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DELEGATED REPORT

Development Management Service
Planning and Development Division
Community Wealth Building

Application number	P2024/2598/FUL
Application type	Full Planning Application
Ward	Junction
Listed building	Adjacent to Grade II listed Whittington Hospital
Conservation area	Holborn Union Infirmary Conservation Area (CA41) Adjacent to St John's Grove Conservation Area (CA28) Within 75m of Whitehall Park Conservation Are (CA7) Within 90m of Highgate Hill/ Hornsey Lane Conservation Area (CA30)
Development Plan Context	Site Allocation (ARCH5) Locally Listed Buildings – Holborn Union Infirmary Local View - LV4 Archway Road to St Paul's Cathedral Local View - LV5 Archway Bridge to St Paul's Cathedral Tree Protection Orders Adjacent to Strategic Cycle Route (Archway Road, Tollhouse Way) Article 4 – Flexible Uses Close proximity to London Underground Infrastructure
Licensing Implications	None
Site Address	Archway Campus, 2-10 Highgate Hill, London, N19 5LP
Proposal	Application for full planning permission in relation to: 1) The change of use, partial demolition, restoration and refurbishment of Holborn Union Main Range, Admin Block and Charterhouse Buildings to provide residential accommodation (Use Class C3). 2) Complete demolition of Furnival Building, Ely Building, Staple Building, and other ancillary structures, to allow for the construction of three new buildings to provide residential accommodation (Use Class C3) and local commercial/community space (Use Class E/F2). 3) The change of use, partial demolition, restoration and refurbishment of Clerkenwell Buildings to provide student accommodation (Use Class Sui Generis). 4) Complete demolition of Nurses Accommodation Buildings to allow for the construction of a new tower to provide for student accommodation (Use Class Sui Generis), and associated structure with basement to provide bicycle storage and amenity space. 5) Delivery of a comprehensive hard and soft landscaping scheme, delivering public realm enhancement to include: a central boulevard, public square, gardens, communal play, and children's play area. 6) Associated access, servicing and plant. (EIA Application) (DEPARTURE FROM THE DEVELOPMENT PLAN)

RECOMMENDATION	It is recommended that the application is **Refused:** 1. For the Reasons for Refusal detailed in Appendix 1; 2. Subject to any direction by the Secretary of State (SoS) to call in the application for determination by the SoS; and/or 3. Subject to any direction by the Mayor of London or for it to be called in for the determination by the Mayor of London	
Report Date	18 March 2025	
Case Officer Signature	Stefan Kukula	
Report Agreed by (Signature)	**Harriet Beattie**	**Date:** 18 March 2025
Authorising Officer Signature	**Nathaniel Baker**	**Date:** 18 March 2025

1. SITE AND SURROUNDINGS

1.1 The site comprises an area of approximately 1.47 hectares and occupies a prominent location to the northern edge of the Archway gyratory. Bounded by Highgate Hill to the west and Archway Road to the east, the site forms a triangular shaped plot tapering to its southern apex and boundary with Tollhouse Way. The site gradually slopes from north to south with the ground level gradient increasing by some 8.7 metres at the northern boundary. The site is currently unoccupied, and the perimeter boundaries are secured by a variety of walls, fencing and locked gates with no public access to the grounds or buildings.

1.2 Originally built as a workhouse infirmary between 1879-1885, the Archway Campus comprises a complex of Victorian and early to late Twentieth Century hospital, administration and staff accommodation buildings. In 1948 the site became the Archway Wing of the neighbouring Whittington Hospital. In 1998 the site was purchased from the NHS by Middlesex University and University College London and used as a medical teaching campus until 2013. It was then sold in 2014. The site has subsequently been vacant since 2013, with the exception of an unauthorised change of use which ceased in 2016.

1.3 The entire site was designated as the Holborn Union Infirmary Conservation Area (CA41) in September 2013 and the Holborn Union Infirmary (CA41) Conservation Area Statement was published in March 2014. The conservation area is considered to be 'At Risk' and is on Historic England's Heritage at Risk Register.

1.4 There are no statutory listed buildings on the site, but the original infirmary buildings are locally listed non-designated heritage assets. This includes the five storey Holborn Union main range with its landmark central tower and two storey administration block fronting Archway Road. The main range is flanked on either side by two wing buildings: the five storey Charterhouse to the north, and four storey Clerkenwell to the south. Adjacent to the southern flank of the Clerkenwell building, the three storey former Nurses Accommodation Wing occupies part of the southern apex of the site. The Staples building, a single storey former laundry and workshop, lies to the northern edge of the site.

1.5 At the time of writing this report Historic England is undertaking an assessment of the site to consider if some or all of the buildings should be statutorily listed. A recommendation will then be made to the Department for Digital, Culture, Media & Sport. A determination on the statutory listing has not been made at this time.

1.6 There are four modern buildings on site: the eight storey Furnival Building built in the 1970s; the three storey 1980s Ely building; a single storey portacabin; and a two-storey extension to the Clerkenwell wing building built in the 1980s. There are also a number of later extensions and additions to the main historic buildings including stairs, lifts, toilets and veranda structures.

1.7 The site retains areas of open space with 11 mature London plane trees to the western boundary with Highgate Hill, which are protected by a Tree Preservation Order. There are also four mature London plane trees to the Archway Road side of the site, set back from the boundary wall and adjacent to the southern element of the administration block. All of the trees on site are protected by virtue of their inclusion in the Holborn Union Infirmary Conservation Area.

1.8 The site is bounded by a wall and perimeter fence and whilst there is pedestrian access into the site there are no public routes into or through the site. There is an existing vehicular access point from Highgate Hill and two existing vehicular access points from Archway Road, which are linked by a servicing road running east to west through the northern part of the site. Pedestrian access to the site is possible via the existing vehicular access point on the Highgate Hill side and via a separate pedestrian access gate and ramp leading to the Furnival Building. In addition, there are two separate pedestrian access gates in the boundary wall/railings further down the Highgate Hill boundary, both involving stepped access with Heras fencing and hoarding in place to prevent trespassers.

1.9 Residential properties bound the site to the north, including terraced housing on Lidyard Road, flats at The Academy - a complex of converted former school buildings, including The Cottage (the former care takers' cottage) and The Barn (a converted former outbuilding) - on Highgate Hill and flats at Whitehall Mansions, which lies on the junction of Lidyard Road and Archway Road. Further to the north west is the Highgate Hill/Hornsey Lane Conservation Area. The Whittington Hospital site, part of which is subject to a Grade II listing, is located to the west of the site on the opposite side of Highgate Hill along with residential properties at Magdala Avenue and Annesley Walk. Archway

Heights, a nine-storey residential block, and Archway Park, which is designated as a Site of Importance for Nature Conservation (SINC) are located to the east of the site on the opposite side of the Archway Road.

1.10 The St John's Grove Conservation Area, Archway Town Centre and the locally listed Archway Tavern public house set within an area of pedestrianised public realm at Navigator Square lie on the opposite side of Tollhouse Way to the south of the site.

1.11 The site is subject to Site Allocation ARCH5 in the Islington Site Allocations document (2023) for residential led development with some commercial, community and social infrastructure uses.

1.12 Designated local views LV4 and LV5 pass through part of the site. Local View LV4 from Archway Road to St Paul's Cathedral crosses the southern part of the eastern boundary of the site with Archway Road. Local View LV5 from Archway Bridge to St Paul's Cathedral covers a broad strip through the eastern part of the site, including the eastern sections of the Charterhouse and Clerkenwell and Nurses wing buildings and the Main Range administration block.

1.13 The site has a Public Transport Accessibility Level (PTAL) rating of 6(b) and 6(a) (on a scale of 1 to 6 where 1 represents the lowest levels of accessibility to public transport and 6 the highest). The 6(b) PTAL rating relates to the southern part of the site and the 6(a) PTAL rating relates to the northern part of the site.

1.14 The site lies within 15 metres of a section of tunnel for the London Underground's Northern Line service between Archway and Highgate, which runs adjacent to the east of the site underneath Archway Road.

2 SITE PLAN



Figure 1: Site Location - the application site boundary is outlined in red

3 PHOTOS OF SITE/STREET



Figure 2: Existing aerial photo of the site



Figure 3: Aerial view of the site looking west



Figure 4: Aerial view of the site looking east



Figure 5: Southern apex of the site and nurses wing looking north east from Navigator Square



Figure 6: Western (rear) elevation of the Holborn Union Main Range building, looking north east from Highgate Hill



Figure 7: Site boundary to Highgate Hill, looking south east towards Tollhouse Way



Figure 8: Existing vehicular access point to the site from Highgate Hill



Figure 9: Flank elevation of Furnival Building, looking east from Highgate Hill



Figure 10: The Furnival building, looking south from The Academy (neighbouring residential building)



Figure 11: Northern elevations of the Ely building (left) and Furnvial building (right) and access road across the northern part of the site – looking west from the northern boundary of the site



Figure 12: The Charterhouse building, looking north west from Archway Road



Figure 13: Existing vehicular access points to the site from Archway Road



Figure 14: Holborn Union Main Range and Front Range (admin block) looking west from Archway Road



Figure 15: Holborn Union Main Range (right) and Clerkenwell building (left), looking north west from Archway Road



Figure 16: The Clerkenwell wing building (centre), southern flank of the nurses wing (left) and southern bounary wall, looking north from Tollhouse Way



Figure 17: The Nurses Accomodation Wing, looking north from Tollhouse Way

4 PROPOSAL

4.1 The application seeks planning permission for a total of 178 new homes, including 91 affordable homes and 87 market sale homes. The affordable homes would be provided through the construction of 3 new purpose-built housing blocks, known as Blocks A, B and C, to the Highgate Hill side of the site. The market sale housing would be delivered through the partial conversion and extension of the principal historic Holborn Union main range building, Admin block and Charterhouse wing building.

4.2 A total of 242 new self-contained student accommodation studios would be provided at the southern apex of the site through the construction of a 27 storey (82m in height) tower, including 210 student accommodation studios, alongside the partial conversion of the historic Charterhouse wing building to create a further 32 student accommodation studios. A separate three storey student amenity building comprising basement cycle parking, ground floor lobby, and a 104 sqm amenity space at first-floor, would be constructed on the southeast corner of the site.

4.3 At the ground floor of Block C, an 88 sqm double height commercial unit would be provided seeking a flexible use under Use Class E (Commercial, Business and Service) and Use Class F2 (Local Community Uses).

4.4 A comprehensive hard and soft landscaping scheme across the site would include a public square, a formal garden, a children's play area and areas of communal play. The central boulevard, to be known as Holborn Avenue, would be the main north/south link through the site, providing a pedestrian only route, aside from refuse collection and emergency vehicle access.

4.5 In terms of vehicular access, it is intended that vehicles would enter the site from Archway Road to the east and then exit the site from Highgate Hill to the west with the proposal utilising the site's existing access points from Archway Road and Highgate Hill. A servicing road, to be known as Charterhouse Way would be the main east to west route through the site and would be used by pedestrians and delivery vehicles, incorporating two servicing bays. A third servicing bay is proposed to be provided outside of the site on Highgate Hill, which would require the relocation of a bus stop (Archway Station - Stop C) some 13m north along Highgate Hill.

4.6 It is proposed that refuse collection would be undertaken on site and from Highgate Hill. A refuse collection vehicle would access the site from the access on Archway Road and route through the site. Refuse vehicles would be granted access to the traffic free central spine road and travel in an anticlockwise direction around the loop road within the site.

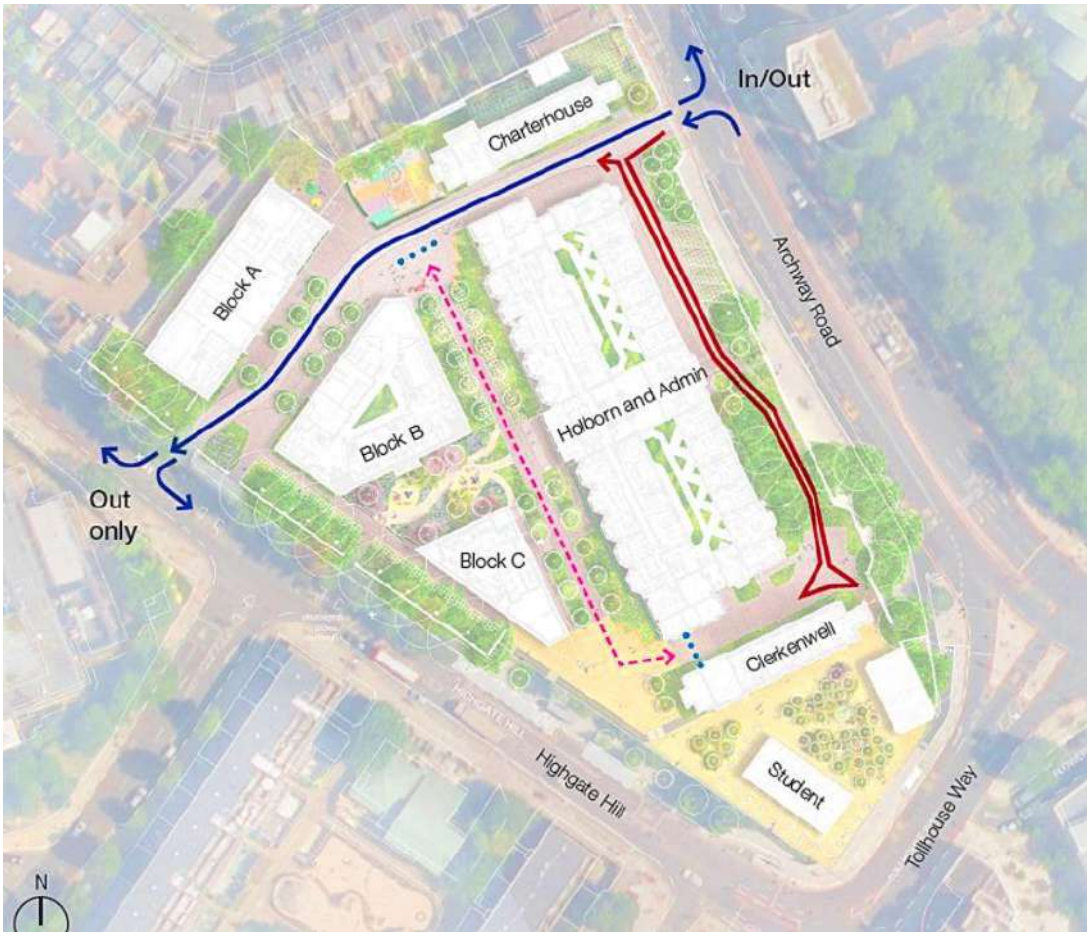


Figure 18: Proposed site layout, indicating the proposed vehicle access routes



Figure 19: CGI aerial visualisation of the proposed site looking north-east

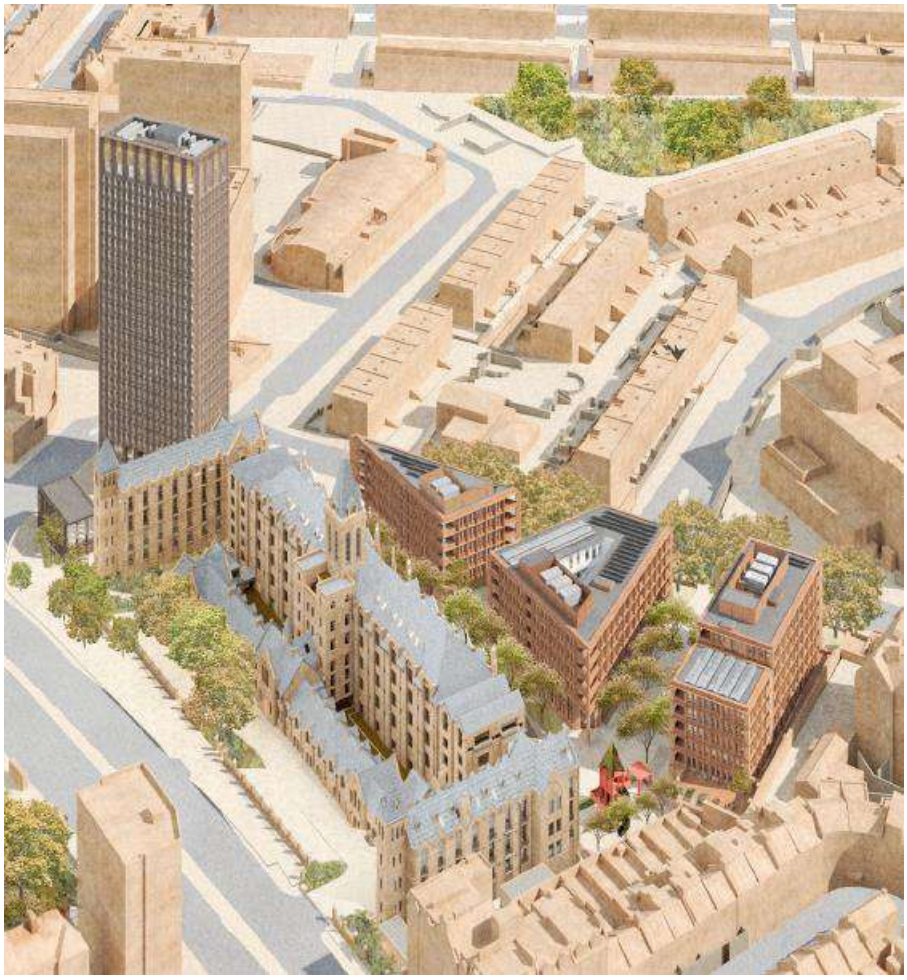


Figure 20: CGI aerial visualisation of the proposed site looking south-west

Affordable Housing

4.7 The affordable housing offer comprises 51% of the proposed conventional dwellings, equating to 91 homes. The affordable offer tenure is split into 64% (58 homes) social rented housing and 36% (33 units) intermediate, comprising London Living Rent tenure proposed in perpetuity.

4.8 The proposed affordable homes would be provided across three new housing blocks to the west of the retained main range Holborn Union complex. The new buildings are referred to as Block A (the northernmost building), Block B (the central building) and Block C (the southernmost building). Block A would be 7 storeys in height, whilst B and C would be 6 storeys in height. The new affordable housing blocks would replace the locally listed Staples Building, the 1970s Furnival Building and a dilapidated single-storey portacabin structure.

4.9 The table below provides a breakdown of the proposed affordable home mix in each of the proposed new buildings:

	BLOCK A	BLOCK B	BLOCK C	TOTAL	% of homes
Studio	5	0	0	5	6%
1 Bed	28	23	1	52	57%
2 Bed	0	15	8	23	25%
3 Bed	1	3	5	9	10%

4 Bed	2	0	0	2	2%
TOTAL	**36**	**41**	**14**	**91**	

Social Rented
Intermediate/ Keyworker

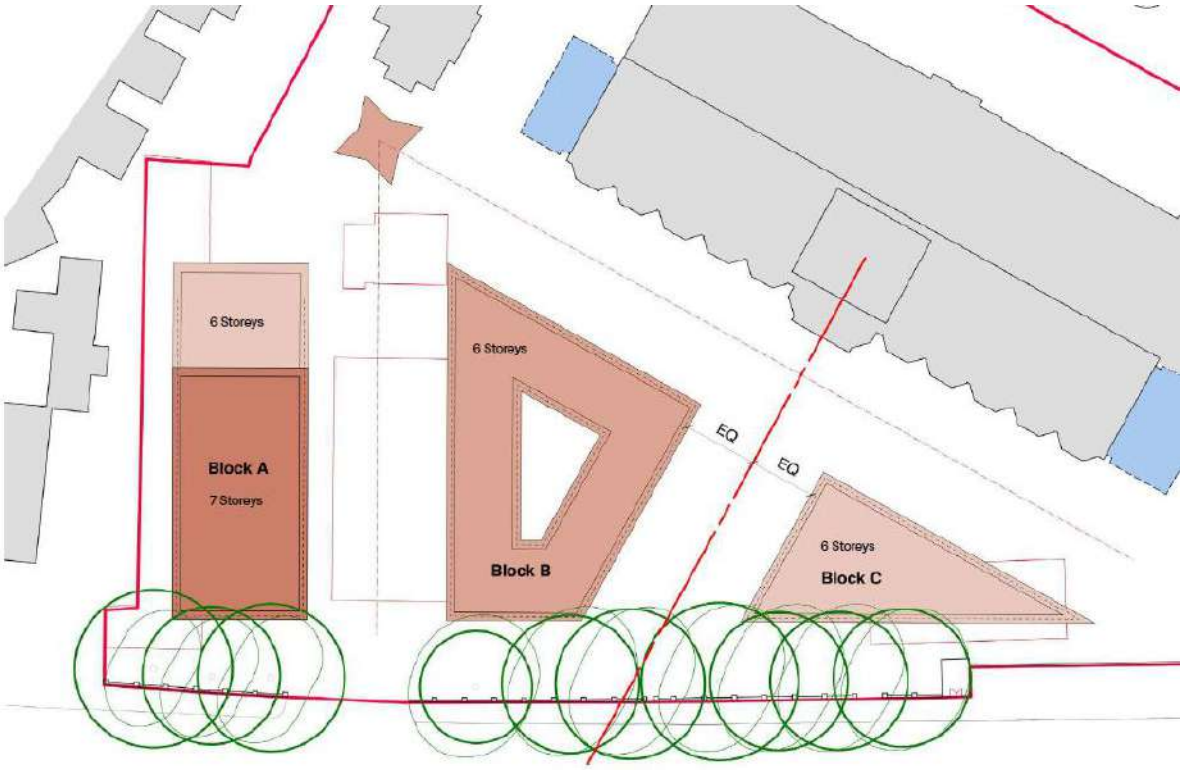


Figure 21: Indicative proposed site layout of affordable housing blocks



Figure 22: Proposed south-west facing elevations of the affordable housing blocks from Highgate Hill

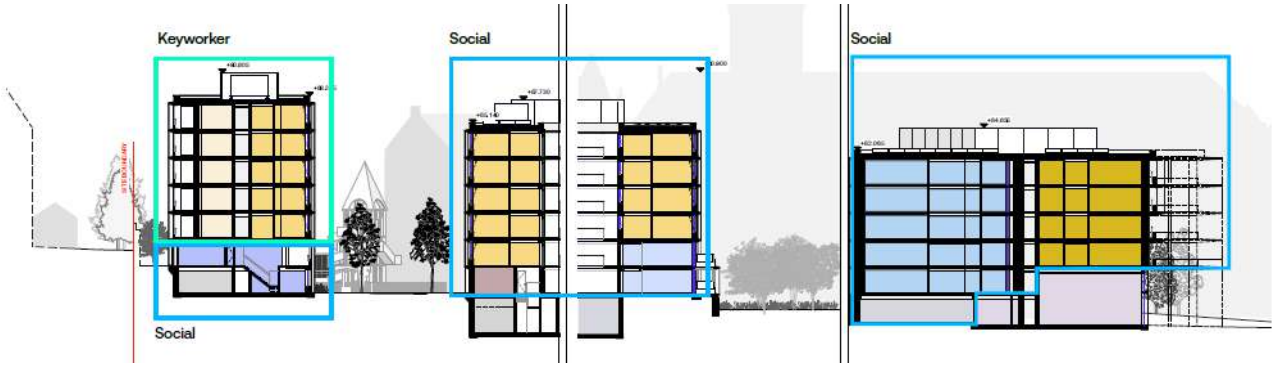


Figure 23: Section through the proposed affordable housing blocks

Figure 24: Proposed site layout of affordable housing blocks A, B, and C and student accommodation tower



Figure 24: South elevation of Block A (top) and visualisation of Block A from Highgate Hill (bottom)

Figure 25: Visualisation of the main entrance to affordable housing Block A

Figure 26: Visualisation of Blocks A and B from Highgate Hill with play structure and gable of Charterhouse Wing in the background



Figure 27: Block B Northeast Elevation and visualisation of Block B from Highgate Hill



Figure 28: Visualisation of Block B deck access and lightwell



Figure 29: Visualisation of the approach from Navigator Square with Block C (left), the historic main range (centre) and the base of the Student Accommodation tower (right)

Figure 30: Visualisation of the central spine with Block C (left) and the historic main range (right)

Market Housing

4.10 In respect of market homes, 87 new homes are proposed for sale and would be provided within the historic buildings.

4.11 The facades of the Main Range building would be retained with new internal floors constructed within the shell of the original building to provide 61no. apartments. The submission is not explicit in noting whether the existing roof would be retained or removed and reinstated. The end pavilions would be demolished and rebuilt and other modern additions would be removed from the exterior of the historic building. The submission is not clear as to whether the roof of the building would be removed and rebuilt or whether it would be maintained in situ, with contradictory plans details various aspects. Some documents refer to investigative work needing to be undertaken. Were the application to be recommended for approval this would be required to be clarified.

4.12 The facades of the Administration building would be retained with new internal floors constructed within the shell of the original building, providing 15 three storey terraced houses. The properties would utilise the existing loft space and include individual front-door entrances facing towards Archway Road. A new extension would also be constructed at the northern end of the Administration building to accommodate an additional self-contained unit. As with the Main Range, the status of the roof has not been confirmed.

4.13 The Charterhouse Building would provide 11 apartments over four new floors of residential accommodation and would include a new internal core with stairs and two lifts. Rooflights are proposed to facilitate duplex flats in the loft space. A new entrance and level threshold is also proposed utilising existing voids at ground floor. A service space including bin and cycle stores would be provided. Modern additions to the building, including an external fire escape, would be removed from the exterior.

4.14 The table below provides a breakdown of the proposed market housing unit mix by building:

	HOLBORN UNION	CHARTER-HOUSE	ADMIN BLOCK	TOTAL	% of units
Studio	0	0	0	0	0%
1 Bed	19	4	0	23	26%
2 Bed	21	5	2	28	32%
3 Bed	20	1	12	33	38%
4 Bed	1	1	1	3	4%
TOTAL	**61**	**11**	**15**	**87**	



Figure 31: Existing Holborn Union west elevation (top) and proposed Holborn Union west elevation (bottom)



Figure 32: Main Range and Admin Block: Existing section (left) and proposed section (right)

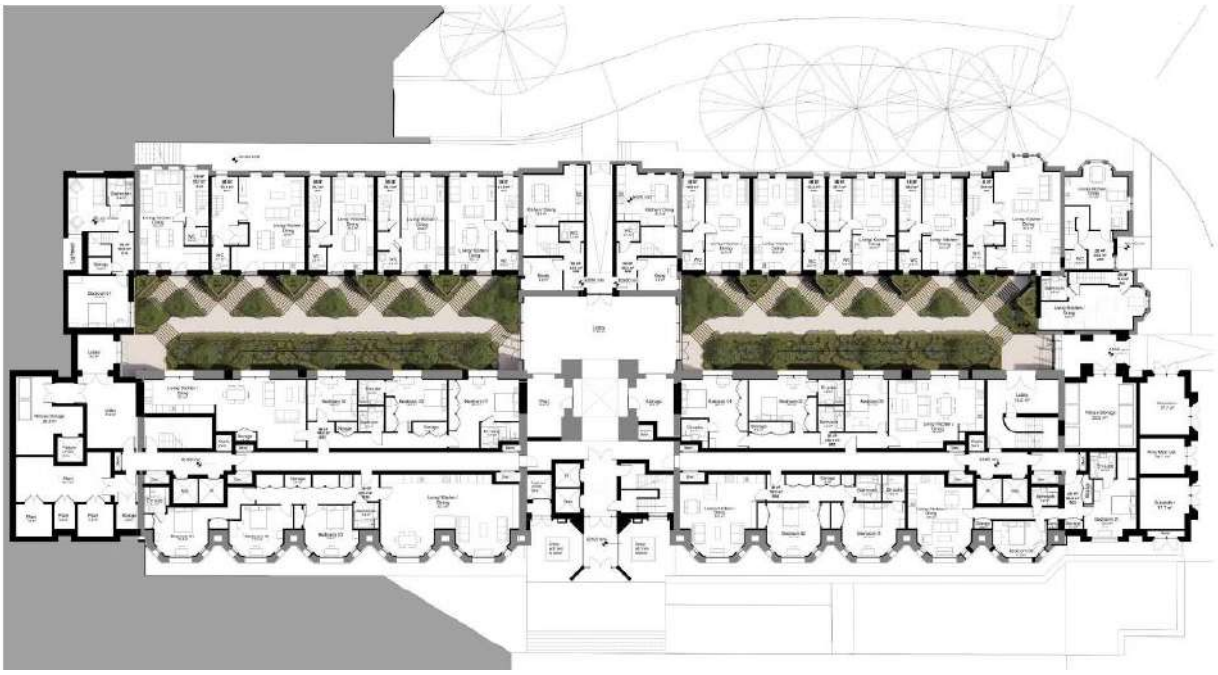


Figure 33: Main Range and Admin Block: Proposed ground floor layout



Figure 34: Admin Block: Existing and proposed front elevation (facing east to Archway Road)

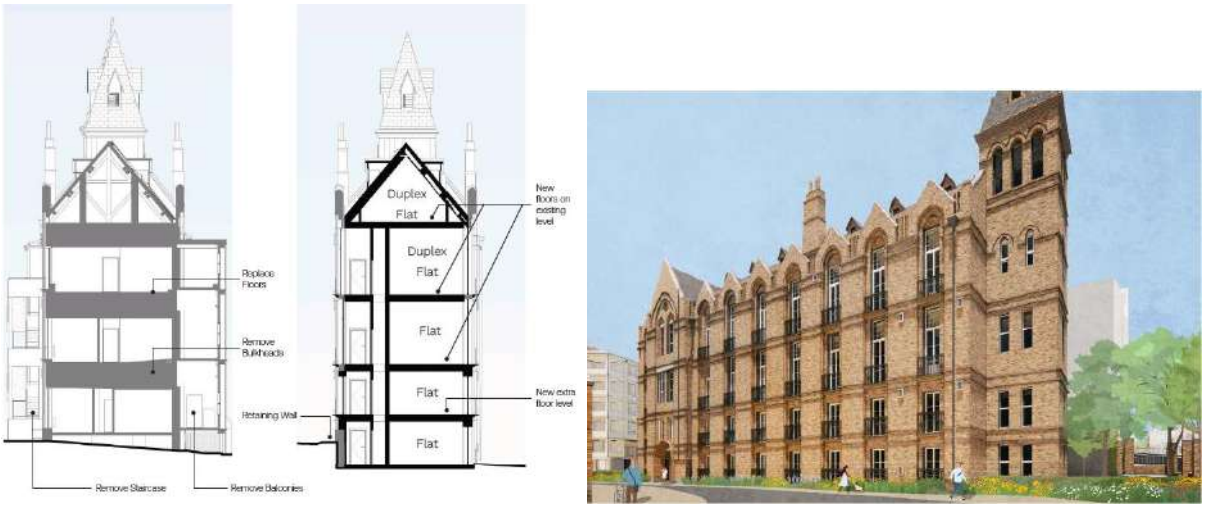


Figure 35: Charterhouse: Existing and proposed sections (left) and visualisation of proposed southern elevation

Student Accommodation

4.15 A total of 242 self-contained student accommodation studios would be provided along with associated facilities and student amenity spaces. The Purpose-Built Student Accommodation (PBSA) would be located at the southern apex of the site, involving the demolition of the historic nurses' wing, and would comprise of three main elements:

- A student accommodation tower – a new 27 storey/24 floor/ 82 metres tall building, providing 210 studios, arranged with 10 studios per floor; a basement which would accommodate a gym, cinema, bin store and plant room; a ground floor which would provide a lobby and café; a first floor study area and lounge; a top floor communal dining area; and roof space to accommodate the remaining plant.

- A student amenity building – a new three storey building located to the west of the new tower, providing a ground floor lobby, first floor amenity space and basement level cycle parking.

4.16 The conversion of the historic Clerkenwell wing building into student accommodation, providing 32 studios over 4 upper level floors, with the ground floor providing a student amenity space, bin store and lobby.

4.17 The proposal does not include any affordable student accommodation, and all 242 bedrooms would be delivered as market units.

4.18 The proposed introduction of a tall building to the site, which is not allocated for a tall building, represents a departure from the development plan.



Figure 36: Proposed site elevation from Highgate Hill



Figure 37: Visualisation of proposed Block A and student accommodation tower, looking south along Highgate Hill



Figure 38: Visualisation of proposed student accommodation tower, looking north from Junction Road



Figure 39: Visualisation of the proposed student accommodation tower looking east from MacDonald Road



Figure 39a: Diagram showing the sectional arrangement of the proposed student accommodation tower



Figure 40: Visualisation of Clerkenwell Square, with the Clerkenwell building (centre), the base of the Student Accommodation tower (left) and student amenity building (right)

Figure 41: Visualisation of the terrace facing onto Highgate Hill with the southern pavilion extension to the Main Range, west elevation of the Clerkenwell building and the base of the student accommodation tower

Landscaping and Public Realm

4.19 There are significant level changes across the existing site and the landscape masterplan sets out that the proposed site is to be re-profiled to create a more cohesive ground plane. This would result in a surplus volume of circa 15,000m3 of site-won material that will need to be removed from the site.

4.20 The landscape and public realm across the site would be designed with different character areas as set out on the diagram below. To the southwest this would include a sequence of public spaces, seating areas, planting and new trees. There would be a level change between the two spaces that together form the Holborn Terrace, which would include steps.

4.21 The main north/south link route through the spine of the site would be lined with trees on either side and is intended as a pedestrian route but will be shared with refuse collection vehicles and emergency vehicle access.

4.22 Charterhouse Way would form the main east to west serving route for delivery vehicles, and includes two loading bays, one between Holborn and Charterhouse and the other adjacent to block B alongside two accessible parking bays. Charterhouse Way would include flush kerbs in a contrasting colour with the paving to facilitate pedestrian access and movement across the road. 'Rain gardens' and tree planting between blocks A and B would be provided along the roads when entering the site from Highgate Hill.

4.23 The mature plane trees along Highgate Hill would be retained and a route beneath the existing trees provided with planting and play on the way features edging the path. This would connect the public space at Holborn Terrace and Charterhouse Way.

4.24 A landscaped garden would be provided between Block B and Block C with a path aligning with the Holborn Union building's spire, with two play spaces set off the central path. According to the Landscape Statement the garden would provide seasonal planting, multi-stemmed trees and habitat for bees and invertebrates.

4.25 On the eastern edge of the site running parallel to Archway Road, a pedestrian and vehicular route with 7 blue badge parking bays would be provided. The mature trees would be retained and the new planting is introduced to soften this edge of the site. The route would be used by refuse vehicles doing a one-way loop through Holborn Avenue and exiting onto Highgate Hill.

4.26 The landscape design would include semi-private internal courtyards between the Holborn Building and the Administration Buildings and at Block B. A shared mews terrace would be provided to the north of block A.

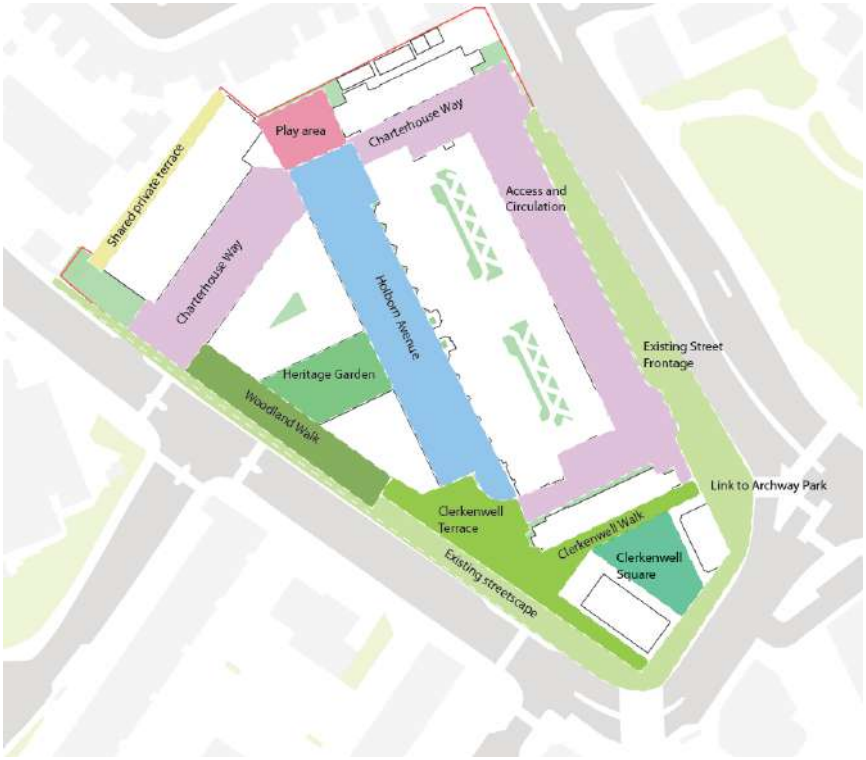


Figure 42: Proposed landscape and public realm character areas



Figure 43: Proposed site layout, public realm and landscaping



Figure 44: Visualisation of proposed Holborn Terrace with Block C (left) Holborn Union building (centre) and Clerkenwell (right)



Figure 45: Visualisation of proposed view looking north along Holborn Way towards Charterhouse play space



Figure 46: Visualisation of proposed view looking north towards Block B



Figure 47: Visualisation of proposed formal garden between Block B (left) and C (right) looking east towards the Holborn Union building

5 RELEVANT HISTORY:

Relevant Planning Applications

5.1 The relevant recent and historic planning applications relating to the site are listed below:

- **P2022/4011/FUL**: Temporary change of use of existing buildings to non-residential artists studios and exhibition space (Sui Generis) for a period of 5 years - Appeal against Non-determination **Dismissed**: 09/05/2024

  The planning balance and conclusions from the Planning Inspectorate's decision to dismiss the appeal were set out as follows:

  "80. The appeal scheme would bring harms in terms of delay to housing delivery and development plan conflict, potential issues with fire safety and the potential reduction of CIL contribution which together carry substantial weight against it.

  81. Balanced against these harms, it is clear that the proposed MU would bring positive benefits in terms of economic and cultural activities resulting in additional employment and economic value. The occupation of buildings within a Conservation Area listed on the Historic England Heritage at Risk Register is a benefit. Nevertheless, the period would be limited with just the facades retained for permanent use. I also acknowledge that the provision of artists' studios to meet a demand is a positive benefit. However, I attribute little weight to that benefit given the period of MU and the scale of need. These various identified short-term benefits taken together carry modest comparative weight in favour of the appeal proposal.

  82. Consequently, the adverse impacts of the proposed development significantly and demonstrably outweigh the benefits. Furthermore, I concur with the Council that even ignoring the CIL issue the planning balance is decisively against permission being granted. On that basis, the appeal scheme is dismissed."

- **P030139**: Erection of a one storey flammable goods store - **Approved**: 01/07/2003

- **992633**: Demolition of an existing store and construction of a single storey building to provide a cafeteria at lower ground floor level - **Approved**: 23/02/2000

- **880325**: Formation of new vehicular access - **Approved**: 12/09/1988

- **841740**: Construction of two extensions to house fire escape staircases - **Approved**: 20/02/1985

- **820121**: Erection of two lift towers linked by a five-storey extension to provide kitchens at 1st 2nd and 3rd floor level and a new receiving ward at ground level adjoining the existing central tower - Approved: 10/11/1982

Environmental Impact Assessment Screening

5.2 There have been several Environmental Impact Assessment Screening applications relating to the site, which are listed as follows:

- **P2017/3819/EIA**: Request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as to whether the following proposals constitute Environmental Impact Assessment (EIA) development: Redevelopment of the site, including demolition of buildings, retention and conversion of others, and erection of buildings of 2 to 20 storeys, to accommodate 308 residential units and up to 1,524sqm of D1 floorspace, together with associated landscaping works - **Decision: EIA not required**.

- **P2015/4600/EIA**: Request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) as to whether the following proposals constitute Environmental Impact Assessment (EIA) development: Demolition of buildings to north of site, erection of new buildings and conversion of remaining

existing buildings to create 331 dwellings and up to 2,000 sq m of non-residential floorspace (use class A1 and D1) - **Decision: EIA not required**.

- **P2015/4589/EIA**: Request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) as to whether the following proposals constitute Environmental Impact Assessment (EIA) development: Demolition of buildings to north and south of site, erection of new buildings and conversion of remaining existing buildings to create 365 dwellings and up to 2,000 sqm of non-residential floors pace (use class A1 and D1) - **Decision: EIA not required**.

Planning Enforcement

- **E/2015/0113**: Unauthorised change of use. Following discussions with the freeholder of the land, the unauthorised use of the land ceased and the breach was remedied – **Case Closed**: 05/02/2016 with no enforcement action. As a result, reversion to the former lawful use is no longer possible without planning permission.

6 PRE-APPLICATION ADVICE

6.1 Prior to the submission of the planning application, the Council and current applicant engaged in pre-application discussions (reference: Q2021/3313/MJR) from November 2021 until early 2024 through a formal Planning Performance Agreement (PPA), with officers seeking solutions to a range of complex development, design, heritage and policy issues.

6.2 As the discussions progressed the various iterations of the proposals gradually reduced in scale and quantum. However, at the final stages of the pre-application process officers maintained significant concerns in relation to the proposal's impact on heritage assets, the quality of the proposed homes and living environment, the extent of student accommodation and the height and massing of the proposed apex tower. It was also highlighted that in depth discussions were still required on energy and sustainable design and construction matters as well as transport and highways considerations. Consequently, a number of key issues remained unresolved prior to the submission of the current planning application.

Design Review Panel (DRP)

6.3 An earlier iteration of the proposal was presented to the DRP on 23 February 2023. A revised proposal similar to the current application scheme was presented the DRP on 23 January 2024. The key changes from the first to second DRP involved: the expansion of the 'student quarter' at the southern apex of the site to include the Clerkenwell Building; a reduction in the height of the apex student tower, and; a reduction in the overall quantum of residential accommodation from 250 homes to 198 homes and a reduction in student accommodation from 250 studios to 242 studios.

6.4 The DRP advised that it maintained its support for the principles of the masterplan and the associated urban form which are considered of merit. The landscaping was also commended as was the architectural quality. There was also support among the Panel for the height and massing of the three social housing blocks and their architectural expression.

6.5 With regards to the tower, the Panel welcomed the reduction in height (from 93m to 82m) but was disappointed with the views analysis work, which it considered incomplete. This limited the Panel's ability to fully appraise the impact of the tower, particularly from the longer views and settings and the critical LV5a view. While the architecture of the tower was supported in principle and close up views considered successful, the impact of the tower on the townscape and broader setting remained untested in key views and therefore could not be fully considered by the Panel. The Panel advised to test the tower with the reduction of a 3 further 'middle' floors. By reducing its height, the Panel advised, that the tower would sit more comfortably in relation to the setting of heritage assets.

6.6 A lack of definitive technical information relating to the microclimatic impacts associated with the tower was noted, although the positive trajectory of the proposal was commended. The Panel reiterated the importance of assessing the tower in relation to these two elements – views and microclimatic conditions - going forward.

6.7 The approach to the historic buildings was supported in principle including the treatment of the proposed 'book ends' but again the Panel was disappointed that the scheme is at an architecturally

advanced but without the benefit of full structural survey information and analysis to substantiate the design.

7 CONSULTATION

Public Consultation

7.1 On 11 October 2024 consultation letters were sent to the occupants of 1,685 adjoining and nearby properties including: Annesley Walk, Archway Road, Calvert Court, Despard Road, Flowers Mews, Giesbach Road, Girdlestone Walk, Gordon Close, Harberton Road, Hargrave Road, Henfield Close, Highgate Hill, Holloway Road, Junction Road, Levison Way, Lidyard Road, Macdonald Road, Magdala Avenue, Miranda Road, Navigator Square, Pauntley Street, Salisbury Walk, St John's Way, Vorley Road, Waterlow Road, Whitehall Park and Windermere Road.

7.2 Seven site notices were displayed in various locations around the site on 11 October 2024 and a press advert was published. The application was advertised as EIA development and as a Departure from the Development Plan.

7.3 The public consultation expired on 3 November 2024, however it is the Council's practice to continue to consider representations made up until the date of a decision.

7.4 At the time of the writing of this report over 450 comments had been received from the public with regard to the application. The vast majority of the comments set out objections to the proposal. While some of the responses are broadly supportive of bringing the vacant campus site back into use by providing much needed new housing in Archway (in particular affordable housing), most comments raise very strong concerns with regard to the scale, height and design of the proposed apex tower as well as its visual and environmental impact. In addition, a high number of the comments raise concerns with the introduction of student accommodation instead of providing conventional housing for local people. The main issues raised by the public can be summarised as follows (with the paragraphs that provides responses to each issue indicated within brackets).

Objections:

Land Use

- Site not allocated for student housing
- Tall building not in a location identified as suitable in the Local Development Plan

Housing

- Affordable housing offer does not align with the demonstrable need for family sized homes in the area.
- Limited provision of genuinely affordable housing
- Affordable housing should be for social rent
- Incorrect calculation for affordable housing
- Should not be aimed at / no need for international student housing, need is for family housing
- Affordable housing is not tenure blind
- Seven Capital has no nomination agreement with a higher education provider
- Too many studio and one bedroom homes
- Questions raised whether student housing is feasible given recent 40% decline in the number of international students taking up places at UK universities

Design and Conservation

- Objection to the size, height and massing
- Objection to visual appearance
- Proposal creates a damaging landmark
- Out of keeping and at odds with character of the area
- Tall building will dominate surroundings
- Adverse effect on openness and views (particularly including Hampstead Heath, Kenwood and Parliament Hill)
- Would set a precedent for further tall towers

- Harm to heritage assets - including Conservation Areas and Grade I, II and II* listed gardens, parks and buildings and locally listed buildings.
- Unsightly appearance
- Poor design quality
- Excessive density
- Unsympathetic to the original buildings
- Accommodation could be provided in a lower building
- Insufficient public benefits Object to demolition of beautiful buildings

Neighbouring Amenity

- Overshadowing
- Adverse daylight and sunlight impacts
- Loss of privacy
- Noise disturbance from occupants and construction

Future Occupier Amenity

- Too many single aspect flats
- Poor outlook
- Unacceptable light levels
- Internal overlooking and poor levels of privacy
- Poor open space provision and quality
- Insufficient and inadequate play space

Environment and Sustainability

- Fails to comply with Biodiversity Net Gain requirements and off-site offsetting is unacceptable
- Green roof viability questioned
- Would cause a large and unjustifiable quantity of carbon dioxide equivalent emissions
- Creates dangerous wind impacts / tunnels.
- Tower is difficult to ventilate naturally
- Tower expensive to maintain
- Loss of possible roosting space for bats (have been many local sightings of bats over the years)
- Impacts air quality
- Missing a major opportunity for enhanced biodiversity and nature recovery
- Insufficient replanting
- Objects to removal of trees and concerns about the impact on retained trees
- Feasibility studies for reusing existing buildings should be published

Transport / Infrastructure

- Highway safety from construction traffic
- Create significant pressure on local services, including public transport, healthcare facilities, and public amenities

Other

- Support for low rise, option
- Confusing and contradictory information within the submission
- Students do not contribute to Council Tax
- Should also be designed to complement the Safer Neighbourhood plan for the area
- Developer has received a number of complaints about disrepair and poor maintenance
- Ownership unclear
- Creates anti-social problems

Procedural

- Many unrepresentative views of the tower provided
- Misleading consultation description with reference to height of tower

Consultation

- Proposal as submitted was not consulted on prior to submission, therefore, community engagement on this scheme has not taken place

Support:

- Green spaces welcome
- Supports that this site is finally being developed
- Supports that many of the original buildings are being kept
- Will help meet housing targets
- Affordable rent housing is welcomed
- Tower thoughtfully placed at the bottom of the site
- Act as a beacon and bring a dead site alive
- Could revitalise the area
- No alternative
- Regeneration of the Gyratory and Town Centre in 2017 proves how successful and valuable these developments can be despite initial opposition
- Student housing will relieve pressure on housing in the surrounding area

7.5 In addition to the representations noted above, the following responses have been received from local resident groups, organisations and societies:

7.6 **Archway Campus Joint Action Group:** Joint Action Group ("JAG") is made up of the following organisations: - The Academy Residents - Barrangreen Property Management (The Academy, Highgate Hill) - Despard Road Residents - Friends of Waterlow Park - The Heath and Hampstead Society - The Highgate Conservation Area Advisory Committee - The Highgate Society - The Islington Society - Lidyard Road Residents - The Waterlow Trust Park Advisory Group - Waterlow Road Residents - Whitehall Park Residents Association.

- The developer's figure of 51% affordable housing is achieved by excluding the student housing, by the provision of large number of 1 bed and studio units and counting units rather than bedspaces. - Of the affordable housing to be provided, it is clear that this does not meet either housing policy or local need either as percentage of total or mix.
- In terms of mix, including the student housing, 76.4% of the site is being developed as studio or 1 bed units when there is a demonstrable need for family units on this site. - The high number of small units increases the percentage figures of affordable housing when calculated by this method rather than bed spaces. The high number of small units inflates the perceived amount of affordable housing being provided rather than reflecting the number of bedspaces being provided. –
- 100% of intermediate housing offered is studio or one bedroom and is Discounted Market Rents (DMR) rather than London Living Rents (LLR) –
- The affordable housing is poorly designed with too many single aspect flats with poor outlook and which result in overlooking internally on the site and into neighbouring properties.
- The Archway Campus site does not meet Islington Local Plan for student housing, as it's not an allocated site for this purpose.
- The Local Plan prioritizes conventional and affordable housing over student accommodation due to land scarcity and existing high numbers of student beds in the borough. –
- Provision of student housing is a popular developer's tool as, not only does it provide considerable tax breaks and the avoids the payment of Council Tax by the operators, but it also skews the percentage figures of affordable housing in the developer's favour. –

- The inclusion of student housing in the scheme reduces the overall affordable housing provision to 22% by unit and 30% by habitable room, falling short of policy requirements. - Seven Capital has no nomination agreement with a higher education provider. –
- Recent data shows a 16% decrease in international student visa applications, contradicting the developer's claim of increasing demand for student accommodation. Tall Buildings –
- The Archway Campus site is not designated for tall buildings in the Local Plan. The tower breaches London Plan Tall Buildings policy which states tall buildings should only be developed in locations identified as suitable in Development Plans. –
- The proposed tower would create an oversized and damaging landmark, contrary to the Local Plan which requires tall buildings to create a positive landmark within the townscape.
- The proposed tower would interfere with strategic views to St Pauls Cathedral and strategic views from Kenwood.
- The applicant has provided many unrepresentative views of the tower carefully taken from points where the tower is partially or wholly obscured. Heritage Impact –
- The proposed scheme would cause significant harm to the setting of major heritage assets, including Grade I and II* listed gardens, parks, and buildings.
- Much of the heritage of the Infirmary Building will be destroyed.
- The scheme would be highly damaging to the setting of seven Conservation Areas. Four Conservation Areas are Islington, two in Camden and one in Haringey. –
- The scheme does not offer the required substantial public benefit to bypass the protection of Heritage Assets as it does not meet housing need.
- The scale of the damage to Heritage Assets has been consistently underestimated within the application, in particular the damage the 27 storey tower would cause. Impact on Neighbours
- There would be significant daylight reduction for Lidyard Road, Despard Road, and The Academy properties.
- Too many units within the development fail to meet BRE daylight standards.
- Block A's upper floor balconies and windows pose potential visual intrusion and privacy concerns for neighbouring properties as well as intrusive noise when the balconies are used and when windows are open.
- Proposed building distances from neighbouring properties are as little as 10.9 meters which will result in an unacceptable loss of privacy.
- The quality of the proposed open space is very poor, being largely paved, heavily overshadowed and very likely to be affected by wind blight from the tower.
- The proposed scheme does not provide anywhere near the required amount of play space as set out in the London Plan – with no play space for 12+ years as well as relying on access to play space outside the site.
- The proposed doorstep play area is totally inadequate - it’s a very thin strip with no room for play equipment and only 12% would receive 2 hours of direct sunlight. –
- The two play spaces for 5-11 year olds will be heavily shaded with only 38% receiving 2 hours of direct sunlight.
- The application fails to meet the mandatory 10% Biodiversity Net Gain (BNG) requirement, achieving only 8.54% BNG. - The proposed off-site offsetting is unacceptable given the size of the site.
- Green roofs are treated superficially and their viability is highly questionable due to potential overshadowing and wind effects from the tower. Support for the Plan B option –
- The applicant had produced a proposal for a low rise scheme which, following extensive consultation, was supported by the local community.
- This scheme still provides large numbers of housing - and with a 2 year build rather than a 5 year build required for Plan A housing, will be delivered more quickly. –

- While Plan B offers 45% affordable housing it should be possible to make adjustments to increase this.
- Plan B greatly reduces the impact on neighbours in terms of overlooking, and loss of daylight. - Reuse of the Staples Building, the Nurses Accommodation and Furnival House is a far more sustainable approach than demolition and re build and results in far less damage to onsite heritage assets.
- Removing the tower from the scheme results in no damage to off-site heritage assets including Grade I and Grade II* listed gardens, parks and buildings and no damage to the setting of seven Conservation Areas.
- Plan A, as submitted, has not been consulted prior to submission therefore community engagement on this scheme, has not taken place.

7.7 **Girdlestone Tenants and Residents Association:** Raised concerns regarding the tall building, the level of social housing proposed, the environmental impacts, disturbance associated with construction, and daylight and sunlight impacts.

7.8 **Friends of Highgate Cemetery Trust:** raised an objection due to the impact on the Grade 1 Registered Landscape of Highgate Cemetery. Raised concern that when Heritage Asset Plan overlaid with ZTV that the tower will be visible from large areas within Highgate Cemetery, although the Trust found no indicative visualisations in the Heritage Statement. Could not locate views 15 and 17 at Appendix 1.0.

Raised concerns that due to proposal's excessive height and proximity to the Registered Landscape the development would have an unwelcome sense of overlooking at odds with the designed landscape character of Highgate Cemetery. While the tower may be 'understood as part of the development within the broader, living city' [5.147], it is fundamentally different from other towers such as the Shard, for example, which form parts of the living city on the skyline. It is virtually on the Cemetery's doorstep and so would be highly intrusive.

Heritage Statement's proposed mitigation that visitors are 'often with their gaze oriented downwards towards the memorials and headstones within the space' [5.139] is self-serving and proposal will introduce feeling of surveillance. The Heritage Statement is wrong to claim that 'elements out with the boundaries of the cemetery do not affect the ability to appreciate the particular interest of the monuments and structures contained within.' [5.148]

As proposed, the development is in conflict with policies intended to protect the significance of these heritage assets.

Were the development to be reduced in height so as not to be visible from within the Registered Landscape the Trust have confirmed in their response they would have no such objection.

7.9 **Waterlow Park Trust Advisory Group:** Raised an objection to the development on the basis that the proposed tower would interfere with existing views from Waterlow Park across London. Objected to height of tower and the resulting impact on the setting of the park and nearby conservation areas.

7.10 **Better Archway Forum:** Welcomed proposals for new housing, however raised concerns that the promised level of affordable housing (51%) is only achieved by removing the proposed student units out of the calculations. Objected to the proposed development's non-compliance with development plan policies.

Noted that the proposed housing mix would not reflect local need, with an oversupply of studios and one-bedroom homes. The proposed affordable housing would be of a poor design, with a number of single aspect homes. The proposed student housing does not reflect local need and the applicant has no nomination agreement with a higher education provider.

The proposal would result in a tall building on a site with no tall building allocation. The tall building would be disproportionate to the local area and would cause wind and overshadowing issues. The tall building would impinge on local and strategic views and cause harm to neighbouring heritage assets including listed buildings and conservation areas.

The proposed development would result in neighbouring amenity impacts, including overlooking and loss of daylight.

The applicant has not provided evidence to show that they have explored re-use of the existing buildings.

7.11 **Camden Green Party:** Objected to the proposed development on the basis of the overbearing nature of proposed tower, the provision of student housing which does not reflect local demand and would put pressure on local services whilst generating no council tax income, insufficient family homes within the affordable housing provision, insufficient affordable housing offer, demolition of three designated heritage assets, and the removal of 21 trees. Noted that the applicant appears to have ignored community opinion and that there is no contract in place with a higher education provider for the student housing.

7.12 **Islington Homes for All:** Objects on basis of under-provision of affordable housing - cites that only 58 (14%) will be for social rent, yet it is social rent homes that are by far the most needed in Islington with its housing waiting list of over 15,000 households and many other households in overpriced and often overcrowded and/or insanitary privately-rented accommodation.

Objects to 38 units (9%) will be for shared ownership which is an unaffordable category of tenure for those in most housing need in the borough. Islington Homes for All believe that, taking into account the scale of the housing problem in the borough, all units classed as 'affordable housing' should be for social rent (i.e. council rent). The term "affordable" is misleading and its use should be either avoided or made clear that it can mean up to 80% of market rents.

Despite Islington Council's policy of ensuring 50% of all housing in new developments should be for social and intermediate tenures, on the Archway Campus Development, a mere 22% is being set aside for this. Despite Islington Council's policy of ensuring 50% of all housing in new developments should be for social and intermediate tenures, on the Archway Campus Development, a mere 22% is being set aside for this. 242 new units for luxury student accommodation is not included in the calculation for 'affordable' housing. The student accommodation (which will not be subject to council tax) is as much a part of the new development as the other units and should certainly be included in the calculation of the number of homes for social rent (and intermediate housing).

76.5% of all the units on the development will be for single people and just three units of the social housing will be family flats. Quite apart from the desperate need for social housing in the borough and the lack of it in plans for the development of this site, Islington Council is well aware of the urgent need for family flats, given the number of families in the borough in cramped, inadequate accommodation. We very strongly urge you to ensure a larger number of family flats for social rent on this development.

Islington Homes for All is greatly concerned by the lack of account being given to the most urgent housing needs of the population of this borough and urge Islington Planning Committee to undertake a thorough revision of the plans for the Archway Campus site submitted by Seven Capital. Urges Islington Council to demand full transparency and open consultation with the local community and the developers.

Any new development must both protect and improve the local surrounding area.

7.13 **Victorian Society**: Objected on the basis that the proposed development is unsuitable to the site and would result in substantial harm to the significance of the Conservation Area. The Conservation Area Appraisal is clear regarding the sensitivities of the site and how these should be responded to. Given that these proposals depart so much from what is judged an appropriate approach to working with the Conservation Area it is unclear how the current submission could be acceptable without radical amendments.

7.14 **Heath & Hamstead Society**: Do not object to principle of the site being redeveloped but raise concerns regarding inclusion of the tower which will have material adverse impacts on Hampstead Heath. Proposed tower would spoil the openness and visual quality of Hampstead Heath.

External Consultees

7.15 **Greater London Authority (GLA):** Strategic planning application stage 1 referral response appended to report (see Appendix 2).

7.16 **Civil Aviation Authority:** no response received.

7.17 **Historic England:** Object to the application on the grounds that the scheme would lead to multiple instances of harm to designated and non-designated heritage assets, registered landscapes and protected views which contribute to the special character of the historic and natural environment around Archway and Highgate.

7.18 **Historic England - Greater London Archaeological Advisory Service (GLAAS):** advised that the proposed development could cause harm to the archaeological interest of the building(s). Recommend that a Historic Building Recording of the current structures is carried out, with ongoing involvement for the recording of any historic fabric exposed during the proposed works. To achieve this GLAAS have recommended the inclusion of a pre-commencement condition should the application be approved requiring the submission of a written scheme of historic building investigation (WSI) to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

7.19 **Environment Agency:** Confirmed that the proposed development raises no environmental concerns.

7.20 **Health and Safety Executive:** Confirmed that the fire safety design is acceptable, to the extent that it affects land use planning considerations. However, HSE identified matters that should be addressed by the applicant ahead of later regulatory stages.

7.21 **London Fire Brigade:** Confirmed that the buildings are not currently due for an inspection under the risk-based re-inspection programme operated by the Commissioner.

7.22 **Metropolitan Police Design Out Crime Officer:** Reviewed the submitted details and raised a number of comments regarding the proposed design. Raised no objections, subject to a condition being included which would require the development to achieve Secure by Design accreditation.

7.23 **Metropolitan Police Counter Terrorism Officer:** Reviewed the submitted details and provided detailed confidential design guidance and recommendations on counter terrorism measures and procedures.

7.24 **Natural England:** No response.

7.25 **NHS England:** Raised no objections to the proposed development. In recognition of the population uplift associated with the proposed development and the resulting increase in demand for local NHS services, requested that a £621,744 contribution be secured towards local NHS services.

7.26 **Thames Water Utilities:** Advised that no concerns were raised in regard to the proposed development's impact on the combined waste water network, although noted that details of any piling should be secured by condition due to the site's close proximity to a strategic sewer.

Noted that there is an inability for the existing water network infrastructure to accommodate the needs of this development proposal. Requested that a condition be added to any decision notice ensuring that the development is not occupied until confirmation is provided that all necessary water network upgrades have been completed.

There is a water main near Tollhouse Way close to the position of the student buildings. Requested cross-sectional and plan drawings showing the face-to-face clearance to Thames Water's clean water main to confirm it would not be impacted by the proposed development.

7.27 **UK Power Networks:** Raised no objection to the proposals however provided design advice to ensure impacts on future residential amenity are minimised.

7.28 **Transport for London (TfL):** Overall the transport impacts of the scheme can be overcome through a s106 and section 278 (s278) mitigation package and conditions. However, further technical work is needed to clarify acceptable impacts on bus operations and highway safety. Additionally, more supporting analysis, design information, and technical assurance and safety auditing to TfL standards, as well as obligations to secure applicant-funded highway works, need to be provided and agreed prior to determination.

Raised concerns regarding proposals for a new loading bay for refuse collection, on street along Highgate Hill, immediately next to an existing bus stop and bus lane. Advised that further engagement with TfL is required on this matter and that the applicant must demonstrate prior to determination that the loading and access proposed could be safely delivered without increasing road danger or causing unacceptable impacts on bus operations.

Requested that a final Construction Logistics Plan (CLP) be secured by pre-commencement condition and discharged in consultation with TfL due to the site's proximity to the TLRN.

7.29 **Transport for London (TfL) – London Underground:** Raised no objections to the scheme, however noted a range of potential constraints that may impact on the redevelopment of a site very close to London Underground railway infrastructure. On this basis, they recommend the imposition of a condition, relating to the submission of details for approval and consideration by TfL prior to the demolition, sub-structure and super-structure phases of the development.

7.30 **Islington Society:** Raised an objection on the basis that the proposed development fails to comply with the development plan policies, raising concerns that the proposal includes a tall building on a site with no tall building allocation and includes student housing on a site with no allocation for student housing. Raised further concerns that no indication is provided as to how the proposed affordable housing would be funded and that the proposal includes extensive demolition which has sustainability, heritage, and social value impacts.

***(Officer comment:** the Site Allocation ARCH5 states that an element of student housing may be acceptable as part of the development mix provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant.)*

7.31 **Highgate Society:** Response received as part of the Archway Campus Joint Action Group detailed above.

7.32 **Highgate Conservation Area Committee:** Raised an objection to the proposed development on the basis of the harm it would have on the setting of neighbouring listed buildings, historic landscapes, and conservations areas, as well as on the wider setting of local views LV4 and LV5.

Neighbouring Boroughs

7.33 **London Borough of Camden:** no objections, recommended the inclusion of an informative relating to construction traffic.

7.34 **City of London:** no objections.

7.35 **London Borough of Haringey:** no comments received.

Internal Consultees

7.36 **Access and Inclusive Design:**

Public realm strategy

Supported the general urban design principles, including increased permeability and improved public realm. However, raised concern that the convenience of step-free routes does not appear to be well considered, that shared surfaces are proposed, and that it is not clear how conflicts between different transport modes would be avoided. Requested further design and landscaping details confirming updated step-free circulation across the site, the location of kerbs/dropped kerbs, how night time safety would be ensured, and details of engagement with residents with protected characteristics is requested.

Requested that in the event of approval, conditions be added requiring details of all materials, stairs, ramps, boundary treatment, planters, bollards, seating and other urban furniture, visitor cycle parking, wayfinding, lighting and planting to ensure compliance with local policy and guidance relating to Inclusive Design.

Play space

Noted that further design development of the proposed play spaces is required to ensure the safety of playground users is maintained, especially given proximity to roads. Requested that in the event of approval, conditions be added requiring inclusive play equipment to be provided.

Housing Mix

Raised significant concerns that proposed wheelchair accessible housing would not include any family sized units, contrary to requirements of Local Plan Policy H4. Further concern raised that no units within market-sale units are specified as being wheelchair accessible.

Transport

Requested further clarification regarding blue badge parking to confirm that, if required, a space could be provided within 50m of all wheelchair accessible units.

Raised concern that mobility scooter parking and appropriate accessible cycle parking spaces are not provided within each block.

Raised considerable concern with proposed layouts and circulation space across all cycle stores. Highlighted that a number of cycle stores do not feature step-free access and that the access arrangements for a number of the proposed cycle stores are convoluted and require users to navigate a number of doors and lobbies.

Residential Layouts

Highlighted a number of clarifications regarding the submitted drawings to demonstrate that the proposed compliance with local policy and building regulations relating to accessible design. Requested amendments to the proposed layouts where units are proposed which do not meet building regulations or London Housing Design Standards.

Requested confirmation of why no wheelchair accessible homes are provided within Block C, despite its more convenient location.

Student blocks

Raised significant concerns regarding location of accessible units above 5th floor due to emergency evacuation needs. Noted that proposed layouts fail to provide sufficient bed transfer space and that communal areas do not meet inclusive design requirements.

Requested that in the event of approval, conditions be added requiring details of adjustable kitchen worktops, accessible ovens, taps, room and bathroom layouts, window opening and switches installation height.

7.37 **Building Control:** Reviewed the submitted Fire Statement and raised concern that in many areas, the report is written as a proposal as opposed to a firm design. Noted that details of the building's construction, including methods, products, and materials used, are not provided. Furthermore, noted that details relating to the means of escape, features which reduce the risk to life, and fire service access are not fully dealt with.

Advised that the Fire Statement includes no details of smoke control/evacuation systems. Given the requirement for these to be included in any final design, it was noted these may impact on the visual amenity of the buildings.

7.38 **Urban Design Officer**: There are multiple elements of the proposal that are considered to be of a high quality of design including the overall urban form, the legibility of the form and layouts, contextual fit, fine landscaping, and the outstanding architecture of the three residential blocks to Highgate Hill.

The height of the tower is the cause of significant concern given its intrusion into multiple views with associated townscape impacts, and its incongruous height and scale relative to the retained buildings and form within the Holborn Infirmary Conservation Area.

There should be a meaningful reduction in the height of the tower, and it should be remodelled accordingly, including within the townscape views, so as to enable the Local Planning Authority to assess whether such a reduction is sufficient, alongside other matters that form the planning balance, to justify a tall building on an unallocated site within a conservation area.

Any height of the proposed building in excess of the policy limit of 30m would need to demonstrate compliance with all of the criteria in Policy DH3, part E.

7.39 **Ecology & Biodiversity:** Highlighted that the submitted ecological survey reports rely on data that is at least two years old and that there are a number of omissions, errors and inconsistencies within the submitted Biodiversity Net Gain details. Therefore, advised that insufficient information has been

provided to determine the likely ecological impacts of the proposals and recommended that the application is not determined until these issues have been resolved.

7.40 **Energy Services:** Energy Services officer recommend the application is not approved until further evidence has been submitted and approved covering:

- Details of Part L 2021 baseline
- Details of unregulated emissions / calculations, Part L 2013 baseline, and performance against Islington Council target
- Carbon Offset Contribution
- Clarifications regarding cooling strategy
- Approach to cooling hierarchy
- Compliance with CP1, anticipated costs of heat, standing charges etc
- Further details of approach to future-proofing the development for connection
- Safeguarding of network pipework route within the development
- Solar PV specifications

Management and Monitoring, and Arrangements for Addressing Performance sections of Green Performance Plan

Carbon Emissions: The SDCS shows a reduction of 81.2% in Regulated Emissions against a Part L 2021 baseline, which significantly exceeds the 35% reduction target. However, in terms of setting a baseline for the refurbishment elements, the SDCS referred to Part L1B, rather than the Notional Specification for Existing Buildings outlined in Appendix 3 of the GLA's Energy Assessment Guidance of June 2022. This should be checked, the baseline for the refurbishment elements and carbon reductions recalculated if needed (including for the overall development-wide figures).

Council CO2 reduction target: The SDCS does not quote any figures for unregulated CO_2 emissions. It is not currently possible to assess compliance against Islington's 27% target, as there is insufficient information available.

In order to do this, a comparison against a baseline derived from Part L1A/L2A 2013 (for all elements of the development, including refurbishment), and converted using SAP10 carbon factors, should also be provided. As mentioned above, this must also include figures for unregulated emissions.

Zero Carbon Policy: The SDCS quotes a figure of £30,544. However, this appears to be based on the old offset rate of £920, but applied to regulated emissions only. The offset contribution should be recalculated based on the rate of £2,850 per tonne, as above, and based on the final GLA methodology emissions (see also Section 1.1).

Sustainable Design Standards: Separate BREEAM Pre-assessments were carried out for the development. These include a New Construction assessment for new-build student accommodation, a Refurbishment and Fit-Out 2014 assessment for multi residential students accommodation, and a Domestic refurbishment assessment, covering the relevant elements of the Holborn Building.

Under the New Construction pre-assessment, the new Student Accommodation is predicted to achieve an 'Excellent' rating, with a score of 76.90%. For the refurbished buildings student accommodation, it is predicted that these will also achieve a rating of 'Excellent', with an overall score of 84.53%. Finally, for the refurbished Holborn building, this is also predicted to achieve an 'Excellent rating, with a score of 75.78%. These all represent fair to significant margins of comfort over the minimum 70% score required to achieve 'Excellent'

The development is expected to achieve a Home Quality mark 4-star rating, with an overall score of 275, exceeding the minimum 4-star requirement of 240.

Energy Demand Reduction (Be Lean) and minimising overheating: The U-values proposed for roof, floor, and windows are all better than the recommendations of Islington's Environmental Design SPD.

Air permeability is line with the 3.0 high limit recommended for a building with MVHR. Low energy lighting is proposed throughout the development.

The SDCS shows the residential element achieving a reduction of 13.2% in Regulated Emissions over a Part L 2021 baseline, and the non-residential element achieving a 19.6% reduction over the baseline. These both slightly exceed the required 10% and 15% reductions – subject to any changes made to the baseline figures, as per our previous comments in Section 1.1.

Dynamic thermal modelling & the need for active cooling**:** The SDCS provides a discussion of the cooling hierarchy. In terms of passive measures, this focuses initially on minimising solar and external heat gains via sizing of glazed areas and appropriately specified g-values. Internal heat gains are to be minimised via a focus on reducing heat outputs from lighting, equipment and internal pipework. The potential maximisation of thermal mass will also be considered.

In terms of ventilation, natural ventilation will be available throughout much of the development. However, Mechanical Ventilation with Heat Recovery is also proposed throughout the development – both on the grounds of maintaining comfortable temperatures in the summer months, as well as minimising heat losses in the winter.

It is stated in one part of the report that tempered air cooling is proposed for all dwellings throughout the development – while another statement suggests this will only be applied in dwellings which would otherwise be at risk of overheating. Specification of any cooling (or otherwise) for the non-residential elements is not clear. These points should both be clarified.

A TM59 overheating analysis has been undertaken for the residential elements in Blocks A, B & C, based on a sample of dwellings, generally considered to be at higher risk of overheating. The underlying assumptions for the analysis were generally considered to be reasonable.

The results show that the vast majority of rooms in Blocks A, B & C fail on the overheating criteria under the natural ventilation and mechanical ventilation scenarios, and only pass across the board where the air tempering cooling is applied.

A TM59 overheating analysis was also carried out for the Apex student housing block. This also shows the relevant areas failing under both the natural and mechanical ventilation scenarios, and requiring tempered air cooling in order to comply.

We would recommend that the approach to the lower levels of the cooling hierarchy is reviewed, to determine whether this can be enhanced and cooling demands either reduced or removed.

Low Energy Supply (Be Clean): Energy Services Comment: It is currently proposed that heating and hot water will be provided to the development via a communal site-wide network, served via air source heat pumps.

The use of secondary heat sources is not assessed in any detail. However, we are not aware of any significant and realistic opportunities for this in the immediate area – so would not request any further information on this for the time being.

The SDCS indicates that the carbon content of any heat will be below 280 gCO_2/kWh.

The SDCS does not appear to give any information on how the development heating system will comply with CP1, or anticipated costs of heat, standing charges etc (see above). These should be provided.

District Heating and Cooling Networks: The Energy Strategy assesses potential for connection to a DE network in the Archway area. There are longer-term aspirations for the creation of a heat network in the Archway area; however, any timelines around this are very uncertain and it is unlikely that any Archway network would be available in a 3-year period. For these reasons, the applicant does not propose an immediate connection to a network, and this is accepted.

Site-wide communal system/network and design for district network connection: The SDCS indicates that the development will be future-proofed for connection to a DEN. This will be accomplished via a site-wide communal heating system, with a connection point and a protected route to the edge of the development. This is welcomed. However, further detail should be provided showing any reserved riser space/protected pipework routes within the development and to the edge of the site, a schematic of the heating and cooling system which shows connection points, and information regarding flow and return temperatures etc.

In addition, there is a route across the northwestern part of the development site, which has previously been identified as a corridor for pipework, as part of the route of any future Archway heat network. It had previously been agreed that this route would be safeguarded via the installation of connecting pipework. (See extract from 2016 energy statement, provided separately, which addresses this and the route.) The applicant should confirm their approach, as to how this pipework route will be safeguarded.

Shared Energy Network(s): The energy statement does not address shared heat networks as such. However, the priority in this case would be to ensure the future-proofing of the development, in order to enable any potential connection to a future Archway Heat Network. Therefore, we would not request any other information relating to shared heat networks at this time.

Alternative low carbon on-site plant (e.g. heat pumps): The Energy and Sustainability Strategy proposes air source heat pumps (see comments above).

Renewable Energy Supply (Be Green): Air source heat pumps are proposed, and these are discussed elsewhere in these comments. In addition, solar PV arrays totalling 54.4kWp are proposed. The kWh/yr outputs and overall m2 panel area should also be provided.

Be Seen: Information relating to the 'Be Seen' requirement and operational energy use has been provided within the SDCS. 'Be Seen' requirements will also be addressed via any Section 106 Agreement.

Draft Green Performance Plan: A draft Green Performance Plan has been provided, as an appendix to the SDCS. The information provided within this is acceptable. However, we would require further details regarding arrangements for Management and Monitoring, and Arrangements for Addressing Performance. Although the GPP is only at draft stage, information on outline arrangements should be provided – and this can then be updated at later stages of the GPP as needed. (Further updates to the GPP will also be required at Section 106 stage.)

7.41 **Heritage Officer:** Objection. The proposed development would cause harm to the significance of the designated heritage assets and in the terms of the NPPF, this would be less than substantial harm. The harm relates to the demolition of non-designated heritage assets, including the interiors of the retained buildings, the loss of openness of the west side of the site, the scale, height and footprint of the new buildings, including the tall building, which would dominate the conservation area, its buildings and the settings of heritage assets and the impact of the tall building on designated views.

The detailed comments of the Heritage Officer are incorporated into the assessment of the proposal set out in relevant sections below.

7.42 **Highways:** The loading bay proposal on Highgate Hill had been highlighted as an issue and Islington feel that this is not really an option due to the current bus stop location and possible impacts on the highway network that a loading bay in this location or indeed on Highgate Hill would have. The modifications to the entrance would need to be investigated further due to the proximity to the traffic lights on Highgate Hill to the south of the current entrance. A s106 agreement and highways reinstatement contribution would be required leading to a s278 agreement to mitigate impacts to the Islington maintained public highway.

7.43 **Inclusive Economy Officer (Archway Town Centre):** Raised concerns that the space offered by the applicant to the Council for use as a community space would be difficult to manage due to proposed glazing to all walls. Further concerns were raised that the space was not very large and has an awkward layout, which results in concerns the space would be difficult to use.

Notwithstanding the above, noted that there is local demand for creative workspaces and questioned whether the applicant could provide this within the development.

7.44 **Planning Policy:** have raised several concerns including social and community infrastructure uses, commercial uses and the requirement for a sequential test, provision of affordable housing, tall buildings and student accommodation. Policy positions were also given on quality of residential accommodation including minimum space standards for residential units, floor to ceiling heights, dual aspect and private outdoor space, and amenity impacts on adjacent properties, open space provision and green infrastructure, play space, transport and public realm.

Land use

Social and community infrastructure

The site is currently vacant but was formerly used by University College London (UCL) and the Whittington Health NHS Trust for health and educational purposes. The site also included some nurses' accommodation which was ancillary to its clinical uses. It has historical significance as the Holborn Union Building was originally conceived as a workhouse and associated infirmary in the 19th century and continued in hospital use prior to its incorporation into the Whittington Hospital complex of buildings in 1944.

The most recent authorised use of the site was by Middlesex University and University College London as a medical teaching campus. That use ended in 2013 following the relocation of the medical school. In 2015 there was an unauthorised change of use of the site to a 'live in guardian' residential premises. However, following a planning enforcement investigation the unauthorised use ceased without enforcement action being taken and the buildings have remained vacant since. Given the live in guardian use, there is no right to revert to the former lawful use without permission.

Policy SC1 Part E sets out that the council will not permit any loss of social and community infrastructure uses unless (i) a replacement facility is provided on-site; (ii) the existing use is not required on-site, demonstrated through the provision of marketing and vacancy evidence; or (iii) the proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's estates programme. Notwithstanding the change in use facilitated by the unauthorised use of the site, it is considered that in this case Part E (iii) would apply as the site was owned by recognised public sector bodies and made vacant as part of an estates rationalisation programme.

Following a review in 2012, UCL considered Archway Campus 'unsuitable to continue to accommodate higher education provisions in its current state … and a prohibitive level of investment would be required to update the campus to an acceptable standard'. The decision was made to vacate and dispose of the site. The Medical School and UCL Division of Medicine and Engineering who were occupying the site at the time were relocated to the Whittington Hospital, the Royal Free Hospital in Hampstead, and to parts of UCL's campus in Bloomsbury.

Archway Campus is allocated (site reference ARCH5) for residential-led development with some commercial and community and social infrastructure uses. The re-provision of some social and community infrastructure would be appropriate given the site's long association with public health and education uses. The applicant is proposing to deliver 'a small unit [88sqm] to be provided as a commercial use, potentially a community café' (planning statement para. 4.3). This unit would be located at the ground floor of affordable housing Block C, and the proposed use classes are E (commercial, business and service) and F.2 (local community). The plans also indicate that there may be a small commercial unit at the base of the proposed student accommodation tower, although this requires clarification as it is labelled commercial/amenity space and is not referred to in the accommodation summary provided at Table 7 of the Planning Statement.

Given the lack of certainty about the proposed use of the Block C unit there is a possibility that no community and social infrastructure use will be provided at the site, which would not be consistent with the site allocation in land use terms. The approach to community provision should therefore be clarified. Furthermore, it is considered that the provision of one or potentially two small units for commercial/amenity and commercial/community use is not in the spirit of the site allocation which seeks some commercial, community and social infrastructure use at the site.

The Social Value Plan appended to the applicant's Economic Benefits and Social Value Assessment suggests that the Block C commercial unit will be leased to the council for a period of 3 years for community use, and the applicant will exempt the unit from service charges during this period and provide £25,000 towards fit-out costs. As this is the only space at the development offered for a potential social and community infrastructure use despite the requirements of the site allocation, Planning Policy would question if the proposed three-year lease is sufficient. The potential to secure this space for longer to help local community groups should be explored with the applicant.

Some potential uses for the unit are explored in the Social Value Plan. However, as discussed above, the approach to social value and the community space should be clarified. Any provision for community use agreed with the applicant should be secured via a planning obligation. It will also be

important that this addresses the criteria for new social and community infrastructure as outlined in Policy SC1, part H.

Commercial Uses

Local Plan Policy PLAN1, part B requires development to 'sustain and reinforce' a variety and mix of uses, in line with relevant land use priorities as set out within the Local Plan. Moreover, and of particular relevance owing to the site's proximity to the Archway town centre, Policy SP7 expects development within the Archway Spatial Strategy Area to support the commercial function of the area, particularly the retail function of the town centre. Consistent with this, the site allocation (ARCH5) sets out an expectation for "some commercial and community and infrastructure uses", with active frontages in particular sought on the southern part of the site and "where it can make a contribution to the public realm". The site allocation also suggests that development of the site should provide linkages to the Archway Town centre in line with PLAN1, part B which requires development to improve permeability and take all opportunities to repair fragmented urban form. Proposals are expected to improve safety and promote positive social contact through the creation and enhancement of effective places to dwell.

As discussed in greater detail below, the proposed scheme would provide a significant improvement with regards to better connecting the site to the Archway town centre, through the opening up the south of the site and creating new areas of public realm. The opportunity to provide active ground floor uses that draw people across Navigator Square from the town centre into the space would help to further enhance this, whilst also helping to activate the proposed new areas of public realm.

Despite this, currently, only a very limited amount of active ground floor uses are proposed. One small (88sqm) commercial unit is proposed within the ground floor of Block C, which, notwithstanding the uncertainty around the intended use of this building, is not considered to be a particularly prominent location in which to contribute towards helping to activate the proposed public realm.

In addition to this, there appears to be a small (28sqm) amount of commercial floorspace proposed within the ground floor of the student tower, within the floorplans provided this space is labelled as 'commercial/amenity space'. Within the Design and Access statement (P.236) it is suggested that this space may host a small café or coffee shop. Despite this, the intended use of this space remains unclear, this potential additional commercial floorspace is not referenced within the accommodation summary provided within Table 7 in the Planning Statement, Further clarification regarding the intended use of this space is requested, for instance, it is not clear what use class this space is intended to be or whether this space will be open to the public or whether it will be exclusively accessible to occupiers of the student accommodation?

The provision of some commercial uses within the ground floor of both the student tower and accompanying student amenity building is considered to represent a suitable location for the provision of additional commercial floorspace, helping to promote positive social contact and activating the public realm in line with Policy T4(A)(v). Moreover, given that this location is just outside of the town centre boundary, this would help to further connect the site to the Archway Town Centre, in line with the requirements of the allocation, SP7 and PLAN1 as discussed above.

Notwithstanding the limited amount of retail/commercial floorspace proposed by this application, owing to the sites locations in an edge-of-centre location, the requirements of Policy R3, Part F will need to be satisfied, these requirements are reproduced below:

Any proposal for main Town Centre uses in an edge-of-centre location outside LSAs or in an out-of-centre location must:

(i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and

(ii) provide an impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.

Supporting paragraph 4.97 provides further guidance, it confirms that the requirement to meet the sequential test does not apply to F1/F2 uses, instead applications for such uses will be assessed against Policy SC1.

Given the uncertainty surrounding the proposed quantum of commercial/retail floorspace to be provided, it is not possible at this stage to provide detailed comments relating to the scope of the necessary sequential test and impact assessment.

Housing

Affordable Housing

As a site formerly in public ownership, Policy H3 part D requires the site to provide 50% on-site affordable housing (by net additional unit) without public subsidy and demonstrate how all public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised. By unit number, the applicant's affordable housing offer comprises 51% of the proposed dwellings. However, it is not clear if this includes grant – this is not specified in either the planning statement or the affordable housing statement. Conversely the appendices of the viability assessment appear to show circa £7million of grant funding. The use of grant and the level of affordable housing achieved with and without its use should be clarified by the applicant. If 50% affordable housing without grant cannot be achieved, this raises a policy compliance issue with policy H3 part D.

If 50% affordable housing without grant can be achieved it will be important to demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% (by net additional unit) have been utilised, and additionality demonstrated in order to comply with policy H3, part D. If this cannot be demonstrated to the Council's satisfaction, then in line with Policy H3 Part E the proposal should be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late-stage review mechanism.

Tenure split

Policy H3 Part J sets out that the tenure split of on-site affordable housing should be 70% social rented housing and 30% intermediate housing, with the majority of intermediate units provided at London Living Rent. The applicant's affordable housing offer breaks down into 64% social rented housing and 36% keyworker accommodation provided at London Living Rent levels in perpetuity. This is not policy compliant in relation to the provision of social rented housing, and the reasons for this are not explained or justified in the applicant's Affordable Housing Statement. Further information on the reasons for the policy non-compliant tenure split should be sought from the applicant. Any grant funding secured by the applicant should be used to increase the delivery of on-site affordable housing in excess of the 51% offered and to increase the percentage of social rented housing to deliver a policy compliant tenure split.

Keyworker accommodation

In their Affordable Housing Statement the applicant suggests that they are in discussions with Whittington Health NHS Trust about how the proposed keyworker housing should be administered. This includes the Trust taking ownership of the intermediate homes and letting them directly, or a Registered Provider managing the units in line with a nominations agreement with the Trust and wider NHS.

Islington's local plan does not give priority to key workers in the allocation of housing. The need for affordable housing in the borough is severe, and many residents on low and median incomes could benefit from the availability of units let at London Living Rents. Discussions should take place with the council's Housing Needs team to ascertain the benefits of the proposed arrangement with the Whittington Health NHS Trust. If it is considered appropriate to proceed with the provision of key worker accommodation, priority should be given to hospital staff and NHS workers who are also Islington residents when the units are let, with the specifics of the nomination process discussed with the council. It is also considered that keeping the units as starter units to be let at LLR in perpetuity would help to maximise the benefits of this aspect of the affordable housing offer for the borough and its residents as well as staff at the Whittington.

Quantum of housing and land use

The site allocation states clearly that:

'Given the very limited supply of development land in Islington policies strongly prioritise the most urgent need, which is conventional housing. An element of student housing may be acceptable as part of the development mix, provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant'.

The applicant's planning statement details that 31% of the proposed floorspace at the development is dedicated to purpose built student accommodation (PBSA). The scheme is residential-led with 69% of the proposed floorspace being for conventional residential use, but the proposals clearly contain more than an element of student accommodation and very little in the way of commercial and social and community uses, which are also required by the site allocation.

It is set out in the applicant's Planning Statement that 'the presence of PBSA is an enabling use to cross subsidise the delivery of accommodation in the greatest need, which is ostensibly 'conventional' affordable housing'. However, there is a serious question as to whether the proposals maximise the amount of conventional residential housing on site, and the extent to which the proposed quantum/proportion of student accommodation can be justified. Is the PBSA purely an enabling use, or does the scale of PBSA proposed weigh against the delivery of conventional housing? Additional justification is required from the applicant.

As well as the proposed student accommodation tower, it is proposed to use the existing Clerkenwell Building for student accommodation. Would it be possible for the Clerkenwell Building to be used for conventional housing rather than student accommodation? Could it accommodate further affordable housing? Switching the use of the Clerkenwell building could be a potential solution to help provide both more housing and affordable housing. It is recognised that assessing the extent to which the PBSA is an enabling use for the affordable housing is related to the financial viability of the proposals.

Unit size mix

A total of 91 affordable homes are proposed across three buildings, known as Blocks A to C.

Block A is intended to provide 33 keyworker rental units, comprising 28 x 1 bed units and 5 x studios. The block will also accommodate three social rent units – 1 x 3-bed unit and 2 x 4-bed units.

Blocks B and C will provide 41 and 14 social rented units respectively. Block B is proposed to comprise 23 x 1-bed units, 15 x 2-bed units and 3 x 3-bed units. Block C would consist of 1 x 1-bed units, 8 x 2-bed units and 5 x 3-bed units.

In total, out of the 91 units of affordable housing proposed, 52 units would be 1-bed units. This concentration of one-bedroom units within the affordable housing component of the development conflicts with Policy H2 Part E. No demand for studio units is identified in Table 3.2 of the SDMP, which outlines the housing size mix priorities for each tenure. In addition, low or medium priority is given to 1-bed social rented units and medium priority is given to 1-bed intermediate rent units at London Living Rent levels. In contrast, high priority is given to 2-bed social rented units, with the proposals including 23 out of 91 units as 2-beds. However, the supporting text to SDMP Policy H2 does accept that 'affordable housing in particular may require a different mix to address short term changes in need/demand'. If the applicant has been involved in any discussions with the Council's Housing Needs team that have informed the unit mix and the high proportion of 1-bed social rented units in the proposals this information should be presented to the case officer for consideration.

The Affordable Housing Statement indicates that the applicant has engaged with the Whittington Health NHS Trust in relation to the provision of key worker accommodation, and the Trust has sought the provision of 1-bedroom and studio homes at London Living Rent, in order that they are affordable to households on the lowest incomes. Further information should be provided in relation to discussions with the Whittington Health NHS Trust and evidence provided to justify their specific need for the concentration of 1-bedroom units proposed. Evidence prepared by the NHS on the need for affordable

homes for NHS staff in north and central London suggests that the most significant need is for 2-bedroom properties. This is primarily driven by the requirements of single parent families with children, two sharer households and couples with one child. It is recognised however that there is significant need across the spectrum of household types and a mix of new properties is required in order for the NHS to attract and retain staff2.

The unit mix of the 87 market housing units is more varied – with no studios, 23 x 1-bed units, 28 x 2-bed units, 33 x 3-bed units and 3 x 4-bed units. Table 3.2 of the SDMP indicates there is low priority for 1-bed market units, high priority for 2-bed market units, medium priority for 3-bed market units and low priority for 4-bed market units. As such, it is considered that there is a more modest over-concentration of 1-bedroom units proposed, as well as an over-provision of 3-bed units.

In conclusion, 75 out of the 178 residential units proposed across the scheme, equivalent to 42%, would be 1-bed units. This over-concentration of 1-bedroom units conflicts with Policy H2 Part E, and evidence should be provided by the applicant to justify the proposed unit mix and the high proportion of 1-bed units in the affordable housing component of the development specifically. It is understood that there may be constraints associated with the heritage building that have influenced the design and unit mix of the market housing units, but this does not extend to the new build affordable housing blocks.

Tall buildings

The proposed tower is 27 storeys or 82m tall. The applicant suggests in their Planning Statement that while the site does not benefit 'from in-principle support for a tall building, this does not automatically trigger a binary conflict with policy'. Planning Policy disagrees and has an in-principle objection to the provision of a tall building in this location. Policy DH3 states clearly that buildings of more than 30 metres are considered to be tall buildings and are only acceptable in-principle on sites where the site allocation makes specific reference to suitability for heights of 30 metres or more and/or within specific sites identified in a Spatial Strategy area.

The Archway Campus site is the subject of a site allocation which does not make specific reference to its suitability for heights of 30 metres or more. Three sites within the Archway Spatial Strategy area are considered to have potential for the development of new tall buildings, as set out in Spatial Strategy area Policy SP7 Part L and listed in paragraph 2.90 of the supporting text.

London Plan Policy D9 requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development as part of a plan-led approach to managing future growth. The London Plan expects an exercise to be undertaken which assesses the potential visual and cumulative impacts and considers locations where tall buildings could have a role in contributing to the emerging character and vision for a place.

The Islington Tall Buildings Study identifies specific locations across the borough where tall buildings may be appropriate. Archway was identified as one of the strategic areas for search through the Study and then a local search was undertaken to identify opportunities for tall buildings within this area. The local search was undertaken based on urban design and character analysis.

The sieving analysis for Archway identified 12 hypothetical sites for tall buildings. Hypothetical sites were potential sites of a reasonable scale that could come forward for comprehensive development and where, hypothetically, a tall building could be proposed. Two points on the Archway Campus site were identified as hypothetical tall building sites - Archway Campus (West) (site A-03a) and Archway Campus (South) (site A-03b).

The analysis in the Tall Building study for both hypothetical Archway Campus locations excluded the site on local character grounds. It was considered that a tall building in either location would detract from the character of the Holborn Union Infirmary Conservation Area. In addition, it was considered that a tall building on the Archway Campus (South) site would intrude on the Local View to St. Paul's from Archway Bridge (LV5).

It is noted that the applicant has appended a letter from the Design Review Panel (DRP) setting out that they 'support the tower in principle'. However, the letter also notes that the information presented to DRP was incomplete so they could not assess the impact of the building on LV5a.

Planning Policy have not considered the proposals against the criteria set out in Policy D3 Part E, which guide an assessment of the visual, functional and environmental impacts of tall buildings, given the in-principle policy objection to a tall building in this location. Notwithstanding this, if the case officer is minded to approve the proposal then the detailed criteria in Policy D3 Part E will need to be considered and fully addressed.

The departure from the development plan represented by the proposed tall building needs to be considered alongside all elements of this scheme. The case officer needs to be satisfied that the benefits provided by the proposals clearly outweigh the policy harm caused by this conflict with the development plan.

Student accommodation

The proposal for Purpose Built Student Accommodation comprises three elements:

• Student accommodation tower – new 27 storey/24 floor building, providing 210 studios (10 studios/floor); basement proposed to accommodate a gym, cinema, bin store and plant room; ground floor proposed for a lobby and café; first floor proposed for study and lounge; top floor proposed for communal dining area; roof proposed to accommodate remaining plant.

• Student amenity building – new three storey building consisting of basement cycle parking; ground floor lobby; first floor amenity space.

• Conversion of the existing Clerkenwell building into student accommodation, providing 32 studios over 4 floors; ground floor proposed to provide student amenity space, bin store and lobby.

Policy H6 Part A sets out the types of locations where student accommodation will be permitted, which include sites allocated for this use. As previously mentioned under the land use section of the comments, the Site Allocation, ARCH5 is for residential-led development, and it indicates that conventional housing is strongly prioritised. An element of student housing may be acceptable as part of the development mix, provided that it can ensure the development can achieve the fully policy compliant quantum and tenure of affordable housing

Quality of accommodation - Policy H6 Part B (i) requires student accommodation to meet the relevant requirements for residential quality in Policy H4, including to provide good-sized rooms and communal space.

• Space standards - While there are no minimum space standards set in policy for student accommodation, Policy H6 B (i) requires the provision of ‘good-sized’ rooms and communal space. Supporting paragraph 3.96 indicates that bedrooms and separate communal/amenity areas should consider HMO guidance as a starting point to considering good sized rooms.

The standards used by Islington to assess the suitability of HMOs3 indicate that for one occupant, the minimum size of a room containing kitchen facilities is 12sqm. This excludes bathroom facilities.

The new build PBSA studio sizes are 20sqm, and 21 sqm for the wheelchair adaptable/accessible units. In the converted Clerkenwell building the studio sizes would range between 18.1sqm - 29.8sqm. These exceed the minimum HMO standards.

• Recycling and waste - Policy H4 Part D (ii) requires that appropriate consideration is given to how recycling and waste arising from the occupation of the development will be stored, collected and managed.

The Student Accommodation tower and amenity building are served by a bin store located in the basement of the tower. Refuse for the commercial unit at the base of the Student Accommodation building will be combined with this. The Clerkenwell building has a bin store on the ground floor.

The collection point would be located at the north of the Clerkenwell building, adjacent to a lay-by designated for service vehicle use, and this will be within a 10m drag distance.

• Room function comfortably and efficiently - H4 Part D (iii) requires the provision of rooms which are designed to function comfortably and efficiently for their intended purpose

This requirement is also reinforced in the Purpose Built Student Accommodation London Plan Guidance (PBSA LPG), which stresses the importance of ensuring a quality of accommodation broadly comparable to the wider neighbourhood. The LPG indicates that bedroom sizes should recognise that student bedspaces are also spaces for study, storage and private socialising.

The new build studios include en-suite toilet and shower room, kitchenette, bed, wardrobe, and a table or desk. The wheelchair accessible studios in the new building appear to have a smaller wardrobe and a single/queen size bed. In the converted building the studios make the same provision, however the layouts are more constrained e.g. beds only accessed from one side. Some of the rooms which have a table instead of a desk would provide private socialising space, however for other rooms this would be extremely limited.

• Communal space - In addition to the requirement in H6 B(i) for the provision of communal space, the LPG also mentions that 'the building as a whole should provide for different student needs such as study, relaxation, socialising, retreat, privacy, exercise, laundry support and worship'.

In terms of communal amenity space, there is space provided internally for lounge, communal dining, cinema and fitness, as well as other amenity spaces which don't appear to have a defined function. There doesn't appear to be any provision of laundry facilities or communal kitchens, which would likely have negative impacts on amenity for students, as well as creating pressure on local businesses in the area. In addition there is an external amenity space provided on the first floor of the student accommodation tower in the form of a balcony measuring approx. 57sqm. The DAS also includes the external Clerkenwell square and the informal seating area between the Clerkenwell building and the northwest elevation of the Accommodation building as outdoor amenity space, however these are public spaces and should not be counted towards the provision of communal space for students.

The table below shows the different types of internal communal amenity floorspace proposed across the student accommodation tower, Clerkenwell building and student amenity building. The figures have been drawn from the Planning Statement and Viability Statement. The Planning Statement indicates that a total of 733sqm of amenity space would be provided, however this seems to exclude the amenity space in the basement of the student tower which would be an additional 34sqm. The Viability Assessment does not appear to include the amenity space proposed on the ground floor of the Clerkenwell building. The Design and Access Statement provides a different range of floorspace figures for amenity space, measured as 'Net Sales Area' which are lower than the GIA measurements.

The lack of consistency and clarity about the quantum of student amenity space is concerning. The Design and Access Statement states that the internal student amenity space in the two new buildings and Clerkenwell wing amount to approx. 2sqm/student, with external amenity space adding a further 1-1.5sqm/student. The Viability Assessment states that 'the current provision of 2.85sqm per bed is in line with a market standard of 2-4sqm per bed.' However, the figures in the table below amount to approx. 3sqm/student of internal communal amenity space.

Location	Floorspace (GIA)	Proposed Uses
Student accommodation tower basement	34sqm	Cinema and Fitness
Student accommodation tower 1st floor	187sqm	Communal dining or lounge
Student accommodation tower 23rd floor	307sqm	Communal dining or lounge
Student amenity building 1st floor	104sqm	Flexible student amenity space ('town hall')

Clerkenwell building ground floor	135sqm	Student amenity space
Total	**767sqm**	

There is a lack of clarity on the specific functions of the student amenity spaces, particularly on the ground floor of the Clerkenwell building, and the first floor of the student amenity building. The need for these spaces has not been justified. There is potential for some of this space to be earmarked for other uses, particularly given the requirement in the site allocation to provide active frontages and commercial and social and community infrastructure uses. The inclusion of uses such as cinema and fitness, and the lack of basic functions such as laundry facilities is questioned. Overall it is considered that the quantum of communal amenity space is excessive.

No justification has been provided for the amenity space on the top floor of the student accommodation tower being double height. The provision of a single height top floor should be considered, particularly given the departure from the development plan in terms of building height.

Impacts on neighbouring amenity - H4 Part H requires consideration of impacts on adjacent properties in terms of issues such as overlooking and overshadowing, impact on existing delivery and service provision, noise and vibration. In terms of overlooking, the vertical piers on the façade are designed to limit overlooking on the northeast elevation. In the Clerkenwell student accommodation building, the majority of studio windows face towards the public square. In terms of overshadowing, the Daylight and Sunlight Report does not indicate unacceptable adverse impacts.

High level of amenity – Policy H4 Part K also requires proposals to prevent or mitigate noise impacts. The DAS explains that adverse noise and vibration impacts arising from the site's proximity to a busy road would be mitigated by the fact that windows are not openable.

Policy H6 Part B(i) requires the provision of good levels of daylight and sunlight and natural ventilation.

The PBSA LPG also reinforces this principle: para 2.6.2 'As well as sensible layouts of different bedroom-based amenities there are some wider considerations. These include ensuring good standards of sound-proofing, daylight and natural ventilation in private and communal spaces, where possible achieving dual-aspect shared living rooms or at least a reasonable exterior outlook.

The Daylight and Sunlight report indicates that 100% of studios in the student accommodation tower comply with BRE daylight recommendations, however in the Clerkenwell building, only 31% of studios are compliant.

In terms of natural ventilation, the windows in the Student Accommodation tower do not open. The DAS explains this is due to limiting noise impacts and ensuring safety. Mechanical ventilation is provided in the studios. It is also proposed that a ventilation panel behind a weathered louvre is included at low-level as part of the fixed window system, which can be opened by students in the warmer months.

Accessible accommodation - Policy H6 Part B (ii) requires 5% bedspaces to be easily adaptable for wheelchair users. The Inclusive Design SPD Section 6 requires 10% of bedrooms to be wheelchair accessible. While the proposed scheme meets the quantum of provision required, there are concerns about the location of the units within the building– the Inclusive design officer will provide detailed comments on this matter.

Site management and maintenance plan - H6 Part B (iii) requires applicants to ensure the provision of an appropriate site management and maintenance plan. Para 3.98 sets out what this should include. It mentions that this should be submitted at earliest stage, ideally at pre-application. No site management and maintenance plan has been submitted with the application to satisfy this policy requirement. This needs to be addressed.

Nomination rights - H6 Part B (iv) requires nomination rights, prioritising local higher education institutions. This is also a requirement of London Plan policy H15 A. The applicant's Student

Accommodation Demand Assessment states that 'At this junction we have not explored potential interest for the site from universities in London but believe it would be of interest to a number of parties.' However the application provides some evidence of demand for student accommodation as follows: 'There are over 30 schemes within the borough, totalling c.10,000 student beds. Given that there are c.164,000 full-time students within a 30-minute catchment and c.30,000 full-time students within the borough, it is clear that the existing supply is insufficient to fulfil the needs of students. Based on the statistics listed above, there are at least c.20,000 full time student living at home or within the private rented sector (e.g HMO's).' The information provided so far is not considered sufficient to satisfy the policy requirements. The use of the accommodation can only be for higher education students, this should be confirmed through a binding nomination agreement provided to the council between the student accommodation provider and relevant university or universities. Higher Education Institutions that are local to the development are prioritised. The s106 agreement should confirm the nomination agreement and its operation over the lifetime of the development.

Temporary uses - H6 Part B (v) – requires that any other temporary uses must be secured by legal agreement. This is not mentioned in the application. However the DAS indicates how the layout of the upper floors which are proposed for student accommodation could be adapted for different uses e.g. office, PBSA with clustered beds, general needs housing. This is unclear and not considered to be suitable to meet the policy requirements. Any temporary non-student use of the PBSA should be ancillary and can include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses. The operation of non-student use must not disrupt the accommodation of the longer-term resident students and the management of the use will be set out in the s106 agreement.

Affordable student accommodation - H6 Part B (vi) sets out the required to provide at least 35% affordable student accommodation in line with London Plan Policy H15. There is no affordable student accommodation proposed. London Plan H15 Part A 4b applies, which requires a viability assessment in line with London plan Policy H5 Threshold approach to applications, Part E.

Mixed and inclusive neighbourhood – Policy H6 Part B (vii) requires applicants to ensure the development contributes to a mixed and inclusive neighbourhood. Further guidance is provided in the PBSA LPG on how to assess this criterion is met:

• locating PBSA in well-connected, well-served areas including town centres. The proposal is located within Archway Town Centre, in a high PTAL area.

• concentration and dominance of uses – There is no provision of other PBSA within the immediate proximity of the site, however there is extensive provision of student accommodation in the centre and south of the borough. The Site Allocation, as referred to previously, requires residential-led development where an element of student accommodation is acceptable if it does not outweigh or undermine the provision of genuinely affordable housing.

• mixed use – The PBSA LPG suggests that this can be achieved through 'incorporating publicly accessible uses (such as shops and services, open space, and community facilities such as gyms and meeting space) within the development', providing 'other employment space, such as offices, shared workspace or workshops (including affordable workspace)', or incorporating 'satellite university teaching, research or library provision'. Paragraph 2.4.5 of the PBSA LPG indicates that 'a borough's Local Plan policies and wider spatial strategy, and site-specific circumstances, will remain relevant considerations – including whether a site falls within town centre or CAZ boundaries.' The proposed PBSA buildings only incorporate a small element of commercial use (28sqm) – a café located on the ground floor of the Student Accommodation tower. However, there is a lack of clarity on the use of this space and whether it would be publicly accessible, as highlighted previously in the 'Commercial uses' section. The cluster of student buildings would have very limited interaction with the rest of the site and the wider neighbourhood and would not provide active and engaging ground floor uses for the wider public. The provision of private amenities such as a cinema and gym only for the use of students, would not contribute to a mixed and inclusive neighbourhood, while the lack of essential facilities such as laundry provision for students could potentially have an impact on this type of service locally.

Public Realm

The site allocation ARCH5 is clear in setting out an expectation for any development proposal to deliver improvements to the public realm to improve connectivity to the Archway Town Centre, it also highlights the need to consider the significant level changes across the site.

Policy T4 relates to public realm, Part A of this policy sets out several considerations, confirming that "All development proposals must engage positively with the public realm and must ensure that the public realm:

is permeable, legible and designed with regard to pedestrian and cycle desire lines;

(ii) provides for the safety and convenience of all users, including those with mobility, sensory and or cognitive impairments;

(iii) increases natural surveillance, including through the provision of adequate lighting;

(iv) contributes to the quality and quantity of green infrastructure; and

(v) promotes positive behaviours and social activities and encourages a diverse range of users to make use of space and facilities available.

With regards to these requirements, as highlighted above, it is proposed to create two distinct areas of public realm, the proposed public realm in the northern portion of the site is characterised by incorporating a variety of green features as shown with the Landscape Statement (P.14). Significant features include the creation of the new Heritage Garden and proposed Woodland Walk. In contrast to this, the southern part of the site is characterised by the creation of new public squares which are dominated by hard landscaping. Whilst several new trees are proposed within these areas, additional detailed comments have been provided by the Sustainability Officer regarding this.

With regards to T4(i) the initial view is that this proposal will contribute towards improving the permeability of the site, clear routes are provided throughout the site which respond to the proposed site layout and the positioning of the buildings. The routes into the site appear to be logical, providing clear views into the site, aiding legibility. In particular the opening up of the southern part of the site will provide better connectivity between the site and the Archway Town centre. Further detailed comments should be provided by Conservation and Design Colleagues with regards to how the proposal addresses the requirements as set out within T4(i).

The positioning of the buildings and their relationship with the proposed areas of open space, public realm and routes through the site ensures that they all benefit from passive surveillance in line with part A(iii). The suitability of the proposed lighting will also need to be assessed by relevant specialisms such as Conservation and Design, Inclusive Design and Sustainability An overview of the proposed lighting arrangements is provided within the Landscape Statement (P.64-66).

Given the extensive areas of hard landscaping that are proposed, the proposed street surfaces will need to be considered against the requirements as set out within part C of T4. Significantly, given the significant heritage value of the site, the suitability of the proposed street surface materials and the contribution they make towards enhancing the character of and surrounding architecture of the area will need to be carefully considered. The suitability of the proposed materials will also need to be considered against the requirement to provide a non-slip surface in all weather conditions and to help mitigate against the risk of flooding through being permeable. Further detailed comments should be provided by Design and Conservation, Inclusive Design and Sustainability colleagues regarding this matter. In particular, further additional comments should be sought from the inclusive design officer with regards to the proposed public realm in line with the requirements of policy T4(A)(ii) to provide safe and convenient access. Part F of T4 is also of relevance here, it outlines the requirement for the design of public realm to take into account Hostile Vehicle Mitigation measures, further detailed comments should be sought from Highways colleagues regarding this.

In considering the requirement to promote the positive use of the space by a range of users, notwithstanding the observed benefits highlighted above with regards to opening up the site and the proposed play space provision it is relevant here to consider the very limited quantum of active frontages that are proposed. This is particularly relevant with regards to the proposed new areas of public realm towards the south of the site where there are opportunities to further activate these areas

through providing a range of uses. This would further increase natural surveillance and would help to further attract people into the site from the Archway Town Centre, helping to consolidate the proposed improved connectivity of the site to the Town Centre. It is also relevant here to consider the requirement to provide free and publicly accessible unisex toilets, baby change and drinking water facilities within easy reach of any new or enhanced public realm as required by Part E of T4.

Policy Officer Conclusions:

The Archway Campus site represents a significant development opportunity within the Archway Spatial Strategy area and is the subject of a site allocation which should guide proposals. The site allocation promotes a residential-led development with some commercial and community and social infrastructure. It details that an element of student accommodation may be acceptable where it supports the delivery of a policy compliant amount of affordable housing and does not weigh against the delivery of conventional housing. The site is not allocated for a tall building.

The proposed affordable housing offer is unclear. 51% is specified but there is a lack of information about the extent of the offer with/without grant. This needs to be clarified in order to be able to assess policy compliance and how the use of public subsidy will deliver additionality. The proposal also provides less than the required 70% social rented housing, a fact that has not been adequately explained in the application documents. An explanation of the proposed tenure mix is needed, alongside an exploration of the potential to change some of the LLR units in Block C to social rented housing to achieve compliance with Policy H3 Part J.

Comments above have highlighted concerns with the unit mix of the affordable housing and the quantity of single aspect homes at the development. Additional information is required to evidence the need for 1-bed units in this location, and to explain how the keyworker accommodation would be allocated and managed to maximise benefits for local residents and workers at the Whittington Hospital, for example through keeping the units as starter units in LLR in perpetuity as well as prioritising nominations for local residents.

There is a significant question surrounding the quantum of student accommodation proposed. Is this necessary to support the delivery of conventional housing and a policy compliant level of affordable housing, or could additional conventional housing be provided if the amount of student accommodation was reduced? It is considered that there are elements of the scheme that could otherwise be used for conventional and affordable accommodation to assist with policy compliance and the overall planning balance – for example the use of the Clerkenwell Building. It is understood that a financial viability appraisal has been submitted by the applicant and is being assessed by independent experts.

Despite the allocation for some commercial, community and social infrastructure use of the site only one or possibly two small units are proposed for non-residential use: a commercial/amenity space at the base of the student tower (34sqm) and a commercial and/or community unit at lower ground floor level in Block C (88sqm). However, aside from the requirement to undertake a sequential test and impact assessment there remains a lack of clarity over the use of the unit at the bottom of the student tower, and, while it is suggested that the Block C unit may be leased to the council for 3-years for a community use, there is also a lack of clarity over the terms of the possible lease. This, coupled with the short timeframe proposed, suggests the community offer, if it is provided as proposed will be very limited. The potential to provide a more meaningful commercial and social and community infrastructure offer that would deliver active frontages and better linkages to the town centre in line with the site allocation should be explored. For example, little information has been provided in relation to the proposed use of the student amenity block –could this building potentially provide additional commercial and/or community space?

There is an in-principle policy objection to the proposed tall building on the site. The departure from the development plan represented by the tall building needs to be considered alongside all elements of this scheme. The case officer needs to be satisfied that the benefits provided by the proposals clearly outweigh the policy harm caused by the tall building and other conflicts with the development plan identified above. In addition the tall building is identified as having an impact on LV5 (relevant to policy DH2) – further comments can be provided by Design and Conservation colleagues in relation to this.

There are several points raised in relation to the proposed student accommodation provision. This includes the lack of clarity over the proposed amenity space and concerns over the extent of this including in relation to the height of the tower. There are also concerns that there appears to be no agreement in place with a higher education institution for the occupation of the accommodation, this needs to be clarified and addressed as part of any S106 agreement. No management and maintenance plan has been provided as is required by policy. The proposed scheme also does not meet the policy requirement in Local Plan Policy H6 B and London Plan Policy H15 to provide at least 35% affordable student accommodation – a viability assessment has been submitted and separate comments will be provided on that. Finally, it will be important any temporary non-student use of the PBSA should be clearly ancillary and not disrupt the accommodation of the longer-term resident students with this clearly set out in the s106 agreement.

An element of uncertainty remains with regards to the proposed play-space provision, further consideration should be given to the possibility of incorporating play space suitable for children aged 12+ on site in line with Policy SC2. For example, would it be possible to incorporate some additional play space within the eastern part of the site, this could help to bring activity and meaning to this part of the site. Consistent with comments made above, if the provision of such play-space is found to be unachievable, it will be imperative to engage in detailed discussions with the Greenspace Team to explore the suitability of providing any off-site provision.

With regards to the open space provision, whilst the overall quantum of is welcomed, in line with comments made by the Sustainability Officer there remains questions around the opportunity to incorporate additional green/soft landscaping features helping to maximise biodiversity benefits in line with Policy G4.

Overall, there are a number of areas where further clarification and information are needed in order to demonstrate compliance with relevant policies. There is also a clear policy conflict in relation to the tall building proposed.

7.45 **Public Protection:** raised concern with regard to a lack of mitigation measures to address ground borne noise from the Northern Line which runs underneath the site between Archway and Highgate. The consultation response notes that extensive work was previously carried out at the site in 2016 by Arup to evaluate the ground borne noise from the Northern Line, with noise measurements in 50 proposed rooms across the site in which ground borne noise was clearly audible. The ground borne noise limit of 35dB was exceeded at ground and first floor in the Holborn Union building (Main Range and Admin building). It was agreed at that time that mitigation was required, and this was considered within the 2016 report. The Public Protection Team are not aware of any significant changes on this section of the Northern line since then.

The current application proposes no ground borne noise mitigation and given the comprehensive work proposed Public Protection have raised concerns with the applicant's noise report submitted with the application. As a result, the team have advised that there needs to be further work to investigate this, and conditions relating to this have been recommended.

7.46 **Sustainability Officer**:

<u>Sustainable Design Standards</u>

A BREEAM Domestic Refurbishment 2014 pre-assessment has been submitted which sets out a score of 75.78% which equates to an "Excellent" rating. This is welcomed. However, some clarity is required in terms of which buildings this assessment relates to.

Policy S3 also requires the demonstration of reasonable endeavours to achieve an "Outstanding" rating. The applicant should set out whether this could be achieved, or why this is not possible.

• A Home Quality Mark (HQM) pre-assessment has been submitted for the 3no. new build residential blocks (Blocks A, B and C). The assessment sets out how the current design of the development will achieve 275 credits (55%) which equates to a four-star HQM rating, in line with the requirements of Policy S3, Part B. This is accepted.

- As per Policy S3, Part C, a final (post-construction stage) certified rating of at least "Excellent" as part of a fully fitted assessment within BREEAM New Construction 2018 is required. This applies to the new build PBSA tower (Sui Generis). A BREEAM New Construction 2018 pre-assessment has been submitted which demonstrates a score of 76.90% which equates to an "Excellent" rating. This is accepted. However, Policy S3 also requires the demonstration of reasonable endeavours to achieve an "Outstanding" rating. The applicant should set out whether this could be achieved, or why this is not possible.

- A BREEAM Non-Domestic Refurbishment and Fit Out pre-assessment has also been provided. This relates to the Clerkenwell Building which will be refurbished to deliver student accommodation (Sui Generis). The pre-assessment reports a target score of 71.75% which equates to an "Excellent" rating, as Policy S3, Part D requires. This is accepted. However, it is noted that 71.75% just meets the threshold of 70% for an "Excellent" score. Without a safe buffer, there is a risk that this building may not reach an "Excellent" score, if there are any changes to the design. Is there any scope to improve the score any further? Furthermore, Policy S3 also requires the demonstration of reasonable endeavours to achieve an "Outstanding" rating. The applicant should set out whether this could be achieved, or why this is not possible.

Energy

- Be Lean - The U-values of the new building materials meet or exceed the U-values required in Part L Vol 2 2021 of the Building Regulations. It is also noted that highly efficient double-glazing will be installed throughout the development. High levels of air tightness and reduced thermal bridging will also be achieved.
- Be Clean - It is noted that there is not an existing DHN within close proximity of the development site, however the site is very close to a proposed heat network and is located within a Heat Network Priority and Opportunity Area. However, the development will be future proofed to allow connected into a future DHN should one become available. This is accepted.
- Be Green - A site-wide communal heat network, served by ASHPs for the heating and hot water demand has been proposed. A solar PV array of 54.4kWp is also proposed to serve the new build residential elements. This is welcomed. However, is there any scope to add PVs to the top of the PBSA tower?
- The SDCS has modelled regulated carbon emissions against Part L 2021, in line with the GLA requirements. A site-wide reduction of 68% against Part L 2021 has been reported, with a 68% reduction for the domestic elements and 16% reduction for the non-domestic parts of the development. The SDCS also only reports on regulated emissions. However, Policy S4, Part D (i) requires major developments to achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27% beyond Part L of the 2013 Building Regulations. It is requested that the energy modelling is repeated against Part L 2013 and includes both regulated and unregulated emissions and that regulated and unregulated emissions are calculated for Part L 2021 as well.

Managing Heat Risk

- It appears that CIBSE TM59 assessments have only been undertaken for Blocks A, B and C, as well as the PBSA tower. It is important the modelling is carried out for the whole development in order to demonstrate compliance with Policy S6.
- The SDCS includes information on how the development has been designed to reduce potential for overheating and has considered the cooling hierarchy, as per Policy S6, Parts A-C.
- However, the SDCS does not provide sufficient detail on each level of the hierarchy. The applicant must demonstrate what measures have been employed at each stage of the hierarchy, plus detail exploration of measures that have been discounted and why. In particular:
- The higher levels of the hierarchy must be fully explored to demonstrate that they have been prioritised, and how the use of lower-level energy intensive cooling has been minimised.

Air Quality

- An AQA has been submitted which confirms that the development will be Air Quality Neutral:
- The Dust Risk Assessment has identified the application site as 'High Risk'. However, mitigation measures have been suggested for the construction stage. Following the implementation of these measures, the impacts of dust and emissions, although adverse, will be temporary and 'not significant'.

- The Air Quality Positive Statement (AQPS) also includes mitigation strategies for both construction and operational stage. However, could anything further be done? In particular, relating to the green infrastructure. There appears to be further opportunities for greening around the perimeter of the site, particularly in the southern section of the site around the PBSA tower, Clerkenwell Building and Student Amenity Building, as well as along the eastern edge of the site (along Archway Road). Furthermore, have the different types of plants and trees been considered in the context of air purifying species to help reduce air pollution?

Flood Risk Management

- A Flood Risk Assessment has been submitted that covers surface water, groundwater flooding, fluvial, tidal, sewer and reservoir flooding.
- The development is in a Critical Drainage Area (CDA), but is not in a Local Flood Risk Zone.
- Since the development site is located within Flood Zone 1 and the development is in the 'More Vulnerable' category, the development can be considered appropriate for the proposed use, and therefore passes the Sequential Test. The Exception Test is not required as the site passes the Sequential Test.
- The site's location within a CDA means that SUDS must be prioritised to prevent surface water flooding. Policies S8 and S9 require an integrated approach to water management and flood risk which considers sustainable drainage.

Water Management and SUDS

- The SDCS confirms that mains water consumption of a maximum of 110 litres or less per head per day (excluding an allowance of 5 litres or less per person per day for external water consumption) will be targeted. However, this should be a maximum of 105 litres or less per head per day (excluding an allowance of 5 litres or less for external water consumption) in line with Policy S9, Part M. Can the applicant confirm that this will be the case and will be achieved?
- Has rainwater/greywater recycling been considered? Particularly in terms of the new build blocks where there is more opportunity for this to be designed in. This is especially important in relation to the student accommodation block, which is likely to have a high level of water consumption due to the nature of the development.
- A range of flow control devices have been proposed to regulate the supply of water to each WC area/facility to reduce water wastage and this is welcomed.
- The London Plan Drainage Hierarchy has not been considered.
- Several SuDS measures have been proposed including blue/green roofs, swales, permeable paving and geo-cellular and modular systems - all allowing gradual release of rainwater. However, as mentioned above, these measures must be considered in the context of the London Plan Drainage Hierarchy. The hierarchy must be followed, with each level fully addressed, to ensure that green features are prioritised over grey features. Further information is required.
- It also appears that there still are large areas of impermeable hard surfacing in the southern part of the site (around the student accommodation and student amenity buildings) - "Paving Type 02: Sienna Sett Sandstone by Tobermore or similar". The Urban Greening Factor Map classifies this area as impermeable, which contributes to the UGF score. Policy S9, Part C resists the use of impermeable paving. Clarification is required on this point.
- Furthermore, it does not appear that the coverage of swales and rain gardens have been maximised as far as possible.
- Blue/green roofs are proposed on new build Blocks A, B and C, details of which should be secured with condition. Is it possible to deliver some green/blue roof on the areas of the PBSA tower roof which do not contain plant?
- A maintenance plan has been proposed and submitted as required by Policy S9, Part E.
- The greenfield runoff rate as required by Policy S9, Part F is 8l/s/ha. The site's total area is 1.48ha. This figure should be used to calculate the site's greenfield runoff rate, rather than the total impermeable area, as this is not a policy requirement. As such, the greenfield runoff rate for the whole site is calculated as 11.84l/s (1.48ha x 8l/s).
- The applicant has proposed a runoff rate of 12.40l/s which falls short of the greenfield runoff rate by 2.36l/s. Considering that the whole site will not be developed, this is not insignificant. Reducing the runoff rate as far as possible is also particularly important given the site's location within a CDA. The applicant has not demonstrated that they have minimised this to as close to the greenfield rate as possible, as per Policy S9, Part F (ii). Further options to reduce the greenfield run-off rate should be explored.

- The modelling appears to show that there will be a total runoff rate of 12.4l/s split between three separate existing outfalls. Discharge to Highgate Hill and Tollhouse Way will be at 2.0l/s each, however the remaining 8.4l/s will discharge to Archway Road. This rate is relatively high. Has the applicant explored all possible options to reduce this rate?
- It is noted that correspondence with Thames Water as part of the Pre-Planning Enquiry has indicated that they are not favourable to a complex flow control with a peak flow equivalent to the 1 in 100 year greenfield runoff rate. Can the applicant share the correspondence with Thames Water about complex flow control?
- Excess flows will be attenuated (with an attenuation volume of 1,138 m3) via a mixture buried geo-cellular tanks, tanked permeable paving, and blue roof elements to new build areas. However, the applicant should review the proposed measures (in line with the Drainage Hierarchy) to establish whether there is any scope to increase attenuation and reduce runoff to the greenfield rate.
- It is also noted that the Flood Risk Assessment and Sustainable Drainage Strategy also proposes the use of swales (see paragraph 7.02.3). It does not appear that these have been factored into the attenuation calculation. Clarification is required.

Circular Economy

- Policy S10, Part A requires all developments to adopt a circular economy approach to building design and construction. Policy S10, Part E requires all major developments to provide an Adaptive Design Strategy which outlines this approach. The applicant has submitted a Circular Economy Statement, which sets out how they will comply with a number of circular economy principles. However, some further information is required to demonstrate that all of the requirements in Policy S10 and requirements of the GLA CES Guidance have been addressed.
- The Circular Economy Statement sets out reasons why some of the existing buildings will not be retained. However, it is not considered that all options to retain and reconstruct the existing buildings have been explored and discounted in full, as the GLA CES Guidance requires. This will be considered in more detail in the Whole Life Carbon Assessment section.
- It is noted that the applicant intends to explore opportunities to recycle the existing elements, as well as excavation and demolition waste. A Pre-demolition Justification Report is referred to but has not been submitted. A copy of this report should be provided.
- A target of 20% of build materials to be comprised from recycled or reused content has been set. This is welcomed (Policy S10, Part C requires a minimum of 10%) as is the proposed use of concrete with high GGBS content. However, the proposed % of GGBS should be specified. Has the applicant considered whether any other materials with high-recycled content could be used?
- Will local suppliers be utilised, in line with Policy S10, Part F?
- In terms of designing the development for ease of deconstruction and reuse of materials, it is noted that some general measures have been identified. However, the applicant should be more specific in terms of which materials this would support the recovery of.
- It is noted that a Bill of Materials Table has not been submitted as part of the CES.

Whole Life Cyle Carbon Assessment

- Two separate WLCAs have been submitted for the new build and heritage elements of the development. The Heritage WLCA is also split up into separate buildings. This approach is not accepted and a revised WLCA should be provided which addresses the site as a whole (including both the new build and heritage elements) and sets out the WLC emissions for the entire development.
- It is noted that the Circular Economy Statement provides justification for demolishing a number of buildings on the site. However, the WLCA must adopt a carbon optioneering approach to ensure that all options to retain and reconstruct the existing buildings have been explored, and to fully assess the WLC impacts of demolishing vs retaining these buildings.
- Whole life-cycle carbon emissions have been calculated using One Click LCA in compliance with RICS and GLA requirements. Both reports have also fully addressed the GLA's set Whole Life Carbon Reduction Principles. This is accepted and this approach should be utilised in the revised WLCA.
- The following comments should be taken into consideration when developing the revised WLCA for the whole site:

New Build WLCA

- The New Build WLCA covers the student housing and affordable housing blocks of the site (Blocks A, B, C, and the PBSA tower).
- Upfront carbon (A1-A5) has been estimated at 750 $kgCO_2e/m^2$ GIA. This aligns with the GLA benchmark of 850 $kgCO_2e/m^2$. However, could any other measures be undertaken to further reduce the upfront carbon in line with the GLA aspirational benchmark of 500 $kgCO_2e/m^2$?

- Whole life-cycle carbon (B-C, excluding B6-B7) has been estimated at 631 $kgCO_2e/m^2$ GIA. This fails to meet the GLA benchmark of 350 $kgCO_2e/m^2$ and the aspirational benchmark of 300 $kgCO_2e/m^2$. This is a concern and must be addressed.
- Whole life-cycle carbon (A-C, excluding B6-B7) has been estimated at 1,381 $kgCO_2e/m^2$ GIA. This fails to meet the GLA benchmark of 1,200 $kgCO_2e/m^2$ and aspirational benchmark of 800 $kgCO_2e/m^2$. This is a concern and must be addressed.
- The WLCA demonstrates a lack of consistency with the GLA benchmarks, particularly at stages B-C. This is a serious concern and must be addressed through further consideration of the approach to development and proposed materials.

Heritage WLCA

- The Heritage WLCA covers the Charterhouse Building, Clerkenwell Building and Holborn & Admin Building, all of which will be retained and refurbished.
- Upfront carbon (A1-A5) has been estimated at 578 $kgCO_2e/m^2$ GIA (Charterhouse Building), 679 $kgCO_2e/m^2$ GIA (Clerkenwell Building) and 809 $kgCO_2e/m^2$ GIA (Holborn & Admin Building). All three buildings fall below the GLA benchmark of 850 $kgCO_2e/m^2$. However, could any other measures be undertaken to further reduce the upfront carbon in line with the GLA aspirational benchmark of 500 $kgCO_2e/m^2$? This is particularly pertinent since this aspect of the development involves retaining existing structures. The upfront carbon should therefore be low, and potentially capable of achieving the GLA aspirational benchmark.
- Whole life-cycle carbon (B-C, excluding B6-B7) has been estimated at 648 $kgCO_2e/m^2$ GIA (Charterhouse Building), 766 $kgCO_2e/m^2$ GIA (Clerkenwell Building) and 523 $kgCO_2e/m^2$ GIA (Holborn & Admin Building). All three buildings fail to meet the GLA benchmark of 350 $kgCO_2e/m^2$ and the aspirational benchmark of 300 $kgCO_2e/m^2$ (albeit to varying degrees). This is particularly concerning since this element of the development involves retaining and refurbishing existing buildings. The applicant must consider options to reduce carbon emissions and achieve the GLA benchmarks. Is there scope to retain more of the existing building materials beyond the façades?
- Whole life-cycle carbon (A-C, excluding B6-B7) has been estimated at 1,266 $kgCO_2e/m^2$ GIA (Charterhouse Building), 1,445 $kgCO_2e/m^2$ GIA (Clerkenwell Building) and 1,332 $kgCO_2e/m^2$ GIA (Holborn & Admin Building). All three buildings fail to meet the GLA benchmark of 1,200 $kgCO_2e/m^2$ and aspirational benchmark of 800 $kgCO_2e/m^2$. Again, to varying degrees. The Charterhouse Building just exceeds the 1,200 GLA benchmark, however the Holborn & Admin Building and the Clerkenwell Building are significantly exceeding the GLA benchmark. The WLCA sets out how the carbon emissions could be further reduced and optimised during the coming design stages. However, the applicant should review the designs to establish whether the emissions can be further reduced at this stage.
- Overall, there are significant concerns with the applicant's approach to WLC modelling. The WLCA must be revised to take a whole-site approach, which includes carbon optioneering to ensure that all options to retain and reuse existing buildings have been explored. If demolition is still proposed, it will be necessary to fully assess the WLC impacts of retention vs demolition. Furthermore, the GLA benchmarks have not been achieved across different parts of the site. The revised WLCA must address this. The applicant should review the development approach, as well as the proposed materials, to ensure that GLA benchmarks are achieved for the site as a whole.

Biodiversity, Landscape Design and Trees

- A UGF score of 0.5 has been achieved which exceeds the 0.4 target (as required in Policy G1, Part E) for residential-led development. However, it should be explored if this could this be improved further. Greening improvements including additional SuDS measures, planting to improve air quality outcomes, and the delivery of 10% BNG, would all contribute to a higher UGF score and should be fully explored.
- A Biodiversity Gain Plan has been submitted which proposes an 8.54% biodiversity net gain, which falls short of the 10% biodiversity net gain requirement. The applicant is exploring offsite enhancement opportunities within Archway Park. However, this is not accepted. The Biodiversity Gain Hierarchy states that all onsite habitats which are adversely affected by the development should be compensated by prioritising the enhancement of existing onsite habitats as a first step, followed by the creation of new onsite habitats. All potential onsite measures must be exhausted before offsite opportunities can be considered.
- The SDCS states that bird boxes will be installed. This is welcomed, in line with the recommendations of the Preliminary Ecological Appraisal. The SDCS refers to woodcrete type/ house sparrow boxes. The type and location of the boxes should be considered as early as possible in the design process, however the details can be secured via condition.

- It does not appear that bat boxes have been proposed. Further information is requested at this stage. Although details can be secured via condition, the applicant is encouraged to incorporate the provision of bat boxes into the design as early as possible.
- The Bat Survey Report provided recommendations for supporting bats. Has this been taken into consideration as part of the landscape design?
- The development will result in the loss of four category 'B' trees, 17 category 'C' trees and four groups of category 'D' trees. All category 'A' trees, including those covered by a TPO have been retained as part of the proposals. 90 new small trees will be planted on the site. Policy G4, Part H which states that any loss of trees will only be permitted where it is demonstrably unavoidable, in order to meet other relevant Local Plan policy requirements. It sets out a hierarchy in which the loss must be mitigated. The first level of the hierarchy involves replacing tree provision on site.
- It is noted that all retained trees will be protected during every stage of development by establishing a Construction Exclusion Zone (CEZ) around their RPAs.
- A Landscape and Public Realm Statement has been provided by further information is required in terms of the species selection and maintenance plan.
- As mentioned in relation to air quality, SUDS, UFG and BNG, the design of the development includes considerable areas of hard landscaping, which would lend itself to further greening and landscaping, particularly in the south of the site. The landscape design should be further reviewed to determine whether any additional greening/planting could be delivered. This must be considered in a holistic manner.
- The Preliminary Ecological Appraisal (PEA) recongises that the site is within close proximity (approx. 50m) of Archway Park SINC. However, the PEA does not consider how a stronger connection between the development site and the SINC could be facilitated. The Landscape and Public Realm Statement proposes the reinstatement of an entrance on the south eastern edge of the site, to create a link to Archway Park. Whilst the physical linkage to the park is welcomed, it is considered that the landscape design of the development site could be developed to further enhance connectivity to the SINC, in line with Policy G4.
- The Landscape and Public Realm Statement refers to a lighting strategy, although further detail has not been provided at this stage. As stated within the Bat Survey Report, a sensitive lighting regime must take into consideration the impact it might have on bats (during both the construction and operational phase of works). Has this been considered?

<u>Green Roof and Vertical Greening</u>

- Blue/green roofs are proposed on the new build Blocks A, B and C which is welcomed. The applicant must also confirm whether the green roof been extended to stretch below the PVs to create a bio-solar roof.
- Noted that a blue/green roof has not been included on top of the student accommodation tower. It is recognised that there are some limitations due to extensive plant and energy centre located on the roof. Green roofs should be provided on any elements of the roof not covered by plant. Further consideration is required.
- Blue/green roofs have not been proposed on the pitched roofs of the refurbished existing buildings (i.e. Holborn & Admin, Clerkenwell and Charterhouse). This is accepted.
- It is noted that the rooftop planters will be interlinked and potentially irrigated using a rainwater harvesting system. Could any further information regarding the irrigation/rainwater harvesting be provided at this stage?
- Further details of the blue/green roofs and green walls can be secured via condition.
- However, can the applicant confirm that vertical greening has been maximised as far as possible across the development site?

7.47 **Refuse & Recycling:** No objections to proposal. Apart from 4.9 which relates that bins will be presented on sites over 10metres. Would need the detailed information, once the works have commenced. Refuse collection will be undertaken on site and from Highgate Hill. A refuse collection vehicle will access the site from the access on Archway Road and route through the site. Refuse vehicles would be granted access to the traffic free central spine road and as such would be able to travel in an anticlockwise direction around the loop road within the site. Refuse collection would also be undertaken from the proposed loading bay located on Highgate Hill. The swept path analysis drawing at Appendix D shows that an 11.2m refuse could access and egress this bay in forward gear. Bins that are located outside of recommended drag distances will be moved by on-site management to a temporary store location on collection days. Once collected these bins will be returned to their original stores.

7.48 **Tree Officer:** Raised an objection to the proposals on the basis that they are contrary to Local Plan policies G1 and G4. Advised that proposed buildings A, B, and C would be located in too close proximity to the mature Plane trees along Highgate Hill, with the new buildings being in touching distance (or within) the existing tree canopies. This would result in significant problems for future residents, as seasonal debris from the trees would collect on balconies and windows. Furthermore, to facilitate construction, these TPOd trees would need to be pruned significantly beyond what is considered acceptable which could cause long term damage. In addition to the required pruning, proposals to carry out significant ground level reductions and introduce sheet pile foundations within root protection areas would result in significant damage and harm to existing tree roots.

Raised significant concerns with proposed landscaping scheme, with the proposed planting not considering the requirements of the existing trees and potentially causing further root damage. Advised that the proposed tree species do not adequately consider climate change adaptation and do not include any large trees, which have the biggest ecological and amenity benefits. Furthermore, the proposed concrete play elements would cause further significant damage to tree roots of existing trees.

Noted that the UGF calculations do not take in to account the reduction tree canopies and advised that it the existing canopy sizes would not be achieved again were the development to be built.

Noted that the Daylight and Sunlight Assessment does not account for shading from existing trees.

8 RELEVANT STATUTORY DUTIES & DEVELOPMENT PLAN CONSIDERATIONS & POLICIES

8.1 This report considers the proposal against the following development plan documents.

National Guidance

8.2 National Planning Policy Framework 2024 (NPPF): Paragraph 10 states: “at the heart of the NPPF is a presumption in favour of sustainable development”.

8.3 The NPPF 2024 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. Paragraph 8 of the NPPF states: ‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

8.4 The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.

8.5 Since March 2014 Planning Practice Guidance for England has been published online.

8.6 In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

8.7 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:

- Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

- Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

8.8 In line with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in assessing the proposals hereby under consideration, special regard has been given to the desirability of preserving the Conservation Area, its setting and any of its features of special architectural or historic interest.

8.9 In line with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has been given to the desirability of preserving the adjoining listed buildings, their setting and any of their features of special architectural or historic interest.

Development Plan

8.10 The Development Plan is comprised of the London Plan 2021, Islington Strategic and Development Management Policies (2023), and Site Allocations (2023). The policies of the Development Plan that are considered relevant to this application are listed below.

A) The London Plan 2021 - Spatial Development Strategy for Greater London

1. Planning London's Future - Good Growth
Policy GG1 Building strong and inclusive communities
Policy GG2 Making the best use of land
Policy GG5 Growing a good economy

3. Design
Policy D1 London's form, character and capacity for growth
Policy D3 Optimising site capacity through the design led approach
Policy D4 Delivering good design
Policy D5 Inclusive design
Policy D6 Housing quality and standards
Policy D7 Accessible housing
Policy D8 Public Realm
Policy D9 Tall buildings
Policy D10 Basement development
Policy D11 Safety, security and resilience to emergency
Policy D12 Fire safety
Policy D14 Noise

4. Housing
Policy H1 Increasing housing supply
Policy H4 Delivering affordable housing
Policy H5 Threshold approach to applications
Policy H6 Affordable housing tenure
Policy H7 Monitoring of affordable housing
Policy H10 Housing size mix
Policy H15 Purpose-built student accommodation

5. Social Infrastructure
Policy S2 Health and social care facilities
Policy S3 Education and childcare facilities
Policy S4 Play and informal recreation

7. Heritage and Culture
Policy HC1 Heritage conservation and growth
Policy HC3 Strategic and Local Views
Policy HC4 London View Management Framework

8. Green Infrastructure and Natural Environment
Policy G1 Green infrastructure
Policy G4 Open space
Policy G5 Urban Greening
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodlands

9. Sustainable Infrastructure
Policy SI1 Improving air quality
Policy SI2 Minimising greenhouse gas emissions
Policy SI4 Managing heat risk
Policy SI5 Water infrastructure
Policy SI7 Reducing waste and supporting the circular economy
Policy SI12 Flood risk management
Policy SI13 Sustainable drainage

10. Transport
Policy T2 Healthy Streets
Policy T3 Transport capacity, connectivity and safeguarding
Policy T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car parking
Policy T6.1 Residential parking
Policy T7 Deliveries, servicing and construction

E) Islington Local Plan – Strategic and Development Management Policies (2023)

1. PLAN01 Site appraisal, design principle and process

2. Area Spatial Strategies
Policy SP7 Archway

3. Thriving Communities
Policy H1 Thriving communities
Policy H2 New and existing conventional housing
Policy H3 Genuinely affordable housing
Policy H4 Delivering high quality housing
Policy H5 Private outdoor space
Policy H6 Purpose-built Student Accommodation
Policy SC1 Social and Community Infrastructure
Policy SC2 Play space

6. Sustainable Design
Policy S1 Delivering Sustainable Design
Policy S2 Sustainable Design and Construction
Policy S3 Sustainable Design Standards
Policy S4 Minimising greenhouse gas emissions
Policy S5 Energy Infrastructure
Policy S6 Managing heat risk
Policy S7 Improving Air Quality
Policy S8 Flood Risk Management
Policy S9 Integrated Water Management and Sustainable Drainage
Policy S10 Circular Economy and Adaptive Design

7. Public Realm and Transport

Policy SC3 Health Impact Assessment **4. Inclusive Economy** **Policy R3** Islington's retail hierarchy **5. Green Infrastructure** **Policy G1** Green infrastructure **Policy G2** Protecting open space **Policy G3** New public open space **Policy G4** Biodiversity, landscape design and trees **Policy G5** Green roofs and vertical greening	**Policy T1** Enhancing the public realm and sustainable transport **Policy T2** Sustainable Transport Choices **Policy T3** Car-free development **Policy T4** Public realm **Policy T5** Delivery, servicing and construction **8. Design and Heritage** **Policy DH1** Fostering innovation while protecting heritage **Policy DH2** Heritage assets **Policy DH3** Building heights **Policy DH4** Basement development **Policy DH5** Agent-of-change, noise and vibration **9. Strategic infrastructure** **Policy ST2** Waste

Supplementary Planning Guidance (SPG) / Document (SPD)

8.11 The following SPGs and/or SPDs are relevant:

London Plan

- Purpose Built Student Accommodation LPG (2024)
- Housing Design Standards LPG (2023)
- Affordable Housing and viability SPG (2017)
- Affordable Housing Draft LPG (2023)
- Development Viability Draft LPG (2023)
- Circular Economy Statements LPG (2022)

Islington

- Islington Urban Design Guide (2017)
- Inclusive Design SPD (2014)
- Islington Streetbook SPD (2012)
- Landscape Design Guide SPD
- Environmental Design SPD (2012)
- Basement Development SPD (2016)
- Planning Obligations SPD (2016)

Designations

8.12 The site has the following designations under the London Plan 2021, Islington Core Strategy 2011, Development Management Policies 2013, and Site Allocations 2013:

- Site Allocation (ARCH5)
- Holborn Union Infirmary Conservation Area (CA41)
- Locally Listed Buildings
- Local View - LV4 Archway Road to St Paul's Cathedral
- Local View - LV5 Archway Bridge to St Paul's Cathedral
- Adjacent to Grade II listed Whittington Hospital
- Adjacent to St John's Grove Conservation Area (CA28)
- Within 90m of Highgate Hill/ Hornsey Lane Conservation Area (CA30)
- Within 75m of Whitehall Park Conservation Area (CA7)
- Opposite St. Anthony's Leper Hospital, Chapel and Cross Archaeological Priority Area (Grade Tier 2)
- Adjacent to Strategic Cycle Route (Archway Road, Tollhouse Way)
- Tree Preservation Orders (TPOs)

9 ASSESSMENT

9.1 The main issues arising from this proposal relate to:

- Land Use Principles
- Affordable Housing
- Student Accommodation
- Financial Viability
- Design, Conservation and Heritage Considerations
- Quality of residential Accommodation
- Quality of Student Accommodation
- Accessibility and Inclusive Design
- Neighbouring Amenity
- Energy and Sustainability
- Biodiversity, Landscaping and Trees
- Structural Method Statement
- Highways and Transport
- Fire Safety
- Safety and Security
- Planning Obligations and CIL
- Environmental Impact Assessment

Land Use Principles

Social and Community Infrastructure Use

9.2 The existing buildings on the site are currently vacant and its most recent authorised use was by Middlesex University, University College London (UCL) and the Whittington Health NHS Trust for health and educational purposes. This ended in 2013 following the relocation of the medical school. In 2015 there was an unauthorised change of use. However, following a planning enforcement investigation the unauthorised use ceased without enforcement action being taken and the buildings have remained vacant since. Given the unauthorised use , there is no right to revert to the former lawful use without permission.

9.3 Policy SC1 Part E sets out that the council will not permit any loss of social and community infrastructure uses unless (i) a replacement facility is provided on-site; (ii) the existing use is not required on-site, demonstrated through the provision of marketing and vacancy evidence; or (iii) the proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's estates programme. Notwithstanding the unauthorised use of the site, it is considered that in this case Part E (iii) would apply as the site was owned by recognised public sector bodies and made vacant as part of an estates rationalisation programme.

9.4 Following a review in 2012, UCL considered Archway Campus 'unsuitable to continue to accommodate higher education provisions in its current state … and a prohibitive level of investment would be required to update the campus to an acceptable standard'. The decision was made to vacate and dispose of the site. The Medical School and UCL Division of Medicine and Engineering who were occupying the site at the time were relocated to the Whittington Hospital, the Royal Free Hospital in Hampstead, and to parts of UCL's campus in Bloomsbury.

9.5 Within the Islington Local Plan (2023) the site is now subject to Site Allocation ARCH5 which allocates the site fora residential-led development. The site allocation states the following:

> *"Residential-led development, with some commercial and community and social infrastructure uses on the ground floor. Active frontages are sought on the southern part of the site and elsewhere, where appropriate, where it can make a contribution to the public realm.*
>
> *Given the very limited supply of development land in Islington policies strongly prioritise the most urgent need, which is conventional housing. An element of student housing may be acceptable as part of the development mix, provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing*

on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant."

9.6 As such, it is considered that the loss of the social and community infrastructure as part of a proposal that would deliver conventional housing, inclusive of a policy compliant level of affordable housing would be acceptable in principle, subject to a detailed assessment of all other relevant matters.

Conventional Housing

9.7 The London Plan supports the building of more homes through Policy GG4, which promotes the delivery of genuinely affordable homes and the creation of mixed and inclusive communities, with good quality homes that meet high standards. Policy GG2 requires development proposals to make the best use of land by enabling development on brownfield land well-connected by public transport and by applying a design-led approach to determine the optimum development capacity of sites.

9.8 The London Plan also supports increasing housing supply and optimising housing potential through Policy H1, which states that the potential for housing delivery on all suitable and available brownfield sites should be optimised.

9.9 The Islington Local Plan, at Policy H1 supports the delivery of genuinely affordable housing that is integrated and inclusive providing places where people of different incomes, tenures and backgrounds can live in mixed and balanced communities, which are economically, environmentally and socially healthy and resilient. Policy H1 also supports high density housing development and requires that proposals which include housing must make the most efficient use of land to ensure that the optimal amount of housing is delivered, while having regard to other Development Plan policies and the specific site context.

9.10 Local Plan Policy H2 states that Islington aims to meet and exceed the borough's housing target. Further, development proposals involving new housing must demonstrate that the use of the building/site is optimised. Particular consideration must be given to the contribution that a proposal makes to meeting need for particular types of housing; the contribution to meeting the borough's housing targets, the level of housing density; and social and strategic infrastructure requirements and impacts on existing and/or planned infrastructure.

9.11 Given the above, and the site allocation, it is considered that the principle of introducing conventional housing to the site could be supported. However, for the reasons detailed in the following sections, it is considered that the scheme as a whole fails to make the most efficient use of the land in failing to ensure that the optimal amount of conventional housing is delivered, nor that it maximises the delivery of genuinely affordable homes and introduces an unjustified quantum of student accommodation, such that it would be contrary to policy.

Affordable Housing

9.12 London Plan Policies H4 and H5 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. These policies in conjunction with the Mayor's Affordable Housing and Viability SPG; Affordable Housing draft LPG; and Development Viability draft LPG seek to increase the provision of affordable housing in London and embed affordable housing policy requirements into land prices.

9.13 To be eligible to follow the Fast Track Route, London Plan Policy H5 and the Affordable Housing and Viability SPG set a threshold of 35% affordable housing or 50% on industrial or public land (irrespective of grant funding). Paragraph 4.5.5 of the London Plan and Paragraph 2.36 of the Affordable Housing and Viability SPG provide a definition for public sector land, which includes land that has been released from public ownership and on which housing development is proposed. In accordance with this definition, the site, which was previously in public ownership and public land, and the scheme comprising housing development would mean that, for the purposes of Fast Track Route eligibility, the development would be required to provide at least 50% affordable housing or would be required to follow the Viability Tested Route. It is noted the Islington Local Plan requires 50% affordable housing by unit on this site.

9.14 Development is also required to meet the specific tenure mix set out in London Plan Policy H6.

9.15 SDMP Policy H3 (Genuinely Affordable Housing) Part D states that:

"All sites which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more, and which are currently or have been in public sector ownership (either part or full public ownership) must:

(i) provide 50% on-site affordable housing (by net additional unit) without public subsidy; and

(ii) demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% (by net additional unit) have been utilised, and demonstrate additionality delivered using any and all forms of public subsidy."

9.16 The supporting text to Policy H3 at paragraph 3.40 states that:

"Sites which are currently or have been in public ownership must provide at least 50% affordable housing on-site, without public subsidy (such as grant funding); this applies to sites owned or in use by a public sector organisation, or company or organisation in public ownership; or land that has been released from public ownership, having previously been owned or in use (at any point in the past) by a public sector organisation, or company or organisation in public ownership. Public sector sites are (or have been) public assets and therefore there is a reasonable expectation that such sites should prioritise affordable housing which helps address housing needs."

9.17 As a site formerly in public ownership, Policy H3 part D requires the site to provide 50% on-site affordable housing (by net additional unit) without public subsidy and demonstrate how all public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised.

9.18 By unit number, the affordable housing offer comprises 51% of the proposed dwellings. However, the submitted Financial Viability Assessment (FVA) sets out that the offer includes an assumed £6.9 million in grant funding, which the applicant is yet to secure from the GLA. The GLA has not yet confirmed this grant will be made available or that it is the maximum amount that may be secured. The proposal therefore immediately fails to comply with Part D(i) of Policy H3 as the delivery of 50% affordable housing is reliant upon public subsidy.

9.19 The Financial Viability Assessment fails to demonstrate how all the public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised in accordance with Policy H3 Part D(ii).

9.20 As detailed in the 'Financial Viability' section below, the submitted FVA includes a number of assumptions and inputs that have been contested by the Council. These include, but are not limited to, the Benchmark Land Value; values for accommodation; and financing. Given this, it is considered that the FVA does not provide any justification for the proposed quantum of affordable housing, the tenure split nor the lack of affordable student housing provision (see below).

9.21 Notwithstanding that the detail within the submitted FVA is contested, in failing to provide 50% on-site affordable housing without public subsidy and not demonstrating how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised, the proposal would be contrary to Local Plan: Strategic and Development Management Policies (2023) Policy H3, The Islington Site Allocations (2023) - Site Allocation ARCH5 and London Plan Policy H4.

Tenure Split

9.22 London Plan Policy H6 and the Affordable Housing and Viability SPG set out a preferred tenure mix for market housing schemes of at least 30% low cost rent (social or affordable rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority as low-cost rented homes or intermediate products based on identified need. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases flexibility may be appropriate, for example due to viability constraints or to achieve more mixed and inclusive communities.

9.23 The Council's SDMP Policy H3 Part J sets out that the tenure split of on-site affordable housing should be 70% social rented housing and 30% intermediate housing, with the majority of intermediate homes provided at London Living Rent. The applicant's affordable housing offer breaks down into 64% (58 homes units) social rent and 36% (33 homes) intermediate accommodation provided at

London Living Rent levels in perpetuity. This is not a policy compliant tenure split and justification for the deviation from the policy requirement has not been submitted or justified in the applicant's Affordable Housing Statement.

9.24 With regard to the intermediate housing, the applicant has proposed this as 'keyworker accommodation', with the Affordable Housing Statement stating that the applicant is in discussions with Whittington Health NHS Trust about how the proposed keyworker housing should be administered. This includes the Trust taking ownership of the intermediate homes and letting them directly, or a Registered Provider managing the units with a nominations agreement with the Trust and wider NHS.

9.25 While the NHS has indicated a need for affordable homes for NHS staff in North and Central London, evidence indicates that the most significant need is for 2-bedroom homes. These are not currently proposed in the intermediate tenure, which comprises of 5 studios and 28 one-bedroom two person homes. Also, while the NHS evidence sets out a significant need across a spectrum of household types for NHS staff, it is noted that the Council's Housing Strategy and Local Plan are both clear in detailing that the delivery of social rented accommodation best meets Islington's housing needs.

9.26 Islington's Local Plan does not give priority to key workers in the allocation of intermediate housing. It is acknowledged that the GLA has recently consulted upon plans to deliver 'Key Worker Living Rent Homes'. However, this does not represent planning policy and isn't currently relevant to the considerations of the planning application.

9.27 It is noted that the applicant does not intend to use any grant funding to increase the delivery of on-site affordable housing in excess of the 51% offered and to increase the percentage of social rented housing in order to deliver a policy compliant tenure split.

9.28 The proposal is therefore considered to be contrary to Policy H3 Part J and also fails to ensure that the development achieves a fully policy compliant quantum and the tenure of affordable housing in accordance with the requirements of Site Allocation ARCH5 and Local Plan Policy H3. As a result, this weighs against the scheme in the planning balance.

Residential Unit Size Mix

9.29 Local Plan Policy H2 Part E states that concentrations of one-bedroom homes – overall and as part of constituent market and affordable elements of a proposal – will not be acceptable.

9.30 In total, out of the 91 f affordable homes proposed, 52 homes (57%) would be one-bedroom homes. It is noted that no demand for studio units is identified in Table 3.2 of the SDMP (2023), which outlines the housing size mix priorities for each tenure. In addition, low or medium priority is given to one-bed social rented homes and medium priority is given to one-bed intermediate rent homes at London Living Rent levels. In contrast, high priority is given to two--bed social rented homes, with the proposal including 23 two-bedroom homes out of 91 units. However, the supporting policy text to Local Plan Policy H2 does accept that 'affordable housing in particular may require a different mix to address short term changes in need/demand'.

9.31 The unit mix of the proposed 87 market homes is more varied – with no studios, 23 x one-bedroom homes, 28 x two-bedroom homes, 33 x three-bedroom homes and 3 x four-bedroom homes. Table 3.2 of the SDMP (2023) indicates there is low priority for one-bedroom market homes, a high priority for two-bedroom market homes, medium priority for three-bedroom market homes and low priority for four-bedroom market homes. As such, it is considered that there is a more modest over-concentration of one-bedroom homes proposed, as well as an over-provision of three-bedroom homes.

9.32 In conclusion, 75 out of the 178 conventional homes across the scheme, equivalent to 42%, would be one-bedroom homes. Insufficient evidence has been provided by the applicant to justify the proposed mix and the high proportion of one-bedroom homes in the affordable housing component of the development in particular. This over-concentration of one-bedroom homes conflicts with Policy H2 Part E and this weighs negatively against the scheme in the planning balance.

Student Accommodation

9.33 London Plan Policy H15 seeks to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed and sets out requirements for PBSA developments. Paragraph 4.15.2 of the London Plan specifies that the Mayor's Academic Forum has established that there is an annual requirement for 3,500 PBSA bed spaces over the plan period.

9.34 Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London and that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. Furthermore, the provision of high-density student accommodation can (theoretically) help free up existing housing stock in the private rented sector, noting that London Plan Policy SD1 seeks housing choice for Londoners. However, it has not been demonstrated that the proposed introduction of a significant quantum of student housing on the site would not lead to an unacceptable over provision of student accommodation within this part of the borough.

9.35 SDMP Policy H6 Part A sets out the locations where student accommodation will be permitted, which include sites allocated for this use. As previously noted, Site Allocation ARCH5 proposes a residential-led development, and indicates that conventional housing is strongly prioritised. It identifies that an element of student housing may be acceptable as part of the development mix, provided that it can ensure the development can achieve the fully policy compliant quantum and tenure of affordable housing.

9.36 The student housing component is included in the site allocation as an ancillary enabling use, designed to cross subsidise the delivery of a policy compliant amount of on-site conventional affordable housing. It is not intended to be a primary use on the site.

9.37 A total of 242 self-contained student studios are proposed along with associated facilities and student amenity spaces. Using the floor areas detailed within the submitted Planning Statement this represents 31%, or almost one third of the proposed floorspace within the development. Considering this, together with the student element being located within the most prominent element of the scheme, the tall building at the south of the site, the student accommodation cannot be considered to be an 'element'.

9.38 As noted above and below, the inputs and assumptions within the submitted FVA, inclusive of the values associated with the student accommodation, are contested and are not considered to be sufficient to demonstrate the viability of the proposals. Considering this, together with the failure to demonstrate the delivery of a policy complaint affordable housing offer (both in terms of quantum and tenure) and that the submitted FVA seeks to demonstrates that the scheme is in deficit, it is considered that insufficient justification has been submitted to demonstrate that the proposed student accommodation is required and does not weigh against the provision of conventional housing.

9.39 Turning to the type of student accommodation proposed, in line with London Planning Policy H15, Islington Local Plan Policy H6 Part B (vi) requires 35% of the student accommodation to be provided as affordable student accommodation. This is typically provided in cluster flat layouts, with shared communal facilities. The proposals seek to deliver studio units across all floors and no provision of affordable student accommodation is proposed. The applicant considers that specific site circumstances, namely that the student accommodation would cross subsidise conventional affordable housing, is sufficient to justify the lack of provision of affordable student accommodation. For the reasons noted above and in the 'Viability Assessment' section below, it has not been demonstrated that the provision of student accommodation would deliver a policy complaint quantum and tenure conventional affordable housing, and therefore the failure to deliver affordable student accommodation would be contrary to policy.

9.40 Furthermore, in accordance with Local Plan Policy H6, Part B (iv), the applicant has not sought to demonstrate, through a binding nomination agreement, that the student accommodation would only be occupied by students of one or more higher education provider(s). This policy notes that priority must be given to higher education providers in close proximity to the proposed accommodation in the first instance, then those located elsewhere within the borough.

9.41 In failing to provide affordable student accommodation the proposal is contrary to London Plan Policy H15 Part A (4.a) and Local Plan Policy H6 Part B (vi). This weighs negatively against the proposal in the planning balance.

9.42 Given that it has not been adequately demonstrated that the proposed student accommodation would not weigh against both the provision of priority conventional housing on the site, nor that it would ensure the delivery of a policy compliant quantum and tenure of affordable housing, together with the failure to deliver 35% affordable student accommodation, a binding nominations agreement with one or more higher education providers nor that the proposal would not result in an over provision of student accommodation in the town centre, the introduction of a student use is not

considered to be acceptable in this case and would be contrary to London plan Policy H15, Local Plan Policy H3 and H6, and Site Allocation ARCH5 of the Islington Local Plan Site Allocations.

Commercial Uses

9.43 London Plan Policy E9 promotes sustainable access to goods and services for all Londoners in line with the wider objectives of the Plan.

9.44 Local Plan Policy PLAN1, part B requires development to 'sustain and reinforce' a variety and mix of uses, in line with relevant land use priorities as set out within the Local Plan. Moreover, and of particular relevance owing to the site's proximity to the Archway town centre, Policy SP7 expects development within the Archway Spatial Strategy Area to support the commercial function of the area, particularly the retail function of the town centre.

9.45 Consistent with this, the site allocation (ARCH5) sets out an expectation for "some commercial and community and infrastructure uses", with active frontages in particular sought on the southern part of the site and "where it can make a contribution to the public realm". The site allocation also suggests that development of the site should provide linkages to the Archway Town centre in line with PLAN1, part B which requires development to improve permeability and take all opportunities to repair fragmented urban form. Proposals are expected to improve safety and promote positive social contact through the creation and enhancement of effective places to dwell.

9.46 In terms of permeability the proposal would provide an improvement on the current situation with regards to better connecting the site to the Archway town centre, through the opening up the south of the site and creating new areas of public realm. The opportunity to provide active ground floor uses that draw people across Navigator Square from the town centre into the space would help to further enhance this, whilst also helping to activate the proposed new areas of public realm.

9.47 Despite this, only a limited amount of active ground floor uses are proposed. This includes an 88sqm commercial unit within the ground floor of Block C, seeking a flexible use under Use Class E (Commercial, Business and Service) and Use Class F2 (Local Community Uses). While the site allocation encourages some commercial and community and infrastructure uses, with active frontages, this is not considered to be an overly prominent location in which to contribute towards helping to activate the proposed public realm, particularly with regards to the proposed civic square at the south of the site.

9.48 In addition to this, the proposal includes a 28sqm area of commercial floorspace within the ground floor of the student tower, described as 'commercial/amenity space'. Within the Design and Access statement (P.236) it is suggested that this space may host a small café or coffee shop. However, the intended use of this space remains unclear, and this additional commercial floorspace is not referenced within the accommodation summary provided within Table 7 in the applicant's Planning Statement. As such, it is not clear what use class this space is intended to be or whether this space will be open to the public or whether it will be exclusively accessible to occupiers of the student accommodation.

9.49 The provision of some commercial uses within the ground floor of both the student tower and accompanying student amenity building is considered to represent a suitable location for the provision of additional commercial floorspace, helping to activate the public realm in line with Policy T4(A)(v). Moreover, given that the southern part of the site is just outside of the town centre boundary, this would help to further connect the site to the Archway Town Centre, in line with the requirements of the allocation, SP7 and PLAN1. As such, the proposed non-residential floorspace is supported in land use terms.

9.50 Notwithstanding the limited amount of retail/commercial floorspace proposed by this application, owing to the site's location in an edge-of-centre location, the requirements of SDMP Policy R3, Part F will need to be satisfied, these requirements are reproduced below:

> *Any proposal for main Town Centre uses in an edge-of-centre location outside LSAs or in an out-of-centre location must:*
>
> *(i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the Council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and*

(ii) *provide an impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or LSAs.*

9.51 Supporting paragraph 4.97 provides further guidance, it confirms that the requirement to meet the sequential test does not apply to F1/F2 uses, instead applications for such uses will be assessed against Local Plan Policy SC1, which states that where new social and community infrastructure is provided on-site it should be designed in line with criteria in Part H and must:

(i) be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;

(ii) provide buildings that are inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants;

(iii) provide appropriate drop-off/pick-up facilities for disabled people;

(iv) be sited to maximise shared use of the facility, particularly for sports, recreational and community uses; and

(v) complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.

9.52 In addition, Part I of Policy SC1 requires proposals involving new social and community infrastructure to provide free, publicly available provision of accessible toilet, baby change and drinking water facilities.

9.53 Having regard to the above policy criteria, the proposed commercial unit at the ground floor of Block C is considered to broadly align with the requirements for community infrastructure facilities. Should the application be approved then additional measures such as ensuring the counter and signage/façade would be compliant with inclusive design requirements would be to be secured by relevant conditions.

Land Use Conclusion

9.54 The proposal fails to provide 50% on-site affordable housing without public subsidy and in turn fails to demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised, and demonstrate additionality delivered using any and all forms of public subsidy. The proposal is therefore considered to be contrary to Local Plan Policy H3 Part D (i) & (ii) the Site Allocation ARCH5.

9.55 In addition, the proposal fails to provide a policy compliant affordable housing tenure split for the social rented housing and intermediate housing. The proposal is therefore considered to be contrary to Local Plan Policy H3 Part J and the Site Allocation ARCH5.

9.56 In terms of student accommodation, the proposal fails to demonstrate that the proposed quantum of student accommodation would not weigh against both the provision of priority conventional housing on the site nor that it would ensure the development could achieve a quantum and tenure of affordable housing which is fully policy complaint. Further, the proposal fails to provide any affordable student housing, and it has not been demonstrated through a binding nomination agreement, that the accommodation would only be occupied by students of one or more higher education provider. As such, the introduction of student accommodation is considered not to be acceptable and would be contrary to Local Plan: Site Allocations (2023) - Site Allocation ARCH5, Strategic and Development Management Policies (2023) Policy H3 and H5, and London Plan Policy H15

9.57 The proposal is therefore incompatible with the fundamental land use requirements for new development at the site and this weighs significantly against the proposal in the planning balance.

Financial Viability

9.58 A Financial Viability Appraisal (FVA), produced by Savills, was submitted with the planning application. The FVA sets out the assumptions that underpin the affordable housing offer and quantum of student accommodation provided in the proposal. The FVA has also been shared with the GLA's Viability Team.

9.59 The Council's appointed and independent assessor (BPS) to undertake a review of the submitted FVA and this has identified fundamental disagreement on a number of critical points. This includes a significant difference with regard to the deficit of the proposal and fundamentally whether the scheme generates a deficit or a surplus. The applicant sets out that the proposed scheme results in a deficit of -£22.7m, even when grant funding has been assumed. This is based on comparing their adopted benchmark land value of £12m with the negative residual land value shown by their appraisal of -£10.27m.

9.60 Although some FVA inputs have been agreed with Savills, including private sales and commercial values, fees, profit and construction timescales, the following inputs in the applicants FVA have not been agreed:

- Social Rent Values (£2.3m difference)
- Intermediate Values (£4m difference)
- Student Accommodation GDV (£17m difference)
- BLV (£9m difference)
- Finance (7%)

9.61 The table below, extracted from BPS's review of the FVA, sets out a summary of the review findings and highlights the areas where there are agreement and disagreement between the Council and the applicant.

Input	Savills	BPS	Comments
Income			
Open Market Sales	£92,965,000 (£10,311psm/£958psf)	£92,965,000 (£10,311psm/£958psf)	Agreed
Social Rent	£10,000,000 (£2,260psm/£210psf)	£12,335,743 (£2,357psm/£219psf)	Disagreed
Intermediate	£5,000,000 (£2,712psm/£252psf)	£9,514,088 (£4,822psm/£448psf)	Disagreed
Student	£76,710,000 (£15,521/£1,442psf)	£93,000,000 (£18,859psm/1,752psf)	Disagreed
Commercial	£612,579 (£6,770/£629psf)	£612,579 (£6,770/£629psf)	Agreed
Expenditure			
Benchmark Land Value	£12,000,000	£3,050,000	Disagreed
Build Costs	£114,196,000	£114,196,000	Agreed
Contingency	10%	5%	Disagreed
Professional Fees	12%	12%	Agreed
GLA Grant	£6,990,000	£6,990,000	Ambiguous - We require evidence of this
Student Contribution	£1,841,040	£1,841,040	Ambiguous - We require Council's clarification on this input
Student Disposal Fees	1.20%	1.20%	Agreed
Affordable Disposal Fee	1.45%	1.45%	Agreed
Commercial Disposal Fees	1,80%	1,80%	Agreed
Private Resi Disposal Fees	1.25%	1.25%	Agreed
Marketing Fee	1.50%	1.50%	Agreed
Letting Agent Fee	10%	10%	Agreed
Letting Legal Fee	5%	5%	Agreed
S106	£210,001	£210,001	Ambiguous - We require confirmation from the Council on this input.
CIL	£12,705,606	£12,705,606	Ambiguous - We require confirmation from the Council on this input.
Finance	8.5%	7%	Disagreed
Profit: OMS	 20%	 20.00%	Agreed
Affordable Commercial Student	6% 15% 15%	6% 15% 15%	
Development Timeframes			
Pre-construction Period	9-months	9-months	Agreed
Construction Period	30-months	30-months	Agreed
Pre-Sales	40%	45%	Disagreed
Sales Period	15-months	8-month	Disagreed
Viability Position (inc. student bursary)	-£22.7m	+£17.3m	Disagreed – We have identified a surplus which we suggest could be provided as a payment in lieu.
Viability Position (100% Open market)	-£24.28	+£15m	

Figure 48: FVA review summary table produced by BPS

9.62 The most fundamental areas of disagreement are in relation to the applicant's approach to Benchmark Land Value (BLV) and their assumptions about the Student Accommodation and other factors. These points are discussed in more detail below.

Benchmark Land Value (BLV)

The Viability NPPG is clear that BLV should be based on Existing Use Value (BLV). Paragraph 013 of the Viability NPPG states that:

"Existing use value should be informed by market evidence of current uses, costs and values. Market evidence can also be used as a cross-check of benchmark land value but should not be used in place of benchmark land value."

9.63 Paragraph 014 of the Viability NPPG states that:

"Existing use value (EUV) is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value."

9.64 A Benchmark Land Value (BLV) of £12m has been used by Savills for the site. However, this figure is based on an Alternative Use Value (AUV) of a former D1 use of the site, which has been replaced by Class F1 and Class E in the latest Use Classes Order. Savills have provided a number of education and school related rental transactions in the report to support their assessment. This indicates a Residual Land Value of £3.05m. However, Savills has gone on to identify additional land sales transaction evidence. This evidence indicates that higher prices have been achieved. Savills have therefore adopted a value of £12m in their appraisal. In effect Savills adopt land sales evidence in preference to the AUV assessment.

9.65 When assessing the Benchmark Land Value, Existing Use Value+ (EUV+) should be the primary approach, land transaction evidence can only be used to cross check the resulting BLV and should not be the primary determinant of BLV. This method applies a 'hope value' to the BLV, which is not a valid approach, and crucially, it is contrary to the clear position detailed in paragraph 15 of the Viability NPPG.

9.66 On this basis, BPS have disagreed with Savills' and encouraged them to resubmit their BLV assessment with another AUV scheme, which may potentially generate a higher value than £3m. Savill's have responded to BPS and at this stage, contrary to the above noted guidance, maintain that the land comparable approach is the most appropriate, and have declined to resubmit the AUV. Rather than engaging meaningfully with BPS and officers on this point, Savills are instead pursuing an approach that is directly in conflict with case law and National and Local Plan policies.

9.67 With the absence of an appropriate BLV assessment, BPS have run an assessment on the basis of the BLV of £3.05m in their assessment, but would reserve the right to review this further should any decision be subject to a review or appeal.

Viability and Student Accommodation

9.68 The other major area of disagreement relates to the approach to the assessment of student accommodation, where the difference between the respective assessments is circa £17m. There are three key areas of concern:

1. Savills have instructed valuation consultants, JLL, to provide an opinion on the value of the student accommodation. However, BPS have only received a summary of the assumptions that have been made. BPS have not received a unit by unit pricing schedule, and this does not allow crucial assumptions such as the premium that could be paid for higher level units to be assessed.
2. The rental levels indicated by JLL differ from those advertised on their respective websites.
3. BPS have applied a yield of 4.5%, which is in accordance with the accepted approach for most London based student accommodation schemes. However, this rate has not been accepted by Savills.

Other Assumptions

9.69 In addition to the above, Officers have identified differences in the social rent and intermediate values, totalling over £6m.

9.70 Savills have also adopted a finance rate of 8.5%, reflecting a total finance cost of £15.7m in the appraisal. It is noted that when the FVA was produced in June 2024 the BoE base rate was 5.25%.

The current BoE base rate (as of February 2025) is 4.5%. As such BPS have applied an appropriate finance rate of 7%. GLA officers are of the opinion that a finance rate of 6.5% would be appropriate.

Summary of Viability Position

9.71 By running an initial assessment on the basis of the £3.05m BLV, the position on student accommodation noted above, and differences in social rent and intermediate values, as well as finance, BPS has identified the potential for a surplus of £17m to be generated. This is a significant difference from the applicants' stated deficit of -£22.7m and does not support the applicant's position that the student accommodation would not weigh against both the provision of priority conventional housing on the site, and the delivery of a policy complaint quantum and tenure of affordable housing, indeed, it would strongly suggest the opposite.

9.72 While it is acknowledged that the BLV position could change should an appropriate AUV be submitted, in the absence of information provided by Savills a significant surplus has been demonstrated by BPS.

9.73 As a result, it would be expected that the following information would be required to be provided to support Savills' position and enable further discussions around the viability of the scheme:

- Alternative BLV Assessment
- Transactional evidence supporting social rent and intermediate values
- Unit by unit pricing schedule of student accommodation and reliable market rental evidence.

Viability Conclusions

9.74 Savills' deficit of -£22.7m is considered to be significantly overstated and an initial surplus of £17m has been identified by BPS. The applicant's approach to establishing the BLV is contrary to the Viability NPPG and a compliant assessment based on an appropriate AUV has been requested. While the BLV position could change should an appropriate AUV be submitted, the Officers consider that the assumed values for the market units and student accommodation are understated, and a surplus is likely to be feasible.

9.75 At this stage, the applicant's FVA has not demonstrated the proposal is deliverable. Despite requests, the applicant has not provided sufficient information through the FVA to demonstrate that the scheme is providing the maximum viable amount of affordable housing. In addition, the applicant has failed to demonstrate through the FVA that the proposed quantum of student accommodation would not weigh against both the provision of on site priority conventional housing or that it would ensure the development could achieve a quantum and tenure of affordable housing which is fully policy compliant.

9.76 Overall, the detailed FVA review analysis further supports the conclusions set out in the Land Use section above.

DESIGN, CONSERVATION AND HERITAGE

9.77 Paragraph 131 of the NPPF 2024 highlights that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

9.78 NPPF Paragraph 137 states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot. Paragraph 138 goes on further to state that in assessing application, local planning authorities should make use of appropriate of a range of tools and processes for assessing and improving the design of development, including workshops to engage the local community, design advice and review arrangements.

9.79 NPPF Paragraph 139 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely significant weight should be given to development which reflects local design policies

and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

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

9.81 In determining applications, NPPF Paragraph 210 states that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

9.82 Planning policies relevant to design are set out in chapter 3 of the London Plan (2021), and policies PLAN1, DH1, DH2 and DH3 of Islington's Local Plan - Strategic and Development Management Policies (2023).

9.83 The London Plan Policy D3 (Optimising site capacity through the design-led approach) states that developments should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

9.84 London Plan Policy D4 (Delivering good design) expects the design of development proposals to be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process.

9.85 London Plan Policy D9 sets out that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. The policy then sets out that development proposals should address impacts relating to visual, functional, environmental and cumulative.

9.86 London Plan Policy HC1 (Heritage conservation and growth) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

9.87 Local Plan Policy PLAN1: Site appraisal, design principles and process requires all forms of development to be of a high quality and make a positive contribution to local character, legibility and distinctiveness, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. Furthermore, to ensure the vision and objectives of the Local Plan are realised, all development must comply with the four key design principles. Key elements of PLAN1 part B, relative to design are indicated below:

- Part (i) Contextual requires all development to make efficient use of sites/buildings, by responding to and enhancing the existing site context (which could extend beyond the site itself); not undermining the quality of existing development and streetscape; and ensuring that the development capacity of site is fully realised.

- Part (ii) Connected – development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings. All opportunities to repair fragmented urban form should be taken.

- Part (iii) Inclusive – development must be adaptable, functional and resilient, and able to respond to the spatial, social and economic needs of the borough's increasingly diverse communities and their different and evolving demands. This includes sustaining and reinforcing a variety and mix of uses in line with any relevant land use priorities of the Local Plan.

- Part (iv) Sustainable – development must be durable and adaptable, and contribute to the creation of a vibrant, liveable, enduring city. All development must consider social, environmental and economic elements jointly and simultaneously, guiding development towards sustainable solutions.

9.88 Local Plan Policy DH1 promotes the best use of innovative design to optimise capacity and stresses the importance of diverse design, where heritage assets are conserved or enhanced. Site potential for development should be optimised. The policy makes it clear that the relationship between the height of buildings and the street/space they flank is of critical importance and the roofline is an important factor contributing to the rhythm and uniformity of a street.

9.89 Local Plan Policy DH1 Part G states that tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale, massing and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.

9.90 Local Plan Policy DH2 requires development proposals to demonstrate a clear understanding of the significance of heritage assets affected by schemes, and the impact on significance. Proposals that harm the setting of a listed building must provide clear and convincing justification for the harm.

9.91 Local Plan Policy DH3 Building heights sets out under part A that tall buildings, defined as more than 30 metres, then under part B, are only acceptable in-principle on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more. Part E of the policy requires all proposals to meet a range of visual, functional and environmental impact criteria similar to those set out in London Plan policy D9.

Heritage

Historic England Statutory Listing Application

9.92 It is important to note that at the time of writing this report Historic England is undertaking an assessment of the site before preparing a recommendation as to whether some or all of the existing buildings at the site should be statutorily listed. Following the completion of their assessment, it is understood that Historic England will prepare a recommendation that will be submitted to the Department for Digital, Culture, Media & Sport (DCMS) for a formal determination to be made. It is understood this recommendation has not yet been submitted to DCMS.

9.93 While the assessment of the buildings at the site, or part thereof, by Historic England and DCMS for potential listing is a material consideration, the assessment undertaken as part of this planning application has been made on the basis of the current relevant designations.

9.94 Following the determination of the planning application currently being assessed here, should all or part of the buildings at the site be subject to a statutory listing, the Local Planning Authority would reserve the right to assess any subsequent planning appeal proposal or further planning application proposal at the site in the context of the relevant designation(s) in place at that time. Were all or part of the buildings at the site to be statutorily listed, all requisite assessments and supporting documentation/plans would need to be submitted to ensure a comprehensive assessment could be undertaken by the Local Planning Authority and/or relevant determining body. An application for Listed Building Consent would also be required to be submitted and assessed.

Heritage: Statutory Tests and the NPPF

9.95 Section 70(2) of the Town and Country Planning Act 1990 states that in dealing with a planning application 'the authority shall have regard to the provisions of the development plan, so far as material to the application… and to any other material consideration.'

9.96 There are the following additional requirements when considering planning applications which affect the setting of a listed building or the character and appearance of a conservation area. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

9.97 Section 72(1) of the Act states: 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in

subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

9.98 The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.

9.99 The NPPF addresses the determination of planning applications affecting designated and non-designated heritage assets at paragraphs 212-220 which state, inter alia, that:

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

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

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

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional

214. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

217. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

218. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to

enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

220. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."

9.100 Heritage **Policy Context**

9.101 London Plan Policy HC1 Heritage conservation and growth, Part C, sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Part C goes on to state that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

9.102 Local Plan Policy DH1 Part E states that the Council will conserve or enhance Islington's heritage assets – both designated and non-designated – and their settings in a manner appropriate to their significance, including listed buildings, conservation areas and locally listed buildings. Paragraph 8.4 of the supporting text notes that heritage assets play a key role in enriching the fabric of the borough's townscape, and new development must seek to enhance them through high quality urban design and architecture which also creates safer and more inclusive places.

9.103 Local Plan Policy DH2 Heritage assets, Part B, relates to conservation areas and states that development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve or enhance the significance of the area, and must be of a high quality contextual design. Proposals that harm the significance of a conservation area must provide clear and convincing justification for the harm; where proposals will cause substantial harm to the significance of a conservation area, they will be strongly resisted.

9.104 Local Plan Policy DH2 Heritage assets, Part I, states that the Council will encourage the retention, repair and re-use of non-designated heritage assets and that proposals that unjustifiably harm the significance of a non-designated heritage asset or their setting will generally not be permitted.

9.105 Local Plan Policy DH3 Part E (iii) states that tall buildings must conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance.

Assessment of Significance

9.106 The Archway Campus site was designated as the Holborn Infirmary Conservation Area (CA41) in September 2013 and the Holborn Infirmary Conservation Area (CA41) Conservation Area Statement was published in March 2014. The Conservation Area boundary corresponds to the boundary wall of the site and includes the pavement surrounding the site on Highgate Hill, Archway Road and Tollhouse Way. The conservation area is included on Historic England's Heritage at Risk Register with its condition assessed as 'very bad' and its vulnerability as 'high'.

9.107 The historic infirmary buildings are included on Islington's register of locally listed buildings in recognition of their significance as important non-designated heritage assets. The Council uses a ranking convention for their locally listed buildings, grading them either A, B, or C: the Archway Campus is designated at Grade A, which is considered of highest quality.

9.108 The first Infirmary buildings on the site were built between 1875-1885 as a workhouse infirmary of the Holborn and Finsbury Union. The site is on a hill and slopes down considerably from north to south. On the western and southern sides, the site is higher than the surrounding public realm, with the boundary walls seemingly operating as retaining walls. It is situated on a triangular site framed by roads to east, west and south and by mainly Victorian development to the north.

9.109 The Holborn Union Infirmary (CA41) Conservation Area Statement (CAS) states that the site also includes important areas of open and green space, notably to the east and west of the site. The area to the west of Main Range was landscaped and laid out as a garden ground, with one area for male and another for female patients. It is thought this survived until at least the 1950s, after which

buildings were built and much of it is now surfaced to provide car parking. The 1970s Furnival building also encroached on some of the recreation ground, but a sense of openness to the west of main range has not been eradicated. With regards to the landscape and open space, Paragraph 62 of the CAS states that:

> *"The area is distinguished by the spaces existing between the buildings, which in turn enable the buildings themselves to be fully appreciated. The open space, including the car park, to the west of the site were originally part of a landscaped garden and therefore the remaining open space is important. There is another important open space fronting Archway Road, which was originally a*
>
> *formal courtyard and is now used as car parking. The open space between the two extensions to the south wing is also important. The open spaces within the conservation area make an important positive contribution to its significance, character and appearance."*

9.110 The site was surrounded by a brick boundary wall with defined entrance and exit points marked by gates and it continues to be bounded with this firm edge to the public realm. The wall is surmounted by railings between brick pillars with stone cappings. When the site was reshaped at the south by the construction of the 1970s traffic gyratory and pedestrian underpass, some of the boundary was replaced with concrete and the new southern end was reformed in matching format to the historic condition.

9.111 Paragraph 71 of the CAS states that:

> *"The Holborn Union Infirmary is of high architectural significance as a fine example of a substantial Gothic revival workhouse infirmary designed by the notable Victorian architect Henry Saxon Snell".*

9.112 Paragraph 69 of the CAS states that the size and location of the original infirmary building results in it being an important local landmark. Paragraph 76 of the CAS states that it has high historic significance as a largely intact Victorian workhouse infirmary building following the Nightingale Ward plan. The CAS accords very high significance to Main Range, north wing (Charterhouse) and south wing (Clerkenwell), high significance to the workshops and laundry and high significance to the boundary treatment and to the open space, gardens and trees. Following it in terms of the Heritage Values, Paragraph 96 states that it accords high evidential value, important historic value, a great deal of aesthetic value and substantial communal value.

9.113 The surroundings in which the conservation area and its buildings are experienced are a park to the east of the site plus housing development; to the south, Navigator Square and buildings within St John's Conservation Area; the Archway Tower (Vantage Point) and surrounding large buildings to the west (where the Local Plan has allocations for 3 tall buildings (Hill House up to 52m, Vorley Road 40-46m and southern end MacDonald Road up to 37m). To the north the land rises past roads of terraced houses within Islington, passing grade II* St Joseph's, a local landmark in the Local Plan, within the Highgate Hill/Horney Lane conservation area, Waterlow Park a registered historic park and garden at grade II* with its listed buildings/structures, and further listed and historic buildings up to Highgate Village, with its conservation area and listed buildings. Highgate West and East Cemeteries, both registered historic parks and gardens at grade I and their listed buildings/tombs are to the south and west of Waterlow Park. There are long views down Highgate Hill, back towards the site and from there across London towards the ridges in south London. From the Archway Road and Archway Bridge there are Local Plan designated views towards and focussed on St Paul's Cathedral.

9.114 Despite the presence of Vantage Point (the Archway Tower), the Main Range of the Infirmary remains a landmark in the townscape with its tower and imposing height. With its firm boundary treatment and public roads abutting its boundaries to west, south and east, it is a defined site and presence and has a spaciousness to its setting enhanced by the tree cover within the boundaries of the site, particularly on the west boundary edge.

9.115 The conservation area, its historic buildings, openness to east and west behind an enclosing boundary have heritage significance from its history, illustrative of the formalisation and increasing professionalisation of medical care for the poor and the role of the nurse, from its architectural conception and design, the work of a well-known architect in this field, Henry Saxon-Snell, from its setting, remaining historic fabric and layout, and from its communal heritage value with its former close association with the Whittington Hospital and healthcare in the north of the borough.

9.116 In line with the relevant statutory tests the Local Planning Authority must give great weight to the conservation of the designated heritage asset. There should be clear and convincing justification for any harm or loss to significance and public benefit would need to outweigh any harm to significance.

Demolition

9.117 With regard to demolition, Paragraph 121 of the CAS states that the council will require the retention of all buildings, which make a positive contribution to the significance of the conservation area and that the appropriate repair and re-use of such buildings will be encouraged.

9.118 CAS Paragraph 122 states that: *"The significance of a conservation area can be substantially harmed over time by the cumulative impact arising from the demolition of buildings, which may individually make a limited positive contribution to its character and appearance. Consequently, the loss of a building, which makes a positive contribution to the character and appearance of a conservation area will constitute substantial harm to the significance of the conservation area."*

9.119 Paragraph 126 of the CAS sets out that the council will encourage the removal of intrusive or poor quality twentieth century alterations and extensions where such proposals conserve and enhance the significance of the conservation area.

9.120 The proposed development involves the demolition of buildings and structures within the Holborn Union Infirmary Conservation Area. The demolition of the Post War buildings, including Furnival building, Ely building, the prefabricated building near Highgate Hill would achieve a reinstatement of the historic character of the site and buildings. Other elements of demolition that would be considered acceptable are the various extensions to the historic buildings that are identified in the CAS as suitable for removal, including the corrugated extension to north side of Clerkenwell building, the modern entrance extension to the Main Range Highgate Hill entrance. As such these proposed elements of demolition would be supported in reinstating the historic form of the buildings and site, representing heritage benefits.

9.121 The application proposes the removal of the former sun terraces on the south side of Charterhouse building. It is acknowledged that the sun terraces were later altered and have been enclosed and modified and such that no objection would be raised to their loss in the context of an acceptable scheme.

9.122 The application proposes the demolition of the end pavilions at either end of the Main Range. The two outermost sections of the pavilions are modern, and there would be no objection to their loss. The two inner pavilions survive to different extents, but the top levels facing Highgate Hill survive and there is better survival on the Archway Road frontage of the southern inner pavilion and both would be removed. It is acknowledged that the Main Range end pavilions have been damaged with extensions and alterations and so the Heritage Officer has advised no objection would be raised to their loss in the context of an acceptable scheme.

9.123 However, the proposed demolition, as set out in the table below is considered to result in damage to the character, appearance and understanding of the site and conservation area and harm the architectural design and remaining historic appearance of the buildings.

Building to be demolished	**Significance**
The Nurses Wing	A non-designated heritage asset that makes a positive contribution to the character or appearance of the conservation area. This building represents an early example of the provision of purpose-built on-site nurses' accommodation at a hospital and was started pre-1900 and is also likely to be by Saxon Snell. The increasing professionalism of the occupation of a nurse is physically represented in this building as an example of provision of staff facilities. Internally it has a cellular plan form with rooms accessed off a corridor, retains some original ceilings and cornices (often in poor condition) above later dropped ceilings, skirtings, a fire surround, some architraves and windows and a wooden staircase. Although it was added to, and is of a more residential scale, it has retained a robust architectural form that corresponds to the architecture of the site's first hospital buildings.
The Staples building	A locally listed building. This is the remaining building of the original service and reception yard's buildings, where there were ancillary uses for the

	hospital such as the laundry. The interior has largely been altered and has modern fabric.
The Link building	A lower ground floor level corridor link between Main Range and Charterhouse Building which is the last remaining of the links between the Main Range and both Charterhouse and Clerkenwell buildings.

9.124 Other proposed changes and removals set out below are considered to result in damage to the character, appearance and understanding of the site and conservation area and harm the architectural design and remaining historic appearance of the buildings.

Removal of interiors

9.125 This includes the removal of the interiors of the Main Range, Admin Building, Charterhouse and Clerkenwell with the external walls retained, in essence making the proposals a façade retention scheme. Although the submitted demolition drawings are not showing that the roofs of the buildings are to be demolished, this appears to be contradicted by the Structural Commentary document produced by SBK. The annotations on the section drawings within this document after 5.19 indicate that it is likely that the roofs will be "re-provided" once the necessary structural investigation work has been done. One section drawing in the structural document does show the roof in red (demolition). In the same document, (paragraph 6.05), it refers to investigative work at Admin being done after a soft strip. This would suggest that not all of the investigative work has yet been undertaken and that the same technique as for Holborn Union may need to apply to Admin building. There is less information in SBK's document about Charterhouse and Clerkenwell and so this would again suggest both that the full investigative work is yet to be undertaken and also that the proposals are likely to amount to facade retention schemes in which the roofs are "re-provided". A method statement for façade retention in Holborn Union has been provided.

9.126 In the main entrance of the Admin building there is a historic staircase with charming ironwork balustrade. The northern end of Admin retains its rooms with fire surrounds and grates in most and the corridor internal windows, historic doors (albeit altered) and some other historic joinery. The southern end of Admin has been more altered, but the final room has an historic character and some fabric, and the southern end retains the historic timber staircase and balustrade which was likely to be part of the Doctor's house. The interior of Main Range also has an interesting double style of staircase as it presumably shows the male and female separation of the building and there are cast iron columns and 'haunches' /spandrels of cast iron between columns and ceiling exposed at ground floor and still visible on the first and second floors of a different design and sometimes boxed in. Charterhouse retains some historic character (although the top floors of the historic buildings were not accessible for Health & Safety reasons). Clerkenwell's interior is more altered through modern fit out and dropped ceilings.

9.127 It is considered that the proposed stripping out of the floors and interiors of the historic buildings and producing a façade retention scheme loses the historic relationship of floor levels and fenestration and represents a loss of the integrity of the buildings.

Removal of parts of the site boundary

9.128 Paragraph 152 of the CAS States that: "The council will require the retention of the original boundary walls and railings. The council will encourage the removal of sections of poor quality twentieth century boundary treatments and replacement with new boundary treatment, which replicates the original boundary walls and railings."

9.129 The application proposes the removal of the boundary form of enclosure at the west and southern parts of the site, where there is the modern concrete and the reformed brick and railings south element, resulting in the site being open to the public realm without enclosure.

9.130 The Conservation Area's character and significance relates partly to enclosure. The Local Plan Site Allocation ARCH5 states that: "Development proposals should contribute to an improved public realm and provide linkages to Archway Town Centre" and that "There are significant level changes across the site which should be factored into the design of the scheme". However, it is not prescriptive in how this should be achieved. The removal of the boundary at south-west and south,

making the site open and graded linearly by reference to the southern pavement level, alters the way the buildings sit in the landscape and how the conservation area relates to the context.

9.131 This would not be the only response which both redevelops the site in an inclusive way with linkages to Archway town centre. A high significance is accorded to the boundary in the CAS and its loss at the south-western side and across the southern side is considered to be harmful to character

Changes to the site levels

9.132 The application proposes the lowering of the levels within the site to achieve a 1:21 slope across the site and a datum with the pavement on Tollhouse Way. The site would be dropped significantly at the north west with approximately 1.9m of excavation just south of the site access. The long section provided on p.33 of the Landscape Statement shows the extent of excavation along the west side of Main Range with substantial drops on the northern part. Currently, the site is above pavement level at its southern and west ends. The landscape masterplan on p.17 suggests a 60cm excavation, whereas p.33 suggests it would be almost a metre of regrading at the south. Nonetheless, there is considerable lowering and regrading proposed, thereby redefining the relationship of the historic buildings with the land around them and how they are 'set'. This would require an element of 'underbuilding' to Clerkenwell and to Charterhouse. These are considered to be adverse impacts on the setting of the heritage assets.

Modifications to the historic buildings

9.133 The proposed lowering of the site levels, particularly around the base of the historic buildings, would result in the below ground elements of the buildings becoming more exposed, and consequently additional building depth would be required.

9.134 At the Charterhouse building, it is proposed that the ground floor residential accommodation would be below the current ground floor level of the site. There would be a similar situation with the student accommodation at the Clerkenwell building and to some of the lower parts of the Main Range. For the Admin building, the north end would be lowered and residential accommodation formed from an 'understorey' to provide the entrance level of the proposed houses at the north end of the range.

9.135 The elevations of the historic buildings would also be altered, including the south side of the Clerkenwell building, the south side of the Charterhouse building, and the east side of the northern end of the Admin building. The re-fenestration of the historic buildings, which is intended to recreate and reflect the historic fenestration pattern, is considered to be beneficial, subject to further details.

9.136 It is proposed that roof lights would be installed to the roofs of the historic buildings to serve the proposed living accommodation in the upper levels. Whilst this measure would be regrettable, it would be a lower end of the adverse impact.

9.137 The "stretching" of the buildings and the reorganisation of the elevations would represent a further phase in the life of the buildings. Whilst the extent of lowering of the ground levels of the site is considered to be regrettable, the elevation reorganisation could be accommodated, provided that the structural commentary can confirm that the lower exposure and 'underbuilding' can be undertaken in conjunction with a façade retention scheme. However, it is noted that at this stage the applicant has not provided sufficient information to demonstrate this.

9.138 The floor to ceiling heights and position of floor plates of the historic buildings is expressed in the elevation arrangement. The proposed scheme is a façade retention scheme with new differing floor plates with the running of new mezzanine floor plates close to the large windows on the Highgate Hill elevation which would be damaging to visual appearance. The removal of the interiors and realigning of the floor plates would entail a regrettable loss of this historic expression and material.

9.139 New buildings within the Conservation Area

9.140 Following the demolition of the Staples building, Furnival building, Ely building and the prefabricated building, three new residential buildings, Block A (7 storeys plus rooftop plant room), Block B and Block C (both 6 storeys plus rooftop plant room), would be constructed on the Highgate Hill side of the conservation area/site. A tall building for student accommodation and a separate student amenity building would be built on the southern apex replacing the demolished Nurses' accommodation building and the 1980s Clerkenwell extension.

Blocks A, B and C

9.141 The heights of Blocks A, B and C have largely been designed to sit below the level of Main Range's roofs, however the 'Proposed North & South Long Elevation' drawing (AC-GRID-ZZ-ZZ-DR-A-PL0015 Rev P1) demonstrates the taller relative height of Block A alongside the Main Range. In addition, the 'Block B Proposed Long Section B0 (East-West)' drawing (AC-NMLA-BB-B0-DR-A-PL200) shows that the roof level plant of Block B would be taller than eaves height of the Main Range.



Figure 49: 'Proposed North & South Long Elevation' drawing (AC-GRID-ZZ-ZZ-DR-A-PL0015 Rev P1) demonstrates the taller relative height of Block A (right) alongside Main Range (left).

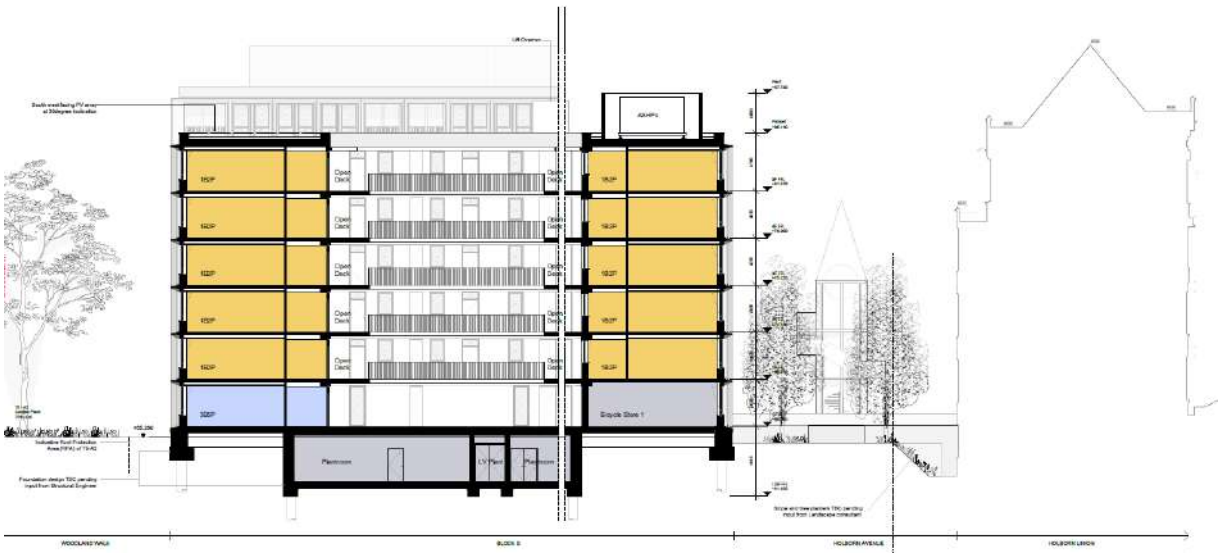


Figure 50: 'Block B Proposed Long Section B0 (East-West)' drawing (AC-NMLA-BB-B0-DR-A-PL200) shows that the roof level plant of Block B (left) would be taller than eaves height of the Main Range (right).

9.142 A landscaped garden with play space would be provided in the area between Blocks B and C, with the garden positioned to provide an axial view from Highgate Hill between the blocks to the centre piece of Main Range.

9.143 Block C would occupy a large part of the remaining mainly open ground of the former west side garden grounds. The CAS recommends the restoration of the openness of the western side of the site which Block C would contravene, although it is noted that the scheme provides an area of garden space between Blocks B and C.

9.144 Given the sloping nature of the site, the northern part of Block C would sit on a tall blank brick plinth approximately 3 metres in height at its southern end with the southern-most part of Block C being a double height expression of approximately 6.7m. This would introduce an imposing blank elevation plinth that would risk overwhelming the residential nature of the site and the amenity area despite a higher level for the tree area. The architecture itself risks being insufficiently subservient in the setting of the Locally Listed Main Range. The north elevation Block C and the south elevation of Block B

facing the Heritage Garden are again set on plinths which would form the side enclosures to the garden, again risking domination. Whilst it is recognised that the residential units facing the garden need privacy, the plinth device risks being too imposing.

9.145 As such there are concerns that the new architecture is not sufficiently subservient and this is expressed through the proposed tall plinths to the Highgate Hill side of Block C, and tall plinths either side of the heritage garden. In addition, there are concerns, highlighted by the Metropolitan Police Design Out Crime Officer, that the blank masonry facades, including those at Block B and C, could attract graffiti and vandalism.

9.146 In terms of materials, the applicant's Structural Statement states that the brickwork would comprise brick slips to accommodate loading and foundation issues. It is considered that the architecture, although of a thoughtful quality, would have an imposing element through the bay repetition and fairly rigorous consistency of the brick appearance and the height of some of the plinths. In the event of an approval, conditions and a relevant clauses in the legal agreement would be needed to secure the required level of architectural design quality, finish and materials.

Student Amenity Building

9.147 The student amenity building – a new three storey building (with double height first floor) located to the west of the new tower, providing a ground floor lobby; first floor amenity space and basement level cycle parking - would be approximately 10 metres tall above ground. This could result in an imposing presence. The upper floor would be used as amenity space, but the ground floor architectural treatment would express the service nature of the space that houses plant. There would be blank masonry at ground floor storeys to Archway Road and Tollhouse Way. On the west side facing into the amenity square and the north elevation facing Clerkenwell, the ground floor elevations would be composed of metal louvres, metal framed access doors, a concrete faced door and blank masonry walls. While the building's service expression is considered to have a visually unsatisfactory impact on the square and its amenity value, it is noted that the student amenity building completes the street edge onto the Archway Road, terminating the site as it meets the busy gyratory. As such, and notwithstanding its imposing presence, it is considered to successfully screen the new public plaza from the Archway Road traffic to the east.

9.148 There are however concerns, as identified above, that the new architecture is not sufficiently subservient and the ground level eastern elevation of the student amenity building facing the pedestrian realm on Archway Road would be dominating and overbearing.

9.149 In addition, there are concerns, highlighted by both the Heritage Officer and the Metropolitan Police Design Out Crime Officer, that the blank masonry facades to the west and south could attract graffiti and vandalism. Overall, given its proposed height and massing, it is considered that the proposed student amenity building would have an adverse impact on the setting of the heritage buildings and the character and appearance of the conservation area.

Tall Building

9.150 A tall building comprising 24 floors/ 27 storeys/ 82m in height is proposed at the southern apex of the site. The site is not allocated in the Local Plan for a tall building (defined as over 30m in height).

9.151 In its guidance, Tall Buildings HEAN 4 1.3, Historic England includes the following Principles for tall buildings: A plan-led approach to tall buildings to determine their location; an evidence base which explores alternative options for the location and heights of tall buildings; decision making informed by understanding of place, character and historic significance; tall buildings proposals which take account of local context and historic character; and early and effective engagement at plan-making and decision-taking stages including the use of design review panels.

9.152 As the site is not designated for a tall building in the Local Plan, the introduction of a tall building is contrary to the Historic England guidance noted above. Local context and historic character are addressed later.

9.153 London Plan Policy D9 Part C (d) states that proposals for tall buildings should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

9.154 London Plan Policy HC4 Part D states that development proposals in designated views should comply with the following: 1) London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole.

9.155 Local Plan Policy DH2 Part J states that development must protect or enhance the London View Management Framework views and Local Views. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view.

9.156 In terms of assessing the visual impact of a proposed tall building, Local Plan Policy DH3 Part E (ii) states that a proposal should protect or enhance strategic and local views.

London View Management Framework (LVMF) Panorama 1A

9.157 The proposed tall building would be visible in the LVMF Panorama 1A. The LVMF's introduction to the panorama includes:

9.158 *"The viewing terrace at Alexandra Palace, set in 196 acres of parkland on the rising ground of Muswell Hill, provides a panoramic view to the south. A predominantly vegetated ridge running across the view forms a distinction between the middle ground and the background. This distinction is crucial to the quality of the panorama."*

9.159 The LVMF describes the panorama as follows:

"The middle ground rises from the park to a ridge running east west across the panorama. This part of the view has a broadly residential character dominated by red brick terrace houses, pitched roofs and mature vegetation interspersed by church spires and public buildings. The wide background of the panorama includes a number of focal points. These include a cluster of taller buildings in the City of London, incorporating St Paul's Cathedral, Euston Tower, BT Tower, Centre Point and the Shard. From some positions, a second cluster of tall buildings at the Docklands is visible, beyond an open middle ground. The peristyle, dome and lantern of St Paul's Cathedral are particularly visible from the eastern entry to the terrace, owing to a dip in the east west ridgeline."

9.160 The Visual Management Guidelines state:

9.161 *"New tall buildings in the panorama should consolidate and improve the composition of the existing clusters of towers and preserve the distinction between the lower density residential character of the middle ground and the higher density character of central London in the background."*

9.162 It continues:

"Development that breaches the vegetated ridgeline should not compromise the distinction between the middle ground and background. All development should make a positive contribution to the existing characteristics of the view."

9.163 In their consultation response, Historic England note that these panoramic views are sensitive to large scale development in the medium and foreground of views towards St Paul's and the Palace of Westminster. The tower would impact the distinction between natural and urban silhouettes in these views, muddying the clear distinction between the lower heath and Highgate Hill, and the larger urban cluster and historic skyline of central London.

9.164 The proposed tower would breach the ridgeline in the Panorama and would be visible in the view rising up above the ridge. It would not appear to be part of either of the clusters of tall buildings described in the LVMF. However, it would mainly appear where there are modern and relatively bulky blocks of flats that are on the northern side of the ridge. Its height would lead to it being in breach of the guidance relating to the ridgeline, but its position and context lessens the impact it might otherwise have. While in heritage terms the impact on this view would be at a lower level of harm, the proposed tower's breach of the Panorama ridgeline would not protect or enhance the view in accordance with the criteria set out in Local Plan Policy DH2 Part J and Policy DH3 Part E (ii).

Local Views LV4 and LV5

9.165 Designated Local Views LV4 and LV5 pass through part of the site. Local view LV4 from Archway Road to St Paul's Cathedral clips the southern part of the eastern boundary of the site with Archway Road. Local view LV5 from Archway Bridge to St Paul's Cathedral covers a broad strip through the eastern part of the site, including the eastern sections of the Charterhouse and Clerkenwell and Nurses wing buildings and the Main Range administration block.

	
Local view LV4 from Archway Road to St Paul's Cathedral	Local view LV5 from Archway Bridge to St Paul's Cathedral

9.166 No modelling of view LV4 has been provided by the applicant in the submitted supporting material. Additional view analysis has been requested from the applicant to demonstrate this position but at the time of writing no further details have been provided. Given this technical information has not been submitted, a detailed assessment of this cannot be undertaken and in the absence of evidence to demonstrate otherwise, it must be considered to not be acceptable.

9.167 The proposed tall building would encroach into the designated view corridor of Local View LV5 from Archway Bridge to St Paul's Cathedral. While no wider than the existing encroachment from the neighbouring Vantage Point building (Archway Tower), the proposed tower would be in front of Vantage Point when viewed from the bridge and considerable height above the neighbouring building would be apparent. Accordingly, the proposed tall building would consolidate the encroachment into Local View LV5.

9.168 Protected views policies are intended to operate over the long term, to preserve and enhance important public views now and for generations to come. Over time the policy aim is for the new development to enhance the view and not to continue to adversely impact on the view. The proposed tower would not achieve this aim given its intrusion into Local View LV5 and its excessive puncturing of the Highgate Ridge as viewed from Alexandra Palace.

9.169 This encroachment into LV5 would be contrary to the aims of Policy DH2 Part J which seeks to protect or enhance local views in addition to the failure to comply with Policy DH3 Part E (ii). This weighs negatively against the scheme in the planning balance.

Historic England Guidance on the Setting of Heritage Buildings

9.170 Historic England advocates a 5 stage assessment of development within the setting of Heritage Assets.

Step 1: identify which heritage assets and their settings are affected

Step 2: assess the degree to which these settings and views make a contribution to the significance of the heritage assets or allow significance to be appreciated.

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: make and document the decision and monitor outcomes

9.171 There is a considerable number of heritage assets that would be in the vicinity of the proposed tall building (and the other new buildings on the site). Most would have their setting, the surroundings in which a heritage asset is experienced, altered in some way due to the visibility of the new development, in particular the tall building. The heritage assets considered to be most adversely affected by the proposed development are set out below:

Holborn Union Infirmary

9.172 First, the Holborn Union Infirmary: its landmark tower and imposing Main Range and buildings, boundary enclosure and greenery contribute to significance by showing the layout of the hospital with greenery and exercise areas for the patients and the dominance of the main hospital building in the site and surroundings. The landmark Main Range tower still dominates the site. The proposed tall building, (and the other new buildings), would crowd the setting of the heritage buildings, eliminate the last vestiges on the west side of the open setting within a boundary. The tall building subverts the hierarchy of the site leaving Main Range inappropriately lessened in importance. It would be harmful to the character and appearance of the conservation area and setting.

Waterlow Park

9.173 Waterlow Park is a registered park and garden at grade II* and the registration entry refers to it being renowned for its views, “it was renowned for its magnificent views. The park is well preserved and still has fine views”. It was referred to as a “garden for the gardenless”. There are few visual incursions into the surroundings of the park when inside the park, although the top of Vantage Point tower can be seen. There is tree cover around the park. The tall building would rise above the trees and be visible as a nearby urban intrusion into the parkland setting to the detriment of the setting of the designated heritage asset. View 24 in the AVR. The ZTV shows other areas of theoretical visibility including nearer Lauderdale House and it would have been good to have had these scoped too. (The registration entry includes: “There are good views from the higher ground southwards towards central London and the City. The boundaries of the park are marked by a mixture of walls and fences”).

Highgate West Cemetery

9.174 No views have been provided from within Highgate West Cemetery (registered park and garden at grade I) but the ZTV shows lesser theoretical visibility and there is considerable tree cover. View 15 from Makepeace Avenue (Holly Lodge Estate Conservation Area) shows that the Tower would be visible above Highgate East Cemetery (registered park and garden at grade I). From the AVR, this seems to be the only visual incursion above the cemetery tree line on this sight line and therefore disrupts the setting of an enclosed sylvan cemetery that is of high heritage value. Two views have been scoped in the East Cemetery, but not on the same sight line as Makepeace Avenue, so that has not been tested. On View 16 at the southern end of the cemetery, the tower would be visible in winter views from the cemetery. It would be at some distance and has an element of tree cover that the view from Makepeace Avenue does not. If there were to be any change to the tree cover the tall building would be more visible and this would be a visual incursion.

St Joseph’s Church

9.175 The church of St Joseph’s on Highgate Hill is a Local Plan landmark (LL1) and it is listed at grade II*. There are views up Holloway Road to St Joseph’s and its dome and its situation on raised ground, together with its imposing architecture, give a prominence and grandeur to the church. It is also viewed from the north on Highgate Hill’s higher ground and in places from within Waterlow Park. This setting is a part of its significance. View 31 in the AVR shows that the position and height of the tall building would create a canyon effect with Vantage Point when St Joseph’s is viewed from Holloway Road, diminishing the prominence of the church and its dome. It would also be affected in views down Highgate Hill where the tall building would be a dominant and eye catching addition to the view (for instance View 13). The tall building would be harmful to the setting and significance of St Joseph’s and fail to comply with Local Plan policy DH2 K which seeks to ensure the prominence and setting of designated local landmarks.

St John’s Grove Conservation Area

9.176 The St John’s Grove Conservation Area is on the Historic England Heritage at Risk register. It borders the site to the south and contains the historic buildings on Navigator Square and residential areas to the south. The pub on Navigator Square is a prominent building in the townscape, is locally listed, and the tower of Main Range and some of the infirmary buildings can be seen above and to the side of it. The setting of the conservation area is varied and fractured in places (for instance with

Archway island's tall buildings) but the pub still holds a townscape place. However, the tall building would rise immediately behind the pub lessening its dominance and setting (View 2). In terms of the HE guidance, substantially reducing the height of the tall building would be an improvement for minimising harm.

Landscaping

9.177 The proposed eastern boundary treatments would result in the removal of the original central pavilion entry point gate on the Archway Road frontage, which is marked with taller stone cappings, the surviving granite protection blocks at pavement level and iron gates between. It is proposed that the gap between the gate pillars would be infilled with a low brick wall and black railings.

9.178 The northern side of Charterhouse is proposed to be the outdoor mechanical plant area, a space for the large ASHPs that would be used in the heritage buildings. No elevations of this plant have been provided in the submission material, but the details relating to the footprint indicate that the ASHPs and supporting kit are likely to be large in order to cope with the four heritage buildings. This could have an adverse impact on the setting of Charterhouse and have an adverse impact on the character and appearance of the conservation area.

Heritage Conclusion

9.179 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. S66 of the Act says that special regard should be had to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Decision makers should give considerable importance and weight to these statutory requirements. When an authority finds that a proposed development would cause any harm to a listed building or its setting or to the character or appearance of a conservation area, it must give that harm considerable importance and weight in reaching a decision.

9.180 Chapter 16 of the NPPF places emphasis on the desirability of sustaining and enhancing the significance of heritage assets. At paragraph 212 and designated heritage assets, it states that: "great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be) … irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". Any harm to the significance of a designated heritage asset, including from development within its setting, requires "clear and convincing justification" (paragraph 213). Where the harm to significance is 'less than substantial' it should be weighed against the public benefits delivered by the proposed development (paragraph 215). In 219 it says that "local planning authorities should look for opportunities for new development with Conservation Areas…., and within the setting of heritage assets, to enhance or better reveal their significance…….". Local Plan policies DH1 say development must protect or enhance the LVMF views and Local Views and that the council will conserve or enhance Islington's heritage assets and their settings in a manner appropriate to their significance and that development should protect or enhance the settings of Local Landmarks. DH2 has further policies on conservation areas and other heritage assts and views. There is also the council's guidance in the CAS suite of guidance.

9.181 By reason of the demolition of non-designated heritage assets, including the interiors of the retained buildings, the loss of openness of the west side of the site, the scale, height and footprint of the new buildings, including the tall building, which would dominate the conservation area, its buildings and the settings of heritage assets and the impact of the tall building on designated views, the proposed development would cause harm to the significance of the designated heritage assets. In the terms of the NPPF, this would be less than substantial harm. This would be at the higher levels of less than substantial harm and the proposals would be contrary to policy, to statute and guidance.

9.182 In accordance with the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The exercise of weighing public benefits against the higher level of less than substantial harm to significance is set out in the Planning Balance later in the report.

Heritage Benefits

9.183 Within the submitted Planning Statement (Table 11) the applicant has listed what they consider to be the heritage benefits of the proposal. These are listed below together with an assessment as to the weighting of this benefit in heritage terms:

- *Introduction of a long-term use which will reinvigorate a heritage asset which is on the At Risk Register.*

9.184 It is acknowledged that the Holborn Union Infirmary Conservation Area is on Historic England's Heritage at Risk Register and an appropriate long-term viable use of the site could reinvigorate the heritage assets. If this were to be achieved, it would be considered to represent a significant benefit.

9.185 However, the proposals, including but not limited to, the extent of demolition and scale, height and massing of proposed new buildings would amount to less than substantial harm to the heritage assets, including the conservation area. This would be at the higher levels of less than substantial harm and the proposals would be contrary to policy, to statute and guidance. As such, while the principle of the benefit could carry appropriate positive weight, in practice the heritage assessment is clear that the proposal would fail to accord with policy, would result in harm to the heritage asset and would therefore fail to deliver the desired benefit. As such, it is considered that this failure carries significant weight against the proposal in the heritage balance.

- *Removal and appropriate replacement of poor-quality windows and doors.*

- *Removal of poor quality and uncharacteristic 20th century accretions which detract from the significance of the locally listed buildings, and by extension their contribution to the character and appearance of the Conservation Area.*

- *Reinstatement of the original fenestration pattern to the Holborn, Clerkenwell and Charterhouse buildings.*

- *Removal of unsightly servicing accretions including external pipes and wires.*

- *Restoration and reinstatement of historic cast iron rainwater goods.*

- *Reinstatement of the fenestration pattern to the lower floors of the Clerkenwell and Charterhouse buildings within the historic bay arrangement.*

- *Removal of the poor-quality post-war extension to the Clerkenwell Building.*

9.186 The above points are considered together and it is considered that the removal, replacement and reinstatement of various unsympathetic additions, interventions and changes would form a heritage benefit and if undertaken to a suitably high standard commensurate to the design and quality of the heritage buildings, would carry moderate weight in the heritage balance.

- *Retention and restoration of historic fabric of the Holborn, Charterhouse and Clerkenwell buildings.*

9.187 It is noted that the exterior facades of the historic Holborn, Charterhouse and Clerkenwell buildings would be retained and restored. However, any benefit in this regard would carry only limited weight given that the proposals essentially amount to a facade retention scheme. The proposed stripping out of the floors and interiors (and likely roofs) of the historic buildings and producing a façade retention scheme loses the historic relationship of floor levels and fenestration and represents a loss of the integrity of the buildings, causing harm to the heritage assets. As such, this is not considered to be a benefit of the proposal but rather would weight against the proposal in the heritage balance.

- *Retention of the distinctive lift tower and refurbishment with new glazing in the 'blind' windows.*

- *Introduction of new glazing within the existing openings for ventilation in the tower elements of the Holborn, Charterhouse and Clerkenwell buildings.*

9.188 The two above points would amount to alterations to the historic buildings and are not considered to be heritage benefits. The introduction of new glazing and the loss of the ventilation openings in the tower is considered to represent a loss of historic fabric and would detract from the significance of the heritage asset.

- *Introduction of new high quality landscape design that reinvigorates the site and allow visitors to better appreciate its significance.*

9.189 The delivery of a high quality landscape design that reinvigorates the site could be a benefit. Whilst enabling public access into the site to view the retained heritage, the site's historic landscaping, manifested in the openness and space to the west side of the Main Range would be largely removed by the proposal. As such, it is considered that this point is somewhat neutral.

- *Introduction of a new public square that will allow visitors to dwell within the site and appreciate the architectural value of the southern elevation of the Clerkenwell building*

9.190 The creation of the public square involves the removal of the southern boundary and regrading of the site levels amounting to comprehensive changes to the site's context and detracts from significance in heritage terms. As such, this would not represent heritage benefit.

- *Opening the Site to the public for the first time in its history and so improving the ability to appreciate its significance.*

9.191 When the site was part of the Whittington Hospital, it was open to the public and the public would have access into the buildings to visit and for appointments. Notwithstanding this, for the reasons noted above, this is considered to be neutral in heritage terms.

Other Heritage Benefits

9.192 In addition to the points identified by the applicant and addressed above, it is considered that the proposed repair works including re-fenestration, would help to ensure future maintenance of the conservation area and moderate weight is attached to this benefit. The demolition of some of the previous unsympathetic additions to the locally listed buildings would comprise a heritage benefit as would the demolition of the later free-standing buildings on Highgate Hill, such as the Furnival Building. The removal of some of the later hard standing which is used for car parking would also be considered a heritage benefit. Moderate weight is attached to these benefits in the heritage balance.

Conclusions on the Heritage Balance

9.193 The previous sections of this report outline the harm in respect of heritage, comprising the harm to the designated and non-designated heritage assets. Specific reference has also been made to the emphasis on the great weight that should be afforded to a heritage asset's conservation as required by Paragraph 196 of the NPPF, taking into consideration the statutory duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

9.194 Notwithstanding the heritage benefits noted above, by reason of the demolition and alteration of non-designated heritage assets, the loss of openness of the west side of the site, the scale, height and footprint and location of the new buildings which would dominate the conservation area, its buildings and the settings of heritage assets and the impact of the tall building on designated views, the proposed development would cause harm to the significance of the designated heritage assets. In the terms of the NPPF, this would be less than substantial harm, but at the higher levels of less than substantial harm.

9.195 Officers do not consider that the heritage benefits would be sufficient to outweigh this harm in purely heritage terms. An assessment of the public benefits of the proposal is undertaken in the 'Planning Balance section' later in the report.

9.196 With regard to heritage impacts, it is considered that the proposal would fail to preserve or enhance the character and appearance of the Holborn Union Infirmary Conservation Area and would cause harm to the significance of designated heritage assets contrary to paragraph 215 of Chapter 16 (conserving and enhancing the historic environment) of the National Planning Policy Framework 2024, policy DH1: Fostering innovation and conserving and enhancing the historic environment; policy DH2: Heritage Assets; and policy DH3: Building Heights of Islington Local Plan 2023 and guidance contained within Islington's Holborn Union Infirmary Conservation Area Statement and Design Guidelines 2014.

Design Considerations

Contextual Fit

9.197 Islington's Urban Design Guide (UDG) SPD provides guidance with regard to addressing the contextual compatibility of a scheme. Paragraph 4.4 sets out that the success of any development

depends largely on how it relates to and fits within its wider context. Paragraph 4.5 of the UDG states that:

"Context is about more than built form. Factors such as landscape, traffic, activities and land uses – and critically, how these interact with each other – all contribute to the setting of a site or area. The right design solution cannot be achieved without considering all of the disparate elements that contribute to a locality's sense of place, not least of all that in practice context is dynamic, requiring designs to be inherently flexible to enable buildings and places to endure and adapt over the longer term."

9.198 Paragraph 4.7 of the UDG states that:

"In terms of built form, understanding the cumulative effect of an area's architecture is more important than a single building, and Islington's collective streetscape can best be defined as reflecting its continuous evolution over time, composed as it is of buildings of eclectic and diverse architecture and age. The result of this densely built-up nature is that there are no sites within the borough that are so large or so detached from their surroundings that the context can be ignored and an entirely different typology, character or scale introduced."

9.199 Paragraph 4.8 of the UDG sets out that the design of new development must therefore clearly relate and respond to its setting to ensure that the proposed density and uses are suited to the site and its wider context.

9.200 It is noted that the proposal has considered the UDG contextual matters by creating a series of interconnected public spaces. The position of a new public plaza to the site's southern edge, opposite Navigator Square to the south, and the creation of a more permeable southern edge would help to reduce physical and functional severance and further stitch the site into its context. In urban design terms, Highgate Hill would be animated by a street edge created by the three new residential buildings (Blocks A, B and C) providing the pattern of development from north to south. The base of the proposed tower is considered by the Urban Design Officer to create a termination of the hill, signifying a transition to Archway's town centre environs.

9.201 It is important to highlight, however, that some of these well principled urban design structuring devices are contrary to the site-specific design guidance set out in Part 2 of the Holborn Union Infirmary Conservation Area Statement (CAS), including the loss of the open space to the western part of the site that was once the rear communal gardens of the original medical facility.

9.202 CAS Paragraph 119 sets out that the Part 2 of the CAS provides design guidelines for demolition, alterations and extensions to existing buildings, new buildings and other planning issues. It goes on to state that these guidelines have been set out to offer clear guidelines to those proposing works which may impact on the significance of the conservation area and to inform the assessment of planning applications.

9.203 With regards to demolition, Paragraph 121 of the CAS states that the council will require the retention of all buildings, which make a positive contribution to the significance of the conservation area and that the appropriate repair and re-use of such buildings will be encouraged. Through the extent of the proposed on site demolition the proposal would, in part, be contrary to this. As set out in the Heritage section of this report, the demolition of the Nurses Wing, Staples building and Holborn Union Charterhouse link building, to make way for the proposed development would result in the loss of historic buildings that make a positive contribution to the significance of the conservation area.

9.204 CAS Paragraph 143 states that new buildings should be carefully designed to respect the setting of any significant historic buildings by virtue of their scale, proportion, height, massing, alignment and use of materials. It goes on to state at paragraph 144 that new buildings should be carefully located at an adequate distance to any significant historic buildings and be adequately subordinate to their mass and height.

9.205 Again, it is considered that the proposal fails to address this requirement of the CAS. The Heritage section of this report sets out concerns regarding the heights of Blocks A, B and C in comparison to the roof heights of the main range. While it is acknowledged that the heights of the new residential blocks have largely been designed to sit below the level of Main Range's roofs, the 'Proposed North & South Long Elevation' drawing (AC-GRID-ZZ-ZZ-DR-A-PL0015 Rev P1) demonstrates the taller relative height of Block A alongside the Main Range. In addition, the 'Block B Proposed Long Section B0 (East-West)' drawing (AC-NMLA-BB-B0-DR-A-PL200) shows that the roof level plant of Block B

would be taller than eaves height of the Main Range. As a result, it is not considered that these new buildings would be subordinate to their mass and height contrary to the CAS design guidelines.

9.206 The proposed 82m tall building to the south of the site would not respect the setting of the historic buildings, including the Main Range and its landmark spire nor would it be adequately subordinate to the mass and height of the historic buildings, contrary to the CAS guidelines.

9.207 While from a purely urban design perspective the proposal demonstrates some successful attributes in terms of site configuration, the proposal is not considered to align with the site-specific design guidance set out in the CAS. The proposal results in the demolition of historic buildings that make a positive contribution to the significance of the conservation area. In addition, the proposed heights of Blocks A, B and C would not be subordinate to the Main Range and the proposed tall building would not respect the setting of the historic buildings and would not be adequately subordinate to the mass and height of the historic buildings.

9.208 Spatial and Architectural Context

9.209 Islington's Urban Design Guide (UDG) SPD Paragraph 5.19 states that:

"Due to the densely developed nature of the borough and the high quality of much of its built form, the existing context provides strong signals to which new development must respond in order to create a harmonious and coherent urban form. In the majority of cases this will require an approach which follows the established building line. However in areas which suffer from poor layout, the layout of new development should seek to knit the area back together and integrate with the surrounding street frontage."

9.210 The Urban Design Officer has advised that the development's legible layout, strong building lines and permeable edges and built form, is considered to have addressed this part of the guidance.

9.211 UDG Paragraph 5.20 goes on to provide greater specificity advising that all new development should be based on a layout that delivers:

- Permeability.
- Sufficient light and air to penetrate the buildings, surrounding streets and any open space to the rear.
- Privacy to the rear and defensible space at the front.
- Consistent building lines.
- Animation.
- An appropriate height to width relationship between the building frontage and the street.

9.212 The Urban Design Officer has advised that the proposed layout of the scheme, it is considered to have successfully addressed these place making principles.

9.213 UDG Paragraph 5.21 stresses the importance of providing *"genuine open space free from subterranean obstruction that supports or could support larger trees and proper soft landscaping."*

9.214 The Urban Design Officer has advised that the landscaping includes areas of both hard and soft landscaping with multiple new trees and an interconnected series of well landscaped open spaces in accordance with the principles of this design requirement.

9.215 It is however noted that the Urban Design Officer's views are contrary to the harm identified in the heritage assessment as well as the consultation observations received from both the Sustainability Officer and Arboricultural Officer, which are set out in the report. In addition, while elements of the UDG have been successfully incorporated, the proposal is not considered to align with the site-specific design guidance set out in the CAS and other policy requirements and therefore fails to appropriately respond to the site's spatial and architectural context.

Appearance of New Build Elements

<u>Blocks A, B and C</u>

9.216 Due to the topography and a drop in storey heights, the three blocks would step down Highgate Hill.

9.217 Block A would be 7 storeys plus a setback roof plant level (93.8m AOD at tallest point) and would step down along its long elevation to 6 storeys towards the neighbouring residential properties to the north. Blocks B and C would be six storeys plus a setback roof plant level (87.7 and 84.6m AOD at tallest point).

9.218 The Design and Access Statement explains that the design of the three affordable blocks is intended to respond to the historic Infirmary buildings, by adopting an expressed framework of projecting piers and string courses. The DAS sets out that the dominant vertical piers would be made of masonry and the intermediate horizontal transoms would be made of precast concrete, to match the colour of the brickwork. A recessed secondary layer of brickwork would be introduced to surround the windows, similar to the recessed panels beside the windows of the Infirmary buildings.

9.219 The DAS goes on to state that string courses would sit at each floor line as with the Infirmary buildings and that the scale of the main framework is intended to calibrate the new buildings to the scale of the infirmary buildings, allowing the smaller window openings to sit within it.

9.220 The DAS explains that the piers and lintels taper to a fine leading edge in order to match the scale of the equivalent detail on the Infirmary buildings, with the tapered profile designed to maximises daylight penetration while providing a similar sense of recession and layering as on the existing buildings' façades.

9.221 In terms of materials the DAS set south that the façade would comprise a composition of brick and precast concrete. Brick would be used for the dominant vertical piers and precast concrete would be used for the horizontal elements of the façade, such as lintels and solid wall panels. The concrete would be pigmented to match the colour of the brick, to help to produce a visually cohesive façade.

9.222 The DAS sets out that the windows within the façade bays would be PPC metal framed with a small fixed panel and a large opening section above. This arrangement is intended to help ensure views out and daylight in are maximised as well as providing favourable façade proportions.

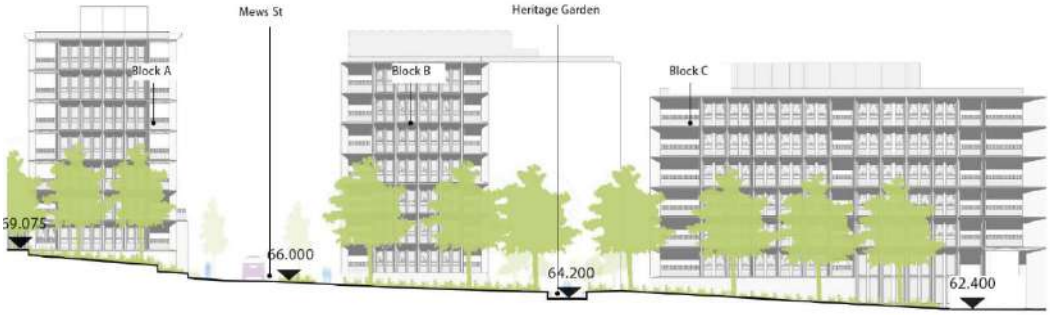


Figure 51: Proposed south-west facing elevations of the affordable housing blocks from Highgate Hill



Figure 52: Visualisation of Block A with corner balconies

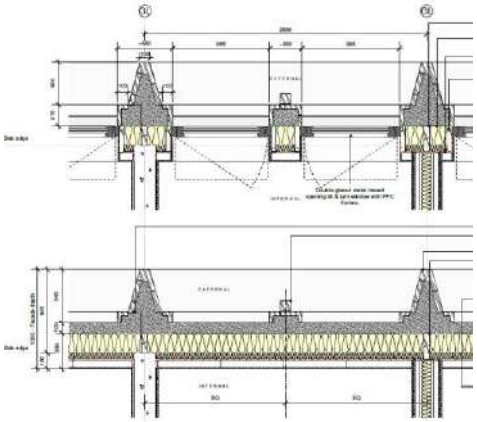


Figure 53: Section and plan details showing top: Typical window bay; and bottom: Typical solid wall bay



Figure 53: Proposed facade principles



Figure 54: Visualisation of Block A double-height, corbelled entrance

9.223 With regards to the appearance of Blocks A, B and C the Urban Design Officer has provided the following observations, with officer comments provided beneath:

"The proposal creates an urban 'street edge' to Highgate Hill with a series of well-designed buildings stepping down the hill, set back from the existing and retained tree line. The buildings are spaced so as to afford good views through to the retained historic buildings together with more immediate views of landscaped courtyards and gardens. The layout will generate a suitably animated edge, providing a strong and rhythmic edge condition to this busy, important street."

"The architecture of the three new buildings to Highgate Hill is considered to be of a suitably high quality. The buildings have been designed with a quiet grandeur that speaks to that of the historic buildings to their rear without overwhelming them. The architectural detailing is rich and rhythmic with deep reveals, bold entrancing, and well proportions fenestration components."

9.224 When taken in isolation, the architecture of the proposed affordable housing blocks is considered to be of a high quality. However, as set out in the heritage assessment, when taken in the context of the site's setting and the impact on heritage assets, there are significant concerns that the new architecture would not be sufficiently subservient to the retained historic buildings and the conservation area and would result in harm.

Tower and Student Amenity Building

9.225 The proposed tower would comprise of a total of 24 floors or 27 storeys and would be approximately 82m tall. The building would include a basement with plant and amenity space, a double height ground floor lobby and café, amenity floors at first floor level, 21 floors of studio accommodation with ten studios per floor, and a double height top floor for amenity space. Open air plant would be provided at the roof level. The tower would provide 210 student studio bedrooms and 494 sqm (GIA) of amenity space. The building would have a footprint of 378 sqm but due the inset resulting from the ground floor colonnade a footprint of 229 sqm at ground level.

9.226 The Design and Access Statement (DAS) explains that the tower's elevation strategy follows horizontal precast lintels and vertical brick-clad piers (similar to the approach for Blocks A, B and C) with modular repetition to reinforce the structure's singularity. The DAS goes on to set out that the building's hierarchy, which would be defined by a clear top, middle and base, would be expressed through the changing rhythm of the facade, including double bays expressed as voids in the arcade of the podium and as areas of glazing shaded by metalwork louvres at the roof lantern level.

9.227 The DAS explains that the design of the Student Amenity building would comprise of a glazed lantern above a masonry plinth, which is intended to hold the corner of the new civic square and provide a buffer to the heavily trafficked Archway Road beyond. The DAS goes on to stat that the design would expand upon its key utilitarian functions: providing access to a subterranean bicycle store and accommodating an easily accessible backup generator for the life safety equipment of the student buildings. These spaces would be contained within and below a plinth level that allows for a

lightweight, double-height glazed lantern level above, which would be used as ‘flexible student amenity space’.

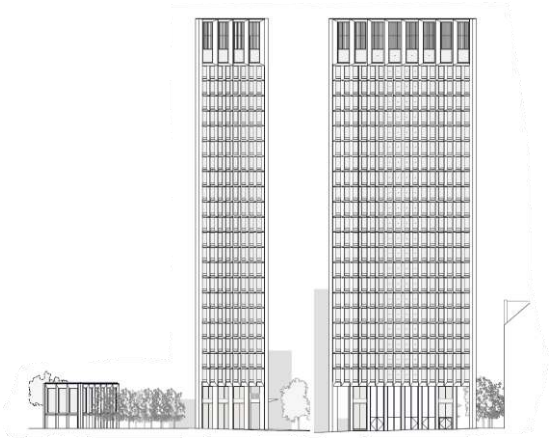


Figure 55: Elevations of the proposed student buildings (Northwest and Northeast)

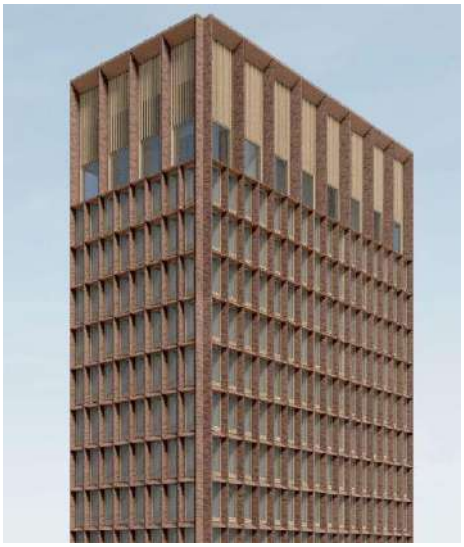


Figure 56: Visualisation of the western corner of the student accommodation tower



Figure 57: Visualisation of the proposed facade, showing the articulation of vertical brick piers and interwoven precast lintels as well as slimline, internally-beaded glazing with louvre (covering openable ventilation panel) at low-level



Figure 58: Visualisation of the glimpsed Student Amenity building beyond the arcade of the student accommodation tower.



Figure 59: Visualisation of Clerkenwell Square with the base if the tower (left) and the student amenity building (right)

9.228 With regard to the appearance of the proposed Tower and Student Amenity Building the Urban Design Officer has provided the following observations, with officer comments provided beneath:

"The tower, whilst too tall, is also well designed with similarly deep reveals and rich and rhythmic fenestration modulations. It has a clearly identifiable base, 'middle' and crown adding to its architectural quality."

9.229 Visually, and again taken in isolation, the elevational treatment of the proposed tower is well considered, and the building would form a dominant and visually prominent piece of architecture. However, in the context of the site, the proposed tower is not considered to be well designed as its scale, height and massing responds poorly to the constraints of its context and causes significant harm. This is highlighted in detail through the visual, functional and environmental impacts identified in this report, including, but not limited to, the harm to the setting of heritage assets and townscape, intrusion into protected views and unresolved wind and microclimate concerns.

"The low rise facility building, opposite the tower to the site's south eastern edge, compliments the architecture of the tower, echoing some of its architectural detailing. It creates an effective edge of the site on what is an extraordinarily harsh urban conditions created by the gyratory and its meeting with the base of Archway Road. It achieves this with a degree of solidity to its base which is in direct response to the harshness of this specific edge condition. The public plaza is effectively screened and sheltered by the siting and scale of this element of the scheme and it is therefore supported. While there is an element of 'dead frontage' to the ground floor, this is compensated for by the drama of the double height upper floor which affords high levels of overlooking of the plaza and which helps to animates it. The plaza is further framed and animated by overlooking from the Charterhouse Building to its north and the tower to its west.

The architecture of the new build elements of the scheme is considered to be of a high standard that will contribute to the setting of the wider Archway Town centre environs."

9.230 Again, taken in isolation the student amenity building is well considered and would be consistent with the architectural design and appearance of the proposed tower. Nevertheless, as set out in the heritage assessment, and above, when taken in the context of the site's setting and the impact on heritage assets, there are significant concerns that the new architecture would not be sufficiently subservient to the retained historic buildings and the conservation area and would result in harm. It is noted that the design proposal has not set out why the eastern edge of the public plaza could be just as effectively screened and sheltered from the roadside by a less imposing building or structure.

9.231 There are also concerns, highlighted by the Heritage Officer and the Metropolitan Police Design Out Crime Officer, that the blank masonry facades and the extent of dead frontages across the site, including those at the base of the student amenity building and affordable housing blocks, form poorly considered imposing elements that could attract graffiti and vandalism.

Design Conclusions

9.232 The Urban Design Officer has advised that there are multiple elements of the proposal that are considered to be of a high quality of design including the overall urban form, the interrelationship of this form with the retained historic buildings, the legibility of the form and layouts, contextual fit, fine landscaping, and the outstanding architecture of the three residential blocks to Highgate Hill. It is noted, however, that the Urban Design Officer's position is contrary to the site-specific design guidance set out in Part 2 of the Conservation Area Design Guide and the detailed analysis set out in the heritage section above. The position is also contrary to the detailed policy analysis relating to housing quality, inclusive design, biodiversity and landscaping considered in the other sections of the report.

9.233 It is noted that the Urban Design Officer does not support the height of the proposed tower and this element of the scheme is not acceptable in principle. In addition, the proposed tower's incongruous height and scale relative to the retained buildings would result in harm to heritage assets, townscape and views.

TALL BUILDINGS

9.234 Paragraph 3.9.1 of the London Plan states that:

"Tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design."

9.235 London Plan Policy D9 (Tall buildings) states that Development Plans should define what is considered a tall building and defines tall buildings as at least 6 storeys or 18 metres. Part C relates to impacts of tall buildings and outlines that proposals should address visual, functional, environmental and cumulative impacts. Tall buildings are encouraged to provide free to enter publicly accessible areas, where appropriate, to the top of the building to allow for wider views across London.

9.236 Local Plan Policy DH3 (Building heights) Part A defines tall buildings as those above 30 metres and Part B of the policy states that tall buildings are only acceptable in principle within site allocations where there is specific reference to suitability of heights of 30m or more and/or (ii) within specific sites identified in a Spatial Strategy area. The proposal includes buildings ranging from two to 27 storeys/ 82 metres in height. The proposed PBSA tower is the tallest building at 27 storeys/ 82 metres and is, therefore, defined as a tall building.

9.237 Part E of Policy DH3 requires all proposals to meet a range of visual, functional and environmental impact criteria similar to those set out in London Plan Policy D9.

9.238 Policy DH3 is evidenced by the Islington Tall Buildings Study which is an up to date and comprehensive urban design assessment for the development of tall buildings. It conforms with policy D9 of the London Plan 2021, which requires boroughs to determine locations where tall buildings may be an appropriate form of development and identify any such locations in their Development Plans.

9.239 Islington has identified appropriate tall building locations in accordance with the guidance set out in London Plan policy D9 parts B(1) and B(2) and considers that following this process tall buildings should only be developed in the identified locations as specified in D9 part B(3).

Principle of a Tall Building

9.240 Local Plan Policy DH3 (Building heights) sets out the requirements for new tall buildings in Islington. The site is not allocated for a building above 30m in height, and the proposed construction of a new 27 storey/ 82 metre tower at the southern apex of the site, therefore, fails to meet Part B of Local Plan Policy DH3. The proposal would also fail to meet the locational requirements for tall buildings set out in London Plan Policy D9 (Part B). As such, there is an in-principle objection to the provision of a tall building in this location.

9.241 From the outset, there is recognition that the scheme is contrary to the policies of the Local Plan with respect to Tall Buildings and building height. The scheme has been advertised as a Departure from the Local Plan.

9.242 The applicant sets out in their Planning Statement that while the site does not benefit 'from in-principle support for a tall building, this does not automatically trigger a binary conflict with policy'. However, Policy DH3 states that buildings of more than 30 metres are considered to be tall buildings and are only acceptable in principle on sites where the site allocation makes specific reference to suitability for heights of 30 metres or more and/or within specific sites identified in a Spatial Strategy area.

9.243 The Archway Campus site is the subject of a site allocation (ARCH5) which does not make specific reference to its suitability for heights of 30 metres or more. Three sites within the Archway Spatial Strategy area are considered to have potential for the development of new tall buildings, as set out in Spatial Strategy area Policy SP7 Part L and listed in paragraph 2.90 of the supporting text.

9.244 London Plan Policy D9 requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development as part of a plan-led approach to managing future growth. The London Plan expects an exercise to be undertaken which assesses the potential visual and cumulative impacts and considers locations where tall buildings could have a role in contributing to the emerging character and vision for a place.

9.245 The Islington Tall Buildings Study identifies specific locations across the borough where tall buildings may be appropriate. Archway was identified as one of the strategic areas for search through the Study and then a local search was undertaken to identify opportunities for tall buildings within this area. The local search was undertaken based on urban design and character analysis.

9.246 The sieving analysis for Archway identified 12 hypothetical sites for tall buildings. Hypothetical sites were potential sites of a reasonable scale that could come forward for comprehensive development and where, hypothetically, a tall building could be proposed. Two points on the Archway Campus site were identified as hypothetical tall building sites - Archway Campus (West) (site A-03a) and Archway Campus (South) (site A-03b).

9.247 The analysis in the Tall Building study for both hypothetical Archway Campus locations excluded the site on local character grounds. It was considered that a tall building in either location would detract from the character of the Holborn Union Infirmary Conservation Area. In addition, it was considered that a tall building on the Archway Campus (South) site would intrude on the Local View to St. Paul's from Archway Bridge (LV5).

9.248 It is noted that the applicant has appended a letter from the Design Review Panel (DRP) setting out that they 'support the tower in principle'. However, the letter also notes that the information presented to DRP was incomplete so they could not assess the impact of the building on LV5a.

Visual, functional and environmental impacts of a tall building

9.249 Policy DH3 Part D states that proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part E of the policy. Part E of Policy DH3 guides an assessment of the visual, functional and environmental impacts of tall buildings similar to the criteria set out in London Plan Policy D9. Notwithstanding the in principle policy objection to a tall building in this location under Part B of the policy, an assessment against Policy DH3 Part E is set out below and each of the criteria are taken in turn:

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

Visual Impact

i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;

At the ground plane the proposed tower would provide an improvement to the existing situation by better connecting the site to the neighbouring Archway Town Centre, through the opening up of the south of the site and creating new areas of public realm. The opportunity to provide active ground floor uses that draw people across Navigator Square from the town centre into the space would help to further enhance this, whilst also helping to activate the proposed new areas of public realm at the base of the tower. In this regard the ground floor elements of the proposed tower would help to protect the legibility and identity of the area and reinforce both the location and function of the town centre. Given the proposed tower's distinctive design, scale and height it would become a landmark, however, this does not infer that this would be a positive landmark.

As set out in the Heritage section of this report there are significant concerns that the scale and height of the proposed tower would detract from the setting of heritage assets and as a result of the harm would fail to create a positive landmark within the townscape. This includes the complete demolition of the historic Nurses accommodation wing - a non-designated heritage asset that makes a positive contribution to the character or appearance of the conservation area - to make way for the proposed tower. It is considered that the loss of the nurse's wing would damage the character, appearance and understanding of the site and conservation area and harm the architectural design and remaining historic appearance of the buildings. In addition, the Holborn Union Infirmary Conservation Area's character and significance relates partly to enclosure and the removal and loss of the boundary at south-west and across the southern side of the site would be harmful to character.

Given the above, it is considered that proposed tower would not create a positive landmark within the townscape and as a result would be contrary to criteria (i).

ii) Protect or enhance strategic and local views;

<u>LVMF: Panorama 1A. View from Alexandra Palace terrace</u>

The proposed tall building would be visible in the LVMF Panorama 1A. The LVMF's introduction to the panorama includes:

> *"The viewing terrace at Alexandra Palace, set in 196 acres of parkland on the rising ground of Muswell Hill, provides a panoramic view to the south. A predominantly vegetated ridge running across the view forms a distinction between the middle ground and the background. This distinction is crucial to the quality of the panorama."*

The LVMF describes the panorama as follows:

> *"The middle ground rises from the park to a ridge running east west across the panorama. This part of the view has a broadly residential character dominated by red brick terrace houses, pitched roofs and mature vegetation interspersed by church spires and public buildings. The wide background of the panorama includes a number of focal points. These include a cluster of taller buildings in the City of London, incorporating St Paul's Cathedral, Euston Tower, BT Tower, Centre Point and the Shard. From some positions, a second cluster of tall buildings at the Docklands is visible, beyond an open middle ground. The peristyle, dome and lantern of St Paul's Cathedral are particularly visible from the eastern entry to the terrace, owing to a dip in the east west ridgeline."*

The Visual Management Guidelines state:

> *"New tall buildings in the panorama should consolidate and improve the composition of the existing clusters of towers and preserve the distinction between the lower density residential character of the middle ground and the higher density character of central London in the background."*

It continues: *"Development that breaches the vegetated ridgeline should not compromise the distinction between the middle ground and background. All development should make a positive contribution to the existing characteristics of the view."*

In their consultation response, Historic England note that these panoramic views are sensitive to large scale development in the medium and foreground of views towards St Paul's and the Palace of Westminster. The tower would impact the distinction between natural and urban silhouettes in these views, muddying the clear distinction between the lower heath and Highgate Hill, and the larger urban cluster and historic skyline of central London.

The proposed tower would breach the ridgeline in the Panorama and would be visible in the view rising up above the ridge. It would not appear to be part of either of the clusters of tall buildings described in the LVMF. However, it would mainly appear where there are modern and relatively bulky blocks of flats that are on the northern side of the ridge. Its height would lead to it being in breach of the guidance relating to the ridgeline, but its position and context lessens the impact it might otherwise have. While in heritage terms the impact on this view would be at a lower level of harm, the proposed tower's breach of the Panorama ridgeline would not protect or enhance the view in accordance with the criteria set out in Local Plan Policy DH2 Part J in addition to the failure to comply with Policy DH3 Part E (ii).

Local Views LV4 and LV5

Designated Local Views LV4 and LV5 pass through part of the site. Local view LV4 from Archway Road to St Paul's Cathedral clips the southern part of the eastern boundary of the site with Archway Road. Local view LV5 from Archway Bridge to St Paul's Cathedral covers a broad strip through the eastern part of the site, including the eastern sections of the Charterhouse and Clerkenwell and Nurses wing buildings and the Main Range administration block.



Local view LV4 from Archway Road to St Paul's Cathedral



Local view LV5 from Archway Bridge to St Paul's Cathedral

As previously addressed no modelling of view LV4 has been provided by the applicant in the submitted supporting material. Additional view analysis has been requested from the applicant to demonstrate this position but at the time of writing no further details have been provided. Given this technical information has not been submitted, a detailed assessment of this cannot be undertaken and in the absence of evidence to demonstrate otherwise, it must be considered to not be acceptable.

The proposed tall building would encroach into the designated view corridor of Local View LV5 from Archway Bridge to St Paul's Cathedral. While no wider than the existing encroachment from the neighbouring Vantage Point building (Archway Tower), the proposed tower would be in front of Vantage Point when viewed from the bridge and considerable height above the neighbouring

building would be apparent. Accordingly, the proposed tall building would consolidate the encroachment into Local View LV5.

Protected views policies are intended to operate over the long term, to preserve and enhance important public views now and for generations to come. Over time the policy aim is for the new development to enhance the view and not to continue to adversely impact on the view. The proposed tower would not achieve this aim given its intrusion into Local View LV5 and its excessive puncturing of the Highgate Ridge as viewed from Alexandra Palace.

This encroachment into LV5 would be contrary to the aims of Policy DH2 Part J which seeks to protect or enhance local views in addition to the failure to comply with Policy DH3 Part E (ii).

iii) Conserve and seek to enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance (including in neighbouring boroughs where impacted);

This is considered to be one of the most significant failings of the tower with its incongruous relationship with the Holborn Union Infirmary Conservation Area and the characteristics of its locally listed buildings. The tower is better related to the adjacent town centre urban form to the south west than to the historic urban form to its north east.

As previously addressed, the proposals have been considered against Historic England's 5 stage assessment of development within the setting of Heritage Assets.

There is a considerable number of heritage assets in the vicinity of the proposed tall building. Most would have their setting (the surroundings in which a heritage asset is experienced) altered in some way due to the visibility of the proposed tall building. The heritage assets thought to be most adversely affected by the proposed development are set out below.

Holborn Union: its landmark tower and imposing Main Range and buildings, boundary enclosure and greenery contribute to significance by showing the layout of the hospital with greenery and exercise areas for the patients and the dominance of the main hospital building in the site and surroundings. The landmark Main Range tower still dominates the site. The proposed tall building would crowd the setting of the heritage buildings and undermines the hierarchy of the site leaving Main Range inappropriately lessened in importance. This would be harmful to the character and appearance of the conservation area and setting.

Waterlow Park: is a registered park and garden at grade II* and the registration entry refers to it being renowned for its views, "it was renowned for its magnificent views. The park is well preserved and still has fine views". It was referred to as a "garden for the gardenless". There are few visual incursions into the surroundings of the park when inside the park, although the top of Vantage Point tower can be seen. There is tree cover around the park. The proposed tall building would rise above the trees and be visible as a nearby urban intrusion into the parkland setting to the detriment of the setting of the designated heritage asset. This is demonstrated in View 24 of the AVR. The ZTV shows other areas of theoretical visibility including nearer Lauderdale House, however these views have not been scoped by the applicant. The registration entry includes: "There are good views from the higher ground southwards towards central London and the City. The boundaries of the park are marked by a mixture of walls and fences".

Highgate West Cemetery: No views have been provided from within Highgate West Cemetery which is a grade I registered park and garden, but the ZTV shows lesser theoretical visibility and there is considerable tree cover. AVR View 15 from Makepeace Avenue (Holly Lodge Estate Conservation Area) shows that the Tower would be visible above Highgate East Cemetery which is a grade I registered park and garden. From the AVR, this appears to be the only visual incursion above the cemetery tree line on this sight line and therefore disrupts the setting of an enclosed sylvan cemetery that is of high heritage value. Two views have been scoped in the East Cemetery, but not on the same sight line as Makepeace Avenue, so that has not been tested. On AVR View 16 at the southern end of the cemetery, the tower would be visible in winter views from the cemetery. It would be at some distance and has an element of tree cover that the view from Makepeace Avenue does not. If there were to be any change to the tree cover the tall building would be more visible and this would be a visual incursion.

St Joseph's: The church of St Joseph's on Highgate Hill is a Local Plan landmark (LL1) and it is listed at grade II*. There are views up Holloway Road to St Joseph's and its dome and its situation on raised ground, together with its imposing architecture, give a prominence and grandeur to the church. It is also viewed from the north on Highgate Hill's higher ground and in places from within Waterlow Park. This setting is a part of its significance. AVR View 31 shows that the position and height of the proposed tall building would create a canyon effect with Vantage Point when St Joseph's is viewed from Holloway Road, diminishing the prominence of the church and its dome. It would also be affected in views down Highgate Hill where the tall building would be a dominant and eye catching addition to the view (for instance View 13). The tall building would be harmful to the setting and significance of St Joseph's and fail to comply with Local Plan policy DH2 K which seeks to ensure the prominence and setting of designated local landmarks.

St John's Conservation Area: The St John's Grove conservation area is on the Historic England Heritage at Risk register. It borders the site to the south and contains the historic buildings on Navigator Square and residential areas to the south. The pub on Navigator Square is a prominent building in the townscape, is locally listed, and the tower of Main Range and some of the infirmary buildings can be seen above and to the side of it. The setting of the conservation area is varied and fractured in places (for instance with Archway island's tall buildings) but the pub still holds a townscape place. However, the proposed tall building would rise immediately behind the pub lessening its dominance and setting (AVR View 2).

As a result, it is considered that the proposed tower would fail to comply with Policy DH3 Part E (iii) and this weighs negatively against the scheme in the planning balance.

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

As set out in the Heritage section of this report, there are significant concerns that the scale and height of the proposed tower would detract from the setting of heritage assets. It is considered that the scale and height of the proposed tower would not be proportionate nor compatible to the surroundings and the character of the area.

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

There is no site specific nor spatial strategy that promotes a tall building on this site. Conceptually the architectural design, including detailing and materiality, of the tower is considered to be of a high standard. However, the tower is contrary to the tall buildings policy, does not align with the design principles set out in the relevant site allocation, and as previously noted, would be harmful to protected views and result in less than substantial harm, at the upper levels of harm, to the setting of heritage assets. Subsequently, the tall building would not represent exceptional design nor would it positively contribute to the skyline nor immediate locality .

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

In urban design terms the proposed tower is considered to meet the ground in a successful manner with increased levels of potential interaction and animation designed to interact with the adjacent public realm. Notwithstanding this, the tower results in identified harm to heritage assets, partly as a result of its excessive height, and the overall tower height does not transition well to the lower heights of the site, instead it results in a dramatic change in height.

As a result, it is considered that the proposed tower would fail to comply with Policy DH3 Part E (vi) and this weighs negatively against the scheme in the planning balance.

vii) Protect or enhance the settings of local landmarks.

As previously addressed in this report, the proposed tall building, by virtue of its height and visual impact, does not meet this policy requirement. In some settings of local landmarks in the medium or longer terms range, the tower could be assessed as having a neutral impact, however, those impacts increase on those nearer the site. The quality of the architecture helps mitigate the impact on setting.

However, height and massing are such that the proposed tower would fail to comply with Policy DH3 Part E (vii) and this weighs negatively against the scheme in the planning balance

Functional Impact

viii) Not prejudice the ongoing functionality, amenity, operation and/or development potential of sites in the local area including neighbouring boroughs, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);

London Plan policy D9(C) outlines functional impact considerations for tall buildings, as follows: a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants;

Given the nature of the site, surrounded on three sides by busy roads, and the distance to neighbouring development sites to the south, east and west, the proposed development would be unlikely to prejudice the functionality, amenity, operation and/or development potential of sites in these directions.

While there are limited impacts to amenity to properties immediately to the north of the site, these are considered, on balance to be acceptable. Furthermore, the proposals would be unlikely to prejudice the functionality, operation and or development potential of potential sites to the north.

It is not considered that the proposals would impact the functionality or operation of any neighbouring sites.

ix) Ensure that impacts on the levels of daylight and sunlight – both into and between proposed buildings and for adjoining land or properties - are fully assessed and found to be acceptable; and that unacceptable overshadowing is prevented;

The proposal would result in impacts to daylight, sunlight and overshadowing for a number of neighbouring properties and amenity spaces. Whilst this is acknowledged to be harmful and weigh against the proposal, for the reasons set out in the following 'Neighbouring Amenity' section, it is considered that, on balance, the resultant daylight and sunlight impacts of the proposals are considered to be acceptable, in this case.

However, the proposed development has unacceptably low levels of daylight/sunlight to a number of the proposed homes. While this may not be directly attributable to the tall building, the tall building represents a significant part of the scheme and influences the overall proposals with regard to layout, design and access to natural light, such that it is considered that the proposal is considered to not meet Policy DH3 Part E (ix)

x) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans must include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services;

Details have been submitted in regard to peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services. These details are assessed in following sections and it is considered that they confirm the development would operate and function successfully.

Environmental Impact

xi) Promote exceptional sustainable design standards;

As detailed in the 'Energy and Sustainability' section below, the proposals do not meet a range of sustainable design and green infrastructure policies including S1, S2, S3, S4, S5, S6, S7, S8, S9, S10, G4 and G5 or, in some instances, the information provided to date is not sufficient to demonstrate how the proposals can meet the above policies.

As such, the proposal would fail to meet the requirements of Policy DH3 Part E (xi)

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

As detailed in this report, the EIA review highlights issues with the submitted wind and microclimate assessment, considering that the inputs may be optimistic and non-conservative, resulting in more favourable outcomes for the development. The reliability of the proposed wind mitigation measures are also questioned. The target criteria (i.e. walking, sitting etc.) upon which the assessed negligible residual effects are assessed are not considered appropriate and the assessment should either be amended or further justification be provided to support the target criteria applied.

Furthermore, with regard to the proposed wind mitigation measures, the wind tunnel model in Appendix 8.2 of the submitted ES suggests that the modelled trees had very dense canopies, far denser than applied by many specialist wind consultancies to represent deciduous wind tunnel trees in winter. The stated tree heights, at up to 8–10m, also appear relatively large for initial, upon-planting (as typically applied), heights. The proposed porous screen introduced in the southeast corner of the site also appears too small to fully mitigate accelerated winds occurring across the relatively open space around this location.

As a result, it is considered that the proposal does not provide sufficient technical detail and/or mitigating features in relation to microclimate to demonstrate compliance with the requirements of Policy DH3 Part E (xii). This weighs negatively against the scheme in the planning balance.

xiii) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology.

The Council's Ecology consultant has advised that the submitted Preliminary Roost Assessment and Ecological Appraisal reports are based on outdated data and have recommended that updated surveys are undertaken with updated reports provided. In addition, it is noted that Archway Park, a Site of Local Importance for Nature Conservation (SINC), lies 50m east of the application boundary and the proposal could result in an indirect negative impact on this SINC due to increased recreational use. The Ecology consultant has recommended that this should be addressed in updated reports.

The submitted sustainable drainage details confirm that the proposal would result in improved water run-off rate and would not result in an increased risk of flooding on the site

In terms of Biodiversity Net Gain (BNG) the Council's Ecology consultant has advised that the applicant's Biodiversity Gain Plan does not include maps showing the existing and proposed habitats classified to the BNG Metric Habitat Classifications and no description of habitat parcels

are given. Furthermore, there are mistakes in the metric, habitat parcel references are missing and condition assessment sheets have not been provided. In addition, the number of retained trees shown on maps does not concur with those within the report (T33-T36 are stated as being retained in the arb report, and in the BNG report, but is not shown as retained on the proposed map). It is therefore been possible to determine the baseline habitat units or whether the development will result in a net gain in Biodiversity Units.

As a result, the applicant has not demonstrated at this stage that the proposal would not result in adverse individual or cumulative impacts on biodiversity. This is therefore contrary to Policy DH3, Part E (xiii) and this weighs negatively against the scheme.

Tall Building Conclusions

9.250 The site is not allocated for a tall building, and the proposal is therefore contrary to Policy DH3 Part B.

9.251 Turning to the assessment of the visual, functional and environmental impacts of tall buildings under Part E of the Policy DH3 the proposal fails to demonstrate compliance with the following criteria:

- The proposal fails to protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place contrary to criteria (i).
- The proposal fails to protect or enhance strategic and local views, namely the LVMF: Panorama 1A. View from Alexandra Palace terrace and Local View LV5 from Archway Bridge to St Paul's Cathedral, contrary to criteria (ii).
- The proposal fails to conserve and enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance, including the Holborn Union buildings, Waterlow Park, Highgate West Cemetery, St Joseph's Church and St John's Conservation Area, contrary to criteria (iii).
- It is not considered that the scale and height of the proposed tower would be proportionate and compatible to their surroundings and the character of the area contrary to criteria (iv).
- The proposed tower, by virtue of its current height and thus visual impact would fail to protect or enhance the settings of local landmarks contrary to criteria (vii).
- The proposals do not meet a range of sustainable design and green infrastructure policies and therefore fail to promote exceptional sustainable design standards contrary to criteria (xi).
- The proposals fail to satisfactorily demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site, contrary to the requirements of criteria (xii).
- The applicant has not demonstrated at this stage that the proposal would not result in adverse individual or cumulative impacts on biodiversity, contrary to criteria (xiii).

9.252 Policy DH3 Part D is clear that proposals for tall buildings must satisfy all of the criteria listed in Part E of the policy. As set out above the proposal would be contrary to Policy DH3 Part E (i), (ii), (iii), (iv), (vii), (xi), (xii), (xiii). For these reasons the proposal is also contrary to London Plan Policy D9.

9.253 Given the above, the proposal represents a significant departure from the Development Plan that is not justified and introduces harm. This weighs significantly against the proposals in the planning balance.

Townscape and Views

9.254 A townscape and visual impact assessment (TVIA) accompanies the submission and includes views from various viewing locations. The impact of the height of the tower on the broader townscape has

been assessed and it is found to be too tall for its context resulting in harm. This is evidenced in a series of views that have been modelled by the applicant from close, medium and long distance vantage points.

9.255 A detailed assessment of the impact of the tower on the setting of heritage assets is provided in the Heritage section of this report.

9.256 The excessive height of the tower is the cause of concern given its intrusion into multiple views with associated townscape impacts, and its incongruous height and scale relative to the retained buildings and form within the Holborn Infirmary Conservation Area.

9.257 The tower would be visible in the long-distance views from vantage points including in the LVMF panorama from Alexandra Palace and AVR View 34 from Parliament Hill at Hampstead Heath. The tower is clearly visible in these long distance views and due to its height, it would disrupt the legibility of the ridge line to an excessive amount. While some penetration may not be unacceptable, the height is incongruous given the tower's position on the ridge (and height) reading as an isolated 'interruption' that it is assessed to be harmful as a result.

9.258 The applicant has provided a heritage asset plan overlaid with a Zone of Theoretical Visibility (ZTV). This is further cause for concern with regard to the height of the tower given it suggests far greater visibility from across multiple areas of north London, including from highly sensitive sensors, than the modelled views would indicate.

9.259 While the appearance of a tower in the skyline is not necessarily in itself harmful in townscape terms, it is the sensitivity of the 'receptor', be that landscape, ridge line or setting of a building, that requires a careful assessment as to the extent of the impact caused by the height, massing and architectural quality of the tower that is of importance. A reduction in height would have a beneficial impact on all those views from where the tower would be visible, would remove it from sight altogether from some vantage points, and would materially lessen its visual impact and degree of intrusion in others in terms of townscape impacts.

QUALITY OF RESIDENTIAL ACCOMMODATION

9.260 The Housing Design Standards LPG, Part A1, states that design proposals should respond positively to the unique characteristics of the site in its wider physical context by demonstrating how the scheme responds to the underlying topography and landscape; the character and legibility of the area; and local patterns of buildings, streets and materials

9.261 Local Plan Policy H4 states that all new housing developments (including conversions and changes of use) must be designed and built to a high quality for the duration of its lifetime.

Space Standards

9.262 London Plan Policy D6 Part A requires housing development to be of high-quality design and provide adequately-sized rooms (in accordance with Table 3.1 in the London Plan) with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

9.263 Moreover, housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

9.264 Local Plan Policy H4 Part D requires development to meet or exceed the minimum space standards in the London Plan and Supplementary Planning Guidance. Criteria (i) and (ii) require provision of storage space, consideration for how waste and recycling are stored, collected and managed.

9.265 All dwellings in affordable housing Blocks A, B, C comply with the internal space standards set out in the London Plan and Housing Design Standards LPG. There are three duplex family homes (3 and 4 bedrooms) in Block A that exceed the best practice standards by 50sqm or more, and one of them includes a study. In addition to the 4 x one-bedroom wheelchair accessible units which are larger than minimum space standards, there are 4 other one-bedroom flats within Block A which include studies.

9.266 All dwellings in the market housing comply with the space standards set out in the London Plan and Housing Design Standards LPG. The four-bedroom unit in the Holborn ventilation spire significantly exceeds the best practice standards (70+sqm) and includes a study.

9.267 Paragraph 3.73 of the supporting policy text states that 'units which significantly exceed the minimum space standards will not be considered to be making optimal use of a site/land and would, therefore, not be consistent with Local Plan Policy H2. Provision of studies is also considered to be sub-optimal and should not be used as a means to circumvent space standards by subsequently utilising them as additional bedrooms'. However, given its unique and unusual layout the anomalous Holborn spire unit is considered to be acceptable in this instance.

9.268 The provision of built-in storage has been included in accordance with the space standards.

9.269 The Recycling and Waste Management Plan outlines the locations of refuse stores for the heritage buildings, affordable housing buildings and the student accommodation buildings, and mentions these have been located within the 10m drag distance from refuse vehicle stopping points.

Floor to Ceiling Heights

9.270 Local Plan Policy H2 Part F requires that new development provides a minimum floor to ceiling height of 2.6m in all habitable rooms. In residential conversions a lower ceiling height may be acceptable where it is demonstrated that a good standard of daylight, natural ventilation and useable floorspace are provided.

9.271 In the affordable housing blocks, all habitable rooms have a floor to ceiling height of 2.6m for at least 75% of the GIA. In corridors and bathrooms ceiling heights go down to 2.4-2.5m to allow for services.

9.272 In the Holborn Union converted building, the minimum ceiling height would be 2.5m, due to the internal arrangement of split-level duplex flats to maintain the original windows and façade. The Charterhouse and Admin converted buildings would achieve the required 2.6m ceiling height.

Tenure Blind

9.273 Policy H4 Part G requires layout and design to accord strictly with tenure blind principles to maximise opportunities for social interaction. The affordable and market units are provided in separate areas within the development. The affordable homes would be located in the new build blocks A, B and C. Block A includes both social rented homes and London Living Rent homes. In the Affordable Housing Statement, the applicant indicates they have approached a number of Registered Providers and they indicated that the provision of affordable homes in converted heritage buildings should be avoided due to constraints and potential high service charge costs, instead preferring new build provision is considered to be preferable in this instance. As such, while there is separation between the tenures, each of the relevant tenures would be in an appropriately designed building.

Daylight

9.274 London Plan Policy D6 Part C states that housing development should demonstrate adequate daylight. Similarly, Local Plan Policy H4 Part F states that new housing development must demonstrate a good standard of daylight.

9.275 The Climate Based Daylight Modelling (CBDM) methodology is based on target illuminances from daylight. This is the Daylight Illuminance (DI) to be achieved over half the area of the room (measured on a reference plane at tabletop level) for at least half of the daylight hours in a typical year. The calculations are based on weather data files which cover different regions of the UK. The calculations are done for each hour of the day for every day of the year. There are 8760 hours in the year, of which 4380 are daylight hours, and therefore the targets should be achieved for 2190 hours in the year. The methodology uses a more accurate sky model which simulates the movement of the sun throughout the day and accounts for the weather conditions at the time. As a result, CBDM accounts for the presence of sunlight and therefore the orientation of the rooms/windows is accounted for. A south facing room is likely to have access to higher levels of natural light than a north facing room and as a result, a north facing room would typically need larger windows to comply.

9.276 The recommended median illuminance Lux level targets for habitable rooms are as follows:

- Bedroom 100 Lux
- Living Room 150 Lux
- Kitchen 200 Lux

9.277 Where a room has a shared use, the highest target should apply. However, Local Authorities can use discretion, and a living room target of 150 Lux could be used for combined living/kitchen/dining rooms if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in the design.

Internal Daylight & Sunlight Assessment

9.278 Detailed daylight illuminance testing results have been submitted demonstrating the amount of daylight within the proposed residential accommodation, both in the new build residential blocks and the converted historic buildings.

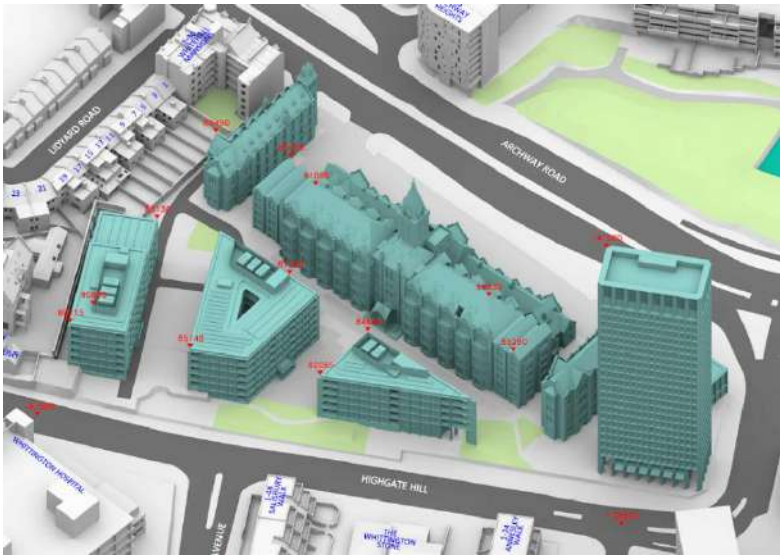


Figure 60: Axonometric view of the proposed development and surrounding properties looking north east



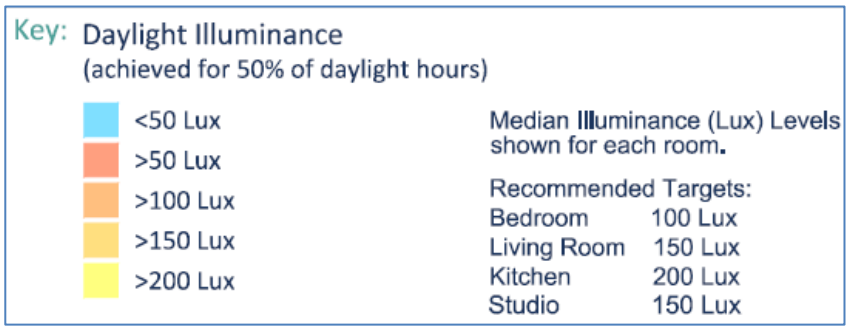
Figure 70: Axonometric view of the proposed development and surrounding properties looking south west

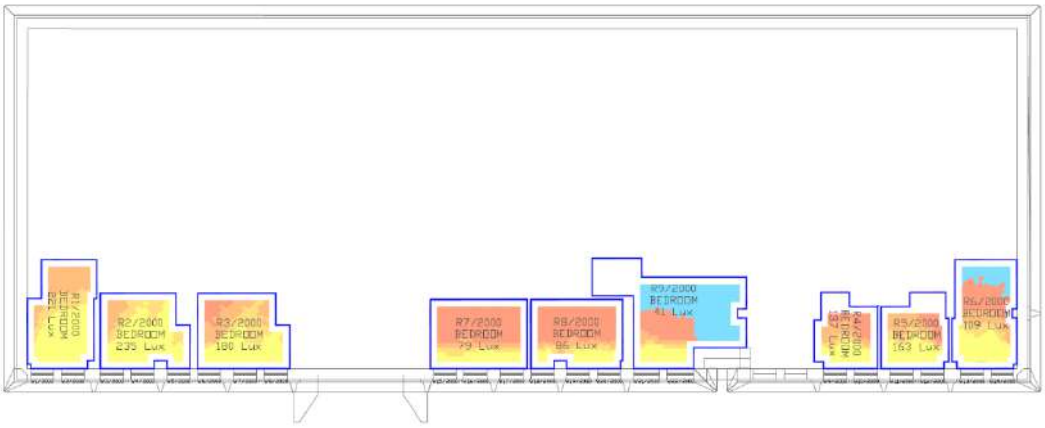
New Build Affordable Blocks A, B and C

9.279 In the affordable blocks (A, B and C) there are significant transgressions in the daylight illuminance testing at ground, first and second floor levels. Only 74 (72%) of the 102 rooms assessed comply with the daylight illuminance recommendations. While it is appreciated that in the case of Block B the position of the inset external amenity areas results in greater transgressions, the extent and quantum of transgressions is concerning. Where there are two rooms at each floor that are <50lux, both are bedrooms. It is however noted that one of the bedrooms is dual aspect and the rest of the rooms in the flat are well lit.

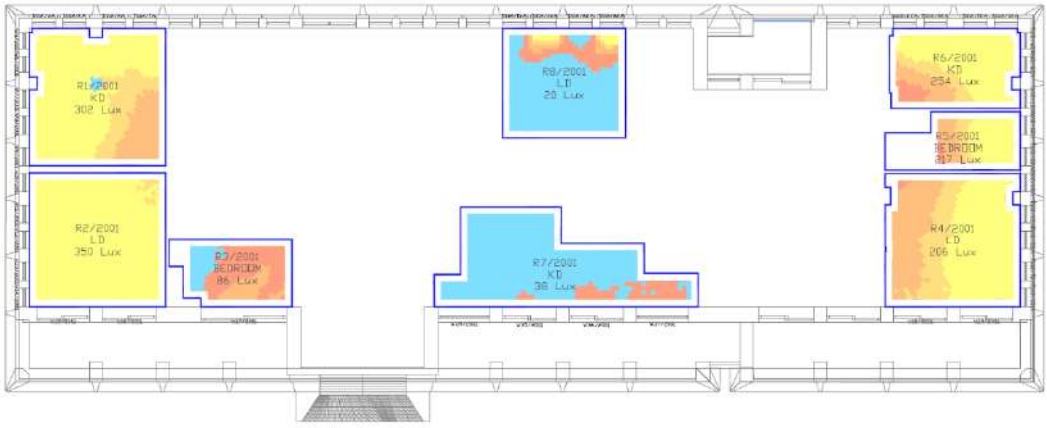
9.280 The submitted report contends that many of the rooms which fail to meet the recommendations are situated behind/below balconies, and that the presence of balconies should not be considered a hinderance as these amenity spaces would provide vital private outside space for the future occupants. Furthermore, the design of the proposal has ensured that the derogations primarily impact bedrooms, as these rooms have a lower expectation of daylight and are linked to primary living spaces (such as LKDs) which have superior daylight.

9.281 The assessment results for blocks A, B and C are displayed in the tables below:





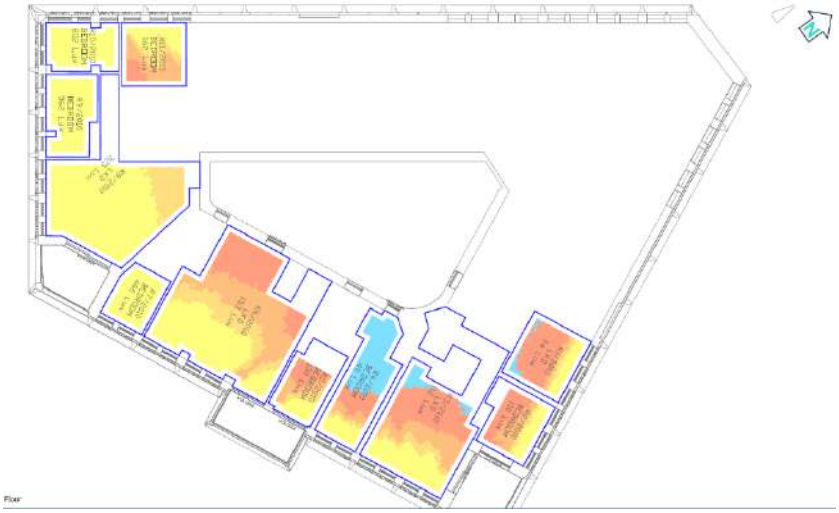
Block A, Ground Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



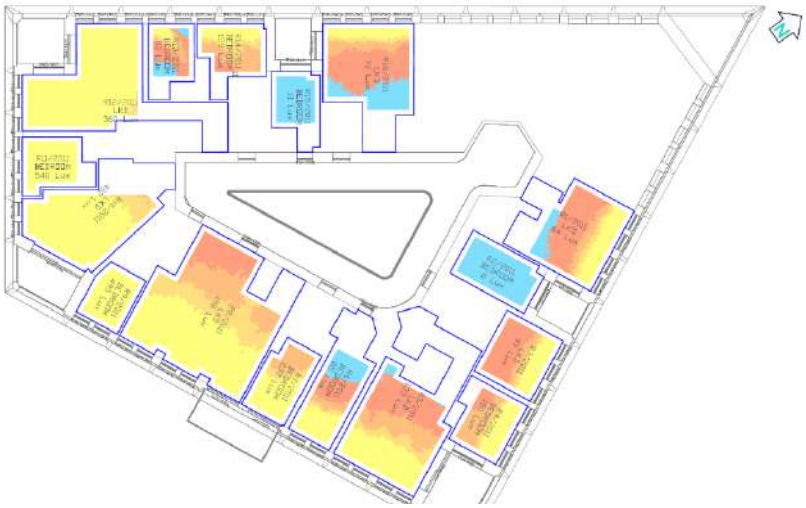
Block A, First Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



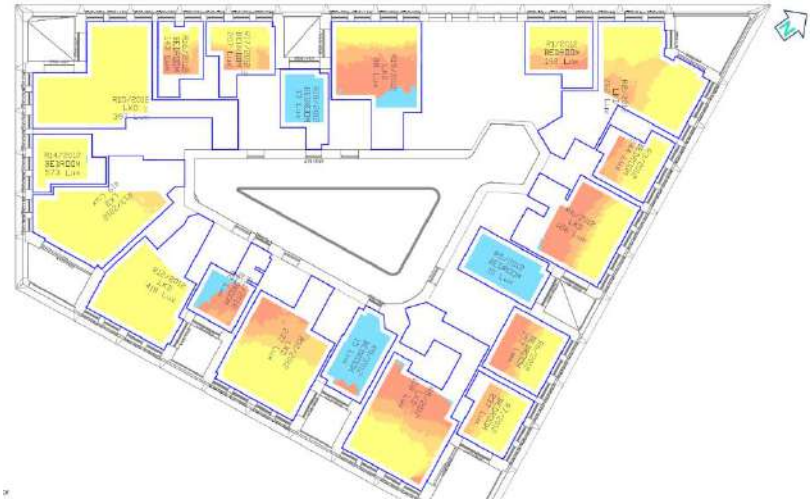
Block A, Second Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block B, Ground Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block B, First Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block B, Second Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block C, Ground Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block C, First Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Block C, Second Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels

9.282 In summary, for the internal daylight for Blocks A, B and C there are significant transgressions. Block B has the worst transgressions for the new build element, with the south most facing bedrooms being the worst affected, but it is acknowledged that this is due to the layout design with bedrooms being set back from the proposed balcony/terraces.

Sunlight in Blocks A, B and C

9.283 In terms of internal sunlight, the lowest 4 floors in Blocks A, B and C have been analysed to establish their respective sunlight hours, which relates to 34 rooms. The results indicate that 11 of 34 affordable residential dwellings, equating to 32%, would not meet the suggested target minimum level of sunlight. It is however acknowledged that these represent the lowest floors and access to direct sunlight would improve at the upper floors. Notwithstanding this, the poor levels of sunlight weigh against the proposal in the planning balance.

Heritage Buildings - Market Housing

9.284 The assessment for the heritage residential blocks includes Holborn Union Main Range, Admin building and Charterhouse. The first four floors have been analysed within each of the three buildings. The results indicate that only 99 of the 193 rooms assessed will achieve the respective target illuminance value appropriate for the rooms' usage over at least 50% of the rooms area. This provides an overall compliance rate of 51% for the lower floor rooms assessed. The submission has extrapolated the results to include the upper floors of these buildings, and when this is conducted 198 of 294 rooms achieve the recommendations, this still only provides a total compliance rate of 67% of rooms meeting the BRE Guidelines for daylight receipt.

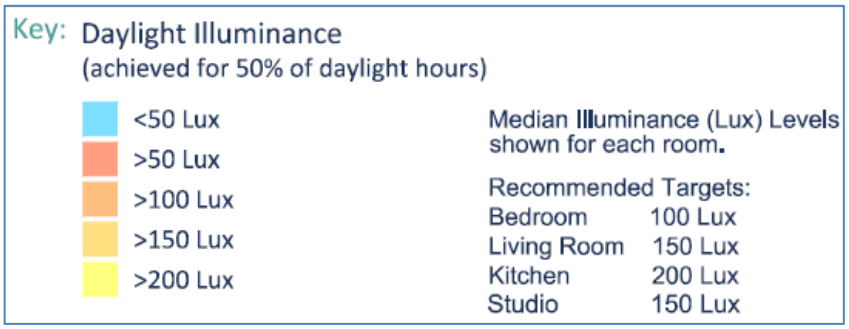
9.285 The worst failures (being below <50lux) would be to the units in the main Holborn Union building that face out into the internal courtyard (north east elevation) with Admin building. In this case it is the existing building that is causing this harm.

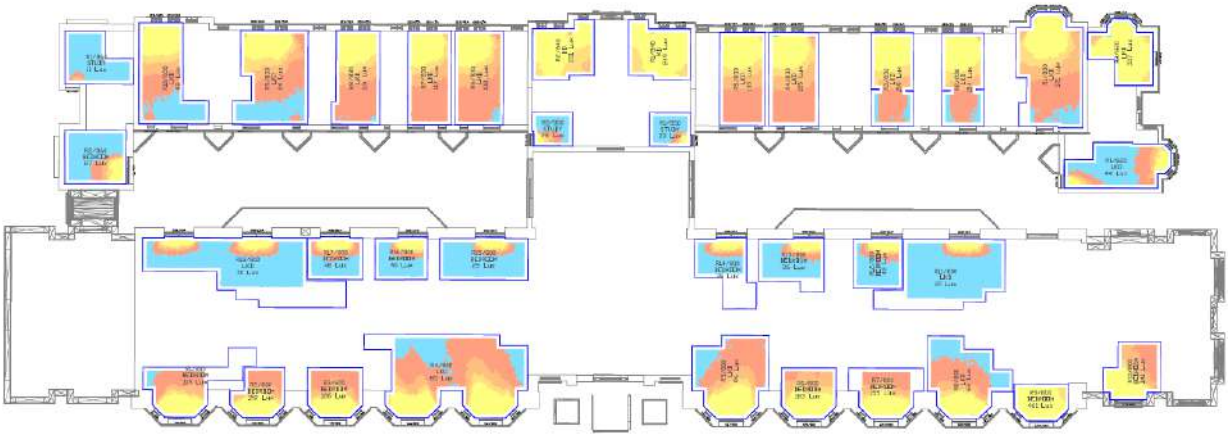
9.286 The submitted report seeks to explain the poor performance, concluding that the larger size of the proposed rooms means they tend to be deeper in floorplan terms, which has an impact on the medial lux levels. Had many of these rooms been smaller and in line with minimum space standards, the compliance rate would improve, however the applicant contends that compliant median lux levels have been sacrificed over ensuring the rooms are of a very generous size making them more desirable for the future occupants.

9.287 In addition, the applicant explains in their report that maintaining the integrity of the elevations and keeping the size and location of the windows in the heritage buildings results in compromises to internal daylighting have been made. Given the residential accommodation is being constructed within the retained facades of the buildings, it is acknowledged that achieving a fully compliant scheme would be unlikely to be feasible without delivering contrived and shallower floor plans, which

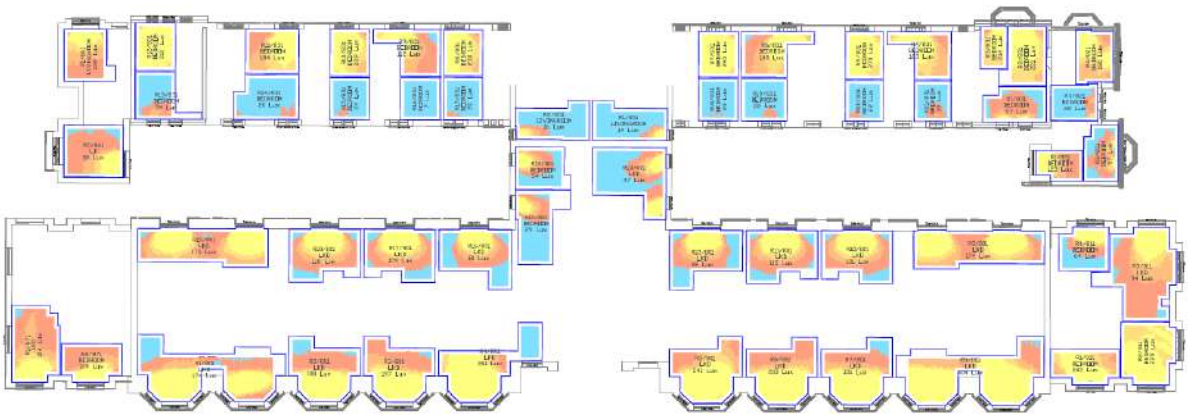
could result in poorer quality units and would not make efficient use of the deep floor plan of the building.

9.288 The assessment results for the lower floor levels of the market housing in the heritage residential blocks are displayed in the tables below:

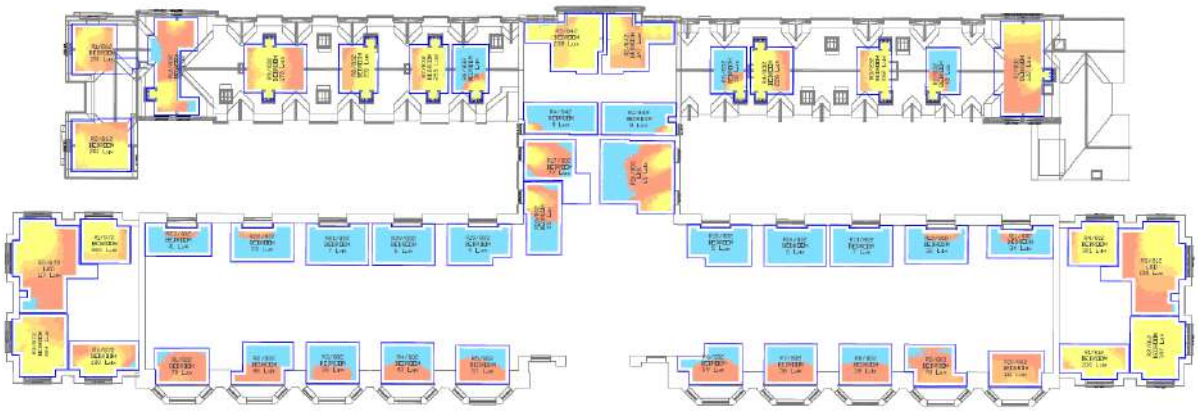




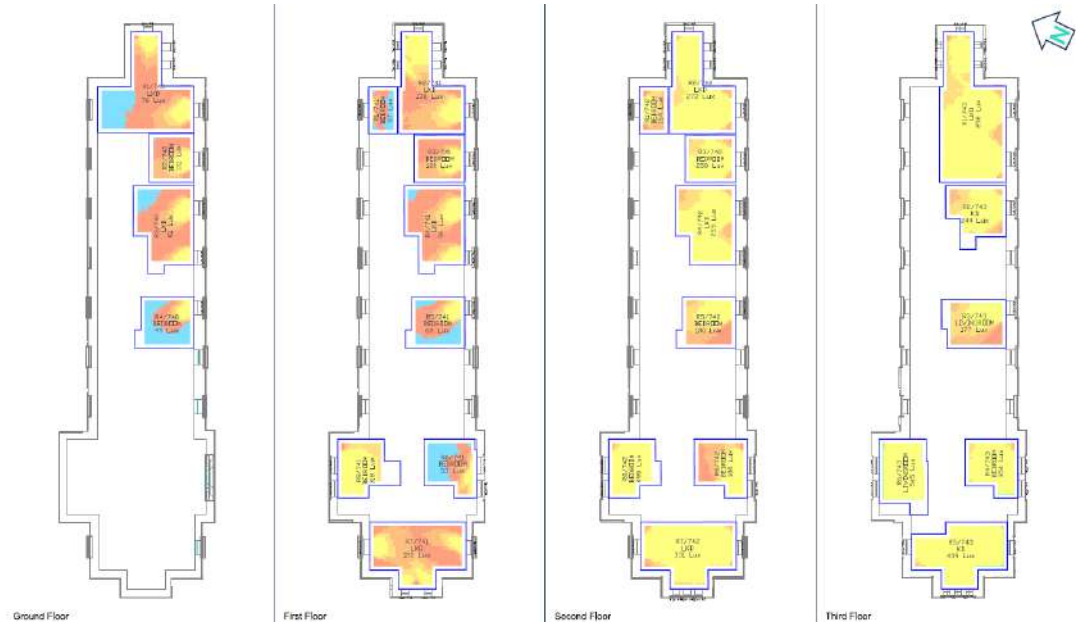
Holborn Union & Admin building, Ground Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Holborn Union & Admin building, First Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Holborn Union & Admin building, Second Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels



Charterhouse building, Ground to Third Floor - Climate Based Daylight Modelling (CBDM) Assessment Median Illuminance (Lux) Levels

Sunlight in the Heritage Buildings

9.289 In terms of internal sunlight, the lowest floors of the heritage buildings have been analysed to establish their respective sunlight hours. The results indicate that 14 of 66 market residential dwellings, equating to 21%, would not meet the suggested target minimum level of sunlight. It is however acknowledged that these represent the lowest floors and access to direct sunlight would improve at the upper floors.

9.290 Internal Daylight Conclusions

9.291 The internal daylight assessment results for the proposed new homes identify a high proportion of transgressions against the BRE guidelines in both the affordable housing and open market housing. While there is some reasonable explanation for the failures within the heritage buildings to be retained, the quantum and extent of the transgressions would result in unacceptable levels of daylight for proposed future occupiers of the proposed homes across the site.

9.292 The proposal is therefore considered to be contrary to London Plan Policy D6 Part C and Local Plan Policy H2 Part F with regards to demonstrating a good standard of daylight. This weighs negatively against the proposal in the planning balance.

Dual Aspect

Blocks A, B and C

9.293 London Plan Policy D6 Part C states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.

9.294 The Housing Design Standards LPG states that new homes should be dual aspect unless exceptional circumstances make this impractical or undesirable.

9.295 Local Plan Policy H4 Part I states that all new residential units should be dual aspect, unless provision of dual aspect is demonstrated to be impossible or unfavourable.

9.296 The proposal includes 34 (37%) single aspect homes across the affordable housing element of the scheme (Blocks A, B and C). This represents a significant percentage of the dwellings and a number of these homes would also have constrained outlooks or set back bedrooms with windows facing into internal rooms.

9.297 There would be five single aspect studios in Block A, which all face north west, and 14 x one-bedroom flats with single aspect which face south east, all situated from the second floor upwards. The Daylight and Sunlight report indicates that the studios in Block A would meet the BRE guidelines. The five studios look out onto the site boundary with the adjacent residential area. The applicant justifies that the single aspect units were the result of optimising site capacity and meeting the need for smaller units, however, it has not been demonstrated why an alternative layout and/or design could not suitably address this.

9.298 With regards to Block B there would be 18 x one-bedroom flats which would be double aspect for ventilation only, as they open onto the internal lightwell. The Daylight and Sunlight Assessment also highlights that a significant proportion of the bedrooms of these homes at the lower levels would not meet the BRE guidelines due to being located behind balconies. The outlook would be on to the new pedestrian and vehicular route on Charterhouse Way for the north west facing flats, and on to the heritage garden for the south facing flats. As such the these single aspect units would result in limited amounts of daylight and a poor outlook.

Converted Heritage Buildings

9.299 In respect of the retained historic buildings (which accommodates the proposed market housing), 44 (51%) of the proposed market homes would be single aspect. While these units would be located in the existing 'heritage' buildings on the site, it means that a large percentage of the units on site do not provide a dual aspect. The majority of single aspect units are in the Holborn building, which includes family units on the ground floor, duplex one-bedroom flats and two-bedroom flats on the upper floors. The ground floor units open on to the shared courtyard and planted defensible space on the south west façade. Furthermore, there are instances of bedrooms facing into internal spaces, set back from the outlook itself. The Daylight and Sunlight Assessment indicates that for the majority of units facing the internal courtyard the BRE guidelines are not met.

9.300 While there are constraints to the delivery of dual aspect units within the heritage buildings, namely the deep floorplates and the large, repeated window openings, when considering the lack of a dual aspect together with poor levels of daylight/sunlight the quality of these units is not considered to be acceptable.

9.301 The proposal is therefore considered to be contrary to London Plan Policy D6 Part C and Local Plan Policy H2 Part I with regards to single aspect homes. This weighs negatively against the proposal in the planning balance.

Private Outdoor Space

9.302 Local Plan Policy H5 Part A states that all new residential development and conversions will be required to provide private outdoor space, in the form of gardens (for houses and ground floor maisonettes) or balconies (for upper floor dwellings). Any provision must be of a good quality which is designed – in terms of its shape, position and location within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.

9.303 The 87 homes proposed within the converted heritage buildings would not provide any private outdoor space. The applicant states that this is due to the nature and constraints of the historic locally listed buildings, which would not allow for balconies.

9.304 The Holborn and Admin buildings would provide a shared courtyard serving both buildings, which would be accessed directly from the ground floor flats, or for other units through the building lobby.

The courtyard would include planting that screens the ground floor accommodation for privacy, and access paths. However, it does not include other amenities such as seating. Policy H5 Part F states that communal provision of private outdoor space in lieu of private outdoor space for each individual unit will only be acceptable for non-family units.

9.305 The Admin building accommodates 15 family units, the majority of which are three-bedroom properties, while the Holborn building accommodates 61 units which consist of a mix of one-bedroom units and family units. Given this, it is considered that there would be insufficient provision of amenity space for these units contrary to policy

9.306 Local Plan Policy H5 Part F (iii) requires the communal outdoor space provided to be commensurate with the type and size of accommodation it is intended to serve. This criterion is not met, as the total proposed space for the communal courtyard is approx. 450sqm, which is approximately 51% of the total quantum of private outdoor space that would be expected for the 76 residential units, which is 877 sqm. This comprises the quantum expected to be delivered for the Admin building which would be 455sqm, and the quantum for the Holborn building flats which would be 422sqm.

9.307 Criterion (iv) requires that access to communal space is not restricted particularly on the basis of tenure; this does not apply, as the building is not mixed tenure.

9.308 The Charterhouse building, which accommodates 4x one-bedroom units and 7x family units does not make any provision of private or communal outdoor space for residents. The quantum of outdoor amenity space required would be 69sqm. There is no justification why communal outdoor space has not been provided.

9.309 The new build affordable housing blocks A, B and C meet the requirements for private outdoor space for each unit in the form of balconies for upper floor flats. The ground-floor 3 and 4-bedroom duplex units in Block A do not meet the requirement in full, as the balconies provided are 23sqm, rather than 35sqm for the 6-person dwellings and 45sqm for the 8-person dwellings. The units have private access to a shared enclosed mews which adds to the outdoor space provision.

9.310 The proposed homes would have insufficient and inadequate provision of private and communal amenity space, which would result in a poor quality of amenity for future occupiers. The proposal is therefore contrary to Local Plan Policy H5 Part (iii) in terms of the provision of private outdoor amenity space and this weighs negatively against the scheme.

Quality of Residential Accommodation Conclusion

9.311 The internal daylight assessment results identify a high proportion of transgressions against the guidelines in both the affordable housing and open market housing. While there is some reasonable explanation for the failures in certain elements of the proposed development, the quantum and extent of the transgressions would result in poor levels of daylight being received in the proposed homes across the site. The provision of substandard levels of daylight results in units that have an unacceptably poor quality of amenity for their future occupiers.

9.312 The proposal includes 34 (37%) single aspect homes across the affordable housing element of the scheme and 44 (51%) single aspect homes across the market housing element. The provision of single aspect homes, studio units and poor levels of daylight and sunlight result in units that have an unacceptably poor quality of amenity for their future occupiers.

9.313 The proposal would not provide the requisite extent of private amenity space for a high number of units and the proposed communal space is insufficient, such that future occupiers would have access to insufficient amenity space..

9.314 The proposal includes 34 (37%) single aspect homes across the affordable housing element of the scheme and 44 (51%) single aspect homes across the market housing element. The provision of single aspect homes, studio units and poor levels of daylight and sunlight result in units that have an unacceptably poor quality of amenity for their future occupiers.

9.315 Given the low level of access to daylight, the excessive number of single aspect units and the insufficient provision of private and communal open space, the proposal would result in an unacceptable quality of amenity for future occupiers, contrary to London plan policy D6 and Local Plan Policy H2 and H5

Proposed Open Space Provision

9.316 Local Plan Policy G3 sets out the Council's expectations with regard to the provision of new public open space as part of developments. Part A of the policy requires developments in excess of 200 net additional residential units or 10,000sqm of net additional gross external floorspace to provide on-site publicly accessible open space. In accordance with these thresholds, this proposal is required to provide on-site public open space.

9.317 The supporting policy test at paragraph 5.21 sets out that the amount of open space that should be provided is 5.21sqm per resident and 2.6sqm per employee. Utilising these figures, and calculated using a total of 475 residents, the open space requirement would be 2,474.75sqm, as set out in the submitted Landscape Statement (Page 10). Within the same document, the total amount of open space to be provided is stated as being 7,158sqm, which would represent a 2,131sqm increase compared with the current amount of open space on the site (5,027sqm). Based on these figures, the proposal would provide substantially more than the target quantum of public open space.

Quality of Proposed Open Space

9.318 Policy G3, Part A makes it clear that public open space must be provided alongside the provision of private amenity space and landscaping, unrestricted public access must be provided and maintained in perpetuity. Parts B and C of Policy G3 set out further detailed requirements that new public open space must adhere to, part B outlines the clear priority for new public open space to be green public open space. The provision of hard landscaped public open space is identified as being potentially suitable in certain instances, for example, in the form of creating civic space and may be suitable in certain areas instead of green public open space, such as town centres. In such cases, it must be demonstrated that the provision of green public open space is not possible or appropriate. Moreover, where hard landscaping is provided, greening features such as planting and permeable paving must be maximised.

9.319 The majority of the proposed open space at the site would be hard landscaping in the form of permeable paving. In particular, the southern part of the site is dominated by hard landscaping, associated with the creation of new public spaces that open up the southern part of the site, connecting it to the Archway Town Centre through increased access and permeability.

9.320 There is, however, a lack of clarity as to the proportion of landscaping that will comprise permeable paving. While the Landscaping Plan states that 5,380sqm of permeable paving would be provided, the Landscape General Arrangement Plan illustrates that there would be a different paving material used in the southern part of the site, noting this as "Sienna Sett Sandstone". It is not clear if this paving is indeed permeable or how it would be set to enable permeability.

9.321 The remainder of the site includes aspects of new green open space, the majority of which would be provided as 'flower-rich perennial planting' amounting to 2,930sqm. The approach to the landscaping creates two areas of different character, the southern part of the site is stated as being of 'public square, town centre character', whilst the remainder of the site is stated as being characterised by a 'residential, semi-private, green character'.

9.322 Local Plan Policy G3 Part C sets out further considerations, confirming that new public open space must:

(i) Create/improve links with other green infrastructure and permeability with the wider area;

9.323 As detailed in the site allocation, the proposed redevelopment of the site presents the opportunity to improve links and permeability at the site, with alterations to the levels across the site supporting ease of movement. The proposal would increase the permeability of the site, opening up routes both east to west and north to south. The proposal would also increase connectivity to the neighbouring Archway Park which lies directly to the east of the site. Moreover, the proposal would provide increased linkages between the site and the Archway Town Centre as expected by the site allocation.

(ii) Maximise biodiversity benefits and access to nature, by incorporating areas of biodiversity that complement surrounding habitats and support the Council's Biodiversity Action Plan;

9.324 With regard to proposed biodiversity benefits of the scheme, these are addressed later in this report but it should be noted that the national Biodiversity Net Gain target of 10% would not be achieved on site. Furthermore, it is noted that further detail is required to assess how the proposals could

complement surrounding habitats. While these targets are likely to be achievable through amendments to the landscape proposals, in the absence of relevant information/justification it is not possible to demonstrate compliance with this requirement.

(iii) Maximise sustainability benefits, including urban cooling and sustainable drainage, including the use of permeable surfaces;

9.325 As noted above, the proposal seeks to include permeable pavement throughout, albeit it has not been demonstrated how this would be achieved. Alongside this, a limited quantum of rain gardens (106sqm) which incorporate sustainable drainage elements are proposed along Charterhouse Way. Further discussion with regards to sustainability benefits as relevant to the proposed landscaping is set out in the Sustainability section of the report.

(iv) be designed to be safe and accommodate and encourage physical activity for all, promoting walking, cycling and social interaction; and

9.326 The proposal will result in the site being more permeable, facilitating movement through the site. Further detail with regard to providing step-free access across the site is set out in the Accessibility and Inclusive Design section of the report, but it should be noted that it has not been demonstrated that the proposals provide an inclusive design. In addition to increasing opportunities for movement through the site, the new routes would also provide the opportunity for residents to utilise these routes for exercise in the form of walking.

9.327 The Landscape Statement details the level of proposed seating to be provided across the site. Whilst this suggests a good level of provision in the southern part of the site, associated with the creation of the new public spaces, the proposed level of provision of permanent seating across the remainder of the site is not sufficient. Notably there appears to be a deficiency of permanent seating along the main routes running through the site such as Charterhouse Way and the proposed new avenue parallel to Archway Road. Ensuring that there is a range of furniture types located throughout the site is an important consideration in encouraging people to dwell in spaces, promoting social interaction, moreover, it ensures greater inclusivity providing important opportunities for people to rest should they need it.

9.328 Additionally, the proposal includes the provision of several play facilities which provide opportunities for children of varying ages to engage in physical activity in the form of play and promotes social interaction between children and adults alike. A further assessment of the proposed Play Space and its conformity with policy requirements is provided below.

(v) be overlooked, designed and managed to meet diverse and changing needs.

9.329 The design and layout of the scheme, with the numerous areas of public open space and public realm located between the buildings ensures that the proposed open spaces benefit from passive surveillance. Despite this, there is a lack of active uses at ground floor as proposed. Active frontages would provide additional passive surveillance whilst also delivering additional benefits such as helping to activate areas of public realm.

9.330 Given the above, it is considered that the quantum of the public open space is good but there are issues with the quality and inclusivity of the space as proposed. Were the application recommended for approval, many of these issues could be addressed through a suitably worded condition requiring a detailed landscape plan to be submitted in accordance with policy. While this in itself would not address the Inclusive Design and BNG concerns raised, these are addressed separately in this report.

Play Space

9.331 London Plan Policy S4 states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m. per child. Play space should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe

walking distance, and in these circumstances contributions to off-site provision should be secured by a s106 agreement. Play space should be available to all housing tenures to promote social inclusion.

9.332 Local Plan Policy SC2, Part C requires all major residential developments to provide on-site provision for free to-use publicly accessible play space which is suitable for children and young people of all ages and abilities. The level of provision must be informed and proportionate to the anticipated increase in child population as a result of the development proposals and must be designed in partnership with Islington Council, in line with any relevant best practice standards. The ongoing management and maintenance of any on-site provision will be secured by condition.

9.333 Supporting paragraph 3.154 outlines several relevant considerations that the Council will use in determining the amount of play space required for major housing developments. This involves a consideration of the development type, amount, quality and use of existing accessible provision of play space and the anticipated child yield of the development. An expectation for the London Plan benchmark of 10sqm of play space to be provided per child is also set out within supporting paragraph 3.154, although it is recognised that this level of provision may not always be achievable in Islington's context.

9.334 Page 11 of the applicant's Landscape Statement provides an overview of the proposed play space provision and associated strategy, it states that a total of 653.6 sqm of Play Space will be provided on site, with the scheme requirement stated as being 933sqm utilising the London Plan expectation of 10sqm of provision per child. This amounts to 70% of the identified requirement being met through on-site provision.

9.335 This on-site provision is provided across the site at several locations and is provided in the form of 3 different typologies, Doorstep Play (0-4 years), Local Play (5-11 years) and Play on the Way. The below table provides a breakdown of the proposed play space provision, utilising figures provided within the Landscape Statement (P.11).

Play Typology	Scheme Requirement (sqm) (based on 10m2 per child)	Scheme Provision (sqm)	Percentage of requirement met
Doorstep Play (0-4 Years)	424	202.8	47.8%
Local Play (5-11 Years)	311	276.1	88.7%
Play on the Way	N/A	174.7	N/A
12+ Years	198	Offsite	0%
Total	**933**	**653.6**	**70%**

9.336 As detailed in the table above, the proposal would result in an under provision of on site play space for 0-4 year olds, an over provision of play space for 5-11 year olds and no provision for ages 12+. Overall, there would be a 30% under provision of play space.

9.337 In considering the quality of the space to be provided, the supporting text associated with Policy SC2 outlines an expectation for play space to be provided throughout a development and integrated within any wider networks of open space, this includes incorporating play space with trees and other natural elements. Moreover, and in line with Part D of SC2, areas of public realm and open space should incorporate opportunities for informal and incidental play in order to encourage children and young people to move around freely and safely and to better connect to more formal play provision, green spaces and parks.

9.338 Notwithstanding the under provision of on site play, a range of play spaces have been proposed across the site, inclusive of a main destination play area located on the junction of two of the main routes through the site (Charterhouse Way and Holborn Avenue). Additional play areas are provided within the proposed Heritage Garden and in the form of numerous 'play on the way' opportunities that are provided throughout the site along some of the main travel routes, this includes along Holborn Avenue, connecting the two main play areas and along Woodland Walk.

9.339 However, the findings of the submitted Daylight Report highlight that some areas of proposed play space receive less than 2 hours of direct sunlight, with this being particularly pronounced within the north of the site.

9.340 With the exception of the Doorstep Play that is to be provided within the shared private terrace associated with Block A, all of the proposed play space appears to be publicly accessible and is described as being tenure blind within the Planning Statement.

9.341 While there are likely to be further opportunities for play space to be provided along the route towards Archway Park, better connecting the site with the existing green space in line with G3(c) and SC2(d) and helping to activate the eastern part of the site within the site, these do not form part of the proposals. Issues are also raised later in this report with regard to the accessibility and safety of the playground due to its proximity to the servicing road.

9.342 The applicant has noted in the submitted Planning Statement that play space for ages 12+ is to be provided off site at Archway Park and Girdlestone Park. These are both designated open spaces with existing provision within for play and informal play accommodation ages 12+. Details of what off-site play space would be provided and details of any agreements as to what and how this has would be delivered in partnership with the Council's Parks Team have not been provided. Furthermore, a legal agreement securing the delivery of a contribution for any such off-site provision has not been agreed.

9.343 Given the insufficient quantum of, lack of provision across all relevant age ranges and poor quality of the play spaces proposed, it is considered that insufficient provision has been made for play space, contrary to London Plan Policy S4 and Islington Local Plan SC2.

QUALITY OF STUDENT ACCOMMODATION

9.344 Local Plan Policy H6 Part B (i) requires student accommodation to meet the relevant requirements for residential quality in Policy H4, including to provide good-sized rooms and communal space.

Space Standards

9.345 While there are no minimum space standards set out in policy for student accommodation, Policy H6 B (i) requires the provision of 'good-sized' rooms and communal space. Supporting paragraph 3.96 indicates that bedrooms and separate communal/amenity areas should consider HMO guidance as a starting point to considering good sized rooms.

9.346 The standards used by Islington to assess the suitability of HMOs indicate that for one occupant, the minimum size of a room containing kitchen facilities is 12sqm. This excludes bathroom facilities. The proposed new build PBSA studio sizes are 20sqm, and 21 sqm for the wheelchair adaptable/accessible units. In the converted Clerkenwell building the studio sizes would range between 18.1sqm - 29.8sqm. These exceed the minimum HMO standards.

Room Function Comfort and Efficiency

9.347 Local Plan Policy H4 Part D (iii) requires the provision of rooms which are designed to function comfortably and efficiently for their intended purpose. This requirement is also reinforced in the Purpose Built Student Accommodation London Plan Guidance (PBSA LPG), which stresses the importance of ensuring a quality of accommodation broadly comparable to the wider neighbourhood. The LPG indicates that bedroom sizes should recognise that student bedspaces are also spaces for study, storage and private socialising.

9.348 The new build studios include en-suite toilet and shower room, kitchenette, bed, wardrobe, and a table or desk. The wheelchair accessible studios in the new building appear to have a smaller wardrobe and a single/queen size bed. In the converted building the studios make the same provision, however the layouts are more constrained e.g. beds only accessed from one side. Some of the rooms which have a table instead of a desk would provide private socialising space, however for other rooms this would be extremely limited.

Communal space

9.349 In addition to the requirement in Policy H6 B(i) for the provision of communal space, the LPG also notes that 'the building as a whole should provide for different student needs such as study, relaxation, socialising, retreat, privacy, exercise, laundry support and worship'.

9.350 In terms of communal amenity space, there is space provided internally for lounge, communal dining, cinema and fitness, as well as other amenity spaces which don't appear to have a defined function. There doesn't appear to be any provision of laundry facilities or communal kitchens, which would likely have negative impacts on amenity for students, as well as creating pressure on local businesses in the area. In addition, there is an external amenity space provided on the first floor of the student accommodation tower in the form of a balcony measuring approx. 57sqm. The submitted Design & Access Statement also includes the external Clerkenwell Square and the informal seating area between the Clerkenwell building and the northwest elevation of the Accommodation building as outdoor amenity space, however these are public spaces and should not be counted towards the provision of communal space for students.

9.351 The table below shows the different types of internal communal amenity floorspace proposed across the student accommodation tower, Clerkenwell building and student amenity building. The figures have been drawn from the Planning Statement and Viability Statement. The Planning Statement indicates that a total of 733sqm of amenity space would be provided, however this seems to exclude the amenity space in the basement of the student tower which would be an additional 34sqm. The Viability Assessment does not appear to include the amenity space proposed on the ground floor of the Clerkenwell building. The Design and Access Statement provides a different range of floorspace figures for amenity space, measured as 'Net Sales Area' which are lower than the GIA measurements.

9.352 The lack of consistency and clarity regarding the quantum of student amenity space is concerning. The Design and Access Statement details that the internal student amenity space in the two new buildings and Clerkenwell wing amount to approx. 2sqm per student, with external amenity space adding a further 1-1.5sqm per student. The Viability Assessment states that 'the current provision of 2.85sqm per bed is in line with a market standard of 2-4sqm per bed.' However, the figures in the table below amount to approx. 3sqm per student of internal communal amenity space.

Location	Floorspace (GIA)	Proposed Use
Student accommodation tower basement	34sqm	Cinema and Fitness
Student accommodation tower 1st floor	187sqm	Communal dining or lounge
Student accommodation tower 23rd floor	307sqm	Communal dining and lounge
Student amenity building 1st floor	104sqm	Flexible student amenity space ('town hall')
Clerkenwell building ground floor	135sqm	Student amenity space
Total	**767sqm**	

9.353 There is a lack of clarity on the specific functions of the student amenity spaces, particularly on the ground floor of the Clerkenwell building, and the first floor of the student amenity building. The need for these spaces has not been justified. There is potential for some of this space to be earmarked for other uses, particularly given the requirement in the site allocation to provide active frontages and commercial and social and community infrastructure uses. The inclusion of uses such as cinema and fitness, and the lack of basic functions such as laundry facilities is questioned. Overall, it is considered that the quantum of communal amenity space is excessive.

9.354 No justification has been provided for the amenity space on the top floor of the student accommodation tower being double height. Given that this contributes to the excessive height of the proposed tall building, it is questioned.

Recycling and Waste

9.355 Local Plan Policy H4 Part D (ii) requires that appropriate consideration is given to how recycling and waste arising from the occupation of the development will be stored, collected and managed.

9.356 The Student Accommodation tower and amenity building are served by a bin store located in the basement of the tower. Refuse for the commercial unit at the base of the Student Accommodation building will be combined with this. The Clerkenwell building has a bin store on the ground floor. The collection point would be located at the north of the Clerkenwell building, adjacent to a lay-by designated for service vehicle use, and this will be within a 10m drag distance.

High Levels of Amenity

9.357 Local Plan Policy H4 Part K requires proposals to prevent or mitigate noise impacts on and between dwellings. The Design & Access Statement details that adverse noise and vibration impacts arising from the site's proximity to a busy road would be mitigated by the windows not being openable.

9.358 Local Plan Policy H6 Part B(i) requires the provision of good levels of daylight and sunlight and natural ventilation.

9.359 The PBSA LPG also reinforces this principle: para 2.6.2 'As well as sensible layouts of different bedroom-based amenities there are some wider considerations. These include ensuring good standards of sound-proofing, daylight and natural ventilation in private and communal spaces, where possible achieving dual-aspect shared living rooms or at least a reasonable exterior outlook. '

9.360 The Daylight and Sunlight report indicates that 100% of studios in the student accommodation tower comply with BRE daylight recommendations, however in the Clerkenwell building, only 31% of studios are compliant, which weighs against the scheme.

9.361 In terms of natural ventilation, the windows in the Student Accommodation tower do not open. The Design & Access Statement details that this is due to limiting noise impacts and ensuring safety. Mechanical ventilation is provided in the studios. It is also proposed that a ventilation panel behind a weathered louvre is included at low-level as part of the fixed window system, which can be opened by students in the warmer months.

Accessible student accommodation

9.362 Local Plan Policy H6 Part B (ii) requires 5% bedspaces to be easily adaptable for wheelchair users. The Inclusive Design SPD requires 10% of bedrooms to be wheelchair accessible. While the proposed scheme meets this requirement, there are concerns about the location of the units within the building which is discussed in more detail in the Accessibility and Inclusive Design section of the report.

Site Management and Maintenance Plan

9.363 Local Plan Policy H6 Part B (iii) requires applicants to ensure the provision of an appropriate site management and maintenance plan. Para 3.98 sets out what this should include. It notes that this should be submitted at the earliest stage, ideally at pre-application. No site management and maintenance plan has been submitted with the application to satisfy this policy requirement. This needs to be addressed.

Nomination Rights

9.364 Local Plan Policy H6 Part B (iv) requires nomination rights, prioritising local higher education institutions. This is also a requirement of London Plan policy H15 A. The applicant's Student Accommodation Demand Assessment states that 'At this junction we have not explored potential interest for the site from universities in London but believe it would be of interest to a number of parties.'

9.365 However, the application provides some evidence of demand for student accommodation as follows: 'There are over 30 schemes within the borough, totalling c.10,000 student beds. Given that there are c.164,000 full-time students within a 30-minute catchment and c.30,000 full-time students within the borough, it is clear that the existing supply is insufficient to fulfil the needs of students. Based on the statistics listed above, there are at least c.20,000 full time student living at home or within the private rented sector (e.g HMO's).'

9.366 The information provided is not considered sufficient to satisfy the policy requirements. The use of the accommodation can only be for higher education students, and this would need to be confirmed through a binding nomination agreement provided to the council between the student

accommodation provider and relevant university or universities. Higher Education Institutions that are local to the development are prioritised. A s106 agreement would then confirm the nomination agreement and its operation over the lifetime of the development.

9.367 Given this, the proposal is contrary to Local Plan Policy H6.

Temporary uses

9.368 Local Plan Policy H6 Part B (v) requires that any other temporary use of student accommodation must be secured by legal agreement to ensure that the potential impacts on the safety, security and privacy of both resident students and wider amenity impacts are managed. The potential cumulative impact on housing supply will be considered and anyu temporary use must be demonstrated to be ancillary.

9.369 No details have been set out by the applicant in the supporting material as to any intended temporary use. However, the Design & Access Statement indicates how the layout of the upper floors, which are proposed for student accommodation, could potentially be adapted for different uses such as office, PBSA with clustered beds and general needs housing.

9.370 Given a clear temporary use has not been indicated, and the applicant has not sought to agree this as part of the submission or discussions relating to a legal agreement, it is considered that temporary uses are not being sought.

9.371 However, should this not be the case, the Local Planning Authority would reserve the right to consider this though the appropriate process and ensuring that relevant planning policy is met.

Affordable Student Accommodation

9.372 As detailed earlier in this report, Local Plan Policy H6 Part B (vi) sets out the requirement to provide at least 35% affordable student accommodation in line with London Plan Policy H15. Contrary to policy requirements the proposal does not include affordable student accommodation.

9.373 Mixed and Inclusive Neighbourhood

9.374 Policy H6 Part B (vii) requires applicants to ensure the development contributes to a mixed and inclusive neighbourhood. Further guidance is provided in the PBSA LPG on how to assess this criterion is met:

- **Locating in well-connected, well-served areas**: The proposal is located within Archway Town Centre, in a high PTAL area.

- **Concentration and dominance of uses** – There is no provision of other PBSA within the immediate proximity of the site. However, there is extensive provision of student accommodation within the borough. The Site Allocation, seeks residential-led development where an **element** of student accommodation is acceptable if it does not outweigh or undermine the provision of genuinely affordable housing. For the reasons noted earlier in this report, it has not ben demonstrated that the delivery of student accommodation would not weigh against the delivery of conventional housing, inclusive of affordable house. Given this, and that the proposal would introduce a significant quantum of student accommodation, representing approximately one third of this major development, its considered that insufficient justification has been submitted to demonstrate that this would not represent an unacceptable concentration and dominance of a student use to the area.

- **Integrating with the neighbourhood**: The PBSA LPG suggests that this can be achieved through 'incorporating publicly accessible uses (such as shops and services, open space, and community facilities such as gyms and meeting space) within the development', providing 'other employment space, such as offices, shared workspace or workshops (including affordable workspace)', or incorporating 'satellite university teaching, research or library provision'. Paragraph 2.4.5 of the PBSA LPG indicates that 'a borough's Local Plan policies and wider spatial strategy, and site-specific circumstances, will remain relevant considerations – including whether a site falls within town centre or CAZ boundaries.' The proposed PBSA buildings incorporate only a small element of commercial use (28sqm), comprising a café located on the ground floor of the Student Accommodation tower. However, there is a lack of clarity on the use of this space and whether it would be publicly accessible, as highlighted previously in the 'Commercial uses' section. The cluster of student buildings on site would have very limited interaction with the rest of the site and the wider neighbourhood and would not provide active and engaging ground floor uses for

the wider public. The provision of private amenities such as a cinema and gym only for the use of students would not contribute to a mixed and inclusive neighbourhood, while the lack of essential facilities such as laundry provision for students could potentially have an impact on this type of service locally.

Quality of residential Accommodation Conclusions

9.375 By reason of the insufficient levels of daylight receipt in the proposed student accommodation within the Clerkenwell Building, that a management and maintenance plan relating to the student provision has not been submitted, the failure to demonstrate through a binding nominations agreement that the accommodation will only be occupied by students of one or more higher education providers, the lack of detail to demonstrate that the student accommodation would provide a mixed and inclusive neighbourhood nor that it would not result in an over concentration of an inappropriate use, it is considered that the proposed student accommodation would be contrary to Local Plan Policy H5 and London Plan Policy H15.

ACCESSIBILITY AND INCLUSIVE DESIGN

Accessibility and Inclusive Design - Policy Context

9.376 Paragraph 135 (f) of the National Planning Policy Framework (December 2024) states that planning decisions should create places that are safe, inclusive and accessible.

9.377 Policy GG1 of the London Plan 2021 requires that development must support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides. Further, it supports and promote the creation of an inclusive London where all Londoners can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

9.378 The Inclusive Design principles are set out within policy D5 of the London Plan which states that development proposals should achieve the highest standards of accessible and inclusive design. It should:

- be designed taking into account London's diverse population;
- provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
- be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;

1. be able to be entered, used and exited safely, easily and with dignity for all 5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

9.379 Policy PLAN1 requires development to be: 'Inclusive – development must be adaptable, functional and resilient, and able to respond to the spatial, social and economic needs of the borough's increasingly diverse communities and their different and evolving demands. This includes sustaining and reinforcing a variety and mix of uses in line with any relevant land use priorities of the Local Plan'.

9.380 The Council's Inclusive Design SPD further sets out detailed guidelines for the appropriate design and layout of existing and proposed new buildings.

Accessibility and Inclusive Design Assessment

<u>Accessible and Adaptable Homes</u>

9.381 Local Plan Policy H4 Part B states that housing must be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development and must provide 90% of dwellings to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard, reflecting the similar requirements set out in London Plan Policy D7. The policy requires that the 10% of wheelchair accessible housing are provided as a total of housing quantum and across tenures. For the proposed development, this equates to 18 homes and while emphasis is placed on increased social rent provision private units are also required.

9.382 In terms of the affordable provision, a total of 10 units (10.99%) of the 91 proposed affordable dwellings would be homes for wheelchair users designed in accordance with M4(3). The remaining affordable dwellings would be designed as 'accessible and adaptable' to M4(2) - a wheelchair turning circle would be accommodated at the entrance areas and within the living and dining rooms, and the bathrooms would accommodate a wheelchair and allow future adaptation with grab rails. The homes for wheelchair users would comprise of 4no one-bedroom two-person units in Block A and 6no. two-bedroom four-person units in Block B. There would be no homes for wheelchair users provided in Block C, despite the block's more convenient location towards the bottom of the slope within the site.

9.383 In addition, the proposed affordable wheelchair provision includes no family units. Islington has evidence of an extremely high demand for family sized wheelchair homes and the proposed one-bedroom and two-bedroom provision in Blocks A and B would not align with the Council's requirements in terms of actual demand.

9.384 No details of accessible housing have been provided by the applicant in relation to the 87 private market housing units. It is noted that multiple units detailed on the proposed layout plans have potential to be M4(3) compliant with regard to overall unit size, no specification or mention of accessible housing provision is indicated. By not providing sufficient details of wheelchair homes in the market housing the proposal fails to demonstrate that the scheme would provide 10% of M4(3) wheelchair accessible housing as a total housing quantum and across tenures in accordance with policy.

9.385 The proposed development fails to demonstrate that it would result in inclusive, accessible buildings, which meet the needs of intended occupiers and visitors. It is therefore considered to be contrary to Local Plan Policy H4 in terms of the provision of wheelchair homes and this weighs negatively against the proposal in the planning balance.

Student Accommodation

9.386 Local Plan Policy H6 Part B(i) states that proposals for general needs student accommodation units must be designed to be 'visitable' and shared facilities must be accessible. Part B(ii) states that proposals should ensure that 5% of bedspaces, their associated bathrooms and all common parts are easily adaptable for occupation by wheelchair users. The supporting policy text at paragraph 3.97 sets out that a wheelchair accessible toilet must be provided on every floor. Buildings must also be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access.

9.387 The proposed tower would provide 210 student studio bedrooms, arranged with standardised layout of 10 studios per floor level, with one of the units with a larger footprint allocated for wheelchair users. The applicant sets out that 21 (i.e. 10%) of the proposed units will be studios for wheelchair users designed in accordance with M4(3). The applicant states in the Design and Access statement that appropriate spatial standards, including turning circles and clearances, will be accommodated.

9.388 While the level of wheelchair accessible studio provision is considered to be acceptable in terms of the overall quantum of student accommodation, the Inclusive Design Officer has raised concerns that wheelchair units located above the fifth floor of the tower would not be supported due to the need to secure safe evacuation routes. This represents a fundamental problem with proposed internal layout of the student accommodation in the tower.

9.389 A further 32 student bedrooms would be provided in the Clerkenwell building, with a lobby, bin store and communal amenity space at ground floor level and 8 student studio bedrooms arranged per level over the first to fourth floors. The layout of the units is generally considered to be acceptable however, the Inclusive Design Officer has advised that the ground floor amenity space requires an accessible toilet.

9.390 The proposal, therefore, fails to demonstrate that it would result in inclusive, accessible buildings, which meet the needs of intended occupiers and visitors in accordance with policy. This

Public Realm Strategy

9.391 The applicant sets out in their Landscape Statement that all-inclusive access has been a guiding principle of the design of the landscape and public realm across the site to ensure it can be accessed and used by all. The solid linework in the diagram below sets out the step free strategy to the entrances to different buildings across the site. This would include 2 platform lifts (shown in red), which would enable users to access the entrances to Block C and the Holborn building when accessing from the north. The dashed lines indicate movement where stepped access is required.

9.392 Seating would be provided throughout the design to allow people to pause and rest, as well as to give people options for how they occupy the site. Seating areas are shown in blue on the diagram below. The applicant sets out that the seating will have backrests and armrests across 50% of the seating and that all steps will have handrails. Corduroy paving and contrast strips to risers and treads would form part of the design of the landscape and public realm.



Figure 70: Proposed public realm accessibility strategy.

9.393 The Inclusive Design Officer has advised that the general urban design principles presented in the submission are supported, advocating for improving the site's permeability and significantly improving the quality of the public realm. It is noted that the proposal aims to create good quality public spaces as well as peaceful and semi-private realm for the residents, delineated yet not fully separated under the proposed north-south level change solution.

9.394 The Inclusive Design Officer has advised that this strategy is supported as it maintains residents' privacy. However, while the strategy achieves good connectivity for stepped connections, the step-free routes have not been considered to the same extent. London Plan Policy D5 requires no separation or special treatment of disabled people.

9.395 Contrary to London Plan Policy D5 the proposal fails to adopt legible and convenient north-south and east-west step-free links, which avoid separation of routes introducing significantly longer distances or other 'special treatment' for people for whom steps introduce a barrier, including people with reduced mobility. The stepped connection leading northwards towards Block C, in particular, provides no level/ramped routes, extending the step-free route significantly by forcing reduced mobility users to travel along Highgate Hill, away from the clear north-south desire line along the central spine.

9.396 For Block A, the entire step-free access strategy for residents and visitors with reduced mobility relies on the use of lifts. This is not an acceptable access strategy approach, particularly as Block A would include 4 of the proposed dedicated affordable wheelchair homes. At Block C, the length of the proposed access ramp fails to provide the required landings every 10m.

9.397 As a result, the current design of the proposal fails to achieve a satisfactory quality of step-free circulation, in accordance with London Plan Policies D5, Local Plan Policies PLAN1, G3, T1 and SP7, and the Inclusive Landscape Design Guide SPD. This weighs negatively against the scheme in the planning balance.

Children's Play Space – Inclusive Design Considerations

9.398 London Plan Policy S4 Part B states that development proposals for schemes that are likely to be used by children and young people should:

1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile.

2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that: provides a stimulating environment can be accessed safely from the street by children and young people independently.

9.399 Paragraphs 5.4.3 and 5.4.4 of the supporting policy text state that:

"Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating, and should balance the need to be safe whilst also providing an element of risk, which is important for children's development. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security.

There should be appropriate provision for different age groups, including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm."

9.400 Local Plan Policy SC2 Part C states:

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

9.401 Paragraph 3.153 of the supporting policy text states:

"Play provision must be inclusive and suitable for children and young people of all abilities, employing the principles of inclusive play. Increased physical activity contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction. In order to facilitate greater physical activity, it is important that children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision."

9.402 Paragraph 3.153 of the supporting policy text states:

"Where formal play space is provided it must be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space."

9.403 Islington's Landscape Design Guide SPD sets out the following inclusive play objectives:

- To produce play opportunities that are inclusive and celebrate diversity
- To produce environments that promote free play

9.404 The SPD also sets out the following design considerations

- To engage all the senses
- To present physical and sensory challenges whilst managing appropriate risks.

9.405 To take into account the interests of all children, parents and carers including those who are disabled.'

9.406 The SPD goes on to state that "Islington's own Play Strategy sets out three overarching principles: to develop the provision of good inclusive and accessible play; to reduce barriers to free play; and to involve children and young people in the planning and management of play projects."

9.407 A children's play space is proposed to the west of Charterhouse with the southern and western edges of the play area are formed by a railing and the main entrance to the play space is marked by a gateway feature on the southwest corner of the space.

9.408 The Inclusive Design Officer has raised concerns with regards to the close proximity of the proposed playground to the Charterhouse Way servicing road which is to facilitate through traffic, including servicing and delivery vehicles. The main concern relates to children running out onto the road due to the location of the playground gate. Holborn Avenue, the central north to south spine through the centre of the site would also accommodate refuse vehicles, although it is noted that this would be infrequently. Children living in the residential accommodation to the south of the Charterhouse Way, including Block B, Block C, Holborn Union and Admin building, would be required to cross the servicing road to access the playground.



Figure 71: Proposed playground

NEIGHBOURING AMENITY

Policy Context

9.409 Chapter 12 of the NPPF details that new development should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. With specific regard to daylight and sunlight, the NPPF states that 'when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to

daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)'.

9.410 London Plan Policy D1 states that development design should deliver appropriate outlook, privacy and amenity. London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight for new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor space. London Plan Policy D13 seeks to reduce, manage and mitigate noise to improve health and quality of life.

9.411 London Plan Policy D3 Part D states that development proposals should deliver appropriate outlook, privacy and amenity, the design of the development should also help prevent or mitigate the impacts of noise and poor air quality.

9.412 Local Plan Policy PLAN1 Part B(i) requires that developments provide a good level of amenity, including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution (such as air, light and noise), fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook.

9.413 Local Plan Policy DH5 states that any potential adverse impacts which may arise due to new development being located close to sensitive uses must be fully prevented via the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact. In terms of noise and vibration the policy requires that all development proposals which have the potential to cause or exacerbate unacceptable noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts.

Neighbouring Amenity Assessment

9.414 The southern apex of the site borders Archway Town Centre and the intensive commercial activity associated with Navigator Square, Junction Road and Holloway Road. However, travelling northwest along Highgate Hill, following the mature tree lined flank of the western boundary of the site, the prevailing urban context begins to change and becomes more residential in character.

9.415 The closest neighbouring residential properties bound the site to the north, including terraced housing on Lidyard Road, flats at The Academy - a complex of converted former school buildings, including The Cottage (the former care takers' cottage) and The Barn (a converted former outbuilding) - on Highgate Hill and flats at Whitehall Mansions, which lies on the junction of Lidyard Road and Archway Road. There are residential properties located to the west of the site on the opposite side of Highgate Hill at the Girdlestone Estate, including Magdala Avenue, Salisbury Walk and Annesley Walk. Archway Heights, a nine-storey residential block, is located to the east of the site on the opposite side of Archway Road with the six storey blocks of flats at Pauntly Street located just behind. Beyond Archway Park to the east lies the Miranda Estate, including a four storey terrace of flats at Henfield Close.

<u>Overlooking</u>

9.416 The supporting text for Local Plan Policy PLAN1 states that a minimum distance of 18 metres between windows of habitable rooms should be maintained to protect the privacy of residential properties. This does not apply across the public highway, overlooking across a public highway does not constitute an unacceptable loss of privacy'.

9.417 In the application of this guidance, consideration has to be given to the nature of views between windows of the development and neighbouring habitable rooms. For instance, where the views between habitable rooms are oblique as a result of angles or height difference between windows, there may be no or little harm.

9.418 The neighbouring properties that are not separated from the site by a road are located to the north at Lidyard Road, The Academy (including The Cottage and The Barn) and Whitehall Mansions. The main impact in terms of overlooking would relate to the seven storey Block A, located at the northern edge of the site.



Figure 72: Cross section of Block A in relation to the Academy (left)

9.419 The proposed position of Block A would result in the following separation distances between windows of habitable rooms at:

- The Cottage: 16.7m to the flank elevation containing a lower ground floor living room window. The proposal fails to demonstrate a minimum distance of 18 metres would be maintained between windows of habitable rooms. However, given the oblique angle between the buildings, the sunken position of the lower ground window at the Cottage and the positioning of the windows in Block A, it is not considered that in this instance the amenity of the property would be unduly affected by overlooking and a loss of privacy.

- The Academy: Approximately 17m from the southern flank elevation containing up to five bedroom windows. The proposal fails to demonstrate that a minimum distance of 18 metres would be maintained between windows of habitable rooms. However, the area between the buildings comprises a paved communal car parking area for The Academy residents, rather than private gardens. While there would inevitably be an element of mutual-overlooking, given that many of these windows are secondary, some are constrained by an external staircase and that a 17m distance would be maintained over a communal car park, this separation is considered to be reasonable in this instance given the specific site circumstances and would not result in an undue overlooking or a loss of privacy.

- The Barn: 10.9m to a ground floor bedroom window in the southern flank elevation and two roof lights serving a living room/ kitchen dining area. The proposal fails to demonstrate a minimum distance of 18 metres would be maintained between windows of habitable rooms. However, the impact would be reduced given the difference in ground level and the retention of the northern site boundary wall, meaning the bedroom window at The Barn would not be directly overlooked at a horizontal angle as the heights of the opposing floor levels would be staggered. Windows at the first floor of Block A would be screened by the retained boundary wall and the windows at the upper floor levels of Block A would be considerably higher preventing a direct line of sight into the bedroom. The roof lights are positioned at an angle on the roof slope preventing a direct line of sight into the property. It is acknowledged that given the close proximity of Block A an element of overlooking and loss of privacy to this property would be unavoidable, but in this instance, it is not considered that the impact would be to an unduly harmful extent given the specific site circumstances.

- 17, 19 and 21 Lidyard Road: Approximately 16.7m at the closest point from first floor bedroom windows. The proposal fails to demonstrate a minimum distance of 18 metres would be maintained between windows of habitable rooms. However, given the oblique angle between the buildings and the positioning of the windows in the Lidyard Road houses and Block A, it is not considered that in this instance the amenity of the properties would be unduly affected by overlooking and a loss of privacy.

9.420 A number of objections have been received citing concerns with regard to overlooking and a loss of privacy. While it is acknowledged that the proposal would result in an element of limited overlooking to some of the neighbouring properties, it is considered that in this instance the impact on the amenity

of the neighbouring properties to the north would not be to an unduly harmful extent given the specific site circumstances and the reasons set out above.

Outlook and sense of enclosure

9.421 The impact of a development on outlook can be considered a material planning consideration if there is an undue sense of enclosure for neighbouring residential properties. There are no established guidelines for what is acceptable or unacceptable in this regard, with any assessment subjective as opposed to empirical with key factors in this assessment being the local context and arrangement of buildings and uses.

9.422 The visual amenity afforded to accommodation from a dwelling's immediate surroundings, as experienced from its windows or outdoor spaces can be adversely affected by the close siting of another building or structure, which – depending on its proximity, size and appearance – can create an oppressive, increased sense of enclosure to the detriment of the amenities of a neighbouring property. This applies in particular to single aspect dwellings, or those that already have limited outlook.

9.423 The neighbouring properties that would be most vulnerable to a loss of outlook and a sense of enclosure are those located immediately to the north of the site at Lidyard Road, The Academy (including The Cottage and The Barn). The main impact in terms of outlook and a sense of enclosure would relate to the proposed location and scale, bulk and massing of Block A.

9.424 The proposal would involve the demolition of the existing Furnival Building and single storey Staples building to accommodate the construction of Block A, effectively bringing the comparative height and scale of the existing Furnival building closer to the northern site boundary.

9.425 Given the change in ground level between the northern part of the site and the adjacent residential properties at the Academy, Block A would read as six storey building from the adjacent residential properties to the north. It is acknowledged that the scale and height of Block A in comparison to the neighbouring residential buildings at The Cottage and The Barn and terraced houses at Lidyard Road would be significantly larger, and the presence of a building of the proposed scale would inevitably result in some loss of outlook. However, these neighbouring properties do not have a direct aspect towards Block A and the main aspect from The Academy is to the east and west rather than south towards Block A. While there are windows present in the south flank elevation of The Academy, these are primarily bedroom windows and secondary windows. The eastern section of Block A has also been successfully designed to step down to by one storey in height to lessen any undue impact on the occupiers at Lidyard Road.

9.426 Given the proposed design of Block A, the distance between the neighbouring buildings and the specific site circumstances, it is not considered in this instance that the loss of outlook for neighbouring properties due to Block A would be to an unduly harmful extent.

Noise and Disturbance

9.427 Local Plan policy DH5 states that all development proposals which have the potential to cause or exacerbate unacceptable noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts. Where noise and/or vibration impacts are identified suitable mitigation measures must be put in place to reduce these impacts to acceptable levels.

9.428 The southern apex of the site borders Archway Town Centre and the intensive commercial activity associated with Navigator Square, Junction Road and Holloway Road. However, travelling northwest up Highgate Hill, following the mature tree lined flank of the western boundary of the site, the prevailing urban context begins to change and becomes more residential in character.

9.429 The site is within a relatively dense urban area with two busy main roads and junctions and Whittington Hospital to the west. While the western, southern and eastern flanks of the site are buffered from neighbouring residential estates by the adjacent road network, the northern boundary to the site directly adjoins the rear gardens of residential properties at Lidyard Road, the Academy and Whitehall Mansions.

9.430 The student accommodation elements of the scheme would be located a the southern apex of the site, in close proximity of the town centre and away from the directly adjoining neighbouring properties to the north, limiting any potential noise and disturbance. In the event of an approval the submission of a student management plan would be required by condition.

9.431 The site has not been in use for over 10 years, and up until 2013 it was in use as a university teaching hospital. The previous use would have carried with it an element of activity during early morning, evening, night and weekend hours and would have the potential to cause noise and disturbance to the neighbouring residents. The proposal would see the introduction of 178 new residential dwellings and a further 242 student accommodation studios, bringing a significant uplift in the number of people living in close proximity and associated activities.

9.432 However, the student accommodation elements of the scheme would be located a the southern apex of the site, in close proximity of the town centre and away from the directly adjoining neighbouring properties to the north.

9.433 Given the site's previous use and the site's urban context it is not considered that introduction of the conventional residential use would have an adverse impact on the amenity of surrounding residents from its typical use.

Demolition and Construction Impacts

9.434 The proposed construction works would inevitably have some impact to the local area during the construction period.

9.435 Should the application be recommended for approval, a detailed Construction and Environmental Management Plan would be required by condition to be submitted to and agreed in writing by the Council prior to any construction work commencing on site.

9.436 Furthermore, a legal obligation would be required to ensure that the applicant would cover any cost to repair any damages to the public footway/carriageway caused by the development. This would be secured under section 106 agreement with a figure confirmed.

Light Pollution

9.437 The details submitted in support of the application reference the installation of a new lighting scheme. However, no details of this have been provided. To ensure that any lighting did not detrimentally impact upon neighbouring amenity, should the application be recommended for approval a condition would be recommended requiring details of a lighting plan to be submitted.

Daylight, Sunlight, and Overshadowing

9.438 Policy D9 of the London Plan outlines that the impact of a development upon daylight and sunlight penetration should be carefully considered and not compromise comfort and the enjoyment of open spaces around the building.

9.439 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment ('BRE') document 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.

9.440 The starting point must be an assessment against the BRE guidelines and from there a real understanding of impacts can be understood. Knowing very clearly what the actual impacts are in the first instance is consistent with the judgement made in 'Rainbird vs Tower Hamlets [2018]'.

9.441 Once the transgressions against the BRE guidelines are highlighted, consideration of other matters can take place.

9.442 The 'Effective Use of Land' section in the Government's Planning Practice Guidance (PPG), confirms that consideration is to be given as to whether a proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, setting out that all development should maintain acceptable living standards, although what will be appropriate will depend to some extent on the context. The Guidance cites city centre locations where tall modern buildings predominate as an area where lower daylight levels at some windows may be appropriate if new development is to be in keeping with the general form of its surroundings.

9.443 Whilst BRE guidelines are intended for use in adjoining dwellings, paragraph 2.2.2 (of the BRE guidelines) confirms that they may also be applied to existing non-domestic buildings (such as schools, hospitals, hotels and hostels, small workshops, and some offices) where occupants have a reasonable expectation of daylight.

Daylight Guidance

9.444 The BRE Guidelines (2022) stipulate at 2.2.23 that… "the diffuse daylighting of the existing building may be adversely affected if either:

9.445 the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value.

9.446 the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value." (No Sky Line / Daylight Distribution)."

9.447 At paragraph 2.2.7 of the BRE Guidelines it states: "If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times is former value, occupants of the existing building will notice the reduction in the amount of skylight. The area of lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."

9.448 At paragraph 2.2.10 of the BRE Guidelines state: "Where room layouts are known, the impact on the daylighting distribution in the existing building can be found by plotting the 'no sky line' in each of the main rooms. For houses this would include living rooms, dining rooms and kitchens. Bedrooms should also be analysed although they are less important… The no sky line divides points on the working plane which can and cannot see the sky… Areas beyond the no sky line, since they receive no direct daylight, usually look dark and gloomy compared with the rest of the room, however bright it is outside".

9.449 Paragraph 2.2.13 states: "Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight." The paragraph goes on to recommend the testing of VSC with and without the balconies in place to test if it the development or the balcony itself causing the most significant impact.

9.450 The BRE Guidelines at its Appendix F gives provisions to set alternative target values for access to skylight and sunlight. It sets out that the numerical targets widely given are purely advisory and different targets may be used based on the special requirements of the proposed development or its location. An example given is "in a mews development within a historic city centre where a typical obstruction angle from ground floor window level might be close to 40 degrees. This would correspond to a VSC of 18% which could be used as a target value for development in that street if new development is to match the existing layout".

9.451 The BRE Guidelines at Appendix F gives provisions to set alternative target values for access to skylight and sunlight. It sets out that the numerical targets widely given are purely advisory and different targets may be used based on the special requirements of the proposed development or its location.

Sunlight Guidance

9.452 The BRE Guidelines (2022) state in relation to sunlight at paragraph 3.2.13: "If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:

9.453 Receives less than 25% of annual probable sunlight hours, or less than 5% of winter probable sunlight hours between 21 September and 21 March and;

9.454 Receives less than 0.8 times its former sunlight hours during either period and;

9.455 Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours."

9.456 The BRE Guidelines) state at paragraph 3.1.6 in relation to orientation: "A south-facing window will, receive most sunlight, while a north-facing one will only receive it on a handful of occasions (early morning and late evening in summer). East and west-facing windows will receive sunlight only at certain times of the day. A dwelling with no main window wall within 90 degrees of due south is likely to be perceived as insufficiently sunlit."

9.457 The guidelines go on to state at paragraph 3.2.3: "…it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except for bedrooms that also comprise a living space, for example a bed sitting room in an old people's home".

9.458 Where these guidelines are exceeded then sunlighting and/or daylighting may be adversely affected. The BRE Guidelines provide numerical guidelines, the document though emphasises that advice given is not mandatory and the guide should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.

Overshadowing Guidance

9.459 The BRE Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains.

9.460 At paragraph 3.3.17, the BRE guidelines state: "It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March."

Without overhangs/balconies

9.461 The BRE recognises that existing architectural features on neighbouring properties such as balconies and overhangs inherently restrict the quantum of skylight to a window. The BRE guidelines state that "Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even the modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and the area receiving direct skylight, for both the existing and proposed situations, without the balcony in place".

9.462 The applicant has undertaken a 'without overhang/balconies' assessment having identified where necessary and is considered further below within the assessment by Officers.

<u>Assessment of daylight, sunlight and overshadowing</u>

9.463 The applicant submitted a Daylight and Sunlight report prepared by Point2 Surveyors Limited, dated June 2024. The report considers the impacts of the proposed development on the residential neighbours in accordance with the 2022 Building Research Establishment (BRE) guidelines.

9.464 The axonometric view below shows the proposed development in situ and its relationship with the existing built-form and dwellings in the surrounding area.



Figure 74: Axonometric view of proposed development and surrounding properties

9.465 Due to their proximity to the development site the following surrounding buildings with residential accommodation have been assessed in terms of the effects of the proposed development upon their daylight and sunlight amenity:

- 1-48 Salisbury Walk
- The Whittington Stone Public House
- 1-24 Annesley Walk
- Archway Tavern Public House
- 1-25 Archway Heights
- Whitehall Mansions
- 1 to 25 (odd) Lidyard Road
- The Academy - Small Annex, Main Building & House
- 8 and 9 Flowers Mews
- 2 to 12 (even) Archway Close
- 31-105 Henfield Close

9.466 The image below shows the neighbouring residential receptors identified and tested within the Daylight and Sunlight Report.



Figure 75: The location of the neighbouring residential receptors identified and tested within the Daylight and Sunlight Report.

9.467 The following properties listed below are residential (and other sensitive) properties which have been demonstrated to pass the BRE guidelines with respect to “Vertical Sky Component” (VSC) and No-skyline” (NSL) testing.

- 1-48 Salisbury Walk
- The Whittington Stone Public House
- 1-25 Archway Heights
- Whitehall Mansions
- 8 and 9 Flowers Mews
- 31-105 Henfield Close

Sunlight

9.468 The assessment reports no transgressions in terms of sunlight, and all properties that have been assessed would maintain Annual Probable Sunlight Hours (APSH) within the BRE guidelines.

Daylight

1-24 Annesley Walk

9.469 Situated to the south-west of the site, this terrace of residential properties has a flank elevation facing the site with both the front and rear elevation facing the site at an oblique angle. The assessment sets out that the internal layouts have been assumed from external observation.

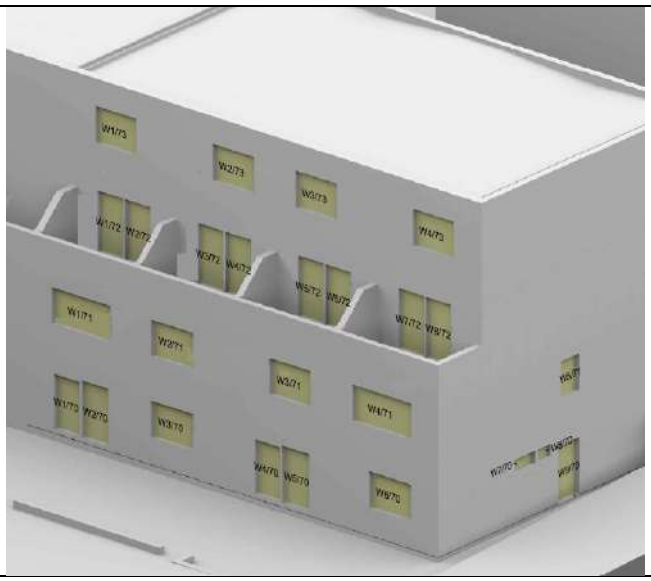


Figure 76: 1-24 Annesley Walk

1-24 Annesley Walk		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R5/70 W7/70		28.4	19.9	**30.1**	103.5	96.5	87.8	9.0
R5/70 W8/70		28.5	20.0	**29.8**				
R5/70 W9/70		27.8	19.6	**29.7**				
R5/71 W5/71		29.8	21.1	**29.1**	127.8	99.7	74.5	**25.3**
R4/72 W7/72		30.1	24.0	**20.3**	157.9	143.2	139.8	2.4
R4/73 W4/73		33.4	26.7	**20.2**	157.9	145.5	137.8	5.4

9.470 The results for 1-24 Annesley Walk indicate 6 VSC transgressions, with the worst affected VSC loss at 30.1% and a single NSL reduction of 25.3%. Internal floor layouts have not been provided, but from external observations the affected windows relate to W7/70, W8/70 a pair of high level narrow windows, W9/70 a door, W5/71 at first floor window, located on the flank elevation of the building. Windows W7/72, and W4/73 are a pair of full length balcony doors serving the first floor roof terrace. The transgressions are considered to be within the minor to moderate range, with acceptable levels of retained daylight.

Archway Tavern

9.471 Located to the south-east of the site, this public house is arranged over four floors with residential accommodation assumed to be on the upper two floors. The assessment sets out that the internal layouts have been assumed from external observation.

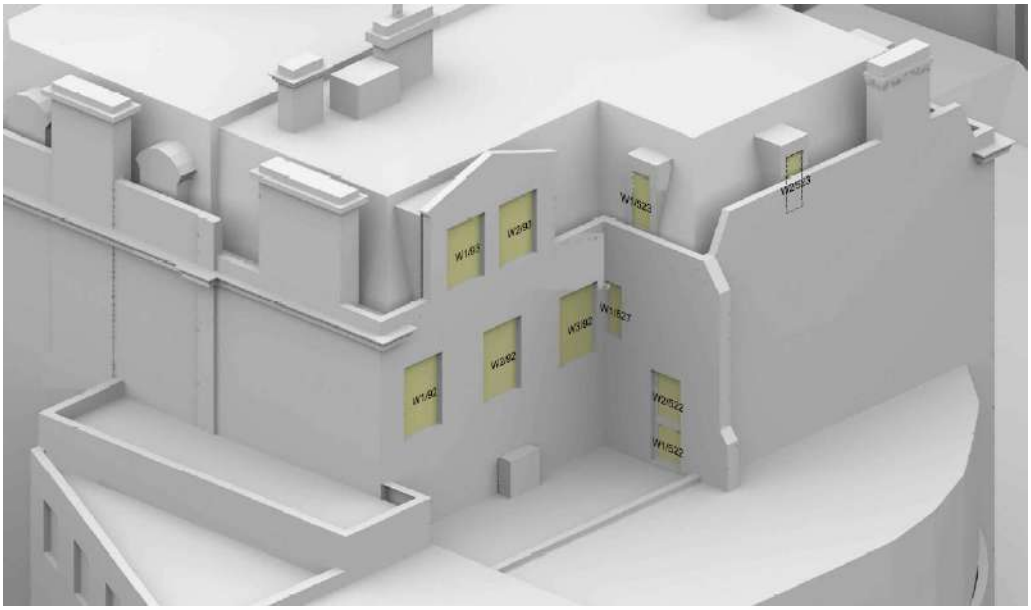


Figure 77: Archway Tavern

Archway Tavern		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R1/92 W1/92		34.0	26.6	**21.6**	199.7	196.8	196.8	0.0
R1/92 W2/92		32.5	25.2	**22.6**				
R2/92 W3/92		23.5	16.2	**31.2**	95.0	92.4	82.9	10.3
R1/93 W1/93		35.4	27.7	**21.7**	176.4	173.4	173.4	0.0
R1/93 W2/93		35.3	27.6	**21.7**				

9.472 The results for Archway Tavern indicate 5 VSC transgressions and but no NSL reductions beyond BRE guidelines. Internal floor layouts have not been provided, but from external observations the affected by VSC transgressions relate to W1/92, W2/92, and W3/92 at the third floor and W1/93, and W2/92 at the fourth floor. The transgressions are considered to be within the minor to moderate range.

1 to 25 (odd) Lidyard Road

9.473 Located to the north of the development, these thirteen terraced properties back onto the development site. The assessment sets out that the internal layouts have been assumed from external observation. Across the properties, 120 windows serving 78 rooms have been assessed.

9.474 The following properties would experience alterations of VSC & NSL (daylight) and W/APSH (Sunlight) within the BRE guidelines:

- 1 Lidyard Road
- 3 Lidyard Road
- 5 Lidyard Road
- 7 Lidyard Road
- Lidyard Road
- Lidyard Road
- Lidyard Road
- 15 Lidyard Road
- 17 Lidyard Road
- 21 Lidyard Road
- 23 Lidyard Road
- 25 Lidyard Road

19 Lidyard Road

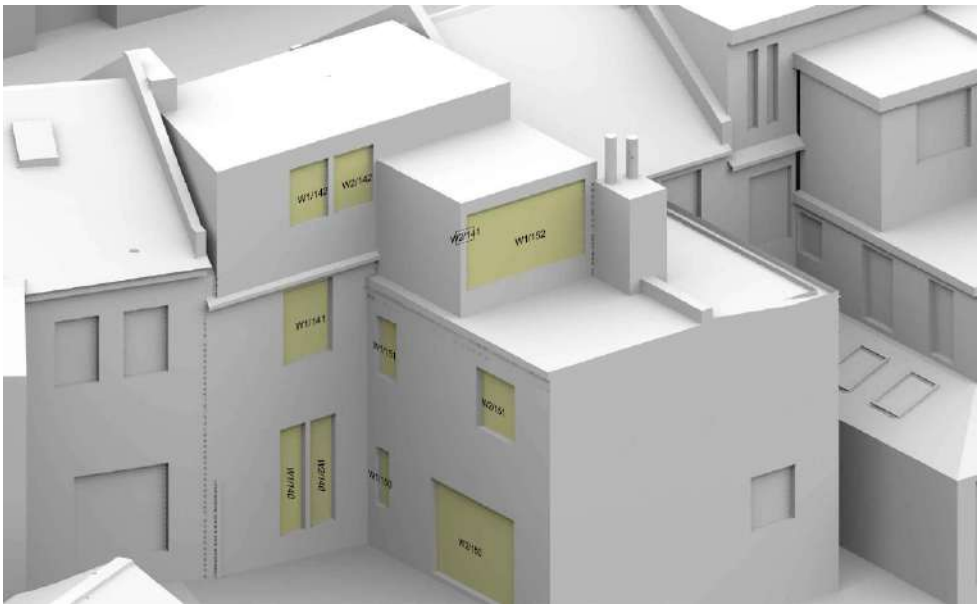


Figure 77: 19 Lidyard Road

19 Lidyard Road		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R1/140 W2/140		18.8	15.1	**20.0**	202.9	171.8	140.8	18.0

9.475 The results for 19 Lidyard Road indicate that there would be one marginal VSC transgression of 20% relating to W2/140 which serves a ground floor room. While this does represent a transgression, the level of reduction is considered to be marginally, only just representing a transgression, with the actual levels of reduction being minimal.

<u>The Academy (Small Annex)</u>

9.476 This property is situated to the north-west. Three windows associated with a bedroom and living rooms have been assessed.

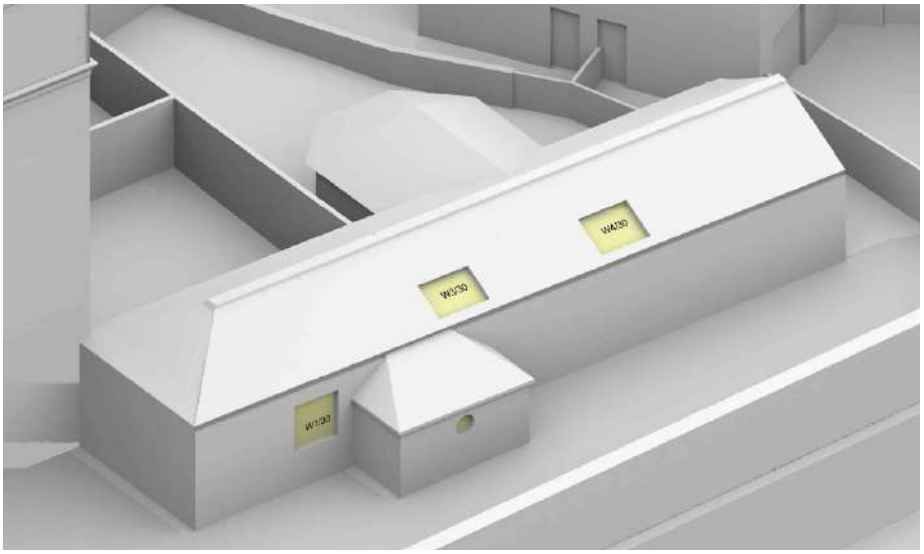


Figure 78: The Academy (Small Annex)

The Academy (Small Annex)		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R2/30 W1/30	BEDROOM	27.1	11.6	**57.2**	104.6	88.1	29.9	**66.1**
R3/30 W3/30	LIVING ROOM	74.4	59.3	**20.3**	247.0	246.2	246.2	0.0

9.477 The results for the Academy (Small Annex) indicate that both VSC and NSL transgressions would occur to ground floor bedroom R2/30. The 57.2% VSC and 66.1 NSL transgressions to the bedroom would be significant. While this weighs against the scheme in the planning balance, given this window serves a bedroom, which the BRE notes as not being as reliant on daylight, it is considered that this isolated instance would not be such that it would represent a reason for refusal. There would also be one marginal VSC transgression of 20.3% relating to W3/30 which serves a ground floor living room.

The Academy Main (Building)

9.478 Situated to the north-west, this three storey apartment building has a flank elevation facing the site. The report sets out that fifteen windows associated with eight rooms have been assessed.



Figure 79: The Academy (Main Building)

The Academy (Main Building)		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R2/1001 W2/1001	BEDROOM	30.7	20.1	**34.4**	133.4	117.7	72.0	**38.9**
R1/1003 W1/1003	BEDROOM	12.0	8.9	**25.6**	156.0	115.9	57.2	**50.6**
R1/1010 W3/1010	LKD	25.6	19.4	**24.3**	423.8	422.2	420.8	0.3
R1/1010 W4/1010	LKD	16.3	10.7	**34.2**				
R1/1011 W1/1011	STUDY	27.6	20.6	**25.4**	97.9	96.7	96.7	0.0
R2/1011 W2/1011	BEDROOM	10.1	6.0	**40.2**	133.8	88.4	32.2	**63.6**

9.479 Three of the six VSC reductions are associated with secondary windows (W3&4/1010 and W1/1011) serving two dual aspect rooms - LKD R1/1010 and study R1/1011. The main windows for these rooms would not be impacted and would maintain high residual VSC levels, in accordance with the BRE guidance. The NSL reductions to these windows would also be compliant.

9.480 Of the three remaining VSC and NSL transgressions, these would impact bedrooms which the BRE considers are less important. The reduction to bedroom window W2/1001 would be moderate at 34.4% coupled with a moderate to significant reduction in NSL.

9.481 The remaining two windows are associated with bedroom windows W1/1003 & W2/1011 which would receive moderate to significant reductions in VSC and NSL. While the results indicate that the proposed development would be a cause of reduction to VSC and NSL levels, it is also noted that these windows are already hindered by existing obstruction from the external fire escape attached to the flank of The Academy building, which would exacerbate the impact. This relationship can be seen on the above axonometric image of The Academy.

<u>The Academy (House)</u>

9.482 Situated to the north-west, this residential property has a rear elevation facing the site. The assessment sets out that the internal layouts have been assumed from external observation. Seven windows associated with three rooms have been assessed.

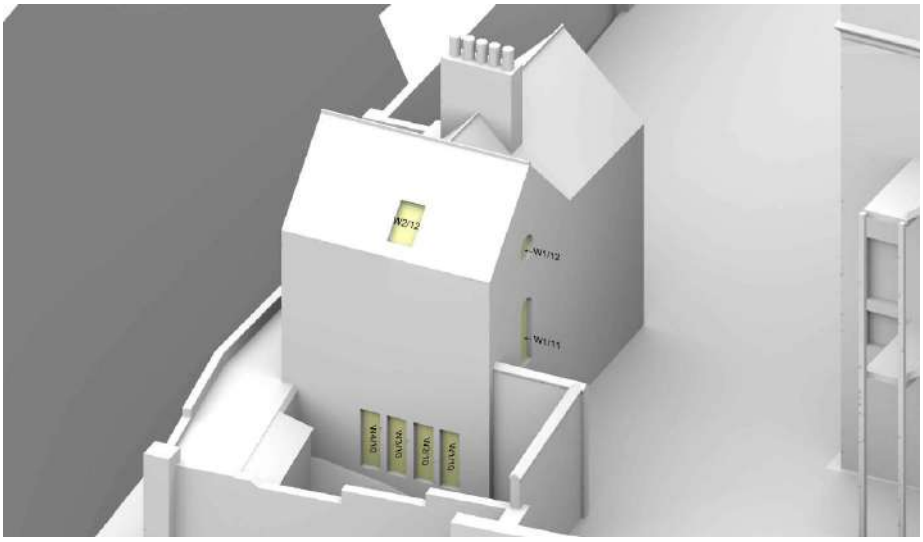


Figure 80: The Academy (House)

The Academy (House)		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R1/11 W1/11		20.8	16.2	**22.3**	122.9	69.9	69.8	0.1

9.483 The results for the Academy (House) indicate that there would be a minor VSC transgression of 22.3% to W1/11, which is a high level secondary window serving a dining room. Given that this property has multiple aspects and the remainder of the windows retain an acceptable level of daylight receipt, it is considered that this isolated instance would not be such that it would represent a reason for refusal.

2 to 12 (even) Archway Close

9.484 Located to the south of the site, of the six mixed use properties No.12 has a flank and primary elevation facing the site; the remaining properties only have a primary elevation facing the site at an oblique angle; the buildings are arranged over three and four floors. The assessment sets out that the internal layouts have been assumed from external observation. Forty windows associated with thirty-one rooms have been assessed.

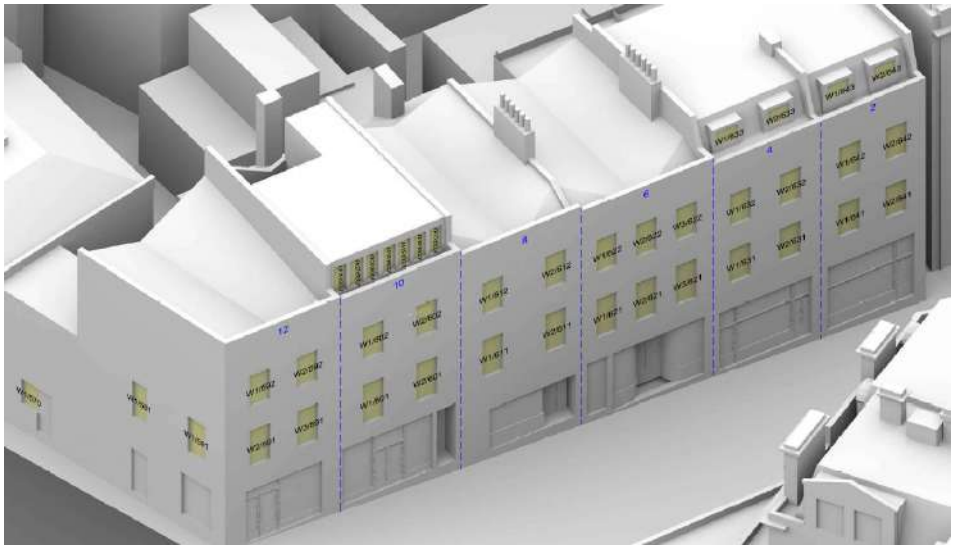


Figure 81: 2 to 12 (even) Archway Close

According to the results the following properties would experience BRE compliant levels of alterations to VSC and NSL:

- 2 Archway Close
- 4 Archway Close
- 6 Archway Close
- 8 Archway Close
- 10 Archway Close

12 Archway Close

9.485 This leaves 12 Archway Close with VSC and NSL alterations of greater than 20% and transgressions to four windows. However, all of the transgressions are recorded at a minor level of under 21% and while this would weigh against the scheme in the balance, given the good levels of retained VSC and acceptable NSL levels, it is considered to be acceptable in this case.

12 Archway Close		Vertical Sky Component			No Skyline (Daylight Distribution)			
Room / Window	Room Use	Existing (%)	Proposed (%)	Reduction (%)	Room (sqm)	Previous (sqm)	Proposed (sqm)	Reduction (%)
R1/591 W2/591		28.8	22.9	**20.8**	126.0	125.3	125.3	0.0
R2/591 W3/591		28.5	22.6	**20.7**	118.3	116.4	115.3	0.9
R1/592 W1/592		30.7	24.3	**20.7**	126.0	123.7	123.2	0.4
R2/592 W2/592		30.5	24.3	**20.4**	118.3	116.5	112.9	3.1

Overshadowing

9.486 A total of 30 amenity spaces have been assessed relating to neighbouring properties. The overshadowing assessment results indicated that on 21st March, five amenity spaces associated with Lidyard Road and four associated with The Academy Buildings and Annex would have less than 50% direct sunlight. This includes three properties at the Academy (Main Building) which would see the sun-on-ground completely reduced to 0%. It is acknowledged that this reduction gives rise to a degree of harm, however, the affected amenity spaces currently receive a low level of sunlight. This is due to their close proximity the Academy building and orientation lying immediately to the north east of the four storey building, which is the cause of the existing reduction. Comparatively, the rear

amenities spaces of the properties at Lidyard Road, just a few metres away from those worst affected, would see no to marginal changes in sunlight hours.

9.487 The properties at 19 and 21 Lidyard Road would see a reduction in sunlight but still retain 46% and 53% coverage on 21st March.

9.488 The 21st March results for the remaining 25 amenity spaces would be within the BRE guidelines.



Figure 82: 2 Hour BRE Overshadowing results for the Existing vs Proposed Scheme on March 21st

9.489 Using the 21st June results, this indicate that all of the amenity spaces would have exceptional sun on ground and as such during the summer months there would not be unacceptable reductions resulting from Blocks A and B.



Figure 83: 2 Hour BRE Overshadowing results for the Existing vs Proposed Scheme on June 21st

Daylight, Sunlight and Overshadowing Conclusions

9.490 The assessment reports no transgressions in terms of sunlight, and all properties that have been assessed would maintain Annual Probable Sunlight Hours (APSH) within the BRE guidelines.

9.491 The VSC and NSL daylight assessment results indicate that there would be a relatively small number of transgressions against the BRE guidelines. The majority of the transgressions would fall within the minor to moderate category and given the site's urban context are considered to be acceptable. The results also indicate there would be a significant loss of daylight, through both VSC and NSL at the Academy (Small Annex), although it is noted that this impact only relates to one bedroom window. There would also be moderate to significant daylight reductions through both VSC and NSL to two bedrooms windows in the Academy (Main Building), however it is noted that the impact would be exacerbated by an existing obstruction from the external fire escape attached to the flank of building. Overall, given the site's urban context the anticipated daylight impacts are, on balance, considered to be acceptable.

9.492 In terms of overshadowing, 3 properties at the Academy which would see the sunlight on ground completely reduced to 0% on 21 March. It is acknowledged that this reduction gives rise to a degree of harm, however, the affected amenity spaces already receive a low level of sunlight. due to their close proximity the Academy building and orientation lying immediately to the north east of the four storey building, which contributes to a significant proportion of the reduction. However, on June 21st the results indicate that all of the amenity spaces would have exceptional sun on ground and as such during the summer months. In the urban context of the site, these aforementioned impacts are considered to be acceptable.

ENERGY AND SUSTAINABILITY

9.493 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and standards relevant to sustainability are set out throughout the NPPF. Paragraph 161, under section 14. 'Meeting the challenge of climate change, flooding and coastal change', highlights that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

9.494 London Plan Policy GG6 seeks to make London a more efficient and resilient city, in which development must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050. Proposals must ensure that buildings are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

9.495 London Plan Policy SI 2, in support of the strategic objectives set out in Policy GG6 above, stipulates for new developments to aim to be zero carbon with a requirement for a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. It requires all major development proposals to contribute towards climate change mitigation by reducing carbon dioxide emissions by 35% through the use of less energy (be lean), energy efficient design (be clean) and the incorporation of renewable energy (be green). Moreover, where it is clearly demonstrated that the zero carbon figure cannot be achieved then any shortfall should be provided through a cash contribution towards the Council's carbon offset fund.

9.496 The Council requires all developments to meet the highest standards of sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change. Developments must demonstrate that they achieve a significant and measurable reduction in carbon dioxide emissions, following the London Plan energy hierarchy. All developments will be expected to demonstrate that energy efficiency has been maximised and that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.

9.497 Local Plan Policy S1: Delivering Sustainable Development sets out that the Council will seek to ensure the borough develops in a way that maximises positive effects on the environment and improves quality of life, whilst minimising or avoiding negative impacts. The Policy goes on to state that the Council will promote zero carbon development, with the aim that all buildings in Islington will be net zero carbon by 2050. To ensure that Islington is on the right trajectory to achieve this target, sustainable design must be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards and policies during design, construction, and operation of the development.

9.498 All development proposals must maximise energy efficiency and minimise on-site greenhouse gas emissions echoing the requirement to accord with the energy hierarchy:

be lean: use less energy and manage demand during operation. Energy demand (both annual and peak) must be minimised as far as possible through consideration of building fabric energy efficiency as an integral part of the design, with a focus on building form and passive design in addition to specification.

be clean: supply energy efficiently and cleanly, and utilise local energy resources (such as heat networks and secondary heat).

be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.

be seen: monitor, verify and report on energy performance.

9.499 Local Plan Policy S2 (part A) states that all development proposals are required to submit a Sustainable Design and Construction Statement (SDCS) which must demonstrate that the proposal meets all relevant sustainable design policies. The Sustainable Design and Construction Statement must show how sustainable design has been considered holistically from the start of the design process and is integrated throughout the construction and operation of the development.

9.500 Part B of the policy outlines that the SDCS must include the following details:

(i) Energy Strategy - demonstrate how the net zero carbon target will be met within the framework of the energy hierarchy and justify the heat source selection in accordance with the heating hierarchy. For detailed requirements see Policy S4: Minimising greenhouse gas emissions; and Policy S5: Energy Infrastructure.

(ii) Adaptive Design Strategy – demonstrate how the application addresses circular economy principles, including the impact and efficiency of construction materials, and how the development has been designed to adapt to change. For detailed requirements see Policy S10: Circular Economy and Adaptive Design.

(iii) Landscape Design Strategy – demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage, including the incorporation of SUDS into the landscape design. For detailed requirements see Policy G4: Biodiversity, landscape design and trees.

(iv) Integrated Water Management and Sustainable Drainage – demonstrate an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically. Major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet the drainage requirements. For detailed requirements see Policy S9: Integrated Water Management and Sustainable Drainage.

(v) Operational sustainability – demonstrate how the development will be designed to facilitate ongoing effective and sustainable use, management and maintenance. For detailed requirements see Policy S4 Minimising greenhouse gas emissions and Policy S6: Managing Heat Risk.

(vi) Air Quality - demonstrate how the development will be designed, constructed and operated to limit its contribution to air pollution, improve local air quality, and reduce exposure to poor air quality, especially for vulnerable people. For detailed requirements see Policy S7: Improving air quality.

The applicant has submitted a suite of documents relating to energy and sustainability including the Sustainable Design and Construction Statement (SDCS), prepared by Energist, dated 22/08/2024.

Carbon Emissions

CO2 Reduction

9.501 The London Plan Policy SI 2 Part C sets out a minimum CO2 reduction target, for regulated emissions only, of 35% against Building Regulation Part L 2013. Part L 2021 of national building regulations took effect on 15 June 2022 and the London Plan team has carried out a rebasing exercise to update the carbon reduction targets set out in Policy SI2. The GLA Energy Assessment Guidance and Carbon Emissions Reporting Spreadsheet have been updated accordingly to require an on-site carbon reduction of at least 35 per cent beyond Part L 2021. This is equivalent to a 55% reduction over Part L 2013.

9.502 The applicant's SDCS shows a reduction of 81.2% in Regulated Emissions against a Part L 2021 baseline, which significantly exceeds the 35% reduction target. However, the Energy Services team have reviewed the SDCS and advised that in terms of setting a baseline for the refurbishment elements, the SDCS referred to Part L1B, rather than the Notional Specification for Existing Buildings outlined in Appendix 3 of the GLA's Energy Assessment Guidance of June 2022. As a result, they have advised that this should be checked, with the baseline for the refurbishment elements and carbon reductions recalculated if needed (including for the overall development-wide figures). This has been requested from the applicant but at the time of writing the report no response had been received.

9.503 Local Plan policy requires onsite total CO2 reduction targets (regulated and unregulated) against Building Regulations Part L 2010 of 40% where connection to a decentralised energy network is possible, and 30% where not possible. These targets were subsequently adjusted for Part L 2013 to 39% where connection to a decentralised energy network is possible, and 27% where not possible (Policy S4D). Work is currently ongoing to rebase this target against Part L 2021, and this is expected to complete in early 2024. Until the rebased targets have been confirmed, applicants are expected to also model emissions against a Part L 2013 baseline, in order to assess performance against the Council target.

9.504 The applicant's SDCS does not quote any figures for unregulated CO2 emissions. As a result, it is not currently possible to assess compliance against Islington's 27% target, as there is insufficient information available.

9.505 In order to assess compliance the applicant needed to provide a comparison against a baseline derived from Part L1A/L2A 2013 (for all elements of the development, including refurbishment), and converted using SAP10 carbon factors.

9.506 The applicant has failed to demonstrate a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27% beyond Part L of the 2013 Building Regulations contrary to development plan policies seeking carbon reduction and minimisation and, as such, this is cited as a reason for refusal.

Zero Carbon Policy

9.507 In accordance with the Council's Zero Carbon Policy, Policy S4G requires that "Where it is clearly demonstrated that the zero carbon target cannot be fully achieved on-site, any shortfall must be provided through a cash in lieu contribution to Islington's carbon offset fund. All major developments and minor new build developments of one unit or more will be required to pay the full cost of offsetting the remaining regulated emissions"

9.508 The calculation of the amount of CO2 to be offset, and the resulting financial contribution, shall be specified in the submitted Energy Statement.

9.509 Carbon offsetting payments will be calculated based on the remaining regulated carbon emissions using a nationally recognised non-traded price of £95/tonne (over 30 years equivalent to £2,850/tonne), as set out in Policy SI 2 of the London Plan & Islington Policy S4.

9.510 The applicant's SDCS quotes a figure of £30,544. However, this calculation appears to be based on the old offset rate of £920 but applied to regulated emissions only. The Energy Services Team have advised that the offset contribution should be recalculated based on the rate of £2,850 per tonne, as above, and based on the final GLA methodology emissions. In the event of an appeal, the council would suggest that the applicant provides this information for the purposes of the S106.

Sustainable Design Standards

9.511 Local Plan Policy S3 Part A states 'Major and minor residential developments involving refurbishment or extensions are required to achieve a final (post-refurbishment) certified rating of Excellent under BREEAM Domestic Refurbishment 2014 (or equivalent scheme) and must make reasonable endeavours to achieve an Outstanding rating.' The policy sets out a range of BREEAM requirements.

9.512 Separate BREEAM Pre-assessments were carried out for the development. These include a New Construction assessment for new-build student accommodation, a Refurbishment and Fit-Out 2014 assessment for multi residential students accommodation, and a Domestic refurbishment assessment, covering the relevant elements of the Holborn Building.

9.513 Under the New Construction pre-assessment, the new Student Accommodation is predicted to achieve an 'Excellent' rating, with a score of 76.90%. For the refurbished buildings student accommodation, it is predicted that these will also achieve a rating of 'Excellent', with an overall score of 84.53%. Finally, for the refurbished Holborn building, this is also predicted to achieve an 'Excellent rating, with a score of 75.78%. These all represent fair to significant margins of comfort over the minimum 70% score required to achieve 'Excellent'.

9.514 The development is expected to achieve a Home Quality mark 4-star rating, with an overall score of 275, exceeding the minimum 4-star requirement of 240.

Energy Demand Reduction (Be Lean) and minimising overheating

9.515 Local Plan Policy S1Ca states 'All development proposals must maximise energy efficiency and minimise on-site greenhouse gas emissions in accordance with the following energy hierarchy:

- *be lean: use less energy and manage demand during operation. Energy demand (both annual and peak) must be minimised as far as possible through consideration of building fabric energy efficiency as an integral part of the design, with a focus on building form and passive design in addition to specification.'*

9.516 Local Plan Policy S4A states 'All development proposals are required to demonstrate how greenhouse gas emissions will be reduced in accordance with the energy hierarchy (set out in Policy S1) as part of the SDCS. Major developments, minor new build developments, and larger minor extensions must provide a more detailed energy assessment as part of the SDCS.'

9.517 In accordance with London Plan Policy S1 2 Part C and Islington Policy S4F, residential development should achieve on-site carbon reductions of 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures (Be Lean stage). Additionally, major new-build residential developments are expected to achieve Full Fabric Energy Efficiency Standards, as outlined in Policy S4, Table 6.3.

Element	***Islington Env. Design SPD recommendation***	***Developer Energy Strategy***
External Walls	*0.2 W/m²K*	0.18 W/m²K
Roof	0.2 W/m²K	0.11 W/m²K
Floor	0.2 W/m²K	0.12 W/m²K
Windows	1.5 W/m²K	1.2 W/m²K
Doors	1.0 W/m²K (Solid) 1.5 W/m²K (Glazed)	Not specified
Air tightness (m³h.m²@50Pa)	3.0 or better with MVHR 5.0 with no MVHR	3.0

9.518 The U-values proposed for roof, floor, and windows are all better than the recommendations of Islington's Environmental Design SPD. Air permeability is line with the 3.0 high limit recommended for a building with MVHR. Low energy lighting is proposed throughout the development.

9.519 The SDCS shows the residential element achieving a reduction of 13.2% in Regulated Emissions over a Part L 2021 baseline, and the non-residential element achieving a 19.6% reduction over the

baseline. These both slightly exceed the required 10% and 15% reductions – subject to any changes made to the baseline figures, as per the previous comments in the Carbon Emissions section above.

Dynamic thermal modelling and the need for active cooling

9.520 Local Plan Policy S6 Part D states, 'Major developments are required to include details of internal temperature modelling under projected increased future summer temperatures, to demonstrate that the risk of overheating has been addressed as part of the SDCS.'

9.521 Thermal modelling should be carried out using CIBSE TM49 DSYs and assessed against the criteria of CIBSE TM52 (for non-residential development) and CIBSE TM59 (for residential development) to demonstrate the risk of overheating has been addressed. (GLA Energy Assessment Guidance 2022; Section 8.)

9.522 Thermal modelling should be carried out without the inclusion of active cooling (as above) to show there is a risk of overheating before active cooling can be justified Islington S6 C states 'Use of technologies from lower levels of the hierarchy will not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.'

9.523 The applicant's SDCS provides a discussion of the cooling hierarchy. In terms of passive measures, this focuses initially on minimising solar and external heat gains via sizing of glazed areas and appropriately specified g-values. Internal heat gains are to be minimised via a focus on reducing heat outputs from lighting, equipment and internal pipework. The potential maximisation of thermal mass will also be considered.

9.524 In terms of ventilation, natural ventilation will be available throughout much of the development. However, Mechanical Ventilation with Heat Recovery is also proposed throughout the development – both on the grounds of maintaining comfortable temperatures in the summer months, as well as minimising heat losses in the winter.

9.525 It is stated in one part of the report that tempered air cooling is proposed for all dwellings throughout the development – while another statement suggests this will only be applied in dwellings which would otherwise be at risk of overheating.

9.526 As such, the specification of any cooling (or otherwise) for the non-residential elements is not clear and the Energy Services Team have advised that these points should both be clarified.

9.527 A TM59 overheating analysis has been undertaken for the residential elements in Blocks A, B & C, based on a sample of dwellings, generally considered to be at higher risk of overheating. The underlying assumptions for the analysis were generally considered to be reasonable.

9.528 The results show that the vast majority of rooms in Blocks A, B & C fail on the overheating criteria under the natural ventilation and mechanical ventilation scenarios and only pass across the board where the air tempering cooling is applied.

9.529 A TM59 overheating analysis was also carried out for the Apex student housing block. This also shows the relevant areas failing under both the natural and mechanical ventilation scenarios and requiring tempered air cooling in order to comply.

9.530 As a result, the Energy Services Team have recommended that the approach to the lower levels of the cooling hierarchy is reviewed, to determine whether this can be enhanced and cooling demands either reduced or removed.

Low carbon energy supply (be clean)

9.531 London Plan Policy SI3D states that major development proposals within Heat Network Priority Areas (covers all of Islington) should have a communal low-temperature heating system:

> 1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
>
> a) connect to local existing or planned heat networks
>
> b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)

c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)

d) use ultra-low NOx gas boilers

9.532 Local Plan Policy S5 mirrors this hierarchy and also states in Policy S5A that "Heating systems must have a maximum annual carbon content of heat of less than 280 gCO_2/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available BEIS energy projections (UEPs) for the first 25 years of operation of the building."

9.533 Policy S5 Part L adds "The SDCS should set out a strategy for how the development will be future-proofed to achieve zero carbon emissions on-site by 2050. Where the development is able to connect to a heat network, the SDCS must demonstrate how the heat network will be future-proofed to achieve zero carbon and the timeline for achieving this." Policy S5 Part F requires that "All major residential developments and larger minor new-build residential developments are required to provide an estimate of the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system within the SDCS. Major applications must provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes."

9.534 Finally, Policy S5 (supporting paragraph 6.78) notes that "Specific design standards to enable connection and future connection to heat networks are set out in the Environmental Design SPD. Heat networks and communal heating systems must be designed, constructed and operated to a high standard in accordance with CIBSE CP1: Heat Networks: Code of Practice (or any relevant successor document), which sets minimum and best practice standards)."

9.535 It is currently proposed that heating and hot water will be provided to the development via a communal site-wide network, served via air source heat pumps.

9.536 The use of secondary heat sources is not assessed in any detail. However, officers are not aware of any significant and realistic opportunities for this in the immediate area – so would not request any further information on this for the time being.

9.537 The SDCS indicates that the carbon content of any heat will be below 280 gCO_2/kWh.

9.538 The SDCS does not appear to give any information on how the development heating system will comply with CP1, or anticipated costs of heat, standing charges this information would need to be provided.

<u>District heating and cooling networks</u>

9.539 Local Plan Policy S5 Part E states "As part of the SDCS, all major developments must demonstrate that they have assessed the feasibility of heat network connection (including a Shared Heat Network – see Policy S5I) or other appropriate heat sources, in accordance with the heating hierarchy, in order to ensure low and zero carbon heating options are prioritised"

9.540 Local Plan Policy S5 Part G states that "Major developments located within 500 metres of an existing heat network, and larger minor new-build developments located within 50 metres, must be designed to connect to that network at the time of construction, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible. An existing heat network includes a planned network that will be in existence by the anticipated time of practical completion", and S5H that "Major developments located within 500 metres of a planned future heat network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission must be designed to be able to connect to that network in the future. Developers are required to commit to connection and contribute to the cost of connection via a legal agreement, unless a feasibility assessment demonstrates that connection is not reasonably possible"

9.541 Feasibility assessments should consider the size of the development, heat loads and energy demands; the distance to network pipes; physical barriers and other developments in the vicinity that may also be required to connect to the network. Any associated financial comparisons should be carried out on a whole life-cycle costing basis.

9.542 Local Plan Policy S5 Part J requires that "Where connection to an existing or future heat network is deemed possible under parts G and H above, major developments are required to provide a preferred energy strategy and an alternative energy strategy (as part of the SDCS). The preferred energy strategy should be enacted based on connection to a heat network. In cases where it is not reasonably possible to connect to a heat network the alternative energy strategy should be enacted and the heat source will be selected in accordance with the heating hierarchy."

9.543 The Energy Strategy assesses potential for connection to a DE network in the Archway area. There are longer-term aspirations for the creation of a heat network in the Archway area; however, any timelines around this are very uncertain and it is unlikely that any Archway network would be available in a 3-year period. For these reasons, the applicant does not propose an immediate connection to a network, and this is accepted.

Site-wide communal system/network and design for district network connection

9.544 London Plan Policy SI3 Part D states "where a heat network is planned but not yet in existence the development should be designed to allow for the cost effective connection at a later date". The Council's Environmental Design Guide states "to ensure schemes are future proofed for future connection to DENs, all schemes should incorporate a communal heating network linking all elements of the development (technical design standards to enable future connection are set out in Appendix 1)."

9.545 Local Plan Policy S5 Part H states "Major developments located within 500 metres of a planned future heat network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission must be designed to be able to connect to that network in the future. Developers are required to commit to connection and contribute to the cost of connection via a legal agreement, unless a feasibility assessment demonstrates that connection is not reasonably possible."

9.546 The Council's Environmental Design Guide states "to enable this and to ensure schemes are future proofed for future connection to DENs, all schemes should incorporate a communal heating network linking all elements of the development (technical design standards to enable future connection are set out in Appendix 1, as well as Islington's Guidelines for Connecting to Heat Networks Parts 1 & 2)."

9.547 The SDCS indicates that the development will be future-proofed for connection to a DEN. This will be accomplished via a site-wide communal heating system, with a connection point and a protected route to the edge of the development. This is welcomed, however, further details would be provided showing any reserved riser space/protected pipework routes within the development and to the edge of the site, a schematic of the heating and cooling system which shows connection points, and information regarding flow and return temperatures.

9.548 In addition, there is a route across the northwestern part of the development site, which has previously been identified as a corridor for pipework, as part of the route of any future Archway heat network. It had previously been agreed that this route would be safeguarded via the installation of connecting pipework. The applicant would be required to confirm their approach as to how this pipework route will be safeguarded.

Shared energy networks

9.549 London Plan Policy SI3 Part D states in the energy hierarchy that low emission CHP should only be used: "where there is a case for CHP to enable the delivery of an area wide network, meet the development's electricity demand and provide demand response to the local electricity network" Islington policy S5I states "Where connection to an existing or future DEN is not possible, major developments should develop and/or connect to a Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible." Where connection to an existing or future heat network is not possible, major developments must develop and/or connect to a low or zero carbon Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible.

9.550 The energy statement does not address shared heat networks, as such. However, the priority in this case would be to ensure the futureproofing of the development, in order to enable any potential

connection to a future Archway Heat Network. Therefore, any other information relating to shared heat networks is not required at this time.

9.551 Alternative low carbon on-site plant

9.552 London Plan Policy SI3 Part D (b) states that where major developments can't connect to local existing or planned heat networks they should next look to 'use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)'. These should address the heating hierarchy, as outlined above.

9.553 The Energy and Sustainability Strategy proposes air source heat pumps and again, the priority in this case would be to ensure the futureproofing of the development, in order to enable any potential connection to a future Archway Heat Network.

Renewable energy supply (be green)

9.554 The energy hierarchy London Plan Policy SI2 Part A states that major developments should look to 'maximise opportunities for renewable energy by producing, storing and using renewable energy on-site' at the 'Be Green' stage. Local Plan Policy S1 Part C states 'All development proposals must maximise energy efficiency and minimise on-site greenhouse gas emissions in accordance with the following energy hierarchy:

- be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.

9.555 The Council's Environmental Design SPD (page 12) states "use of renewable energy should be maximised to enable achievement of relevant CO2 reduction targets."

9.556 Air source heat pumps are proposed, and these are discussed earlier in the report. In addition, solar PV arrays totalling 54.4kWp are proposed. The kWh/yr outputs and overall m2 panel area would also need to be provided. In the event of an appeal this could be secured via condition.

Be Seen

9.557 The London Plan Policy SI2 states that developments must "*be seen: monitor, verify and report on energy performance" and that "The move towards zero-carbon development requires comprehensive monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London."*

9.558 Sufficient detail has been provided on how the development will meet the GLA's 'be seen' and operational energy use has been provided within the SDCS. In the event of an appeal, the Council would also seek to secure this via Section 106 Agreement, based on the template wording used by the GLA.

Draft Green Performance Plan (GPP)

9.559 Local Plan Policy S2 Part D states 'Developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement, including through the Green Performance Plan'. The council's Environmental Design SPD provides detailed guidance and a contents check-list for a Green Performance Plan.

9.560 A draft Green Performance Plan has been provided, as an appendix to the SDCS. The information provided within this considered to be acceptable. However, the Energy Services Team have advised that further details are required regarding arrangements for Management and Monitoring, and Arrangements for Addressing Performance. Although the GPP is only at draft stage, information on outline arrangements would need to be provided. In the event of an appeal, the Council would seek a finalised Green Performance Plan to be submitted which is secured through a section 106 agreement.

Whole Life-cycle Carbon

9.561 In accordance with London Plan Policy SI 2 the Applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

9.562 Two separate Whole Life Carbon Assessments (WLCA) have been submitted for the new build and heritage elements of the development. The Heritage WLCA is also split up into separate buildings. This approach is not accepted and a revised WLCA would need to be submitted which addresses the site as a whole (including both the new build and heritage elements) and sets out the WLC emissions for the entire development.

9.563 It is noted that the Circular Economy Statement provides justification for demolishing a number of buildings on the site. However, the WLCA must adopt a carbon optioneering approach to ensure that all options to retain and reconstruct the existing buildings have been explored, and to fully assess the WLC impacts of demolishing vs retaining these buildings. The GLA's CES Guidance specifically states that "Where disassembly or demolition is proposed, applicants should set out how the options for retaining and reconstructing existing buildings have been explored and discounted; and show that the proposed scheme would be a more environmentally sustainable development". This has not been demonstrated in the submission.

9.564 Whole life-cycle carbon emissions have been calculated using One Click LCA in compliance with RICS and GLA requirements. Both reports have also fully addressed the GLA's set Whole Life Carbon Reduction Principles. This is accepted and this approach should be utilised in the revised WLCA.

New Build WLCA

9.565 The New Build WLCA covers the student housing and affordable housing blocks of the site (Blocks A, B, C, and the PBSA tower).

9.566 Upfront carbon (A1-A5) has been estimated at 750 kgCO2e/m2 GIA. This aligns with the GLA benchmark of 850 kgCO2e/m2. However, the Sustainability Officer has queried whether any other measures could be undertaken to further reduce the upfront carbon in line with the GLA aspirational benchmark of 500 kgCO2e/m2.

9.567 Whole life-cycle carbon (B-C, excluding B6-B7) has been estimated at 631 kgCO2e/m2 GIA. This fails to meet the GLA benchmark of 350 kgCO2e/m2 and the aspirational benchmark of 300 kgCO2e/m2. This is a concern and would need to be addressed.

9.568 Whole life-cycle carbon (A-C, excluding B6-B7) has been estimated at 1,381 kgCO2e/m2 GIA. This fails to meet the GLA benchmark of 1,200 kgCO2e/m2 and aspirational benchmark of 800 kgCO2e/m2. This is a concern and would need to be addressed.

9.569 The WLCA demonstrates a lack of consistency with the GLA benchmarks, particularly at stages B-C. This is a serious concern and would need to be addressed through further consideration of the approach to development and proposed materials.

Heritage WLCA

9.570 The Heritage WLCA covers the Charterhouse Building, Clerkenwell Building and Holborn & Admin Building, all of which will be retained and refurbished.

9.571 Upfront carbon (A1-A5) has been estimated at 578 kgCO2e/m2 GIA (Charterhouse Building), 679 kgCO2e/m2 GIA (Clerkenwell Building) and 809 kgCO2e/m2 GIA (Holborn & Admin Building). All three buildings fall below the GLA benchmark of 850 kgCO2e/m2. However, the Sustainability Officer has queried whether any other measures could be undertaken to further reduce the upfront carbon in line with the GLA aspirational benchmark of 500 kgCO2e/m2. This is particularly pertinent since this aspect of the development involves retaining existing structures. The upfront carbon should, therefore, be low and potentially capable of achieving the GLA aspirational benchmark.

9.572 Whole life-cycle carbon (B-C, excluding B6-B7) has been estimated at 648 kgCO2e/m2 GIA (Charterhouse Building), 766 kgCO2e/m2 GIA (Clerkenwell Building) and 523 kgCO2e/m2 GIA (Holborn & Admin Building). All three buildings fail to meet the GLA benchmark of 350 kgCO2e/m2 and the aspirational benchmark of 300 kgCO2e/m2 (albeit to varying degrees). This is particularly concerning since this element of the development involves retaining and refurbishing existing buildings. The applicant would need to consider options to reduce carbon emissions and achieve the GLA benchmarks. It is noted that retaining more of the existing building materials beyond the façades would assist with this requirement.

9.573 Whole life-cycle carbon (A-C, excluding B6-B7) has been estimated at 1,266 kgCO2e/m2 GIA (Charterhouse Building), 1,445 kgCO2e/m2 GIA (Clerkenwell Building) and 1,332 kgCO2e/m2 GIA (Holborn & Admin Building). All three buildings fail to meet the GLA benchmark of 1,200 kgCO2e/m2 and aspirational benchmark of 800 kgCO2e/m2. Again, to varying degrees. The Charterhouse Building just exceeds the 1,200 GLA benchmark, however the Holborn & Admin Building and the Clerkenwell Building are significantly exceeding the GLA benchmark. The WLCA sets out how the carbon emissions could be further reduced and optimised during the coming design stages. However, the applicant is required to review the designs to establish whether the emissions can be further reduced at application stage. This requirement has not been fulfilled by the applicant.

WLCA Conclusions

9.574 Overall, there are significant concerns with the applicant's approach to WLC modelling. The WLCA needs to be revised to take a whole-site approach, which includes carbon optioneering to ensure that all options to retain and reuse existing buildings have been explored. If demolition is still proposed, it will be necessary to fully assess the WLC impacts of retention vs demolition. Furthermore, the GLA benchmarks have not been achieved across different parts of the site. The revised WLCA must address this. The applicant would need to review the development approach, as well as the proposed materials, to ensure that GLA benchmarks are achieved for the site as a whole.

9.575 In the absence of a revised WLCA the applicant has failed to demonstrate compliance with the GLA WLCA Guidance, including failure to take a carbon optioneering and whole-site approach to the whole life-cycle carbon assessment. This absence of information alongside the absence of other key sustainability information is cited as a reason for refusal.

Circular Economy

9.576 London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI 7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

9.577 Local Plan Policy S10 Part A requires all developments to adopt a circular economy approach to building design and construction. Policy S10 Part E requires all major developments to provide an Adaptive Design Strategy which outlines this approach. The applicant has submitted a Circular Economy Statement, which sets out how they will comply with a number of circular economy principles. However, some further information is required to demonstrate that all of the requirements in Policy S10 and requirements of the GLA CES Guidance have been addressed.

9.578 The Circular Economy Statement sets out reasons why some of the existing buildings will not be retained. However, it is not considered that all options to retain and reconstruct the existing buildings have been explored and discounted in full, as the GLA CES Guidance requires. This is be considered in more detail in the Whole Life Carbon Assessment section above.

9.579 It is noted that the applicant intends to explore opportunities to recycle the existing elements, as well as excavation and demolition waste. A Pre-demolition Justification Report is referred to but has not been submitted. A copy of this report would need to be provided. The only example which has currently been provided is reusing crushed concrete from existing hard standing as fill materials. However, a firmer commitment to reusing materials is required. A list of all of the materials which will be reused as part of the development would need to be provided, in line with Policy S10, Part B & Part E(vi).

9.580 A target of 20% of build materials to be comprised from recycled or reused content has been set. This is welcomed (Policy S10, Part C requires a minimum of 10%) as is the proposed use of concrete with high GGBS content. However, the proposed % of GGBS has not been specified and the applicant has not provided a justification as to why other materials with high-recycled content are being used.

9.581 The Circular Economy Statement does not clarify if local suppliers be utilised, in line with Policy S10 Part F.

9.582 In terms of designing the development for ease of deconstruction and reuse of materials, it is noted that some general measures have been identified. However, in line with Policy S10 Part E (v), the

applicant is required to be more specific in terms of which materials this would support the recovery of.

9.583 It is noted that a Bill of Materials Table has not been submitted as part of the Circular Economy Statement.

9.584 The proposal has failed to provide sufficient detail to demonstrate compliance with the GLA Circular Economy Statement Guidance, including failure to take a whole-site circular economy approach. This lack of information, alongside other key missing information relating to sustainability is listed as a reason for refusal, as the applicant has failed to provide sufficient information to demonstrate compliance with sustainability policies of the development plan.

Managing Heat Risk

9.585 Chartered Institute of Building Service Engineers (CIBSE) TM59 assessments have been undertaken for Blocks A, B and C, as well as the PBSA tower. However, no CIBSE TM59 assessments have been provided for the historic Charterhouse Building, Clerkenwell Building and Holborn & Admin Building and no justification of their omission has been set out. The applicant is required to provide modelling for the whole development in order to demonstrate compliance with Policy S6.

9.586 The SDCS includes information on how the development has been designed to reduce potential for overheating and has considered the cooling hierarchy, as per Policy S6, Parts A-C. However, the SDCS does not provide sufficient detail on each level of the hierarchy. The applicant has not demonstrated what measures have been employed at each stage of the hierarchy or detailed the exploration of measures that have been discounted and why. Information that is missing includes:

9.587 How has the amount of heat entering a building been reduced through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls

9.588 How will heat gains be managed through exposed thermal mass to further regulated internal temperatures

9.589 Passive ventilation via openable windows is proposed. However, it is noted that in response to the acoustician's advice, openings on some facades with high external noise levels should remain closed. Clarification is required in terms of which windows/openings will not be openable.

9.590 It is noted that all areas of the development will be provided with Mechanical Ventilation with Heat Recovery (MVHR). The SDCS states that active cooling is proposed in all areas identified within the overheating assessment as at risk. According to the Ventilation Strategy, this includes all of the newly constructed apartments (Blocks A, B and C). Each apartment will have "an ancillary cooling module which will be compatible with the MVHR unit". Policy S6 seeks to avoid active cooling unless there are exceptional circumstances, where, overall, it would be more energy efficient and better for air quality than natural ventilation, and where low energy mechanical ventilation is demonstrably unfeasible. It is not considered the proposed approach has been justified and followed the cooling hierarchy. The applicant is required to fully address all of the stages of the cooling hierarchy and this has not been provided. Measures at the higher levels of the hierarchy must be prioritised before active cooling is proposed. To justify active cooling, the applicant is required to clearly set out exceptional circumstances which mean that active cooling is required in all apartments – however, this has not been provided.

9.591 Finally, it is not clear whether air conditioning is proposed in any other areas of the development. Installing air conditioning within all of the new build apartment blocks will have significant energy implications, which also must be fully considered within the development's overall Energy Strategy. The higher levels of the hierarchy would need to be fully explored to demonstrate that they have been prioritised, and how the use of lower-level energy intensive cooling has been minimised

Air Quality

9.592 The application site is located within the Islington Air Quality Management Area (AQMA) and is part-located within the 'A1 Holloway Road from Highbury to Archway' Air Quality Focus Area (AQFA).

9.593 An AQA has been submitted which confirms that the development will be Air Quality Neutral:

- The heat demands of the proposed development will be met by electricity. As such, it is assumed that there are no direct NOx emissions and the BEB benchmark is met.

- The average number of annual trips has been estimated at 16,425. This is significantly less than the TEB benchmark of 50,160 annual trips (440 dwellings x 114 benchmark trip rates).

9.594 The Dust Risk Assessment has identified the application site as 'High Risk'. However, mitigation measures have been suggested for the construction stage. Following the implementation of these measures, the impacts of dust and emissions, although adverse, will be temporary and 'not significant'.

9.595 The Air Quality Positive Statement (AQPS) also includes mitigation strategies for both construction and operational stage. It is considered that further measures could be implemented in relation to green infrastructure. The AQPS states that "trees line Highgate Hill and Archway Road and a Heritage Garden is proposed". However, there appears to be further opportunities for greening around the perimeter of the site, particularly in the southern section of the site around the PBSA tower, Clerkenwell Building and Student Amenity Building, as well as along the eastern edge of the site (along Archway Road). Furthermore, it is not clear as to whether air purifying species of plants and trees have been considered to help reduce air pollution.

9.596 The proposal has failed to fully investigate and implement all reasonable on-site opportunities to improve air quality, in line with the GLA Air Quality Positive Guidance. This alongside the other missing sustainability information outlined in the report is cited as a reason for refusal.

Flood Risk Management

9.597 A Flood Risk Assessment has been submitted with the application that covers surface water, groundwater flooding, fluvial, tidal, sewer and reservoir flooding.

9.598 The development is in a Critical Drainage Area (CDA) but is not in a Local Flood Risk Zone.

9.599 Since the development site is located within Flood Zone 1 and the development is in the 'More Vulnerable' category, the development can be considered appropriate for the proposed use, and therefore passes the Sequential Test. The Exception Test is not required as the site passes the Sequential Test.

9.600 The site's location within a CDA means that SUDS must be prioritised to prevent surface water flooding. Policies S8 and S9 require an integrated approach to water management and flood risk which considers sustainable drainage.

Water Management and SUDS

9.601 The SDCS confirms that mains water consumption of a maximum of 110 litres or less per head per day (excluding an allowance of 5 litres or less per person per day for external water consumption) will be targeted. However, this should be a maximum of 105 litres or less per head per day (excluding an allowance of 5 litres or less for external water consumption) in line with Policy S9, Part M.

9.602 All developments assessed under BREEAM New Construction 2018 and Non-Domestic Refurbishment and Fit-out schemes are required to score minimum 'credits', in addition to the minimum acceptable requirements for a BREEAM excellent rating and Local Plan Policy S3 Part E (iv) sets out that all credits on Water consumption (Wat 01), or a minimum of 3 credits where rainwater and/or greywater recycling is demonstrated not to be feasible. Rainwater/greywater recycling does not appear to have been considered, particularly in terms of the new build blocks where there is more opportunity for this to be designed in. This is especially important in relation to the student accommodation block, which is likely to have a high level of water consumption due to the nature of the development. Local Plan Policy S9, Part N requires major developments and/or developments with high/intense water usage - including student housing - to incorporate a rainwater and greywater recycling system. These requirements have not been appropriately considered and in the event of appeal the appropriate condition requiring details of rainwater and greywater recycling would be requested.

9.603 A range of flow control devices have been proposed to regulate the supply of water to each WC area/facility to reduce water wastage in line with Policy S9 Part K.

9.604 A Flood Risk Assessment and Sustainable Drainage Strategy has been submitted which details the proposed drainage strategy. However, the London Plan Drainage Hierarchy has not been considered. This is a policy requirement in line with Policy S9 Part B, as well as London Plan Policy SI 13.

9.605 Several SuDS measures have been proposed including blue/green roofs, swales, permeable paving and geo-cellular and modular systems - all allowing gradual release of rainwater. However, as mentioned above, these measures must be considered in the context of the London Plan Drainage Hierarchy. The hierarchy must be followed, with each level fully addressed, to ensure that green features are prioritised over grey features. Further information would be required to demonstrate full consideration of the Drainage Hierarchy.

9.606 It also appears that the development would include large areas of impermeable hard surfacing in the southern part of the site (around the student accommodation and student amenity buildings) using "Paving Type 02: Sienna Sett Sandstone by Tobermore or similar". The Urban Greening Factor Map classifies this area as impermeable, which contributes to the UGF score. Policy S9, Part C resists the use of impermeable paving. Clarification would be required as to whether the paving is impermeable.

9.607 Furthermore, the coverage of swales and rain gardens have not been maximised as far as possible. Several small swales/rain gardens are located in the northern part of the site. It is noted that the Flood Risk Assessment and Sustainable Drainage Strategy refers to "the general steep fall across the site" which "will greatly reduce the benefit of any provided". However, there are concerns that the topography of site may lead to surface water ponding near Navigator Square, particularly if impermeable paving is proposed in the southern part of the site. The applicant has not demonstrated the requirement to maximise the provision of swales/rain gardens, in line with Policy S9.

9.608 Blue/green roofs are proposed on new build Blocks A, B and C, details of which would need to be secured by condition. However, no green/blue roof areas are proposed for the PBSA tower roof which do not already contain plant.

9.609 A maintenance plan has been proposed and submitted as required by Policy S9, Part E.

9.610 The greenfield runoff rate as required by Policy S9 Part F is 8l/s/ha. The site's total area is 1.48ha. This figure should have been used to calculate the site's greenfield runoff rate, rather than the total impermeable area, as this is not a policy requirement. As such, the greenfield runoff rate for the whole site is calculated as 11.84l/s (1.48ha x 8l/s).

9.611 The applicant has proposed a runoff rate of 12.40l/s which falls short of the greenfield runoff rate by 2.36l/s. Considering that the whole site will not be developed, this is not an insignificant failing. Reducing the runoff rate as far as possible is also particularly important given the site's location within a CDA. The applicant has not demonstrated that they have minimised this to as close to the greenfield rate as possible, as per Policy S9, Part F (ii). Further options to reduce the greenfield run-off rate would need to be explored by the applicant.

9.612 The modelling appears to show that there will be a total runoff rate of 12.4l/s split between three separate existing outfalls. Discharge to Highgate Hill and Tollhouse Way will be at 2.0l/s each, however the remaining 8.4l/s will discharge to Archway Road. This rate is relatively high and the applicant would be required to explore all possible options to reduce this rate.

9.613 It is noted that correspondence with Thames Water as part of the Pre-Planning Enquiry has indicated that they are not favourable to a complex flow control with a peak flow equivalent to the 1 in 100 year greenfield runoff rate.

9.614 Excess flows will be attenuated (with an attenuation volume of 1,138 m3) via a mixture buried geo-cellular tanks, tanked permeable paving, and blue roof elements to new build areas. However, the applicant is required to review the proposed measures (in line with the Drainage Hierarchy) to establish whether there is any scope to increase attenuation and reduce runoff to the greenfield rate.

9.615 It is also noted that the Flood Risk Assessment and Sustainable Drainage Strategy proposes the use of swales (see paragraph 7.02.3). It does not appear that these have been factored into the attenuation calculation and further clarification would be required.

9.616 The proposal has failed to meet the full requirements for drainage and flood risk assessment information. In the event of an appeal, the Local Planning Authority would request that the required details are submitted through the landscaping and drainage conditions.

Energy and Sustainability Conclusion

9.617 Local Planning Authority Officers, including energy and sustainability officers, have reviewed the suit of documents submitted to address the policy requirements of the Development Plan's sustainability

requirements. Although some of the incomplete information can be addressed via condition in the event of the appeal, it is considered that there are a number of absences of key sustainability information which means the applicant has failed to demonstrate the proposals compliance with sustainability policies. These include:

- failing to demonstrate a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27% beyond Part L of the 2013 Building Regulations;
- Failing to provide sufficient detail on how the development will reduce the potential for overheating and reliance on air conditioning systems, in line with the cooling hierarchy;
- Failing to fully investigate and implement all reasonable on-site opportunities to improve air quality, in line with the GLA Air Quality Positive Guidance;
- Failing to demonstrate compliance with the GLA Whole Life Carbon Assessment Guidance, including failure to take a carbon optioneering and whole-site approach to the whole life-cycle carbon assessment;
- Failing to provide sufficient detail to demonstrate compliance with the GLA Circular Economy Statement Guidance, including failure to take a whole-site circular economy approach;

As such, this absence of information is cited as reason for refusal.

BIODIVERSITY, LANDSCAPE AND TREES

9.618 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

9.619 Local Plan Policy G1 Part A states that development proposals must preserve and enhance existing green infrastructure, and, where relevant, provide new green infrastructure. Opportunities to connect new/enhanced green infrastructure to existing green infrastructure must be thoroughly investigated. Part D of the Policy sets out that sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions. The Council will not consider existing site circumstances as the baseline for new provision.

9.620 Local Plan Policy G4 states that 'All developments must protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting and enhancing connectivity between habitats.'

Green Roof and Vertical Greening

9.621 Local Plan Policy G4 requires development proposals to use all available roof space to incorporate biodiversity-based extensive green roofs, subject to other planning considerations. Green roofs must be considered at the earliest possible stage of designing a proposal to ensure their effective operation. They must be designed to:

(i) maximise benefits for biodiversity, sustainable drainage and cooling;

(ii) promote ecological diversity including planting based on wildflowers and a maximum of 25% sedum planting;

(iii) have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible; and

(iv) be easily monitored, allowing for an ongoing effective process to inspect and monitor the quality of the green roof.

9.622 New-build developments, and all major applications (including those involving refurbishments) must maximise the greening of vertical surfaces as far as reasonably possible.

9.623 Blue/green roofs are proposed on the new build Blocks A, B and C; however the applicant has not provided sufficient details at this stage to confirm whether the proposed green roof would be extended to stretch below the PVs to create a bio-solar roof in accordance with Local Plan Policy G5 Part D. The successful delivery and maximisation of bio-solar roofs is a key consideration and, in the

event of an appeal, the applicant will be required to provide additional information of the bio-solar roof strategy vi condition.

9.624 It is noted that a blue/green roof has not been included on top of the student accommodation tower and it is recognised that there are some limitations due to extensive plant and energy centre located on the roof. Policy G5, Part A requires development proposals to use all available roof space to incorporate biodiversity-based extensive green roofs. As such, green roofs would need to be provided on any elements of the roof not covered by plant and this would be secured by condition.

9.625 Blue/green roofs have not been proposed on the pitched roofs of the refurbished existing historic buildings Holborn & Admin, Clerkenwell and Charterhouse which is acceptable given they are non-designated heritage assets.

9.626 It is noted that the rooftop planters will be interlinked and potentially irrigated using a rainwater harvesting system.

9.627 Further details regarding blue/green roofs and the irrigation/rainwater harvesting, including interlinked rooftop planters would need to be secured by condition. In addition, further details in relation to the green walls would also need to be secured by condition and the applicant would be required to demonstrate that vertical greening has been maximised as far as possible across the development site.

Urban Greening Factor (UFG)

9.628 Local Plan Policy G1, Part E states that major developments are required to conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology in the London Plan. Schemes must achieve an UGF score of 0.4 for developments that are predominately residential.

9.629 A number of biodiversity/greening improvements are proposed including the provision of green roofs, two green walls, semi-natural vegetation, 90 small trees, flower-rich planting, and an area of rain garden and hedges. An Urban Greening Factor (UFG) score of 0.5 has been achieved which exceeds the 0.4 target as required by policy for residential-led development.

9.630 However, the Arboriculture Officer has advised that the UGF calculations do not appear to take into account the proposed reduction in tree canopy size of the retained existing trees, required to prevent the proposed new buildings touching the existing tree canopies. The UGF is being calculated from existing tree canopy sizes, which would have to be pruned significantly smaller and their existing size would be considerably reduced and unlikely to recover to existing sizes.

9.631 Biodiversity Net Gain (BNG)

9.632 Under Schedule 7A of the Town and Country planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), development must deliver a BNG of 10%. Local Plan Policy G4 also requires states that development proposals must aim to secure a net gain in biodiversity value with a clear priority for on-site measures.

9.633 To address this requirement a Biodiversity Gain Plan has been submitted, which proposes an 8.54% biodiversity net gain. This falls short of the 10% biodiversity net gain requirement.

9.634 As a result, the applicant has explored offsite enhancement opportunities within Archway Park. The Biodiversity Gain Hierarchy states that all onsite habitats which are adversely affected by the development should be compensated by prioritising the enhancement of existing onsite habitats as a first step, followed by the creation of new on site habitats. All potential onsite measures must be exhausted before offsite opportunities can be considered.

9.635 Considering further on-site measure, as previously noted, it appears that further landscaping and planting could be incorporated into the development's landscape design and delivered on-site. There are expansive areas of hard landscaping across the site, particularly in the southern area of the site around the student accommodation and student amenity building, which could accommodate additional greening.

9.636 With regard to trees, which have a significant impact on BNG score, the development proposes the loss of four category 'B' trees, 17 category 'C' trees and four groups of category 'D' trees. The proposal seeks to retain all category 'A' trees, including those covered by a TPO. However, as noted in the 'Tree' section below, significant concerns have been raised regarding the cumulative set of damaging impacts that would result from the proposed development on retained trees, inclusive of

the mature TPO trees on the Highgate Hill boundary, and to a lesser extent, to the east on the east side of the site.

9.637 Furthermore, while 90 new trees are proposed to be planted, concerns regarding species, scale, lifespan and contribution to ecology have been raised, which further undermines their potential to contribute to BNG.

9.638 Given the above, which notes that there is opportunity to further review on site provision, the approach of exploring the offsite enhancement opportunity is not considered to be acceptable.

9.639 Notwithstanding this, the submitted Biodiversity Gain Plan does not include maps showing the existing and proposed habitats classified to the BNG Metric Habitat Classifications and no description of habitat parcels are given. There are mistakes in the metric, habitat parcel references are missing and condition assessment sheets have not been provided. Furthermore, the number of retained trees shown on the submitted maps does not concur with those within the report, notably T33-T36 are stated as being retained in the arboricultural report and in the BNG report, but T33-T36 are not shown as retained on the proposed map.

9.640 It has therefore not been possible to determine the baseline habitat units or whether the development would result in a net gain in Biodiversity Units, such that the Local Planning Authority are unable to determine if the biodiversity net gain condition is capable of being successfully discharged. The proposal would therefore be contrary to Article 7 of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021), the NPPF (2024) Section 15, London plan (2021) policy G6 and Local Plan (2023) policy G4.

Biodiversity and Landscaping

9.641 London Plan Policy G1 states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Policy G5 further states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

9.642 The site retains some fragmented areas of open space with 11 mature London plane trees to the western boundary with Highgate Hill, which are protected by a Tree Preservation Order (pre-dating the conservation area designation). There are also 4 mature London plane trees to the Archway Road side of the site, set back from the boundary wall and adjacent to the southern element of the administration block. All of the trees and vegetation on site are protected by virtue of their inclusion in the Holborn Infirmary Conservation Area.

9.643 Local Plan Policy G4 requires developments to enhance and contribute to the landscape, biodiversity value and growing conditions, including protecting and enhancing connectivity between habitats. Archway Park, which is designated as a Site of Importance for Nature Conservation (SINC), is located to the east of the site on the opposite side of the Archway Road. The application is required to demonstrate that it will not adversely affect the SINC and confirmation should be provided as to how the existing green infrastructure will be retained and managed and that the operation will not impact on the SINC.

9.644 Part F of Draft Local Plan Policy G4 states that all developments, including refurbishment works, must carryout out ecological surveys and assessments wherever the proposed development is likely to have an impact on protected species; habitats or priority species identified in the borough's Biodiversity Action Plan; and/or is either within or in close proximity to a SINC(s).

Ecology

9.645 The submitted Preliminary Ecological Appraisal report dates from January 2021, the Preliminary Roost Assessment dates from December 2021 and the Bat Survey report dates from July 2023. The Council's Ecological consultant has advised that these are based on outdated data and therefore the findings and recommendations cannot be relied upon. This is further reinforced by the Chartered Institute of Ecology and Environmental Management, who have issued an advice note on the lifespan of ecological report and surveys. These recommend that a survey report less than 12

months old is likely to be valid in most cases; reports 12-18 months old are likely to be valid with some exceptions; reports 18 months to 3 years old require a site visit plus consideration of repeating the surveys and reports older than this are likely to require most of the surveys to be repeated.

9.646 Given the extensive passage of time, which exceeds 3 years for the two preliminary assessments and 19 month for the Bat Survey Reports, the conclusions and results obtained from these reports could now be inaccurate, as conditions on the site could have changed during this period and the site could, as a result, have become more suitable for use by protected species. Therefore, updated surveys would be required prior to the determination of this application in order to determine the likely impact of the proposals upon protected species and ensure appropriate mitigation can be provided. Further surveys may then be required.

9.647 In addition, it is noted that Archway Park, a Site of Local Importance for Nature Conservation (SINC), lies 50m east of the application boundary and the proposal could result in an indirect negative impact on this SINC due to increased recreational use. This would also need to be addressed as part of an updated assessment.

9.648 The Landscape and Public Realm Statement refers to a lighting strategy, although further detail has not been provided at this stage. As stated within the Bat Survey Report, a sensitive lighting regime must take into consideration the impact it might have on bats (during both the construction and operational phase of works). If minded to approve, details of a lighting scheme would be secured by condition.

9.649 In the absence of an up-to-date Preliminary Ecological Assessment, Preliminary Roost Assessment nor Bat Survey Report the application fails to demonstrate that the proposal would not have an adverse ecological impact on protected species and local biodiversity. As such, the proposal is contrary to section 15 of the National Planning Policy Framework, London Plan Policy G6 and Local Plan (2023) policy G2 and G4

Trees

The Tree Survey and Arboricultural Report records that there are currently 39 individual trees and 4 groups of trees on site. This includes 11 ‘category A’ mature London plane trees to the western boundary with Highgate Hill, which are protected by a Tree Preservation Order. There are also 5 ‘category A’ mature London plane trees to the Archway Road side of the site, set back from the boundary wall and adjacent to the southern element of the administration block. All of the trees on site are protected by virtue of their inclusion in the Holborn Union Infirmary Conservation Area.

9.650 The Tree Survey and Arboricultural Report sets out that the proposed development would result in the loss of 21 low quality trees and 4 moderate quality trees. All category A trees, including those to the Highgate Hill and Archway Road edges of the site would be retained in the development. The tree strategy information set out in the Landscape Statement contradicts the this slightly and sets out that a total of 24 trees would be removed, including the loss of a ‘category A’ Tree number 4 on Highgate Hill, to facilitate the reconfigured entrance from Highgate Hill.



Figure 85: Existing tree strategy diagram as set out in the Landscape Statement.

Root Protection

9.651 In terms of root protection, the Arboricultural Officer has advised that it is accepted (as per previous site investigations) that the location of the proposed sheet piling within the Root Protection Area (RPA) of trees would be acceptable (harm to tree roots is expected to be tolerable). However, the proposal would require an extensive reduction in the ground levels across the site, which would necessitate excavation within the retained (TPO) tree RPAs of almost 1m between T8 and T9 for new entrance, up to 1.9m between T3 and T5, and almost 0.5m alongside T33 – T36. Together with the incursion into the RPAs for the sheet pile foundations, this is unacceptable and would result in significant damage and harm to existing tree roots of the above identified trees, detrimentally affecting physiological tree health and in the case of trees T3, 5, 8 and 9, potentially their stability adjacent to a busy highway.

9.652 In addition, the Arboricultural Officer has highlighted that further damage/severance of tree roots to all these significant TPO trees would be caused if further excavation is required to lower the ground level along the proposed 'woodland walk' footpath that runs alongside trees T1 – T12.

9.653 Concerns have also been raised with the proposed installation of concrete play elements beneath mature trees and new trees. The proposed elements are very extensive, with regard to relative area, and will result in significant damage to tree roots of existing trees (further cumulative root damage to the TPO Plane trees on Highgate Hill), and a restricted root environment of proposed new trees.

Canopy Protection

9.654 It is advised that the above ground constraints of the trees have not been adequately taken into consideration and concerns have been raised by the Arboricultural Officer that Block A, B and Block C would be located in too close proximity to the mature TPO Plane trees along the Highgate Hill boundary with the new buildings touching the trees or within the existing tree canopies. As a result, there are concerns that seasonal debris (leaves, seed balls, small twigs) and other 'tree nuisance' (insects and safety perception) would be a significant problem to future residents, including 'Plane dust' (small fibres found on the underside of the leaves that are shed typically in the Summer months) which would cause nuisance and possibly irritation to any residents. These potential impacts would be exacerbated given that the windows and balconies would open directly into the tree canopy and would likely be used more in the summer months when the trees are shedding 'Plane dust'.

9.655 The Arboricultural Officer has advised that in order to facilitate the proposed construction of the new blocks, and to achieve adequate separation of the existing tree canopies from the building, the TPO trees would need to be pruned significantly beyond what would be considered arboriculturally acceptable, and therefore damaging to their physiological condition, long-term amenity and eco-

system service provision. Even if the tree canopies are pruned, within only a couple of growing seasons the trees will be touching the building again.

Proposed Tree Planting

9.656 The Landscape Statement states that the proposal would provide some 90 new trees across the site in addition to those retained.

9.657 The Arboricultural Officer has advised that the proposed tree species palette is poor and does not adequately consider climate change adaption. In addition, no large species of tree have been selected which would provide the most eco-system service benefits and amenity and it is council policy to plant large tree species where space allows. In this instance there is considered to be adequate space for numerous large trees species to be planted.

9.658 The Arboricultural Officer has also raised concerns that the proposed 'birch grove' to the southern apex of the site would not be a suitable species. This is because birch trees, and in the numbers proposed, would be poor for sustainable climate adaption (including temperature, pest and disease tolerance) and have a short life span, with a small tree size and the wrong growing habit if the intention of it is to offer shade.

9.659 The Arboricultural Officer has advised that all proposed tree planting appears to be 'semi-mature' nursery stock and notes that it is difficult to establish new tree planting in this larger stock size. Whilst some specimen trees in prominent locations could be this size, to achieve an immediate impact, most tree planting should be a smaller stock size to give the best chances of establishment and survivability. All tree planting would be required to achieve adequate soil volumes for the tree species proposed and thereby require modern tree pit design, incorporating underground crate systems, and likely soil replacement. Tree planting pits should be ideally linked, which doesn't appear to be the case in all situations in the proposal.

Trees - Summary

9.660 The existing constraints of retained trees, including those that have a TPO, have not been adequately considered leading to objections from the Arboricultural Officer. It is advised that the proposal would result in a cumulative set of damaging impacts that would cause significant harm to the existing TPO trees along the Highgate Hill boundary, and to a lesser extent to the trees on the East side of the site, detrimentally effecting their long-term viability, amenity and eco-system service provision.

9.661 The proposed landscape scheme, with regard to its impact on existing trees, and the new tree provision, has several poorly considered elements, and would require significant enhancement to become acceptable.

9.662 This development proposal is therefore considered to be contrary to Local Plan policies G1 and G4 and would result in a net deficit of the valuable eco-system service provision the trees provide and would therefore also be contrary to the Council's commitment to climate change adaption, and this weighs negatively against the scheme in the balance.

STRUCTURAL METHOD STATEMENT

9.663 The proposal would incorporate substantial basement areas throughout the development by enlarging and creating new basement levels. This includes a basement level for the student block to accommodate a gym, cinema, bin store and plant room.

9.664 London Plan Policy D10 Basement development set out that Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally. Islington has set out this policy in Local Plan Policy DH4: Basement Development.

9.665 Policy DH4 states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause an unacceptable degree of harm to: (i) the structural stability of the existing building, nearby buildings, trees and any infrastructure; (ii) the structural, ground, or water conditions of the area; (iii) the architectural character of the building; (iv) the character and amenity of the area; or (v) the significance of heritage assets including conservation areas and listed buildings. Applicants proposing basement development must provide evidence of the impact of basement development in the form of a Structural Method Statement (SMS), which satisfies the criteria in Part B.

9.666 Appendix B of Islington's Basement Development (2016) SPD sets out guidance for the drafting of the Structural Method Statement. This document sets out that for all basement development a Structural Method Statement (SMS) must be submitted (in accordance with the SMS requirements in Appendix B) in support of any such application, and this must be signed and endorsed by a Chartered Civil Engineer or Chartered Structural Engineer with relevant experience, appointed by the applicant.

9.667 A Structural Method Statement was not submitted by the applicant and was requested by officers. At the time of writing this report this had not been submitted. A Structural Commentary document was submitted by the applicant (Revision 2, prepared by SBK), however this does not contain the level of information on the basement development as required by policy.

9.668 A Structural Method Statement was not submitted by the applicant and was requested by officers. At the time of writing this report this had not been submitted.

9.669 This document is particularly important for this site due to the heritage setting and assets of the site. The absence of this being provided to officers during the assessment of the application means officers have not been afforded the opportunity to assess the proposal against Local Plan Policy DH4. The proposal to failed to demonstrate to the satisfaction of the Local Planning Authority that the proposed basement areas would not cause an unacceptable degree of harm in line with the criteria set out in Local Plan: Strategic and Development Management Policies (2023) DH4 part B and Islington's Basement Development SPD (2016).

HIGHWAYS AND TRANSPORT

Policy Context

9.670 Policy T4 of the London Plan 2021 states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. A Transport Statement should be submitted with development proposals to ensure that impacts on the capacity of the transport network are fully assessed. Furthermore, part C of this policy states that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

9.671 Local Plan Policy T1 requires all development proposals must take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling (known as active travel), and to prioritise practical, safe and convenient access and use by sustainable transport modes. Part D of the policy requires all new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Policy T3 requires all new development to be car free.

9.672 Local Plan Policy T2 states that development proposals must mitigate against negative impacts on safe, sustainable travel choices. Furthermore, the proposed development must provide all pedestrian and cycling infrastructure and facilities and to design these in such a way that they are in accordance with the relevant guidance. Cycle parking should be provided in accordance with the standards set out in the Development Plan including the London Plan and provide also for accessible cycle parking.

Site Context – Highways and Transport

9.673 The site is located between Archway Road (A1) and Highgate Hill, with the southern apex of the site meeting where these two roads join at Tollhouse Way. Archway Road (A1) is a main distributor road within Islington and forms part of the Transport for London Road Network (TLRN).

9.674 There is an existing vehicular access point from Highgate Hill and two existing vehicular access points from Archway Road, which are linked by a servicing road running east to west through the northern part of the site. It is intended that the site would be serviced from Archway Road.

9.675 The site is currently bounded by a wall and perimeter fence and whilst there is pedestrian access into the site there are no public routes into or through the site.

9.676 The site has excellent access to public transport and has a Public Transport Accessibility Level (PTAL) of 6a/6b, which is the highest rating. The closest Underground station is Archway, located to the south of the site on the opposite side of Navigator Square and provides access to the Northern

Line. The closest bus stops to the site are on Highgate Hill immediately outside the site, with bus routes to Brent Cross Shopping Centre, Finsbury Square and Harringay. The closest Overground station to the site is Upper Holloway Station situated 550m southeast of the site off Holloway Road, with services running to Gospel Oak and Barking.

Proposed Vehicle Access

9.677 It is proposed that vehicular access to the site will be achieved from an existing access point on Archway Road (A1) located along the site's eastern boundary. This access would form a left in only junction for vehicles travelling northbound along Archway Road (A1). Vehicles would egress the site onto Highgate Hill via an existing access in the form of a priority junction. Vehicles would be able to turn left and right out of this egress point onto Highgate Hill. It is noted that the proposed access arrangements are in-line with historic and existing arrangements for the site.

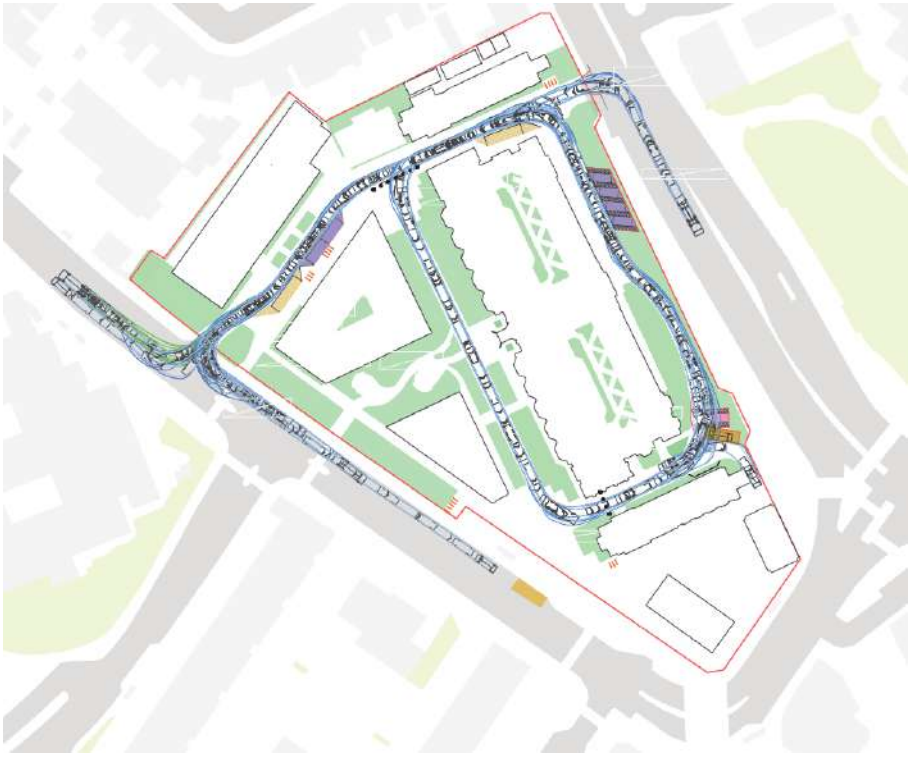


Figure 86: Proposed tracking, parking, loading bay and vehicle access diagram.

9.678 Within the site an internal vehicular route would be set out, including a link between the two vehicular access points on the eastern and western boundaries. This aspect of the internal vehicular route would be one way, travelling from east to west. A vehicular loop road would also be present that would enable the southern aspects of the site to be serviced.

9.679 The loop road would incorporate a traffic free aspect which would only be accessible to refuse and emergency vehicles. The traffic free 'central spine' would have a shared surface to ensure that it remains pedestrian and cycle friendly. Access to the central spine of the site would be controlled to the north and south with measures such as bollards. This aspect of the internal vehicle routes would also be one way with vehicles travelling southbound meaning that refuse vehicles complete the southern internal loop road in an anticlockwise direction.

9.680 The remainder (eastern side) of the southern loop road would also be accessible to servicing vehicles, such as delivery vehicles. Such vehicles would enter the site from the east before immediately turning left to travel to the southern end of the site and the most southerly loading bay. These vehicles would then travel northbound back towards the northern eastwest road. The turning manoeuvre would be completed using either the turning head or loading bay.

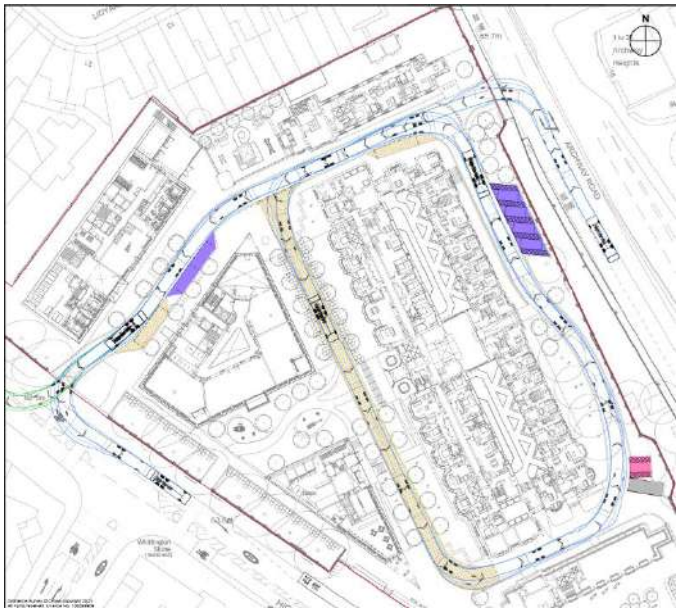


Figure 87: Swept path analysis of an 11.2m refuse truck using the proposed central loop

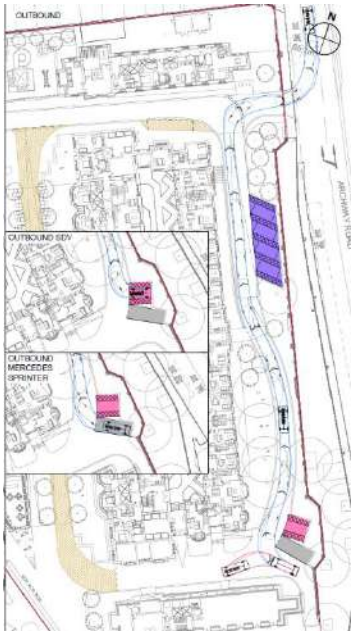


Figure 88: Swept path analysis of a Mercedes Sprinter van on the proposed eastern service road

Proposed Emergency Access

9.681 Emergency vehicles would be required to utilise the vehicular access points and within the site, would travel along all the internal roads, including the traffic free spine road. The applicant sets out that internal roads are at least 3.7m wide, which is the minimum width to accommodate emergency vehicle access.

9.682 In addition, it is intended that emergency vehicles would service the south of the site from Tollhouse Way, exiting the carriageway and utilising the area of public realm to the south of the site to park whilst servicing the site.

Proposed Pedestrian Access

9.683 Pedestrian access would be achieved from numerous locations along Highgate Hill and Tollhouse Road, with an additional access point located along Archway Road. Towards the southern end of the site, pedestrian access would be achieved through the proposed area of public realm. This area of public realm would accommodate pedestrian movements at the southern end of the site and between the site and Archway centre to the south.

Proposed Cycle Access

9.684 Along with pedestrians, cycles would be able to access/egress the site via the proposed vehicular access and egress points located along Archway Road and Highgate Hill. Cyclists would also be able to access the site from the proposed area of public realm to the south of the site.

Transport for London Road Network (TLRN) impact

9.685 Transport for London (TfL) have advised that the changes proposed to vehicle access on Archway Road (A1) would protect and maintain existing cycleway and bus infrastructure which is welcome. However the exact works and impact on the connected TfL-operated highway must be further clarified. Should the new highway access from A1 require adjustments to the public highway boundary or works within the TLRN red route boundary, these works must be funded and delivered by the applicant via S278 agreement.

9.686 A s106 clause securing a s278 agreement with TfL should therefore be secured for any future development scenario. The full scope of TLRN highway works should be agreed with TfL prior to determination.

9.687 Permanent public access to all new public realm areas proposed within the site should also be secured in perpetuity for both pedestrians and cyclists.

Highgate Hill impact

9.688 All servicing should take place within the site to ensure compliance with Local Plan Policy T5 and London Plan Policy T7 Part G. However, the proposal includes the creation of a new 12 metre servicing bay for refuse collection, outside of the site on Highgate Hill, which would require the relocation of a TfL bus stop (Archway Station -Stop C) some 13m north along Highgate Hill. It is proposed that refuse vehicles would access the bay by crossing the bus lane immediately in front of the bus stop road markings.

9.689 TfL Officers, LBI Highways Officers and Highways Consultants Steer share concerns that the proposed new loading bay would result in conflict between buses and loading vehicles and that vehicles would have to give way to one another when arriving or leaving simultaneously. It is also highlighted that loading vehicles using the proposed loading bay may not always be carrying out refuse collection, depending on future Traffic Order controls, which may be difficult to practically enforce. In addition, the new loading bay would introduce a highway safety risk from servicing or delivery vehicles travelling up Highgate Hill and turning right to get to the loading bay across the south bound lane, holding up traffic and creating a road safety hazard. There is also concern that the loading bay would get used for illegal parking/ temporary parking/ vehicles waiting, which could be exacerbated by waiting delivery drivers particularly given the proximity of the nearby McDonald's fast food outlet on the opposite side of Highgate Hill.

9.690 The proposal could therefore rely a great deal on stringent future enforcement by the Council and it is not currently supported by the Council and TfL in strategic transport terms. The need for separate vehicular access provision on the west in addition to both the north and east sides of the site seems questionable considering proposed provision of 6no. Blue Badge disabled car parking bays, emergency vehicle and cycle access through the central public realm spine, and the site's large overall size.

9.691 Whilst basic vehicle manoeuvring analysis drawings for the proposed Highgate Hill loading bay have been provided in the Transport Assessment, it requires a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination. The RSA is required to follow TfL's SQA-0170 - May 2014 procedure. The RSA and Designer's Response would require sign-off from TfL. At the time of writing this report details of a Stage 1 Road Safety Audit had not been provided by the applicant.

9.692 Technical assurance of the proposed design by TfL Engineering is also required prior to determination, at the applicant's expense, to ensure compliance with the TfL accessible Bus Stop design guidance. TfL have advised that it would be sensible to carry this out after the RSA work, on a more finalised design proposal. This work would inform the scope of local Section 278 (S278) works agreed secured via condition or Section 106 (S106) obligation.

9.693 TfL have advised that significant further engagement would be required on this matter. The applicant would need to demonstrate that the loading and access proposed could be safely delivered without increasing road danger or causing unacceptable impacts on bus operations. The loading design and capacity must also prevent misuse such as informal ranking by taxi or private hire vehicles and ensure no future queuing or waiting by vehicles on the footways or in the bus lane. This is especially important to ensure compliance with Policies T3 part E and T4 and having regard to the gradient of the highway and forward visibility for servicing vehicles and passing buses.

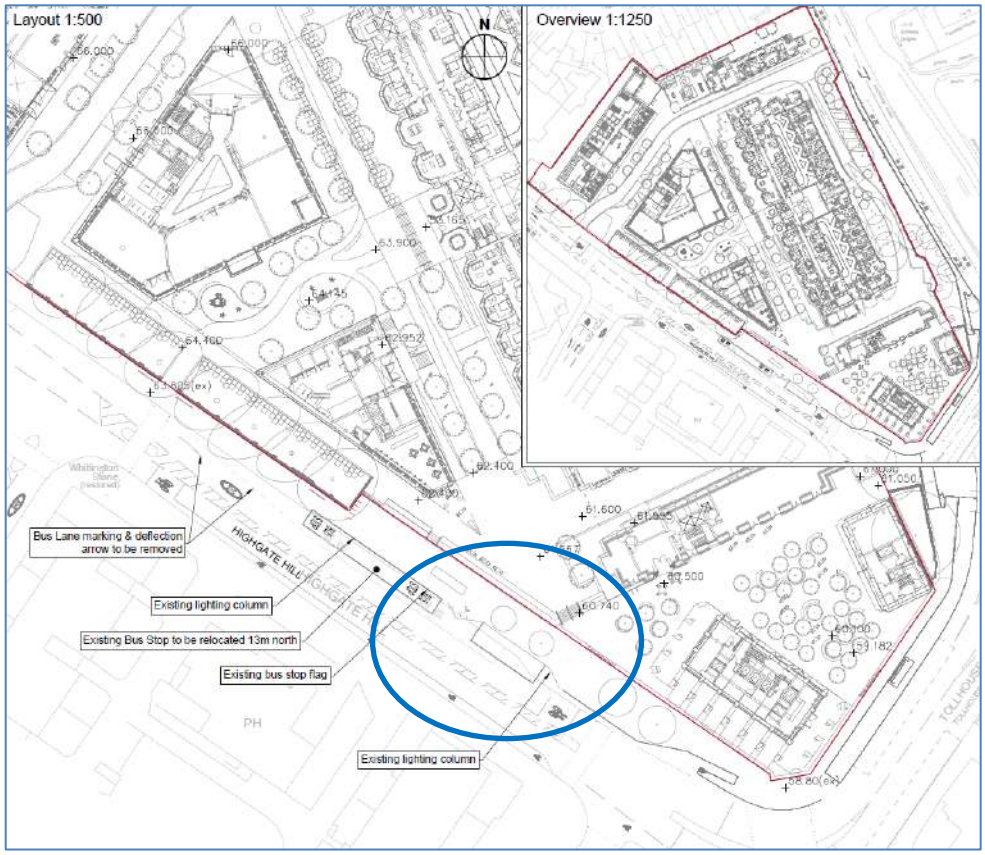


Figure 89: Proposed loading bay (circled in blue) at Highgate Hill



Figure 90: Existing TfL bus stop (Archway Station - Stop C) at Highgate Hill looking south towards Navigator Square *(Image: Google Streetview, dated July 2024)*

Buses

9.694 TfL have advised that existing local bus lanes, stops and stands on Highgate Hill and Archway Road must not be disrupted during construction or in the final permanent highway arrangement.

9.695 TfL have commented that the surrounding area's strong bus provision can likely accommodate new two-way bus trips expected to be generated by the development during AM and PM peaks. However, this is contingent on robust sense checking of the TA prior to determination and TfL maintaining and enhancing local bus priority and operational infrastructure.

9.696 TfL officers have advised that in general, TfL will not agree to any bus stop changes that have a detrimental impact on bus operations. This is because the operation of the bus network is sensitive to marginal changes in bus infrastructure, which can cause delays that in turn increase operating costs. TfL may request traffic modelling to demonstrate proposed changes affecting bus infrastructure would not reduce the operability and accessibility of affected stops and services using them, for example by creating significant bus delays, which would require financial mitigation if identified. The need for traffic modelling will be subject to the findings of other technical checks that have been requested from the applicant.

Active Travel Zone Assessment

9.697 The Transport Assessment is supported by a day time Active Travel Zone (ATZ) assessment of walking routes from the development site to key local destinations. TfL have advised that the findings of the submitted ATZ assessment are acceptable on balance despite no significant highway improvements being proposed in the TA, considering the high quality of surrounding street conditions following TfL's recent improvement scheme.

9.698 Contributions would be sought to address the deficiencies identified and the Council would secure any local highway improvements deemed necessary to make the development acceptable in planning terms.

9.699 TfL have advised that a nighttime ATZ focused on ending violence against women and girls must also be carried out, addressing the 'people feel safe' Healthy Streets indicator as required by London Plan Policies T2 and D8.

9.700 TfL officers have also advised that the Council should secure additional s106 funding or commit local Community Infrastructure Levy (CIL) funding to any safety improvements identified in the night ATZ.

Car Parking

9.701 Local Plan Policy T3 Part A states that all new developments will be car free. Part B of the policy states that vehicle parking or waiting for essential drop-off and accessible parking will be permitted for new homes. This does not include applications for vehicle parking within a site, the planning unit and/or within the curtilage of existing residential properties, including any undercroft or basement parking. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes. This aligns with the London Plan (2021) parking policy.

9.702 Local Plan Policy T3 Part G states that for residential proposals accessible parking spaces must be provided based on 10% of the total residential units/bedspaces proposed. The cost of provision of parking spaces will be secured by a Section 106 legal agreement to enable the Council to install the accessible parking spaces as and when demand materialises from Blue Badge occupiers/employees. Spaces will generally not be required to be physically provided where this demand has not materialised. Where it is not possible to deliver designated spaces on street, for example due to insufficient space or issues with amending Traffic Management Orders, a financial contribution should be made towards investment in other accessible or sustainable transport initiatives where appropriate.

9.703 As existing, the site accommodates approximately 80 car parking spaces located in various locations across the site within marked bay car parks and areas of hardstanding, left over from its previous use as a teaching hospital. The proposal would not retain this level of parking provision and the supporting documents state that the proposed development would be car free except for seven 'Blue Badge' accessible parking spaces – including six spaces associated with the residential use and one space for the student accommodation.

9.704 Four of the residential accessible spaces would be located next to the eastern boundary in front of the Admin building. The Council's Highways consultant has raised concerns that manoeuvring into the northernmost space would be tight and due to their alignment would need to be driven into in a forward gear, with these drivers then having to travel southbound to turn around to then exit the site. Swept path analysis diagrams for these spaces would need to be provided by the applicant to demonstrate their acceptability.

9.705 A further two residential accessible spaces would be located on the east west service road between Block A and Block B. The Council's Highways consultant has raised concerns that any passengers accessing from the passenger side of the car could be impeded by cycle stands/ trees and that the final details for these two spaces should be given further review.

9.706 The accessible parking space for the student accommodation would be located adjacent to the eastern boundary opposite the southern end of the Admin building. There are concerns that due to the proximity of this space to the service road bend, a vehicles parked in the space could impede access.

9.707 All vehicular parking spaces would be required to be provided with electric vehicle charging points from the outset and this would be secured by condition.

9.708 In terms of the locations of the proposed accessible spaces the Applicant has not demonstrated that all building entrances are within 50 metres of a Blue Badge parking space.

9.709 In terms of the quantum of spaces, the scheme provides the minimum requested number of Blue Badge spaces to meet London Plan Policies T6 and T6.1 (3% provision for residential units). However, the scheme does not demonstrate how it would meet the Local Plan minimum requirement for 10% provision of Blue Badge spaces (Policy T3 Part G). The applicant contends that this level of car parking is not deemed to be necessary for the site considering the sites location in an area of PTAL 6a/6b and that the provision of additional car parking spaces would also reduce the area available to be used as public realm, which would be detrimental to encouraging active travel at the site. This is not considered to be an adequate justification, and further evidence would be required particularly with regards to why this level of provision would not result in requests for Blue Badge permits on surrounding streets. Addressing this issue may require other areas of the site to be safeguarded for conversion to Blue Badge parking at a later date and should be set out on a drawing as part of the submission documents.

9.710 The requirement for the applicant to identify a location for a Car Club space on surrounding streets would be secured by condition.

9.711 In terms of the impact on parking in the areas surrounding the site, applications from future residents of the development for on-street car parking permits in the surrounding CPZ would be restricted through a S106.

Cycle Parking

9.712 In terms of cycling, London Plan Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. It should also secure appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

9.713 Local Plan Policy T2 requires all new development in Islington to incentivise walking and cycling. The proposed development as highlighted above, through creating new travel routes, increasing permeability and facilitating easy movement through the site is considered to make a positive contribution in this regard. The site's proximity to a Strategic Cycle Route provides a significant opportunity to promote travel by bike, something which the proposed improvement to the site's permeability helps to support.

9.714 More specifically, Part E(iii) of Policy T2 sets out the requirement to provide cycle parking in accordance with Appendix 4 of the SDMP. The required level of cycle parking as relevant to the proposed development is set out in table below:

Use Class	**Spaces per member of staff or resident (GEA) of which 20% accessible (long-stay)**	**Spaces per visitors or customers (GEA) of which 20% accessible (short-stay)**
C3-C4 Housing	• 1 per studio or 1 person dwelling • 1.5 per 2-person 1 bedroom dwelling • 2 spaces per all other dwellings	5 spaces per 40 dwellings: thereafter: 1 space per 40 dwellings
Student Accommodation	0.75 spaces per bedroom	1 space per 40 bedrooms

E(b) Restaurants and cafés	1 per 175sqm	Developments above 100sqm: 1 space per 20sqm

9.715 The proposed cycle parking provision is set out in the table below:

Table 5.1: Proposed Cycle Parking

Use Class	Building	Long Stay	Short Stay
PBSA (Sui-generis)	Clerkenwell	24	1
	Student Tower	158	5
Commercial		1	2
Residential (Class C3)	Admin	30	1
	Holborn	113	2
	Charterhouse	21	1
	Block A	53	1
	Block B	71	1
	Block C	28	1
Commercial		1	4
Total		**498**	**19**

9.716 In accordance with the policy requirements, the level of cycle parking provision required for the proposed development equates to 498 long-stay cycle parking spaces and 20 short-stay parking spaces. Supporting paragraph 6 of Appendix 4 is clear in confirming that with regard to long-stay cycle parking 20% accessible cycle parking spaces must be provided, 25% of which must be designated for non-standard cycles and 75% for ambulant disabled cyclists using regular cycles. This translates into a requirement for 100 accessible cycle parking spaces, 25 of which being for non-standard cycles and 75 for ambulant disables cyclists using regular cycles.

9.717 The Transport Assessment confirms that 498 long stay spaces would be provided throughout the site within the various buildings. The inclusive design officer has provided an assessment of the suitability of the cycle parking arrangements as relevant to the long stay provision proposed and raised no objections.

9.718 Supporting paragraphs 14 and 15 of Appendix 4 set out the requirements as relevant to the provision of short-stay cycle parking. Short-stay cycle parking must be provided off the public highway or where this is not possible, it may be appropriate to within the public realm if other policy requirements are addressed. It must be easy to find and located close to main access roads and building entry/exit points.

9.719 It is proposed that 19 short-stay spaces would be provided and located throughout the site at various points within the public realm in relation to entrance points and existing cycle infrastructure. The proposed location for the proposed short-stay spaces is shown on the Landscape General Arrangement Plan, with Sheffield Stands proposed at 4 locations throughout the site, which are considered to be logical locations positioned in proximity to key entrance points into the site.

Public Transport

9.720 Part F(ii) of Policy T2 sets out the Council's ambition to "Create and enhance the public realm around bus and rail stations to improve pedestrian/public transport user and cycling experience." Notwithstanding the harm to heritage assets outlined in this report, the proposal is considered to make a positive contribution in this regard, opening up the southern part of the site, facilitating a better connection between the site and the transport facilities in the Archway Town Centre, including the Underground Station.

9.721 Deliveries and **Servicing**

9.722 Local Plan Policy T5 states that delivery and servicing plans are required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans must demonstrate how safe, clean and efficient deliveries and servicing have been facilitated and any potential impacts will be mitigated.

9.723 The application submission includes a delivery and servicing management plan and sets out that the majority of vehicles servicing the site, including delivery vans, cars and motorcycles would use the three loading bays set out along the length of the main east-west service road. An additional servicing bay is also proposed outside of the site along Highgate Hill to service the residential Block C and Student tower block. As set out in the previous section servicing from Highgate Hill would be problematic and would interfere with bus operations, so this is not supported by the TfL and Council Officers. All servicing should take place within the site to ensure compliance with Local Plan Policy T5 and London Plan Policy T7 Part G.

9.724 The servicing trips associated with the proposed development are set out in the delivery and servicing management plan as follows:

Use Class	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily (06:00-21:00)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
Residential	2	1	3	2	1	3	31	31	61
Student Accommodation	0	0	0	0	0	0	6	6	13
Commercial/Retail	0	0	0	0	0	0	3	2	5
Total	2	1	3	2	2	4	40	39	79

9.725 The site is forecast to generate 3 to 4 servicing trips during the AM and PM peaks respectively, with circa 79 trips generated over the course of a typical day which would be undertaken by 40 vehicles. In terms of vehicle types, servicing is anticipated to be undertaken by a mix of light goods vehicles, cars and motorcycles. Given the location of the site, it is also forecast that a proportion of deliveries undertaken by motorcycle or electric bicycles will be undertaken for food deliveries.

9.726 There are concerns over the operation of the servicing access loop, particularly the eastern side where two-way service vehicle movements are proposed as there would be limited space to support two-way movements (passing) of vehicles, which could result in some vehicles waiting at the northern end of the route, near to the Archway Road vehicular access. If this involved multiple vehicles this could potentially lead to blocking back onto Archway Road.

9.727 Limited details have been provided on how access to the site would be controlled at both the eastern and western end of the vehicle access points to prevent unauthorised vehicles accessing the site or using the east west servicing route as a rat run. Clarification is required on whether there is proposed to be a gate/ barrier/bollard at either end of the east-west route, and how will this be controlled. The associated location at the eastern end of the route requires clarification as it will need to be inset sufficiently to allow an entering vehicle to wait off the public highway (whilst access credentials are checked) to prevent backing up on Archway Road and adverse impacts on the cycle route, buses and other traffic.

9.728 In addition, the width of the Archway Road vehicle crossover would be reduced compared to existing, despite the development access being proposed to accommodate entry and exit movements for some vehicles. There are concerns this could also delay some vehicles entering the site.

Waste Management Strategy

9.729 It is proposed that refuse collection would be undertaken on site and from Highgate Hill. A refuse collection vehicle would access the site from the access on Archway Road and route through the site. Refuse vehicles would be granted access to the traffic free central spine road and travel in an anticlockwise direction around the loop road within the site.

9.730 Refuse collection would also be undertaken from the proposed loading bay located on Highgate Hill. The swept path analysis drawing at Appendix D of the Transport Statement shows that an 11.2m refuse could access and egress this bay in forward gear. Bins that are located outside of recommended drag distances would be moved by on-site management to a temporary store location on collection days. Once collected these bins will be returned to their original stores.

9.731 Islington's Waste and Recycling service have raised no objections to proposal, subject to further details in relation to bins that would be presented on sites over 10metres. In the event that the application were to be approved this would be secured by condition.

Student Access Management

9.732 No details have been provided in relation to the management strategy for student pick-up and drop-off, to ensure this activity will not unduly affect on-site circulation. A Student Pick-up/ Drop-off strategy would be secured by condition.

Construction

9.733 Clarity is required on the construction phasing, and if the development is to be built out by phase with initial phases being occupied prior to later phases of the development being completed.

9.734 The submitted Construction Logistics Plan (CLP) although outline is not detailed enough and is therefore not in accordance with TfL/ CLOCS CLP Guidance. Important information has not been included, as set out below:

- Key local considerations and challenges need to be set out, including sensitive land uses and key facilities such as the cycle route/ bus stops etc on Archway Road.
- Indicative site layout plans should be provided setting out the key transport information and access strategy.
- Exact impact on local highways needs to be identified including on existing cycle infrastructure and bus stops.
- The TA and CLP state that forecast timescales are not confirmed. An indicative construction programme is required by Phase and should be provided at this stage.
- There are no forecast construction vehicle numbers in the CLP. Given the sensitivity of the site, proximity of local buses and the cycle route to the east of the site, initial forecasts should be provided at this stage with these linked to the construction phases.
- Mitigation measures should focus on key considerations such as reducing impacts by all modes on surrounding roads, including cycle routes. If the development will involve phased occupation, measures will be required to set out how access will be managed for occupied buildings prior to the wider construction works completing.
- Details to be secured by S106 but expected to include restrictions on traffic movements on surrounding highway network during AM and PM peak periods.

9.735 A detailed final Construction Logistics Plan (CLP) would need to be secured by pre-commencement condition and discharged in consultation with TfL due to the site's proximity to the TLRN. TfL officers have advised that due to the complexity of surrounding strategic highway infrastructure and segregated cycleways, no construction access points or proposed arrangements should be considered finalised or agreed in principle by TfL at determination stage in this case.

9.736 The applicant should implement measures to mitigate potential impacts on cyclists and commit to adoption of the Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) standards.

9.737 It is crucial to maintain high-quality, safe pedestrian and cycling access around the site throughout all construction phases. Further analysis and design work may be necessary to clarify the operational and safety impacts on adjacent local and strategic highways once more detailed construction proposals are submitted.

TfL Infrastructure protection

9.738 The application site is within close proximity of London Underground and other TfL infrastructure. TfL have advised that conditions would be required to mitigate any construction and structural impacts on the public transport network. Bespoke infrastructure protection provisions may also be required in the S106 and S278 agreements.

FIRE SAFETY

9.739 Policy D12 of the London Plan states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.

9.740 Paragraph 3.12.1 of the London Plan states that: *"The fire safety of developments should be considered from the outset… How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using".*

9.741 Paragraph 3.12.2 of the London Plan states that: *"The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole."*

9.742 Paragraph 3.12.8 of the London Plan states that: *"Policy D5 Inclusive design requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. In all developments where lifts are installed, Policy D5 Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Fire evacuation lifts and associated provisions should be appropriately designed and constructed, and should include the necessary controls suitable for the purposes intended"*.

9.743 Part B of Policy D12 states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed.

9.744 Fire Statements should contain: the building's construction; means of escape for all building users; features that reduce the risk to life; access for fire service personnel and equipment; provision for fire appliances; and future modifications to the building.

9.745 The application is supported by a Fire Statement and a Fire Statement Form, prepared by Hydrock (dated 26 July 2024), who are considered to be suitably qualified independent assessor. The fire strategy provides details on the building's construction; means of escape for all building users; features which reduce the risk to life; access for fire service personnel and equipment; provision for fire appliances to gain access; and consideration of potential future modifications to the building in accordance with the criteria set out at London Plan Policy D12.

9.746 Block A, the student accommodation tower and the Holborn Union building would comprise of residential accommodation with a floor height above 18 metres. These buildings would have at least two stair cases (three stair cases in Holborn Union). As confirmed within the fire statement, the top habitable floor in Blocks B and C, the student amenity building, Clerkenwell building and Charterhouse building would be under 18 metres and would have a single stair case. Evacuation lifts are also provided to all buildings.

9.747 The 7 storey Block A would be served on all storeys by two stair cores: an evacuation stair and a firefighting stair (part of firefighting shaft). The firefighting shaft would contain: a firefighting stair, a firefighting lift, smoke ventilated firefighting lobby, and a dry riser within the stair. Additionally, each core would be provided with an evacuation lift. The 27 storey student accommodation tower would be served on all storeys by two firefighting shafts. Each firefighting shaft would contain: a firefighting stair, a firefighting lift, smoke ventilated firefighting lobby, and a wet riser within the stair. Additionally, one firefighting shaft would be provided with an evacuation lift. The Holborn Union Building, which

would have up to 7 storeys, would be served on all storeys by three firefighting shafts. Each firefighting shaft would contain: a firefighting stair, a firefighting lift, an evacuation lift, smoke ventilated firefighting lobby, and a dry riser within the stair. All the other buildings would be served by a single protected/evacuation stair core provided with a dry riser.

Fire Statement Review

9.748 The Health and Safety Executive (HSE) have reviewed the proposal and advised that they are content with the fire safety design as set out in the description, to the extent it affects land use planning considerations. However, the HSE has identified matters that the applicant should try to address in advance of later regulatory stages, including the following matters:

Computational Fluid Dynamic (CFD) modelling analysis:

- Section 7 of the Fire Statement identifies the use of Computational Fluid Dynamics (CFD) analysis and states: "Several stair lobbies feature mechanical smoke shafts and as such, CFD analysis will be required, with the results subject to agreement with the approving authorities." The HSE state that this is noted, however, if the CFD analysis does not support the design, and this may have an affect on the design, layout, and number of dwellings of the development and it will be for the applicant to demonstrate compliance at later regulatory stages.

Means of escape – cooking facilities:

- Section 7 also states: "The open-plan apartments which exceed the dimensions outlined in Clause 9.7 of BS 9991:2015, may be considered reasonable subject to agreement with the approving authorities. It is recommended that cooking facilities be located 1.8m away from escape routes within the units. Where this is not practicable radiant heat analysis will be required to demonstrate compliance with Functional Requirement B1."

- Fire safety standards state that: "the kitchen should be enclosed in open-plan flats having an area exceeding 8m × 4m. Cooking appliances in open-plan flats having an area smaller than 8m × 4m should not be adjacent to the entrance of the flat". Cooking facilities should be located at the most remote part of the flat to protect the means of escape.

- It should be considered that radiative analysis alone would not be sufficient to ensure safe means of escape by the resident/s. Design analysis should provide appropriate hazard assessment and tenability criteria, which include smoke levels, toxicity of smoke, heat production and human behaviours.

- As part of the human behaviour analysis consideration should also be given to the occupancy characteristics of the resident/s including mobility impaired people, wheelchair users, people who are deaf or hard of hearing and blind or partially sighted people, as part of the analysis. The psychological and physiological effects of exposure to a fire environment must not adversely affect a person/s travel to a place of safety or that of ultimate safety.

- Design changes in this instance, comprising internal alterations only, are unlikely to affect land use planning and it will be for the applicant to demonstrate compliance at later regulatory stages.

Photovoltaic (PV) panels:

- The proposed Roof Plan drawings confirm that the new proposal includes provision of photovoltaic panels. Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring, and control equipment is provided with appropriate levels of protection against fire.

Hydrants:

- Section 13 of the Fire Statement confirms that the functional status (usable/operable) of the existing public hydrant is unknown. It is noted that the applicant states: "Based on the hydrant plan provided, the above recommendations of BS 9991:2015 have been met. Hydrant flow rate testing should be carried out to verify the efficacy of the existing hydrants on site." However, without confirmation that there is a suitable water supply, the development might be relying on a disused water main or faulty hydrant. Resolving this issue may affect land use planning

considerations such as the landscaping around the development, should additional hydrant installations be required. This will be subject to later regulatory consideration.

9.749 The London Fire Brigade (LFB) have been consulted on the proposal and advised the following:

"The premises referred to is not currently due for an inspection under the risk-based re-inspection programme operated by the Commissioner The premises will be inspected in line with our risk-based re-inspection programme at which time we will review the fire risk assessment as required for premises where a licence is in force under an enactment."

9.750 The Council's Building Control Service have reviewed the Fire Statement and Officers have undertaken a review in accordance with the requirements of London Plan Policy D12 as follows:

London Plan Policy D12(B) requires the following detail:	**Response:**
1. The building's construction: methods, products and materials used, including manufacturers' details.	Details have not been included.
2. The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach	Further information is required in relation to the proposed evacuation lift operation management of all evacuation lifts. The details of protection of common stairs from ancillary uses are not clear. Further information is required in relation to the design for smoke control /clearance systems and external termination locations. For Block B confirmation is required that the area escape windows would be suitable for people with ambulant or mental health impairment. At paragraph 3.3 the travel distances need to be confirmed. For the Clerkenwell building, the residential open plan units have not been fully designed – Open plan design is not suitable for people requiring assistance – see clause 9.7 BS9991:2015.
3. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans	At paragraph 4.6 – the design is not complete. Confirmation required for the following: • Special provision for electrical vehicle charging within the buildings? • What is the 120 minute fire resisting construction proof of performance in regard to electric battery fuel source fires? • Is Block A required to achieve REI90 fire resisting performance? • Other fire resisting performance specifications require clarification.

	• At paragraph 5.5 the external wall construction is not specified – infill panel, cavity wall for example? • At paragraph 5.6 the design is not caried out.
4. Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these	At paragraph 6.2 the fire main outlet, sprinkler tank provision has not provided a firm design At paragraph 6.2.1 the evacuation alert system is not a firm design.
5. How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building	At paragraph 6.1 the access road way route, widths and surface axle support should be detailed.
6. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.	The measures set out in paragraph 7.3 state that the Fire Safety Strategy for the development will outline the proposed design and operation for the buildings. Where there are any proposed changes in the future, reference is to be made to the Fire Safety Strategy to ensure any changes meet the requirements of the Fire Safety Strategy and do not have an adverse effect on the safety of occupants. Where there is an alteration to the design of the building, it is strongly recommended that the Responsible Person commissions the update and development of a new Fire Safety Strategy in order to reflect the proposed changes and fire safety design. The measures in relation to part 6 are considered to be acceptable.

9.751 In addition, Ridge, the Council's appointed Fire Consultant, have prepared a review of the applicant's Fire Statement, which has been shared with the applicant team. The review sets out a number of concerns in relation to compliance with the current British Standards, but also identifies other issues that need further clarification, including:

- It is unclear whether capacity assessments have been carried out or whether it has been deemed necessary to carry out such assessments, in relation to the requirement of providing one evacuation lift per stair core.

- There are examples of two stairs being provided for alternative escape that should not terminate into the same enclosure at the final exit level.

- The review highlights that more information is required on the means of escape from certain specific units.

- Wider issues affecting the fire safety of the development have been identified. First, the existing hydrant provision needs to be tested and confirmed. Secondly, the sprinkler design for the student accommodation needs to be reviewed in detail and depending on the outcome of the review, the size of the sprinkler tank required could have a significant impact on the current designs.

9.752 It is, therefore, considered the Fire Statement currently provides insufficient evidence that the proposal would be in compliance with the requirements of London Plan Policy D12. The proposal also fails to demonstrate safe and dignified emergency evacuation for all building users as required by London Plan Policy D5.

9.753 The details and additional measures required to address the identified non-compliance with Policy D12 and Policy D5 could result in further works that have not been presented before the Council and could involve substantial changes to the proposal as currently proposed.

9.754 Demonstrating policy compliance and achieving the relevant fire safety standards for 178 residential dwellings and 242 student accommodation studios is a fundamental requirement in terms of the acceptability of the proposed scheme. It would not, therefore, be considered appropriate in this instance to secure the necessary fire safety details that are essential to the acceptability of the scheme through a condition.

9.755 The proposal, therefore, fails to provide sufficient detail to demonstrate that the proposed development would achieve the highest standards of fire safety and ensure the safety of all building users in accordance with policy and this weighs against the proposals in the planning balance.

SAFETY AND SECURITY – DESIGNING OUT CRIME

9.756 The Design Out Crime Officer at the Metropolitan Police (DOCO) has provided detailed comments on safety and security. The comments advise that relevant crime statistics for the Junction Ward from the past 12 months (Nov 2023 - Oct 2024) include reported anti-social behaviour (ASB) incidents (1,004); recorded 'violence and sexual offences' (785 – figure does not separate domestic-related assaults); recorded 'other theft' offences (259); recorded 'public order' offences (191); recorded 'criminal damage and arson' (140) and recorded 'burglary' (130) amongst other recorded offences. In respect of these reported statistics and those of neighbouring wards within Islington, it is important that safety and security measures are 'designed in' to help to address these levels and types of crime. The 'Secured by Design' (SBD) scheme with police preferred security measures is specifically designed to help to address issues such as these.

9.757 The DOCO has reviewed the applicant's supporting material and has advised that there is no specific section relating to the proposed security strategy of the site and/or each building, but sporadic mention of some crime prevention methods such as 'natural surveillance', 'active frontages' and 'defensible space'. The DOCO notes that with the above figures for recorded ASB, crime and disorder, it is essential that sufficient crime prevention measures are incorporated and would form a part of the SBD process. As such they have requested that a condition is attached in the event of an approval to require the development to achieve Secured by Design (SBD) accreditation, prior to occupation.

PLANNING OBLIGATIONS COMMUNITY INFRASTRUCTURE LEVY

9.758 Notwithstanding officer's view that the proposal is unacceptable, if the scheme were to be approved impacts (other than those highlighted as concerns by officers in the reasons for refusal) would need to be mitigated through planning obligations, secured via the provisions of a Deed of Planning Obligation under Section 106 of the Town and Country Planning Act 1990 which would secure the required heads of terms between the Council and all persons with an interest in the land (including mortgagees).

9.759 Planning obligations are always drawn up and negotiated based on the characteristics of the individual site and development proposed. Obligations can include either direct provision of a service or facility, contributions towards a provision made by the Council, or both. Obligations reflect the priorities and objectives set out in the London Plan and in Islington's Core Strategy, Development Plan Documents and Supplementary Planning Documents although other matters may be considered if they are relevant to the proposal.

9.760 Part 11 of the Community Infrastructure Levy (CIL) Regulations 2010 introduced the requirement that planning obligations under Section 106 must meet 3 statutory tests, i.e. that they are (i) necessary to make the development acceptable in planning terms, (ii) directly related to the development, and (iii) fairly and reasonably related in scale and kind to the development. Under the

terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), the Mayor of London's and Islington's Community Infrastructure Levy (CIL) would be chargeable on the proposed development on grant of planning permission. This is calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2019 and the Islington adopted Community Infrastructure Levy Charging Schedule 2014.

9.761 Islington's CIL Regulation 123 infrastructure list specifically excludes measures that are required in order to mitigate the direct impacts of a particular development and if specific off-site measures are required to make the development acceptable these should be secured through a S106 agreement.

9.762 Local Plan Policy ST1 (Infrastructure Planning and Smarter City Approach) Part A states that:

The Council will identify and deliver the infrastructure required to support development growth over the plan period and enable effective delivery of the Local Plan objectives, through:

(i) utilising an Infrastructure Delivery Plan and working with relevant providers to ensure necessary infrastructure is provided; and

(ii) requiring contributions from development to ensure that the infrastructure needs associated with development will be provided for, and to mitigate the impact of development.

A Section 106 agreement including relevant Heads of Terms would be necessary in order to mitigate the impacts of the proposed development were the application to be approved. The necessary Heads of Terms are:

- The repair and re-instatement of the footways and highways adjoining the development. The cost is to be confirmed by LBI Highways, paid for by the applicant and the work carried out by LBI Highways. Conditions surveys may be required.

- Compliance with the Code of Employment and Training.

- Facilitation, during the construction phase of the development, of the following number of work placements: 21

    - Each placement must last a minimum of 26 weeks. The London Borough of Islington's approved provider/s to recruit for and monitor placements, with the developer/contractor to pay wages. Within the construction sector there is excellent best practise of providing an incremental wage increase as the operative gains experience and improves productivity. The contractor is expected to pay the going rate for an operative, and industry research indicates that this is invariably above or well above the national minimum wage and even the London Living Wage (£13.85 as at February 2025).
    - If these placements are not provided, LBI will request a fee of: £105,000

- Compliance with the Code of Local Procurement.

- Compliance with the Code of Construction Practice, including a monitoring fee of £59,800 and submission of site-specific response document to the Code of Construction Practice for approval of LBI Public Protection.

- The provision of an additional 42 accessible parking bays or a contribution towards bays or other accessible transport initiatives of: £84,000

- Developments providing wheelchair accessible private or shared ownership units will be required to market them as such for a minimum period of 6 months. Developers should include prominent information on the design standards met by all units and the specific qualities and capacity of the wheelchair accessible units in their marketing brochures and show rooms, on their websites and any billboards used to advertise the development.

- A contribution (TBC) towards offsetting any projected residual CO2 emissions of the development, to be charged at the established price per tonne of CO2 for Islington (currently £920 per tonne).

- Connection to a local energy network, if technically and economically viable (burden of proof will be with the developer to show inability to connect). In the event that a local energy network is not available or connection to it is not economically viable, the developer should develop an on-site solution and/or connect to a neighbouring site (a Shared Heating Network) and future proof any on-site solution so that in all cases (whether or not an on-site solution has been provided), the development can be connected to a local energy network if a viable opportunity arises in the future.

- The submission of a Green Performance Plan

- Submission of a draft framework Travel Plan with the planning application, of a draft full Travel Plan for Council approval prior to occupation, and of a full Travel Plan for Council approval 6 months from first occupation of the development or phase (provision of travel plan required subject to thresholds shown in Table 7.1 of the Planning Obligations SPD).

- Council's legal fees in preparing the Section 106 agreement and officer's fees for the preparation, monitoring and implementation of the S106.

- Submission of an updated viability appraisal if the development has not been substantially implemented within 12 months of the grant of planning consent. Updated appraisal to be submitted prior to substantial implementation with surplus profit used to provide additional onsite affordable housing in accordance with the Development Plan and as set out in an additional affordable housing schedule forming part of the S106 agreement.

- Removal of eligibility for residents' parking permits (additional units only).

- On-site provision of affordable housing.

- Prevention of wasted housing supply for developments of 20 or more residential units. All dwellings required to be fully furnished and equipped for use as a home, and not to be left unoccupied for any continuous period of 3 consecutive months or more (plus other requirements as per Islington's Wasted Housing Supply SPD). The applicant agrees to include these obligations in sales and marketing information and in any head lease or subleases that may be granted.

- Student Accommodation management agreement, including drop-off restrictions, noise agreements, to be made available to local residents on request.

- Student Accommodation nominations agreement

- Temporary use of student accommodation for ancillary uses (where relevant)

9.763 Until a legal agreement to secure obligations is finalised then impacts and harm arising from the development would not be mitigated and an objection would remain. In the absence of any legal agreement to secure necessary planning obligations this forms a reason for refusal.

10 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

10.1 Paragraph 002 of the Environmental Impact Assessment Guidance states that: "The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process. The regulations set out a procedure for identifying those projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects."

10.2 The proposal is of a type and scale that falls within Schedule 2(10) 'Infrastructure Projects' - specifically 10(b) 'Urban Development Projects' of Schedule 2 of the EIA Regulations. The applicant has submitted an Environmental Statement (ES) dated August 2024 with the planning application which communicates the findings of the EIA. The EIA has been tightly scoped by the applicant with

only three topics scoped in: above ground cultural heritage, townscape and visual, and wind microclimate. A formal EIA Scoping process was not undertaken with the Council.

10.3 Paragraph 046 of the Environmental Impact Assessment Guidance states that: "there are specific arrangements for considering and determining planning applications that have been subject to an Environmental Impact Assessment. These arrangements include consideration of the adequacy of the information provided, consultation, reaching a reasoned conclusion on the significant environmental effects of the proposed development, publicity, and informing the consultation bodies and public of both the decision and the main reasons for it. The local planning authority must take into account the information in the Environmental Statement, the responses to consultation and any other relevant information when determining a planning application."

EIA Review

10.4 Waterman Infrastructure & Environment Ltd (Waterman) was commissioned by the Council to undertake an independent review of the ES.

Non-technical ES Chapters and Non-Technical Summary

10.5 The Non-technical ES Chapters and Non-Technical Summary are considered overall to be satisfactory, however it has been identified that further justification is required on scoping out certain topics, including:

- Daylight and Sunlight: Further justification is required on scoping out daylight and sunlight effects on the surrounding residential properties.

- Social Infrastructure: Given the uplift in proposed floorspace and introduction of residential use (noting the changes in floorspace land uses is not clear), further explanation on how the demand for social infrastructure is not considered to be significant should be provided in order to scope out the topic of socio-economics from the EIA.

- Archaeology: Further justification is required on scoping out archaeology. The Site is immediately adjacent to the Tier 2 Archaeological Priority Area and whilst it is possible that any archaeological remains that might have been present have been destroyed by the subsequent development of the Site, it is possible that GLAAS might require further assessment, evaluation and/or mitigation.

- Major Accidents and Disasters: Further explanation on why it is considered the site and nature of the Proposed Development is unlikely to result in significant effects from major accidents and disasters given should be provided, although it is agreed there is unlikely to be any significant effects in this regard.

10.6 The following topics have also not been included in the EIA and no justification has been provided for not including them:

- Climate Change and Greenhouse Gases
- Overshadowing, Solar Glare and Light Spill

10.7 It has also been identified that further information is required on the description of the Proposed Development and the construction activities necessary to facilitate the works.

Cultural Heritage

10.8 The review sets out that the Cultural Heritage ES chapter and appendices generally provide a thorough assessment of the potential impacts of the Proposed Development upon designated heritage receptors within a 1km study area surrounding the Proposed Development (and a 250m study area for Locally Listed Buildings). It identifies that there would be significant harm (Major Adverse) to the Holborn Union Conservation Area including the demolition of historic buildings within it, one of which is Locally Listed. It counters this with numerous heritage benefits which should be weighed against the harms in the planning balance and argues that there would be a net benefit to the character and appearance of the conservation area as a whole.

10.9 The EIA review identifies that there are numerous relatively minor discrepancies within the course of the assessment. In addition, archaeology has been scoped out of the assessment, and it was

recommended that GLAAS are consulted to ascertain whether this is acceptable or whether further assessment, evaluation or mitigation is required. Further details regarding potential impacts to historic fabric through the provision of a Historic Buildings Appraisal may also be required to inform the detailed design and the CEMP. In response, GLAAS have been consulted and a summary of their consultation response is set out earlier in this report.

10.10 The review highlights that no assessment has been provided of the construction impacts to the Locally Listed Buildings that are to be retained and re-furbished. There is a lack of detail regarding the survival and significance of historic fabric within the Locally Listed Buildings.

Townscape and Visual Impact

10.11 The proposed methodology is considered to be in line with the industry practice and follows the necessary guidance. The review highlights that the EA provides limited information provided on the NPPF and local planning policies that are relevant to the townscape and visual assessment. It goes on to set out that further review of some of the effects is required, particularly the construction effects, and justification as to why moderate effects are not considered significant.

10.12 The review notes that some of the assessment findings are questionable, with several effects which have been identified as moderate are not deemed significant. An example of which, the construction effects on the Townscape is considered minor to moderate adverse but is not considered significant.

10.13 In terms of the townscape construction effects, the EIA review highlights that all townscape character areas are assessed as one, whereas they should be assessed separately as each townscape area will have a different effect. The review notes that the effect on the different character areas is therefore not clear. Similarly, the same process has been used for the visual construction effects with only minor adverse effects identified. Given the scale and height of the scheme, the EIA review notes that this is questionable and f*urther information on the justification for this has been requested.*

Wind Microclimate

10.14 The overall approach of wind tunnel testing a physical scale model in conjunction with long-term wind climate statistics corrected to apply at the Site and the Lawson criteria for pedestrian comfort and safety should provide a robust assessment of the likely wind conditions. However, the review identifies that there are several potential issues regarding the assessment, as listed below:

- In line with EIA best practice, the embedded mitigation (included in the detailed design submitted for approval) should be included in the basic assessment. However, the results presented in the ES remain informative and this issue does not impact on the assessment of residual effects. No clarifications on this matter are therefore required.

- Different sources for the wind climate statistics are stated in the ES chapter and in parts of Appendix 8.2. Heathrow data on its own (as listed in the ES chapter) creates a more south-south-westerly bias to the prevailing sector, than combined data from weather stations around the London area. Given the orientation of the tower, this is potentially conservative. For combined data from Heathrow, Gatwick and Stansted airports (as listed in the detailed methodology in Appendix 8.2), use of Gatwick and Stansted airports is (in the reviewer's experience) less common and some consultancies that previously used this data switched sources some time ago. Previous analysis of data from these locations suggested that reported wind speeds were lower than from other weather stations in the southeast of England. Therefore, whilst their use could be argued, reported conditions have potential to be slightly calmer than would be derived using either Heathrow alone or a combination of Heathrow and London City airport statistics. The source of the climate data should therefore be clarified.

- The factors applied to correct the wind climate statistics to the site appear appropriate relative to open country terrain but slightly low relative to Heathrow Airport weather centre (as stated). It is therefore recommended that the factors are confirmed by the Applicant.

- Further details of the atmospheric boundary layer simulation should also be provided by the Applicant. This should include target and simulated longitudinal turbulence and gust profiles.

- The target criteria applied are not typical and should either be amended or further justification provided to support their application. In particular:

- Business Walking conditions relate to walking with purpose (usually in relation to work activities), without lingering, and is not typically targeted for a mixed-use development. There are some cases where it could be argued as being tolerable. However, this would not, in the reviewer's opinion, apply to areas such as Clerkenwell Walk on the periphery of a public square and where the landscaping plans suggest potential for spill-out seating.

- A mix of sitting and standing conditions is commonly applied for larger, communal and public, amenity spaces, but this does require that seating areas such as café outdoor seating, picnic areas, etc. are located in areas with suitable condition for sitting. The applied target criteria is not therefore considered appropriate for areas with existing outdoor seating or where outdoor seating is specifically proposed. For example, the landscaping plans appear to show spill-out seating from Block C's café and the Archway Tavern appears to have an outdoor seating area in Navigator Square. In addition, although summer represents the critical season for amenity spaces, extending suitable conditions for recreational activities into spring and autumn is considered beneficial

- The significance criteria applied is not uncommon but is considered flawed. In particular, achieving calmer on-site conditions than required for a proposed use should not be considered a beneficial effect of the Proposed Development (particularly sitting conditions in the middle of a car park or roadway which the criteria would suggest is major beneficial). It is recommended that all stated beneficial on-site effects be considered of negligible significance

- Several updates to the Proposed Development introduced subsequent to the wind tunnel testing are highlighted in Appendix 8.2 but are not discussed in the ES chapter and are not listed in the limitations section. A detailed list of relevant updates, and their potential effects, including the building massing, entrance locations and recessing, landscaping, and possibly further details on proposed uses, should be provided by the Applicant

- The target criteria are not considered appropriate and it is recommended that either the assessment be amended or further justification provided to support the target criteria applied

- Poor resolution and lack of detail in the results presentation makes it impossible to check measurement locations against submitted drawings. However, it does appear that several probes referred to as entrances may not be located at the final entrance locations, whilst the landscaping plans suggest more widespread outdoor seating than assessed. It is recommended that the Applicant provides a detailed plan of the sensor locations and assumed uses, against the submitted plans (particularly to show the relation between the probes and building entrances, including recesses, and proposed outdoor seating).

- There are several typos and inconsistencies in probe numbers, between the ES chapter and Appendix 8.2. In particular, paragraph 8.74 appears to have errors in the probe number, target conditions and achieved conditions. It is recommended that these be reviewed and corrected.

- As discussed above, the potential for impacts on several sensitive surrounding receptors have not been considered, including a further bus stop on Highgate Hill to the west of the Site and private gardens bordering the northwest of the Site. The illustrative masterplan presented in Appendix 4.1 also suggests potential for a play space at Level 01 of Block A, which has not been assessed. It is recommended that the Applicant clarify the likely suitability of proposed site conditions for the sensitive uses of these spaces.

- As discussed above, it is recommended that the claimed beneficial effects on surrounding conditions are assumed to be of negligible significance.

10.15 The review sets out that further details of the wind mitigation are required:

- Images of the wind tunnel model in Appendix 8.2 suggest that the modelled trees had very dense canopies, far denser than applied by many specialist wind consultancies to represent deciduous trees in winter. The stated heights, at up to 8– 10 m, also appear relatively large

for initial, upon-planting (as typically applied), heights. The Applicant should therefore confirm the sizes and types of trees required for wind mitigation purposes.

- The porous screen introduced in the southeast corner of the Site appears small to fully mitigate accelerated winds occurring across the relatively open space around probe 94. Whilst the density of probes around the base of the tower is high, there is some concern regarding the extent of non-instrumented area in this part of Tollhouse Way (between probes 94, 164, 148, 48 and 144). It is also unclear from the model photos if the screen was modelled in the position shown in the plans. It is therefore recommended that the Applicant confirm what sensitivity checks were carried out to verify the effectiveness of the screen.

10.16 The review recommends that a high-resolution and detailed plan of the landscaping and wind mitigation, including details of the smaller trees, be provided by the Applicant.

10.17 As discussed above, the target criteria (upon which the assessed negligible residual effects are assessed) are not considered appropriate and it is recommended that either the assessment be amended or further justification be provided to support the target criteria applied. This should also consider any updates or additional information regarding entrance locations and recesses, and proposals for outdoor seating.

EIA Review - Conclusions

10.18 The EIA review sets out that further justification is required for scoping out the topics of archaeology, socio-economics, overshadowing, solar glare and light spill. With regard to Cultural Heritage, the EIA review identifies that there are numerous relatively minor discrepancies within the course of the assessment and highlights that GLAAS should be consulted to ascertain whether further assessment, evaluation or mitigation is required. The review highlights that the EA provides limited information on the NPPF and local planning policies that are relevant to the townscape and visual assessment and that a review of the construction effects and whether effects are significant has been recommended.

10.19 In relation to wind and microclimate the EIA review highlights concerns that the assessment inputs may be optimistic and non-conservative and result in more favourable outcomes for the development. It also questions the reliability of the proposed wind mitigation measures. The target criteria (i.e. walking, sitting etc.) upon which the assessed negligible residual effects are assessed are not considered appropriate and it is recommended that either the assessment be amended or further justification be provided to support the target criteria applied.

10.20 Furthermore, with regard to the proposed wind mitigation measures the wind tunnel model in Appendix 8.2 suggests that the modelled trees had very dense canopies, far denser than applied by many specialist wind consultancies to represent deciduous wind tunnel trees in winter. The review concludes that the stated tree heights, at up to 8–10m, also appears relatively large for initial, upon-planting (as typically applied), heights. The review also notes that the proposed porous screen introduced in the southeast corner of the site appears small to fully mitigate accelerated winds occurring across the relatively open space around this location.

10.21 Details of the review of the ES have been provided to the applicant, but at the time of writing no further information relating to the ES has been provided by the applicant's team within the agree determination period. Therefore, at this stage the ES fails to provide adequate information to allow officers to reach a reasoned conclusion on the significant environmental effects of the proposed development, particularly with regards to wind microclimate testing that has been undertaken.

10.22 The submitted Environmental Statement does not include information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment and would therefore be contrary to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The failure to demonstrate compliance with the requirements of the EIA regulations weighs negatively against the proposal in the overall planning balance.

11 PLANNING BALANCE

11.1 As identified within this report, the proposed development would result in identified harm and some identified benefits in planning terms.

11.2 Section 70(2) of the Town and Country Planning Act 1990 states that in dealing with a planning application 'the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material consideration.'

11.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

11.4 There are the following additional requirements when considering planning applications which affect the setting of a listed building or the character and appearance of a conservation area. (Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

11.5 Section 72(1) of the Act states: 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

11.6 The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.

11.7 The NPPF states at paragraphs 212 and 215, inter alia, that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use

11.8 Paragraph 216 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

11.9 Regard must therefore be had to what other material considerations may apply to the site and the proposal and what weight should be given to them, and a decision must be made as to whether these material considerations outweigh the clear harm and breaches of policies that the proposal would cause.

Assessment of Harm

11.10 The extensive harm that would result from the proposed development has been addressed in detail within this report. For the avoidance of doubt, the harmful aspects of the proposal are summarised below:

11.11 The report identifies harm in respect of the under provision and lack of justification for the affordable housing provision and inappropriate tenure mix. The proposal fails to provide 50% on-site affordable housing without public subsidy and in turn fails to demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised, and demonstrate additionality delivered using any and all forms of public subsidy. The proposal is therefore considered to be contrary to Local Plan Policy H3 Part D (i) & (ii) the Site Allocation ARCH5

11.12 In addition, the proposal fails to provide a policy compliant affordable housing tenure split for the social rented housing and intermediate housing. The proposal is therefore considered to be contrary to Local Plan Policy H3 Part J and the Site Allocation ARCH5. This weighs significantly against the proposals in the planning balance.

11.13 The proposal is therefore considered to be incompatible with the fundamental land use requirements for new development at the site and this weighs significantly against the proposal in the planning balance.

11.14 The report finds harm in respect of the over provision of student accommodation. The proposal fails to demonstrate that student housing would be acceptable as part of the development mix as the proposed quantum of student accommodation is considered to weigh against the provision of priority conventional housing on the site and would not ensure that the development can achieve the quantum and tenure of affordable housing which is fully policy compliant. In this regard, the proposal is considered to be contrary to the Site Allocation ARCH5 and Local Plan Policy H3 Part D (i) & (ii) and Part J. This weighs significantly against the proposals in the planning balance.

11.15 The report identifies harm in respect of the failure to provide affordable student housing. In failing to provide affordable student accommodation as part of the student housing offer the proposal is contrary to London Plan Policy H15 Part A (4.a) and Local Plan Policy H6 Part B (vi). This weighs against the proposal in the planning balance.

11.16 The report identifies harm in relation to the proposed unit mix and the high proportion of one-bedroom units in the affordable housing component of the development specifically. This over-concentration of one-bedroom units would be contrary to Local Plan Policy H2 Part E and this weighs moderately against the scheme in the planning balance.

11.17 The report identifies harm to designated and non-designated heritage assets. This comprises less than substantial harm by reason of the demolition and alteration of non-designated heritage assets, the loss of openness of the west side of the site, the scale, height and footprint and location of the new buildings which would dominate the conservation area, its buildings and the settings of heritage assets and the impact of the tall building on designated views, the proposed development would cause harm to the significance of the designated heritage assets. In the terms of the NPPF, this would be less than substantial harm, but at the higher levels of less than substantial harm. Officers do not consider that the heritage benefits would be sufficient to outweigh this harm and a detailed assessment is set out in the Heritage section of the report.

11.18 With regard to heritage impacts, it is considered that the proposal would fail to preserve or enhance the character and appearance of the Holborn Union Infirmary Conservation Area and would cause harm to the significance of designated heritage assets contrary to paragraph 215 of Chapter 16 (conserving and enhancing the historic environment) of the National Planning Policy Framework 2024, policy DH1: Fostering innovation and conserving and enhancing the historic environment; policy DH2: Heritage Assets; and policy DH3: Building Heights of Islington Local Plan 2023 and guidance contained within Islington's Holborn Union Infirmary Conservation Area Statement and Design Guidelines 2014. This weighs significantly against the proposal in the planning balance.

11.19 The report identifies harm in respect of the proposed tall building, which represents a departure from the development plan. The site is not allocated for a tall building, and the proposal is therefore contrary to Policy DH3 Part B.

11.20 The assessment of the visual, functional and environmental impacts of the tall building under Part E of the Policy DH3 finds that the proposal fails to demonstrate compliance with the following criteria:

- The proposal fails to protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place contrary to criteria (i).
- The proposal fails to protect or enhance strategic and local views, namely the LVMF: Panorama 1A. View from Alexandra Palace terrace and Local View LV5 from Archway Bridge to St Paul's Cathedral, contrary to criteria (ii).

11.21 The proposal fails to conserve and enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance, including the Holborn Union buildings, Waterlow Park, Highgate West Cemetery, St Joseph's Church and St John's Conservation Area, contrary to criteria (iii).

11.22 It is not considered that the scale and height of the proposed tower would be proportionate and compatible to its surroundings and the character of the area contrary to criteria (iv).

- The proposed tower, by virtue of its current height and thus visual impact would fail to protect or enhance the settings of local landmarks contrary to criteria (vii).
- The proposals do not meet a range of sustainable design and green infrastructure policies and therefore fail to promote exceptional sustainable design standards contrary to criteria (xi).

11.23 The proposals fail to satisfactorily demonstrate that the development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site, contrary to the requirements of criteria (xii)

- The applicant has not demonstrated at this stage that the proposal would not result in adverse individual or cumulative impacts on biodiversity, contrary to criteria (xiii).

11.24 Policy DH3 Part D states that proposals for tall buildings must satisfy all of the criteria listed in Part E of the policy. As set out above the proposal would be contrary to Policy DH3 Part E (i), (ii), (iii), (iv), (vii), (xi), (xii), (xiii). For these reasons the proposal is also contrary to London Plan Policy D9. The proposal therefore represents a significant departure from the Development Plan that is not justified and introduces harm. This weighs significantly against the proposals in the planning balance.

11.25 The report identifies harm in respect of the failure to demonstrate an acceptable standard of living accommodation for all future residents within the proposed residential accommodation. The provision of single aspect homes, studio units and poor levels of daylight and sunlight would result in homes that have an unacceptably poor quality of amenity for their future occupiers. The proposal would therefore be contrary to London Plan Policy D6 Part C and Local Plan Policy H2 Part F and Part I. In addition, the proposal would make no provision of private outdoor space for the homes located in the converted heritage buildings. The proposal would therefore be contrary to Local Plan Policy H5 Part A.

11.26 The report identifies harm in the lack of sufficient detail to demonstrate that appropriate fire safety standards would be met. This weighs significantly against the proposal in the planning balance.

11.27 It has not been demonstrated that the proposal would sufficiently address accessibility and inclusive design requirements, such that it would be harmful, and this lack of access weighs against the scheme in the planning balance.

11.28 The proposal would result in harm to trees of high amenity value, which weighs against the scheme in the planning balance.

11.29 The report finds that the proposal would not met policy requirements for sustainability and energy matters, nor meet BNG requirements such that these would be harmful. This weighs significantly against the scheme in the planning balance.

Assessment of Benefits

11.30 The applicant's submitted Planning Statement (in Table 10) identifies what the applicant considers to be the benefits of the proposals. These are set out and considered below:

- *The efficient use of previously developed land in an area of high accessibility by sustainable transport.*

11.31 Although some weight could be afforded to the efficient use of previously developed land, particularly given the site's PTAL rating and proximity to public transport infrastructure, for the reasons detailed within this report, it is considered that the proposals would **not** represent an efficient use of the land. The inefficient and unacceptable use of the land would therefore weigh against the proposal.

- *Delivery of substantial quantum of affordable housing*

11.32 The delivery of 91 affordable housing units does represent a benefit that carries some weight in the consideration of the proposals. However, the affordable housing policies set out in both the London Plan and Islington Local Plan are clear that proposals should seek to maximise the delivery of on-site affordable housing. For this site, formerly in public ownership, the policy position is clear that the site should deliver 50% affordable housing without public subsidy and seek to deliver additionality beyond this through public subsidy.

11.33 As detailed in this report, following an independent review of the applicant's Financial Viability Appraisal (FVA), and work undertaken by the Council's viability consultant, it is clear that the FVA does not demonstrate that the applicant's offer would be deliverable. However, rather than being in deficit, the Council's review suggests that the proposal could deliver a financial surplus. Furthermore, the tenure mix does not meet the policy requirement to prioritise social rented housing, which is

supported by the GLA Accelerated Housing Delivery' (2024) practice note, and the applicants FVA is reliant upon public subsidy to achieve 50% affordable housing, contrary to policy.

11.34 When considered together with the proposed quantum of student accommodation, which equates to approximately one third of the floor area, and the inclusion of an unacceptable tall building, it cannot be said that the proposals maximise the amount of conventional residential housing, and specifically affordable housing on site.

11.35 It is therefore considered that the proposal fails to maximise the proportion of affordable housing that could be delivered, and this weighs significantly against the proposal in the balance, rather than in favour of the development.

- *Delivery of substantial quantum of market housing at a time of substantial pressure on housing delivery*

11.36 Some weight can be afforded to the delivery of 87 market housing units. However, this is considered to be of limited weight for the reasons detailed in this report; namely that it has not been demonstrated that the proposal makes efficient use of the land nor that the excessive provision of student accommodation does not weigh against the provision of priority conventional housing at the site and that there is likely to be capacity within the FVA for greater delivery of affordable housing.

- *The removal of the conservation area from the Historic England Heritage at Risk Register through a long-term viable use*

11.37 It is acknowledged that the Holborn Union Infirmary Conservation Area is on Historic England's Heritage at Risk Register and it is agreed that a suitable long-term viable use of the site would prevent further decline, while also restoring aspects of the site. If this were to be achieved, it would be considered to represent a benefit.

11.38 However, as set out in detail in the Heritage section of this report the proposals, including but not limited to, the extent of demolition and scale, height and massing of proposed new buildings would amount to less than substantial harm to the heritage assets, including the conservation area. This would be at the higher levels of less than substantial harm and the proposals would be contrary to policy, to statute and guidance. As such, while the principle of the benefit could carry significant weight, in practice the heritage assessment is clear that the proposal would fail to accord with policy, would result in harm to the heritage asset and would therefore fail to deliver the desired benefit. As such, contrary to the applicant's position, it is considered that this failure carries significant weight against the proposal in the planning balance.

- *Celebrating the locally designated heritage assets within a conservation area*

11.39 It is agreed that in principle achieving this benefit would help to secure social, economic and environmental objectives. However, as set out in detail in the Heritage section of this report, and in the immediately preceding paragraphs, the proposal would **not** achieve this desired benefit. In contrast the Heritage assessment in this report provides a detailed analysis as to the harm resulting from the proposal and how this would fail to celebrate the locally designated heritage assets within a conservation area. This therefore weighs against the scheme.

- *Exemplar architecture quality*

11.40 The architectural quality of the proposed new buildings and additions, including the affordable housing blocks and the 'bookend' extensions to the historic Main Range would achieve a high standard of architecture. While it is acknowledged that the delivery of a high-quality design is a positive benefit, this is a requirement of Local Plan Policy PLAN1 and more specifically in relation to tall buildings, policy DH3 Part E(v) requires exceptional design, while London Plan Policy D9 Part C(c) requires architectural quality and materials to be of exemplary standard. Given the delivery of such architectural quality is a policy requirement, it is considered that this can only be afforded limited weight in the planning balance.

- *Delivery of high-quality public realm and landscape, including connectivity to Archway Town Centre*

11.41 The proposals would introduce a high-quality public realm, providing an improved connectivity to Archway Town Centre. However, as detailed in this report, there are issues pertaining to a lack of

step free access, the location of the play space and path gradients meaning that the public realm would not achieve appropriate Inclusive Design standards. While it is acknowledged that a high - quality public realm and improved connectivity are a benefit, the lack of provision of an inclusive public realm weighs against the scheme

- *A sustainable approach to the development retaining as much embodied carbon as possible*

11.42 As detailed within the 'Sustainable Design and Construction' section of this report, the proposal fails to achieve the minimum policy compliance with regard to retaining embodied carbon. Given the importance of ensuring that new development meets the challenges of climate change, it is considered that the scheme does not provide an appropriate approach to sustainable development, and specifically embodied carbon, such that this can only weigh against the proposal in the planning balance.

- *Sustainable development providing a net gain in biodiversity and urban greening*

11.43 A number of biodiversity/greening improvements are proposed including the provision of green roofs, green walls, semi-natural vegetation, small trees, flower-rich planting, and an area of rain garden and hedges. An Urban Greening Factor (UFG) score of 0.5 has been achieved which exceeds the 0.4 target as required by policy for residential-led development. This is considered to be a benefit of the scheme.

11.44 However, as set out in the 'Biodiversity' section of this report the proposal fails to achieve the minimum requirements in terms of Biodiversity Net Gain (BNG), with a score of 8.54, falling short of the 10% BNG requirement. This therefore weighs against the proposals.

- *Provision of PBSA meeting a London wide identified need and reducing pressure upon housing supply*

11.45 The proposed development would contribute to PBSA bed space requirements at the London wide level. However, this 'benefit' does not translate to the local level, and as set out in this report. The delivery of conventional housing, in particular affordable housing, is the key priority for the borough. The proposal fails to demonstrate alignment with the Site Allocation and key policy requirements in terms of land use. There are significant concerns surrounding the proposed quantum of student accommodation and it has not been demonstrated that the proposed amount of student housing is necessary to support the delivery of priority conventional housing and a policy compliant level of affordable housing.

11.46 It is considered that there are elements of the scheme that could otherwise be used for conventional and affordable accommodation to assist with policy compliance and the overall planning balance. While the provision of additional PBSA would bring some London wide benefit, this would be limited in comparison to subsequent harm resulting from a failure to maximise the delivery of conventional housing and affordable housing. Furthermore, in not providing any affordable student accommodation, this lessens any benefit that can be prescribed to the PBSA. As such, it is considered that there is no benefit in the provision of PBSA.

- *GVA to the local economy of almost £4m per annum, and a 20 year cumulative, discounted public sector income (NPV) of almost £17.5m*
- *Construction spend and local employment/ training*
- *Additional income to the local authority as a result of resident and student community*
- *Defined Social Value of £15m*

11.47 The remaining public benefits detailed by the applicant, as set out above, which relate to the economic value of the proposed development are considered together. The economic benefits arising from the proposal by virtue of the creation of new homes, footfall for the local economy and additional jobs in an accessible and sustainable location is acknowledged. However, relevant planning policy also requires that any economic benefits should not be at the expense of other planning considerations. As such, only limited weight can be attributed to these economic benefits.

Planning Balance Conclusion

11.48 Overall, it is considered that the limited benefits that the proposal would deliver are wholly insufficient to outweigh the significant harm identified in this report and the substantial conflict with the Development Plan. As such, the application is recommended to be refused for the reasons detailed at Appendix 1.

12 REASON FOR RECOMMENDATION

12.1 For the reasons noted within this report, it is considered that unacceptable harm would result from the proposals, with substantial conflict with the development plan, and insufficient benefits would be delivered/secured, such that the harm would be outweighed. Subsequently, the proposals are considered not to be acceptable for the reasons detailed in this report.

12.2 With regard to the Environmental Impact Assessment considerations, for the reasons set out above, namely that the submitted Environmental Statement and the reports comprising the planning application do not provide adequate information to allow officers to reach a reasoned conclusion on the significant environmental effects of the proposed development, it is considered that the proposal is contrary to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

13 CONCLUSION AND RECOMMENDATION

13.1 It is recommended that planning permission is refused for the reasons set out in Appendix 1. The resolution to refuse planning permission will now be referred to the Mayor of London at Stage 2.

APPENDIX 1 – RECOMMENDATION

That planning permission be **REFUSED** for the reasons listed below:

1. **REASON FOR REFUSAL**: The proposal fails to provide 50% on-site affordable housing without public subsidy and fails to demonstrate how all potential public subsidy options for maximising the delivery of on-site affordable housing in excess of 50% have been utilised, and demonstrate additionality delivered using any and all forms of public subsidy. In addition, the proposal fails to provide a policy compliant affordable housing tenure split for the social rented housing and intermediate housing. The proposal is, therefore, contrary to London Plan (2021) policy H4 and H6, Islington Local Plan (2023) policy H3 and Islington Site Allocations (2023) - Site Allocation ARCH5.

2. **REASON FOR REFUSAL**: The proposal fails to demonstrate that the proposed quantum of student accommodation would not weigh against both the provision of priority conventional housing on the site nor that it would ensure the development could achieve a quantum and tenure of affordable housing which is fully policy compliant. Furthermore, it has not been demonstrated through a binding nomination agreement that the accommodation would only be occupied by students or one or more higher education provider. As such, the introduction of student accommodation is considered to be unacceptable and would be contrary to London Plan (2021) policy H15, Islington Local Plan (2023) policy H3 and H5, and Islington Site Allocations (2023) - Site Allocation ARCH5.

3. **REASON FOR REFUSAL**: The proposed development, by reason of the demolition of and alteration to non-designated heritage assets; the scale, height, footprint and location of the new buildings; the extent of the loss of boundary definition at the south of the site; and the impact of the tall building; would fail to preserve or enhance the character and appearance of the Holborn Union Infirmary Conservation Area and would cause harm to the significance of designated heritage assets contrary to Chapter 16 of the National Planning Policy Framework (2024), London Plan (2021) policies D3, D8 and D9, Islington Local Plan (2023) policy DH1, DH2 and DH3, and the guidance contained within Islington's Holborn Union Infirmary Conservation Area Statement and Design Guidelines 2014.

4. **REASON FOR REFUSAL**: The proposal would introduce a tall building to a site not allocated for a tall building and by reason of its excessive height, scale and location it would result in unacceptable visual, functional and environmental impacts. The proposal is, therefore, contrary to London Plan (2021) policy D3 and D9, Islington Local Plan (2023) policy PLAN1, DH1 and DH3 and the guidance contained within Islington's Holborn Union Infirmary Conservation Area Statement and Design Guidelines 2014 and the Urban Design Guidelines 2017.

5. **REASON FOR REFUSAL**: The proposal fails to provide an appropriate mix of unit sizes to ensure that the new housing provision contributes to meeting housing mix priorities by reason of an unacceptable concentration of one-bedroom units – overall and as part of constituent market and affordable elements; and by failing to demonstrate exceptional circumstances for the provision of studio units. The proposal is therefore contrary to London Plan (2021) policy D6 and Islington Local Plan (2023) policy H2.

6. **REASON FOR REFUSAL**: By reason of the over provision of single aspect units, low levels of daylight and sunlight to conventional housing and student accommodation, the unjustified provision of studio flats, the lack of private amenity space provision (particularly for family units), the poor quality and insufficient provision of communal open space, the failure to provide a sufficient quantum, quality and mix of play facilities for children and young people of all age ranges and abilities, failure to provide 10% of housing as M4(3) wheelchair accessible housing and failure to provide an appropriate management and maintenance plan for the student accommodation, the proposal would not provide an acceptable standard of living accommodation for all future residents. The proposal is, therefore, contrary to London Plan (2021) policy D5, D6, D7, S3 and Local Plan Policy (2023) H4, H5, H6 and SC2.

7. **REASON FOR REFUSAL**: The proposal fails to provide sufficient detail to demonstrate the proposal's compliance with sustainable design and green infrastructure requirements. Key

insufficient information includes but is not limited to the proposal's failure to: demonstrate a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27% beyond Part L of the 2013 Building Regulations; provide sufficient detail on how the development will reduce the potential for overheating and reliance on air conditioning systems, in line with the cooling hierarchy; fully investigate and implement all reasonable on-site opportunities to improve air quality in line with the GLA Air Quality Positive Guidance; demonstrate compliance with the GLA Circular Economy Statement Guidance, including failure to take a whole-site circular economy approach; and to demonstrate that the proposal would not have an adverse ecological impact on protected species and local biodiversity. The proposal is therefore contrary to Section 15 of the National Planning Policy Framework (2024), London Plan (2021) policies GG3, SI1, SI2, SI4, SI7 and D3, Islington Local Plan (2023) policies S1, S2, S4, S5, S6, S7, S8, S9, S10, G2, G4, G5 and the GLA Whole Life Carbon Assessments Guidance (2022) and GLA Air Quality Positive Guidance (2023).

8. **REASON FOR REFUSAL**: The proposal fails to provide sufficient detail to demonstrate that the proposed development would achieve the highest standards of fire safety and ensure the safety of all building users. The proposal is therefore contrary to London Plan (2021) Policy D5 and D12.

9. **REASON FOR REFUSAL**: By reason of the failure to provide 10% of housing as M4(3) and the failure to provide sufficient evidence to demonstrate the provision of accessible routes to and within homes, sufficient habitable room and bathroom provisions within the entrance floors of homes, sufficient accessible circulation space and fit out details, accessibility of refuse and recycling stores and a lack of accessible cycle parking and mobility scooter parking facilities, the proposal fails to provide adequate measures to address accessibility and inclusive design requirements. The proposal therefore fails to demonstrate that it would result in inclusive, accessible buildings and open spaces which meets the needs of intended occupiers and visitors. The proposal is therefore contrary to the NPPF (2024), London plan (2021) policies D5, D6 and H15, Islington Local Plan (2023) policy PLAN1, H2, H4 and G4 and the guidance within Islington's Inclusive Design SPD (2014) and Islington Streetbook SPD (2012).

10. **REASON FOR REFUSAL**: The proposed development, by virtue of its inappropriate footprint, scale, siting and massing would result in significant physiological short, medium and long term harm to the vitality and health of trees of significant amenity within the site. Furthermore, insufficient information has been submitted to demonstrate that trees will be protected during construction and ensure their continued vitality. The proposal would therefore be harmful to the trees at the site and, is contrary to London Plan (2021) policy G7 and Islington Local Plan (2023) policies G1 and G4.

11. **REASON FOR REFUSAL:** The proposal fails to demonstrate that the proposed basement areas would not cause an unacceptable degree of harm in line with the criteria set out in Islington Local Plan (2023) Policy DH4. The proposal is therefore contrary to London Plan (2021) policy D10, Islington Local Plan (2023) policy DH4 and the guidance within Islington's Basement Development SPD (2016).

12. **REASON FOR REFSUAL:** Insufficient information has been provided to assess the impact of the proposed development with regard to biodiversity net gain. In the absence of an acceptable Biodiversity Net Gain assessment and relevant Metric Calculations, it has not been demonstrated that the mandatory 10% Biodiversity Net Gain would be provided as part of the development. The proposal would therefore be contrary to Article 7 of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021), the NPPF (2024) Section 15, London Plan (2021) policy G6 and Islington Local Plan (2023) policy G4.

13. **REASON FOR REFUSAL**: In the absence of an appropriate Section 106 legal agreement, the application fails to provide measures to mitigate the impacts of the development through enhancements to services and the environment necessary as a consequence of demands created by the proposed development (including, but not limited to, highway and footway reinstatement works, affordable housing provision, compliance with the Code of Construction Practice including monitoring fee, compliance with Code of Employment & Training and facilitation of work placements; Compliance with Code of Local Procurement; provision of accessible parking bays; carbon offsetting requirements, and Travel Plan requirements) and, as such, the proposal fails to

accord with policies GG4, E11, H4, H6, SI 2, T4 and T6.1 of London Plan (2021), policies B5, H3, S1, T1 and T3 Islington Local Plan (2023), Islington Site Allocations (2023) - Site Allocation ARCH5, Islington's Planning Obligations SPD (2020), the Environmental Design SPD (2012).

14. **REASON FOR REFUSAL:** The submitted Environmental Statement does not include information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment. It is therefore contrary to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

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APPENDIX 2 - Greater London Authority (GLA): Strategic Planning Application Stage 1 Referral Response - 2 December 2024

GREATER**LONDON**AUTHORITY

Planning report GLA/2024/0547/S1/01

2 December 2024

Archway Campus

Local Planning Authority: Islington

Local Planning Authority reference: P2024/2598/FUL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment of the site to provide 178 new homes, 242 purpose-built student accommodation (PBSA) rooms and 88 s.q.m. of café floorspace.

The applicant

The applicant is **Seven Capital (Highgate Hill) Ltd** and the architects are **GRID Architects** and **NMLA**.

Strategic issues summary

Land use principles: The scheme would delivery 178 new C3 homes and 242 student beds which is consistent with the site allocation and would contribute towards meeting housing targets. This is supported in land use terms.
Affordable housing: 30% affordable housing comprising 72% social rent and 28% LLR (no affordable student accommodation) is proposed. The scheme is following the viability tested route and an update will be provided at Stage 2.
Urban design and heritage: The scheme would result in less than substantial harm to the conservation area and several nearby heritage assets. GLA Officers will conclude on the suitability of the tall building and the heritage harm at Stage 2.
Transport: The Applicant and the LPA should engage with TfL to resolve matters relating to impacts on bus infrastructure; trip generation; and extent of TLRN highway works. TfL Infrastructure mitigation should be secured.
Other issues on sustainable development and environmental issues also require resolution prior to the Mayor's decision making stage.

Recommendation

That Islington Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 135. Possible remedies set out in this report could address these deficiencies.

Context

1. On 17 October 2024 the Mayor of London received documents from Islington Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   - 1A "*Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats*"; and

   - 1Cc "*Development which comprises or includes the erection of a building of more than 30 metres high and outside the City of London*".

3. Once Islington Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planning.london.gov.uk/pr/s/

Site description

6. The application site is an irregular shaped plot bound by Highgate Hill to the south east and south west, Archway Road to the east and neighbouring developments to the north. The site has historically been used for education, clinical and health services research purposes but is currently vacant and has been for several years.

7. The application site is within the Holborn Union Infirmary Conservation Area. The site is a designated Brownfield Land Register site. At a local level, the site is allocated in the Islington Local Plan for "residential-led development, with some commercial and community and social infrastructure uses".

8. The site has an excellent Public Transport Access Level (PTAL) of 6b where 0 is the lowest and 6b is the highest. The site is located approximately 200 metres north of Archway London Underground Station, which provides access to the Northern Line. Upper Holloway London Overground Station is also located approximately 500m south east of the site. There are several bus stops located on Archway Road and Highgate Hill, providing access to services 143,

210, W5, 41, 43, 134, 263 and the N20. There is also both a southbound and northbound bus stand located on Archway Road, with the services 17, 143 and 390 operating on Archway Road Northbound, and services 4, C11 and W5. Each stand is 79 metres in length and provides space for up to 6 buses to stand. There is also comprehensive cycle infrastructure surrounding the site, with on/off carriageway cycle routes on the west side of Highgate, Tollhouse Way and Archway Road.

Details of this proposal

9. Redevelopment of the site to provide 178 new homes (47% affordable by habitable room), 242 purpose-built student accommodation (PBSA) rooms and 88 s.q.m. of café floorspace.

10. The works involve demolition of the Furnival, Ely, Staples and Nurses Accommodation buildings; partial demolition, restoration and change of use of the Holborn Union, Charterhouse and Clerkenwell buildings; and construction of new buildings, with delivery of landscaping, public realm enhancements, gardens and play space.

Case history

11. The GLA issued pre-application advice on 29 June 2023 giving broad in principle support for the residential-led mixed-use development, including 50% affordable housing, and PBSA with commercial uses. However, GLA Officers considered issues with respect to affordable housing/viability, student accommodation, design, tall buildings and heritage must be addressed in advance of an application being made.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Islington Local Plan (2023); Islington Local Plan Site Allocations (2023); and the London Plan 2021.

13. The following are also relevant material considerations:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance;
- A Written Ministerial Statement, for the ongoing consultation on the revised NPPF was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft NPPF was also published on 30 July 2024. However, given it is still in draft and subject to consultation and change, the weight to attach to it is limited.
- Bunhill and Clerkenwell Area Action Plan (2023).

14. Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on land use, affordable housing, student accommodation, urban design, heritage, transport, sustainable development and environmental matters, which can be found on the GLA's website here[1].

Land use principles

Residential development

15. London Plan Policy H1 sets Islington an annualised average housing completion target of 7,750 over the ten-year plan period 2029. In accordance with London Plan Policy, which seeks to increase housing supply, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. This includes sites with high public transport access levels (PTALs) or which are located within 800 metres distance of a train station.

16. The site is allocated in the Islington Local Plan for "residential-led development, with some commercial and community and social infrastructure uses". The proposed development would provide 178 new homes (Use Class C3) which aligns with the site allocation and would contribute towards meeting local housing targets. As such, the proposed residential use is supported in land use terms.

Purpose-built student accommodation

17. London Plan Policy H15 seeks to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed and sets out requirements for PBSA developments. Paragraph 4.15.2 of the London Plan specifies that the Mayor's Academic Forum has established that there is an annual requirement for 3,500 PBSA bed spaces over the plan period.

18. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London and that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. Further it is noted that the provision of high-density student accommodation can help free up existing housing stock in the private rented sector, noting that London Plan Policy SD1 seeks housing choice for Londoners.

19. Paragraph 4.1.9 of the London Plan states that net non-self-contained accommodation for students should count toward meeting housing targets on the basis of a 2.5:1 ratio, with 2.5 bedrooms/units being counted as a single home. The scheme proposes to deliver 242 new student bedrooms in a PBSA facility, which is equivalent to 96 homes in the context of contribution towards achieving housing targets.

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

20. The proposed development would contribute to both PBSA bed space requirements and Islington's housing targets as set out in the London Plan. From a strategic planning perspective, the proposed PBSA is supported in land use terms however, prior to Stage 2, matters regarding affordable housing should be resolved (see the 'Housing' section below); and the LPA should appropriately secure the accommodation for use by students, as well as a nominations agreement for the majority of the student rooms as required by Policy H15.

Non-residential uses

21. London Plan Policy E9 promotes sustainable access to goods and services for all Londoners in line with the wider objectives of the Plan. The Local Plan site allocation seeks some commercial, community and social infrastructure uses.

22. The proposed development includes a café at the ground floor of Block C and a commercial/amenity floorspace in the PBSA block. The proposed commercial and amenity floorspace would provide amenities for future occupiers as well as existing local residents aligns with the site allocation. As such, the proposed non-residential floorspace is supported in land use terms.

Housing

Affordable housing

23. London Plan Policies H4 and H5 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. These policies in conjunction with the Mayor's Affordable Housing and Viability SPG; Affordable Housing draft LPG; and Development Viability draft LPG seek to increase the provision of affordable housing in London and embed affordable housing policy requirements into land prices.

24. To be eligible to follow the Fast Track Route, London Plan Policy H5 and the Affordable Housing and Viability SPG set a threshold of 35% affordable housing or 50% on industrial or public land (irrespective of grant funding). Paragraph 4.5.5 of the London Plan and Paragraph 2.36 of the Affordable Housing and Viability SPG provide a definition for public sector land, which includes land that has been released from public ownership and on which housing development is proposed. In accordance with this definition, the site, which was previously in public ownership and public land, and the scheme comprising housing development would mean that, for the purposes of Fast Track Route eligibility, the development would be required to provide at least 50% affordable housing or would be required to follow the Viability Tested Route. It is noted the Islington Local Plan requires 50% affordable housing by unit on this site.

25. Developments are also required to meet the specific tenure mix set out in London Plan Policy H6 along with other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor. London Plan Policy H6 and the Affordable Housing and Viability SPG set out a preferred

tenure mix for market housing schemes of at least 30% low cost rent (social or affordable rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority as low-cost rented homes or intermediate products based on identified need. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases flexibility may be appropriate, for example due to viability constraints or to achieve more mixed and inclusive communities. At a local level, the Islington Local Plan sets a requirement for 70% social rent and 30% intermediate housing.

26. When considering the housing delivered across the whole site, that is the C3 housing and the PBSA, the scheme would provide 30% affordable housing (C3) by habitable room, comprising 72% social rent and 28% London Living Rent (LLR) (intermediate), and 0% affordable student accommodation. It is noted the LLR housing is intended to be key worker accommodation for key workers at the adjacent Whittington Hospital. This amount of affordable housing falls short of the 50% requirement and does not comply with the established tenure mix. It is noted that when considering the C3 housing only the scheme would comprise 47% affordable housing by habitable room.

27. The Local Plan site allocation specifies "an element of student housing may be acceptable as part of the development mix, provided that the quantum of student accommodation is not held to weigh against both the provision of priority conventional housing on the site, and provided that it ensures that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant". Given, that the scheme does not provide the minimum 50% affordable housing by habitable room to follow the Fast Track Route in accordance with the London Plan and is therefore being viability tested by GLA Officers to ensure the scheme is delivering the maximum viable quantum of affordable housing.

28. The Applicant has submitted a Financial Viability Assessment (FVA) which is currently being scrutinised by GLA Officers. It is noted the FVA applies grant funding however, this has not been secured. The Applicant should engage with the GLA's Housing and Land Team to establish the availability of grant funding in order to confirm the FVA. The LPA is requested to share its viability advice with GLA Officers when available.

29. If approval is forthcoming, the LPA should secure early, mid and late stage viability review mechanisms via the S106 Agreement, in accordance with the approach set out in the Mayor's Affordable Housing and Viability SPG.

30. The Applicant should note that submitted applications that are required to following the Viability Tested Route will be required to pay the GLA's costs via an upfront payment of £10,000 plus VAT.

Affordability

31. The Mayor is committed to the delivery of genuinely affordable housing. London Plan Policy H6.

32. In accordance with Paragraph 4.6.9 of the London Plan, intermediate homes should be available to and affordable for households on a range of incomes below the maximum AMR income levels, which is currently £60,000 for intermediate rented products and £90,000 for shared ownership. Total housing costs should not exceed 40% of net household income. Local income thresholds must be secured for the first three months of marketing in line with Paragraphs 4.6.9 and 4.6.10 of the London Plan. Should any London Living Rent units be provided, the rents must be secured according to the relevant ward rental levels. Once agreed, these ranges and rent levels must be secured within any s106 agreement.

Unit mix

33. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need and demand; the nature and location of a site; and the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods.

34. The proposed unit mix is set out in the tables below.

Unit size	Block A	Block B	Block C	Total	Percentage
Studio	5	0	0	5	6%
1 bed	28	23	1	52	57%
2 bed	0	15	8	23	25%
3 bed	1	33	5	9	10%
4 bed	2	0	0	2	2%
Total	36	41	14	91	100%

Table 1: Proposed unit mix – affordable housing

Unit size	Admin Building	Holborn Building	Charterhouse Building	Total	Percentage
1 bed	0	19	3	22	25%
2 bed	2	21	5	28	32%
3 bed	12	20	2	34	39%
4 bed	1	1	1	3	4%
Total	15	61	11	87	100%

Table 2: Proposed unit mix – market housing

35. Prior to Stage 2 the LPA should confirm whether the proposed unit mix adequately addresses the identified local need. Where local need is not addressed, the Applicant should continue to engage with the LPA to agree a position.

Children's play space

36. London Plan Policy S4 states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m. per child. Play space should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe walking distance, and in these circumstances contributions to off-site provision should be secured by a s106 agreement. Play space should be available to all housing tenures to promote social inclusion.

37. A total of 933sq.m. of play space is required within the development in accordance with London Plan Policy S4. The proposal includes 653.6sq.m. of play space for ages 0-11, leading to an overall shortfall across all ages most notably for 12+ years. To address the shortfall, off-site provision is proposed to nearby Archway Park within 400m radius and very close to the site. Girdleston Park is also identified and lies just outside of the 400m radius. The LPA should secure this appropriately, including any required contributions, to ensure compliance with Policy S4.

38. The Council should be satisfied there would be no conflict between the proposed Block A ground floor service yard and adjacent playground in terms of safety.

Urban design

Development layout

39. Overall, GLA Officers are supportive of the masterplan principles and site layout, proposed location of uses, services and entrance at ground floor which would achieve a good balance between active and non-active uses along routes and open space, improving the townscape and legibility which is supported.

40. The proposed east-west route connecting Highgate Hill to Archway Road and the north-south route would achieve a greater level of permeability through the site and ultimately open-up the site to the public which is supported.

41. The proposed urban structure is street based which responds positively to local distinctiveness. The orientation and form of new buildings work harmoniously with existing historic buildings to frame new routes, creating a clear delineation between public and private spaces.

42. The bases of the buildings are animated and lively whilst entrances are highly visible, contributing to the pedestrian experience and the feeling of safety. Entry

points/routes into the site and public spaces are generously sized leading to an overall welcoming experience.

Tall buildings, scale and massing

43. Islington's Local Plan defines tall buildings as those above 30 metres. It states that tall buildings are acceptable in principle within site allocations where there is specific reference to suitability of heights of 30m or more; and/or within specific sites identified in a Spatial Strategy area.

44. The proposal includes buildings ranging from two to twenty-seven storeys in height. The proposed PBSA is the tallest at twenty-seven storeys and is therefore defined as a tall building. While the site is located within a site allocation (ARCH5: Archway Campus, Highgate Hill) and Archway Spatial Strategy Area (ASSA), it is not one of the three sites identified in the ASSA as suitable for tall buildings and as such would not meet the locational requirements of London Plan Policy D9 (Part B).

45. Notwithstanding the above, GLA Officers have taken into consideration the sites location adjacent to the Archway town centre and local amenities, the existing and emerging cluster of tall buildings, as well as the sites excellent PTAL rating of 6b due to its proximity to Archway and Upper Holloway Stations. These factors support the principle of a tall building on the site. Furthermore, in principle Officers are supportive of the proposed approach to height and the rationale of locating the taller PBSA block to the south, taking advantage of the falling land levels here and distance to the town centre. At the southern end of the site the PBSA would be seen as part of the emerging cluster around the station.

46. Blocks A, B and C are proposed between six and seven storeys along Highgate Hill which would appear to fit comfortably adjacent to the scale of retained historic buildings and within the wider context. The similar height throughout the site would reinforce the concept of a coherent identity which is supported.

47. Overall, the quantum of development would result in an appropriate balance between built form relative to the amount and proportions of public space and routes.

Tall building – visual impacts

48. A townscape and visual impact assessment (TVIA) accompanies the submission and includes views from various viewing locations. The assessment demonstrates that the proposal would not adversely impact mid-range and long-range townscape views and would make a positive contribution to the existing and emerging skyline, notwithstanding heritage impacts discussed in this report. This is due in large part to the elegant proportions of the tall building and its successful north south orientation where its slimmest proportions terminate major routes to the site.

49. The site does not lie within any LVMF viewing corridors although the proposal would be seen in the wider panorama of LVMF 1A.1 'Alexandra Palace'. The

upper storeys of the PBSA would be seen to the far right of the panorama, its base and middle would be obscured by development in the middle ground of the view. The proposal would break the horizon however, this is considered to add variation and interest. The buildings proportions and colour would not appear dominant or stand out unacceptably in the view, it would be seen as part of the urban form and background of the view.

50. The harm to heritage assets as identified in the heritage section of this report would need to be outweighed by the public benefits of the scheme. GLA Officers will conclude on heritage harm at the Mayor's decision-making stage once public benefits have been secured. See the "Heritage" section of this report.

51. The LPA should consider securing a condition relating to minimising light pollution from external lighting in line with London Plan Policy D9 (Part C(1)(h)).

Tall building – functional impacts

52. There is a clear servicing strategy that addresses how the buildings would be maintained and serviced.

53. The proposed mix, location, and quantum of uses, particularly the location of PBSA and public open space on the southern part of the site, would contribute positively to the vitality of the town centre.

54. Transport concerns should be addressed prior to Stage 2, as detailed in the "Transport" section of this report.

Tall building – environmental impacts

55. The applicant's technical information on environmental aspects is currently undergoing detailed review by the Council in order to assess the local impacts and identify whether additional mitigation measures are necessary to address these. This should include a full review of the potential daylight and sunlight impacts to neighbouring sites. Wind microclimate is also considered and the Applicant's assessment highlights two areas to the north and south of the PBSA building which require mitigation measures such as the inclusion of landscaping. The LPA should secure this mitigation appropriately.

Tall building – cumulative impacts

56. Given the proximity of the proposed twenty-seven storey PBSA to the existing and emerging tall building cluster around the station, the proposal would be seen as part of cluster. It would also be the tallest building within the cluster creating variety and hierarchy of scale which would result in an interesting skyline.

57. The detailed information submitted with regard to D9(C) will also need to be reviewed by the Council and GLA officers before an assessment against Policy D9 can be concluded.

Public realm

58. GLA Officers are generally supportive of the landscaping and public realm strategy. Various character areas are proposed, underpinned by establishing two distinct zones. The southern zone comprises public squares and terraces which would reinforce the character of the town centre and Navigator Square and is considered appropriate. The rest of the site would have an intimate green character befitting the predominantly residential nature of the site. Creating character zones and identifying potential locations for public art are integral to achieving a sense of place and strong identity.

59. GLA Officers are supportive of the retention of existing trees within the site, as well as proposed tree planting along routes and public spaces, as these would contribute positively to the character of Highgate Hill and Archway Road.

Internal quality

Residential

60. A total of 85% of new build units would be dual aspect and there are no north facing single aspect homes which is welcomed.

61. There would be less than eight units per core which is consistent with guidance set out in the Housing Design Standards LPG.

62. Floor plans indicate that all units have access to private outdoor space which is supported.

Student accommodation

63. Typical floors comprise studio accommodation. GLA Officers are generally supportive of the range and location of internal amenity spaces.

64. The external terrace would be directly connected and accessed from an internal communal space which should ensure the terrace is well used. Although the terrace is welcomed, GLA Officers note that it would be limited in its functionality and use due to its proportions. The Applicant should further explore external amenity provision above the pavilion building.

Architectural quality

65. GLA Officers support the architectural language which is thoughtful and engaging. The grid façade with its highly modelled brick frame provides depth and texture to elevations. The common architectural language throughout reinforces the identity of the site and creates a strong sense of place which is welcomed.

66. The PBSA building would have a clear tripartite composition comprising base, middle and crown. The two-storey base of the building would relate well to the human scale and the internal activity would animate and liven the public realm.

The top of the building is clearly defined by the grouping of the upper storeys within an elongated frame.

67. GLA Officers are supportive of the proposed material palette, comprising brick and precast concrete, which relates positively to retained historic buildings and to the surrounding context, and creates an overall visual cohesiveness throughout the proposed scheme. The LPA should secure the materials appropriately.

68. Overall, the scheme would be of high quality. As such, the LPA is encouraged to retain the original architects as design champions to ensure there is no diminution in quality during the build stage.

Fire safety

69. In line with London Plan Policy D12, applications must be accompanied by a fire statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

70. London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

71. The application is supported by a fire statement and a fire statement form which were prepared by a suitably qualified independent assessor. The fire strategy provides details on the building's construction; means of escape for all building users; features which reduce the risk to life; access for fire service personnel and equipment; provision for fire appliances to gain access; and consideration of potential future modifications to the building in accordance with the criteria set out at London Plan Policy D12.

72. Block A, the PBSA block and the Holborn Union building have residential accommodation with a floor height above 18 metres. These buildings would have at least two stair cases (three stair cases in Holborn Union). As confirmed within the fire statement, the top habitable floor in Blocks B and C, the student amenity building, Clerkenwell building and Charterhouse building would be under 18 metres and would have a single stair case. Evacuation lifts are also provided to all buildings.

Inclusive access

73. London Plan Policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum).

74. London Plan Policy D7 requires at least 10 per cent of dwellings be wheelchair user dwellings that meet Building Regulation requirement M4(3), and the remaining dwellings must be accessible and adaptable dwellings built to Building Regulations requirement M4(2).

75. The application submissions set out that at least 10% of the homes would be M4(3) compliant and all other homes would be M4(2) compliant. The LPA should secure this appropriately.

Heritage

76. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

77. The site forms the Holborn Union Infirmary Conservation Area and comprises buildings that were last used properly in 2013 and are in poor and declining condition. The conservation area is on Historic England's Heritage at Risk Register. In principle, finding a viable use for the buildings and ensuring their restoration is welcomed.

Demolition

78. The proposed development involves the demolition of buildings and structures within the Holborn Union Infirmary Conservation Area as identified in Table 3 below.

Building	**Significance**	**Harm identified**
1970s structures and extensions to the South Wing, Furnival Building, Ely Building	None.	Beneficial.
Furnival Building	None.	Beneficial.
Stapes Building (1877-79, by H Saxon Snell)	This Grade A locally listed building formed part of the original complex. While it is noted that these buildings are a fragment of a courtyard arrangement and that there have been repeated harmful alterations, particularly to openings, their demolition is harmful since historic interest will be lost.	Harm is caused by the demolition of this building, since historic interest and some architectural interest is lost.
The Link building, joining the Main and North Wings at lower ground floor level	Forms part of the original complex.	Harm is caused by the demolition of this building, since historic interest is lost.

The Nurses Wing	Historically a nurses' home and appears to have been partly built circa 1896 and then extended to the south and side circa 1905. While not part of the original complex and somewhat altered, this is a fair example of a purpose-built Victorian nurses' home and was designed to match the main complex in appearance.	Harmful since historic and some architectural interest is lost.

Table 3: Buildings proposed to be demolished

79. Further to the above, it is also noted that since pre-application stage the proposals have been amended such that the main surviving parts of the historic boundary treatment, which consists of dwarf bricks walls, brick piers and high-quality original railings, are retained and this is beneficial.

80. As shown in Table 3, the proposed demolition of the Staples Building, The Link building and the Nurses Wing would be harmful, and the demolition of the 1970s structures and buildings and the Furnival Building would be beneficial in heritage terms.

81. A suitable recording condition should be agreed for historic buildings which are proposed to be demolished, particularly the Furnival Building and the Nurses' Wing.

Proposed works to locally listed buildings

The Entrance Wing, Main Wing, South/Clerkenwell Wing and North/Charterhouse Wing all date from 1877-1879 and are by H Saxon Snell. All are Grade A locally listed buildings within the Conservation Area. The demolition of various modern interventions on the Main, Entrance, North and South Wings is proposed and is beneficial as it would turn the buildings towards their original form, which is quite well documented.

Proposed student tower

82. The proposed 27 storeys (82 metres) building would visually dominate the conservation area and the surroundings and would be highly prominent, even at some distance. In views 1 and 2 the proposed tower wholly blocks views of the locally listed buildings. The tower would also distract from appreciating the ventilation tower of the Main Wing which is a key marker on this historic site. As such, the proposal would cause less than substantial harm to the conservation area.

Proposed blocks A, B and C

83. Blocks A, B and C are located to the west of the locally listed buildings, in an area historically forming gardens for the infirmary patients. The Conservation Area Appraisal considers that this open space and the gardens on the site add to the significance of the conservation area. Although some of the original layout of two enclosed garden yards (one for males and one for females) with serpentine paths has previously been lost under detracting intervention, the west side of the site does retain a more open feel with many good and old

trees. The proposed development covers much of this open space and this causes some harm.

Harm to nearby heritage assets

84. Impacts of the proposed development on nearby heritage assets is set out in Table 4 below.

Designated heritage asset	Category of harm	Extent of harm	View reference
Highgate Cemetery, Registered Park and Garden, Grade I and the listed buildings within the RPG;	No harm	No harm	Views 14, 16
Waterlow Park, Registered Park and Garden, Grade II*;	Less than substantial	Very low	Views 24, 25
Roman Catholic Church of St Joseph, listed Grade II*;	Less than substantial	Low	Views 13, 25
St John's Church with St Peter, listed Grade II*;	Less than substantial	Very low	View 30, 32
Council Offices, listed Grade II;	No harm	No harm	View 30
The Whittington Stone, listed Grade II;	No harm	No harm	Views 20, 21
Number 20 Hornsey Lane, listed Grade II;	No harm	No harm	No view provided
Numbers 2, 4, 8, 10 and 10A Hornsey Lane, listed Grade II;	No harm	No harm	View 13 is nearby
St Joseph's Retreat, listed Grade II;	Less than substantial	Very low	View 13
F Block, St Mary's Wing, Whittington Hospital, listed Grade II;	No harm	No harm	No view provided
Belvoir Estate, listed Grade II;	No harm	No harm	No view provided
Church of St Mary with St Stephen, listed Grade II;	No harm	No harm	View 4 is nearby
St John's Grove Conservation Area;	Less than substantial	Middle	Views 1, 2, 19, 20, 27, 28, 29
Whitehall Park Conservation Area;	No harm	No harm	Views 7, 8
Highgate Hill/Hornsey Lane Conservation Area;	Less than substantial	Low	Views 14, 16, 22
Mercers Road/Tavistock Terrace Conservation Area;	Less than substantial	Very low	Views 3, 33
Dartmouth Park Conservation Area and the listed buildings within the area;	Less than substantial	Low	Views 13, 17
Highgate Village Conservation Area (LB Camden) and Highgate Conservation Area (LB Haringey) and the listed buildings within the areas;	Less than substantial	Very low	Views 10, 11, 12, 14, 16, 24, 25, 26
Holly Lodge Estate Conservation Area;	Less than substantial	Very low	View 15
Crouch End Conservation Area;	No harm	No harm	No view provided

Table 4: Nearby heritage assets

85. As shown in Table 4, the proposed development would result in no harm or less than substantial harm of a low or very low scale to most nearby heritage assets, with the exception of St John's Grove Conservation Area which would result in less than substantial harm of a mid-scale.

Heritage conclusion

86. At present, heritage benefits of the proposed development include the potential for the development to result in the removal of the conservation area from the Heritage at Risk Register; removal of detracting 20th century extensions and buildings from the site; and the restoration of the historic external fabric of the main buildings, together with the removal of detracting services and accretions. Notwithstanding, as set out in the paragraphs above, although there would be some beneficial heritage impacts, overall the proposed development would cause less than substantial harm to Holborn Union Infirmary Conservation Area and nearby heritage assets as set out in Table 4. As such, the proposed development is contrary to London Plan Policy HC1. It is considered the harm identified could be outweighed by the public benefits of the scheme, where GLA Officers are satisfied the maximum viable amount of affordable housing is secured. Until this exercise is completed officers are unable to conclude on the public benefits arising from the scheme and therefore the balance of these benefits against the less than substantial harm. The Applicant is encouraged to strengthen its public benefit offer, which could further include an increased level of affordable housing. This assessment will be undertaken at Stage 2.

87. Prior to Stage 2, the Applicant should maximise opportunities to reduce heritage harm and the LPA should ensure public benefits are appropriately secured. In accordance with the NPPF and the London Plan, GLA Officers will conclude on whether the public benefits outweigh the heritage harm at the Mayor's decision-making stage.

Transport

Transport for London Road Network (TLRN) network

88. Changes proposed to vehicle access on Archway Road A1 would protect and maintain existing cycleway and bus infrastructure which is welcomed. However, the exact works and impact on the connected TfL-operated highway must be clarified. Should the new highway access from A1 require adjustments to the public highway boundary or works within the TLRN red route boundary, these works must be funded and delivered by the applicant via S278 agreement. The full scope of TLRN highway works should be agreed with TfL prior to determination.

Trip generation and public transport access

89. The current trip generation analysis indicates a reduced impact on local public transport services during peak periods compared to the previous use. The Transport Assessment (TA) projects a 50% walking mode share overall for trips to and from the site in peak periods. Officers are concerned this may underestimate future bus, rail and LU impacts from the development proposals. The Applicant should engage with TfL and the Council to discuss this further to ensure the application complies fully with London Plan Policy T4.

Buses

90. Existing local bus infrastructure on Highgate Hill and Archway Road must not be disrupted during construction or operation. The proposals include a new loading bay for refuse collection on Highgate Hill, immediately next to an existing bus stop and bus lane. Refuse/loading vehicles are proposed to access the bay by crossing the bus lane immediately in front of the bus stop road markings, meaning buses and refuse/loading vehicles may conflict. Further engagement with TfL is required on this matter. Prior to Stage 2 the Applicant must demonstrate that the loading and access proposed could be safely delivered without increasing road danger or causing unacceptable impacts on bus operations.

91. Whilst basic vehicle manoeuvring analysis drawings for the proposed Highgate Hill loading bay have been provided in the TA, a Stage 1 Road Safety Audit (RSA) and Designer's Response are required prior to determination. The RSA must follow TfL's SQA-0170 - May 2014 procedure. The RSA and Designer's Response should be agreed with TfL.

92. The area could likely accommodate the new two-way bus trips expected to be generated by the development during AM and PM peaks. However, this is contingent on robust sense checking of the TA prior to determination and TfL maintaining and enhancing local bus priority and operational infrastructure.

93. TfL officers have concerns with bus stop changes that have a detrimental impact on bus operations as the operation of the bus network is sensitive to marginal changes in bus infrastructure, which can cause delays that in turn increase operating costs. TfL may request traffic modelling to demonstrate that proposed changes affecting bus infrastructure would not reduce the operability and accessibility of affected stops. The need for traffic modelling will be determined following receipt of additional information requested throughout the "Transport" section of this report.

Active Travel Zone assessment

94. The TA is supported by a daytime Active Travel Zone (ATZ) assessment of walking routes from the application site to key local destinations. While the daytime assessment is considered to be broadly acceptable, the Applicant should also prepare a nighttime ATZ assessment addressing the 'people feel safe 'Healthy Streets indicator as required by London Plan Policies T2 and D8.

Car parking

95. The scheme is car free except for Blue Badge space proposed at ground level in the potential inset loading bay proposed on Holywell Lane. Swept path analysis has been provided to demonstrate that vehicles accessing the various spaces and loading areas proposed would be able to enter, manoeuvre, and exit in forward gear. The one-way system proposed is particularly important due to the adjacent bus infrastructure on multiple sides of the site and is welcomed.

Cycle parking

96. The overall quantum of cycle parking proposed would comply with London Plan Policy T5. Full compliance with the London Cycle Design Standards (LCDS) in terms of design should be secured by condition.

Deliveries and servicing

97. The proposed servicing strategy broadly complies with London Plan Policy T7 and is supported.

98. The draft Delivery and Servicing Plan (DSP) submitted is accepted in principle, subject to a final, more detailed version being secured by condition.

99. Prior to Stage 2 the Applicant should clarify whether the loading bays proposed in the final arrangement would also be used during construction. This is crucial for determining the requirements for temporary and permanent S278 agreements.

Construction

100. A detailed final Construction Logistics Plan (CLP) must be secured by condition.

Infrastructure protection

101. The application site is within close proximity of London Underground and other TfL infrastructure. Planning conditions would be required to mitigate any impacts to TfL infrastructure and assets, including construction and structural impacts. Bespoke infrastructure protection provisions may also be required in the S106 and S278 agreements. The LPA and the Applicant should engage with TfL on the required mitigation.

Sustainable development

Energy strategy

102. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

103. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI 2, SI 3 and SI4. The Applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details

have been provided to the LPA and Applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Lean – clarifications on specification, correct modelling of student accommodation element and supporting modelling;
- Managing heat risk – Not currently compliant with Policy SI4 as natural ventilation scenario fails and active cooling has been proposed. further passive measures and details to demonstrate the cooling hierarchy has been followed.
- Be Clean – Further exploration of DHN potential with Archway Heat Network at this stage and energy strategy to be futureproofed for connection to future DHN;
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation.

Carbon savings

104. For the domestic element, the development is estimated to achieve a 84% reduction in CO_2 emissions compared to 2021 Building Regulations. For the non-domestic element, a 36% reduction is expected.

105. The development falls short of the net zero-carbon target in Policy SI 2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft S106 agreement should be submitted when available to evidence the agreement with the borough.

Whole Life-cycle Carbon

106. In accordance with London Plan Policy SI 2 the Applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

107. The applicant has submitted a WLC assessment. The WLC assessment does not yet comply with London Plan Policy SI 2. Further information is required on materials; refrigerants; and GWP table assumptions. Full details have been provided to the LPA and the Applicant under separate cover.

108. A condition should be secured requiring the Applicant to submit a post-construction assessment to report on the development's actual WLC emissions.

The template and suggested condition wording are available on the GLA website[2].

Circular Economy

109. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI 7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

110. The Applicant has submitted a Circular Economy Statement in accordance with the GLA guidance. The Circular Economy Statement does not yet comply with London Plan Policy SI 7. Further information is required on materials; refrigerants; and the template GWP table. Full details have been provided to the LPA and the Applicant under separate cover.

111. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[3].

Environmental issues

Urban greening

112. The proposal is targeting a 0.50 Urban Greening Factor score, which would exceed the minimum requirement of 0.4 set out in London Plan Policy G5. This is supported.

Sustainable drainage and flood risk

Flood risk

113. The site is in Flood Zone 1, greater than 1 hectare in area and in a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted.

114. This site is at a low risk of surface water flooding but is located adjacent to High and medium flood risk areas on the two public roads either side of the proposed development. The Applicant should provide further assessment of existing and proposed site levels to demonstrate that the risk to the site from the adjacent pluvial flood flow routes is low/appropriately mitigated.

115. There is the potential for elevated groundwater beneath the site at 2 metres below ground level. Given there is a basement proposed, groundwater

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

monitoring should be undertaken, ideally during winter months, to inform the exact mitigation measures required. This should be secured by condition.

116. The FRA adequately assesses the risk of flooding from sewer, which is considered to be low.

117. The LPA must engage with the relevant stakeholders to ensure that any issues relating to tidal, fluvial (main river and ordinary watercourses) and reservoir flood risks are resolved. This should ensure appropriate resilience measures are in place and any residual flood risk is managed over the lifetime of the development. This also includes provision of a Flood Warning and Evacuation Plan (FWEP) where necessary. Attention should be given to delivery of the measures set out in the Thames Estuary 2100 Plan and ensure the protection of the integrity of flood defences.

Sustainable drainage

118. The drainage strategy proposes to restrict runoff to 12.4 l/s up to the 100-year event plus 40% climate change. This is higher than the Qbar greenfield runoff rate of 6.81 and is not supported. To comply with London Plan Policy SI 13, every effort should be made to reduce discharge as close as possible to the Qbar greenfield runoff rate or robust justification must be provided as to why this cannot be achieved.

119. The drainage strategy proposes to provide the required attenuation within a combination of blue roofs, permeable paving and below ground attenuation tanks, which is supported. It is noted that the Flood Studies Report (FSR) method has been used for the estimation of rainfall for simulation of the drainage networks. This method underpredicts rainfall intensity in the London area. As such, the drainage simulations should instead use the latest Flood Estimation Handbook (FEH22) method.

120. In terms of SuDS, there is further opportunity for green/ blue roofs on the existing buildings that should be explored further. The Applicant should revise the drainage strategy to incorporate rainwater harvesting to ensure compliance with London Plan Policy SI 13. .

121. The LPA should also review SuDS maintenance arrangements; the assessment of exceedance flood flow routes; that the use of any pump discharges are appropriate; and the completed London Borough's version of the London Sustainable Drainage Proforma.

Water efficiency

122. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 L/person/day, in line with the optional standard in Part G of the Building Regulations, and is compliant with London Plan Policy SI 5.

123. No information is provided as to the targeted Wat 01 credits for the non-residential uses on site. This should be addressed prior to Stage 2 or secured by condition.

124. Water efficient fittings, water meters and leak detection systems are proposed, which is welcomed.

125. The Applicant should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

Air quality

126. London Plan Policy SI 1 states that development proposals should not lead to deterioration of existing poor air quality; should not create any new areas that exceed air quality limits or delay compliance in areas that are in exceedance of legal limits; and should not create unacceptable risk of high levels of exposure to poor air quality. Development proposals must be at least Air Quality Neutral and large-scale development proposals should provide an air quality positive statement.

127. An Air Quality Assessment was provided with the application. The assessment included a Dust Risk Assessment and Air Quality neutral calculation. An impact assessment of operational traffic was scoped out of the assessment, but dispersion modelling of future baseline concentrations was undertaken to determine site suitability. An Air Quality Neutral Assessment was also undertaken which concludes the building and transport emissions would be air quality neutral in line with London Plan Policy SI 1.

128. There is no statement as to whether the development includes backup generators. This should be clarified prior to Stage 2.

129. The LPA should secure conditions regarding Non-Road Mobile Machinery and an air quality dust management plan (or measures to control dust within a construction environmental management plan).

Biodiversity

130. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.

131. The Applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 8.54% in habitat units. The applicant should improve the Biodiversity Net Gain to at least the mandatory 10% for all BNG habitat units or higher if there are higher local targets. The applicant has stated that off-site offsetting would be needed to deliver the 10% net gain in habitat units. However, on-site biodiversity enhancements are preferrable, so the Applicant should seek to increase the biodiversity net gains on-site where possible, whilst following the mitigation hierarchy. This should be

referred to the LPA to review in more detail. Any off-site mitigation should be secured appropriately. The Applicant should also confirm that trading rules have been satisfied.

Local planning authority's position

132. Islington Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

133. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

134. There are no financial considerations at this stage.

Conclusion

135. London Plan policies on land use principles; housing; PBSA; affordable housing; urban design; fire safety; inclusive design; heritage; transport; sustainable development; and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles**: The scheme would delivery 178 new C3 homes and 242 student beds which is consistent with the site allocation and would contribute towards meeting housing targets. This is supported in land use terms.

- **Housing**: 30% affordable housing comprising 72% social rent and 28% LLR (no affordable student accommodation) is proposed. The scheme is following the viability tested route and an update will be provided at Stage 2.

- **Urban design:** The proposed site layout is broadly acceptable. GLA Officers will conclude on the acceptability of the proposed tall building at Stage 2.

- **Heritage:** The scheme would result in less than substantial harm to the conservation area and several nearby heritage assets. GLA Officers will conclude on the suitability of the tall building and the heritage harm at Stage 2.

- **Transport:** The Applicant and the LPA should engage TfL to resolve matters relating to impacts on bus infrastructure; trip generation; and extent of TLRN highway works. TfL Infrastructure mitigation should be secured.

- **Sustainable development:** Further information is required on energy; whole life-cycle carbon and circular economy.

- **Environmental issues:** The UGF score complies with the London Plan. Further information is required on sustainable drainage and flood risk; air quality; and biodiversity.

For further information, contact GLA Planning Unit (Development Management Team):
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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

APPENDIX 3 – Design Review Panel Response 8th February 2024

ISLINGTON
For a more equal future

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Our Ref: Q2022/2906/PPA 2nd Review

February 8th 2024

Dear Jonathan

ISLINGTON DESIGN REVIEW PANEL - MEETING NO 2 – ARCHWAY CAMPUS
JANUARY 22ND 2024

This is the summary note from Islington's Design Review Panel following the meeting held in person at Islington Town Hall, on 22nd January 2024. It was the 2nd Review of the proposed development scheme at the Archway Campus (with Severn Capital as applicant).

The scheme is for the demolition of existing buildings on the site, facade retention and conversion to private residential of the Holborn Main Range and Admin block, and the Charterhouse and Clerkenwell buildings, erection of 3 new buildings to Highgate Hill for social rent, erection of a 25 storey tower for student halls to the south west edge of the site with an ancillary two storey building to the south east corner, a new internal road and associated landscaping.

Review Panel
The Design Review Panel provides expert impartial design advice following the 10 key principles of design review established by Design Council/CABE. The scheme was reviewed by Richard Portchmouth (Chair), Dominic Papa, Clare Murray, John Bushell and Michelle Ludik. The Panel also included a 'next generation' panellist, Ella Daley from the London School of Architecture

The views expressed below are a reflection of the Panel's discussions as an independent advisory body to the Council.

In summary, the Panel maintains its support for the principles of the masterplan and the associated urban form which are considered of merit. The landscaping was also commended as was the architectural quality.

There was support for the height and massing of the three social housing blocks and their architectural expression.

With regard to the tower, the Panel welcomed the reduction in height but was disappointed with the incompleteness of the views analysis work. This limited the Panel's ability to fully appraise the impact of the tower particularly from the longer views and settings and the critical LV5a view. While the architecture of the tower was supported in principle and close up views considered successful, the impact of the tower on the townscape and broader settings remains untested in some key views and therefore could not be fully considered by the Panel.

The lack of definitive technical information relating to the microclimatic impacts associated with the tower was noted although the positive trajectory was commended. The Panel reiterated the importance of assessing the tower in relation to these two elements – views and microclimatic conditions - going forward.

The approach to the historic buildings was supported in principle including the treatment of the proposed 'book ends' but again the Panel was disappointed that the scheme is at an architecturally advanced but without the benefit of full survey information to substantiate the design.

The Panel was particularly concerned about the energy and sustainability properties of the proposal and the implications associated with the development from managing the need for off site depositing of large amounts of spoil arising from such extensive cut requirements, the uniformity of fenestration to the new build blocks regardless of orientation, to the apparent incompleteness in demonstrating the scheme's energy efficiencies.

Panel Queries

Physical Model Request: For such a large scheme disappointing not to be presented with a physical model. Is there one?
Response: There is a model but it has not been updated with the reduced height of the tower and so was not presented.

Connections across the gyratory: Connections between the proposed Clerkenwell Square and Navigator Square, to the south of the gyratory, do not appear to have progressed. Have discussions been ongoing with TFL and LBI to improve these?
Response: The applicant is cautious about making commitments outside of the redline/ownership boundary which may therefore not be deliverable and is focusing more on what is known to be deliverable.

Views Analysis LV5: The view is included in the pack but no building is indicated making assessment of the impact on this important view impossible. Have you got that information now?
Response: LV4 view is not impacted upon. LV5b is not impacted upon. LV5a – the building clips the edge of LV5a. However, it does not encroach any further than the archway tower. Work is in progress to update the wirelines with the revised (lowered) tower.

Public realm: Is the site completely open to the public or is it wholly or partially gated?
Response: The site is to be open to the public save for the 'mews' street to the north of Block A and the area of land to the north side of Charterhouse which is also overshadowed and protected by a high boundary wall and is to contain plant.

Landfill: With such a lot of cut for levelling shown, a lot of fill is to come off the site. Is this factored in to cost and sustainability? Does the approach need to be reconsidered?
Response: Cut has to happen to achieve the required levels including the 1:21 gradients. There is simply not enough ground plane to meaningfully accommodate the fill and so it will be taken off site.

Block B 2nd Staircase: Why only 1 staircase given above 18m?
Response: Compliant with a single staircase given the deck access and corridor distances

Play provision and unit reduction: With the significant unit reduction, the ratio of open space to resident population is likely to have beneficially increased. Has this also improved the ratio of play space to child yield?
Response: To be further explored. Currently policy compliant for all but the 12+ age bracket.

Housing Fenestration: Do the new build blocks have the same fenestration proportions and detailing regardless of aspect?
Response: Yes. They have a 30-40% ratio of solid to void. However the tower's fenestration and façade detailing changes in accordance with aspect.

Historic buildings: Big challenge with a façade retention scheme and insertion of new windows.
Response: it is anticipated that there will be existing bricks that are restorable and reusable. Where new bricks are required to infill repairs, these will be washed to achieve a historic patina and lime mortar blend applied. The design team has tried to isolate infilling of brickwork requirements to areas where it is absolutely necessary.

Net zero carbon targets : What are you achieving?
Response: 81% improvement over ADL; meeting GLA benchmarks

Passiv Haus: What specific principles are being targeted?
Response: U values are guided by RIBA standards and it is these standards that are being targeted.
In the historic buildings a 150mm zone allowance has been designed in to provide internal thermal linings Including internal linings to new and/or retained roof structures.

PVs and ASHPs: Are these for both historic buildings and new build?
Response: ASHPs will service historic buildings – large plant located to the northern boundary of Charterhouse. Will make use of the voids associated with the existing vents minimising disruption to fabric of buildings. No PVs to roofs planned. New build to have both PVs and ASHPs.

Bricks: Full brick work or brick slips?
Response: Prefabricated panels to be made with combined/integrated pre cast concrete and full bricks.

Overheating Assessments: Have these been undertaken?

Response: Yes – where risks have been identified these have been mitigated including eg balcony designs and positioning. Windows to the tower are sealed for health and safety reasons. Have assumed windows closed to street frontages due to noise and have added booster cooling elements where required. Natural ventilation has however been achieved to the majority of homes.

Embodied Carbon: No information regarding embodied carbon and the historic buildings. Is this just a façade retention scheme?
Response: Assumption is that roofs can remain and if they need to be rebuilt they will match exact pitch and finish. Don't yet know if the structures are strong enough to accommodate additions to the roof and new internal structures, But the aspiration is an envelope retention as opposed to façade retention. Unable to keep the internal columns and achieve fire safety measures. The façade though is load bearing which helps.

Level changes: Are you creating new basement floors or reinstating the lower levels and how does that work with the contouring?
Response: Have established existing foundation depth and won't need to do any underpinning as the works will not be exposing any of the foundations – save for the southern façade of the Clerkenwell Building which is being exposed and a further floor added at base.

Why is the nurses home not suitable for affordable Housing?
Response: Believe the previous owners looked at this and discounted it; our assessment could only achieve 27 student halls; need site coverage for more intensive yield for viability purposes.

Secure by Design: Has it been assessed by secure by design officers?
Response: Some discussions have taken place. However, the advice was for less permeability and greater restriction on pedestrian movements. The local authority has however encouraged a more open approach which has been followed. Two linear spaces along the northern boundary have however been secured for security and functionality purposes.

Amenity building to Clerkenwell Square: Are any of these student amenity spaces within the buildings open to the public?
Response: The upper floor amenity space of the new building to the south eastern corner of the site, facing into Clerkenwell Square, could have some public accessibility but the programme has not been fully considered at this stage. The amenity space to the top of the tower is unlikely to be open to the public. The squares and communal garden to Highgate Hill edge, and the playground, will be open to the public.

Wind analysis: Has this been completed?
Response: A further wind tunnel modelling exercise is to be undertaken next month based on the reduced tower. Other wind studies show a compliant scheme with Navigator Square showing an improvement in respect of wind impacts. Anticipating good results in this regard.

Extent of basement Cycle Park & Tree Impacts: Caution to select suitable trees and have enough base for tree growth – need to ensure trees don't just blow over as is being witnessed in some other London schemes.

Re-use of historic features: Have you a strategy for reuse of historic elements such as historic staircases and other joinery etc?
Response: Mostly focusing on reuse of bricks. The existing stairs are designed for floor heights that are not being retained therefore cannot be reused. Existing historic wrought ironwork is however being retained where feasible.

PANEL COMMENTARY

Masterplan

The Panel commended the presentation. It also expressed ongoing support for the masterplan with the successful disposition of the various elements of the scheme and the associated clarity in terms of space. The morphology feels appropriate and the scale and variation of affordable housing blocks, and their setting out, feels 'right'. The grading of the site is a good response to creating a useable and accessible public realm.

The Panel noted that a great strength of the masterplan is that it allows the existing heritage buildings to be read and reinforced as a 'set piece' composition. This approach was more successful than the previous designs by others for the site.

The Panel considered that the Highgate Hill blocks successfully reflect a campus morphology and considered these are a successful contribution to the site and to the context, effectively 'holding' the Highgate Hill frontage. The positioning of the buildings entrances and lobbies all reinforce the sense of campus and are complementary to its character.

The granularity of the plan and permeability through the site remain strong positive attributes of the masterplan. The Panel noted its appreciation of the refinements since the last DRP to the quality of the landscape including with regard to play on the way, the proposed playground, and the removal of excessive overshadowing.

However key to the masterplan's success remains convincing information with regard to microclimatic conditions and completion of the views assessment studies in order for a fully informed assessment of these key aspects to be made.

The Panel did however express some disappointment about the accommodation of utilities in new buildings fronting on the new square.

Architecture

The architecture, materiality and landscaping were noted by the Panel as being very well considered. But while the Panel admired the architecture and the attention to urban grain, there was an element of concern as to the 'solidity' of the facades of the three social housing blocks arising from the ratio of void to solid. Some of the north facing rooms could be challenged with regard to sunlight and daylight. The Panel queried whether the amount of projection to the piers could respond more directly to the façade orientation to reduce the density of the facades.

The Panel considered the architecture of the tower to be appropriate with an emerging elegance and urbanity to it and noted that it feels more comfortable from close up perspectives and views. The Panel noted that the tower is of a design that far exceeds the quality of the existing adjacent towers and that adding another tower, of such an enhanced design to the cluster, is acceptable in principle.

The layout of some of the student rooms in the tower was queried with some potentially awkward spaces adjacent to the beds and/or desks in the location of the piers noted.

The base will be heavily populated and the junction with the gyratory is notoriously difficult. The Panel advised that this interface will need to be robustly designed including testing that the trees will be able to withstand wind and other climatic conditions.

There was a Panel suggestion that instead of a 54% affordable housing offer, this could be reduced to 50% and the student units reduced accordingly with some further reduction to the height of the tower as a result. However, there was a Panel counter argument that considered that the increased % of affordable housing can go some way to accepting a tower in an area without a high building designation and therefore the balance should remain.

With regard to the historic buildings, the architectural approach was welcomed and supported. In particular the Panel welcomed the new 'bookends' and considered a successful rhythm has been achieved with regard to the bookends and the Main Range. However, the Panel expressed concern that details have been worked up without the benefit of full survey information which is unfortunate at this late stage in the designs and could have significant impacts on the design going forward.

The Panel queried the proposed expression of new entrances within the historic fabric. These are expressed as round Romanesque arch openings within the existing defined historic character of Gothic style pointed arches by the architect Henry Saxon Snell. This needs to be explained and justified as an appropriate intervention within and addition to the existing historic fabric.

The Tower

The architecture of the tower was supported by Panel including its emerging 'elegance and urbanity' and its height was considered less of an issue in the near views. The absence of a complete views analysis and incomplete microclimatic testing hinders the Panel's ability to comment fully on its impact in respect of setting and microclimate, both of which are critical considerations.

The Panel note the difficulties of the junction with the southern edge of the site, the gyratory, and given this area will be heavily populated this interface appears somewhat unresolved. The nature of the Peninsular site is noted but the panel advised that the more that can be done to strengthen connections across the gyratory the better. Discussions should continue with TfL to help achieve this objective.

Materials

Heritage building – The Panel generally supports what is proposed. There was some discussion as to whether the new 'book ends' need to be in the same brick or whether they could be in a different material that contrasts with the original brick?

The materiality of the Highgate buildings is supported by the Panel.

Heritage and Townscape
The Panel, while acknowledging the challenging context and site with multiple elements to balance, was supportive of the approach taken to the heritage buildings. However there remains concerns about the extent of demolition within the retained buildings and that the scheme designs have progressed without the benefit of full survey information. The Panel advised that, depending on the survey findings, these could have a profound impact on the deliverability of the scheme as proposed. The Panel advised that detailed survey work is critical to inform and justify impacts of demolition on the conservation area including the loss of historic fabric. There are also concerns about impacts on existing heritage buildings in respect of such a loss of historic fabric – taking roofs off and floors out. Trying to run new floors against windows is hugely difficult and the applicant is advised to pull back from that approach.

The Panel raised the issue of how much building fabric can you get rid of before 'retention' is no longer meaningful. Irrespective of the embodied carbon issue, there is an urgent need to understand how existing to new glazing impacts on the floors etc., and a better understanding is needed as to what is existing versus what is proposed and how much is actually being removed from the heritage buildings.

The Panel would like to be able to assess a detailed bay in order to better understand the quality of the detailing which will be so important to the success of the interventions to the heritage buildings.

The objective should be to retain as much of the original fabric as possible including detailed elements such as the metal grills, filigree panels, and even the historic sets in the floorscape given these details add to the character of the historic buildings and to their setting.

And the character of the place is all important with the history of the site needing to be respected and protected wherever possible.

With regard to Townscape and Views the Panel noted the absence of a complete set of views impact analysis which prevented the Panel from making a full assessment of the impact of the proposed tower. The Panel noted that the tower will be dependent to a large extent on planning balance. In the near views the Panel considered that the tower sat more comfortably adjacent to the cluster of 1960s towers to the west but that it is in the longer range views that the impact of the tower will likely be more acutely felt. The Panel advised that more work is needed to demonstrate the tower's impact on the setting as seen from longer range views. It would inevitably sit more comfortably were it lower. The Panel noted that the lantern top is very successful architecturally as is the treatment to the base. However it is a long middle in relation to the scale of the top and base elements. The Panel advised to test the tower with the reduction of a 3 further 'middle' floors. By reducing its height, the Panel advised that the tower would sit more comfortably in relation to the setting of heritage assets.

Environmental Issues
The Panel acknowledged the efforts made to address previous environmental concerns, however an outstanding concern is that the fundamentals of environmental design are still being overlooked. The window ratios -the void to solid ratios – are one of the most apparent possible failures and the design team is reminded that is has the ability and responsibility to mitigate impact on climate change.

The failure of the applicant to share some of the sustainability figures with the Panel – assuming they have been calculated – was disappointing.

Operational carbon
Affordable and student

- The building forms remain relatively compact which is positive.
- The Panel cautioned against the use of words like passivhaus principles given the window areas alone are not in line with passivhaus, and triple glazing is not used. The Panel was curious to know the Energy Use Intensity and Specific Heating Demand.
- The Panel considered this is a serious missed opportunity to vary window sizes to respond to orientation.
- The design team stressed the minimisation of superfluous envelope with the simple form but the Panel suggested further thought is given to the 'add ons' e.g. Fins/Piers are on the north elevations - this is expensive and unnecessary and reduces heat gain in winter while increasing heat loss through thermal bridging.

Retrofit

- Once in 50+/100 year opportunity to retrofit the existing buildings - it would have been good to see targets set for the retrofit. However the Panel is encouraged by the proposed 150mm zone of wall insultation.

Overheating

- Window areas appear to be grossly outweighing the wall area and do not respond to orientation. It appears more like 50-60% glazing on all facades - this is akin to an office building. This should be more like 25% on south, 10% on north and 15-20% on E+W. By these measures the Panel has concern for the new builds.
- Shading – The Panel applauded the shading study of fins/piers but questioned whether it is meaningful shading for southern summer sun noting the need to prevent sun coming in window in summer. Something more positive would be to raise the height of the sill which would improve the shading.
- Adaptability of student accommodation into housing is positive for circular economy, however the window operability is in question. The Panel felt it was odd to treat the schemes differently (general needs residential and student halls) given people live in them both.

Whole Life Carbon (WLC)

The Panel advised of the real need to set WLC targets (a combination of operational and embodied targets) and design to meet them adding that targets should not be added later and the designs shoehorned into the targets. Use of SAP is not conducive to meeting these targets although it is accepted that the GLA allow this.

The Panel welcomed the reference of Embodied Carbon but queried what will be done to reduce it - façade studies? structural studies?

Daylight

External sunlight and daylight matters appear to have been resolved.

The Panel advised that by painting the soffit of inset balconies in a light colour, daylight and the perception of daylight, would be enhanced.

Chair's Summary

The Panel maintained its support to the general arrangement of the development on the site and the masterplan in general. The Chair commented that the layout supports and enhances the retained heritage buildings and allows them to be read as a set piece composition. The masterplan reinforces the Holborn

Infirmary site as a campus. Landscape and infrastructure combine with architecture to create coherence and gravitas to this heritage site.

The quality, form and scale of the Highgate Hill blocks are supported although the Panel advised that some variation to fenestration proportions should be examined in relation to aspects.

The Panel supports the tower in principle and welcomed the reduction in its height from the previous DRP. The Panel considers its architecture to be of a suitably high quality of design and that it offers the potential to uplift the appearance of the wider cluster of neighbouring tall buildings. However, the Panel advises that further detailed microclimatic and views analysis work remain outstanding. With respect to the impact on the setting of heritage assets the Panel advised testing a reduction of the tower by three further residential floors to assess the reduced impact that a lower tower would have on the longer range views and settings. The Chair mooted that in addition to townscape benefits the reduction in height of the middle section of the tower would improve the proportional balance with the base and crown of the building and an overall enhanced appearance.

To the southern apex, the arrangement of space enhances connection and integration of this peninsular site, and this approach remains viewed positively by the Panel, However the Panel reiterated its earlier advice for the applicant to engage more fully with TfL and LBI with regard to achieving the best possible connections including the potential for a Copenhagen type raised road table and change in floorscape.

The Panel, while remaining supportive of the design approach to the retained heritage buildings on the site, including the insertion of two new 'book ends' to the Main Range, expressed disappointment that the work is not informed by detailed survey work. The Panel advised that this could have a profound impact on the schemes current detailed designs.

The Panel considered the approach to the public realm and landscape reinforces the masterplan and was of a suitably high quality and is therefore supportive of it.

An area of important concern to the Panel focused on energy efficiency and sustainability measures which were considered to fall short of expected standards. The Panel advised that this area of work needs to be considerably strengthened.

The Chair highlighted that all these factors importantly require resolution and will be critical to assessing the overall merits of the design proposals and the 'planning balance' in relation to heritage aspects of the scheme.

The Panel would welcome the opportunity to review the proposals when the design team has had the opportunity to respond to the comments raised in this report and preferably ahead of a formal planning application.

Confidentiality

Thank you for consulting Islington's Design Review Panel. If there is any point that requires clarification, please do not hesitate to contact me and I will be happy to seek further advice from the Panel.

Please note that since the scheme is at pre-application stage, the advice contained in this letter is provided in confidence. However, should this scheme become the subject of a planning application, the views

expressed in this letter may become public and will be taken into account by the council in the assessment of the proposal and determination of the application.

Yours sincerely

Linda Aitken

Head of Design and Conservation
Islington Council

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