



Waterlow Park Trust

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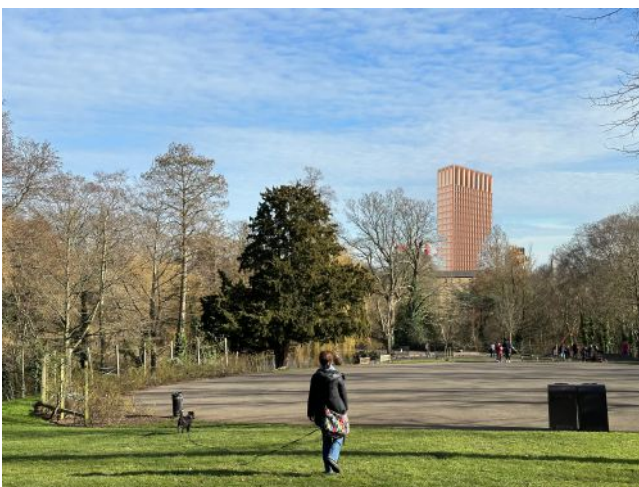
20 June 2023

Re Archway Campus development

I am writing to you in my capacity of Chair of the Waterlow Park Trust Advisory Group. We are a group constituted at the behest of Camden Council who are both Trustee and managers of Waterlow Park. The role of the Advisory Group is to provide input on governance, policy and operational oversight in Waterlow Park on behalf of the Trust. Waterlow Park is the largest Council run park in Camden. At its nearest point it is only 280 meters from the Archway Campus site and just over 400 meters from the proposed tower.

We are extremely concerned about the negative impact on the park and wider area of current proposals for the Archway Campus site. The primary concern is the plan for a tall tower-block for student accommodation, which at approaching double the height of the existing Archway Tower would dramatically change the relationship of the park to the surrounding built environment and to London as a whole.

Highgate Hill is part of the range of the 'Northern Heights' of London and at its peak reaches 136 meters by the Gatehouse public house. This is the second highest point in this range of hills, only 1 meter less than a point near Spaniards Inn. The elevation of Highgate and Waterlow Park on its upper slopes is such that people consider visits to the park to be an 'escape' from London to a place which rises above the city skyline, whilst offering distant views of the city and tall buildings such as the shard beyond its leafy perimeter. The nearest tall building is the existing 17 storey Archway Tower ('Vantage Point') above Archway underground station. At 59 meters it is just visible behind the tree line from Waterlow Park; at times the top of the tower coming roughly level with the upper canopy of the trees. This is quite different to the proposed Archway Campus tower which at approaching 100 meters (following a recent reduction in the number of floors proposed) would rise substantially above the tree line and therefore impinge on park visitors experience to a very significant extent.



Views across the park from two positions around 700 meters from the proposed tower give an impression of the change to the skyline that any development of this scale would have.* We estimate that the tower will rise some 60 meters above these positions. Inevitably with such a new structure the relationship of Park to built environment would be radically altered. Instead of the distance from the park to taller buildings of London being such that there is still a real sense of being 'above' the city, the relationship would change to becoming a 'city centre' park 'beneath' the built environment of London. Waterlow Park would be dominated by the tower, overlooked for the first time ever from the south.



Topography of Highgate Hill showing Waterlow Park with illustrated viewpoints of Archway Campus tower which would reach about 160m (about 25 meters above the highest point in Highgate)

Waterlow Park is Grade II* listed with Historic England. The listing notes that “In 1907 Evelyn Cecil described Waterlow Park as 'undoubtedly the most beautiful of all the parks [of London]' and it was **renowned for its magnificent views**. The park is well preserved and still has fine views.” In describing the park today the listing continues; “There are good views from the higher ground southwards towards central London and the City.” (see <https://historicengland.org.uk/listing/the-list/list-entry/1000849?section=official-list-entry>)

Waterlow Park is also within Camden’s Highgate conservation area. The Conservation Area Appraisal defines the character of Highgate on P47 under the heading “Key views, vistas and approaches” as follows: “Due to the elevated position of Highgate Village there are many glimpses of distant views. An essential part of the character of Highgate Conservation Area is the open aspect. **From Waterlow Park there is a panorama reaching across from the City to the Royal Free Hospital in Hampstead.**” (see <https://www.camden.gov.uk/documents/20142/7610500/Highgate.pdf/6995d361-b1c5-5650-4414-9669232073e1>)

Indeed from the date the park was gifted to the people of London as a ‘garden for the garden-less’ by Sir Sydney Waterlow in 1889 the exceptional views from an elevated position above London have been noted as an essential characteristic of the park: “The land slopes down from the top of Highgate Hill. From its turfy undulations one can look right over the top of the cross on St Paul’s Cathedral, and in bright weather can see the glitter of Crystal Palace. Halfway down the slope is an old sundial. Overgrown with moss, on whose top is recorded the fact that this stone is on a level with the top of St Paul’s. **An extensive view is thus among the delights of this new public acquisition.**” From the Illustrated London News Nov 30 1889 - 693 (see <https://waterlowparktrust.org.uk/wp-content/uploads/2016/11/ILN-nov30-1889m.pdf>)

Whilst writing to express our particular concern regarding the negative impact of the proposed tower on Waterlow Park and the public enjoyment of the space, we should also note that we believe there are numerous sight-lines which will be negatively impacted (such as that down Highgate Hill itself). The nature of the current proposals for the Archway Campus site at the immediate foot of a hill from which residents and visitors naturally expect distant views, do not take account of topography. The Archway Campus site is wholly unsuited to a development on this vertical scale.

We would also note that the development appears to run counter to Islington's own position on tall buildings which suggests any clustering around the existing Archway tower should be on the same urban 'island' and not extend to the Archway Campus site. Notably under section 6.5.5 it states "Potential new tall buildings could expand the existing cluster of taller buildings to the west of Archway Tower. **New tall buildings of lower height** and greater architectural quality will enhance the visual appearance of the Archway cluster, as well as **mitigate the impact of the bulky Archway Tower on the skyline.**" This clearly stands against any proposal for a much taller building on the Archway Campus site to the north. The Islington tall building study also mentions a key view looking up Highgate Hill toward "the prominent patina coloured dome of Saint Joseph's RC Church". Again with a development of the vertical scale proposed the dome would lose its prominence. (See <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20212022/20210718islingontallbuildingsstudypart2.pdf>)

We believe that there is a statutory responsibility on developers with proposals that affect the setting of grade II* registered parks or gardens to formally consult with Historic England. Likewise if proposals affect the "character or appearance" of a conservation area. Given the proximity of the development site to Highgate conservation areas in both Camden and Haringey, along with Historic England's grade II* listing of Waterlow Park would you please confirm that you are consulting with them.

In summary it is our position that the proposed Archway Campus tower is entirely inappropriate and should not be approved. By ignoring the rising elevation of the hill next to the Archway Campus site there is no consideration of how a tall building would dramatically impact the relationship with the built environment of London as seen from Highgate and by visitors to Waterlow Park. The proposal for the tower is insensitive and highly damaging to the character of the area. We trust that the current plans will not proceed and development proposals will be revisited to address the concerns we have expressed.



Ian Henghes
Chair, Waterlow Park Trust Advisory Group

cc Camden Green Spaces, Better Archway Forum, Highgate Society, Islington Society, Highgate Neighbourhood Forum, Dartmouth Park Neighbourhood Forum, Highgate Conservation Area Advisory Committee, Dartmouth Park Conservation Area Advisory Committee, Highgate Cemetery, Historic England, Islington Planning dept, Camden Highgate Ward Councillors, Islington Junction Ward Councillors.

*We would welcome sight at the earliest opportunity of your own impact assessments of views, and trust that the two vantage points we have illustrated above will be represented with a higher degree of accuracy than in these approximations. Please provide methodology and calculations that demonstrate accuracy when preparing such assessments.