Greater London Authority

Review of the Environmental Statement Addendum for Archway Campus

Final Review Report

Final Review Report
Prepared by LUC
October 2026



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Chapter 1
Introduction

1.1 LUC, in association with Xi Engineering and DPR, has been commissioned by the Greater London Authority (GLA) to provide a critical review of the Environmental Statement Addendum (ESA) (dated January 2026) for the Archway Campus development.

1.2 The ES has been prepared under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). Under the EIA Regulations part 1, 4 (5) planning authorities are required to *"ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement".* LUC is a Registrant of the Institute of Sustainability and Environmental Practitioners (ISEP formerly known as IEMA) EIA Quality Mark, and the LUC lead reviewer is individually accredited to the Institute. Details of the expertise of each of the team members involved in the review are set out in **Appendix A** to this review.

1.3 The purpose of this review is to determine whether the ES meets the statutory requirements of the EIA Regulations[1] and relevant guidance[2]. The assessments undertaken must be of a high enough quality to provide confidence in the reported impacts of the Proposed Development.

1.4 If issues with the adequacy or robustness of the ES are identified, the review identifies what additional information is required to address concerns.

1.5 The review focusses on the EIA and does not provide comment on any additional planning judgements that need to be made by the GLA. Where the securing of an environmental commitment or obligation is considered to warrant a planning condition, the proposed direction of such requests will be provided. The conclusions of the review report may be used by planning officers at the GLA when determining the application.

Planning History

1.6 A Full Planning Application was submitted to the London Borough of Islington (LBI) in October 2024 (Application Ref: P2024/2598/FUL) for residential led development consisting of new housing and student accommodation, hard and soft landscaping scheme, public realm enhancements associated

[1] Town and Country Planning (Environmental Impact Assessment) Regulations 2017] – add a footnote regarding transitional arrangements and new regulations if considered necessary.

[2] Including the National Planning Guidance and the ISEP EIA Quality Review Criteria.

access and infrastructure at Land at Archway Campus, 2-10 Highgate Hill (hereafter referred to as 'the Site').

1.7 The description of the submitted scheme is as follows: *"Application for full planning permission in relation to:*

1) The change of use, partial demolition, restoration and refurbishment of "Holborn Union Main Range, Admin Block and Charterhouse Buildings" to provide residential accommodation (Use Class C3)

2) Complete demolition of "Furnival Building", "Ely Building", "Staple Building", and other ancillary structures, to allow for the construction of three new buildings to provide residential accommodation (Use Class C3) and local commercial/community space (Use Class E/F2)

3) The change of use, partial demolition, restoration and refurbishment of "Clerkenwell Buildings" to provide student accommodation (Use Class Sui Generis)

4) Complete demolition of "Nurses Accommodation Buildings" to allow for the construction of a new design-led tower to provide for student accommodation (Use Class Sui Generis), and associated structure with basement to provide bicycle storage and amenity space

5) Delivery of a comprehensive hard and soft landscaping scheme, delivering public realm enhancement to include: a central boulevard, public square, heritage gardens and communal play

6) Associated access, servicing and plant."

1.8 An ES was prepared to accompany the application and was validated in September 2024 (2024 ES). The Mayor of London called in the application for determination in May 2025 after LBI's notification they were minded to refuse the planning application. LBI commissioned an independent review of the 2024 ES as part of the determination process from Waterman Infrastructure and Environment Limited and the report identified areas where further information may be required as part of Regulation 25 requests.

1.9 The ES Addendum (ESA) has now been submitted to address the matters in the determination process from the Waterman review and the updates to the design.

1.10 The scheme amendments are summarised below:

"Block A:

- *Keyworker units omitted, now 100% social rent units.*
- *Revised layout to incorporate deck access to flats, achieving 100% dual-aspect units.*
- *Total unit count reduced from 36 to 25 units; Total habitable room increased from 83 to 109 rooms.*
- *Length of block increased ~1.5m but note length of 7 storey volume reduced ~3.5m (see attached diagram for reference).*

Block B:

- *Revised layout of southeast 3b5p unit (on GF and 1F) – 2 additional rooms achieved. Total habitable room increased from 103 to 105 rooms.*
- *Fire changes: Core layout mirrored and lobby incorporated to north units, to avoid >2m deck width.*

Block C:

- *Access changes: Bike store layout revised to allow for direct access from entrance foyer.*
- *Access changes: Café back of house revised to incorporate staff end of trip facilities.*
- *Fire changes: Upper floor core layout revised to incorporate ventilation shafts and avoid door swing clash with evac lift landing. Note this has necessitated omitting middle balcony on south elevation (attached correspondence for reference).*

Student Tower:

- *Fire changes: Studios replanned to have hob away from exit*
- *Fire changes: Core replanned to accommodate revised smoke vent sizes*
- *Access changes: Accessible units replanned to provide for larger 1 and ½ width bed clearance.*

The landscaping on Charterhouse Way has also been revised as a result of the Block A redesign."

Review Report

1.11 A criteria-based approach developed by ISEP, hereafter referred to as 'the ISEP criteria', has been used to inform this review[3]. The criteria cover:

- EIA regulatory compliance (COM3);
- EIA context and influence (the scope of the ES, coverage of alternatives and evolution of the scheme design, and consultation) (COM4);

[3] Full details of the ISEP EIA review criteria are available at: https://unionsquare.landuse.co.uk/DMS/view_document.aspx?ID=1687067&Latest=true The review of the ES has been undertaken in the context of the updated EIA Regulations and relevant guidance for the specialist topics assessed, in addition to the ISEP criteria.

- EIA content (the baseline conditions, assessment of impacts, and mitigation measures and management) (COM5); and
- EIA presentation (quality of the ES presentation and the Non-Technical Summary (NTS)) (COM6).

1.12 The review includes an assessment of the scope of the EIA. However, it is noted the Applicant did not request a Scoping Opinion from LBI/ GLA. The Applicant instead undertook consultation and engagement with key stakeholders, including officers from the LBI, Islington Design Review Panel, Transport for London, Historic England and the local community. Which instead informed the scope of the EIA.

1.13 This review report aims to determine whether the ESA addresses the issues raised by the Waterman review.

1.14 The review identifies a list of clarifications required from the Applicant and a summary of any potential requests for further information under Regulation 25 of the EIA Regulations (referred to hereafter as potential Regulation 25 requests) to be made to the Applicant, as appropriate. Potential Regulation 25 requests are identified in the first instance to enable the applicant to address the requests.

1.15 Once the Applicant has received the clarifications and potential Regulation 25 requests from GLA they are invited to submit further information addressing the points raised.

1.16 Any further information received is reviewed and conclusions drawn as to whether the additional information is satisfactory and whether any Regulation 25 matters remain. These conclusions are then included in this report, and the document completed as the Final Review Report (FRR).

1.17 The structure of the report is as follows: Section 2 checks for Regulatory Compliance; Section 3 details review findings on the EIA Context and Influence (Scoping, Alternatives and Consultation)[4]; Section 4 provides commentary on the presentation of the ES and Non-Technical Summary[5]; Sections 5-14 are topic specific reviews relating to each topic covered in the ES[6].

1.18 LUC's review was issued to the GLA and the Applicant in July 2026. The Applicant subsequently provided a response to the clarification points raised. Chapter 15 of this updated review report provides reassessment conclusions as relevant.

[4] ISEP EIA Quality Mark – ES Review Criteria, COM4: Context and Influence
[5] ISEP EIA Quality Mark – ES Review Criteria, COM6: EIA Presentation
[6] ISEP EIA Quality Mark – ES Review Criteria, COM5: EIA Content

Chapter 2
Initial Regulatory Checklist

2.1 This section checks for the presence or absence of each item below, in accordance with COM3 'Regulatory Compliance' of the ISEP review criteria. Further detail is provided in the following sections in relation to the way each aspect of the EIA has been undertaken and is presented in the ES. Criteria A-I represent the minimum information which must be provided to constitute an ES.

2.2 It should be noted that the table below only confirms whether or not the information required has been provided in its most basic form, e.g. presence or absence of the topics in Criteria D, and does not confirm regulatory compliance.

2.3 As noted in the ISEP EIA Quality Mark: Registrant Guide, a number of the criteria under COM3 cover similar subjects to criteria set out in COM4, COM5 and COM6 which are reviewed below, and as such, there is inevitably some overlap. The review undertaken in subsequent sections of this report provides further detail in relation to the way each aspect of the EIA has been undertaken and is presented in the ES, focussing on the quality of the information provided.

Table 2.1: Regulatory Checklist

Criteria		Yes/No
A	Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation?	Yes, this is considered in Chapter 4: Description of Proposed Development (including Assessment of Alternatives).
B	Does the ES contain a section, or sections, that outline the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects?	Yes, this is considered in Chapter 4: Description of Proposed Development (including Assessment of Alternatives).
C	Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment?	Yes, this is considered in the relevant technical chapters (Chapters 6 -10)

Criteria		Yes/No
D	In the light of the development being assessed has the ES identified, described and assessed effects on: ■ Population ■ Human Health ■ Biodiversity (Fauna & Flora) ■ Land ■ Soil ■ Water ■ Air ■ Climate ■ Material Assets ■ Cultural Heritage ■ Landscape ■ Risk of major accidents and disasters ■ Other	Yes, this is considered in the relevant technical chapters (Chapters 6 -10).
E	Does the ES attempt to set out the interaction between the factors set out in COM3 D) above?	Cumulative effects are considered in Chapter 9: Cumulative Effects.
F	Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects?	Yes, this is considered in the relevant technical chapters (Chapter 6 -10).
G	Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects?	Yes, this is considered in the relevant technical chapters (Chapters 6 -10)
H	Has a Non-Technical Summary been produced containing an outline of the information mentioned in COM3 A) to G)?	Yes, see standalone Non-Technical Summary.
I	Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES?	Yes. Limitations are set out in the relevant technical chapters (Chapters 6 – 10).

Chapter 3
EIA Context and Influence

Scoping and Assessment

3.1 The Applicant sets out the scope of the EIA in Chapter 2: Methodology of the ESA, with justification for how this conclusion was reached in Table 2.4A. Those topics included in the ES and expected to incur significant environmental effects were decided during pre-application discussions with LBI, which is considered acceptable.

3.2 As noted in the Waterman review, a formal Scoping Opinion was not sought from LBI, and the scope of the EIA was established on the basis of key issues arising during pre-application discussions. However, a Scoping Opinion is not mandatory in EIA Regulations, and the approach is considered acceptable. The review identified further information required for the scoping out of some topics, which are further assessed for robustness in Chapter 10 -14 of this review.

3.3 The Applicant sets out the overarching methodology of the ES Elements including the assumptions and limitations of the assessment and the structure of each technical chapter, which is considered acceptable.

3.4 The Waterman review indicates baseline conditions were not sufficiently identified in the 2024 ES. The Applicant has made the relevant amendments for the ESA to adequately demonstrate the physical attributes of the Site and information on what is proposed to be demolished and retained.

Identification of Sensitive Receptors

3.5 Chapter 2: Methodology of the ESA sets out the approach to determining the value and sensitivity of receptors. Sensitive receptors are also identified and discussed within the technical chapter of each assessment (Chapters 6-10), which is considered acceptable.

Alternatives including Iterative Design

3.1 Chapter 4: Proposed Development and Alternatives summarises the main design alternatives considered and details the environmental considerations that contributed to the design of the Proposed Development.

3.2 Alternative site options were not considered due to the Proposed Development being located on brownfield land and allocated under policies CS1 Archway and Allocation ARCH3

Former Archway Campus in delivering residential housing for the LBN. This is considered acceptable.

Description of Development

3.3 The Waterman review highlights that the Applicant omitted details on the description of the appearance of the proposed buildings and the depth of the basements. These details have been adequately included in paragraphs 4.26-4.35 of the ESA.

3.4 The Waterman review also notes reference to Appendix 4.1 should be made when describing the Proposed Development and a table should be included showing the height of different buildings. Whilst some of this information is provided in paragraph 4.18-4.25, the Applicant omits information on the m AOD for the new Blocks A and C (**EC1**). It is also noted that the Applicant does not refer to Appendix 4.1 when describing the Proposed Development, but reference can be assumed as the appendix is noted in the start of the Chapter 4: Proposed Development and Alternatives.

3.5 The Applicant sufficiently includes information on the description of works to facilitate the Proposed Development including a phasing programme and construction methodology. However, the Waterman review states that a framework or outline has not been provided for the CEMP with a summary of environmental control measures identified in the EIA chapters. The Applicant has not provided this in the ESA and should clarify the expected control measures associated with the construction and demolition phases of the Proposed Development (**EC2**).

Consultation

3.6 The relevant consultation undertaken for each technical topic, including any updates to this, has been noted in the appendices associated with Chapters 6-10, which is considered acceptable. Reference to the Planning Statement has been made for details of the consultation and engagement included in the EIA process. The consultation has been stated to have informed the scope of the EIA, which is considered acceptable.

Table 3.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
EC1	The Applicant should clarify the m AOD of the new Blocks A and C, as mentioned in the Waterman Review.
EC2	The Applicant should clarify the expected control measures associated with the construction and demolition phases of the Proposed Development.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 4
EIA Presentation

Overall Presentation (ES Quality)

4.1 The ESA is generally well presented. The structure of the ESA is presented in Table 1.1A of Chapter 1: Introduction. A list of abbreviations is also provided to aid the reader.

4.2 Any additions or omissions to the overall assessment are noted in blue text which helps the reader identify any updates made in the ESA compared to the 2024 ES.

4.3 The use of maps, figures, diagrams and tables are appropriate and include the Site's location and boundary, along with the retention and demolition strategy and cumulative schemes. However, it would have been useful if the Applicant provided the operational appearance within the ESA text and displayed the location of the main environmental receptors in figures that are noted in paragraph 6.373. The figures and diagrams are laid out within the text which makes it easier to conceptualise the proposals.

4.4 As highlighted in the Waterman review, the resolution of the results text is considered acceptable. However, it would have been useful information for the Applicant to set out the list of figures used in the ESA, similarly to the list of appendices provided, along with their volume number.

4.5 Details of the Site are included in Chapter 3: Site Context and details of the Proposed Development are included in Chapter 4: Description of Proposed Development (including Assessment of Alternatives). These chapters both clearly describe the Site and the Proposed Development appropriately.

4.6 The ESA is presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking. Additionally, the ESA is an appropriate length for the Proposed Development, sensitivity of the receiving environment and the significant effects identified.

Non-Technical Summary

4.7 The Non-Technical Summary (NTS) is provided as a standalone document and outlines the proposed changes to the 2014 Consented Masterplan. It is of a reasonable length and provides an overview of the scope and aims of the ESA,

describing the Site, its surroundings and the Proposed Development.

4.8 The NTS makes use of supporting figures dispersed within the main body of the text. However, the NTS does not provide a figure of the main location of key environmental constraints noted in paragraph 6.373, which is useful information for the reader.

4.9 The Waterman review comments have been addressed and are satisfactory subject to the technical topic reviews.

4.10 Generally, the NTS provides sufficient information for a member of the public to understand the likely significant environmental effects of the Proposed Development without having to refer to the main text of the ES, subject to a review of clarifications raised in technical chapters below.

Table 4.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
N/A	None.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 5
Review of Chapter 6: Cultural Heritage

Scope of the EIA

5.1 The ESA addresses the heritage matters identified during the determination process and the clarifications and Regulation 25 requests related to the heritage topic advanced by the Waterman Review. It also outlines the changes of the design that have occurred since the planning application submission.

5.2 The Regulation 25 requests identified by Waterman Review are:

- Lack of assessment of construction impacts on locally listed buildings to be retained
- Inventory of historic features needed
- Need for historic building recording during soft strip of locally listed buildings.
- Archaeological assessment

5.3 The current document reviews the Applicant response of the Waterman Review presented in the Appendix 2.1A – Waterman Review Response Table. All the responses have been reviewed and if considered to fulfil the Waterman's clarification requests, they have not been further discussed. Therefore, the current review only addresses Regulation 25 and clarifications not considered to have been clarified in the Applicant response document.

Policies, Guidance and Legislation

5.4 The NPPF references have been changed thorough the ESA and the Appendix 6.3A Legislation and Planning Policy; however, the date in Table A6.3.2 of Appendix 6.3A still refers to a previous version of the document. The Applicant should update the table (**CH01**).

Methodology

5.5 It is understood that heritage assets can have level of importance and significance varying from its strict statutory definition; however, all designated heritage assets should be considered, in the methodology, of at least national/high importance. A medium importance for grade II registered parks and gardens, grade II listed buildings and conservation

areas would not be appropriate. If their high importance (through national designation) is assessed to be lower for a specific reason, this should be explained case by case. The Applicant should modify the methodology accordingly (**CH02**).

5.6 Paragraph 6.60 of the ESA states: *"professional judgement is also required to determine the nature of the likely effects. For example, there will be cases where a high magnitude of impact produces a major scale of effect, on the basis that the component is prominent or noticeable, but notwithstanding that the quality of effect is beneficial as a consequence of design quality or other benefits*". The methodology tables should identify significant effects deriving from the Proposed Development based on level of importance/ sensitivity against magnitude of impact. The design and benefits should be considered as part of the impact, if relevant to the contribution of the changes to the significance of the heritage assets. Otherwise, they refer to mitigation or offsetting elements and should be wholly separated from this phase of the assessment. The Applicant should clarify this distinction in the methodology (**CH03**).

5.7 As previously flagged by the Waterman Review, there is the option to assign the nature of the effect as either 'Beneficial', 'Adverse' or 'Neutral'. This means that in cases like the Church of St Joseph, in paragraph 6.539, the effects are expressed as minor/moderate neutral. This is confusing as it is not clear whether the Proposed Development results in significant effects to the heritage asset. The Applicant should clarify this (**CH04**).

5.8 Although it is understood that professional judgment can modify the results of the effects deriving from the application of the methodology tables, the explanation on how the judgment has been applied is, at times, missing or contradicting with the methodology tables. This is the case with the examples below, which were spot checked, but may be the case with application of the methodology to all assets which should therefore be checked (**CH05**). For example, for Highgate Cemetery, in paragraph 6.459, which states: "*the susceptibility would be Medium, and the sensitivity would be Low. The Magnitude would be Nil and the effect would be None*". However, following the methodology tables, the heritage value should be Very High, the susceptibility Medium, therefore the sensitivity should be High. The Applicant should clarify the conclusions reached.

5.9 In paragraph 6.514, it is not clear what part of the 1 Junction Road Locally Listed Building's significance will benefit from the Proposed Development (**CH06**). In paragraph 6.585, it is not clear what part of the setting of Highgate Village will change due to the Proposed Development and therefore it is not clear how the conclusions in paragraph 6.586 were reached (**CH07**).

Assessment

5.10 It is understood that mitigation measures will apply to record locally listed buildings within the Site that will be demolished or altered, as requested by the Waterman Review. This is acceptable.

Non-Technical Summary

5.11 The NTS sets out a summary of the heritage effects reported in the ESA.

Table 5.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
CH01	The Applicant should update the Table A6.3.2 with references to the latest NPPF.
CH02	The Applicant should consider all designated heritage assets to be of at least high importance/value and should only assign a lower level where this is justified by the assessment, with a clear explanation provided. Thus, the Applicant should modify the methodology accordingly.
CH03	The design and benefits should be considered as part of the impact only if relevant to the contribution of the changes to the significance of the heritage assets. Otherwise, they refer to mitigation or offsetting elements and should be wholly separated from the assessment phase. The Applicant should clarify this distinction in the methodology.
CH06	In paragraph 6.514, the Applicant should clarify what part of the 1 Junction Road Locally Listed Building's significance will benefit from the Proposed Development.
CH07	In paragraph 6.585, the Applicant should clarify what part of the setting of Highgate Village will change due to the Proposed Development to explain the conclusion reached.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
CH04	The methodology allows combinations of effects expressed as minor/moderate neutral, making difficult to understand if significant effects arise from the Proposed Development. This is the case with the Church of St Joseph, in paragraph 6.539, the conclusions for which should be clarified.

CH05	Professional judgment is at times used to reached effects conclusions without explanation or in contradiction with the methodology, such as in the case of Highgate Cemetery, in paragraph 6.459. The methodology used and conclusions reached for all assets, including Highgate Cemetery, should be further checked, and the results amended if inconsistencies are identified.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 6
Review of Chapter 7: Townscape and Visual

Scope of EIA

6.1 A TVIA was undertaken in the 2024 ES. This ESA completely replaces the Townscape and Visual Chapter.

6.2 The TVIA in the 2024 ESA was reviewed by Waterman who raised some points of clarification (suggesting that some policies were missing; some moderate impacts incorrectly classified as non-significant; and baseline diagrams requested) which the Applicant responded to (confirming policies are discussed in Appendix 6.3, confirming no significant effects will occur at construction, and confirming baseline diagrams are in Appendix 6.5).

6.3 Paragraph 1.10 of the states that the Revised TVIA chapter has been updated *"to address methodology concerns, significance criteria, and provide enhanced baseline information and visual documentation"*. However, the sensitivity/ magnitude tables and significance matrix do not contain any blue text and therefore appear not to have any changes made from the 2024 ES. The Applicant should clarify whether any methodology or significance criteria have changed since the 2024 ES, and if so, what has changed (**TVIA1**).

Design Changes

6.4 Paragraph 1.8 of the ESA sets out a summary of the design changes. Most changes are to do with changes to the intended ownership and detailed design changes/ internal layout changes. Changes which could affect the TVIA are:

- increase in block length in Block A by 1.5m (but 7 storey volume reduced by 3.5m); and
- landscaping revised.

6.5 The general mass appears to be the same. The Applicant should confirm if the two bullets above are the relevant changes to TVIA or if there are any others (**TVIA2**).

Baseline

6.6 Nothing notable has changed to the baseline environment against which effects are assessed. Some additional views/ visualisations have been added at the request of consultees:

- Islington's Local View 4
- Views 36-39 relating to Highgate Cemetery
- Views 40 and 41 from Waterlow Park
- Views 42 and 43 (Local Views 4a and 4b from Archway Road to St Paul's Cathedral)
- Views 44 and 45 (Local Views 5a and 5b from Archway Road to St Paul's Cathedral).

Assessment

6.7 The assessment remains the same as for the 2024 ES (the ESA adds text to explain why there will be no significant effect on townscape during construction, as requested by Waterman, but there is no change in judgements).

6.8 Some new viewpoint assessments have been added but there are no changes to effects on receptors assessed for the submitted scheme.

6.9 Since the general scale and mass of the Proposed Development remains the same (as shown on the visualisations), this seems appropriate.

6.10 The key significant effects are on the character of the Site and its immediate surrounds (Archway Campus and Victorian residential area that surrounds it), and on Islington's designated views LV4 and LV5, Parliament Hill (non LVMF view) and residents in the local area.

Visualisations

6.11 A 'Visualisation Pack' has been included as Appendix 6.2A. A number of views show the 'original submission' with a few select views showing the 'revised submission'. The Applicant should explain the reasoning for why not all the views show the revised submission (**TVIA3**).

6.12 The Proposed Development is shown in View 10A (LV5a), View 10B (LV5b), View 20 (Macdonald Road / Highgate Hill) and View 21 (Magdala Avenue / Highgate Hill) but these do not look any different from the submitted scheme – the Applicant should clarify if there is any difference in these views and why these have been selected to show the Proposed Development (**TVIA4**). The Applicant should clarify what the red line in View 10B represents (**TVIA5**).

6.13 The Proposed Development is also shown in View 22 Despard Road / Highgate Hill) although in this view the difference in detailed architectural design of the lower building is visible. This is not enough to affect the results of the TVIA.

6.14 Additional visualisations have been provided from:

- Highgate Cemetery (Views 36-39) – these show that the top of the tower would be visible rising above existing buildings on the edge of the cemetery in winter – the clearest view is from View 38 (eastern view), but it won't be visible from the Mausoleum.
- Waterlow Park (Views 40-41) – these show that the tower will be hidden behind trees even in winter.
- Islington Local View 4 (View 42 and 43) – which shows the dominance of the proposed tower in the view.
- Islington Local View 5 (Views 44-45) – which show the prominence of the tower in the view.

Secondary, Cumulative and Combined Impacts

6.15 There don't appear to be any changes to the cumulative assessment previously undertaken.

Mitigation and Management

6.16 As with the submitted scheme, the Applicant states that mitigation measures are embedded through the design of the Proposed Development. This review is a technical EIA review and does not comment on the success of the design.

Non-Technical Summary

6.17 The NTS sets out a summary of the effects reported in the ESA.

Table 6.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
TVIA1	The Applicant should clarify whether any methodology or significance criteria have changed since the 2024 ES, and if so what has changed.
TVIA2	The general mass of the Proposed Development appears to be the same as the submitted scheme. The Applicant should confirm which aspects of the design changes affect the TVIA.
TVIA3	A 'Visualisation Pack' has been included as Appendix 6.2A. A number of views show the 'original submission' with a few select views showing the 'revised submission'. The Applicant should explain the reasoning for why not all the views show the revised submission.

TVIA4	The Proposed Development is shown in View 10A (LV5a), View 10B (LV5b), View 20 (Macdonald Road / Highgate Hill) and View 21 (Magdala Avenue / Highgate Hill) but these do not look any different from the submitted scheme – the Applicant should clarify if there is any difference in these views and why these have been selected to show the revised submission.
TVIA5	The Applicant should clarify what the red line in View 10B represents.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 7
Review of Chapter 8: Wind Microclimate

Scope of EIA

7.1 The Proposed Development has the potential to lead to changes in the surrounding wind conditions, and as a result, Wind Microclimate has been 'Scoped In' to the ESA. As part of a Regulation 25 request, the ESA on wind microclimate re-examines suitable target wind conditions, details on wind mitigations, and details of wind climate statistics and atmospheric boundary layer simulations.

7.2 National, Regional, and Local planning and policy guidance with respect to Wind Microclimate are provided in Appendix 8.1A Key Legislation, Policy and Guidance. The referenced guidelines are widely used in the UK, as well as in the local region where the Site is located. The relevant policies from each of the documents have been clearly presented.

7.3 Baseline wind conditions were assessed using a wind tunnel model covering a 400m radius around the site, simulating an atmospheric boundary layer. The baseline includes existing site conditions plus nearby consented or under-construction developments assumed built out. The wind tunnel used a 20m working section with a 3m × 1.5m cross-section.

7.4 The following four assessment configurations were assessed across the site for effects due to wind microclimate:

- **Assessment Scenario 1:** Baseline (The Existing Site with the Existing Surrounding Buildings);
- **Assessment Scenario 2:** The Proposed Development with the Existing Surrounding Buildings;
- **Assessment Scenario 3:** The Proposed Development with the Existing Surrounding Buildings, Proposed Landscaping and Mitigation Measures; and
- **Assessment Scenario 4:** The Proposed Development with the Cumulative Surrounding Buildings, Proposed Landscaping and Mitigation Measures.

7.5 Paragraph 8.27 of the ESA states there are five assessment scenarios, but only four are presented and considered. The Applicant should confirm if this is a typo or if one scenario has been omitted and needs to be corrected **(WM1).**

7.6 To obtain accurate results, the wind tunnel was designed with a working section which is 20 m in length, with a 3 m x 1.5 m cross sectional area, covering an area within a 400 m radius from the centre of the Site.

7.7 Wind speeds were recorded at 1.5 m above any surfaces expected to be used for pedestrian activity for every assessment scenario, considering all wind directions at 10° or 30° intervals

7.8 Wind direction correction factors are provided in Table 8.3A of the ESA. The correction factors for wind directions should match the 10° and 30° wind direction angles used in the assessment scenarios, as referenced in Paragraph 8.8 (**WM2**).

7.9 A model of the Proposed Development was included in the wind tunnel, and wind speeds were measured at 159 locations using Irwin probes at key receptor locations including amenity spaces.

7.10 The revised assessment incorporates additional sensitive receptors (Highgate Hill bus stops, private gardens, and the proposed play space) and updates the methodology to reflect the final design, including specified wind mitigation trees (Betula 'Edinburgh' and Liquidambar styraciflua, 7–10m at planting).

7.11 An atmospheric boundary layer was included in the wind tunnel model to accurately predict the effects of local buildings and terrain on atmospheric wind speeds and turbulence. This boundary layer consists of spires, fences and distributed roughness blocks

7.12 Approximately 30 years' worth of meteorological data were obtained from the meteorological station at London Heathrow Airport. The calculations used to correct the wind conditions from the stations to the local site were performed in the software package ESDU (Engineering Sciences Data Unit) Item01008. This is considered acceptable.

7.13 Seasonal wind rose plots are shown in Figure 8.1A of the ESA and show prevailing winds from the south-west. At present, it is quite difficult to differentiate between the different wind speed regimes with the current colour scheme employed. This should be updated to better differentiate the different regimes. (**WM3**)

7.14 The Lawson Comfort Criteria were utilised to assess the suitability of wind conditions across the site. Specifically, the City of London Lawson Comfort Criteria, developed following the London Docklands Development Corporation (LDDC) criteria were used. Table 8.1A of Vol 1 Main Report - Addendum (Jan 26) provides the comfort categories and the corresponding wind speed thresholds. This is an appropriate set of assessment criteria for the given Site.

7.15 Table 8.2A of the ESA provides a clear definition in terms of strong wind and the safety threshold of 15 m/s for more than 0.025% of the time (approximately 2.2 hours of the year), also referred to as S15. This is acceptable.

7.16 A significance effect scale is determined by comparing predicted wind conditions with intended pedestrian use target wind conditions, based on the Lawson Comfort Criteria, and, where relevant, against baseline conditions. Strong winds affecting safety are assessed separately and are always considered significant, requiring mitigation. The scale of wind effects when wind conditions are calmer than required have been removed in Paragraph 8.35 of the ESA, and it is not clear why. (**WM4**)

7.17 Any risk to pedestrian safety due to strong winds is classified as Major Adverse. This is considered acceptable and is frequently used in wind microclimate assessments.

7.18 The 2024 ES assessment was based on a worst-case design including a 97 m Apex Tower and taller residential blocks. The Proposed Development reduces the tower to 82 m and lowers residential block heights, with supplementary testing confirming robustness.

7.19 Since the original wind tunnel assessment, minor layout and design changes have been made (e.g. block reconfigurations, access and fire safety updates, and small dimensional adjustments). These are not considered to materially affect wind conditions.

Baseline

7.20 Assessing baseline conditions without landscaping or vegetation could be overly conservative and exaggerate the benefits of the Proposed Development. This has been addressed by also assessing the Proposed Development without landscaping and by not treating any resulting benefits as significant. This is considered acceptable and represents a common approach for wind tunnel testing.

7.21 Conditions across thoroughfares range from suitable for sitting to business walking in the windiest season and sitting to leisure walking in summer. No probes indicate uncomfortable conditions.

7.22 Entrance conditions are generally suitable for their intended uses, ranging from sitting to leisure walking, with minor exceedances at some locations but all remaining acceptable. Existing bus stops are typically suitable for sitting or standing, with shelter in some cases providing additional protection.

7.23 Amenity spaces generally achieve conditions suitable for standing or sitting in summer, with most locations meeting intended use requirements. No wind safety concerns have been identified.

Assessment

7.24 The results for Assessment Scenario 2 shows that the Proposed Development would generally result in acceptable wind conditions across roads, entrances, bus stops, and amenity areas. Most impacts are Neutral or Minor Adverse and are not significant.

7.25 Minor adverse effects are identified at some pedestrian routes, entrances, seating areas and amenity spaces around the Apex Tower, Clerkenwell Building and affordable blocks due to slightly windier conditions.

7.26 Two areas were identified with potential strong wind effects: the south-east corner of the Apex Tower and the gap between the Apex Tower and Clerkenwell Building. Mitigation measures, including a porous wind screen and targeted tree planting (Betula 'Edinburgh' and Liquidambar styraciflua), have been incorporated to reduce these effects. With mitigation included, the residual wind effects are expected to be acceptable.

7.27 For Assessment Scenario 3, the assessment found that all previously non-significant effects in Scenario 2 remained non-significant, while areas that had previously experienced significant effects were improved to acceptable conditions.

7.28 For pedestrian routes and building entrances, the mitigation reduced wind conditions to levels suitable for their intended use. The only remaining business walking condition occurred along a cycle path where lingering is not expected, while all building entrances achieved appropriate comfort levels, resulting in not significant residual effects.

7.29 Amenity spaces across the site, including areas around the Clerkenwell Building, Apex Tower, Holborn Square and the affordable housing blocks, were improved to conditions suitable for sitting and/or standing during the summer. Although one bench area west of Apex Tower remained one comfort category above the target, it was considered appropriate for its intended short stay use, and all amenity spaces were assessed as having not significant residual effects. This is all considered acceptable.

Secondary, Cumulative and Combined Impacts

7.30 The cumulative wind assessment for Assessment Scenario 4 included the approved Vorley Road Bus Stand and 4 Vorley Road (P2022/1221/FUL) scheme alongside the Proposed Development. Other nearby schemes, provided in Paragraph 8.128 in the ESA, were excluded from the wind tunnel assessment because they were considered too far from the Site to have a meaningful influence on the wind microclimate. This is all considered acceptable.

7.31 The results of the cumulative scenario found that wind conditions across pedestrian routes, roadways, building entrances and bus stops remained suitable for their intended uses. All locations were assessed as having not significant effects, with some entrances and bus stops experiencing minor beneficial improvements compared with the baseline, although these were also not significant.

7.32 On-site and off-site amenity spaces, including seating areas, parks and public squares, were generally suitable for sitting and/or standing during summer conditions. While a small number of locations remained one comfort category above the target, these reflected baseline conditions or were considered appropriate for their intended use, resulting in not significant impacts.

7.33 No locations exceeded the strong wind safety criterion, and the cumulative assessment concluded that the proposed development, together with the cumulative scheme, would not give rise to any significant wind microclimate effects.

Mitigation and Management

7.34 The ESA wind assessment included additional sensitive receptors and updated mitigation measures, including specific tree planting to improve wind conditions. Specifically:

- A 1200 mm by 2000 mm, 30% porous screen at the southeastern corner of the Site boundary; and
- Five trees (two 8 m tall and three 10m tall) between the Apex Tower and the Clerkenwell Building.

7.35 The mitigation measures implemented in Assessment Scenario 3 meant areas previously affected by strong winds were no longer so, including locations on the pavement to the south-east of the site and between the Apex Tower and Clerkenwell Building. As a result, all residual wind impacts were assessed as neutral and not significant.

Non-Technical Summary

7.36 The NTS in Appendix 8.1A Key Legislation, Policy and Guidance.pdf correctly reflects the assessments provided in the ESA and provides an appropriate summary level of detail based on the assessments.

Table 7.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
WM1	Paragraph 8.27 of the ESA states there are five assessment scenarios, but only four are presented and considered. The Applicant should confirm if this is a typo or if one scenario has been omitted and needs to be corrected.
WM2	The correction factors for wind directions should match the 10° and 30° wind direction angles used in the assessment scenarios, as referenced in Paragraph 8.8.
WM3	At present, it is quite difficult to differentiate between the different wind speed regimes with the current colour scheme employed. This should be updated to better differentiate the different regimes.
WM4	The scale of wind effects when wind conditions are calmer than required have been removed in Paragraph 8.35 of ESA, the Applicant should clarify why.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 8
Review of Chapter 9: Cumulative Effects

Scope of EIA

8.1 Chapter 9: Cumulative Effects provides a summary of the cumulative effects. This Chapter addresses the in-combination effects from interactions of individual effects and as well as the cumulative effects combined with other planned schemes associated with the Proposed Development. The 'intra' and 'inter' cumulative effects have therefore been considered.

Baseline

8.2 The baseline for each of the topics has been assessed in the relevant technical chapters (Chapters 6-8) of the ESA.

Assessment

8.3 Although there is no established methodology for assessing the nature and scale of effect interactions on a receptor, guidance has been provided by the European Commission (EC) to assist with the approach to the assessment. The Applicant uses this guidance to determine the cumulative effects. This is considered an appropriate approach and best practice.

8.4 The methodology covers the operational and construction phase for both the intra and inter cumulative effects. The inter-project effects criteria focused on 2km for TVIA and 0.4km for Wind and the justification used to identify the cumulative schemes is considered acceptable. Additionally, the stages used to undertake the assessment of intra-project effects is considered an acceptable approach.

8.5 The Waterman review highlighted that the three cumulative schemes identified should be shown on a figure and be presented with their descriptions. This has been appropriately updated in the ESA, as shown in Figure 9.1A and the descriptions of the schemes has been included. The Applicant has also updated the heritage text in paragraph 9.24-9.29 to include the omissions mentioned in the Waterman review. This is considered acceptable.

8.6 However, the Applicant has not provided information on whether there have been any updates to cumulative schemes list since the 2024 assessment. It is assumed there have not been any updates, but the Applicant should clarify this (**CE1**).

Secondary, Cumulative and Combined Impacts

8.7 The Applicant sets out the inter-project effects by each scoped in topic and highlights the information on cumulative effects already stated in the technical topic chapters (Chapters 6-8). This is considered acceptable.

8.8 The Applicant states the intra cumulative construction and operational effects expected as a result of the Proposed Development. The conclusions of these effects are considered acceptable.

Mitigation and Management

8.9 A summary of the management and mitigation measures are provided in Chapter 10: Conclusions of the ESA.

Non-Technical Summary

8.10 The NTS is sufficient for a member of the public to understand. However, there is no summary of the cumulative effects or an explicit statement referring to the significant cumulative effects found as they are not stated in the NTS. For example, in Table 9.2A of the ESA it states there is expected to be a Moderate/ Beneficial effect on the visual receptor of Residents, which is significant, but this has not been stated in terms of a cumulative effect in the NTS. The applicant should ensure all information on significant cumulative effects is included in the NTS (**CE2**).

Table 8.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
CE1	The Applicant should clarify whether there have been any updates to the cumulative schemes list since the 2024 assessment.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
CE2	The Applicant should ensure all information on significant cumulative effects is included in the NTS.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 9
Review of Chapter 10: Conclusions

Scope of EIA

9.1 Chapter 10: Conclusions summarises the background information of the EIA process and the main findings of the ESA related to the scoped-in topics.

9.2 A section is included on the mitigation measures and residual effects proposed as a result of the assessment process for each environmental aspect considered. The residual effects in respect of construction and operational phases have been accounted for and the embedded and additionally mitigation measures have been included.

Baseline

9.1 The baseline conditions for each of the topics have been assessed in the relevant technical chapters (Chapters 6-8).

Assessment

9.2 A summary of the residual effects has been clearly displayed in Table 10.1A. The table includes the significance of effect and the residual effect along with mitigation measures proposed and the mechanism of control and delivery. Although, it is noted, the Applicant has not indicated in Table 10.1A whether the residual effects are during the construction or operational phases of the Proposed Development. This would have been useful information for the reader when viewing the table.

9.1 The measures proposed for mitigation, management and monitoring are to be secured through a planning condition or legal agreement if granted planning permission by LBI. This is considered acceptable.

Secondary, Cumulative and Combined Impacts

9.2 The cumulative effects are summarised in Chapter 9: Cumulative Effects and in the relevant technical topic chapters (Chapters 6-8).

Mitigation and Management

9.3 The mitigation measures proposed are primarily embedded in the design with some additional measures

included for Wind Microclimate effects, such as landscaping and a wind mitigation screen. The mitigation measures are also discussed within the main chapter text. Updates to mitigation measures since the 2024 ES have been clearly shown in blue text.

Non-Technical Summary

9.4 The NTS provides sufficient information in non-specialist language for this chapter and highlights the findings of the assessment well in table format against the technical topic and residual effect.

Table 9.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
N/A	None.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 10
Review of Scoped Out Topic: Daylight and Sunlight

Scope of EIA

10.1 Daylight, Sunlight and Overshadowing have been scoped out of the EIA. As a result, DPR have reviewed the standalone internal and neighbouring daylight and sunlight reports submitted as part of the planning application.

10.2 The justification for scoping out daylight, sunlight and overshadowing is that it is considered that the daylight and sunlight reductions are modest and where they are noticeable, they are considered to be commensurate with an urban environment. This statement appears reasonable as the Proposed Development does not seem to cause any moderate to high adverse reductions.

10.3 The reports accompanying the ESA assess the significance of potential effects on daylight and sunlight to surrounding residential buildings and overshadowing to the surrounding area including relevant amenity spaces. The internal report tested the potential daylight and sunlight levels to the proposed dwellings and amenity areas.

10.4 The scope accords with the guidance in BRE Report 209, 'Site Layout Planning for Daylight and Sunlight - A guide to good practice' (third edition, 2022) ('the BRE guide') and is acceptable.

10.5 The locations of the receptors are clearly shown in the main body of the neighbouring daylight and sunlight report. The appendices contain window location drawings showing the exact location of the neighbouring windows tested.

10.6 The neighbouring daylight and sunlight report tests the difference between the existing baseline and proposed condition.

10.7 The scope is considered appropriate, both on terms of physical extent of the local environment and topics considered.

Assessment - Neighbouring

Methodology and significance criteria – surrounding receptors

10.8 The correct BRE assessment methodology has been used to quantify the difference between the existing and proposed condition. These are:

- Daylight (Vertical Sky Component (VSC) and No Sky Line (NSL)) and Sunlight (Annual Probable Sunlight Hours (APSH)) to relevant neighbouring buildings;
- Sunlight (two-hours sun-on-ground contour) to neighbouring amenity spaces.

10.9 The assessment notes that research was undertaken to obtain floor plans of the neighbouring properties, so that room uses could be identified and room layouts adopted, which is relevant to NSL testing. The properties where plans have been used is explained in the neighbouring daylight and sunlight report. In other properties, room layouts have been assumed. This is considered an acceptable approach. Arguably, less weight should be applied to NSL results for rooms whose layouts have been assumed, as they may be less accurate.

10.10 Paragraph 3.4 mentions a third daylight assessment measure which is the Average Daylight Factor (ADF). This assessment method was removed from the BRE guidelines in 2022; therefore, this reference should be removed from the neighbouring daylight and sunlight report. It is noted that the ADF method has not been used for the neighbouring impact assessment. **(DSO1)**

10.11 The neighbouring daylight and sunlight report lists the source information used in the assessment and the properties which have been based on floor plans are clearly shown.

10.12 The neighbouring daylight and sunlight report states that a photogrammetric model was used for the surrounding context but does not state whether survey information was used to construct the neighbouring windows. Although, the 3D model is expected to be suitably accurate, this should be clarified **(DSO2)**.

10.13 When considering the VSC impacts to windows located under balconies and protruding obstruction. Supplementary without balcony assessment has been undertaken. This approach is appropriate.

10.14 The neighbouring daylight and sunlight report states that in an urban context a flexible approach to the BRE recommendations should be applied. This follows national, regional and local planning policy as well as several planning appeal decisions. Paragraph 5.18 states that while a general VSC target of 15% is commensurate with the context, it must be accepted that there will be a minority of windows which fall below this target. If this is considered a dense urban area than using the approach documented in the neighbouring daylight and sunlight report is considered acceptable. Several of the surrounding properties are low rise and there have been planning appeal decisions which have suggested a higher VSC level near 20% is appropriate in more suburban areas.

Assessment Findings – surrounding receptors

10.15 The neighbouring daylight and sunlight report describes the significance of in VSC and NSL terms for each neighbouring property is described in the report and appears to be correctly stated.

10.16 The significance of effect and impacts in APSH terms for each neighbouring property tested appears to be correctly stated.

10.17 The overshadowing significance of effects on the neighbouring amenity areas are correctly stated.

10.18 The neighbouring daylight and sunlight report concludes that generally the daylight and sunlight effect are modest for a scheme in an urban environment. This state is considered reasonable.

Assessment - Internal

Methodology and significance criteria – internal

10.19 The internal daylight, sunlight and overshadowing report has considered an appropriate number of rooms and amenity areas within the Proposed Development. Therefore, the scope is considered acceptable.

10.20 The daylight illuminance method has been used to assess the internal lux levels within the Proposed Development, including the historic blocks.

10.21 Paragraph 4.3 states that for the multi-use rooms containing a kitchen, 150 lux rather than the strict 200 lux is considered appropriate. This more flexible approach to the BRE guidelines is considered acceptable.

10.22 The internal daylight, sunlight and overshadowing report does not list the parameters used for the assessment. The parameters used have a large bearing on the accuracy of the results and therefore the glazing transmittance, maintenance factor, frame and glazing bar factor and external and internal reflectance values should be clarified (DS03).

10.23 The sunlight exposure method has been used to test the direct sunlight levels within the proposed habitable rooms.

10.24 The two-hours sun-on-ground method has been used to test the direct sunlight levels to the Proposed Development amenity areas.

Assessment Findings – Proposed Development

10.25 The internal daylight and sunlight results are described in the report and the results clearly presented in the relevant appendices.

10.26 The two-hour sun-on-ground results are described in the report and clearly presented in the relevant appendices. The applicant has tested the amenity spaces on 21 March (Spring Equinox) as recommended in the BRE guide, and on 21 June (Summer Equinox).

10.27 The conclusions are considered to correctly state the level of adherence to the BRE guidelines. The only caveat would be that for the Clerkenwell building only 48% of the rooms satisfy the BRE guidelines, which is generally considered low. It is noted that this is an historic building and therefore the aperture sizes cannot be manipulated to improve the daylight levels.

Secondary, Cumulative and Combined Impacts

10.28 There does not appear to be any nearby future development which have the potential to impact the daylight, sunlight and overshadowing results reported.

Mitigation and Management

10.29 No technical analysis of the likely significant effects on the neighbouring properties and amenity spaces during the demolition and construction phases were carried out. This is considered acceptable.

10.30 Given the extent of the daylight, sunlight and overshadowing infringements a mitigation section is not required.

Non-Technical Summary

10.31 As daylight, sunlight and overshadowing has been scoped out of the EIA. These subjects are not mentioned in the NTS which is considered reasonable.

Table 10.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
DSO1	Remove reference to the ADF assessment method as this test is no longer recommended in the BRE guide.
DSO2	Further information should be provided outlining how the neighbouring windows were constructed and positioned in the 3D model
DSO3	Clarify the parameters used for the daylight illuminance assessment
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 11
Review of Scoped Out Topic: Climate Change

Assessment

11.1 The EIA Regulations require consideration of the following:

- Emissions reduction: The potential effects of the Proposed Development on emissions of greenhouse gases (GHGs).
- Climate change adaptation: The vulnerability of the Proposed Development to climate change ('project resilience') and whether the scale of projected climate change identified will fundamentally alter any baseline conditions or effect judgements included elsewhere in the ES ('in combination climate impacts').

11.2 The relevant EIA guidance that requires consideration is as follows:

- ISEP (formerly IEMA) 'Assessing Greenhouse Gas Emissions and Evaluating Their Significance' (version 2 2022 and version 2.1, with supplementary guidance, April 2026, noting that the ESA was prepared prior to this).
- ISEP 'EIA Guide to Climate Change Resilience and Adaptation (2020)'.

11.3 The previous review of the 2024 ES (Waterman, January 2025) highlighted that the topic of climate change was not included in the 2024 ES with no justification provided for this exclusion in Table 2.4: Non-significant environmental topics. Notwithstanding this, the previous review noted that:

- Paragraph 4.30-4.31 stated that the Proposed Development will provide carbon-offset payments to offset the shortfall in regulated CO_2 emissions reduction.
- Table 2.5 stated that the implications of climate change had been considered in each of the topic chapters (6-8), although it was unclear how this had actually been addressed from a review of the topic chapters.

11.4 The ESA includes consideration of climate change in Table 2.4A: Non-significant environmental topics. With respect to emissions reduction, it is stated that a Whole Life Carbon assessment has been prepared to support the application, with key GLA benchmarks achieved. The retention of existing

structures provides carbon savings versus demolition and rebuild, and operational carbon will achieve an 81% improvement over Part L. A carbon offset payment of £94,536 will be secured to achieve net zero carbon. This is a broadly recognised means of addressing residual emissions, provided that all reasonable measures have already been taken to avoid and reduce GHG emissions. On this basis, it is considered acceptable to scope out GHG emissions from further assessment.

11.5 With respect to project resilience to climate change, evidence is provided of appropriate consideration of overheating, flood risk, and water supply/stress. Whilst it would have been helpful to see confirmation that the Applicant has considered the full range of factors identified in chapter 6 of the ISEP/IEMA guidance (2020), including both short-term weather events that produce sudden shocks that can have substantial effects and extremes in longer term climate variability, it is considered acceptable to scope out project resilience from further assessment.

11.6 In Table 2.5A: ES Content Requirements, the previous reference to the consideration of the implications of climate change in 'each of the topic chapters' has been deleted and replaced with a reference to Table 2.4A. However, Table 2.4A makes no reference to 'in combination climate impacts'. Clarification is requested that 'in combination climate impacts' have been considered for the Proposed Development, including for scoped out topics, in accordance with the relevant ISEP/IEMA guidance (2020) (**CC1**).

Table 11.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
CC1	Clarification is requested that 'in combination climate impacts' have been considered for the Proposed Development, including for scoped out topics, in accordance with the relevant ISEP/IEMA guidance (2020)
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 12
Review of Scoped Out Topic: Archaeology

Assessment clarifications and Reg. 25.

12.1 The Applicant states that the archaeological significance of the Site is considered low due to site ground disturbance. It is also noted that archaeological investigations and mitigations have been mentioned to reduce the potential effects to buried heritage assets, if required by local authorities.

12.2 The Applicant has not provided sufficient information to support the view that no significant effects will derive from the Proposed Development to the archaeology.

12.3 As advised by Historic England in the consultation letter of 6/12/2024, the above statement should be supported by consultations responses on the matter from GLAAS (**ARCH1**).

Non-Technical Summary

12.4 For the NTS, the Waterman Review has requested that scoping out archaeology should be further justified. This should be reviewed once consultation responses from GLAAS have been provided (**ARCH2**).

Table 12.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
ARCH2	Once consultation responses have been obtained regarding the effects to the buried heritage, the NTS should be updated accordingly.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
ARCH1	The Applicant has not provided sufficient information to support that no significant effects will derive from the Proposed Development to the archaeology, including consultations responses from GLAAS.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 13
Review of Scoped Out Topic: Socio-Economics

Scope of EIA

13.1 The Waterman Review highlights the inadequate explanation for scoping out social infrastructure given the proposed uplift in floorspace and introduction of residential units of the Proposed Development.

13.2 The updated justification for scoping out socio-economics is covered under the 'Social Infrastructure' section of Table 2.4 of Chapter 2: Methodology of the ESA.

Baseline

13.3 The baseline information of social infrastructure facilities surrounding the Site is provided in terms of healthcare, education and community facilities, which account for the key social infrastructure and is considered acceptable.

Assessment

13.1 Reference to the Health Impact Assessment that accompanies the planning application has been made as part of the justification for scoping social infrastructure out. It assessed the access to health and social care services along with other social infrastructure. This approach is considered acceptable.

Mitigation and Management

13.2 The Applicant proposes a Community Infrastructure Levy to account for the increase of 392 residents requiring healthcare facilities and new community facilities to be provided as part of the Proposed Development. This is considered acceptable to mitigate effects that may have occurred as a result of the Proposed Development.

Conclusion

13.3 It is considered acceptable that social infrastructure is scoped out of the EIA due to the limited effects expected after mitigation is implemented on health, education and community infrastructure.

Table 13.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
N/A	None.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 14
Review of Scoped Out Topic: Major Accidents and Disasters

Scope of EIA

14.1 The Waterman Review states that the 2024 ES does not provide an explanation as to why Major Accidents and Disasters (MAD) have been scoped out of the EIA, although the Waterman Review agrees that there are unlikely to be significant effects as a result of the Proposed Development.

14.2 The updated justification for scoping out MAD is covered under the 'Major Accidents and Disasters' section of Table 2.4 of Chapter 2: Methodology of the ESA.

Assessment

14.3 The Proposed Development is not considered likely to pose significant risks to society and the environment in the event of a major accident or a natural disaster which would impede its usual function. However, the ESA does not refer to relevant ISEP guidance[7] regarding major accidents and disasters in EIA. The London Resilience Partnership (LRP) London Risk Register or the UK National Risk Register are also not accounted for in the ESA. These Registers outline control measures that are considered to minimise the risk of any catastrophic events and it is considered best practice to consider these in scoping assessments. Even though several of the events listed as part of the register are not relevant to the Proposed Development, it is recommended that any potentially remaining relevant events should be managed or altogether avoided through control measures in accordance with the Civil Contingencies Act 2004 and frameworks **(MAD1).**

Mitigation and Management

14.4 The operational phase of the Proposed Development is proposed to be managed through mandatory industry standards and codes. The Applicant should clarify what these industry standards and codes are (**MAD2**).

14.5 The construction phase has been detailed to be managed by implementation of the Construction Design Management Regulations 2015 and a detailed Code of Construction Practice. This will account for the systematic risk

[7] Major Accidents and Disasters in EIA: A Primer (2020), Institute for Environmental Management and Assessment (IEMA), Available at: j27374_iema_major_accidents__disasters_final-1.pdf.

management and mitigation throughout the initial stages of the Proposed Development. This is considered acceptable.

Conclusion

14.6 It is agreed that MAD are unlikely to cause significant effects in relation to the Proposed Development and it is therefore acceptable that this topic is scoped out of the assessment.

Table 14.1: Summary of Review Comments

Ref.	Summary of Clarifications Required from Applicant
MAD1	The Applicant should clarify that the relevant London Resilience Partnership (LRP) London Risk Register or the UK National Risk Register events have been considered and that they should be managed or altogether avoided through control measures in accordance with the Civil Contingencies Act 2004 and frameworks.
MAD2	The Applicant should clarify the relevant industry standards and codes proposed to be used to manage the operational phase of the Proposed Development that relate to MAD.
Ref.	**Summary of Potential Regulation 25 Requests from Applicant**
N/A	None.
Ref.	**Potential Planning Conditions**
N/A	None.

Chapter 15
Assessment of Submitted Regulation 25/Clarification Information

15.1 This section of the FRR considers the responses to the clarifications/potential Regulation 25 information requests identified above and collated in the table below.

Table 15.1: Assessment of Submitted Regulation 25/Clarification Information

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
EIA Context and Influence				
EC1	Clarification	The Applicant should clarify the m AOD of the new Blocks A and C, as mentioned in the Waterman Review.	The mAOD figures have been added to Chapter 4 of the Main ES Addendum Document in the Second ES Addendum (see paragraphs 4.10 and4 4.14). They have also been added to the NTS at paragraphs 4.8 and 4.12.	**Acceptable** The client has provided the relevant mAOD figures in the main body of the ES and the NTS. This is considered acceptable. No further clarification required.
EC2	Clarification	The Applicant should clarify the expected control measures associated with the construction and demolition phases of the Proposed Development.	A standalone CEMP framework document has not been prepared, and it is respectfully considered that one is not required at this stage. The EIA Regulations require the ES to describe the measures envisaged to avoid, prevent or reduce significant adverse effects. The ES Addendum does this: the environmental control measures expected to apply during the demolition and construction phases are described in the ES Addendum, including site establishment, hoarding and wheel washing controls phasing and demolition; waste management measures to be delivered through a Site Waste Management Plan; construction noise and vibration; tree and root protection in accordance with the Arboricultural Method Statement; and logistics mitigation including solid 2.4m hoarding and a Construction Logistics Plan. When considering the points above, no additional amendments have been made as part of the Second ES Addendum.	**Acceptable** The Applicant has clarified that the control measures are included in the technical topic chapters of the ESA. Whilst a framework CEMP would have provided a useful, consolidated summary of these measures, the environmental control measures relied upon within the assessment have been identified and should be secured through the preparation and approval of a detailed CEMP by planning condition. No further clarification required.
Cultural Heritage				
CH01	Clarification	The Applicant should update the Table A6.3.2 with references to the latest NPPF.	An updated Appendix 6.3 has been prepared to reflect the 2026 NPPF (this is now Appendix 6.3AA submitted with the Second ES Addendum).	**Acceptable** No further clarification is required.
CH02	Clarification	The Applicant should consider all designated heritage assets to be of at least high importance/value and should only assign a lower level where this is justified by the assessment, with a clear explanation provided. Thus	The methodology has been used and accepted on multiple other applications, including recent decisions relating to Earl's Court, Bromley by-Bow Gasworks, and West Ealing John Lewis (which was tested at appeal).	**Acceptable** No further clarification is required.

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
		the Applicant should modify the methodology accordingly.	The approach provides a necessary distinction between heritage assets of differing significance within the same designation category.	
CH03	Clarification	The design and benefits should be considered as part of the impact only if relevant to the contribution of the changes to the significance of the heritage assets. Otherwise, they refer to mitigation or offsetting elements and should be wholly separated from the assessment phase. The Applicant should clarify this distinction in the methodology.	This is a detailed application, and the design of the proposals and the benefits they deliver are material considerations in the assessment of heritage impact. The assessment should therefore take into account both the beneficial and any harmful aspects of the Proposed Development when determining its overall effect on the significance of the heritage asset.	**Acceptable** No further clarification is required.
CH06	Clarification	In paragraph 6.514, the Applicant should clarify what part of the 1 Junction Road Locally Listed Building's significance will benefit from the Proposed Development.	Paragraph 6.138 describes the significance of this non designated heritage asset as follows: "The significance of the building is derived from its design value, strong individual character, and the contribution it makes to the street. It is noted as a good representative of the period." The introduction of a high-quality new development within the setting and visual context of the asset has the potential to enhance its surroundings, reinforcing the appreciation of its architectural qualities and contribution to the streetscape. As a result, the Proposed Development would make a positive contribution to the asset's setting and, in turn, support the appreciation of its significance.	**Acceptable** No further clarification is required.
CH07	Clarification	In paragraph 6.585, the Applicant should clarify what part of the setting of Highgate Village will change due to the Proposed Development to explain the conclusion reached.	Paragraphs 6.239 – 6.241 consider the setting of the Conservation Area. Paragraph 6.239 states, in part: 'Owing to the topography of Highgate, in places there are views south over the central London, contributing to an understanding of how the area developed as a suburb to the city...' Paragraph 6.240 further states: '…Highgate occupies an elevated hilltop position, such that there are glimpsed views of the City and central London.' The Proposed Development would introduce additional built form into some peripheral views from the Conservation Area and would therefore result in a change to aspects of its wider setting. Specifically, the views out from Waterlow Park would have a slight urbanising effect on the setting of this part of the Conservation Area. We have altered our conclusion in	**Acceptable** No further clarification is required.

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
			relation to this heritage receptor to a Minor/Moderate Adverse and not significant effect.	
CH04	Potential Reg. 25	The methodology allows combinations of effects expressed as minor/moderate neutral, making difficult to understand if significant effects arise from the Proposed Development. This is the case with the Church of St Joseph, in paragraph 6.539, the conclusions for which should be clarified.	Table 6.7A defines a neutral effect as: 'An effect that on balance, is neither beneficial nor adverse to a receptor, and therefore preserves the receptor'. The Church of St Joseph is shown in View 13. The church will principally be experienced in views orientated towards the building itself, with attention focused on its distinctive historic form and architectural qualities. Although elements of the Proposed Development will be visible within the backdrop of some views, they will not detract from the experience of the church or affect the ability of receptors to appreciate its significance as a listed building. The Proposed Development will therefore preserve the significance of the Church of St Joseph and result in a neutral effect. For the avoidance of doubt, no significant effect on this heritage receptor will arise.	**Acceptable** No further clarification is required. This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations.
CH05	Potential Reg. 25	Professional judgment is at times used to reached effects conclusions without explanation or in contradiction with the methodology, such as in the case of Highgate Cemetery, in paragraph 6.459. The methodology used and conclusions reached for all assets, including Highgate Cemetery, should be further checked, and the results amended if inconsistencies are identified.	In response to this comment, we have reviewed both the Cultural Heritage and Townscape and Visual chapters of the ES and made updates. Professional judgement has been applied throughout the assessment process when reaching conclusions on effects. Within the Cultural Heritage chapter, the principal changes relate to revising certain effects from Adverse to Neutral where, on review, the assessment identified no overall harm to the significance of the heritage receptor. Professional judgement remains an integral part of the assessment process, but the assessment has been reviewed in light of this comment and that a number of revisions have been made to improve consistency with the methodology.	**Acceptable** No further clarification is required.
Townscape and Visual				
TVIA1	Clarification	The Applicant should clarify whether any methodology or significance criteria have changed since the 2024 ES, and if so what has changed.	There have been no changes.	**Acceptable** The Applicant has confirmed there has been no change to the methodology. No further clarification is required.

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
TVIA2	Clarification	The general mass of the Proposed Development appears to be the same as the submitted scheme. The Applicant should confirm which aspects of the design changes affect the TVIA.	Montagu Evans has also prepared an Addendum Heritage Statement which explains that the changes pertinent to this assessment are updates to the bulk, massing and elevations to Block A, an affordable housing block facing on to Highgate Hill.	**Acceptable** The Applicant has clarified that the changes relate to the bulk, massing and elevations to Block A only (length of block increased ~1.5m but the length of the 7 storey volume has been reduced ~3.5m, façade detailing changes). No further clarification is required.
TVIA3	Clarification	A 'Visualisation Pack' has been included as Appendix 6.2A. A number of views show the 'original submission' with a few select views showing the 'revised submission'. The Applicant should explain the reasoning for why not all the views show the revised submission.	Montagu Evans has also prepared an Addendum Heritage Statement which explains that only those views that may be affected by the scheme changes (Views 1, 20, 21, 22, which show the proposed affordable blocks) were updated in consultation with the visualisation consultant Cityscape.	**Acceptable** The Applicant has confirmed that only Views 1, 20, 21 and 22 show the change. No further clarification is required.
TVIA4	Clarification	The Proposed Development is shown in View 10A (LV5a), View 10B (LV5b), View 20 (Macdonald Road / Highgate Hill) and View 21 (Magdala Avenue / Highgate Hill) but these do not look any different from the submitted scheme – the Applicant should clarify if there is any difference in these views and why these have been selected to show the revised submission.	Views 20 and 21 were updated because they show the proposed affordable blocks. The updates to View 10A and 10B comprise the addition of a horizontal red line denoting the St Paul's threshold height as specified in the 2023 local plan SPD.	**Acceptable** The Applicant has clarified the differences in views which are minor. No further clarification is required.
TVIA5	Clarification	The Applicant should clarify what the red line in View 10B represents.	See response to TVIA 4 above.	**Acceptable** The Applicant has clarified that the red line in view 10B denotes the St Paul's threshold height as specified in the 2023 local plan SPD. No further clarification is required.
Wind Microclimate				
WM1	Clarification	Paragraph 8.27 of the ESA states there are five assessment scenarios, but only four are presented and considered. The Applicant should confirm if this is a typo or if one scenario has been omitted and needs to be corrected.	This was a typo and has been corrected.	**Acceptable** The Applicant's response is acceptable as the typo has been confirmed and subsequently corrected. No further clarification is required.
WM2	Clarification	The correction factors for wind directions should match the 10° and 30° wind direction angles used in the assessment scenarios, as referenced in Paragraph 8.8.	This has been updated at Table 8.3AA of the Second ES Addendum.	**Acceptable** The Applicant's response is acceptable as the table has been corrected with 30° wind direction angles and

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
				corresponding correction factors. No further clarification is required.
WM3	Clarification	At present, it is quite difficult to differentiate between the different wind speed regimes with the current colour scheme employed. This should be updated to better differentiate the different regimes.	This has been addressed at Figure 8.1AA of the Second ES Addendum.	**Acceptable** The Applicant's response is acceptable as the figure has been updated with a colour scheme which clearly differentiates the different wind speed regimes. No further clarification is required.
WM4	Clarification	The scale of wind effects when wind conditions are calmer than required have been removed in Paragraph 8.35 of ESA, the Applicant should clarify why.	This is due to the fact that wind conditions being calmer than needed is not a noticeable benefit to pedestrians or cyclists (i.e. conditions are "comfortable" either way).	**Acceptable** The Applicant's response is acceptable as conditions which meet their criteria do not pose a risk to pedestrian comfort and are "comfortable" either way as the applicant rightly states. No further clarification is required.
Cumulative Effects				
CE1	Clarification	The Applicant should clarify whether there have been any updates to the cumulative schemes list since the 2024 assessment.	A review of the cumulative schemes has been undertaken as part of the preparation of this Second ES Addendum, applying the same screening criteria as the 2024 ES. No additional schemes meeting those criteria have been identified, and the cumulative schemes list therefore remains as agreed with LBI. Text has been added to Chapter 9 of the Second ES Addendum to confirm this position (see paragraph 9.12).	**Acceptable** The Applicant has confirmed no new cumulative schemes have been identified since the 2024 assessment. No further clarification is required.
CE2	Potential Reg. 25	The Applicant should ensure all information on significant cumulative effects is included in the NTS.	The cumulative assessment concluded that the effects in the cumulative scenario are the same as those in the operational scenario. No additional or different significant effects arise from the Proposed Development in combination with the cumulative schemes. Text has been added to Section 7 of the NTS reporting the significant effects identified in the cumulative scenario, including the Moderate Beneficial effect on residents.	**Acceptable** The Applicant has reflected the significant cumulative effects identified in the assessment. No further clarification is required.
Daylight, Sunlight and Overshadowing				
DSO1	Clarification	Remove reference to the ADF assessment method as this test is no longer recommended in the BRE guide.	See Planning Report	**Further Clarification Required**

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
DSO2	Clarification	Further information should be provided outlining how the neighbouring windows were constructed and positioned in the 3D model	See Planning Report	GLA should satisfy themselves that they are happy to resolve the outstanding query in relation to DSO with the Applicant as noted in the email dated 30 September 2026.
DSO3	Clarification	Clarify the parameters used for the daylight illuminance assessment	See Planning Report	
Climate Change				
CC1	Clarification	Clarification is requested that 'in combination climate impacts' have been considered for the Proposed Development, including for scoped out topics, in accordance with the relevant ISEP/IEMA guidance (2020)	Text has been added to Table 2.4AA of the Second ES Addendum to clarify this.	**Acceptable** No further clarification is required.
Archaeology				
ARCH1	Potential Reg. 25	The Applicant has not provided sufficient information to support that no significant effects will derive from the Proposed Development to the archaeology, including consultations responses from GLAAS.	Text has been added at paragraph 6.4 of the NTS to clarify this.	**Acceptable** No further clarification is required. This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations
ARCH2	Clarification	Once consultation responses have been obtained regarding the effects to the buried heritage, the NTS should be updated accordingly	Text has been added to Table 2.4AA of the Second ES Addendum to clarify this.	**Acceptable** No further clarification is required.
Major Accidents and Disasters				
MAD1	Clarification	The Applicant should clarify that the relevant London Resilience Partnership (LRP) London Risk Register or the UK National Risk Register events have been considered and that they should be managed or altogether avoided through control measures in accordance with the Civil Contingencies Act 2004 and frameworks.	Text has been added to Table 2.4AA of the Second ES Addendum to clarify this.	**Acceptable** The Applicant has demonstrated consideration of the relevant frameworks. No further clarification is required.

Code	Request Type	Original Request	Applicant Response	Reassessment Conclusion
MAD2	Clarification	The Applicant should clarify the relevant industry standards and codes proposed to be used to manage the operational phase of the Proposed Development that relate to MAD.	Text has been added to Table 2.4AA of the Second ES Addendum to clarify this.	**Acceptable** The Applicant has clarified the industry standards and codes. No further clarification is required.

Appendix A

Evidence of Reviewer Competency

A.1 Details of the expertise of each of the team members involved in the review are set out in the table below.

Table A.1: Reviewer Competency

Reviewer	Topic/Responsibility	Professional Qualifications	Years of Experience
Helen Kent Director of Environmental Planning LUC	EIA Project Director	BA(Hons) Geography MSc Land Resource Management PGDip Town & Regional Planning MRTPI, MISEP, Chartered Environmentalist	25+
Ife Asiyanbi Senior Consultant LUC	EIA Project Manager	BSc (Hons) Geology and Mineral Sciences MSc Environmental Assessment and Management PISEP	4+
Emily Westcott	Assistant Project Manager and Other Issues	BSc (Hons) Geography MSc Environmental Modelling Monitoring and Reconstruction GradISEP	1+
Rebecca Knight LUC	Townscape Visual Impact Assessment	BSc (Hons) Biology, Diploma in Landscape Architecture, MA Landscape Design, CMLI, FLI	25+
Joanna Wright LUC	Climate Change	MA (Hons) Geography MSc Environmental Impact Assessment MSc Carbon Management FISEP	33
Rachel Haworth LUC	Built Heritage and Archaeology	Full member of Institute of Historic Building Conservation (IHBC) MA Conservation Studies MA (Hons) Architectural History	24
Chris Harris	Daylight, Sunlight and Overshadowing	BSc (Hons)	20+

Reviewer	Topic/Responsibility	Professional Qualifications	Years of Experience
DPR			
Dr Josh Walton Xi Engineering	Wind Microclimate	BSc Hons Mathematics and Physics PhD Mathematics Membership of the IOA (application in progress)	5