Visual evidence for the Archway Campus tower

Summary

The applicant's visual evidence for P2024/2598/FUL consistently understates how visible and dominant the 27-storey, 82m tower would be. The applicant states that Landscape Institute Technical Guidance Note 06/19 (TGN 06/19) have been followed. This is open to question in a number of respects.

Four practices recur across the applicant's views:

- **Wide-angle lens.** Every view is taken at 24mm, which renders the tower at about half the TGN 06/19 reference scale.
- **Viewpoints behind screening.** Cameras are placed where trees, buildings or railings hide the tower, when it is plainly visible a few metres away.
- **Summer foliage.** Several key views were photographed in full leaf, when trees screen the tower for only part of the year.
- **Temporary screening.** In one view the tower is hidden by a scaffold-wrapped building that has since been removed.

The Joint Action Group (JAG) have prepared seven comparison pairs that set the applicant's images beside JAG photographs taken at or near the same positions. In each, the tower has been added as an illustrative montage and its size cross-checked against the applicant's own model.

The GLA should give little weight to the applicant's images as evidence of limited harm, and should require verified views to the TGN 06/19 standard from representative positions, including in winter.

What the guidance requires

The applicant describes its views as Type 4 visualisations prepared in accordance with TGN 06/19 (Environmental Statement Vol. 2, p.122). In several key respects they are not.

Lens and scale

TGN 06/19 makes a 50mm lens on a full-frame camera the standard. Wider lenses are an exception, used only where 50mm "cannot capture the view", tried in sequence (35mm, then 28mm, then 24mm), with reasons documented and agreed with the competent authority (paras 1.1.7 and 4.5.3).

The applicant reverses this. Its methodology states that 24–35mm is "generally used" for local urban views, and 50mm only for open spaces (p.122). Yet even the Waterlow Park views, an open space by its own definition, are at 24mm.

The guidance's own test for needing a wider lens is a development approaching 18° above horizontal (para 1.1.7). An 82m tower reaches that angle only within about 250m of its base at the same ground level, and a level 50mm frame captures the whole tower from about 340m. Every view in this addendum is further away than that, and most are on higher ground.

Scale matters as much as framing. TGN 06/19 defines a 100% reference image: a 50mm photograph printed 390mm wide on A3 (para 3.8.4). It then says that even this understates how large things appear in reality, and sets 150% enlargement as the default for Type 4 work (paras 3.8.6–3.8.7, 4.5.13), with something between 100% and 150% suggested for townscapes (paras 3.8.10, 4.5.16).

Image	Focal length (full-frame equivalent)	Scale relative to the TGN 100% reference
Applicant's views	24mm	about 48%
JAG comparison, View 25	50mm (crop)	100%
JAG comparison, View 24	48mm	about 96%
JAG comparison, most other views	77mm	about 154%
TGN 06/19 Type 4 default	75mm equivalent	150%

At the same print width, the applicant's images show the tower at less than half the reference scale and about a third of the Type 4 default. Scale is only meaningful at the stated print size (para 7.1.3); on screen, where most people will see these images, the tower appears smaller still.

Camera position

The guidance is explicit: "The role of the photographer is to locate the camera such that foreground screening does not obscure the site, unless that is a characteristic of the view / area which is intended to be illustrated" (para 4.1.2). Visualisations must be "objective and unbiased" (para 1.2.2) and give "a fair representation of what would be likely to be seen" (para 1.2.9), using "a reasonable choice" of viewpoints (para 2.3). Baseline photography should "avoid foreground clutter" and be "sufficiently up-to-date to reflect the current baseline situation" (para 2.2).

Seasons

"The illustration of seasonal variations, specifically differences in vegetation cover, should be demonstrated whenever possible ... In particular, instances where key views are available in winter, but not in summer, should be represented" (para 4.1.2, citing GLVIA3 para 6.28). Where a development is hidden, a photowire should show its position and size (para 6.3.2).

Screening by trees is also diminishing. Ash dieback is killing much of the self-sown ash that makes up most of Highgate Cemetery's tree cover, and removal over the next decade will open views further.

How the comparison montages were made

The JAG montages are illustrative, not survey-verified. Those used in this document have been cross-checked against the applicant's own model so that they do not overstate the tower.

Photography. All comparison photographs were taken on an iPhone 14 Pro between February 2023 and December 2024, at or near the applicant's camera positions. Each position was recorded by the

phone's GPS, typically accurate to within about 5m, and compared with the coordinates in the applicant's table of views.

Montage. The tower was added in Photoshop, without access to the applicant's 3D model or wireframes. Position and perspective were judged by eye, which is the main source of possible error.

Cross-checks. Each montage was checked with AI (Claude Opus 5.5) against the applicant's own outline or render for the matching view. The applicant's tower was converted from its 24mm frame to the focal length of the JAG photograph and adjusted for any difference in distance. Where available, existing buildings or a spire visible in both images were used as an independent scale reference. Width, floor height and face proportions were checked, and montages outside about ±10% were redrawn.

Focal length. Most comparison photographs were taken with the iPhone's 77mm-equivalent telephoto camera. This is a separate fixed lens, not digital zoom; TGN 06/19 prefers fixed lenses and advises against zoom lenses (paras 1.1.5, 1.1.8). At the same print width, 77mm corresponds to about 154% of the TGN reference, effectively the 150% default the guidance sets for Type 4 work. It is above the roughly 125% the guidance suggests may suit townscapes, so these images may show the tower slightly larger than that midpoint would. View 24 was taken at 48mm. View 25 is a centred, unresized 50mm-equivalent crop of a 33mm-equivalent photograph (main camera, 1.37× digital zoom), shown at exactly the TGN reference field of view.

Accuracy. Most montages are consistent with the applicant's model to within ±10%. Where they differ, they may show the tower 5–10% taller than the model implies. Each caption gives the result of its own check and a confidence rating.

Viewing. How large the tower looks depends on the image's size and how far away it is viewed. TGN 06/19 assumes A3 prints at arm's length (paras 3.8.3, 7.1.3), but this document will mostly be read on screen or printed at A4, where every image appears smaller. To see an image at roughly life-size scale, view it from the distance shown below, measured as a multiple of the image's width on the screen or page.

Image	Life-size viewing distance	Image 170mm wide (A4 page)	Image 250mm wide (15-inch laptop)
Applicant, 24mm	0.67 × image width	11cm	17cm
JAG, 48–50mm	1.4 × image width	24cm	35cm
JAG, 77mm (landscape)	2.2 × image width	38cm	56cm
JAG, 77mm (portrait)	3.0 × image width	51cm	74cm

On a laptop, the JAG 77mm images are close to life size at a normal viewing distance. The applicant's 24mm images understate the height of the tower in any format. In most cases they would need to be held closer than the eye can focus to represent the tower at its true size. For them to be truly

representative at arms-length viewing distance they would have to be printed at roughly A1 paper size!

Comparison pairs

Many of the applicant's photographs fail TGN 06/19 para 4.1.2, which states that the photographer should "locate the camera such that foreground screening does not obscure the site". Choosing the one spot where the tower is screened, when it is openly visible a few paces away, does not give "a fair representation" (para 1.2.9).

View 07: Parolles Road

Applicant camera: E 529526.806, N 187283.508; 64.66m AOD; 1.60m above ground.





Applicant View 07 (Parolles Road), 24mm, winter. Comparison photograph (recreated Oct 2026) from close to the applicant's position (within a few metres), 11 November 2024, iPhone 14 Pro, 77mm equivalent. In the applicant's photograph the tower is screened by a temporary scaffold-wrapped building, which had been removed by the time of the comparison photograph. TGN para 2.2 requires baseline photography to "be sufficiently up-to-date to reflect the current baseline situation". A view in which a scaffold-wrapped building hides the development doesn't show the lasting situation. Montage illustrative, not survey-verified. Tower scale and position cross-checked against the applicant's own View 07 outline and the spire visible in both images, consistent within ±10%. Confidence: high.

View 24: Waterlow Park

Applicant camera: E 528615.856, N 187061.604; 97.32m AOD; 1.60m above ground.





Applicant View 24 (Waterlow Park), 24mm, summer. Comparison photograph (recreated Oct 2026) from a nearby position (slightly further up the slope but within GPS accuracy), 19 February 2023, iPhone 14 Pro, 48mm equivalent (no digital zoom). Montage illustrative, not survey-verified. Tower scale cross-checked against the applicant's own View 24 render: width within +5% and floor height within +10%. Confidence: high.

View 25: Highgate Hill / The Bank

Applicant camera: E 528804.752, N 187266.619; 105.45m AOD; 1.60m above ground.





Applicant View 25 (Highgate Hill / The Bank), 24mm, in leaf. Comparison photograph from within about 3.5m (within GPS accuracy), 12 February 2023, iPhone 14 Pro, 33mm-equivalent photograph (main camera, 1.37× digital zoom) centre-cropped to 50mm equivalent, matching the TGN 06/19 100% reference field of view (39.6° horizontal). Montage illustrative, not survey-verified. Tower scale cross-checked against the applicant's own View 25 outline and found consistent with the applicant's model to within +10%. Confidence: high.

View 26: Highgate Hill / Cholmeley Park

Applicant camera: E 528672.564, N 187336.898; 115.13m AOD; 1.60m above ground.



Applicant View 26 (Highgate Hill / Cholmeley Park), 24mm, summer. The applicant's summer view conceals what is visible about 55m further down the hill along The Bank, outside Channing School, for much of the year. Comparison (overleaf) taken 21 December 2024, iPhone 14 Pro, 77mm equivalent. Montage illustrative, not survey-verified. Tower scale cross-checked against the applicant's own View 26 outline, adjusted for the shorter distance: width within +7%, height within +10%. Confidence: high.



View 30: Upper Holloway

Applicant camera: E 529777.756, N 186656.391; 43.45m AOD; 1.60m above ground.



Applicant View 30 (Upper Holloway), 24mm, summer. Comparison photograph (overleaf - recreated Oct 2026) from about 75m further south-east on Holloway Road, taken from the centre of the carriageway on the approach to the bridge, 16 February 2023, iPhone 14 Pro, 77mm equivalent. Montage illustrative, not survey-verified. Tower width and face proportions cross-checked against the applicant's own View 30 outline, adjusted for the greater distance; consistent within ±10%. Confidence: medium–high.



View 41: Waterlow Park (new view)

Applicant camera: E 528605.56, N 187154.96; 101.88m AOD; 1.60m above ground.





Applicant View 41 (Waterlow Park, on the path towards the Rose Garden, 24mm, winter. The view was taken in winter, from a spot where the tower sits behind a dense cluster of tree crowns and an evergreen. This is described by the applicant as a "non-verified wireline". Comparison photograph (recreated Oct 2026) about 18m north-east of the applicant's position, 19 February 2023, iPhone 14 Pro, 77mm equivalent. Both photographs were taken with the trees bare. Montage illustrative, not survey-verified. Tower width and orientation cross-checked against the applicant's View 41 wireline, and consistent with tower dimensions derived from the applicant's verified views from Highgate Hill and Waterlow Park (View 24); within ±10%. Confidence: medium–high.

View 45: Archway Bridge (new view)

Applicant camera: E 529128.46, N 187391.91; 100.45m AOD; 1.60m above ground.

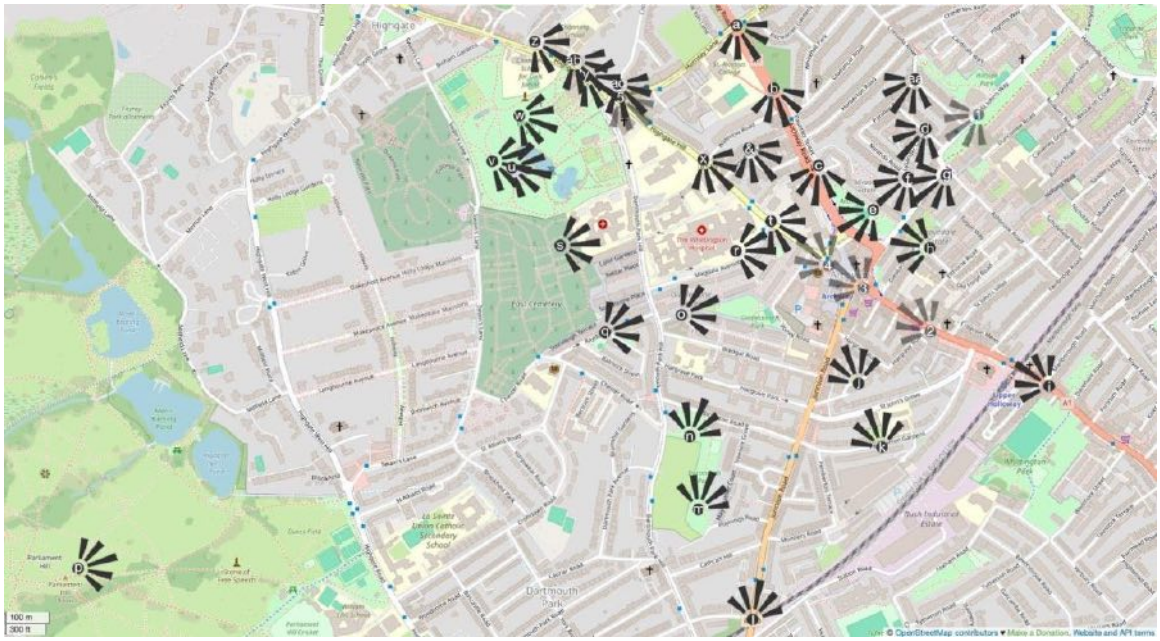


Applicant View 45 (Archway Bridge, Heritage Statement Addendum), 24mm, winter; this updates the applicant's earlier View 10b, taken from close to the same position. Comparison photograph (Overleaf - recreated Oct 2026) with the camera positioned nearby between the bridge rails, 16 February 2023, iPhone 14 Pro, 77mm equivalent. This is listed as Protected View LV5 in the 2023 Islington Local Plan (Archway Bridge to St Paul's Cathedral). Montage illustrative, not survey-verified. Tower width and face proportions cross-checked against the applicant's View 45 render; width within ±5%, height within +10%. Confidence: high.


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Wider JAG montage survey

The seven pairs above are drawn from a wider survey. In 2024 JAG produced a further 23 montages from a range of positions around the site, published at highgatesociety.com/archwaytower. The map below shows every location surveyed.



The tower's negative impact is clear from virtually all of these locations. It is most severe from the northern vantage points in Highgate and Waterlow Park, where the tower would cut across a more distant horizon and thereby change the relationship of Highgate to London by bringing the urban environment much closer, notably because the tower rises above the far horizon from elevated ground as it rises above the highest point in Highgate.

Policy implications

Once the tower's real visibility is shown, it fails the impact tests in London Plan Policy D9 and national heritage policy, as well as the locational test.

Location (London Plan D9, Part B). Tall buildings should be in locations identified as suitable in development plans. Islington assessed Archway Campus and left it out of the neighbouring tall-building area, so the tower conflicts with Policy D9 Part B and with the development plan. That conflict must be weighed under section 38(6) of the Planning and Compulsory Purchase Act 2004, and the scheme's acceptability then turns on the Part C impacts, which the applicant's visual evidence understates.

Impacts (London Plan D9, Part C). The proposal must not adversely affect local or strategic views and must avoid harm to heritage assets and their settings. The applicant's case on these points rests on the visual evidence examined here.

Heritage.

- London Plan Policy HC1 requires heritage assets and their settings to be conserved.
- The NPPF requires great weight to be given to the conservation of designated heritage assets, the more so the more important the asset. Highgate Cemetery is a Grade I registered landscape; Waterlow Park is Grade II*. Long views over London are a designed part of both.
- Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to the setting of listed buildings, including Grade II* Lauderdale House.
- Archway Bridge to St Paul's Cathedral is Protected View LV5 in the 2023 Islington Local Plan (Views 10b and 45).

Standard of evidence. For a tall building in a sensitive heritage setting, TGN 06/19 points to Type 4 verified views and, in "important urban and heritage contexts", high locational accuracy (paras 3.7.3, 4.5.9). Yet the applicant's newer Waterlow Park view (View 41), submitted in the Heritage Statement Addendum, is described as a "non-verified wireline". For a Grade II* registered park, the applicant has relied on a lower standard of evidence than in its main views. This lack is however minor compared to the other failings previously described notably in view location selection.

Public benefit. Any harm must be weighed against public benefits. The revised scheme cuts affordable homes from 91 to 39 while keeping 242 market student rooms.

Policy references should be checked against the current editions of the London Plan, NPPF and Islington Local Plan before submission.

Conclusion and requests

The applicant's images do not give a fair representation of the tower's impact. Wide-angle framing, screened viewpoints, summer foliage and temporary screening all work in the same direction, making the tower look smaller and less visible than it would be.

JAG asks the GLA to:

1. Give little weight to the applicant's 24mm views in assessing visual and heritage harm.
2. Take the comparison images in this a3ddendum into account as evidence of the tower's likely effect.
3. Refuse the application as contrary to London Plan Policies D9 and HC1, the Islington Local Plan and national heritage policy.

Sources

- Landscape Institute, Technical Guidance Note 06/19, Visual Representation of Development Proposals (September 2019; under review since January 2024).
- Applicant's Environmental Statement Vol. 2, Technical Appendices: Accurate Visual Representations (methodology p.122; Views 07, 10b, 24, 25, 26, 30).
- Applicant's Heritage Statement Addendum, Appendix Part 7 (Views 41, 45).
- Highgate Society: Archway Campus, the fight isn't over.
- JAG photomontages, 2024.