

Seven Capital (Highgate Hill) LBI Highways Response Note

SLR Project No.: 425.065924.00001

26 August 2026

Revision: 02

RE: ARCHWAY CAMPUS, HIGHGATE HILL [REF: P2024/2598/FUL]

1.0 Introduction

- 1.1 SLR Consulting Ltd (SLR) has been retained by Seven Capital (Highgate Hill) Ltd ('the Applicant') to provide highways and transport advice in relation to a planning application for a mixed-use residential development located at Archway Campus, 2-10 Highgate Hill ('the Site'). The Site is located within the London Borough of Islington (LBI).
- 1.2 The proposals seek to redevelop the Site to provide 178 residential units, 242 student accommodation units and 116sqm of ancillary commercial floorspace ('the Proposed Development'). The Site is proposed to be car free except for 7 Blue Badge (BB) parking spaces (6 spaces associated with the residential use and 1 space for the student accommodation).
- 1.3 A planning application was registered on 24th September 2024 (Ref: P2024/2598/FUL). The application was supported by a Transport Assessment (ref. '425.0014221.00001') dated 18th June 2024 which outlined the development proposals and identified associated transport impacts. On 18th March 2025 the application was refused by LBI with 14 reasons for refusal listed.
- 1.4 In May 2026, following comments from Steer Ltd on behalf of LBI Highways and comments and discussions with TfL, a Transport Assessment Addendum (TAA) was prepared by SLR in relation to the latest proposals and with regard to the comments raised. Appended to this document were supporting transport documents:
 - Framework Travel Plan
 - Outline Delivery Servicing Management Plan
 - Outline Construction Logistics Plan
 - Outline Car Park Management Plan
 - Outline Student Management Plan

- 1.5 In response to the submission of these documents Steer has provided a number of comments on behalf of LBH highways. The full Steer response is provided at **Appendix A**.
- 1.6 This Note has been prepared to respond to these comments. This Technical Note provides a response to the points raised in their respective order. Where relevant, the Officer's response is quoted in italics, with the SLR response below.
- 1.7 The Officer Comments were presented in sub-sections within the document (**Appendix A**). These sections are replicated verbatim within this Note. All comments have been provided within this Note, where a response is not required this has been stated.

2.0 Steer Comments and Responses

Further Information Required

Steer Comment 1

More detailed co-ordinated public realm drawings need to be provided showing how the proposed building footprints interact with the public realm, and in turn its interaction with parking/ servicing bays, short stay cycle parking, and circulation.

SLR Response 1

- 2.1 Additional details are discussed within this Note. Any additional detailed Landscape drawings can be provided in line with a suitably worded condition.

Steer Comment 2

Although much improved from previously, a further review of residential Blue Badge parking locations is required to ensure all residential core entrances are within 50 metres.

SLR Response 2

- 2.2 This review has been completed as is detailed within the Car Parking section of this Note.

Steer Comment 3

Further details are required in relation to the potential location of Car Club spaces on surrounding streets with costs secured by contribution.

SLR Response 3

- 2.3 This review has been completed as is detailed within the Car Parking section of this Note.



Steer Comment 4

Although improved from previously, drawings should be reviewed to enhance cycle routes/ access arrangements through the scheme. More detail is required on the site vehicle access points to demonstrate they can be modified to accommodate two-way cycling on the east-west route.

SLR Response 4

- 2.4 Access drawings have been prepared to provide more detail, as requested, these are provided at **Appendix B**. The introduction of a contraflow cycle lane is considered to be unnecessary, as detailed within the Servicing/circulation section of this Note.

Steer Comment 5

Further detail required on the connection between the scheme and the Highgate Hill cycle crossing leading towards Navigator Square.

SLR Response 5

- 2.5 This review has been completed as is detailed within the Servicing/circulation section of this Note.

Steer Comment 6

Clarification is required on the proposed long stay cycle parking and use of Block B by Admin/ Holborn building residents to offset the small shortfall in long stay spaces. Further review required of short stay cycle parking calculations as these fall below policy requirements.

SLR Response 6

- 2.6 Both long and short stay cycle parking queries are addressed within the Cycle Parking section of this Note.

Steer Comment 7

Further justification required for not meeting accessible cycle parking space requirements in the Student Tower and on access arrangement to the Holborn basement cycle store.

SLR Response 7

- 2.7 Long stay cycle parking queries are addressed within the Cycle Parking section of this Note.



Steer Comment 8

Further details required on dockless cycle parking provision.

SLR Response 8

- 2.8 Dockless cycle parking has been considered, as detailed within the Cycle Parking section of this Note.

Steer Comment 9

Further review required of the eastern two-way servicing route and further details required of signage and enforcement and site vehicle access points.

SLR Response 9

- 2.9 This has been reviewed and is summarised within the Servicing/circulation section of this Note.

Steer Comment 10

A drawing is required that clearly details the proposed amendments to the site vehicle access points, overlaid on the existing highway layouts.

SLR Response 10

- 2.10 These drawings have been prepared and are provided at **Appendix B**. This is detailed within the Servicing/circulation section of this Note.

Steer Comment 11

All references to the Highgate Hill loading bay need to be removed from reports.

SLR Response 11

- 2.11 This has been addressed. Any references that were remaining have been removed.

Steer Comment 12

Further content required in DSMP to set out comprehensive targets, measures, an action plan and the monitoring strategy.



SLR Response 12

- 2.12 The content within the Outline DSMP already includes information in line with the TfL Delivery and Servicing Plan Guidance document (December 2020). Notwithstanding, the comments are noted and generally provide an enhancement on the information already provided. The inclusion of the information requested is detailed within the Delivery and Servicing Management Plan section of this Note.

Steer Comment 13

Clarification required on operational waste strategy including basis of calculations and shared usage of waste stores. Waste volume calculations do not appear to reflect LBI guidance requirements.

SLR Response 13

- 2.13 This is detailed within the Waste Management Plan section of this Note.

Steer Comment 14

Additional information requested on Student Move-in and Move-out strategy.

SLR Response 14

- 2.14 This is provided at the Student Access Management section of this Note.

Steer Comment 15

More detail is required on proposed construction arrangements, programme, trip forecasts, routing, site layout and mitigation measures. There is a need to avoid residential streets.

SLR Response 15

- 2.15 Where possible, the additional information requested has been provided. However, given that this is only an outline document (in accordance with published TfL guidance). As the Principal Contractor is not yet appointed, some of the information requested is not available at this time. This is detailed within the Construction section of this Note.

Steer Comment 16

Travel Plan action plan needs to be enhanced to include more comprehensive measures.



SLR Response 16

- 2.16 These measures have been reviewed and are considered to be appropriate considering the TfL Travel Plan guidance. This is detailed within the Travel Plan section of this Note.

Car Parking

Steer Comment 17

A car free scheme with seven Blue Badge only parking spaces is supported (subject to the comments about access distances – see below). This comprises:

- ***1 space for the student element.***
- ***Six spaces for the C3 residential units (3.6%) which is just above the minimum requested number of Blue Badge spaces from the outset to meet London Plan Policies T6 and T6.1.***
- ***No Blue Badge spaces are proposed for the commercial use.***

SLR Response 17

- 2.17 Noted, no further action at this stage.

Steer Comment 18

It is accepted that, due to site constraints, it will not be possible to meet the Islington Local Plan minimum requirement for 10% provision of Blue Badge spaces (Policy T3 Part G) on site for C3 residential units, which is also the London Plan aspiration (see paras 5.36 – 5.39 of the HSTAA and London Plan Policies T6 and T6.1). Instead, LBI will apply the relevant provisions of the April 2025 Planning Obligations Supplementary Planning Document (SPD), to collect a contribution towards sustainable transport measures. Based upon the currently proposed provision, there is a shortfall of 11 on-site Blue Badge spaces for the C3 residential element and one on-site Blue Badge space for the commercial element, i.e. a shortfall of 12 spaces. Therefore, LBI will be seeking a Sustainable Transport Contribution of £60,000, i.e. 12 spaces @ £5,000. (Please note this supersedes the earlier contribution of £2,000 per space referenced in our March 2025 comments).

SLR Response 18

- 2.18 The principle of a financial contribution is accepted.

Steer Comment 19

All vehicular parking spaces should be provided with electric vehicle charging from the outset.



SLR Response 19

- 2.19 This is accepted in line with the Building Regulations Part S which outlines at Requirement S1 that for the erection of a new residential building the total number of spaces which have access to EV charge points should be:

(a) the total number of associated parking spaces, where there are fewer associated parking spaces than there are dwellings contained in the residential building;

Steer Comment 20

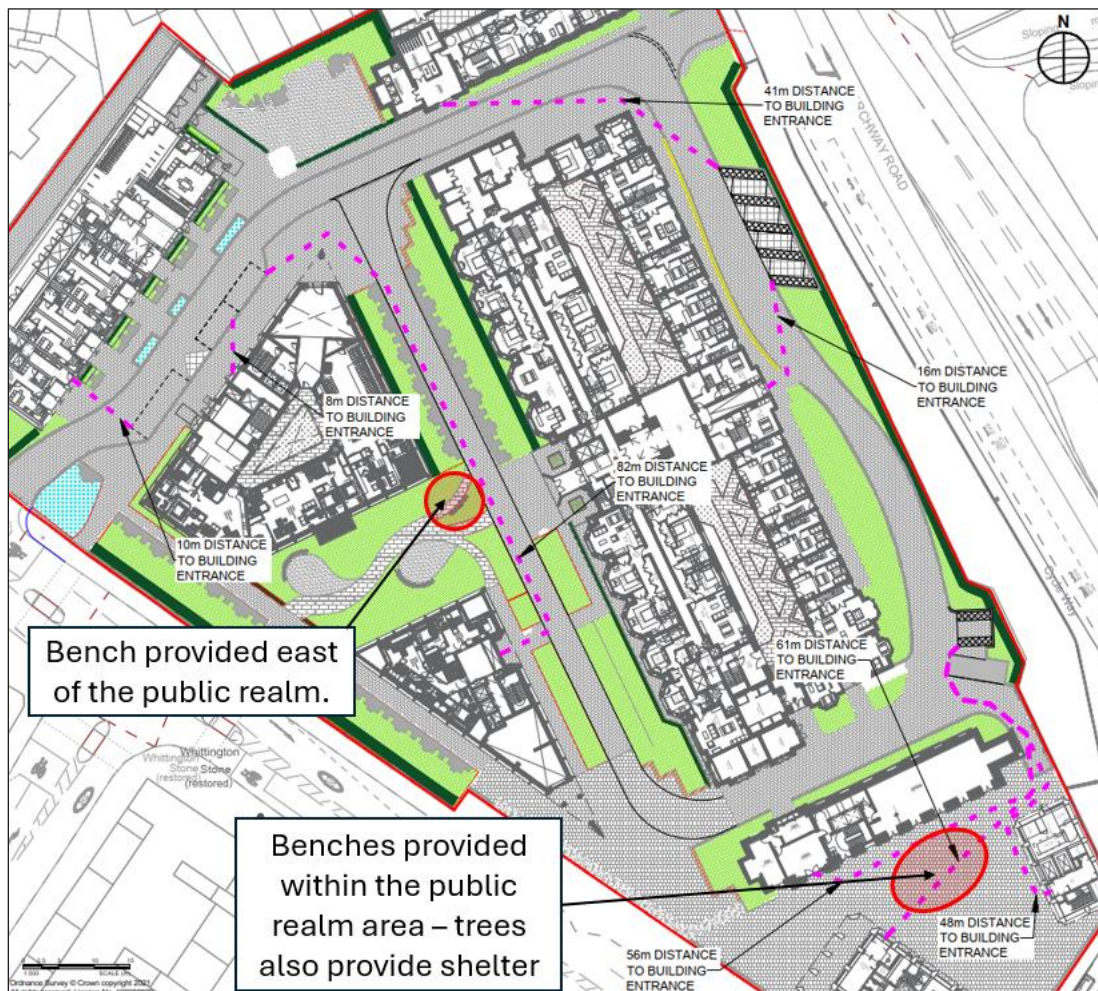
Figure 5.7 within the HSTAA shows the distances between the buildings and Blue Badge spaces. Some of these distances are significantly exceeded. The distance from Block C to a Blue Badge space is 82m and the distance from the Clerkenwell building (56m) and Student building (61m) exceed the minimum 50 metre requirement. If the distances are exceeded, level resting places should be identified and provided. Consideration should be given to reducing these distances by finding space to accommodate another space towards the southern end of the masterplan -see potential area of search on drawing at Appendix A

SLR Response 20

- 2.20 The above is noted. Regarding resting places, these are proposed to be available in suitable and convenient locations where walking routes exceed 50m. These locations are marked within the plan below and in the proposed landscape plans.



Figure 2.1: Distances to BB Bays



- 2.21 Regarding the provision of a new parking bay to the south of the Site. As shown in Figure 5.6 of the TAA, alternative locations have already been considered. A parking space in the location suggested by Steer would not be possible as this is within the proposed sustainable transport corridor which will have restricted access. A parking space would also then be located within a key area of public realm which has been designed primarily for pedestrian activity and not the presence of cars. Hence, it is not considered appropriate or necessary to provide a parking bay in this location.

Steer Comment 21

The S106 agreement must include provisions excluding residents from applying for on-street parking permits in the surrounding CPZ.

SLR Response 21

- 2.22 Noted and agreed.



Steer Comment 22

The Outline Car Park Management Plan shows indicative locations as icons on Figure 2.3, however, no context is provided to show whether there is space on the actual streets to accommodate the bays and what facilities might be lost.

SLR Response 22

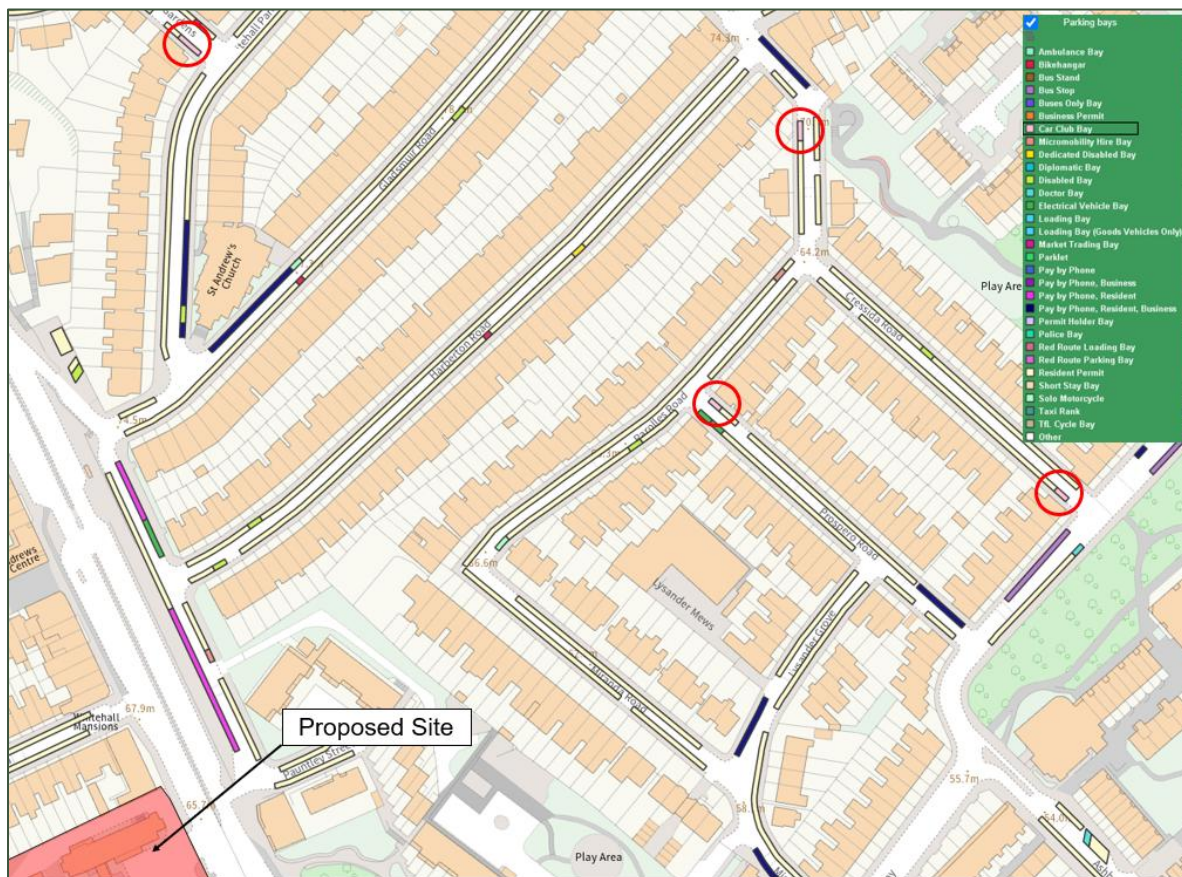
- 2.23 The context surrounding car club operations and bays in proximity to the Site has evolved during the progression of this application, particularly following the withdrawal of Zipcar services at the end of 2025 and beginning of 2026. As a result, there are currently limited existing car club opportunities in the vicinity of the Site and across the LBI more generally. This affects the Council's car club permit scheme, as the reduction in local car club provision has not, to date, been matched by replacement capacity in the surrounding area, limiting the practical availability of car club membership opportunities for future residents.
- 2.24 While financial contributions towards car club operations could be considered, it is first necessary to understand LBI's current position regarding car club bay availability and management. It would also be important to establish the mechanism through which a car club bay could be delivered in proximity to the Site.
- 2.25 Notwithstanding the above, opportunities may exist to utilise existing vacant car club bays located close to the Site and within ready walking distance (500m to the north east and 700m to the south east). While the CPMP identified potential locations for new car club bays, consideration must be given to existing bays that are currently unoccupied.
- 2.26 A review undertaken by SLR indicates that vacant car club bays are currently available within proximity to the Site. This review identified 6 car club spaces within a 750m walking distance of all buildings across the Site. Therefore, while alternative locations for new bays were previously identified by SLR, the availability of existing vacant bays demonstrates that suitable provision is available. This approach would avoid the need to remove resident parking spaces or implement additional Traffic Management Orders (TMOs).
- 2.27 The location of these vacant bays is shown in **Figure 2.2 and 2.3**. These figures show extracts of the Interactive LBI Map – with the parking layer showing. It should be noted that two plans have been prepared to ensure that enough detail can be shown on the interactive map. All these spaces are within at most a 1km walking distance from the Site.



Figure 2.2: Car Club Bay Plan 1



Figure 2.3: Car Club Bay Plan 2



- 2.28 Considering the above, we are aware that LBI may be in discussions with new providers. However, it should be noted that for contributions towards a new vehicle and membership to be considered suitable, it must be understood as to the current situation with LBI regarding car club bays.

Steer Comment 23

A Detailed Car Parking Management Plan should be secured as a pre-occupation condition.

SLR Response 23

- 2.29 Noted and agreed.

Cycle Parking

Steer Comment 24

Proposed cycle parking is based on London Plan (2021) standards.

SLR Response 24

- 2.30 Agreed, although it is noted that the adopted Support for Housebuilders LPG cycle parking standards are also relevant following their adopted in March 2026. They are also consistent with the draft London Plan.

Steer Comment 24

The number of long stay cycle parking spaces meets the minimum requirements, for the majority of buildings with the exception of the Admin/ Holborn building (shortfall of 3 long stay cycle spaces) and Charterhouse building (shortfall of 1 cycle space). It is mentioned that this is due to retrofitting and is marginally below requirements. However, the Block B cycle store is overproviding by three cycle spaces. The Applicant should confirm whether residents within the Admin/ Holborn building could be given the access to the Block B cycle store to offset this shortfall, if the need arises.

SLR Response 24

- 2.31 If required, yes, residents within the Admin/Holborn building would have access to Block B. This would be considered as part of the Travel Plan monitoring.
- 2.32 Notwithstanding, as detailed within the TAA, and above, throughout the cycle parking standards within the Local Plan have been aligned with wherever possible. However, within



the Admin/Holborn building the proposed provision is 3 below the minimum, with the Charterhouse provision a single space below the minimum.

- 2.33 Notwithstanding the London Plan standards, it is necessary to also consider the adopted London Plan Guidance (LPG) 'Support for Housebuilders' and the associated standards for cycle parking.
- 2.34 The LPG sets out time-limited changes to cycle parking requirements and changes to housing design guidance, together with a new time-limited planning route for the delivery of affordable housing. The UK Government and Mayor of London confirmed in March 2026 (prior to final issue) that the LPG is *"aimed at improving the viability of housing development in the near term and accelerating housing delivery"*. The standards within the LPG supersede the standards in the adopted LP. It is noted that these standards also align with those within the Draft London Plan (due for adoption in 2028).
- 2.35 The purpose of the LPG is to provide updated guidance for the implementation of adopted LP policy T5 related to cycle parking standards (currently complied with for the Proposed Development).
- 2.36 It should be noted that the LPG classifies LBI as being in Band 1. The cycle parking standards set out within the adopted LPG for Band 1 locations are set out below:
- 1.0 space per studio or one bedroom dwelling.
 - 1.5 spaces per two bedroom dwelling.
 - 1.9 spaces per three or more bedroom dwelling.
 - 0.7 spaces per purpose built student accommodation bedroom
- 2.37 Although the proposals do not intend to alter cycle parking provisions to align with this LPG, this does illustrate that the proposed provision significantly exceeds the latest adopted cycle parking standards. For clarity, **Table 2.1** compares the provision required by the London Plan, LPG and the proposed provision.



Table 2.1: Long Stay Cycle Parking Comparison (Residential Only)

Use Class	Building	London Plan			LPG		
		Min Required	Proposed	Net	Min Required	Proposed	Net
PBSA (Sui-generis)	Clerkenwell	24	183	+1	23	183	+13
	Student Tower	158			147		
Residential (Class C3)	Admin	30	140	-3	28	140	+21
	Holborn	113			91		
	Charterhouse	21	20	-1	17	20	+3
	Block A	50	50	0	41	50	+9
	Block B	71	74	+3	52	74	+22
	Block C	28	28	0	23	28	+5
Total		495	495	0	422	495	+73

- 2.38 Considering the above, the proposed cycle parking within the Holborn/Admin and Charterhouse buildings can be considered to be acceptable, as the proposed provisions significantly exceed the relevant guidance.
- 2.39 Notwithstanding, as detailed above, as part of the Travel Plan monitoring cycle store usage would be monitored. If capacity issues arise, then solutions could be explored as to how this can be managed. Furthermore, this monitoring also means that the proportions of rack types (accessible, Sheffield and two tier) can be tailored to suit residents' requirements as part of a monitor and manage regime that would be delivered through Travel Plan.

Steer Comment 24

The number of proposed short stay cycle parking spaces does not meet minimum policy requirements, mainly because the numbers of spaces have not been rounded up. The following short stay provision should be provided per building:

- ***Holborn residential – 3 spaces.***
- ***Admin residential – 2 spaces.***
- ***Charterhouse residential – 2 spaces.***
- ***Block A residential – 2 spaces.***
- ***Block B residential – 3 spaces.***
- ***Block C residential – 2 spaces.***
- ***Student Tower – 6 spaces.***
- ***Café – 6 spaces.***



SLR Response 24

- 2.40 The above is noted and appears to represent a different application of the standards in which standards have been applied on a block-by-block basis as opposed to a site wide context. Notwithstanding the above, the above provision is accepted. It is noted that in addition to the above, 2 spaces are provided for Clerkenwell, taking the total to 28 spaces.

Steer Comment 24

Appendix 4 of the Local Plan states that, 20% of the cycle parking spaces provided must be accessible, of which 25% (5% of total provision) must be designated for non-standard cycles and 75% (15% of total provision) must cater for ambulant disabled cyclists. This can be met for all long stay cycle stores except the Student Tower which can only provide 10% accessible spaces. Further justification should be provided for why this is not achievable.

SLR Response 24

- 2.41 Detailed justification for the provision and mix proposed is provided within the TAA at paragraphs 5.56-5.59. This explains how the size of the basement restricts the space available for additional cycle parking, along with providing justification for this compromise for this building.
- 2.42 In any case, as detailed within **Table 2.1**, when the new LPG standards are considered, the current store now represents an over provision of 13 cycle parking spaces for residents. Accordingly, minor adjustments to the mix of cycle parking spaces to increase the number of accessible spaces can be explored, whilst still ensuring the provision aligns with the LPG standards. It is suggested that the final detailed cycle parking layout would be required by a suitably worded condition.
- 2.43 Furthermore, the Travel Plan monitoring also means that the proportions of rack types (accessible, Sheffield and two tier) can be tailored to suit residents' requirements as part of a monitor and manage regime.

Steer Comment 24

Long stay cycle store drawings have been provided in Appendix H of the HSTAA, with dimensions also provided. We have the following comments on these:

– Block A – there appear to be two Sheffield cycle stands with a minimum distance of 525mm between centres, which is substandard compared to the minimum LCDS requirement of 1m between stands.

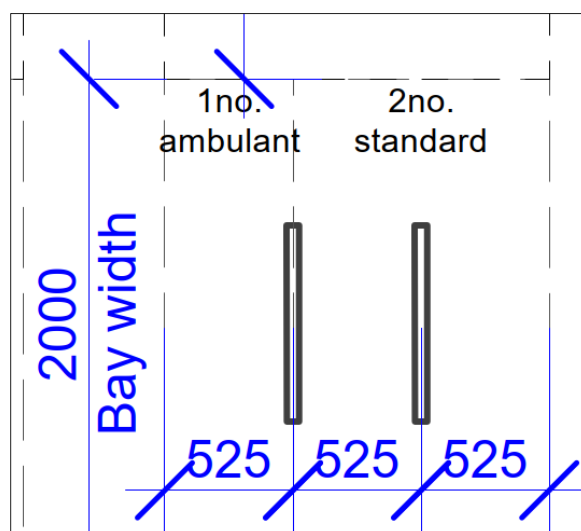


– Dimensions should be provided for the Holborn and Admin building and Charterhouse building long stay cycle store layouts to ensure the suitability of the proposed cycle store layouts to be reviewed.

SLR Response 24

- 2.44 Regarding Block A, as noted within the relevant Block A store drawing (**Figure 2.4**), the left stand is to be utilised on just the left-hand side, this is a single ambulant stand. To the right, the stand can accommodate cycles on both sides. The width between the two stands at 525mm is sufficient as no bicycle will be parked between the stands. The 525mm space therefore represents the space sufficient to accommodate a single bicycle.

Figure 2.4: Block A Cycle Parking



- 2.45 Regarding the Holborn and Admin, and Charterhouse buildings the drawings provided present the areas associated with each area within the store with stand areas and aisle widths designed to standard.
- 2.46 Notwithstanding the above, it is suggested that the final detailed cycle parking layouts would be required by a suitably worded condition. As such, these minor details, especially noting the LPG standards and associated implications, can be addressed prior to the construction of the stores.
- 2.47 Furthermore, the Travel Plan monitoring also means that the proportions of rack types (accessible, Sheffield and two tier) can be tailored to suit residents' requirements as part of a monitor and manage regime.

Steer Comment 24

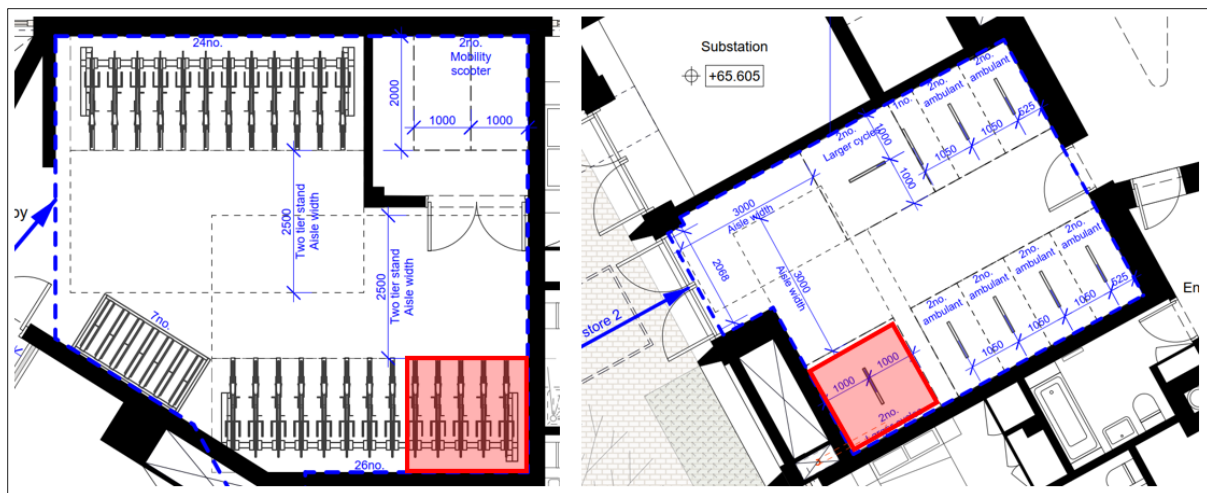
Cycle repair stands should be provided in each cycle store, or within the vicinity of the cycle stores.



SLR Response 24

- 2.48 Cycle repair stands are not a distinct policy requirement. In any case the provision of end of trip facilities that include a pump and retractable cycle repair stand could be provided within each store.
- 2.49 For a more permanent fixture to be provided the provision of spaces within each store would need to reduce to make space for the stand. Such an amendment can be considered, especially noting the LPG standards now relevant to the Proposed Development. As an indicative review, **Figure 2.5** below illustrates the likely impact of a repair stand on provision, this will vary by building. This assumes a 2mx2m area for the stand and space to work around the stand.

Figure 2.5: Repair Stand Considerations



- 2.50 As illustrated above, the introduction of a repair stand in these stores would result in the loss of 10 two-tier cycle parking spaces, or 2 larger Sheffield stand spaces (equivalent to 4 standard Sheffield stand spaces). Comparatively, a foldable stand would have minimal impact upon the provision provided.
- 2.51 Notwithstanding the above, it is suggested that the final detailed cycle parking layouts would be required by a suitably worded condition. As such, these minor details, especially noting the LPG standards and associated implications, can be addressed prior to the construction of the stores.

Steer Comment 24

It is stated that the cycle spaces in the Holborn cycle store will be accessed by four lifts and two stairs, but that the lifts will not have LCDS compliant dimensions (2.3m x 1.2m with a 1m door), due to the retrofitting of the building. Clarification should be provided on the actual dimensions of the proposed lifts and whether there is space on the stairs to provide wheeling gutters.

SLR Response 24

- 2.52 Based upon the 'Proposed Holborn and Admin GA Floor Plan – Level B1 P1' drawing the lifts are 1.4m x 1.6m with a 0.9m door width. The stairs would not allow for wheeling gutters. Notwithstanding the above, it is suggested that the final lift details would be included within the detailed cycle parking layouts that would be required by a suitably worded condition.

Steer Comment 24

A consolidated ground floor landscape plan is required to show proposed short stay cycle space locations and their interaction with the public realm. These should be colour coded, to demonstrate the assignment by land use/ Block.

SLR Response 24

- 2.53 A plan will be prepared detailing the exact short stay cycle parking locations. This should be part of the suitably worded condition relating to cycle parking (both long and short stay).

Steer Comment 24

LBI Local Plan Policy H7 sets out the “minimum standard of secure storage and charging facilities equivalent to 25% of dwellings”. Blocks A and B are the only residential buildings with wheelchair housing units (4 and 6 respectively). Policy-compliant mobility scooter storage is provided in Blocks A and B in the following locations:

- Block A Ground Floor – one space in a separate compartment***
- Block B – Two spaces provided in a separate compartment.***

SLR Response 24

- 2.54 Noted.

Steer Comment 24

As the Holborn building is retrofitted no mobility scooter spaces are proposed for that building but it is proposed to monitor the requirement for these in the Travel Plan.

SLR Response 24

- 2.55 Noted.

Steer Comment 24

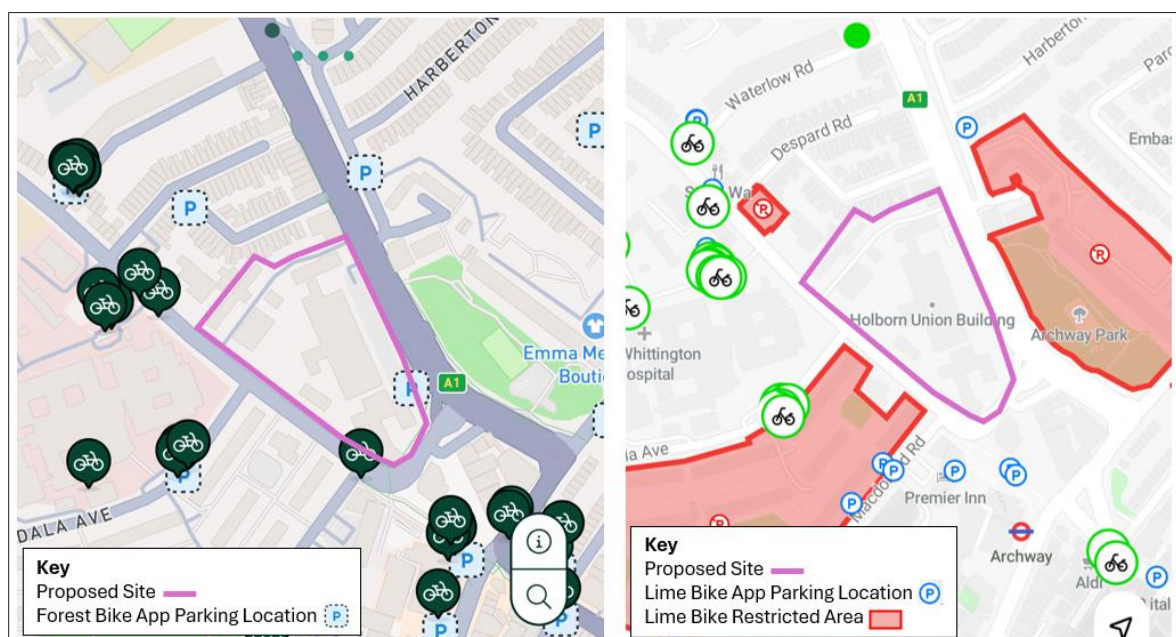


The scheme should identify locations for dockless cycle parking (Lime bikes), to ensure hire bikes

SLR Response 24

- 2.56 There is no policy requirement for dockless cycle parking locations to be accommodated with the Site.
- 2.57 Notwithstanding, the benefits of dockless cycles are acknowledged. However, a review of existing dockless cycle providers illustrates that there are a significant number of existing parking opportunities that have already been identified in proximity to the Site, as shown in **Figure 2.6** below. These parking areas could be used by residents.

Figure 2.6: Dockless Cycle Parking Locations



- 2.58 As illustrated above, considering only two dockless cycle providers, there is already ample designated parking provision in the vicinity of the Site, including immediately adjacent to the Site boundary on Archway Road. These existing facilities are sufficient to serve future residents of the development, and therefore dedicated dockless cycle parking provision within the Site is not considered necessary.
- 2.59 Furthermore, should irregular parking of dockless cycles within the Site be a concern, management measures could be implemented to restrict parking within the Site's public realm. As demonstrated through the Lime operator application, similar restrictions are already in place in proximity to the Site to prevent parking within certain areas.
- 2.60 It should also be noted that, given the availability of existing parking provision surrounding the Site, the absence of dedicated dockless cycle parking within the development would not discourage the use of dockless cycle services. Existing designated parking locations would



remain conveniently accessible, with all proposed buildings located within approximately 200m of a designated parking area. Accordingly, additional provision within the Site is not considered necessary to support sustainable travel choices or mitigate the transport impacts of the proposed development.

- 2.61 It should also be noted that the absence of dedicated dockless cycle parking within the Site would not discourage the use of dockless cycle services. Existing designated parking locations would remain readily accessible to future residents, and accordingly additional on-site provision is not considered necessary to support sustainable travel choices or mitigate the transport impacts of the proposed development.
- 2.62 With consideration of the above, it is noted that all roads and public realm within the Site are intended to remain privately managed and are not proposed for adoption by LBI. SLR has demonstrated that existing dedicated dockless cycle parking is provided in close proximity to the Site, and therefore additional on-site provision is not required.
- 2.63 Furthermore, not providing dockless cycle parking areas within the Site reinforces the fact that the east-west route is not a contraflow route and prevents routing by visitors through the pedestrianised public realm areas.

Servicing/Circulation

Steer Comment 24

It is welcomed that passing places with widths of 5.22m and 6.22m have now been provided on the eastern internal servicing route within the masterplan. However, further review should be undertaken to demonstrate that a supermarket home delivery van (box van) can safely pass an oncoming refuse vehicle on the eastern two-way route. This could be achieved by amending the landscaping extent, if necessary.

SLR Response 24

- 2.64 This swept path analysis has been completed and is provided at **Appendix C**. The swept path analysis confirms that no widening is needed.

Steer Comment 24

Chapter 5 of the HSTAA still proposes westbound only cycle movement through the site on the northern east-west route through the masterplan between the site access points. A west-east cycling option should also be explored as this will occur, with designs provided to identify how this could be integrated at the site access points with Highgate Hill and Archway Road. This would help ensure that the scheme complies with Local Plan Policy T2 Part E and London Plan Policy T5 – see the markup at Appendix B, which suggests provision of intermittent passing places



SLR Response 24

- 2.65 The provision of an east-west cycle connection through the Site has been considered previously and is assessed in detail at Paragraphs 5.24 to 5.32 of the TAA, supported by associated routing figures. That assessment demonstrated that a dedicated contraflow cycle route through the Site would deliver limited transport benefits and is therefore not considered necessary.
- 2.66 To reiterate these points, a contraflow cycle route through the Site would provide limited benefit to future residents of the proposed development. Residents travelling to and from destinations to the south would utilise the existing cycle infrastructure on Highgate Hill and Archway Road, whilst those travelling north would either access Highgate Hill directly or connect to the Archway Road cycle route on foot, via the Site access (see Figure 5.3 of the TAA). As such, the proposed development already benefits from access to the existing cycle network without the need for a dedicated contraflow route through the Site.
- 2.67 Existing residents and cyclists travelling through the area are also served by a number of established routes connecting Highgate Hill and Archway Road. These include routes via Waterlow Road and Despard Road/Lidyard Road to the north, together with the route via Tollhouse Way to the south of the Site. These routes are comparable in length and convenience to a contraflow route through the Site, whilst also benefiting from existing cycle infrastructure, most notably along the route via Tollhouse Way.
- 2.68 Accordingly, it is unclear whether any user group would derive a material benefit from the provision of a contraflow cycle route through the Site. Whilst SLR's review identified that cyclists travelling to and from Magdala Avenue may be the most likely users of such a route, these movements are already accommodated for by a number of suitable and convenient existing routes. As such, the provision of a contraflow route through the Site would offer only a limited improvement in connectivity and is not considered necessary.
- 2.69 The journey time comparison between these routes is detailed below in **Table 2.2**. These timings are based upon Google maps route planner, for cyclists as shown at **Appendix D**.

Table 2.2: Cycle Route Comparisons

Route	Cycle Distance	Cycle Journey Time
1 – Waterlow Road	450m	4 minutes
2 - Despard Road/Lidyard Road	500m	4 minutes
3 – Tollhouse Way	550m	4 minutes
4 – Contraflow Route	410m	4 minutes

- 2.70 The distances and cycle journey times presented within the table clearly demonstrate that, whilst a contraflow route through the Site would be marginally shorter than the existing routes, the difference would be negligible in practice and would result in little meaningful journey time saving.



- 2.71 Whilst the routes are broadly comparable in terms of distance and journey time, consideration should also be given to route quality:
- A contraflow route through the Site would require cyclists travelling towards Archway Road from Magdala Avenue to undertake a right-turn manoeuvre across oncoming traffic on Highgate Hill, potentially including queued traffic. This would not represent the safest or most accessible option for cyclists.
 - Comparatively, the route south along Tollhouse Way requires no such manoeuvre, as cyclists benefit from the Magdala Avenue/Highgate Hill signalised junction and subsequent bus/cycle lane provisions. This means no crossing of oncoming traffic.
 - Whilst the Waterlow Road and Despard Road/Lidyard Road routes also require cyclists to cross Highgate Hill, traffic in these locations is less likely to be queued. In addition, Despard Road benefits from highway hatching that provides waiting space for right-turning cyclists, whilst the pedestrian refuge island to the north offers a degree of additional protection. These factors, most notably the pedestrian island make this movement preferable to the right turn that would be required into a contraflow cycle lane through the Site.
- 2.72 Accordingly, a contraflow route through the Site would provide only a marginal benefit in terms of distance and journey time and would be relevant to a very limited number of cycle movements, principally those between Magdala Avenue and Archway Road. Furthermore, the requirement to turn across potentially queued traffic on Highgate Hill means that the route would not necessarily represent the safest or most attractive option when compared with the existing alternatives.
- 2.73 It should also be noted that a contraflow cycle route would principally benefit existing residents and visitors travelling through the area, whilst providing limited benefit to future residents of the proposed development. As such, the provision would primarily support a wider LBI connectivity objective rather than mitigate a site-specific impact of the development.
- 2.74 Considering the above, encouraging public use through private land is not supported and would require LBI to adopt the route and therefore manage ongoing maintenance. This would appear unnecessary given the suitability of the southern route and the two routes to the north, all of which utilise adopted roads.
- 2.75 Finally, but also integral to this discussion point, given the alignment and location of the heritage buildings, it would not be possible to widen the east-west carriageway and hence, there is not space available to accommodate a contraflow route.
- 2.76 In summary, SLR considers that there is no demonstrated need for a contraflow cycle route through the Site. Any transport benefits would be limited, particularly given the availability of existing routes that already provide effective connections between Highgate Hill and Archway Road. Furthermore, the physical constraints of the Site, including the retained heritage assets, mean that such a facility cannot be accommodated safely within the space available.



Steer Comment 25

The DAS also shows aspirations for a direct connection between the development and the cycle crossing on Highgate Hill towards Navigator Square – see the markup at Appendix B. This is supported by LBI but the Applicant needs to provide a concept drawing showing how this would work in practice.

SLR Response 25

- 2.77 The routing shown within the DAS provides an illustrative representation of general movement through the Site by cyclists. The more detailed and relevant assessment of cycle movements is provided within the TAA, with the associated cycle routing plans reproduced below.
- 2.78 Movements to and from Navigator Square are not envisaged to occur through the area of public realm located to the south of the Site, adjacent to the student tower. This space has been designed as a pedestrian-focused environment and the proposals seek to preserve its pedestrian character by discouraging cycle movements through it. Furthermore, direct cycle access between the residential blocks and the Navigator Square crossing is not possible due to changes in level and the presence of steps.
- 2.79 Instead, it is envisaged that:
- Residents of the student tower, Clerkenwell and Block C would be expected to walk through the public realm to access the Navigator Square crossing to the south, or join Highgate Hill to the west when departing the Site. On return, it is anticipated that cyclists would dismount at the crossing point and walk the remaining distance to their building, typically between 50m and 100m.
 - Residents of the remaining residential blocks would be expected to cycle directly to Highgate Hill when departing the Site. From there, they would access the Navigator Square crossing via Highgate Hill, benefitting from the existing cycle infrastructure, including advance stop lines, a shared bus/cycle/taxi lane and dedicated cycle facilities. When returning to the Site, residents would utilise the segregated cycle lane on Archway Road before entering the Site and travelling to their respective buildings.
- 2.80 These routing options are suitable and logical for future residents. Both Highgate Hill and Archway Road benefit from established cycle infrastructure and provide effective connections to the surrounding cycle network, meaning additional cycle routing through the Site is not required. Furthermore, directing cycle movements in this manner helps maintain the pedestrian priority of the public realm, improving safety and minimising the potential for conflict between pedestrians and cyclists. The routing context is illustrated below.



Figure 2.7: Cycle Routing Plan to Navigator Square



Figure 2.8: Cycle Routing Plan from Navigator Square



Steer Comment 25

Further details are required on how access will be controlled, with appropriate signing/ enforcement at both the eastern and western end of the vehicle access points and within the site itself to prevent unauthorised vehicles accessing the masterplan or using the east-west route as a rat-run. Clear signage will be required within the site, to identify the permitted turning movements and restrictions on vehicle access. Full details of the proposed enforcement and signage strategy should be conditioned.

SLR Response 25

- 2.81 Appropriate signage will be provided throughout the Site and the control of the access has been considered. This is detailed within the TAA, as replicated below. It is considered that a suitably worded condition would require plans showing proposed signage to be agreed prior to occupation.

'5.16 With regard to vehicle control, given the low number of vehicle movements forecast (as set out within Chapter 7), there is no reason to suggest that dedicated controls would be needed at the Site to manage vehicle movements. In any case, signage would be provided within the Site to indicate to reinforce the vehicles circulation at the Site, and as part of the Delivery and Servicing Management Plan (DSMP), issues associated with the accesses



could be monitored. If controls are deemed necessary in the future this would be identified through the DSMP and subsequently addressed.'

Steer Comment 26

Despite additional comments being provided in the HSTAA and Appendix E being included showing the proposed access points overlaid over the highway boundary, it is still not clear how the proposed access points will be altered compared to the existing layouts. Revisions appear to be proposed to both the Archway Road (reduction in width of crossover and revised kerblines) and Highgate Hill access points. Drawings are required that show the proposed design revisions of the access points, overlaid over the existing access layouts, taking into account LBI's desire for the access points to accomodate two-way cyclists.

SLR Response 26

- 2.82 These drawings are provided at **Appendix B**. As noted above, the provision of contraflow cycle lane facilities are not provided.

Steer Comment 27

Swept path analysis has been provided for both access points, however, a swept path for the right turn egress movement onto Highgate Hill has not been provided. Visibility splays should be shown for the egress onto Highgate Hill.

SLR Response 27

- 2.83 The relevant swept path analysis has been undertaken and is provided at **Appendix C**. The visibility splays are provided within drawings at **Appendix B**.

Steer Comment 28

A Road Safety Audit covering the access points should be secured by condition.

SLR Response 28

- 2.84 Noted and agreed.

Delivery and Servicing Management Plan

Steer Comment 29

An Outline Delivery and Servicing Management Plan (DSMP) has now been submitted. We have the following comments:



- 2.85 ***The table of contents needs correcting with regard to Appendix references as it references Appendix A as being the Site Location Plan. The Outline DSMP has an Appendix A swept path analysis sub-heading at the end but no swept paths are included in the Appendix.***

SLR Response 29

- 2.86 The final DSMP was provided at Appendix N of the TAA. No specific appendices are provided. Instead, reference is made to the TAA appendix in which the relevant drawings are provided.

Steer Comment 30

- 2.87 ***It is welcomed that the originally proposed loading bay on Highgate Hill has now been removed as stated in the HSTAA. However, Section 4.4 of Design and Access Statement still shows a loading bay on Highgate Hill. A condition is proposed to stipulate that all servicing must take place within the site to ensure compliance with Local Plan Policy T5 and London Plan Policy T7 Part G.***

SLR Response 30

- 2.88 Noted and agreed. Any reference will be removed.

Steer Comment 31

Figure 4-2 of the DSMP identifies proposed locations of the cycle/ motorcycle delivery bays. Dimensions of these bays should be provided, as provision should be made for wider/ longer cargo bikes which are larger than a standard cycle.

SLR Response 31

- 2.89 The design and exact location of these bays is to be conditioned, as stated in the TAA. However, it is envisaged that these bays would align with motorcycle bay dimensions and would therefore be 2.0x0.8m with a Sheffield stand to one side where a single bay is being provided. If multiple spaces are being provided in one location then these would again be expected to be 2.0x0.8m with a Sheffield stand in the middle. This accommodates motorcycles and cargo cycles.

Steer Comment 32

- 2.90 ***A refined servicing trip generation assessment approach has been agreed with TfL. TfL should provide their comments on whether this has met all the requirements, that they discussed with the Applicant. Table 4.1 of the DSMP sets out the trip rates, however clarification should be provided on the unit value these rates apply to (per unit/ 100sqm?), as this is missing from the table.***



SLR Response 32

- 2.91 For the student accommodation and residential dwellings, these are per unit. For the commercial space these are per 100sqm.

Steer Comment 33

- 2.92 ***Drawings have now been provided identifying refuse vehicle stopping locations and bin drag distances from the vehicles to each refuse store. The maximum drag distance for bins is 10m. Figure 4.3 of the DSMP identifies that the bin wheeling distances between Block C, the Clerkenwell building and the Student Tower will be significantly in excess of 10m, however it is stated that where this occurs site management will transfer the bins to/ from the collection point. This needs to be committed to by the Applicant in the Detailed DSMP.***

SLR Response 33

- 2.93 Noted and agreed.

Steer Comment 34

Clarification is required on who will be collecting student waste.

SLR Response 34

- 2.94 Student waste will be collected by LBI refuse team. It is noted that this will be a separate collection to the residential collection for the residential dwellings.

Steer Comment 35

The potential for delivery and servicing by non-motorised sustainable modes – such as and clean vehicles should be investigated and promoted in the DSP.

SLR Response 35

- 2.95 This can be detailed within the Detailed DSP to be conditioned.

Steer Comment 36

The DSMP includes no mention of targets. Targets should be added to the document and could include:

- ***Minimising servicing and delivery trips to be undertaken during the AM and PM network peak hours (08:00 – 09:00 and 17:00 – 18:00).***



- ***Minimising servicing and deliveries undertaken during the night-time period (23:00 – 06:00) to prevent disturbance to nearby residential properties.***
- ***Specifying a maximum number of daily delivery and servicing vehicle trips to encourage the consolidation of trips to the Site.***
- ***All, or a specific proportion, of servicing and delivery companies used, to be a member of FORS.***
- ***Specific percentage of the Proposed Development servicing and delivery vehicles to be ‘green’ vehicles.***
- ***Number/percentage of servicing trips to be made by non-motorised means (cycle, etc.)***

SLR Response 36

- 2.96 Targets can be presented within the Detailed DSP. These can include a number of those listed above. It is however noted that this is predominantly a residential led development and hence some of the measures listed above may not be applicable to the proposals. For example, having target for deliveries to be undertaken outside of network peak hours is difficult for a residential site to manage. This would only be relevant to the very few delivery’s linked to the commercial floorspace.
- 2.97 Notwithstanding, the detailed DSP could outline how residents will be educated to make more informed decisions about how their goods are delivered, for example:
- Explaining what FORS is and how to find out who is a member
 - Promoting greener delivery companies and options
 - Promoting consolidated deliveries to delivery lockers (Amazon, Evri and Inpost all have lockers in Archway).

- 2.98 The appropriate targets, and exact wording would be agreed within the Detailed DSP to be conditioned.

Steer Comment 37

The Targets should align with the objectives and measures set out previously and should be SMART (Specific, Measurable, Achievable, Relevant, Time-bound).

SLR Response 37

- 2.99 The appropriate targets, and exact wording would be agreed within the Detailed DSP to be conditioned. However, this seems appropriate and logical.



Steer Comment 38

2.100 ***The DSMP is very light on measures and no action plan is included. An action plan should be provided with distinct measures including:***

- ***Management of the DSMP – This should outline who is responsible for co-ordinating the DSP, details of proposed servicing surveys, initiatives to raise awareness.***
- ***Servicing Vehicle Access – measures to promote routes.***
- ***Reducing Servicing/ Delivery trips – consideration of smart couriers, use of locally sourced couriers/ suppliers.***
- ***Servicing/ Delivery operations – measures including promoting details of the site's servicing, delivery and waste management operations, encouraging deliveries outside of peak hours, FORS membership, vehicle management booking system, use of low emission vehicles.***

SLR Response 38

2.101 An action plan can be provided within the Detailed DSP. As outlined above, these examples are not all considered to be the most relevant and appropriate for the proposed development, for example encouraging deliveries outside of peak hours (although it is acknowledged that in some cases this can be managed). As such, the specific wording of the action plan will be agreed within the Detailed DSP to be conditioned.

Steer Comment 39

2.102 ***Although the DSMP mentions the building management team will monitor the DSMP there is no further discussion of what this will entail and how the DSMP will be managed. Further details need to be provided of who will have responsibility for managing the DSP, and a clear review and monitoring strategy including dates of baseline surveys (within 6 months of occupations or 75% occupancy, whichever occurs sooner, and future surveys (3rd and 5th year post occupation) and update periods for the DSMP. The DSMP should be reviewed and updated following each survey in dialogue with LBI.***

SLR Response 39

2.103 These details are not yet available and may vary between the residential and student accommodation aspects of the development. As a consequence, it has not been possible to provide more detail at this stage. Instead, this would be provided and agreed within the Detailed DSP.

2.104 The monitoring strategy will also be developed within the Detailed DSP to be conditioned and can include details of baseline surveys (for example after 6 months or 75% occupancy), and future surveys in years 3 and 5 post occupation.



Waste Management Plan

Steer Comment 40

An Operational Waste Note (OWN) has been provided which sets out the proposed waste volumes, and bin numbers by land use and building. This information should be included in the Outline Site Waste Management Plan (OSWP). At this stage we have the following comments, subject to further review by the LBI Waste Team:

The residential waste volumes and bin numbers do not appear to have been calculated based on the LBI Recycling and Refuse Storage Requirements: Planning Guidelines (2025). Clarification should be provided on why these have not been followed.

SLR Response 40

- 2.105 The guidance quoted above is new and was introduced following the submission of the application in September 2024. As such, as detailed within the *LBI Recycling and Refuse Storage Requirements* document the waste forecast and associated facilities were based upon the *Code for Sustainable Homes* which in turn are based on *BS5906/2005* (The Waste Management in Buildings code of practice).
- 2.106 Hence, given the stage of the application and development of the scheme, it was not appropriate to change the calculations associated with waste at the Site.

Steer Comment 41

Details need to be provided on the assumptions/ standards used to calculate waste volumes/ bin requirements for the student and commercial uses.

SLR Response 41

- 2.107 There is no specific guidance on waste forecasting rates for student accommodation, therefore this element has been based on a typical waste generation rate of 100 litres per bedspace per week. This rate is based on a mix of surveys and information from operations of student accommodation blocks throughout the UK. This is a standard approach for student accommodation and is a blended rate between residential and hotel uses and including associated residential amenity areas.
- 2.108 In terms of the commercial this is based on *BS5906/2005* guidance for a fast-food outlet, which is considered to be the most appropriate standard to apply to the café use.



Steer Comment 42

It is noted that twice weekly residential collections are proposed. This is becoming more common in the Borough but the applicant should be aware that they would be required to pay the additional costs, as the Council Tax only covers weekly collections.

SLR Response 42

2.109 Noted.

Steer Comment 43

It is noted that the refuse store in Block C will be shared between the residential accommodation and the café unit and that in the Student Accommodation building the refuse associated with the student waste and commercial unit will also be accommodated in a shared store. Clarification is required as to how the bins will be kept separate, clearly signed to the different users, and how access will be permitted between the two different users.

SLR Response 43

2.110 The shared refuse stores will be appropriately divided to ensure that waste generated by the different uses is kept separate. Dedicated and clearly labelled bin storage areas will be provided within each shared refuse store, with signage identifying the bins and storage areas allocated to each respective user. Access to the refuse stores will be controlled through the building management arrangements, with access provided (likely through a key, pin or access fob) to the relevant users and waste collection people.

Steer Comment 44

Drawings should be provided to demonstrate that the communal residential refuse stores are within a 30m distance of each dwelling's front door.

SLR Response 44

2.111 For flats, residents would move waste from their apartment to a communal store using the building's internal circulation, including lifts. This would minimise walking distances and improve convenience.



Student Access Management

Steer Comment 45

An Outline Student Management Plan has been included as an Appendix to the HSTAA. Our comments are as follows:

This includes a Move In/ Move Out strategy and stopping locations are referenced but it would be helpful to understand on a drawing where the stopping locations – use of parking bays/ loading bays will be and the zone in which vehicles can stop on the internal highway and how much capacity this will have for parked vehicles. Further details are required on how internal highway circulation would work. For example would all students enter and exit via the eastern internal highway route only, or would they use the whole internal vehicle loop in one direction?

SLR Response 45

- 2.112 Considering the numbers below, the student parking bay and loading bay would accommodate the majority of the demand. However, additional spaces could be provided as shown below. It should be noted that this arrangement would not prevent fire access, which is shown in **Figure 2.9**.

Figure 2.9: Student Move in/Move out Parking



2.113 In terms of circulation, this could be one way to simplify movement through the Site, in an anticlockwise direction. The exact circulation would be detailed within the Student Management Plan to be conditioned.

Steer Comment 46

It would help if an indication could be provided of the number of students that would arrive/ depart per day by vehicle during each move/ in and move/out day, on a Sat/ Sunday over 3-4 weekends.

SLR Response 46

2.114 As an indication:

- There are a total of 242 student units. It can be assumed that drop off/pick up will occur over 3 weekends, which equates to 6 days (Saturday and Sunday). This equated to 40 students per day.
- It is assumed that this will occur between 08:00-18:00, with 30-minute time slots for each student. This equates to 20 time slots per day and therefore 2 students per time slot.
- It is assumed that many students will use public transport, but to be robust if students were only dropped off by car, this would equate to 2 cars every 30 minutes.
- As such, the southern student parking bay and loading bay would provide sufficient capacity for the 'average scenario'. In any case, if additional capacity was needed for a short period, the internal carriageway to the west of the southern loading bay could be used, as detailed above.

Steer Comment 47

It is welcomed that the Student Management Plan includes an action plan and monitoring plan and that arrival slots will be allocated.

SLR Response 47

2.115 Noted.

Steer Comment 48

A Detailed Student Management Plan should be secured as a pre-occupation condition, which could capture the above details.

SLR Response 48

2.116 This is agreed.



Trip Generation

Steer Comment 49

Earlier trip generation assessments have been updated to take account of the deficiencies noted in our March 2025 response. We have the following further comments at this stage:

- ***Peak hour car trips associated with the former use (Table 7.3 in HSTAA) is still overestimated, as it is unlikely that 100 car parking spaces would fill or empty within a single hour.***
- ***Some of the sites used for the residential trip generation would appear to include surveys undertaken during lockdown (Table 7.4 of the HSTAA), which may result in an underestimation of residential trips generated by the development***
- ***Nevertheless, it is clear that the proposed uses will generate much less daily activity than the extant uses, so there would be beneficial impacts upon the surrounding highway and public transport networks.***
- ***Table 7.12 of the HSTAA correctly notes that the development will generate significantly more trips by sustainable modes than by private car. In this regard, we consider that further changes are needed to the on-site layout and access points to better cater for cyclists (see comments above).***

SLR Response 49

2.117 The above comments are noted, and no action is needed.

Active Travel Zone Assessment

Steer Comment 50

The applicant has updated the earlier daytime Active Travel Zone Assessment (ATZ) to include a nighttime ATZ. The findings are accepted and contributions should be sought to address the deficiencies identified in Chapters 6 of the original TA and the Healthy Streets TA Addendum.

SLR Response 50

2.118 This is noted and it is agreed that contributions should be provided to address appropriate improvements.

2.119 However, the Healthy Streets Assessment is an evidence-gathering and appraisal tool. Its purpose is to identify issues and potential improvement measures. TfL guidance outlines



how this assessment *'will help you consider what changes could be made to improve the experience'* for active travel users.

- 2.120 Accordingly, the identification of a potential intervention within a Healthy Streets Assessment should not be interpreted as a commitment to deliver that intervention. Furthermore, in some cases the scope of works linked to an improvement, which informs the contribution requires agreement. Hence, the assessment is in place to identify improvements, following this the improvements that should be contributed towards in association with the development can be agreed.

Construction

Steer Comment 51

An Outline Construction Logistics Plan has been submitted. We have the following comments:

The 'Consideration and Challenges' section is very light and should be expanded to draw out the key considerations and challenges from the local transport network section. Minimising impacts on community and educational uses, cyclists using the cycle lanes, bus users and the bus stops/ bus lanes adjacent to the site, and pedestrian users/ facilities need to be mentioned.

SLR Response 51

- 2.121 This is noted, additional text is provided below:
- 2.122 Key considerations within the local highway network include:
- The presence of bus stops along both Highgate Hill and Archway Road. These bus stops are located along the site boundary and hence may be influenced by construction activity. However, it is noted that given the location of the accesses at the site, it is likely that in general bus stops and services will be unimpacted by the work associated with the development proposals. In any case this is a key consideration.
 - The presence of pedestrian footways along Highgate Hill, Archway Road and Tollhouse Way (and cycle lanes along Archway Road and Tollhouse Way) also need to be considered. Generally, given the areas of construction and demolition these facilities should be unimpacted by the development. However, at the accesses management should be in place.
 - The Whittington Hospital access is located to the west of the Site along Highgate Hill. Movements linked to this use, and in particular emergency vehicles must be considered. Throughout construction it must be ensured that roads are not blocked ensuring emergency vehicles are not impeded by the development.
 - Primary schools are identified in proximity to the Site, however these are not adjacent to the development. In any case, when considering the timing of vehicle movements,



especially along Highgate Hill, school drop off and pick up hours should be considered and avoided where possible.

Steer Comment 52

The construction programme is very vague simply saying work will commence at the end of 2027 with completion in 2030. Even at this stage, the anticipated start and end months should be specified, with a high-level programme provided which sets out the periods for the set-up and demolition, basement excavation and piling, sub-structure, superstructure, cladding, and fit-out testing and commissioning phases.

SLR Response 52

2.123 There is no principal contractor appointed at this time and therefore a detailed construction programme cannot yet be provided. However, indicatively, based on a three-year construction period commencing in December 2027 and completing in December 2030, the key construction phases may comprise:

- **Site set-up and demolition:** approximately 4 months (December 2027 to March 2028);
- **Excavation and piling:** approximately 8 months (March 2028 to October 2028);
- **Substructure works:** approximately 5 months (September 2028 to January 2029);
- **Superstructure works:** approximately 14 months (January 2029 to February 2030);
- **Cladding and external envelope works:** approximately 10 months (July 2029 to April 2030); and
- **Internal fit-out, testing and commissioning:** approximately 9 months (April 2030 to December 2030).

2.124 This phasing is indicative only but provides an indication of the phases and timeline for the construction of the development.

Steer Comment 53

Clarification is also required on 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.

SLR Response 53

2.125 It is envisaged, given the nature of the development that phased development would take place. The timing and order of phases is not yet known and would be established through discussions with the contractor. Example phases could be:

- Student Tower



- Block A, B and C
- Heritage Buildings (Admin, Holborn, Charterhouse and Clerkenwell)

Steer Comment 54

Further consideration should be given to construction vehicle routing with a drawing provided to show the wider vehicle routing extent particularly to the north. There is concern over construction vehicles using Hargrave Road and St John's Road, given the 7.5T weight restrictions on these roads, and the residential nature of these roads, particularly Hargrave Road. The preference would be for construction vehicles to be limited to the A1 Archway Road/ Holloway Road and Highgate Hill south of the site access.

SLR Response 54

- 2.126 Considering the above, and routing to and from the Site it is considered that it would be appropriate for construction vehicles to be limited to the A1 Archway Road/ Holloway Road and Highgate Hill south of the site access. A routing plan is provided at **Appendix E**.

Steer Comment 55

Swept path analysis appears to be missing from Appendix A of the document.

SLR Response 55

- 2.127 The CLP document is provided at Appendix O. This includes relevant drawings. For completeness these are provided at **Appendix F** of this Note.

Steer Comment 56

The following information is also still required even in the Outline CLP document:

- ***Indicative site layout plans should be provided setting out the key transport information and access strategy (including gates for pedestrians and cyclists), indicative loading/unloading points, crane locations, site welfare facilities, wheel washing locations and hoarding locations.***

It is not possible for this to be prepared at this stage, without a contractor. However, access is envisaged to be taken from the two vehicle accesses all loading, welfare facilities, wheel washing locations will be within the hoarding. The hoarding will follow the site boundary, keeping the footways clear to minimise impact on pedestrian movement.

- ***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.***



There is no Principal Contractor appointed at this time and therefore detailed vehicle forecasts cannot be provided.

However, consideration has been made to the TRICS Research Report 25/1 (2025). This document provides an evidence-based assessment of construction traffic associated with residential developments during phased build-out and occupation. The research analysed construction traffic data from 26 residential SAM surveys undertaken between 2021 and 2023 and found that construction vehicle activity is generally dominated by light goods vehicles associated with ongoing housebuilding and fit-out operations.

It is noted that the survey doesn't consider urban sites but can be used to provide an indicator for construction traffic. Having regard to the scale of the proposed development comprising 178 dwellings and 242 student accommodation units, the findings of the TRICS research indicate that construction traffic levels during the main build-out period could be expected to be in the order of 80 to 120 two-way vehicle movements per day (based on applying the construction trip rate per dwelling to the total number of dwellings/student accommodation units proposed).

Exact impacts on local highways needs to be identified including on existing cycle infrastructure and bus stops.

It is not possible for exact impacts to be determined within an Outline CLP, and such clarity is not a requirement of an Outline document. In any case, a considered review of the site access and egress locations, and building areas suggests that impacts would be limited:

- Regarding the cycle lane there appears to be no reason to close this for an extended period during construction. Instead, management of the cycle lane where necessary should be undertaken where larger vehicles are accessing the site.
- Regarding bus stops the existing stops are located in close proximity to the site. However, the location of the accesses does not suggest an extended closure of any stops. However, subject to the nature of a delivery this could be required on an ad hoc basis.

These considerations can be clarified further within the Detailed CLP.

- ***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.***

Regarding the first point raised the mitigation listed within the Outline DSP already relates to 'impacts by all modes on surrounding roads, including cycle routes', specifically:

- Adherence to designated routes to keep vehicles on main strategic roads;
- Delivery scheduling to prevent queueing/waiting within the highway network;
- Booking system to manage the timing of deliveries outside the peak hours;
- Construction worker travel advice to promote sustainable travel;
- Consolidation centres to minimise the number of delivery movements and therefore impact on the road network; and,



- Dedicated pedestrian and cycle safety measures as detailed to minimise the impact of development on active travel users

Regarding phased development, the timing and order of phases, which will be established when a contractor is appointed, will minimise the need for construction vehicles to pass through occupied areas. Once this detail has been established, the appropriate detailed on-site measures can be determined. Indicatively, measures could include:

- Appropriate on-site hoarding
 - Clear vehicle signage for construction and residents
 - Temporary on-site parking/delivery bay
 - Presence of banksmen in appropriate locations
 - Ongoing monitoring of construction operations through the Detailed CLP.
- ***There should be restrictions on traffic movements on the surrounding highway network during the AM and PM peak periods.***

It is detailed that a booking system will be in place and that this will be managed to allocate deliveries outside of the peak periods. Hence, this consideration is detailed within the Outline CLP document. The exact detail and wording will be agreed within the Detailed CLP.

- ***A Detailed CLP should be secured as a pre-commencement condition.***

This is noted and agreed.

SLR Response 56

2.128 The SLR response to these bullet points is provided above with green highlighting.

Travel Plans

Steer Comment 57

At this stage, we have the following comments:

Separate Travel Plans should be provided for Residential and PBSA uses at the Detailed Travel Plan stage as different measures will be required for these uses and its likely there will be separate Travel Plan Co-ordinators for these land uses.

SLR Response 57

2.129 Noted and agreed.

Steer Comment 58

Surveys should first be undertaken at 6 months post occupation or 75% occupation, whichever occurs sooner.



SLR Response 58

2.130 Noted and agreed.

Steer Comment 59

The action plan is very limited and needs to be significantly expanded to include the following (which will be captured as part of the S106 Heads of Terms):

- ***Ongoing meetings between operators and residents/ students.***
- ***Ongoing feedback to residents with timescales stated.***
- ***Promotion of health and financial benefits of sustainable travel.***
- ***Promotion of cycle parking and a residents/ student bicycle user group.***
- ***Details of car club membership.***
- ***Details of arrival strategy for mobility impaired.***
- ***Details of electric charging facilities.***
- ***Launch events.***
- ***Consideration of financial incentives for cycle repairs and public transport use.***

Training opportunities/ courses should also be identified in the proposed measures.

SLR Response 59

2.131 These additional measures are all noted and considered acceptable. They would be included within the Full Travel Plan documents.

ES Chapter Review

Steer Comment 60

It is understood that Transport has been scoped out as the proposed trip generation is forecast to reduce for all modes.

SLR Response 60

2.132 No comment.

Potential Transport-related Conditions and S106 Obligations

2.133 The conditions and obligations are generally appropriate. The only point of clarification relates to the car club bay as detailed above. Although membership is considered to be an acceptable obligation, it should first be understood by which mechanism this will be delivered/secured.



3.0 Summary and Conclusion

- 3.1 This Note has been prepared to address comments raised by the Steer on behalf of LBI regarding the proposals at Archway Campus, Highgate Hill.
- 3.2 The comments raised by the Steer have been responded to directly where required.
- 3.3 SLR have responded to each of the Steer comments in detail which should satisfy the concerns raised within their response note. Accordingly, there is no reason to suggest that the proposals should not be approved.



Appendix A – Steer Response Note



To London Borough of Islington (LBI)
Greater London Authority (GLA)
Transport for London

Technical Note

LPA ref P2024/2598/FUL

From Steer

Date 31 July 2026

Project Archway Campus

Project No. 24671102

LBI Archway Campus Comments

Introduction

1. This note sets out our updated comments on the transportation aspects of the planning application to redevelop the Archway Campus. This is intended to support the preparations for the proposed Stage 3 hearing and supercedes our previous note of 6 March 2025.
2. The development proposals have altered slightly with a comparison given in **Table 1**. Due to internal reconfigurations, the quantum of C3 residential development has been reduced by 9 units.

Table 1: Comparison of Development Proposals

Component	Original Application	Revised Proposals	Difference
C3 residential units	178 units	167 units	-9 units
Student housing	242 units	242 units	No change
Ancillary commercial floorspace	116 m ²	116 m ²	No change

3. We reserve the right to make further comments in the light of additional information supplied and the Applicant’s response to the comments made below.

Documents Reviewed

4. In addition to reviewing the documents associated with the original submission in 2025, we have reviewed the following:
 - Healthy Streets Transport Assessment Addendum (HSTAA), prepared by SLR Consulting Ltd, 22 May 2026
 - Design & Access (D&A) Statement - Revised Proposals Rev 2, prepared by Grid and Niall McLaughlin Architects, May 2026
 - Framework Travel Plan (FTP), prepared by SLR Consulting Ltd, 23 January 2026
 - Outline Car Parking Management Plan (OCMP), prepared by SLR Consulting Ltd, 23 January 2026
 - Outline Construction Logistics Plan (OCLP), prepared by SLR Consulting Ltd, 23 January 2026
 - Outline Delivery and Servicing Plan (ODSP), prepared by SLR Consulting Ltd, 23 January 2026
 - Outline Site Waste Management Plan (OSWMP) prepared by Optimus, May 2026.
 - Outline Operational Waste Note (OWN), May 2026.
 - Outline Student Management Plan (OSMP), prepared by SLR Consulting Ltd, 23 January 2026
 - Planning Statement Addendum (PSA), prepared by Bidwells, May 2026.

Further Information Required

5. At this stage, there are still a number of areas where further clarification or information is needed to help us fully assess the planning application. In summary the following key changes/ clarifications are required:
- More detailed co-ordinated public realm drawings need to be provided showing how the proposed building footprints, interact with the public realm, and in turn its interaction with parking/ servicing bays, short stay cycle parking, and circulation.
 - Although much improved from previously, a further review of residential Blue Badge parking locations is required to ensure all residential core entrances are within 50 metres.
 - Further details are required in relation to the potential location of Car Club spaces on surrounding streets with costs secured by contribution.
 - Although improved from previously, drawings should be reviewed to enhance cycle routes/ access arrangements through the scheme. More detail is required on the site vehicle access points to demonstrate they can be modified to accommodate two-way cycling on the east-west route.
 - Further detail required on the connection between the scheme and the Highgate Hill cycle crossing leading towards Navigator Square.
 - Clarification is required on the proposed long stay cycle parking and use of Block B by Admin/ Holborn building residents to offset the small shortfall in long stay spaces. Further review required of short stay cycle parking calculations as these fall below policy requirements.
 - Further justification required for not meeting accessible cycle parking space requirements in the Student Tower and on access arrangement to the Holborn basement cycle store.
 - Further details required on dockless cycle parking provision.
 - Further review required of the eastern two-way servicing route and further details required of signage and enforcement and site vehicle access points.
 - A drawing is required that clearly details the proposed amendments to the site vehicle access points, overlaid on the existing highway layouts.
 - All references to the Highgate Hill loading bay need to be removed from reports.
 - Further content required in DSMP to set out comprehensive targets, measures, an action plan and the monitoring strategy.
 - Clarification required on operational waste strategy including basis of calculations and shared usage of waste stores. Waste volume calculations do not appear to reflect LBI guidance requirements.
 - Additional information requested on Student Move-in and Move-out strategy.
 - More detail is required on proposed construction arrangements, programme, trip forecasts, routing, site layout and mitigation measures. There is a need to avoid residential streets.
 - Travel Plan action plan needs to be enhanced to include more comprehensive measures.

Car Parking

6. At this stage, we have the following comments:
- A car free scheme with seven Blue Badge only parking spaces is supported (subject to the comments about access distances – see below). This comprises:
 - 1 space for the student element.
 - Six spaces for the C3 residential units (3.6%) which is just above the minimum requested number of Blue Badge spaces from the outset to meet London Plan Policies T6 and T6.1.
 - No Blue Badge spaces are proposed for the commercial use.
 - It is accepted that, due to site constraints, it will not be possible to meet the Islington Local Plan minimum requirement for 10% provision of Blue Badge spaces (Policy T3 Part G) on site for C3

residential units, which is also the London Plan aspiration (see paras 5.36 – 5.39 of the HSTAA and London Plan Policies T6 and T6.1). Instead, LBI will apply the relevant provisions of the April 2025 Planning Obligations Supplementary Planning Document (SPD), to collect a contribution towards sustainable transport measures. Based upon the currently proposed provision, there is a shortfall of 11 on-site Blue Badge spaces for the C3 residential element and one on-site Blue Badge space for the commercial element, i.e. a shortfall of 12 spaces. Therefore, LBI will be seeking a Sustainable Transport Contribution of £60,000, i.e. 12 spaces @ £5,000. (Please note this supersedes the earlier contribution of £2,000 per space referenced in our March 2025 comments).

- All vehicular parking spaces should be provided with electric vehicle charging from the outset. This can be secured by condition.
- Figure 5.7 within the HSTAA shows the distances between the buildings and Blue Badge spaces. Some of these distances are significantly exceeded. The distance from Block C to a Blue Badge space is 82m and the distance from the Clerkenwell building (56m) and Student building (61m) exceed the minimum 50 metre requirement. If the distances are exceeded, level resting places should be identified and provided. Consideration should be given to reducing these distances by finding space to accommodate another space towards the southern end of the masterplan -see potential area of search on drawing at **Appendix A**
- The S106 agreement must include provisions excluding residents from applying for on-street parking permits in the surrounding CPZ.
- The Outline Car Park Management Plan shows indicative locations as icons on **Figure 2.3**, however, no context is provided to show whether there is space on the actual streets to accommodate the bays and what facilities might be lost., Further details should be provided and associated costs including three years membership for residents to a car club should be secured by condition.
- A Detailed Car Parking Management Plan should be secured as a pre-occupation condition.

Cycle Parking

7. At this stage, we have the following interim comments:

- Proposed cycle parking is based on London Plan (2021) standards.
- The number of long stay cycle parking spaces meets the minimum requirements, for the majority of buildings with the exception of the Admin/ Holborn building (shortfall of 3 long stay cycle spaces) and Charterhouse building (shortfall of 1 cycle space). It is mentioned that this is due to retrofitting and is marginally below requirements. However, the Block B cycle store is overproviding by three cycle spaces. The Applicant should confirm whether residents within the Admin/ Holborn building could be given the access to the Block B cycle store to offset this shortfall, if the need arises.
- The number of proposed short stay cycle parking spaces does not meet minimum policy requirements, mainly because the numbers of spaces have not been rounded up. The following short stay provision should be provided per building:
 - Holborn residential – 3 spaces.
 - Admin residential – 2 spaces.
 - Charterhouse residential – 2 spaces.
 - Block A residential – 2 spaces.
 - Block B residential – 3 spaces.
 - Block C residential – 2 spaces.
 - Student Tower – 6 spaces.
 - Café – 6 spaces.
- Appendix 4 of the Local Plan states that, 20% of the cycle parking spaces provided must be accessible, of which 25% (5% of total provision) must be designated for non-standard cycles and 75% (15% of total provision) must cater for ambulant disabled cyclists. This can be met for all

long stay cycle stores except the Student Tower which can only provide 10% accessible spaces. Further justification should be provided for why this is not achievable.

- Long stay cycle store drawings have been provided in Appendix H of the HSTAA, with dimensions also provided. We have the following comments on these:
 - Block A – there appear to be two Sheffield cycle stands with a minimum distance of 525mm between centres, which is substandard compared to the minimum LCDS requirement of 1m between stands.
 - Dimensions should be provided for the Holborn and Admin building and Charterhouse building long stay cycle store layouts to ensure the suitability of the proposed cycle store layouts to be reviewed.
- Cycle repair stands should be provided in each cycle store, or within the vicinity of the cycle stores.
- It is stated that the cycle spaces in the Holborn cycle store will be accessed by four lifts and two stairs, but that the lifts will not have LCDS compliant dimensions (2.3m x 1.2m with a 1m door), due to the retrofitting of the building. Clarification should be provided on the actual dimensions of the proposed lifts and whether there is space on the stairs to provide wheeling gutters.
- A consolidated ground floor landscape plan is required to show proposed short stay cycle space locations and their interaction with the public realm. These should be colour coded, to demonstrate the assignment by land use/ Block.
- LBI Local Plan Policy H7 sets out the “minimum standard of secure storage and charging facilities equivalent to 25% of dwellings”. Blocks A and B are the only residential buildings with wheelchair housing units (4 and 6 respectively). Policy-compliant mobility scooter storage is provided in Blocks A and B in the following locations:
 - Block A Ground Floor – one space in a separate compartment
 - Block B – Two spaces provided in a separate compartment.
- As the Holborn building is retrofitted no mobility scooter spaces are proposed for that building but it is proposed to monitor the requirement for these in the Travel Plan.
- The scheme should identify locations for dockless cycle parking (Lime bikes), to ensure hire bikes are not left in areas which obstruct pedestrian circulation or emergency routes.

Servicing/Circulation

8. At this stage, we have the following comments:

- It is welcomed that passing places with widths of 5.22m and 6.22m have now been provided on the eastern internal servicing route within the masterplan. However, further review should be undertaken to demonstrate that a supermarket home delivery van (box van) can safely pass an oncoming refuse vehicle on the eastern two-way route. This could be achieved by amending the landscaping extent, if necessary.
- Chapter 5 of the HSTAA still proposes westbound only cycle movement through the site on the northern east-west route through the masterplan between the site access points. A west-east cycling option should also be explored as this will occur, with designs provided to identify how this could be integrated at the site access points with Highgate Hill and Archway Road. This would help ensure that the scheme complies with Local Plan Policy T2 Part E and London Plan Policy T5 – see the markup at **Appendix B**, which suggests provision of intermittent passing places
- The DAS also shows aspirations for a direct connection between the development and the cycle crossing on Highgate Hill towards Navigator Square – see the markup at **Appendix B**. This is supported by LBI but the Applicant needs to provide a concept drawing showing how this would work in practice.
- Further details are required on how access will be controlled, with appropriate signing/enforcement at both the eastern and western end of the vehicle access points and within the site

itself to prevent unauthorised vehicles accessing the masterplan or using the east-west route as a rat-run. Clear signage will be required within the site, to identify the permitted turning movements and restrictions on vehicle access. Full details of the proposed enforcement and signage strategy should be conditioned.

- Despite additional comments being provided in the HSTAA and Appendix E being included showing the proposed access points overlaid over the highway boundary, it is still not clear how the proposed access points will be altered compared to the existing layouts. Revisions appear to be proposed to both the Archway Road (reduction in width of crossover and revised kerblines) and Highgate Hill access points. Drawings are required that show the proposed design revisions of the access points, overlaid over the existing access layouts, taking into account LBI's desire for the access points to accommodate two-way cyclists.
- Swept path analysis has been provided for both access points, however, a swept path for the right turn egress movement onto Highgate Hill has not been provided. Visibility splays should be shown for the egress onto Highgate Hill.
- A Road Safety Audit covering the access points should be secured by condition.

Delivery and Servicing Management Plan

9. An Outline Delivery and Servicing Management Plan (DSMP) has now been submitted. We have the following comments:

- The table of contents needs correcting with regard to Appendix references as it references Appendix A as being the Site Location Plan. The Outline DSMP has an Appendix A swept path analysis sub-heading at the end but no swept paths are included in the Appendix.
- It is welcomed that the originally proposed loading bay on Highgate Hill has now been removed as stated in the HSTAA. However, Section 4.4 of Design and Access Statement still shows a loading bay on Highgate Hill. A condition is proposed to stipulate that all servicing must take place within the site to ensure compliance with Local Plan Policy T5 and London Plan Policy T7 Part G.
- Figure 4-2 of the DSMP identifies proposed locations of the cycle/ motorcycle delivery bays. Dimensions of these bays should be provided, as provision should be made for wider/ longer cargo bikes which are larger than a standard cycle.
- A refined servicing trip generation assessment approach has been agreed with TfL. TfL should provide their comments on whether this has met all the requirements, that they discussed with the Applicant. Table 4.1 of the DSMP sets out the trip rates, however clarification should be provided on the unit value these rates apply to (per unit/ 100sqm?), as this is missing from the table.
- Drawings have now been provided identifying refuse vehicle stopping locations and bin drag distances from the vehicles to each refuse store. The maximum drag distance for bins is 10m. Figure 4.3 of the DSMP identifies that the bin wheeling distances between Block C, the Clerkenwell building and the Student Tower will be significantly in excess of 10m, however it is stated that where this occurs site management will transfer the bins to/ from the collection point. This needs to be committed to by the Applicant in the Detailed DSMP.
- Clarification is required on who will be collecting student waste.
- The potential for delivery and servicing by non-motorised sustainable modes – such as and clean vehicles should be investigated and promoted in the DSP.
- The DSMP includes no mention of targets. Targets should be added to the document and could include:
 - Minimising servicing and delivery trips to be undertaken during the AM and PM network peak hours (08:00 – 09:00 and 17:00 – 18:00).
 - Minimising servicing and deliveries undertaken during the night-time period (23:00 – 06:00) to prevent disturbance to nearby residential properties.

- Specifying a maximum number of daily delivery and servicing vehicle trips to encourage the consolidation of trips to the Site.
- All, or a specific proportion, of servicing and delivery companies used, to be a member of FORS.
- Specific percentage of the Proposed Development servicing and delivery vehicles to be ‘green’ vehicles.
- Number/percentage of servicing trips to be made by non-motorised means (cycle, etc.)
- The Targets should align with the objectives and measures set out previously and should be SMART (Specific, Measurable, Achievable, Relevant, Time-bound).
- The DSMP is very light on measures and no action plan is included. An action plan should be provided with distinct measures including:
 - Management of the DSMP – This should outline who is responsible for co-ordinating the DSP, details of proposed servicing surveys, initiatives to raise awareness.
 - Servicing Vehicle Access – measures to promote routes.
 - Reducing Servicing/ Delivery trips – consideration of smart couriers, use of locally sourced couriers/ suppliers.
 - Servicing/ Delivery operations – measures including promoting details of the site’s servicing, delivery and waste management operations, encouraging deliveries outside of peak hours, FORS membership, vehicle management booking system, use of low emission vehicles.
- Although the DSMP mentions the building management team will monitor the DSMP there is no further discussion of what this will entail and how the DSMP will be managed. Further details need to be provided of who will have responsibility for managing the DSP, and a clear review and monitoring strategy including dates of baseline surveys (within 6 months of occupations or 75% occupancy, whichever occurs sooner, and future surveys (3rd and 5th year post occupation) and update periods for the DSMP. The DSMP should be reviewed and updated following each survey in dialogue with LBI.

Waste Management Plan

10. An Operational Waste Note (OWN) has been provided which sets out the proposed waste volumes, and bin numbers by land use and building. This information should be included in the Outline Site Waste Management Plan (OSWP). At this stage we have the following comments, subject to further review by the LBI Waste Team:
 - The residential waste volumes and bin numbers do not appear to have been calculated based on the LBI Recycling and Refuse Storage Requirements: Planning Guidelines (2025). Clarification should be provided on why these have not been followed.
 - Details need to be provided on the assumptions/ standards used to calculate waste volumes/ bin requirements for the student and commercial uses.
 - It is noted that twice weekly residential collections are proposed. This is becoming more common in the Borough but the applicant should be aware that they would be required to pay the additional costs, as the Council Tax only covers weekly collections
 - It is noted that the refuse store in Block C will be shared between the residential accommodation and the café unit and that in the Student Accommodation building the refuse associated with the student waste and commercial unit will also be accommodated in a shared store. Clarification is required as to how the bins will be kept separate, clearly signed to the different users, and how access will be permitted between the two different users.
 - Drawings should be provided to demonstrate that the communal residential refuse stores are within a 30m distance of each dwelling’s front door.

Student Access Management

11. An Outline Student Management Plan has been included as an Appendix to the HSTAA. Our comments are as follows:
- This includes a Move In/ Move Out strategy and stopping locations are referenced but it would be helpful to understand on a drawing where the stopping locations – use of parking bays/ loading bays will be and the zone in which vehicles can stop on the internal highway and how much capacity this will have for parked vehicles. Further details are required on how internal highway circulation would work. For example would all students enter and exit via the eastern internal highway route only, or would they use the whole internal vehicle loop in one direction?
 - It would help if an indication could be provided of the number of students that would arrive/ depart per day by vehicle during each move/ in and move/out day, on a Sat/ Sunday over 3-4 weekends.
 - It is welcomed that the Student Management Plan includes an action plan and monitoring plan and that arrival slots will be allocated.
 - A Detailed Student Management Plan should be secured as a pre-occupation condition, which could capture the above details.

Trip Generation

12. Earlier trip generation assessments have been updated to take account of the deficiencies noted in our March 2025 response. We have the following further comments at this stage:
- Peak hour car trips associated with the former use (Table 7.3 in HSTAA) is still overestimated, as it is unlikely that 100 car parking spaces would fill or empty within a single hour.
 - Some of the sites used for the residential trip generation would appear to include surveys undertaken during lockdown (Table 7.4 of the HSTAA), which may result in an underestimation of residential trips generated by the development
 - Nevertheless, it is clear that the proposed uses will generate much less daily activity than the extant uses, so there would be beneficial impacts upon the surrounding highway and public transport networks.
 - Table 7.12 of the HSTAA correctly notes that the development will generate significantly more trips by sustainable modes than by private car. In this regard, we consider that further changes are needed to the on-site layout and access points to better cater for cyclists (see comments above).

Active Travel Zone Assessment

13. The applicant has updated the earlier daytime Active Travel Zone Assessment (ATZ) to include a nighttime ATZ. The findings are accepted and contributions should be sought to address the deficiencies identified in Chapters 6 of the original TA and the Healthy Streets TA Addendum.

Construction

14. An Outline Construction Logistics Plan has been submitted. We have the following comments:
- The 'Consideration and Challenges' section is very light and should be expanded to draw out the key considerations and challenges from the local transport network section. Minimising impacts on community and educational uses, cyclists using the cycle lanes, bus users and the bus stops/ bus lanes adjacent to the site, and pedestrian users/ facilities need to be mentioned.
 - The construction programme is very vague simply saying work will commence at the end of 2027 with completion in 2030. Even at this stage, the anticipated start and end months should be specified, with a high-level programme provided which sets out the periods for the set-up and demolition, basement excavation and piling, sub-structure, superstructure, cladding, and fit-out testing and commissioning phases.

- Clarification is also required on 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.
- Further consideration should be given to construction vehicle routing with a drawing provided to show the wider vehicle routing extent particularly to the north. There is concern over construction vehicles using Hargrave Road and St John's Road, given the 7.5T weight restrictions on these roads, and the residential nature of these roads, particularly Hargrave Road. The preference would be for construction vehicles to be limited to the A1 Archway Road/ Holloway Road and Highgate Hill south of the site access.
- Swept path analysis appears to be missing from Appendix A of the document.
- The following information is also still required even in the Outline CLP document:
 - Indicative site layout plans should be provided setting out the key transport information and access strategy (including gates for pedestrians and cyclists), indicative loading/unloading points, crane locations, site welfare facilities, wheel washing locations and hoarding locations.
 - 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.
 - Exact impacts on local highways needs to be identified including on existing cycle infrastructure and bus stops.
 - 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.
 - There should be restrictions on traffic movements on the surrounding highway network during the AM and PM peak periods.
 - A Detailed CLP should be secured as a pre-commencement condition.

Travel Plans

15. At this stage, we have the following comments:

- Separate Travel Plans should be provided for Residential and PBSA uses at the Detailed Travel Plan stage as different measures will be required for these uses and its likely there will be separate Travel Plan Co-ordinators for these land uses.
- Surveys should first be undertaken at 6 months post occupation or 75% occupation, whichever occurs sooner.
- The action plan is very limited and needs to be significantly expanded to include the following (which will be captured as part of the S106 Heads of Terms):
 - Ongoing meetings between operators and residents/ students.
 - Ongoing feedback to residents with timescales stated.
 - Promotion of health and financial benefits of sustainable travel.
 - Promotion of cycle parking and a residents/ student bicycle user group.
 - Details of car club membership.
 - Details of arrival strategy for mobility impaired.
 - Details of electric charging facilities.
 - Launch events.
 - Consideration of financial incentives for cycle repairs and public transport use.
- Training opportunities/ courses should also be identified in the proposed measures.

ES Chapter Review

16. It is understood that Transport has been scoped out as the proposed trip generation is forecast to reduce for all modes.

Potential Transport-related Conditions and S106 Obligations

17. The tables overleaf set out our review of the range of transport-related conditions and S106 obligations which are likely to be required to govern the implementation of the proposals, although these may be expanded in the light of the further information sought.

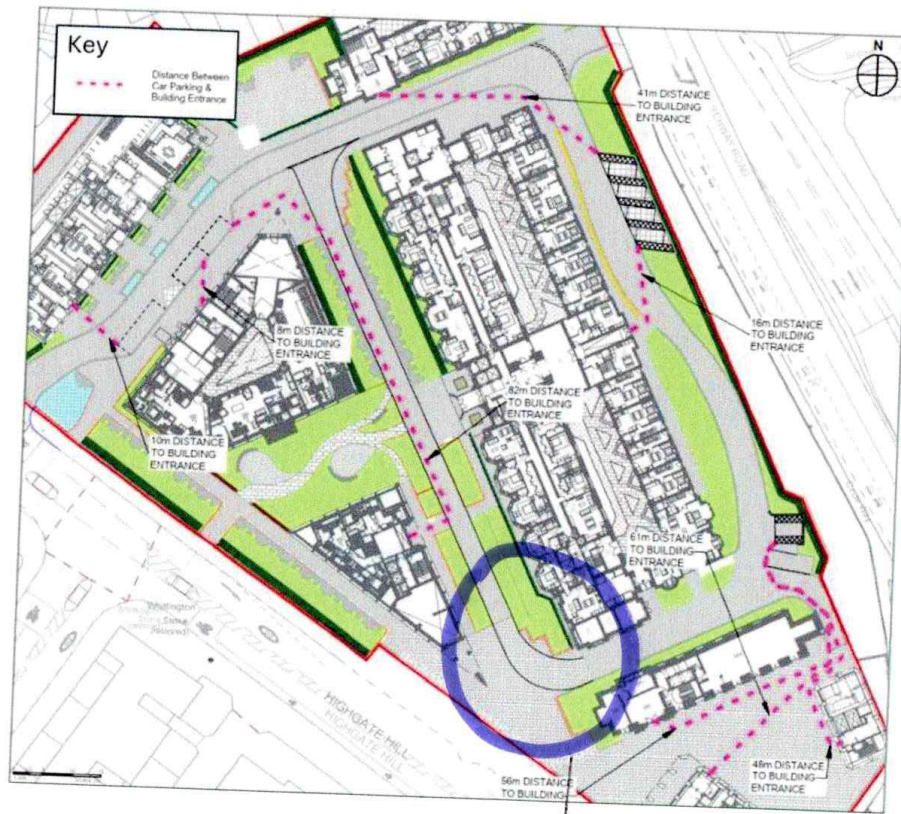
Summary of Transport-Related Conditions

Item	Comments
Car Parking Management Plan	- Related to phasing plan. - To set out management of on-site car parking spaces.
Cycle Parking Provision	- To be secured in accordance with Local Plan Policy T2 and London Plan Policy T5 with full compliance with London Cycling Design Standards (LCDS). - By building/phase, to include numbers of spaces and layouts - Cycle parking should be secured for the perpetuity of the development. - Accessible cycle parking spaces should accord with the minima set out in Appendix 4 of the LBI Local Plan.
Mobility Scooter Provision	Required in accordance with LBI Local Plan Policy H7 for residential elements catering for older and vulnerable residents
Car Parking Provision	- By building/phase, to include numbers of spaces by type. - All spaces to be Blue Badge only and fitted with electric vehicle charging points, to ensure compliance with Local Plan Policy T3 and London Plan Policy T6 - Shortfall in Blue Badge parking spaces to be address by means of the Accessible/Sustainable Transport Contribution
Servicing Provision	By building/phase, to include numbers of bays and layouts.
Refuse Provision	By building/phase, to include locations of refuse stores and sizes
Internal Road Layout	To ensure sufficient space is provided for vehicle and cycle circulation whilst taking account of constraints imposed by retaining heritage buildings
Road Safety Audits	To accompany each stage of design. To cover internal layout plus all vehicular and cycle entrances to the development
Detailed Construction Logistics Plan and Construction Traffic Management Plan	Pre-commencement and by phase.
Student Management Plan	Pre occupation. To include management of student pick-up/drop-off
Highway pre-condition survey	By construction phase and reinstatement contribution.
Delivery and Servicing Plan	Pre-occupation and by phase.

Summary of Transport-related S106 Obligations

Item	Comments
Travel Plans	• Pre-occupation and by phase
Car Capping	• Prohibiting residents from obtaining CPZ parking permits.
Car Club	• Contribution towards one on-street electric vehicle car club space, with three years membership for residents.
S278 Highway Works Agreement	• S278 agreement to cover all access points to the public highway (vehicular, cycle and pedestrian) plus associated changes including street lighting where necessary. Supported by Road Safety Audits at relevant stages
Pedestrian/cycling/public realm enhancements	• Enhancements to address deficiencies identified in ATZ audit (Chapter 6 of TA and Chapter 6 of HSTAA). • Enhancements to local bus stops (TfL to advise further) • Accessible/sustainable transport contribution of £60k, based upon policy deficiency of 12 Blue Badge spaces @ £5k per space

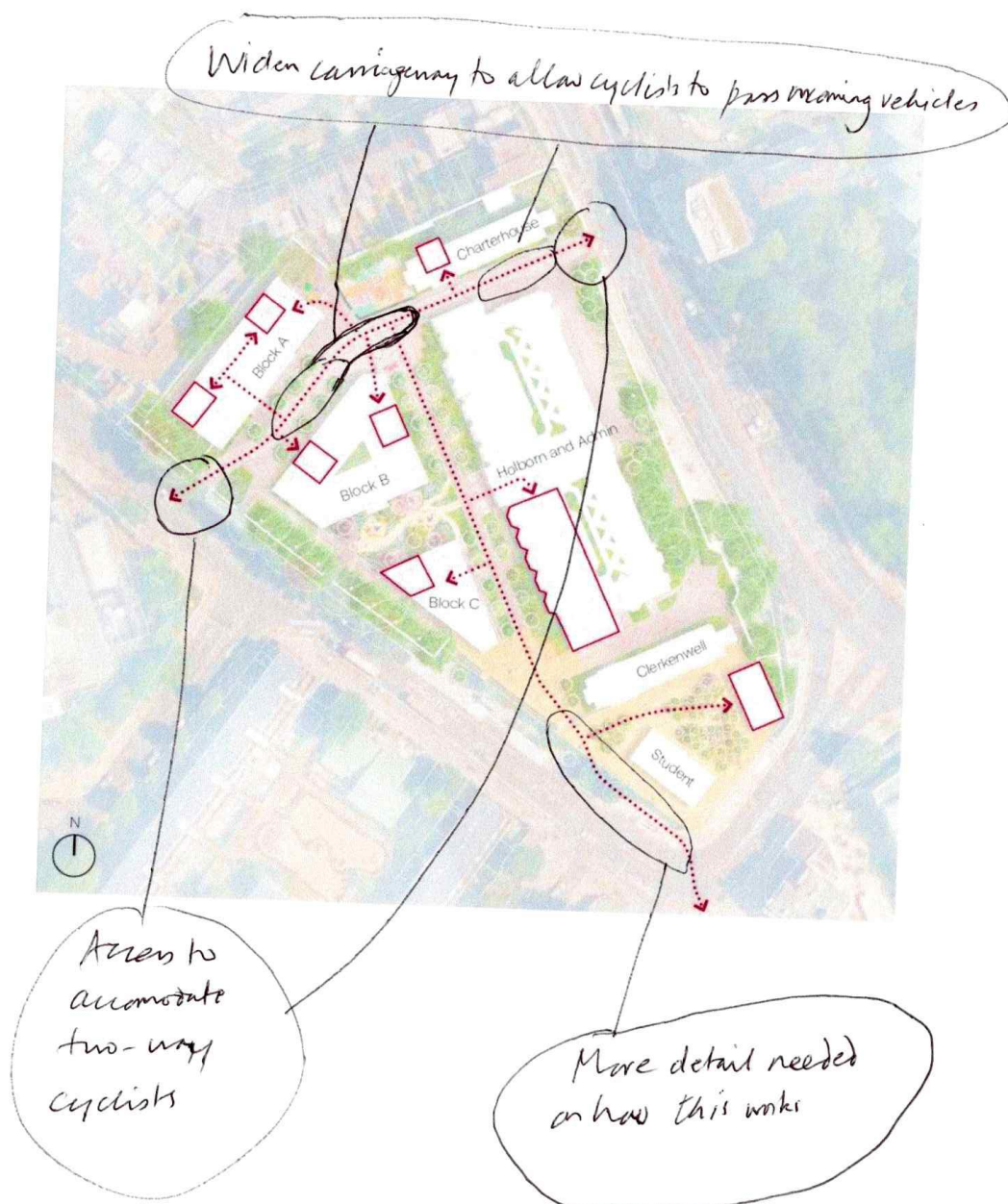
Appendix A – Area of Search for Additional Blue Badge Space



Potential Area of
Search for additional
Blue Badge
parking space

— Steer 27/07/26

Appendix B – Suggested Enhancements for Cyclists



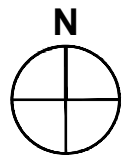
Suggested further interventions to
assist cyclists — Steer, 27/07/26

Appendix B – Site Accesses Plan

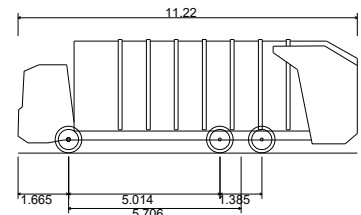


Appendix C – Swept Path Analysis





- Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
 2. White lining is indicative only.
 3. Site Plan is 8228_GA Working by LDA Design.



LB Islington Refuse Vehicle
Overall Length 11.220m
Overall Width 2.530m
Overall Body Height 3.756m
Min Body Ground Clearance 0.309m
Track Width 2.530m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 11.550m

F	Right turn egress added	JB	BH	20.08.2026
E	Site layout updated	WD	BH	21.05.25
D	Amendments made to layout	WD	BH	08.09.25
C	Amendments made to layout	WD	BH	21.08.25
B	Amendments made to layout	WD	BH	12.08.25
A	Amendments made to layout	WD	BH	31.07.25

REV	DETAILS	DRAWN	CHECKED	DATE
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STATUS:

INFORMATION ONLY

CLIENT:

Seven Capital

PROJECT:

Archway Campus
Highgate Hill

DRAWING TITLE:

Swept Path Analysis
Refuse Collection

SCALES:

1:500 at A2

DRAWN: JM	CHECKED: AJP	DATE: 02.03.2022
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DRAWING NUMBER: 226529/SK09-AT09	REVISION: F
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ACCESS

BUS LANE

ARCHWAY ROAD

1 to 25
Archway
Heights

PAUNTLLEY S

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EGRESS

LIDYARD ROAD

ARCHWAY ROAD

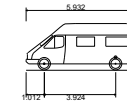
HIGHGATE HILL

Whittington Stone (restored)

PH

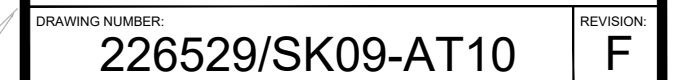
1 to 25 Archway Heights

N



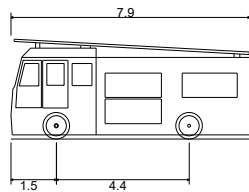
Mercedes Sprinter	
Overall Length	5.932m
Overall Width	2.020m
Overall Body Height	2.567m
Min Body Ground Clearance	0.339m
Track Width	1.996m
Lock to lock time	4.00s
Wall to Wall Turning Radius	7.600m

STATUS:		
INFORMATION ONLY		
CLIENT:		
Seven Capital		
PROJECT:		
Archway Campus Highgate Hill		
DRAWING TITLE:		
<u>Swept Path Analysis</u> Mercedes Sprinter		
SCALES:		
1:500 at A2		
DRAWN:	CHECKED:	DATE:
JM	AJP	02.03.2022





Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
2. White lining is indicative only.
3. Site Plan is 8228_GA Working by LDA Design.



Pumping Appliance	7.900m
Overall Length	2.500m
Overall Width	3.300m
Overall Body Height	0.140m
Min Body Ground Clearance	2.500m
Track Width	4.00s
Lock to lock time	7.750m
Kerb to Kerb Turning Radius	

E	Site layout updated	WD	BH	21.05.26
D	Amendments made to layout	WD	BH	08.09.25
C	Amendments made to layout	WD	BH	21.08.25
B	Amendments made to layout	WD	BH	12.08.25
A	Amendments made to layout	WD	BH	31.07.25

REV	DETAILS	DRAWN	CHECKED	DATE
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STATUS:
INFORMATION ONLY

CLIENT:
Seven Capital

PROJECT:
**Archway Campus
Highgate Hill**

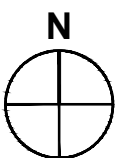
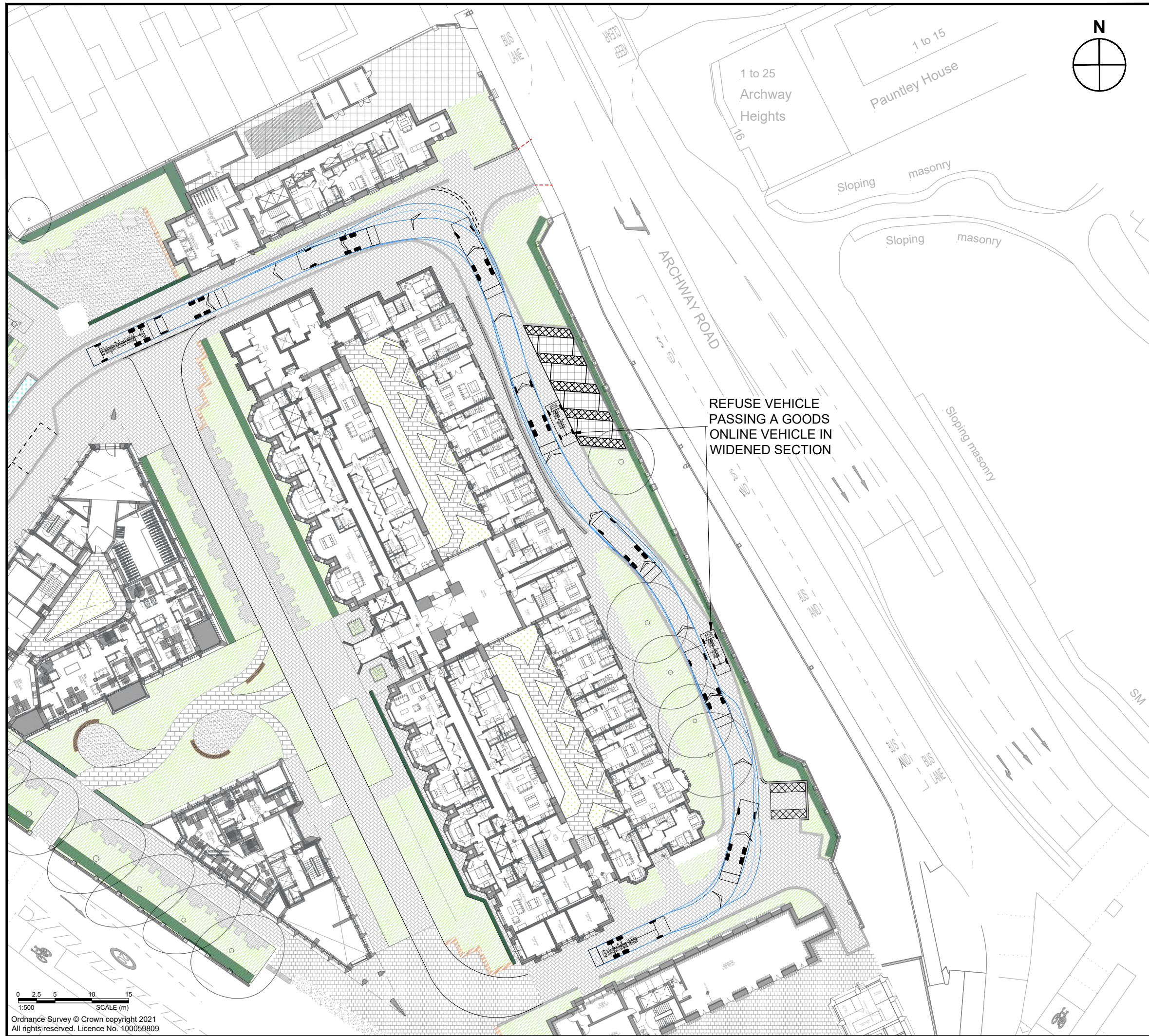
DRAWING TITLE:
**Swept Path Analysis
Emergency Fire
Vehicle**

SCALES:
1:500 at A2

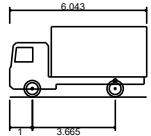
DRAWN: JB	CHECKED: BY	DATE: 19.06.2025
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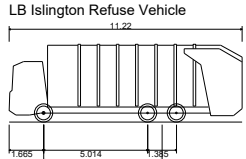
DRAWING NUMBER: 226529/SK09-AT14	REVISION: E
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- Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
 2. White lining is indicative only.
 3. Drawing based on 226529_SK09



GOL Vehicle - Sprinter
Overall Length 6.043m
Overall Width 2.026m
Overall Body Height 3.100m
Min Body Ground Clearance 0.345m
Track Width 2.026m
Lock to lock time 4.00s
Wall to Wall Turning Radius 6.700m



LB Islington Refuse Vehicle
Overall Length 11.220m
Overall Width 2.530m
Overall Body Height 3.756m
Min Body Ground Clearance 0.309m
Track Width 2.530m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 11.550m

REV.	DETAILS	DRAWN	CHECKED	DATE
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STATUS:

INFORMATION ONLY

CLIENT:

Seven Capital

PROJECT:

Archway Campus
Highgate Hill

DRAWING TITLE:

Swept Path Analysis
Refuse Vehicle Passing
Goods Online Vehicle

SCALES:

1:500 at A3

DRAWN:	JB	CHECKED:	BH	DATE:	20.08.2026
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DRAWING NUMBER:	226529/SK09-AT15	REVISION:	-
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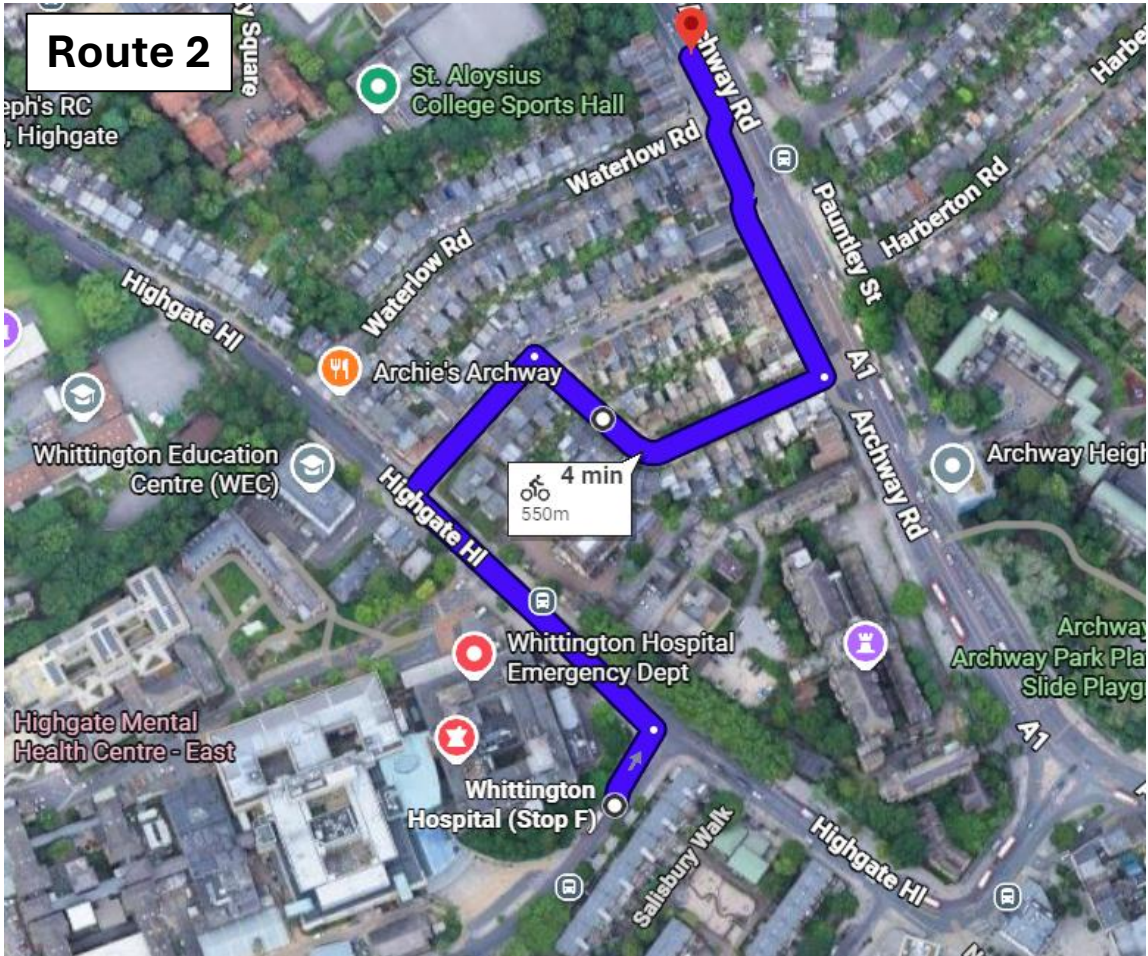
Appendix D – Cycle Routing Plans



Cycle Route Comparison



Route	Cycle Distance	Cycle Journey Time
1 – Waterlow Road	450m	4 minutes
3 – Tollhouse Way	550m	4 minutes



Route	Cycle Distance	Cycle Journey Time
2 - Despard Road/Lidyard Road	500m	4 minutes

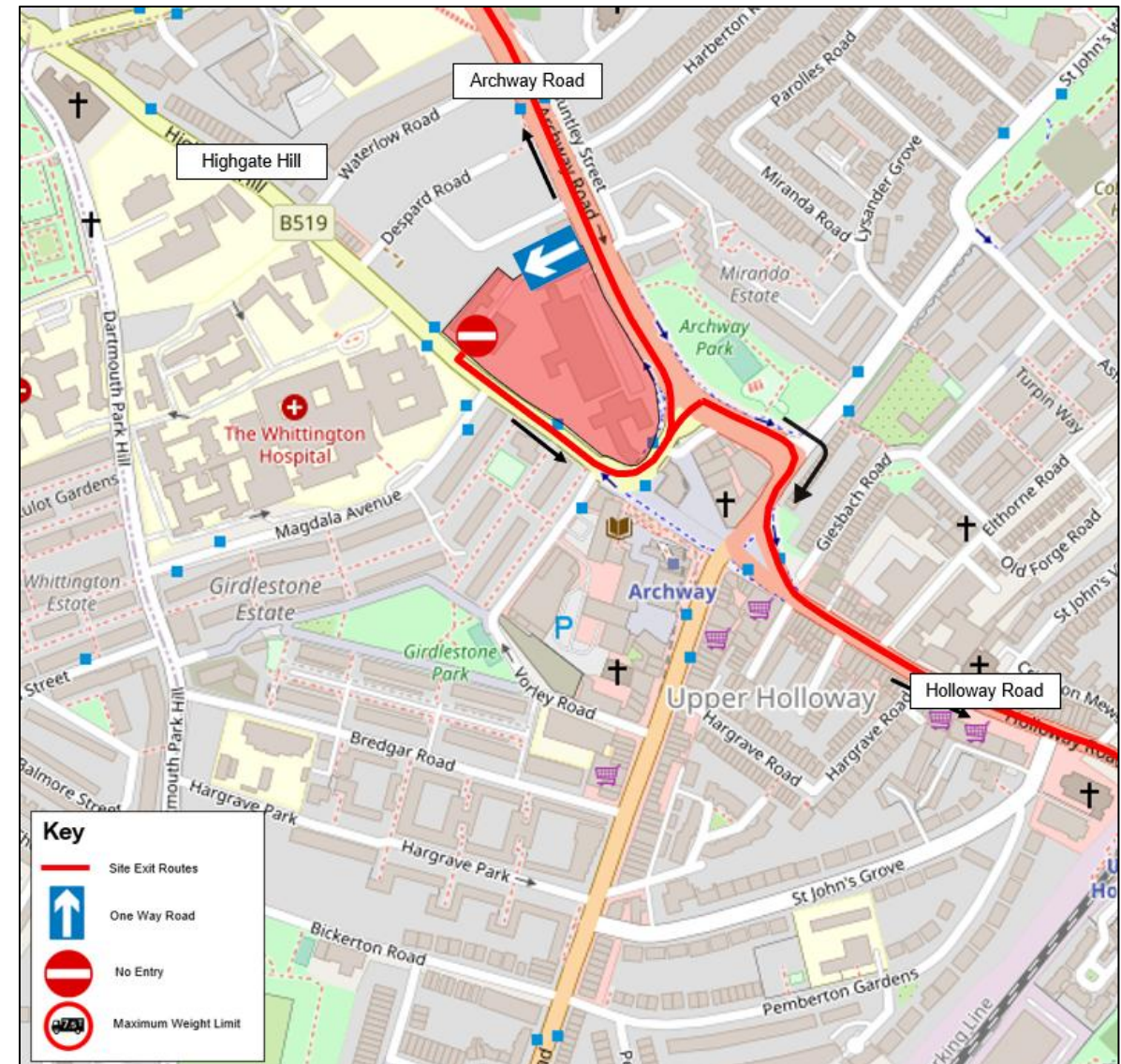
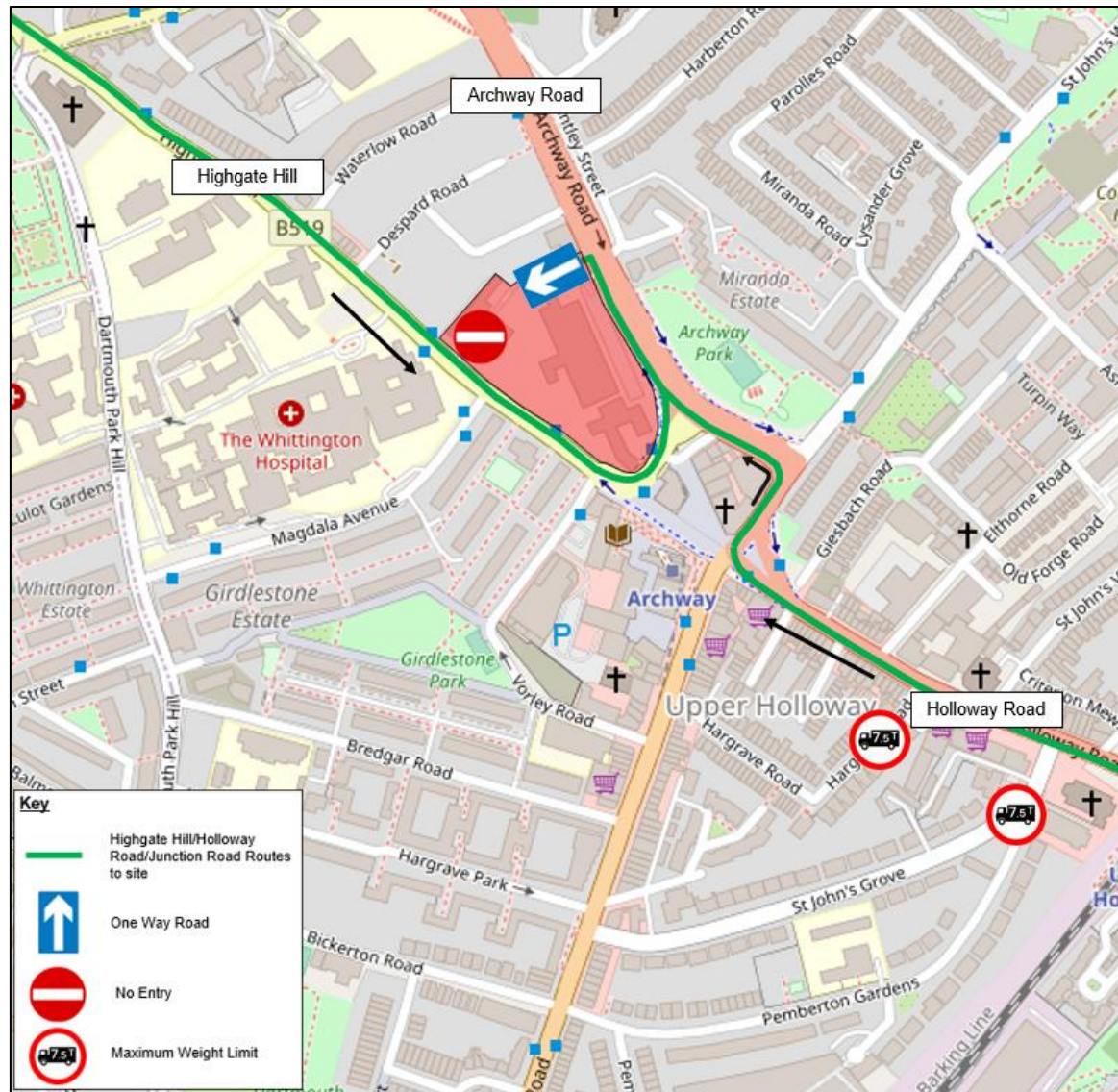


Route	Cycle Distance	Cycle Journey Time
4 – Contraflow Route	410m	4 minutes

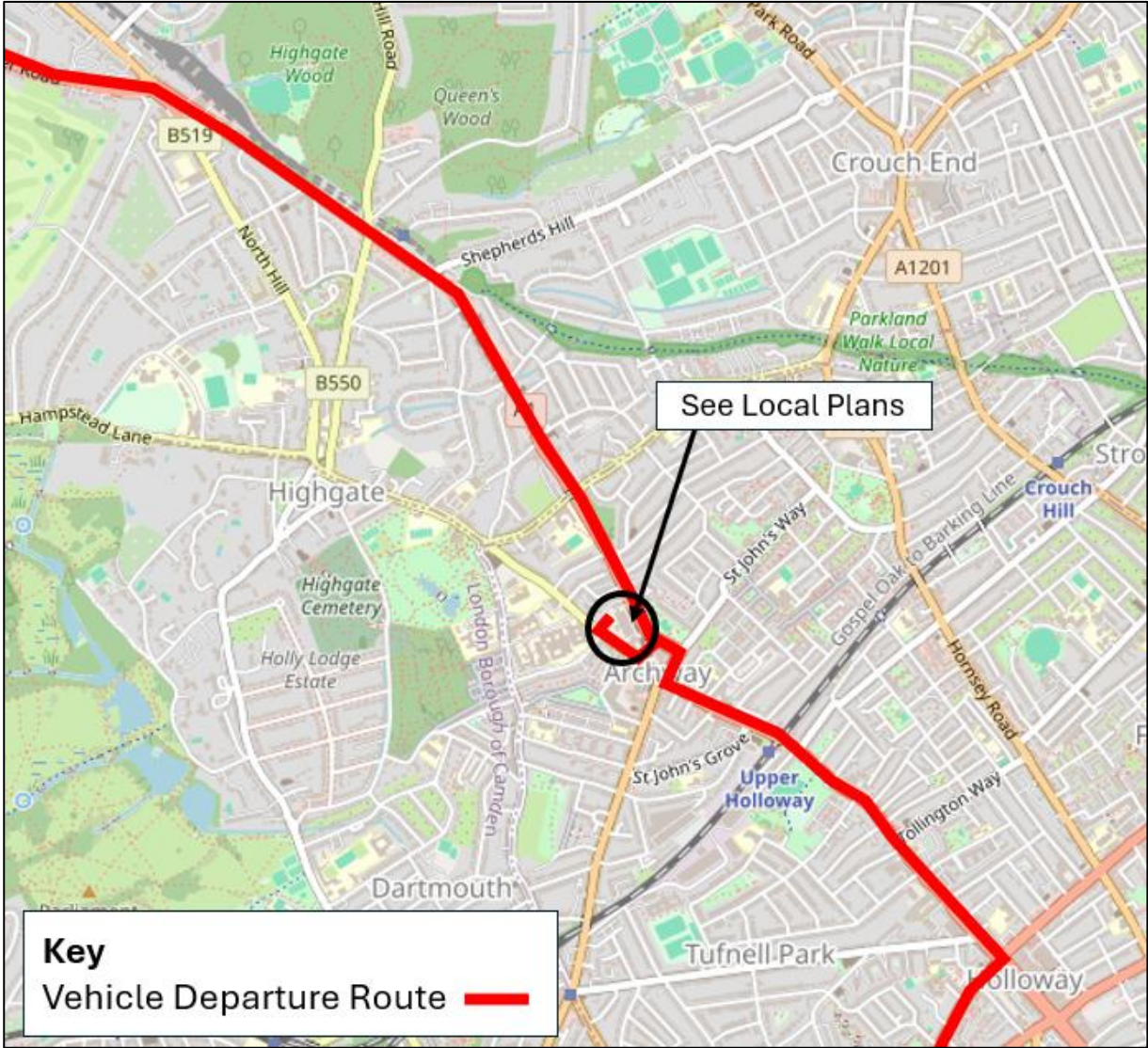
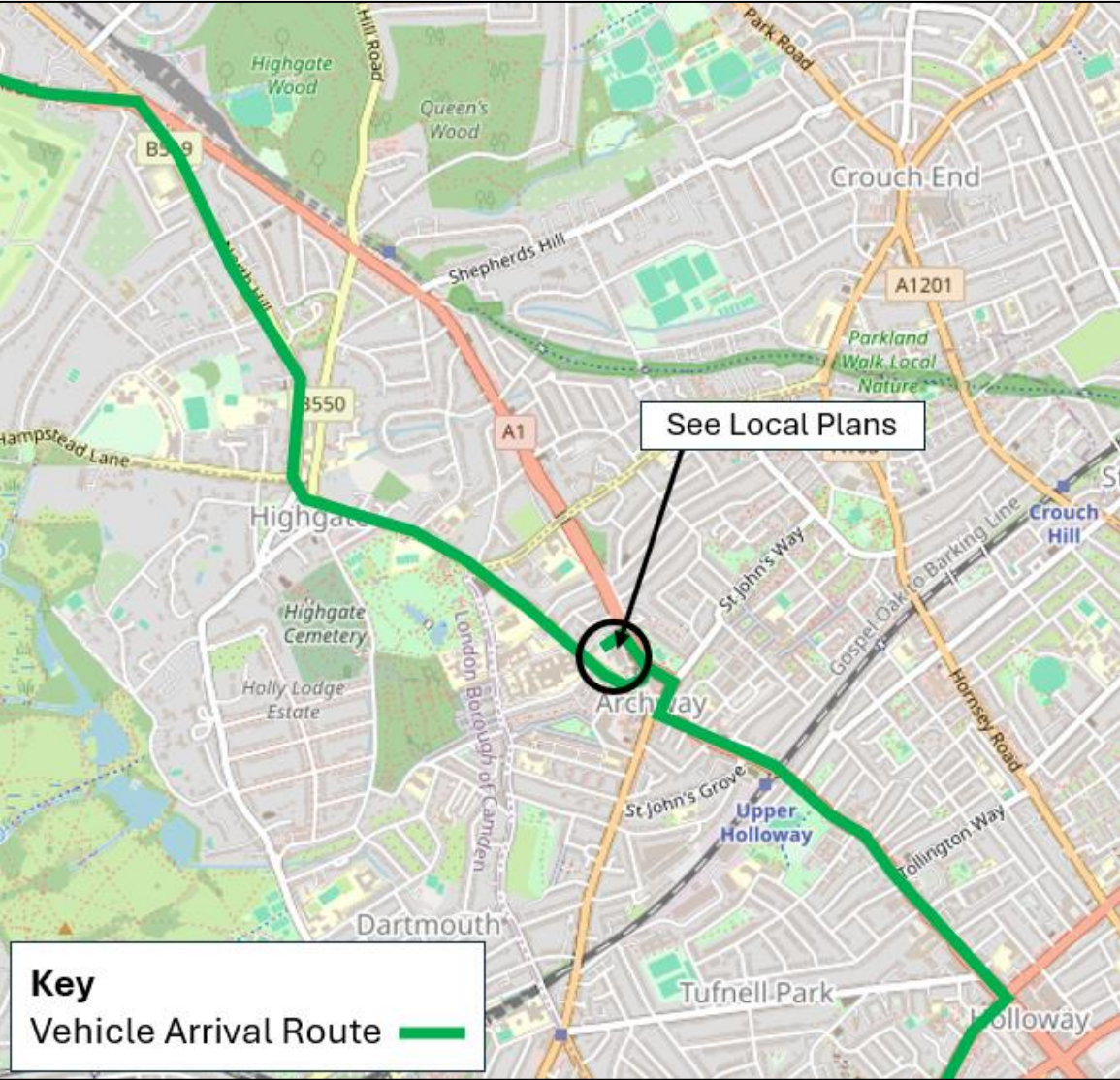
Appendix E – Construction Routing Plans



Construction Routing Local Drawings

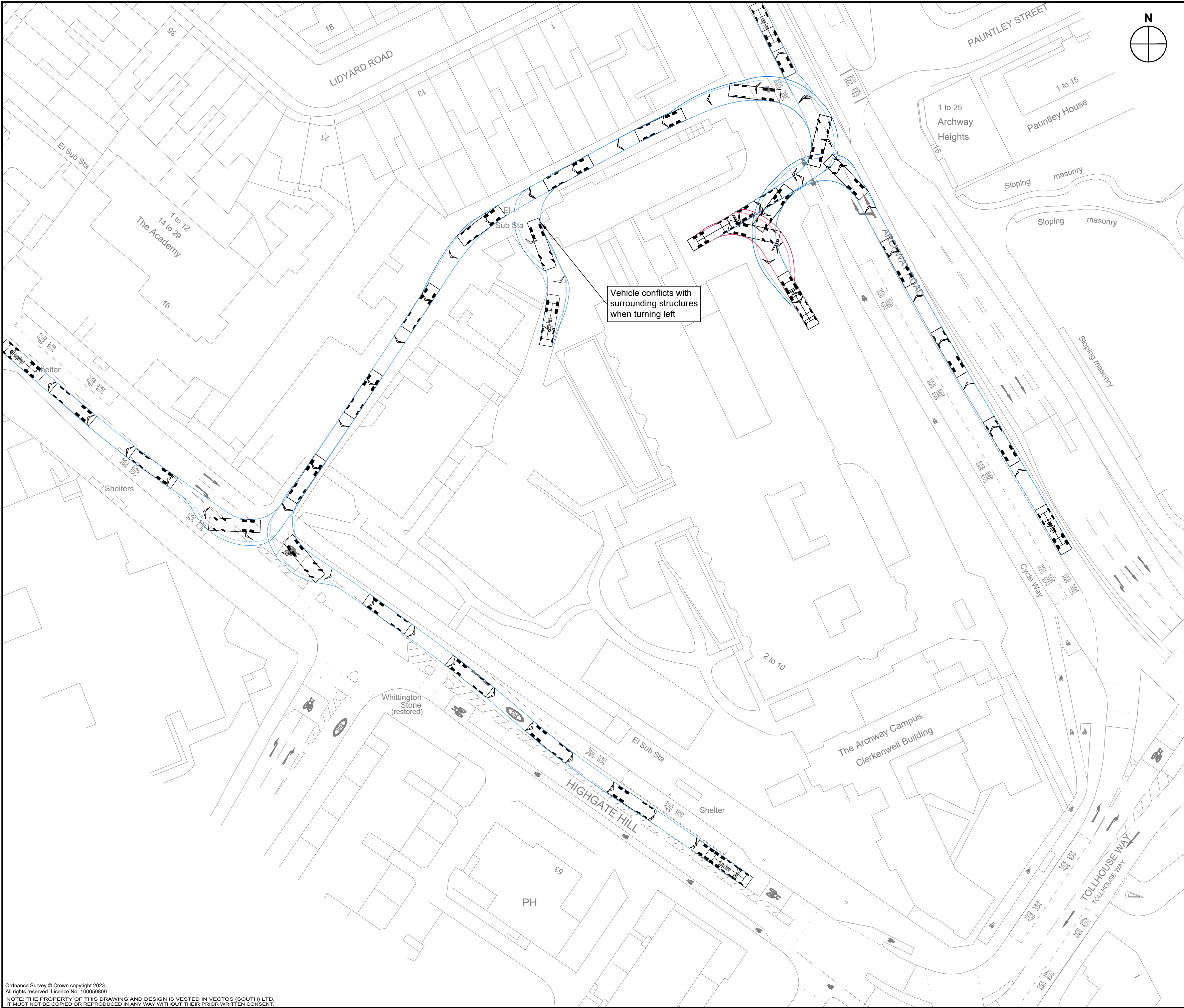


Construction Routing Regional Drawings

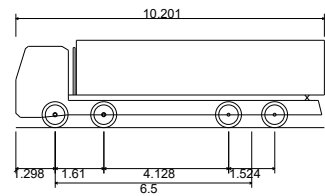


Appendix F – Construction Swept Path Analysis





- Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
 2. White lining is indicative only.
 3. Site Plan is 8228_GA Working by LDA Design.



Large Tipper
Overall Length 10.201m
Overall Width 2.495m
Overall Body Height 2.890m
Min Body Ground Clearance 0.341m
Track Width 2.471m
Lock to lock time 6.00s
Kerb to Kerb Turning Radius 11.550m

REV	DETAILS	DRAWN	CHECKED	DATE
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STATUS:

INFORMATION ONLY

CLIENT:

Seven Capital

PROJECT:

Archway Campus
Highgate Hill

DRAWING TITLE:

Swept Path Analysis
Existing Site
Large Tipper

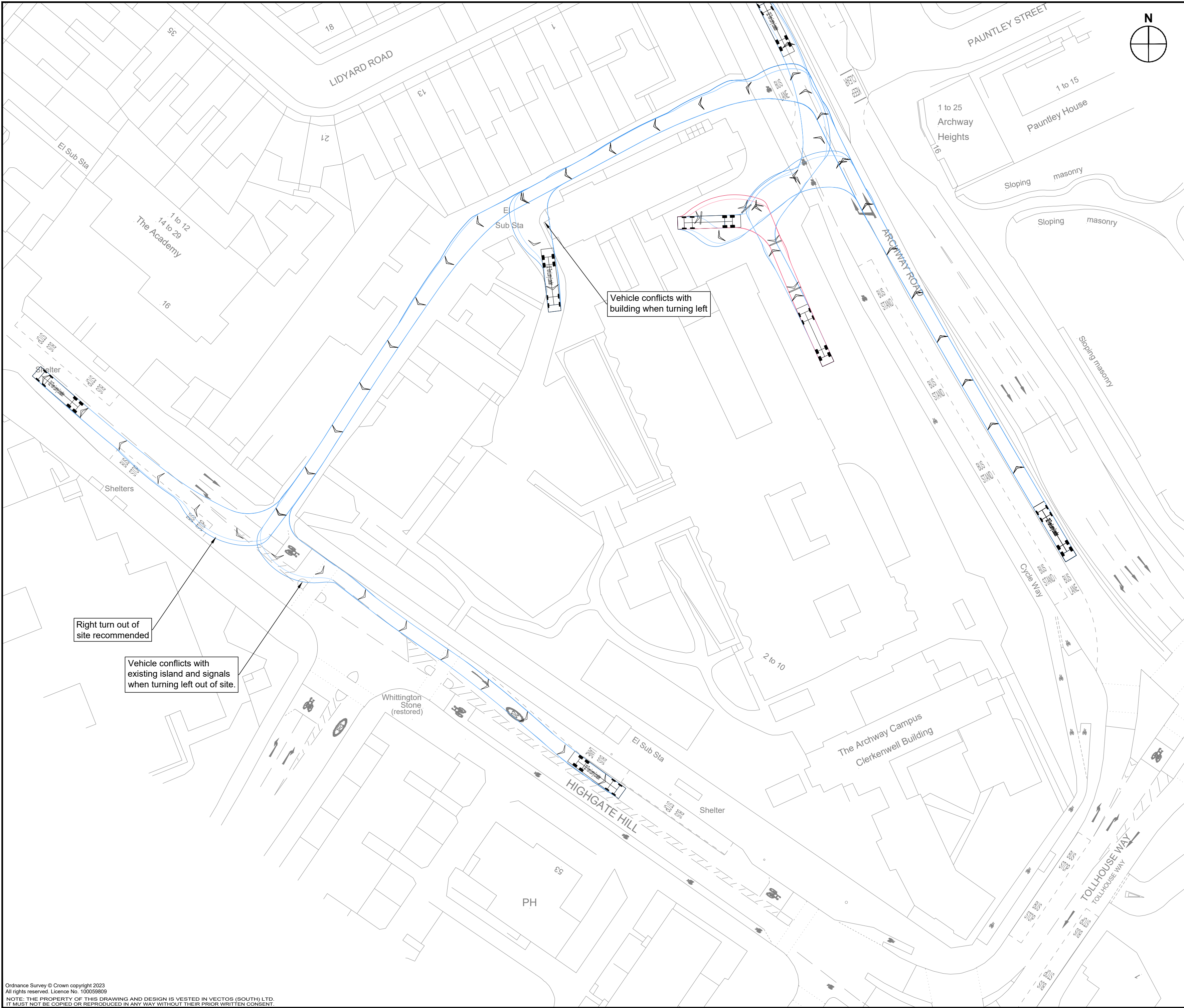
SCALES:

1:500 at A2

DRAWN: JB	CHECKED: BY	DATE: 27.06.2025
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DRAWING NUMBER: 226529/AT/K01	REVISION: -
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Notes:

1. This is not a construction drawing and is intended for illustrative purposes only.
2. White lining is indicative only.
3. Site Plan is 8228_GA Working by LDA Design.

32 Ton Lorry Loader

Overall Length	12.500m
Overall Width	2.495m
Overall Body Height	2.890m
Min Body Ground Clearance	0.341m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.550m

REV	DETAILS	DRAWN	CHECKED	DATE
-	-	-	-	-

STATUS:

CLIENT: Seven Capital

PROJECT: Archway Campus Highgate Hill

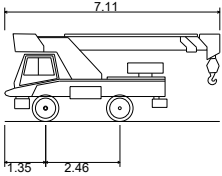
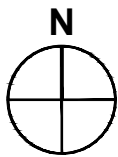
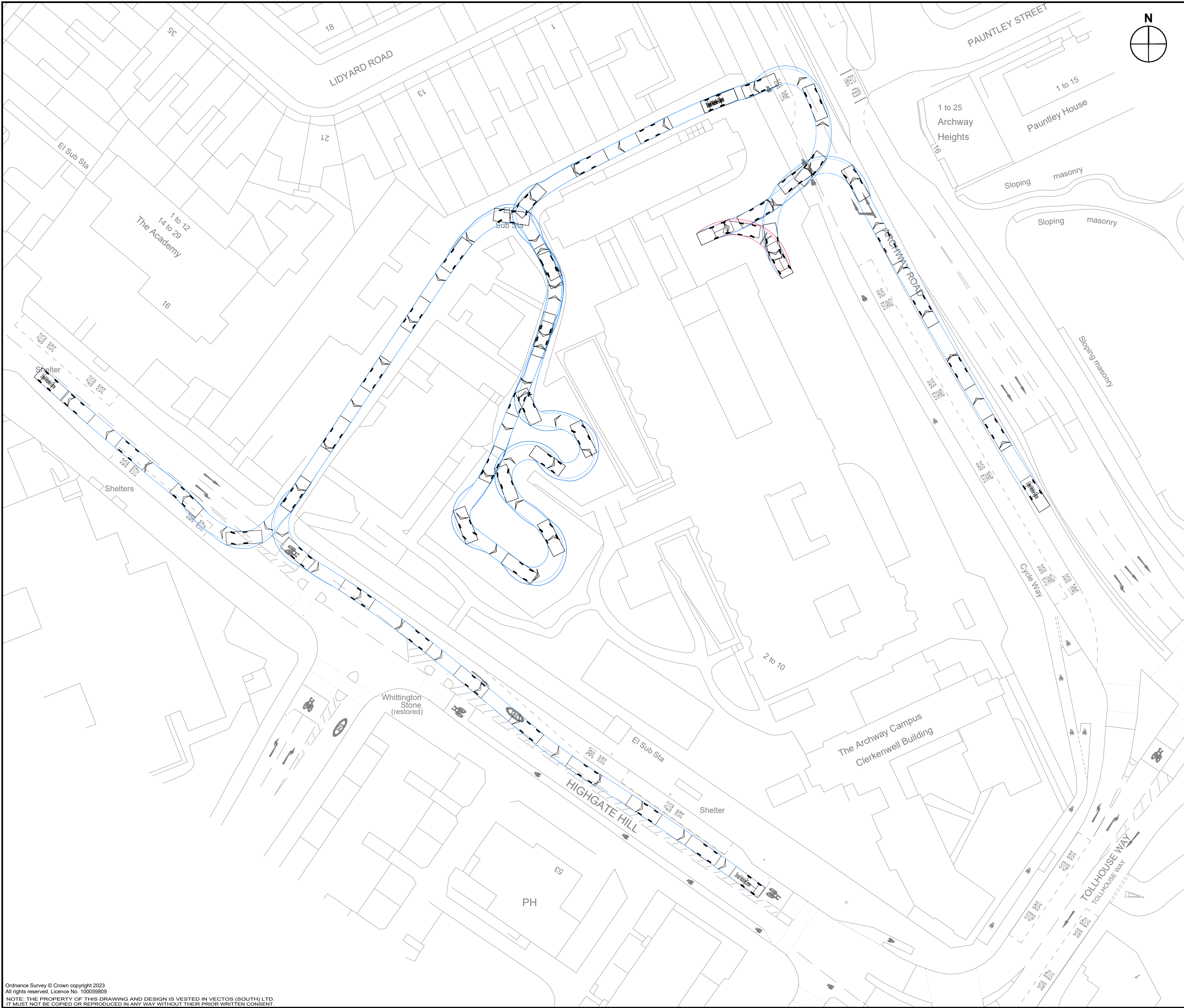
DRAWING TITLE: Swept Path Analysis Existing Site H.I.A.B. Access

SCALES: 1:500 at A2

DRAWN: JB CHECKED: BY DATE: 27.06.2025

DRAWING NUMBER: 226529/AT/K02

REVISION: -



Small Mobile Crane	7.110m
Overall Length	2.500m
Overall Width	2.895m
Overall Body Height	0.427m
Min Body Ground Clearance	2.500m
Track Width	4.00s
Lock to lock time	5.800m
Kerb to Kerb Turning Radius	

- Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
 2. White lining is indicative only.
 3. Site Plan is 8228_GA Working by LDA Design.

REV	DETAILS	DRAWN	CHECKED	DATE
-	-	-	-	-

STATUS:

INFORMATION ONLY

CLIENT:

Seven Capital

PROJECT:

Archway Campus
Highgate Hill

DRAWING TITLE:

Swept Path Analysis
Existing Site
Small Mobile Crane

SCALES:

1:500 at A2

DRAWN:	JB	CHECKED:	BY	DATE:	27.06.2025
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DRAWING NUMBER:	226529/AT/K03	REVISION:	-
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Making Sustainability Happen