The Planning Team
Greater London Authority
City Hall
Kamal Chunchie Way
London
E16 1ZE

Our ref: P01583690

5 October 2025

Dear Sir or Madam,

Town & Country Planning Act 1990 (as amended); Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations"); Town and Country Planning (Development Management Procedure) England Order 2015 (DMPO)

Notification on revised documents for planning application at Archway Campus, 2-10 Highgate Hill, London, N19 5LP - LPA Application No. P2024/2598/FUL

Introduction

Thank you for consulting Historic England regarding revisions to the above planning application for the Archway Campus site ahead of the proposed public hearing.

Historic England previously advised LB Islington on the application for planning permission on 2 December 2024, objecting to the scheme on heritage grounds and recommending that the application be withdrawn in order to consider a more contextual approach to developing the site.

The application was refused by LB Islington on 18 March 2025 but was subsequently recovered on 29 April 2025 by the Mayor of London for his determination.

We provided further advice on 4 September 2025 in response to additional visualisations of the scheme provided by the applicant from agreed locations from Highgate Cemetery (grade I) and Waterlow Park (grade II*). This advice welcomed the additional imagery and confirmed our position regarding heritage impacts identified in our previous advice remained unchanged.

Historic England's Position

Our advice on the significance of heritage assets affected by the scheme and the impact of the proposals on them is set out in detail in our two previous advice letters referred to above.

The latest revisions do not have any material bearing on the instances or level of heritage harm identified in our original advice letters and our overall position regarding the scheme remains unchanged.

Historic England remains supportive of the proposed reuse of the former Holborn Union Infirmary buildings for housing, including repairs and reinstatement of historic detailing. This

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element of the scheme has the potential to deliver a successful housing development in a historic place, in line with our report on ways in which London can progress towards meeting its housing needs - Good Growth, Heritage and Housing, June 2026.

The impacts of the tall building and loss of the former nurses' wing would however have a considerable and harmful impact on the wider Holborn Union Infirmary Conservation Area remain.

The impact on other assets further afield, while more limited, remains unchanged, and will need to be considered and apportioned appropriate weight by the decision maker. These impacts relate primarily to the visibility of the proposed tower on the setting of and views from within two Registered Parks and Gardens on higher ground north of the site: Highgate Cemetery (grade I) and Waterlow Park (grade II*).

Historic England remains deeply concerned by this scheme on heritage grounds on the basis it would lead to multiple instances of harm to designated and non-designated heritage assets which contribute to the special character of the historic environment around Archway and Highgate.

It will be for the Greater London Authority to consider our advice and be persuaded that potential harm identified has been minimised (NPPF HE4, *previously 205*) and that the harm we have identified would be outweighed by public benefits (NPPF HE6 and HE7, *previously 215*).

Yours sincerely,

Benedict Dewfield-Oakley
Inspector of Historic Buildings and Areas
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