus do not physically depend upon the current 27-storey form.**

**The applicant has not demonstrated that an 82-metre, 27-storey tower is necessary to secure the redevelopment of Archway Campus or a substantial contribution to housing delivery. The benefits specifically attributable to that height do not justify the identified Development Plan conflicts and heritage and townscape harm. The proposed tower should therefore be refused.**

## 17. The benefits of redevelopment should not be attributed to the 27-storey tower

A number of substantial benefits arise from the redevelopment of Archway Campus **in principle**. These include bringing a long-vacant brownfield site back into use, new conventional and affordable housing, restoration and reuse of historic buildings, new public realm, landscaping, improved permeability and an appropriate element of student accommodation.

**Those benefits should be distinguished from benefits which genuinely depend upon the particular scale and form of the development now proposed.** As set out in Section 15, the applicant has itself explored a materially lower-rise development capable of delivering substantial redevelopment of the Campus.

The relevant question in the planning balance is therefore not whether redevelopment of Archway Campus would deliver substantial benefits. **It is whether the additional benefits specifically attributable to the 27-storey tower and the proposed quantum of PBSA are sufficient to justify the resulting Development Plan conflicts and identified heritage and townscape harm.**

**The applicant has not demonstrated that they are.** The proposal combines an 82-metre tower on a site not identified as suitable for a tall building with a substantially reduced affordable-housing offer, acknowledged PBSA policy conflicts and continuing heritage and townscape harm. **The substantial benefits of redeveloping the Campus should not, in themselves, be treated as justification for accepting those conflicts and harms.**

## 18. Approval would have implications for the plan-led approach across London

Approval would not create a binding legal precedent. **It could, however, have wider significance for the plan-led approach to tall buildings across London.**

Archway Campus lies immediately beside, but outside, locations specifically identified for tall buildings through Islington's Local Plan. The issue therefore extends beyond this particular site: **it concerns the weight to be given to tall-building locations and boundaries established through the statutory plan-making process.**

If the benefits of an individual scheme are treated as sufficient to justify a substantially taller building immediately beyond an identified tall-building location, **the practical force of the plan-led approach could be weakened.** That concern is particularly significant here because the proposed tower is not comparable in height with the nearby identified locations: at approximately **82 metres, it would be around 36 metres higher than the upper height at A2/Vorley Road and 30 metres higher than the maximum at A1/Hill House.**

The importance of identifying appropriate locations for tall buildings through the Local Plan has long formed part of the Mayor's approach. In evidence to the London Assembly, the Deputy Mayor for Planning described identification of appropriate locations through the Local Plan as **"really crucial".** The Mayor's written statement to the examination of the London Plan similarly stated that **"the identification of appropriate locations for tall building should form part of the process by which a borough establishes its spatial options for growth"**, explaining that boroughs should establish where capacity for growth exists and where, within those areas, tall buildings can play a positive role. *(Sources: London Assembly Plenary, 5 March 2020; Mayor of London, London Plan Examination in Public, Matter 41 – Tall Buildings, para 41.17.)*

**The call-in changes who determines the application; it does not change the Development Plan.** The adopted London Plan and Islington Local Plan continue to apply. JAG considers that the benefits advanced for this scheme do not justify an 82-metre tower on ARCH5 when the adopted plan does not identify the Campus as suitable for a tall building and identifies substantially lower heights at the neighbouring A1, A2 and A3 locations.

London urgently needs more homes, and JAG supports making effective use of this highly accessible brownfield site. **But optimisation of land should not automatically mean maximising building height.**

The plan-led system exists to reconcile housing delivery with location, housing need, design, townscape, heritage, infrastructure and long-term place-making. **If housing need were routinely treated as sufficient justification for departing from the spatial strategy identifying where tall buildings are appropriate, optimisation would risk becoming indistinguishable from maximisation.**

**That would have implications extending well beyond Archway.**

## 19. Technical improvements do not resolve the fundamental planning conflicts

The September revisions include a number of technical improvements. The revised fire strategy provides two cores to Block A and the PBSA, with evacuation and firefighting lifts and risers, while the biodiversity assessment predicts a **14.59% on-site habitat-unit gain**, above the statutory 10% minimum.

**JAG acknowledges and welcomes these improvements. They demonstrate that aspects of the scheme have responded positively to concerns raised during the planning process.**

They do not, however, address the fundamental issues identified in this response. **The 27-storey tower remains; the scheme continues to conflict with the plan-led approach to tall buildings and the priorities of ARCH5; all 242 PBSA bedrooms remain despite acknowledged PBSA policy conflicts; and the principal heritage and townscape concerns remain unresolved. At the same time, the revised scheme delivers fewer conventional homes and 52 fewer affordable homes.**

**The technical improvements should therefore be given appropriate weight in the planning balance, but they do not overcome the fundamental Development Plan conflicts and identified harms which underpin JAG's objection.**

## Conclusion: The revisions do not overcome the case for refusal

JAG supports the redevelopment of Archway Campus and the delivery of substantial new and genuinely affordable housing, together with an appropriate element of student accommodation. **The objection is not to redevelopment, but to the scale, form and balance of the scheme now proposed.**

The September revisions do not resolve its fundamental planning conflicts. **The 82-metre, 27-storey tower remains on a site which was considered through the Local Plan process but was not identified as suitable for tall buildings.** Islington instead identified three specific tall-building locations elsewhere in Archway, with substantially lower maximum heights. The proposal therefore remains in significant conflict with the plan-led approach to tall buildings established by the adopted Development Plan.

Nor do the revisions strengthen the scheme's contribution to the priority use identified for this site. **ARCH5 expressly prioritises conventional housing, yet conventional homes have fallen from 178 to 167 and affordable homes from 91 to 39 – 52 fewer affordable homes, a reduction of 57% – while all 242 PBSA bedrooms remain.** The applicant also acknowledges non-compliance with important Development Plan requirements relating to nomination arrangements and affordable student accommodation.

The heritage and townscape concerns also remain. Historic England maintained its overall position after considering the amendments and additional visual evidence, including its conclusion that the impacts on the Holborn Union Infirmary Conservation Area remain **"considerable and harmful".** The 27-storey Apex tower remains, together with the identified effects on Grade II* Waterlow Park, Grade I registered Highgate Cemetery and protected views towards St Paul's, and JAG's wider concerns about townscape and visual effects, including from Hampstead Heath.

**The substantial benefits of bringing this long-vacant brownfield site back into use must be recognised. But those benefits should not simply be attributed to the particular scale and form now proposed.** The applicant has itself explored a materially lower-rise development capable of delivering substantial housing and student accommodation, and has not demonstrated that an 82-metre tower is necessary to secure redevelopment of the Campus. Nor does its viability evidence establish that this particular development model is necessary.

**The central question is therefore not whether Archway Campus should be redeveloped, but whether the benefits of this particular scheme justify its conflicts with the Development Plan and the identified heritage, townscape and other harms. JAG considers that they do not.**

**The statutory Development Plan remains the starting point for the Mayor's decision. The September revisions retain the 27-storey tower and all 242 PBSA bedrooms while delivering fewer conventional homes and 52 fewer affordable homes. They do not provide sufficient justification for departing from the Development Plan.**

**JAG therefore asks the Mayor to refuse planning permission.**