

# Islington Local Plan

## Strategic and development management policies

November 2018



Islington Council  
Local Plan: Strategic and Development Management Policies - Regulation 18 draft, November 2018

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<b>1</b>	<b>What is the role of the Local Plan?</b>	<b>1</b>
	Introduction	1
	Islington in context	3
	Vision and objectives	5
	Site appraisal and design process	10
<b>2</b>	<b>Area Spatial Strategies</b>	<b>12</b>
	Policy SP1: Bunhill & Clerkenwell	13
	Policy SP2: King’s Cross and Pentonville Road	15
	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	19
	Policy SP4: Angel and Upper Street	25
	Policy SP5: Nag’s Head and Holloway	29
	Policy SP6: Finsbury Park	33
	Policy SP7: Archway	38
	Policy SP8: Highbury Corner and Lower Holloway	42
<b>3</b>	<b>Thriving Communities</b>	<b>45</b>
	Policy H1: Thriving communities	45
	Policy H2: New and existing conventional housing	49
	Policy H3: Genuinely affordable housing	53
	Policy H4: Delivering high quality housing	60
	Policy H5: Private outdoor space	68
	Policy H6: Purpose-built Student Accommodation	71
	Policy H7: Meeting the needs of vulnerable older people	73
	Policy H8: Self-build and Custom Housebuilding	76
	Policy H9: Supported Housing	78
	Policy H10: Houses in Multiple Occupation (HMOs)	80
	Policy H11: Purpose Built Private Rented Sector development	82
	Policy H12: Gypsy and Traveller Accommodation	84
	Policy SC1: Social and Community Infrastructure	86
	Policy SC2: Play space	89
	Policy SC3: Health Impact Assessment	91
<b>4</b>	<b>Inclusive Economy</b>	<b>93</b>
	Policy B1: Delivering a range of affordable business floorspace	93
	Policy B2: New business floorspace	96
	Policy B3: Existing business floorspace	101
	Policy B4: Affordable workspace	103
	Policy B5: Jobs and training opportunities	106
	Policy R1: Retail, leisure and services, culture and visitor accommodation	107
	Policy R2: Primary Shopping Areas	111
	Policy R3: Islington’s Town Centres	112

Policy R4: Local Shopping Areas.....	120
Policy R5: Dispersed retail and leisure uses.....	124
Policy R6: Maintaining and enhancing Islington’s unique retail character .....	125
Policy R7: Markets and specialist shopping areas .....	127
Policy R8: Location and Concentration of Uses .....	128
Policy R9: Meanwhile/temporary uses.....	131
Policy R10: Culture and the Night Time Economy .....	132
Policy R11: Public Houses.....	136
Policy R12: Visitor accommodation .....	138
<b>5 Green infrastructure.....</b>	<b>142</b>
Policy G1: Green Infrastructure .....	142
Policy G2: Protecting open space.....	144
Policy G3: New public open space .....	147
Policy G4: Biodiversity, landscape design and trees.....	149
Policy G5: Green roofs and vertical greening.....	155
<b>6 Sustainable Design .....</b>	<b>160</b>
Policy S1: Delivering Sustainable Design .....	160
Policy S2: Sustainable Design and Construction .....	163
Policy S3: Sustainable Design Standards.....	164
Policy S4: Minimising greenhouse gas emissions.....	169
Policy S5: Energy Infrastructure .....	175
Policy S6: Managing heat risk .....	180
Policy S7: Improving Air Quality.....	182
Policy S8: Flood Risk Management.....	185
Policy S9: Integrated Water Management and Sustainable Drainage.....	192
Policy S10: Circular Economy and Adaptive Design.....	197
<b>7 Public Realm and Transport.....</b>	<b>200</b>
Policy T1: Enhancing the public realm and sustainable transport .....	200
Policy T2: Sustainable Transport Choices .....	203
Policy T3: Car-free development .....	205
Policy T4: Public realm .....	209
Policy T5: Delivery, servicing and construction .....	211
<b>8 Design and Heritage.....</b>	<b>214</b>
Policy DH1: Fostering innovation while protecting heritage.....	214
Policy DH2: Heritage assets .....	217
Policy DH3: Building heights.....	221
Policy DH4: Basement development .....	227
Policy DH5: Agent-of-change, noise and vibration.....	230
Policy DH6: Advertisements .....	233

Policy DH7: Shopfronts .....	234
Policy DH8: Public art.....	235
<b>9 Strategic infrastructure.....</b>	<b>237</b>
Policy ST1: Infrastructure Planning and Smarter City Approach .....	237
Policy ST2: Waste .....	239
Policy ST3: Telecommunications, communications and utilities equipment .....	240
Policy ST4: Water infrastructure .....	240
<b>10 Appendices .....</b>	<b>242</b>
Appendix 1: Marketing and vacancy criteria .....	242
Appendix 2: Noise and vibration .....	244
Appendix 3: Transport Assessments and Travel Plans.....	253
Appendix 4: Cycle parking standards .....	256

From **20 November 2018 to 14 January 2019**, the council is inviting comments on the Local Plan – Strategic and Development Management Policies Development Plan Document - Regulation 18 draft.

Responses can be submitted:

- In writing to: Planning Policy Team, Freepost RTXU-ETKU-KECB, Planning Policy, Islington Council, Town Hall, Upper Street, London N1 2UD
- By e-mail to: [planningpolicy@islington.gov.uk](mailto:planningpolicy@islington.gov.uk)

The council will take into account any representation made during the consultation process. Where appropriate, please cite evidence to support any comments.

If you wish to discuss the proposals further, please contact Islington Council's Planning Policy Team on 020 7527 2720/6799, or at [planningpolicy@islington.gov.uk](mailto:planningpolicy@islington.gov.uk)

# 1 What is the role of the Local Plan?

## Introduction

- 1.1 The council is the key agent responsible for shaping Islington's future. Everything the council does contributes to making Islington fairer, creating a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life. The Local Plan is integral to achieving these aims. It sets out a range of planning policies to steer development in the borough over the next fifteen years – this includes:
  - spatial policies covering specific areas in the borough;
  - strategic policies which outline the key priorities across a number of policy areas;
  - detailed criteria-based policies, which stem from strategic and spatial requirements and are the main basis on which planning decisions are made; and
  - specific site allocations which provide fine-grain detail on a number of planned and potential development sites across Islington.
- 1.2 The Local Plan provides a clear, bold framework for planning decisions which set out what we expect from development. The Local Plan covers the period 2020 to 2035 (“the plan period”). Islington is a borough with significant constraints, and it is not hyperbole to state that each and every development must make the most of every site and development opportunity, in order to ensure that opportunities for using increasingly scarce resources, including a lack of developable land, are not wasted.
- 1.3 We can only succeed by working with key public and private sector partners such as the police, health service, and local universities as well as with local communities. The Local Plan has been prepared in co-operation with these stakeholders and many others. This co-operation does not stop once the Local Plan is adopted; it is a continuous process, which enables policies to remain effective throughout the lifetime of the plan.
- 1.4 The Local Plan is informed by an extensive evidence base, both technical and non-technical. In preparing the document, this evidence has provided the basis for our approach. Policy requirements at the national and regional level also have direct implications on what the council can and cannot do. Where possible, we have sought to reflect the full range of opinion – from stakeholders, evidence and policy requirements - but it is never possible to identify a single approach with which everyone will agree and which would be found ‘sound’ and compliant with various statutory requirements set out in planning legislation.

## The planning framework

- 1.5 The Local Plan is developed within a complex planning framework, at the heart of which is primary legislation which sets out the basic legal parameters within which the Local Plan should be prepared and subsequently operate. The Planning and Compulsory Purchase Act 2004 (“The PCPA”) provides the fundamental basis on which the plan-led system functions. It sets out the definition of Local Development

Documents, a suite of documents which must (taken as a whole) set out the authority's policies (however expressed) relating to the development and use of land in their area. This includes documents which have Development Plan status as well as those which do not, such as Supplementary Planning Documents and the Statement of Community Involvement.

- 1.6 The Development Plan is the key set of documents which inform decisions on planning applications. In Islington, the Development Plan consists of any locally adopted Development Plan Documents (such as the Local Plan) and the London Plan (the Spatial Development Strategy prepared by the Mayor of London). The PCPA specifies that planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. What does and does not constitute a material consideration is determined on a case-by-case basis, as is the weight to be given to any such considerations.
- 1.7 Secondary legislation provides further detail on the operation of primary legislation. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) sets out the process for preparing and adopting a Local Plan. It also requires Local Planning Authorities to review Local Development Documents - such as the Local Plan –every five years from the date of adoption. A review does not mean that policies will definitely need to change – it merely requires an objective assessment of policies to determine whether they need updating. Where the review concludes that updates are not necessary, the Local Planning Authority must publish the reasons why.
- 1.8 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they should be applied. It provides a framework within which locally-prepared plans addressing housing needs and other economic, social and environmental priorities can be produced. The NPPF must be taken into account in preparing the development plan; it is also a material consideration in planning decisions, although the weight attributed to the NPPF will depend on the details of each application. Planning Practice Guidance (PPG) provides further detail on policies in the NPPF.
- 1.9 The London Plan is the Spatial Development Strategy for Greater London. It is a strategic plan for London which sets out a policy framework covering a variety of economic, social and environmental issues. It is part of the Development Plan, meaning it must be taken into account in the determination of planning applications. For plan-making, the London Plan provides the strategic, London-wide policy context for all borough Local Development Documents; all such documents including the Local Plan have to be 'in general conformity' with the London Plan.
- 1.10 This iteration of Islington's Local Plan is made up of four Development Plan Documents:
  - Local Plan: Strategic and Development Management policies – the principal document in the Local Plan, which sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.
  - Site Allocations – this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
  - Bunhill and Clerkenwell Area Action Plan (AAP) – a plan for the south of the borough where significant change is expected to occur. The plan sets out spatial policies covering different parts of the area with further policies to manage development.



- North London Waste Plan - a joint waste plan together with six other boroughs within the North London Waste Authority area (Camden, Haringey, Hackney, Barnet, Enfield and Waltham Forest). The Waste Plan will identify a range of suitable sites for the management of all North London's waste up to 2031 and will include policies and guidelines for determining planning applications for waste developments.

1.11 There are a number of Supplementary Planning Documents (SPDs) which provide further guidance on Local Plan policies. The Policies Map visualises the various designations identified in the Local Plan. Implementation of the Local Plan will be monitored through the Authorities Monitoring Report.

**Figure 1.1: Islington Planning Framework**



## Islington in context

- 1.12 Islington is affected – directly and indirectly – by changes at the London level, and beyond. Islington is part of Inner London; it borders the Inner London boroughs of the City of London, Camden, Hackney to the south, west and east respectively, and the Outer London borough of Haringey to the north. It is both a gateway to the commercial heart of the city and to the suburbs, and the varied character of the borough reflects this.
- 1.13 Islington as a place is both small and incredibly diverse. The borough is less than six square miles in size, making it one of the smallest local authorities in the country (by area). There have been significant population increases in recent years, with projections showing further steep increases.
- 1.14 Islington's diversity is reflected in its people. We have a broad multi-ethnic population from a variety of backgrounds, a variety of faith communities, a significant proportion of disabled people, as well as one of the most concentrated LGBTQI+ populations in the

U.K. Islington is an inclusive place for all where diversity is celebrated, and ensuring that this continues is one of the key objectives of the Local Plan.

- 1.15 The challenges facing the borough are considerable. Fundamental to almost all of them is the degree of contrast within an area which contains both some of the country's most deprived neighbourhoods in close proximity to areas of very considerable wealth; the borough registers as the thirteenth most deprived in the country. This contrast, and particularly the effects of poverty and lack of affordable housing, are crucial issues for the borough.
- 1.16 Islington is easily accessible via a number of transport modes. Direct rail links connect Islington with Inner and Outer London as well as the wider South East, with Crossrail and (potentially) Crossrail 2 poised to open up additional capacity to alleviate pressure on the existing transport network.
- 1.17 Many people commute through the borough travelling between central and outer London. In terms of Islington residents, over 70% work in Islington, the City of London, Westminster or Camden. Islington has a low proportion of car-owning households but suffers from a number of heavily trafficked through-routes, particularly the A1 (Goswell Road, Upper Street, Holloway Road) and A503 (York Way, Caledonian Road and Pentonville Road/City Road).
- 1.18 Islington is a significant employment centre, evidenced by the significant positive net inflow of employees, the fourth highest of all Inner London boroughs. As manufacturing has shrunk dramatically over recent years, office-based businesses including financial and business services and, more recently, technology and creative industries, have all grown rapidly, mirroring the structural shift towards a service-based economy seen across the UK. At present, employment sectors are diverse although most employment space and jobs are concentrated in the south of the borough.
- 1.19 The borough is a popular place to live and visit and is valued for its built environment. Islington's mix of shopping, restaurants, culture and night-time economy, rich architecture and walkable environment draws visitors wishing to explore beyond the standard tourist attractions of central London.
- 1.20 Islington comprised a number of villages before it became a suburb of Victorian London and continues to have its own character. The borough has important features which predate the significant Georgian and Victorian heritage, for example the shape and space of Clerkenwell Green and Islington Green. It is also home to some fine examples of contemporary architecture.
- 1.21 Major growth and change has occurred on Islington's doorstep. The Olympics have transformed Stratford to the east, with significant development to the west at King's Cross. The south of the borough is located within the Central Activities Zone, the main commercial centre of the city where employment uses, particularly business floorspace is prioritised.
- 1.22 Islington, by contrast, has little by way of major new development sites at present, certainly sites of regional significance. This is in part due to the character of the borough, shortage of developable land and the historic pattern of development. The development strategy advocated in recent years, by the Mayor of London and by Government, was to focus new development in Inner London, on brownfield sites. Islington has made a significant contribution to delivery of new housing and employment space over the past two decades, in line with this overarching development strategy; our small size has not prevented the borough taking a bold and

expansive approach to new development. However, we have now reached a critical point; given the densely developed nature of Islington and its small size, development opportunities to facilitate further growth are decreasing significantly.

- 1.23 The challenge we face is to build on the distinctiveness of Islington – the people and places within the borough that make it unique – while ensuring that the borough grows in an inclusive and sustainable way as part of one of the largest and most populous cities in the world.
- 1.24 The new London Plan recognises this challenge explicitly. It advocates a multi-faceted spatial approach to development, recognising that if London is to meet the challenges of the future, all parts of London will need to embrace and manage change. This is not necessarily transformative change – in many places, the London Plan envisages that change will occur incrementally, and recognises that there needs to be a strong focus on sustainable and inclusive regeneration, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment.
- 1.25 In terms of housing growth, the London Plan seeks to meet the vast majority of London’s housing need. Opportunity Areas have the potential to deliver a substantial amount of new homes (as well as employment growth) and are expected to do a lot of the heavy lifting in terms of meeting overall needs. However, the London Plan also emphasises the importance of small sites to meet housing need, with a focus on incremental, appropriate suburban intensification, and the introduction of a presumption in favour of small housing development.

## Vision and objectives

- 1.26 The Islington Local Plan is underpinned by a clear vision:

**To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.**

- 1.27 Islington has a thriving economy and its location in close proximity to central London means it is well placed to continue to develop successfully. This success must feed through into all elements of our communities. This is fundamental to creating and maintaining a fairer borough and delivering sustainable development.
- 1.28 To ensure that the vision becomes reality, the Local Plan sets out seven clear objectives, which are the basis for the policies set out in the following chapters, and which, if delivered, will create and sustain a fairer Islington. These objectives are not drafted to sit idle in the Local Plan introduction; they must be actively considered from the very first stage of a development proposal. Each and every development in the borough, from small roof extensions and street furniture to major mixed use housing and employment sites, should contribute to delivery of the council’s objectives. Any development proposal which does not proactively engage with and address these objectives will not be acceptable.

## **Objective 1: Homes - Delivering decent and genuinely affordable homes for all**

- 1.29 There is a pressing need to reduce inequality and the negative consequences of relative poverty in Islington, so that every person has the same opportunity to reach their potential. Islington is a very polarised place of rising inequality and high levels of poverty, where wealthy and deprived areas are in close proximity throughout the borough. Those who are poorest are most likely to experience poor physical and mental health, have lower educational attainment, and be engaged in or be a victim of crime.
- 1.30 Maximising the delivery of genuinely affordable housing of a high quality is a key aspect of the Local Plan, which will help tackle inequality in the borough and improve quality of life for residents.
- 1.31 Evidence suggests a significant need for genuinely affordable housing, which means homes that people can live in without spending very high proportions of their incomes on housing costs.

## **Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living**

- 1.32 The council strives to make Islington somewhere where everyone, regardless of skills, experience or background, can truly and meaningfully share in and shape the success of an area. To deliver this, an economy needs to be inclusive and must work for everyone, working from the bottom up rather than 'trickle down' from the top, providing new employment opportunities for all sections of the boroughs residents.
- 1.33 The council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy is not just beneficial to the borough's disadvantaged residents on an individual level. By reducing social inequality, it enables more cohesive and resilient local communities. A diverse local economy that contains a broad range and mix of sectors and businesses at varying scales is more resilient than an economy dominated by a few sectors. It is also better able to withstand an economic downturn. Economic diversity adds to the character of the borough making it a more attractive and interesting place to live and work. A diverse ecosystem of small locally owned businesses can rapidly respond to consumer need while offering experiences that can't be replicated through e-commerce.
- 1.34 Provision of affordable workspace and suitable space for a range of businesses, including SMEs, is key to delivering an inclusive economy, as this is a tangible mechanism to open up the local economy to those who would otherwise find it difficult or impossible to access. Provision of student bursaries, funded by new student accommodation, also offer opportunities to tackle the root cause of worklessness and give young people the opportunity to develop skills and learning.

## **Objective 3: Safety - Creating a safe and cohesive borough for all**

- 1.35 Islington is a vibrant place for people to live, work, visit or pass through. Safety and the feeling/perception of safety can be a key determinant for how vibrant and successful a place is. The council wants people to be safe and feel secure on its streets and within its open spaces. The creation and maintenance of mixed and balanced communities will be a key part of ensuring safety; this depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities.
- 1.36 Safety relates to crime and anti-social behaviour, but also other considerations such as use of transport infrastructure and the public realm. Designing out crime is a key

planning principle, which incorporates a number of design techniques to limit incidences of crime; this includes increases in natural surveillance and designing space so it is conducive to positive behaviour

- 1.37 Risks of physical harm, for example, from perceived danger in the public realm where pedestrians, cyclist and vehicles all operate in close proximity to one another. Without clear delineation of routes for different modes of transport, the risk of accidents and collisions increases.

#### **Objective 4: Children and Young People - Making Islington the best place for all young people to grow up**

- 1.38 The Local Plan aims to deliver development that is adaptable and usable for people of all ages. The importance of ensuring that children and young people have access to the right facilities as they grow cannot be overstated. Ensuring a child friendly environment for children and young people ensures that they get the best start in life, and will enable them to achieve their full potential.
- 1.39 Planning is an important tool to facilitate this, whether through protection and provision of social infrastructure such as schools, libraries and community centres; protection of a range of spaces of all shapes and sizes, both soft and hard landscaped, where play and activity can occur; or by ensuring good quality housing with enough space for children and young people to lead healthy lives.

#### **Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all**

- 1.40 The quality of Islington's places and spaces support the borough's diverse communities and its commercial, cultural and social life. The success of any development depends largely on how it relates and contributes to its context. There are no sites within the borough that are so large or so detached from their surroundings that the context can be ignored. It must also be recognised that a site's context is dynamic, constantly evolving with time and use and any new development must be sufficiently resilient to, and capable of flexing with, that change. All planning applications must take into account the wider physical, social, economic, cultural, historic and green infrastructure; identifying the opportunities and challenges each presents.
- 1.41 This is not just individual buildings but the wider neighbourhood, public realm, transport and associated social infrastructure. An inclusive place should facilitate social cohesion and community stability, avoiding the need for unwanted or premature moves. It should also support the local economy, enabling service providers to benefit from the patronage of the whole community.
- 1.42 The creation and maintenance of mixed and balanced communities depends on a detailed understanding of how new developments can integrate into existing strong and cohesive communities. The way in which a site connects with and 'stitches into' its surroundings, and how it might be developed to improve those, or create new, connections is a vital part of the assessment of new development. Those connections might be for pedestrians, bikes, wildlife, visual links, way-finding, sunlight and or drainage; improving the site's amenity and its contribution to the amenity of the area. Each should be carefully considered to deliver safe, inclusive, functional and efficient routes.
- 1.43 An inclusive place features socially inclusive neighbourhoods without barriers, which enables a range of users to access spaces and interact within them. For example,

developments should increase rather than reduce permeability; residential and commercial developments should not be gated. This will enhance the dignity of individuals, supporting their use and enjoyment of facilities on their own terms. To that end design proposals that separate users and deliver an inferior experience, on the basis of a person's age, disability, race, gender, wealth, or any other characteristic, will be resisted.

- 1.44 Places and spaces must be designed with diversity in mind, so that they are convenient and enjoyable for all to use; addressing the specific and potentially conflicting physical, sensory, cognitive and social needs of people protected by current equalities legislation. This will ensure that barriers are designed out and flexibility built in, avoiding the need for awkward and or unsightly adaptations. The provision of accessible, essential and appropriate services to support a development will allow independent use and contribute to the cohesion and sustainability of the community.
- 1.45 The success of inclusive design will often be affected as much by its management as by its physical form. However, shortcomings in the latter frequently place unreasonable and unsustainable demands on the former. All development must resolve issues in physical form rather than any reliance on future management arrangements.
- 1.46 Attention should also be given to the quality of spaces around or between buildings; determining their social, environmental, historical, cultural and aesthetic value, whilst connecting, reflecting and enhancing the structures and spaces they link.
- 1.47 Islington has the second lowest proportion of green space (as a proportion of overall land), and the second lowest amount of open space, of any local authority in the country. As a small but densely populated borough, green and open space is highly valued but under continued pressure in light of housing, population and employment growth. Planning has a key role in balancing the pressures of development with the need to provide a high quality green infrastructure to meet the needs of Islington's communities.
- 1.48 Provision of green and open space provides multiple benefits. It is extremely important for residents' health and wellbeing. It provides space for recreation and play, supporting the development of a child-friendly borough. It can also act as a space for mental relief and a place to escape; parts of the borough experience issues with overcrowded housing, therefore the availability of green and open spaces – however small – can be an important resource for these residents. In addition, it protects and enhances biodiversity, lessens flood risk, improves air quality and helps with mitigating the impact of climate change
- 1.49 Development should continue to make efficient use of land and fully integrate with, and relate positively to, its immediate neighbours and locality. This principle ensures that regard is had to the historic environment whilst enabling sensible evolution of character and facilitating new development.
- 1.50 Planning has a significant role to play in minimising the borough's contribution to climate change and ensuring that the impacts of climate change can be effectively mitigated. Climate change impacts are increasingly affecting the day-to-day lives of people who live in, work in and visit Islington. From the Urban Heat Island effect to extreme winter temperatures, this threatens the health and wellbeing of these people and also the physical fabric of the borough which makes it a place where people want to be.

- 1.51 The approach to tackling climate change is multi-faceted, including provision of more green infrastructure, ensuring buildings are designed sustainably and promoting less polluting modes of transport, in particular walking, cycling and public transport.

### **Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives**

- 1.52 Spatial planning can positively influence the wider determinants of health by shaping a healthier environment for people of all ages, abilities and backgrounds across the borough, from ensuring every child has the best start in life to creating healthy, inclusive environments for older and disabled people.
- 1.53 This includes facilitating active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; increased urban greening and open space and safe places for active play and food growing, and is accessible by walking, cycling and public transport.
- 1.54 Tackling inequality and poverty can also have a significant impact on health and wellbeing. Islington has wealthy and deprived areas located cheek by jowl throughout the borough. Those who are poorest are also most likely to experience poor physical and mental health, lower educational attainment, and be engaged in or be a victim of crime. Islington residents experience poorer physical and mental health that results in early deaths from cancer and circulatory disease, caused in large part due to deprivation across all Islington wards coupled with unhealthy lifestyle choices and poor access to the right services at the right time. Deprivation is the main risk factor for early death and poor health in Islington.
- 1.55 At the same time, life expectancy is increasing overall, meaning that some people are living longer but in poor health with more long-term physical and mental health conditions and an increase in the number of people living with dementia. This requires the creation of a healthy environment that contributes towards preventing ill-health, but also one where people are supported to live independently, for longer, in their community. Planning can help to create social, civic spaces which increases interaction of people from all walks of life. This can help address issues of loneliness and social isolation which affect certain residents, and which can have a detrimental impact on health and wellbeing, particularly mental health.

### **Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources**

- 1.56 Planning delivers holistic benefits and considers issues over the long-term. Proper planning can help to identify and mitigate issues, thereby saving money and resources in future, building resilience. The examples of this are numerous, whether requiring energy efficiency measures to address fuel poverty, which saves families £100s and may lessen chances of them requiring support services in future; or by ensuring that hot food takeaways are not opened up near schools, contributing to reduced level of childhood obesity which has knock on benefits for health spending amongst other things.
- 1.57 To be truly proactive and contribute fully to ensuring efficiency of resources will require further improvements in those policy areas where we are already doing well, and developing effective solutions for policy areas which are currently not delivering as they should be.

## Site appraisal and design process

- 1.58 All developments start with an appraisal of a site, in terms of its capacity for development but also what type and form of development is likely to be acceptable. The Local Plan objectives are the starting point for designing a development proposal; all development in the borough must seek to deliver holistic benefits in line with these objectives.
- 1.59 A comprehensive site analysis should be submitted as part of all planning applications, comprising an assessment of:
- architectural and design quality and detailing, such as colour, type, source and texture of detailing and materials used; poorly-detailed and undeliverable built forms are not appropriate;
  - the architectural or historic significance of any designated (listed buildings and conservation areas) and non-undesignated heritage assets which form the historic environment;
  - urban form, such as building lines, frontages, plot sizes and patterns, building heights, storey heights and massing;
  - movement and spatial patterns, such as definition, scale, use, detailing and surface treatment of routes and spaces;
  - local amenity, such as consideration of noise and the impact of disturbance, hours of operation, vibration, pollution, fumes between and within developments, overshadowing, overlooking, privacy, over-dominance, sense of enclosure and outlook;
  - consideration of the nature of the proposed use and how its operation will interact with the surrounding area
  - strategic and local and other site specific views, skylines and silhouettes, and scale and form of townscape set pieces or urban compositions;
  - daylight and sunlight levels, based on guidance from the Building Research Establishment (BRE) and any other relevant best practice/guidance.
  - existing features and patterns of use: housing, retail, entertainment, commercial, community and or play activities;
  - infrastructure provision and impacts that development will have on this provision;
  - the accessibility (physical, social, and economic) of the street in context; including technical survey and feedback on user experience;
  - the local landscape including a tree survey, analysis of the local ecology and green links;
  - surface water flows and opportunities to capture them;
  - utilities above and below ground;
  - traffic, including pedestrian flows at different times of the day and week, and an analysis of what modal shift might be possible; and
  - route and place qualities
- 1.60 In order to deliver high quality design and demonstrate that all design policy requirements have been considered from the very first stage of a proposal, applicants/developers will be expected to demonstrate a rigorous design process that:
- Is multidisciplinary, bringing together functional, technical and aesthetic considerations;
  - Employs relevant specialist expertise;
  - Engages with the planning authority from the earliest stages;



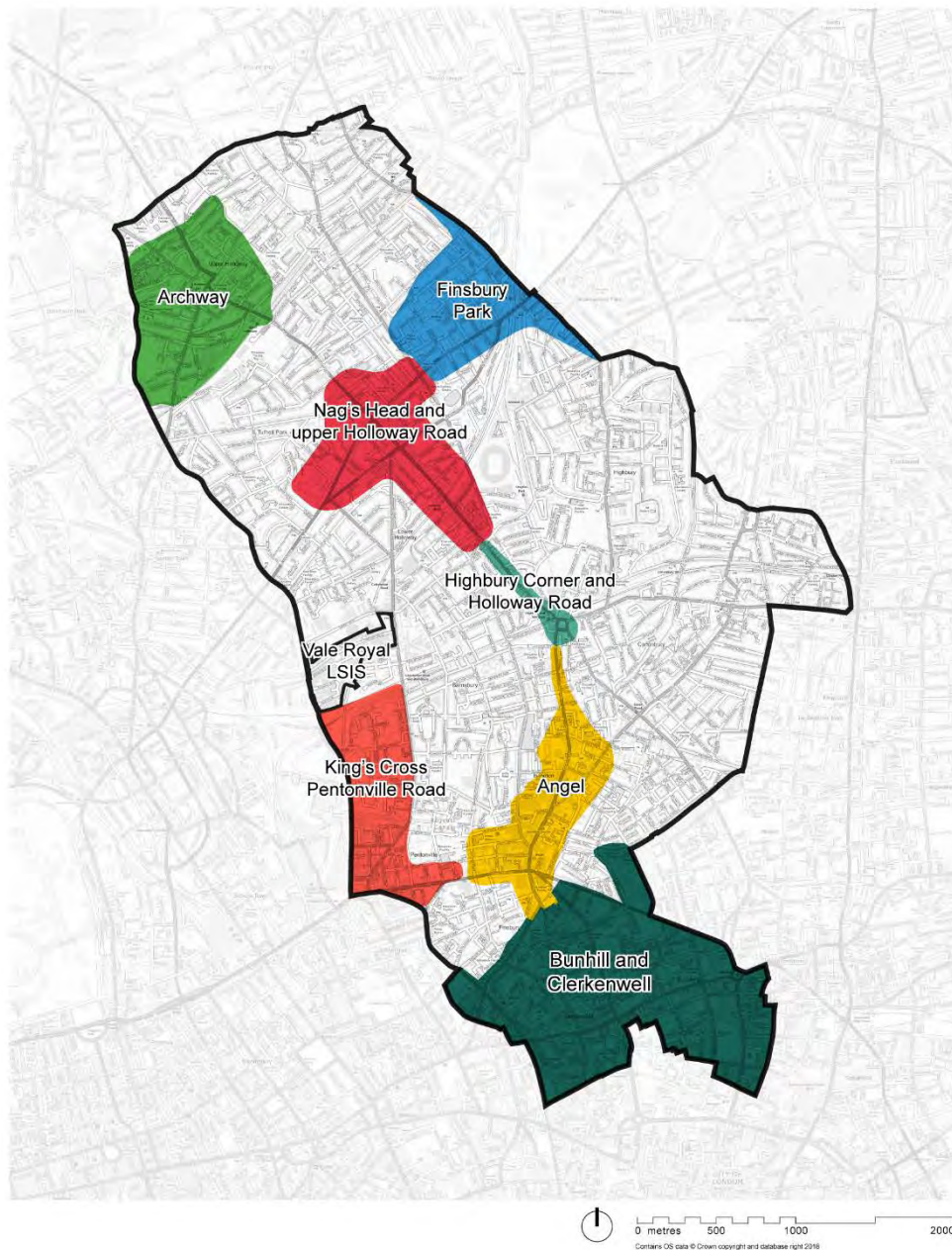
- Places people at the heart of the process;
- Brings together the design and management of the built environment; and
- Is regularly monitored and evaluated.

1.61 The design process does not end once an application is permitted. All elements of proposed building designs must be demonstrably deliverable. In the realisation of buildings from plans to build-out, their design quality can often be compromised by poorly-considered detailing and inappropriate materials. Such 'value engineering' approaches, which dilute the design quality of approved schemes and often make schemes difficult to maintain, will be resisted.

# 2 Area Spatial Strategies

2.1 This section sets out a number of spatial policies for various parts of the borough where growth and change is expected to occur within the plan period. These areas are shown on Figure 2.1 below:

**Figure 2.1: Islington Spatial Strategy areas**



- 2.2 Each spatial strategy policy (SP1 to SP7) sets out the key priorities and requirements for the respective areas, with a detailed spatial strategy map visualising these. All development proposals within the spatial strategy areas must be actively consider how they will address the Local Plan objectives, from the very first stage of the proposal through to any eventual permission.
- 2.3 The parts of Islington not covered by a spatial strategy area will still experience development and change over the plan period, but it is not expected to be at the same scale as the defined areas. Relevant Local Plan policies in chapters 3 to 9 will apply where proposals come forward in these parts of the borough.

## Area Spatial Strategy policies

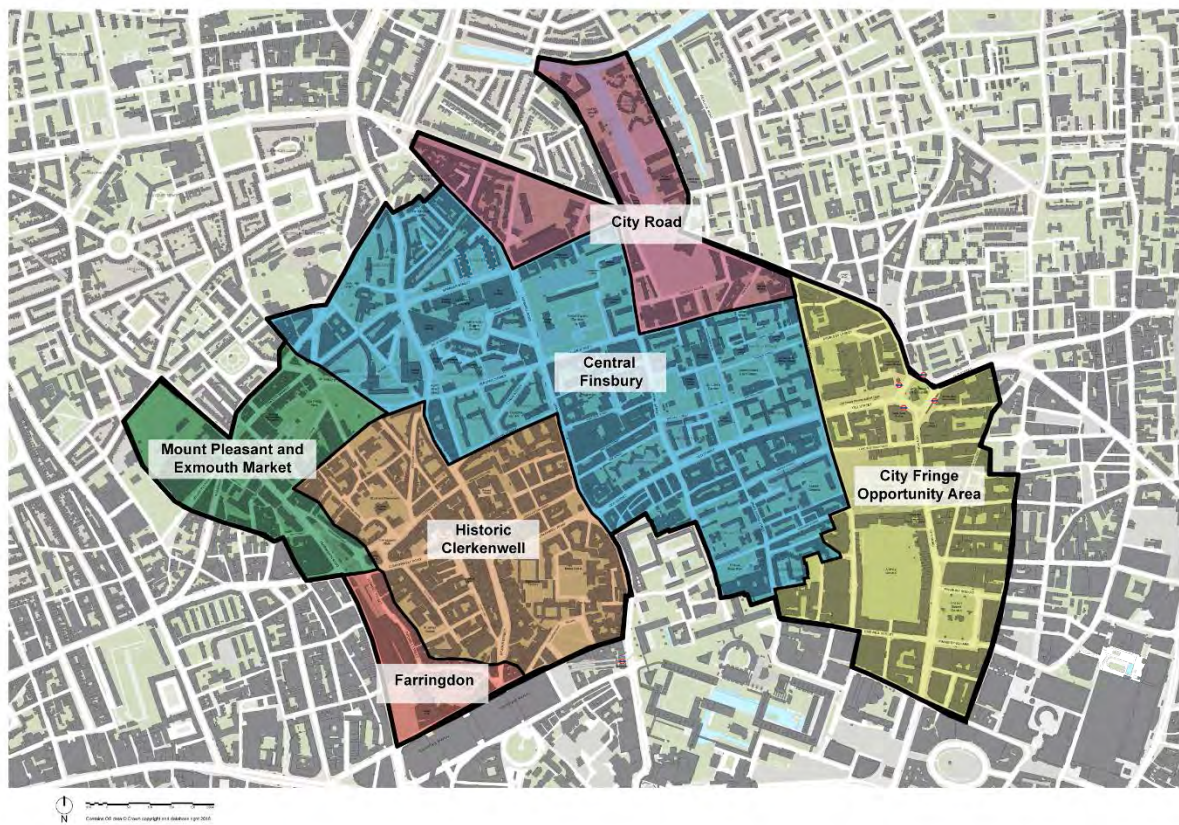
### Policy SP1: Bunhill & Clerkenwell

- A. The Bunhill & Clerkenwell area is made up of following six Spatial Strategy areas (shown on Figure 2.2):
- City Fringe Opportunity Area
  - City Road
  - Farringdon
  - Mount Pleasant and Exmouth Market
  - Central Finsbury
  - Historic Clerkenwell
- B. The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations. These areas have been defined by their scope for development opportunities to meet key needs (in particular office use) and distinctive characteristics that should be maintained and enhanced.
- C. The AAP also sets out area-wide policies focused on prioritising and supporting the office function of the area.

- 2.4 Bunhill and Clerkenwell is the area in the borough expected to see the most significant levels of growth, particularly business floorspace. This growth must be managed, to secure a high quality and sustainable urban environment, to promote economic growth and employment, and also to address the deep challenges including deprivation, social mobility, and environmental problems.
- 2.5 The Bunhill and Clerkenwell Area Action Plan (AAP) sets out area-specific policy for the majority of the Bunhill and Clerkenwell wards of Islington. The plan area lies within the Central Activities Zone (CAZ) and comprises almost all of Islington's portion of this area; Figure 2.1 shows the location of the AAP area in relation the rest of the borough. The AAP identifies a number of site allocations where new development is expected to come forward. The AAP operates in conjunction with this Local Plan: Strategic and Development Management Policies document.

- 2.6 The area is the most significant location for commercial growth in Islington, particularly office floorspace. Bunhill and Clerkenwell has a large and successful economy and is home to 70% of Islington's jobs, the majority of which are office-based. Local and regional evidence is clear that the CAZ is the location with the most demand for office space and this will be the priority land use within the AAP area.
- 2.7 The area also has a rich variety of cultural, entertainment and leisure uses. These uses are integral to supporting the predominant office-led employment function of the area, but they also contribute to a significant night-time economy and the creation of a dynamic and attractive place in their own right.
- 2.8 Bunhill and Clerkenwell is also home to a variety of education and medical uses and has a significant residential population, including a number of housing estates across the area. The area is very well connected to London and this will be further improved upon completion of Crossrail.

**Figure 2.2: Bunhill and Clerkenwell AAP area boundary and Spatial Strategy areas**



## Policy SP2: King's Cross and Pentonville Road

- A. The King's Cross Spatial Strategy area is partly covered by the Central Activities Zone (CAZ), while the remaining part is a CAZ fringe location, including the King's Cross Priority Employment Location. Within these locations existing business uses will be safeguarded and proposals for the intensification, renewal and modernisation of existing business floorspace is encouraged. Proposals for new business floorspace are required to maximise the provision of business floorspace.
- B. The Knowledge Quarter refers to the area around King's Cross where many important institutions spanning research, higher education, science, art, culture and media are based. Maximisation of office floorspace in the King's Cross area could support the expansion of the 'Knowledge Quarter' in Islington, and advance the development of a commercial corridor along Pentonville Road/City Road.
- C. A broad range of office floorspace typologies are suitable within the spatial strategy area, including Grade A offices, secondary space, hybrid space, business centres and co-working space.
- D. The Local Shopping Areas of Kings Cross, Caledonian Road (Copenhagen Street) and Caledonian Road (Central) are located in the spatial strategy area. The existing retail and service function will be maintained and enhanced in line with Policy R4. These shopping areas should function together collectively to form a 'high street' along Caledonian Road, which should continue to provide important services for local communities, particularly retail and leisure.
- E. Opportunities to repair, improve and unify existing frontages on Caledonian Road will be supported, in particular the stretch between the junctions of Twyford Street and Copenhagen Street.
- F. The council aims to improve the pedestrian, cyclist and bus network and will seek to reduce traffic access on some residential roads. Improvements to public transport capacity are supported. General improvements to the public realm, specifically along York Way and Caledonian Road, will create a safer and better-quality environment for pedestrians and cyclists.
- G. The council will seek to improve connectivity and permeability for pedestrians and cyclists, within and across the Kings Cross area and nearby neighbourhoods, particularly east-west access. Removing barriers to movement and integrating the urban fabric are key priorities for the whole area, but particularly between the area east of York Way and King's Cross Central. All new development proposals, transport and other public realm schemes should contribute towards achieving these priorities.
- H. Regent's Canal will continue to be an important multifunctional route, primarily as a wildlife corridor and also as a route for pedestrians and as a recreational space. Access to the canal should be improved, while ensuring that increased access does not cause detrimental impacts, particularly for biodiversity.
- I. Proposals for residential moorings will only be acceptable on the south of the canal (off-side), and where supporting uses and facilities are in place. Residential moorings should not impede public access, hinder navigation along the waterway,

or have a detrimental impact on air quality, nature conservation / biodiversity, leisure provision, and the character of the waterway.

- J. King's Cross has a significant, distinct character, and the area contains a number of heritage assets, including the Regent's Canal and a number of listed buildings. The area's historic character will be protected and enhanced, with high quality design encouraged to respect the local context of King's Cross and its surroundings.
- K. Four sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.

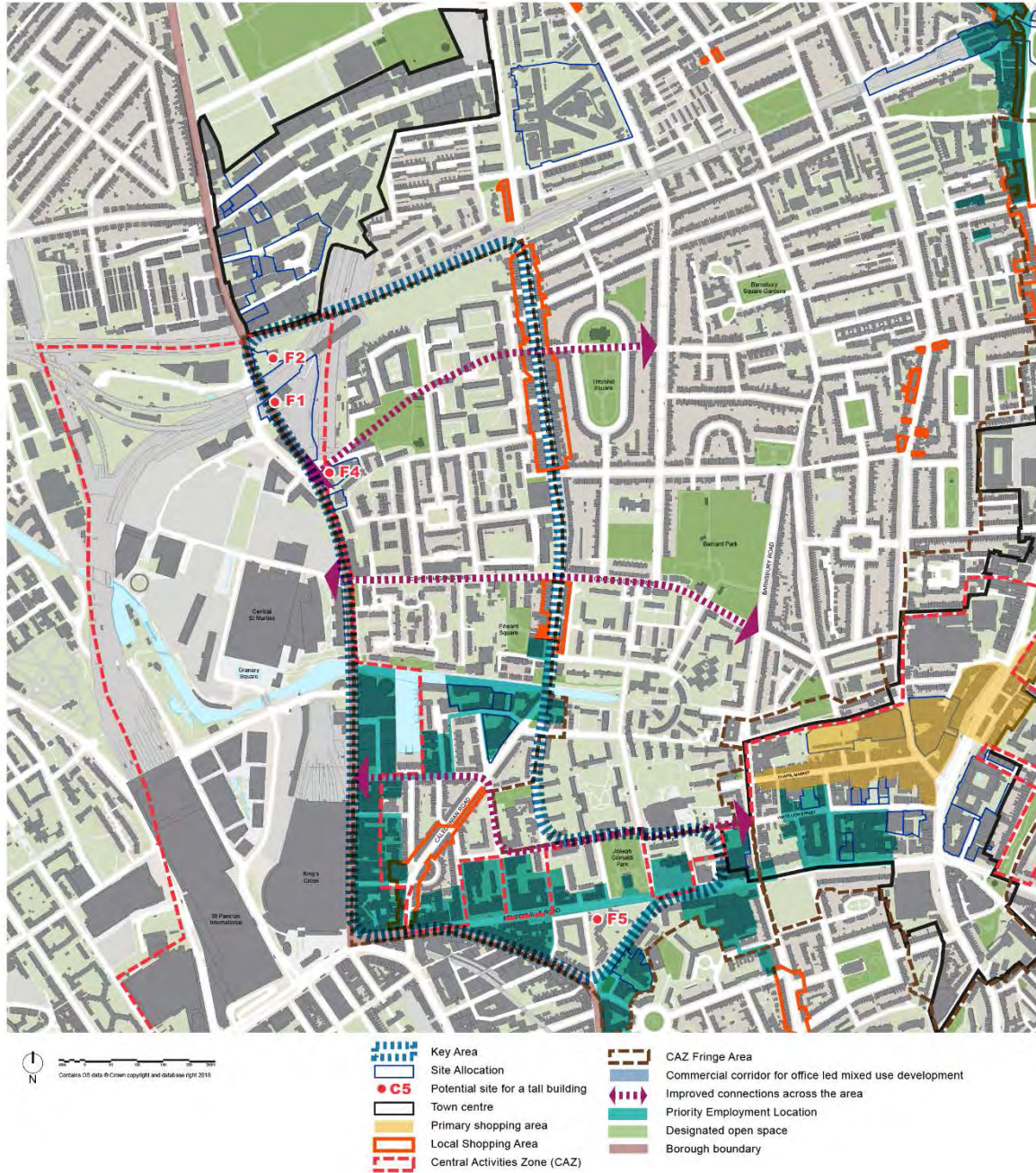
- 2.9 Kings Cross is continuing to develop as a key commercial destination and important transport hub. High-density development delivering office, retail and leisure space, as well as housing, has taken place on both sides of the Camden/Islington boundary. A central London location, and excellent local, national and international transport links, has enabled the high quality regeneration of the area to successfully attract high profile commercial tenants.
- 2.10 As the development of the King's Cross Central site adjacent to the railway tracks continues into the plan period, it will bring further change to the character of the area. The development is already producing a noticeable 'halo' effect, with office buildings that pre-date the development observed to be busy and fully occupied. It is considered that this effect will only intensify as the King's Cross Central development matures.
- 2.11 There is an opportunity for the King's Cross area to help meet the significant projected jobs growth and support the economic growth of the borough over the plan period, through protection of existing commercial floorspace across the area, including in the Priority Employment Locations covering York Road, Regent's Wharf, Wharfdale Road and Regent's Quarter; and through the intensification of business uses across the area. Proposals for new business floorspace are required to maximise the provision of business floorspace in these locations and proposals which are not considered to maximise business floorspace will not be allowed.
- 2.12 The remainder of the CAZ fringe area – outside of the PELs – may also be appropriate for the development of business floorspace as the 'halo effect' from the King's Cross central development continues.
- 2.13 Many important academic and cultural institutions are based within the King's Cross area, including the British Library and the Francis Crick Institute in Camden and Kings Place and the Institute of Physics in Islington. To promote collaboration and forge closer links to the community a growing number of local organisations have come together under the umbrella of the 'Knowledge Quarter'. The Knowledge Quarter aims to market the commercial potential of the area as an incubator of innovation, given its excellent transport links and access to local universities and other institutions carrying out important research work.
- 2.14 The activities of the Knowledge Quarter could encourage and support development which Camden and Islington Councils could harness for employment opportunities for local residents. This could range from employment opportunities in Knowledge Quarter industries; placements, apprenticeships, training and skills development, to affordable workspace acquisition. Ensuring an adequate supply of business floorspace in the key area will support the Knowledge Quarter. The Knowledge Quarter could also support the development and enhancement of the commercial corridor, in particular the

provision of additional business space of various typologies, along Pentonville Road/City Road, down to Old Street and the City of London boundary.

- 2.15 Aside from being an important business location, the King's Cross area also has a retail function. Three Local Shopping Areas are located within the area – King's Cross, Caledonian Road (Copenhagen Street) and Caledonian Road (Central). These areas, whilst small in scale compared to Islington's Town Centres, serve an important role for local residents and workers, and should be maintained and enhanced.
- 2.16 As the regeneration of King's Cross continues, it is likely that this will impact surrounding areas, such as 'the Cally' – a commercial section of Caledonian Road between Regent's Canal north and Pentonville Prison. The council believes that local people and businesses in this area should benefit from the regeneration of King's Cross. The Local Shopping Areas on Caledonian Road should continue to serve local people. There are also opportunities for improving existing frontages on Caledonian Road, particularly between the junction of Twyford Street and Copenhagen Street, and improving connectivity and the urban fabric in this area. The Cally Plan SPD provides further guidance.
- 2.17 Kings Cross will continue to be a nationally and internationally significant transport hub. The expansion of the area presents several opportunities for improving the road network and public realm, and the need to improve the existing road network increases with this expansion. This may include improvements to the pedestrian, cyclist and bus networks and measures to reduce traffic on some residential roads. The council also encourages general walking and cycling improvements in the area, including the creation of east-west cycle routes.
- 2.18 There is a long term aspiration to see a Piccadilly line station operating from former York Road Piccadilly line tube station. The Council would also like to see the former Maiden Lane station (immediately over the borough boundary in Camden) re-opened, which could provide additional transport capacity for the area. Complimentary development, particularly business floorspace, would be expected to be provided as part of any proposal for York Road station. There is also an opportunity for site assembly with adjacent sites including the allocated site at 176-178 York Way & 57-65 Randell's Road, to realise greater development opportunities.
- 2.19 Much of the area is covered by Conservation Areas and there are several listed and locally listed buildings located here. The historic character of the area should be enhanced and maintained and any development should have regard to any listed or locally listed buildings located nearby.
- 2.20 The Islington Tall Building study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Building study (2018) and must be read alongside this spatial strategy policy. The Spatial Strategy diagram (Figure 2.3) identifies the following four sites where tall buildings (30 metres and above) may be appropriate in the King's Cross spatial strategy area:
  - Railway land and substation on York Way, opposite student housing tower (site F1 from the study).
  - Railway land between Overground and HS1 tracks, east of York Way (site F2 from study).
  - 176-178 York Way, car wash site (site F4 from study).
  - Penton Rise Estate, corner of Weston Rise with Pentonville Road (site F5 from study).

2.21 Any proposal for tall buildings on these sites must be fully consistent with DH3 and all other relevant policies.

**Figure 2.3: King's Cross and Pentonville Road Spatial Strategy diagram**





## Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site

- A The Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS) will be retained and strengthened as the borough's most significant industrial location. The principal objective in this area is to retain and intensify B1c light industrial, B2 general industry and B8 storage and distribution uses. To ensure an adequate supply of industrial land and floorspace in Islington, proposals that would result in a net loss of industrial uses, either through change of use or redevelopment, will not be permitted. In addition, encroachment of non-industrial uses (especially residential uses) over time, which would jeopardise long term sustainability, economic function and future economic growth of the LSIS as an industrial area will not be allowed.
- B The provision of 'hybrid workspace', which may incorporate a mix of the above uses, is encouraged. Hybrid workspace is business space which accommodates a range of B Class uses, usually within older industrial buildings. Refurbishment of existing buildings or redevelopment should provide a variety of spaces that can accommodate a range of business uses, and which are suitable and affordable to SMEs.
- C The LSIS is a successful business location which accommodates a wide range of businesses. Any proposal which introduces additional offices, regardless of whether there is existing office use on site, which does not result in the building being in predominantly industrial use will be refused, as encroachment of office-led development is considered to threaten the industrial function and balance of uses in the LSIS. The development of office use may be permissible as part of a hybrid workspace scheme, but it must only constitute a small proportion of the overall gross floorspace proposed.
- D The Council recognises the contribution of businesses related to the music and entertainment industry in the area, including Tileyard Studios, and seeks to support this successful economic cluster through protecting existing uses. However, the development of new floorspace related to the music and entertainment industry uses/cluster must be in line with the land use policies set out in Parts A and C of this policy.
- E Where development is proposed – new build, alterations to existing buildings, extensions and/or demolition and redevelopment - building heights should not exceed five storeys (and in some locations should be less). Taller building elements, may be acceptable where identified in relevant site allocations. All proposals which would increase existing heights should fully address criteria in Policy DH3.
- F Development should protect and enhance heritage assets in the area. Any proposals within the viewing corridor from Randell's Road bridge to the clock tower on Market Road should be limited to three to four commercial storeys.
- G Development on York Way or Vale Royal, in proximity to the Maiden Lane tower adjacent to the western boundary of the LSIS, must be clearly sub-ordinate in height. Given the narrow street profile of York Way and Vale Royal, proposals should avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.

- |   |  |
|---|--|
| H | The LSIS is currently inward facing. Where possible, development should avoid blank frontages and create active frontages towards open spaces, such as Market Road Gardens and the sport pitches on Market Road. The creation of active frontages may also be appropriate along York Way and Caledonian Road, where consistent with the land use policies set out above. |
| I | Development proposals in the LSIS should, where possible, improve pedestrian and vehicle connections throughout the LSIS and have regard to proposed routes set out on the Spatial Strategy diagram.   |
| J | All development proposals in the LSIS must (individually and cumulatively) consider the layout, orientation, access, servicing and delivery arrangements in order to minimise conflict and to avoid potential negative impacts on highways safety and amenity. Proposals for B8 space should consider the potential provision of yard space.                             |

- 2.22 The Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS) is located on the western periphery of the borough on the border with the London Borough of Camden, near Kings Cross. It is located in close proximity to Central London and the Central Activities Zone. The area is relatively well connected by road and public transport; Caledonian Road underground and Caledonian Road and Barnsbury overground stations are located nearby.
- 2.23 The LSIS is the borough's largest concentration of industrial uses. It accommodates a wide range of businesses, including film/TV production, catering, building, plumbing and heating trade suppliers, self-storage, photographic studios, props hire, car rental and repair, and charity/social enterprises. The LSIS is significant in terms of scale, as well as in terms of its contribution to the local and Central London economies.
- 2.24 The LSIS has two distinct business clusters. The first provides services to the music and entertainment industries and includes Tileyard Studios which comprises around 10,000 sqm of studio, writing and office space dedicated to the music industry. The second cluster comprises a number of catering operations which are located throughout the LSIS.
- 2.25 The LSIS is an important, vibrant industrial location. It is well occupied and vacancy rates are considerably lower than the optimum 8% frictional vacancy rate. Evidence suggests there is high demand and a lack of supply for such industrial space in Islington. This is typical of inner London boroughs where large scale industrial areas are generally scarce, particularly within densely populated boroughs such as Islington. This reinforces the need to safeguard the existing functions of the LSIS.
- 2.26 Islington has lost a significant amount of industrial space in recent years – between 2005 and 2015 approximately 125,000 sqm of B2 and B8 floorspace was granted permission to convert to other uses. These losses are over and above the indicative industrial land release benchmark as set by the Mayor. In less than five years, Islington has lost industrial space equivalent to the 20-year release benchmark as set by the Mayor. This means that the council must strengthen its policies to avoid further losses to its limited industrial land stock.
- 2.27 The retention and intensification of industrial uses in the Vale Royal / Brewery Road LSIS is a key priority. The Council considers industrial uses to be those which fall within B1c light industrial, B2 general industry and B8 storage and distribution, as well

as certain Sui Generis uses with a clear industrial function. The LSIS should be protected and nurtured for a range of industrial uses, including the provision of hybrid workspace, which is particularly supported. Hybrid workspace is generally considered to be older, industrial style stock that has been refurbished as studio / light production space. The Council's evidence also suggests that the LSIS is an appropriate location for providing space for start-up companies and SMEs, in particular older, lower value stock which remains perfectly functional.

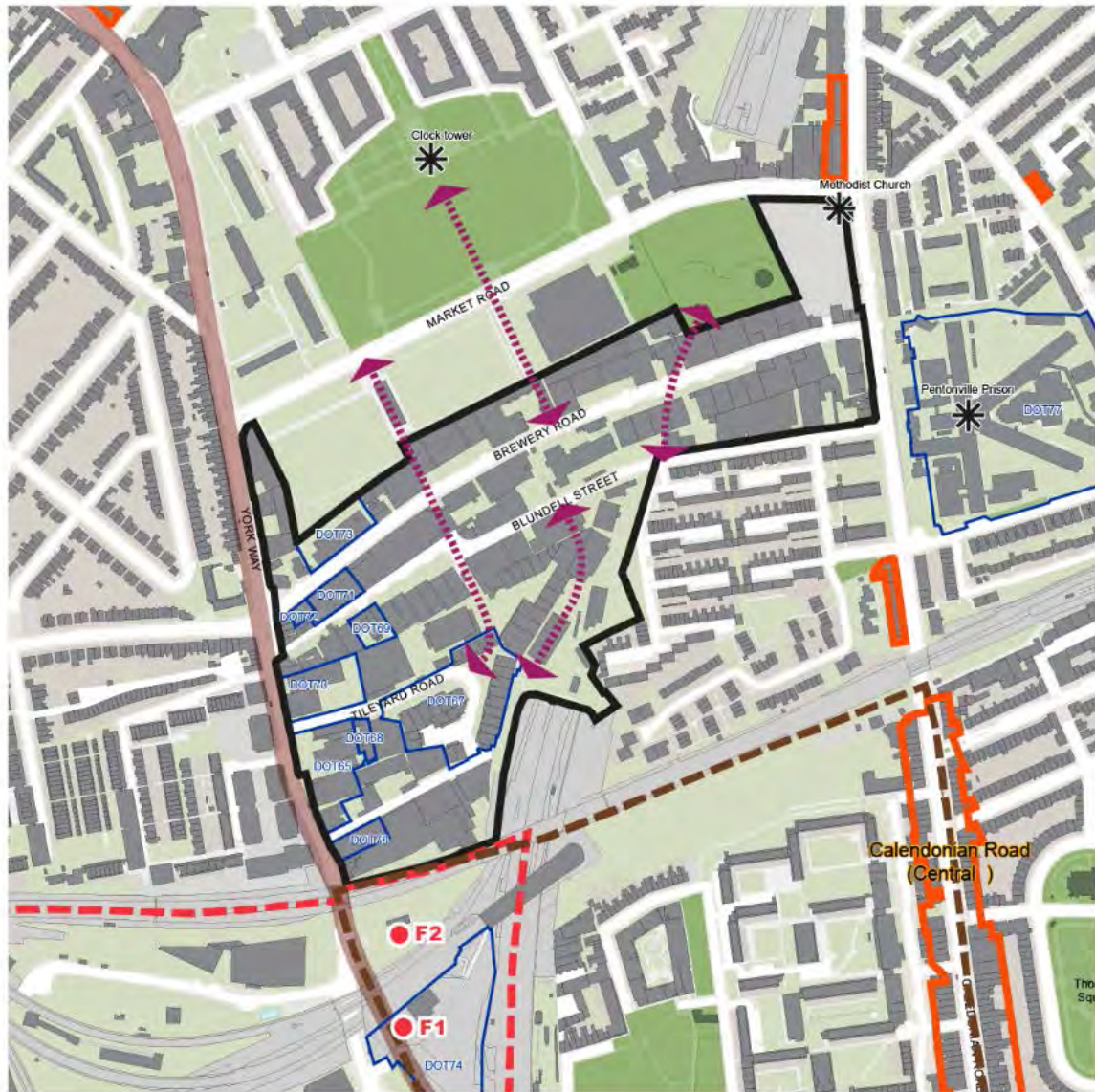
- 2.28 Maintaining and intensifying the current functions of the LSIS will also ensure that businesses can continue to benefit from being located in close proximity to one another. These 'agglomeration benefits' can include increased productivity levels, having access to a pool of labour, and enabling businesses to attract and retain skilled labour. Other benefits include fostering collaboration and the transfer of knowledge, innovation and technology between businesses and sectors. Aside from these benefits, there may be potential synergies between the music and entertainment businesses and catering businesses within the LSIS. Evidence produced by the council also states that the area provides space that is crucial in accommodating businesses who service both the wider borough and Central London economy. These important functions and industrial uses will be safeguarded and promoted.
- 2.29 B1a office space is sought elsewhere in the borough – particularly in the CAZ and other designated areas - due to its contribution to jobs growth and employment floorspace. However, in the LSIS specifically, other forms of business floorspace are prioritised, and proposals involving additional floorspace should not result in the overall building being in more than 20% office use. The predominant land use should be industrial use (B1c, B2 and B8). Office uses may be acceptable as part of a hybrid workspace scheme where it is clear that it is not the predominant use. The introduction of uses which could compromise the economic function and future economic growth of the LSIS (especially residential uses) will not be allowed, either stand-alone or as part of mixed-use or co-location schemes.
- 2.30 Development proposals in the Vale Royal / Brewery Road LSIS should, as a minimum, not result in a net loss of industrial floorspace. Proposals involving the loss of industrial floorspace must consider the requirements set out in policy E3 and demonstrate there is no demand for the use of the floorspace, unit, building and/or site, for a use appropriate to the primary industrial function.
- 2.31 The extent of potential additional industrial development will vary depending on the current use and occupancy of existing sites. Some sites in the LSIS may have potential for substantial, additional industrial development given they are low rise and / or underused. It is these sites that present the greatest opportunities for the delivery of typical industrial space.
- 2.32 All development proposals in the LSIS should maximise the provision of industrial uses, including the delivery of hybrid workspace in the LSIS. Hybrid workspace combines features of light industrial, studio and production space, and sometimes elements of office. Where new B uses are provided, conditions will be attached to the permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific industrial use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application. By maximising these appropriate industrial uses, the LSIS can be developed without harming the delicate balance of existing industrial uses (including lower value uses) that are vital in sustaining economic diversity in the borough, and in supporting the wider economy.

- 2.33 A detailed urban design and character assessment undertaken for the LSIS and its wider context concluded that a maximum height of around 20m (approximately 5 commercial storeys) would be appropriate in the LSIS. Buildings of over 5 storeys may have a negative impact upon the scale of the streets within the LSIS and may appear overbearing, due to narrow road widths. It is also considered that 5 storeys is appropriate in terms of responding sensitively to the area's historic setting and heritage assets. Building height should step down to 12-16m (3 to 4 commercial storeys) within the viewing corridor to the Market Road Clock Tower, a designated local landmark which can be seen from Randell's Road Bridge, as shown in Figure 2.4. This will ensure that the view of this landmark is preserved and will maintain appropriate building height to street width ratio.
- 2.34 The LSIS's industrial function has been maintained for a number of years - this is recognisable in some of the remaining historic buildings and in the layout and scale of the streets. Refurbishment, conversion and extension of existing older buildings is preferred to demolition and redevelopment schemes. New development should respond sensitively to existing historic buildings; this could include stepping down building heights to avoid domination of the street scene.
- 2.35 The LSIS is characterised by narrow streets. Private forecourts and the limited height of industrial units currently alleviate the impact on the scale of the street. To avoid an overbearing scale of the street – a canyon effect - and allow light penetration, new development should ensure that the width to height ratio of street does not exceed 1:1.35 and optimally stays below 1:1. This can be achieved by the stepping back of development above a certain height on the building line or by sufficiently pulling the building line back from the street. Any development in the western edge of the LSIS, along York Way, will need to be clearly sub-ordinate in height as due to the narrow street profile, there is a risk of creating an adverse canyon effect. This can be avoided through appropriate scaling and setting back development in relation to the streetscape.
- 2.36 Due to the nature of its uses, the LSIS is inward looking and frequently presents the back of development to surrounding open spaces, such as the Market Road Gardens and the sports pitches on Market Road. Where possible new development should create strong active frontages toward these open spaces, so that they can provide overlooking and animation and enhance the perception of the area. Where possible, backs should become fronts with the provision of new access routes along open spaces (mindful of policy requirements to maintain and enhance open space provision and function). The same principle applies to those building-street interfaces which are characterised by inactive fronts and blank walls. Where consistent with priority land uses in the LSIS, new development along York Way and Caledonian Road should seek to create active street frontages that define, animate and overlook the street space. The term active frontages here does not refer to the introduction of non-industrial uses, rather, development is expected to explore the potential of introducing active frontages whilst maintaining an industrial use, for example windows which allow views in and out of the building. It is recognised that industrial uses do not traditionally create active frontages so the policy should not be considered a barrier to development – the creation of industrial uses takes precedence over the creation of active frontages.
- 2.37 York Way and Caledonian Road are the primary access points to the LSIS. Most of the internal roads are narrower secondary roads which can cause issues for traffic movement within the LSIS. Whilst many sites in the LSIS incorporate parking bays or yards for larger vehicles, street widths are often inadequate to facilitate turning of vehicles in and out of plots – this is exacerbated where there is a high concentration of

on-street parking. The narrowness of the internal road network also causes pinch points at the junctions of York Way, Brandon Road and Vale Royal. These adjoining streets are less than 10m wide which impedes the flow of vehicles in and out of the LSIS. All development in the LSIS is required to demonstrate how delivery and servicing can be adequately provided and potential impacts on highways safety and amenity can be prevented. On-street delivery and servicing will generally not be acceptable for uses which require more frequent and significant vehicle movements, such as B8 uses.

- 2.38 The LSIS is poor in terms of transport movement and connectivity, particularly internally within the LSIS. The railway line along the southern border of the LSIS is a major barrier to pedestrian and cycle movement to the wider area. There are no existing north-south pedestrian or vehicular routes between Brewery Road and Blundell /Brandon Road, or between Tileyard Road and Blundell Street. There is an existing pedestrian connection between Brewery Road and Market Road – this frames the view towards the Clock Tower and should be improved where possible. To improve movement within the LSIS, the Council will seek to create new north-south routes. Where appropriate, development proposals should consider opportunities to create new north-south pedestrian routes to improve permeability throughout the LSIS, in line with Figure 2.4. Where provision of new routes would involve loss of industrial space or would mean that industrial space cannot be maximised, the wider strategic benefits of the greater connectivity may outweigh loss of space or lack of maximisation on a specific scheme (although weighting of issues is a case-specific consideration).

**Figure 2.4: Vale Royal / Brewery Road Locally Significant Industrial Site Spatial Strategy diagram**



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- |                                       |                                      |
|---------------------------------------|--------------------------------------|
| Site Allocation                       | Improved connections across the area |
| C5 Potential site for a tall building | Heritage asset                       |
| Town centre                           | Priority Employment Location         |
| Primary Shopping Area                 | Designated open space                |
| Local Shopping Area                   | Borough boundary                     |
| Central Activities Zone (CAZ)         |                                      |

## Policy SP4: Angel and Upper Street

- A Angel Town Centre has a strong retail, service and leisure offer with a large number of small and independent units. Further retail, leisure and service uses are considered suitable across Angel Town Centre to support and enhance this offer and to meet the limited need for new floorspace over the plan period. Retail uses should be directed to the Town Centre in the first instance, particularly to the Primary Shopping Area, then the Upper Street Local Shopping Area.
- B The Sainsbury's site offers an opportunity to develop a significant amount of retail and business uses and contribute to the strategic aims for retail and office uses.
- C Chapel Market will be strongly protected. Any development proposals should ensure that the character and function of the street market is not adversely impacted, and opportunities for improvement are sought where appropriate, particularly with regard to the public realm. Improvements to the public realm are encouraged at Chapel Market to help improve the management of the market and the shops, and to make this area more accessible for pedestrians.
- D Camden Passage is a specialist shopping area with a significant concentration of antique, curio and vintage stores. The unique function of this area will be strongly protected.
- E Angel Town Centre is a designated cultural quarter where existing cultural uses will be protected and new cultural uses are promoted. All development proposals within the Town Centre must enhance and protect this cultural role and ensure its continued effective operation.
- F Night-time economy uses should be directed to the Town Centre, and should demonstrate that there is no significant adverse effect on the local amenities.
- G The Upper Street Local Shopping Area should be the focus for smaller retail, leisure and service provision in-keeping with the existing character and function of the area
- H Business use is a priority land use in Angel Town Centre, and also on upper floors in the rest of the area. Existing B1 use will be protected and proposals for new business floorspace should maximise the provision of business floorspace, particularly in White Lion Street, Pentonville Road and upper floor locations across the Town Centre. The Sainsbury's site is also expected to deliver a significant amount of new business floorspace.
- I A broad range of office floorspace typologies is considered suitable within the Town Centre, including Grade A space, 'hybrid' space and co-working space. All proposals involving new and/or re-provided business floorspace must provide suitable space for SMEs.
- J Development in the Angel and Upper Street area should contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors, including through improvement of public transport capacity and experience. New development should provide good connectivity for pedestrians and cyclists, and good permeability within and through sites.

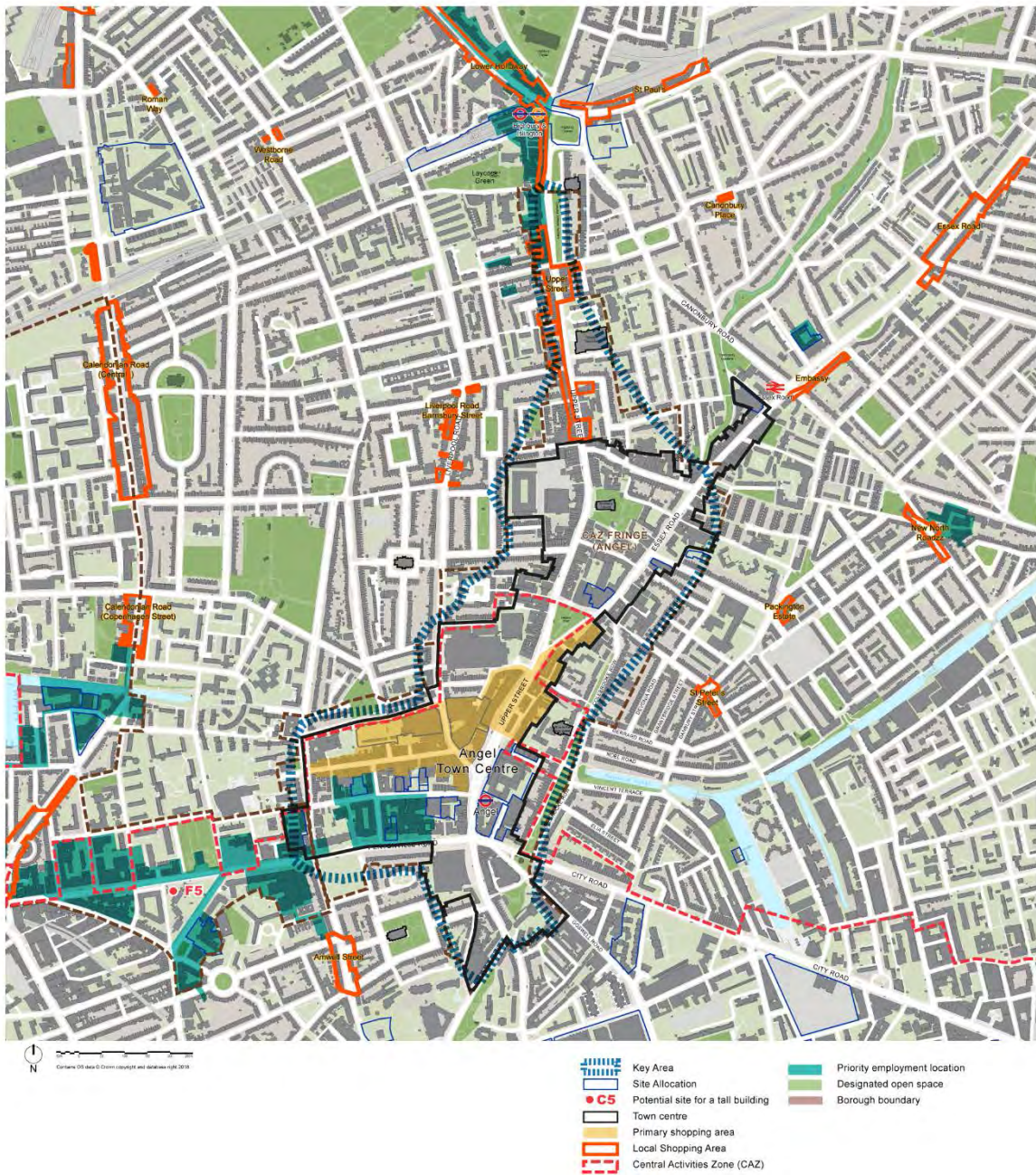
- K The council supports the development of Crossrail 2 with a station at Angel. The Crossrail 2 work sites identified on Figure 2.5 are safeguarded.
- L The Angel Crossrail 2 station should achieve an exemplary design quality with specific focus on ensuring improved permeability through, and in the vicinity of, the site. This should include the creation of a new 24-hour level access public route between City Road and Islington High Street, via Torrens Street.
- M Opportunities for public realm improvements should be prioritised as part of the Crossrail 2 project and associated development. Public spaces and street infrastructure such as pavements, cycling facilities and pedestrian crossings should adapt to accommodate any increase in activity and changes to how people move through the Town Centre.
- N Improvements to reduce the dominance of through traffic are sought around Angel station and the main junction of Islington High Street with City Road, Goswell Road and St John Street. In particular, pedestrian and cycling routes should be promoted to improve the linkages along the City Road/Pentonville Road commercial corridor.
- O The historic character of the area should be protected and enhanced through high quality design. New development should respect the local context of the Angel and Upper Street area, particularly in relation to conservation areas and local landmarks.

- 2.39 Angel is the most significant, distinctive and vibrant Town Centre in Islington. The Centre has an important role as the largest Town Centre and commercial areas within the borough, and as part of the CAZ. Angel is one of the most important areas for employment and economic growth in Islington. The council will respond to the challenges and opportunities associated with the future developments to ensure that Angel Town Centre is a place for everyone, offering a unique mix of shops, services, cultural activities, and other Town Centre uses alongside employment opportunities and an accessible and pedestrian-friendly environment.
- 2.40 Angel Town Centre serves both local communities and also attracts people from further afield, due to its vibrant shopping offer featuring a range of specialist shops and services. It is a key part of Islington's and London's evening and cultural offer and is a sub-regional cultural and visitor destination.
- 2.41 In 2007, Angel Town Centre became a Business Improvement District (BID) – known as 'Angel.London' – to deliver improvements to the trading and commercial environment in the centre. The BID boundary covers a large proportion of the Town Centre boundary.
- 2.42 The Angel and Upper Street area has a strong comparison and convenience retail offer. It accommodates a number of large supermarkets alongside independent retail shops and range of market stalls. This offer is further strengthened by Chapel Market - a traditional street market - and the specialist shopping area in Camden Passage, well known for its antique, curio and vintage stores. Both these areas contribute significantly to the character, vibrancy and vitality of the area.
- 2.43 The Sainsbury's site on Liverpool Road is the most significant development opportunity in the area. The site offers an opportunity for the development of a significant amount of retail and business floorspace, to complement and enhance the existing character and function of the area.



- 2.44 Angel Town Centre is a designated cultural quarter and successful night-time economy destination. Angel's entertainment and cultural offer is a major draw for visitors to the area, which makes a significant contribution to the economic success of the area and helps to maintain its unique character and vibrancy. This offer includes theatres such as the Almeida Theatre and Sadler's Wells and a number of theatre pubs and music venues - such as the King's Head Theatre and the Lexington - cinemas and arts centres. Maintaining and enhancing these unique assets is important whilst protecting the amenity of residents and other uses.
- 2.45 There are a number of pubs located in the Angel and Upper Street area, many with historic and social value. They are an important part of the night-time economy of the area and will be protected.
- 2.46 Upper Street Local Shopping Area is located to the north of the Town Centre and extends up to Highbury and Islington station. It is a popular location for eating, drinking and includes a number of independent retailers.
- 2.47 The provision of new business floorspace is encouraged in Angel Town Centre, specifically on Pentonville Road, White Lion Street and upper floor locations across the Town Centre. The aforementioned Sainsbury's site also offers an opportunity for the development of new business floorspace.
- 2.48 Angel should continue to be a welcoming, inclusive, accessible and pedestrian friendly environment. New development in Angel and the spaces around it should create a high quality environment that is accessible to all residents, employees and visitors. Improvements to pedestrian access within and across the centre should be prioritised, specifically around Pentonville Road/City Road crossroads which hinders pedestrian access from St. John Street to the rest of the centre. Cycling routes which improve access to and through the area are encouraged.
- 2.49 Crossrail 2 is a proposed North-South rail link across London, with a station planned at Angel. The route is not yet funded and will not be delivered until the end of the plan period at the earliest. Any associated development should be in keeping with the character and function of the area and should prioritise public realm improvements in order to positively improve the experience of the centre. Four sites within Angel Town Centre are safeguarded to protect land needed to build and operate Crossrail 2, including land for the Crossrail 2 station itself. These sites are shown on Figure 2.5. Crossrail 2 should improve pedestrian permeability in the area and create a 24-hour pedestrian access between Islington High Street and Torrens Street through RBS building.
- 2.50 Angel Town Centre has a high number of listed buildings and is covered by eight Conservation Areas. The historic character of the area should be protected and enhanced in line with relevant policy and guidance.

Figure 2.5: Angel and Upper Street Spatial Strategy diagram



## Policy SP5: Nag's Head and Holloway

- A. Nag's Head Town Centre is an important retail area. Retail use will be maintained and enhanced within the Town Centre, particularly within the Primary Shopping Area.
- B. Increased night time economy and leisure uses will be supported in the Town Centre, particularly outside the primary shopping area and also as part of new development.
- C. Smaller scale retail provision may be acceptable in the three Local Shopping Areas that fall within the spatial strategy boundary – Cardwell Terrace, Hillmarton Terrace and part of Lower Holloway.
- D. Seven Sisters Road has some of the highest concentration of betting shops/takeaways in the borough. Further uses which add to this overconcentration will be resisted.
- E. The Holloway Prison site is a key local housing site which will help to meet identified housing need in the borough. The site will provide, inter alia, high levels of genuinely affordable housing, community uses including a women's building/centre and publicly accessible open green space.
- F. Morrison's supermarket and its adjacent car park is the key opportunity site to maximise and enhance retail floorspace in the Town Centre in the longer term. Other Town Centre uses may be appropriate as part of redevelopment of the site, including night time economy uses such as restaurants. Conventional residential accommodation will be acceptable on the upper floors, subject to amenity issues being addressed. Existing site permeability through to Seven Sisters Road and the Nag's Head market should be maintained and retail user amenity should be improved. Enhancements to the covered market will be supported where they fit with the wider function of the area. Public open space should be provided to act as a focal point for the Town Centre.
- G. Markets will be supported within the spatial strategy area, such as the weekly market on the Grafton Primary School site.
- H. New office floorspace will be encouraged to support diversity in the local economy. Conversion of upper floors above retail units to office floorspace will be considered appropriate where there are no adverse impacts on the ongoing operation of ground floor retail and safe, secure access is provided.
- I. The London Metropolitan University will continue to play an important role in contributing to the local economy. Increased space for learning will be supported. Additional accommodation for students will not be allowed other than on sites allocated for student accommodation in the spatial strategy area.
- J. Public realm and environmental improvements throughout the Town Centre will be strongly encouraged.
- K. The Seven Sisters Road, Isledon Road/Tollington Road gyratory system will be removed if feasible in the long term. A cycle route linking Camden and Tottenham

Hale along Seven Sisters Road will be supported. A junction improvement incorporating a cycle route link between Sussex Gardens to Hornsey Road will be progressed. Junction improvements to Seven Sisters Road/Holloway Road, Hornsey Road/Seven Sisters Road and Holloway Road/Tollington Road/Camden Road will be prioritised.

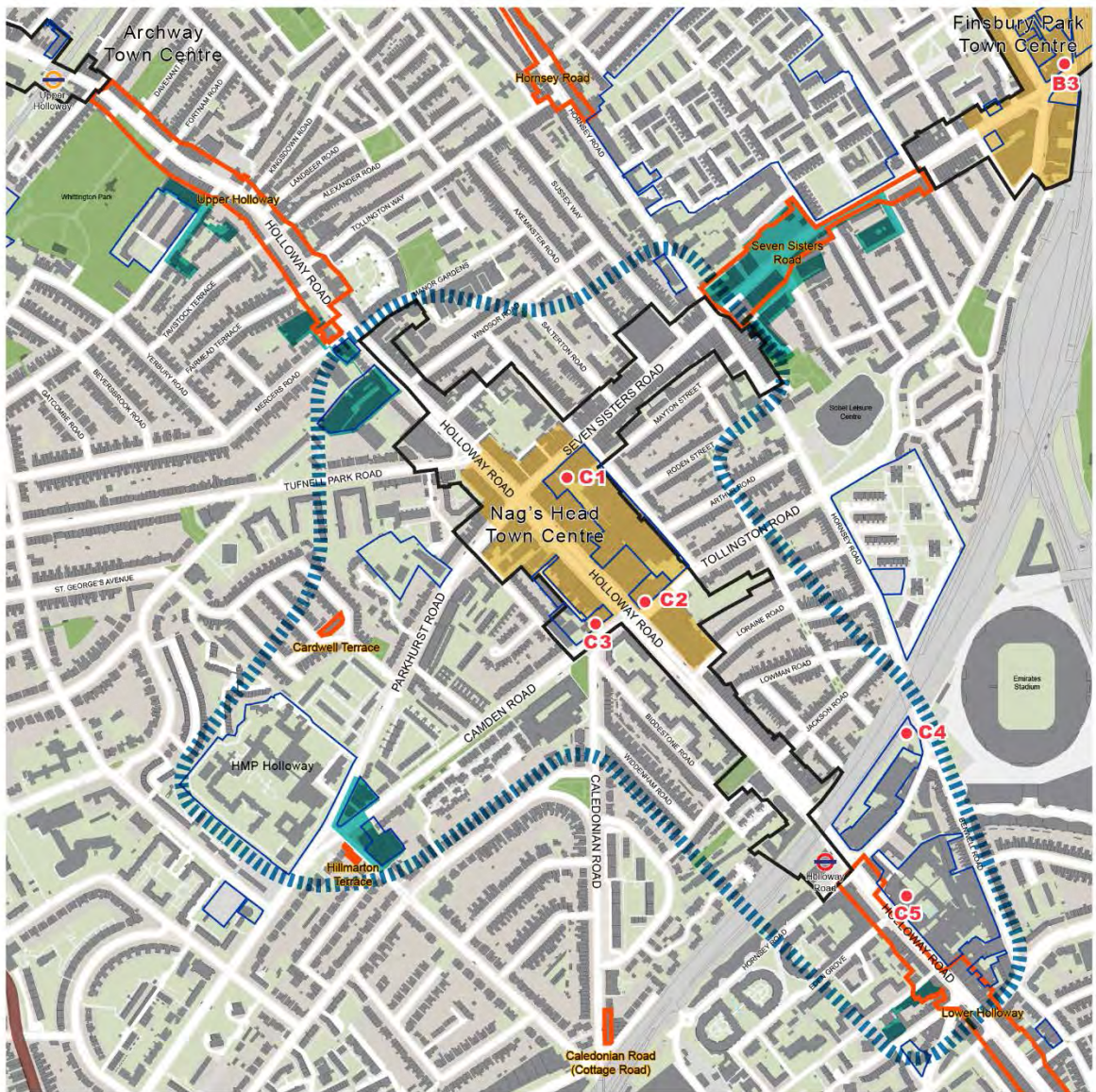
- L. The heritage assets of the area will be protected and enhanced where specific proposals come forward. The key listed buildings are the Holloway Odeon cinema and 458-462 Holloway Road. Other notable buildings include the former Jones Brothers tower and 67-83 Seven Sisters Road.
- M. Five sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.



- 2.51 Nag's Head is a busy and vibrant major Town Centre offering a range of both independent and national retailers. The Town Centre has a strong convenience (daily goods) retail offer, which meets both local residents and wider needs. It includes an indoor market and also offers a good range of comparison shops including Selby's, an independent department store. The centre specialises in fresh produce with a number of butchers, fishmongers, grocers and bakeries. There are various specialist shops, particularly outside the Primary Shopping Area (PSA), which further enriches the retail experience. The focus of A1 retail use will be in the PSA, identified on Figure 2.6.
- 2.52 Local evidence suggests that there is potential for improving the Town Centre's food and beverage offer. This could significantly increase the attraction of both daytime and night-time economies for different customers and support the wider Town Centre retail function, for example taking greater advantage of people visiting the Emirates Stadium for football matches and other events; Additional restaurants will be supported, particularly outside the PSA and as part of any Nag's Head Shopping Centre redevelopment.
- 2.53 The Nag's Head Shopping Centre is at the heart of the Town Centre and is occupied principally by Morrison's supermarket alongside a number of smaller retail units. The western part of the site fronting Seven Sisters Road includes the Nag's Head covered market, which contains a variety of retail, café and takeaway uses and adds vibrancy to the Town Centres retail and leisure offer. The shopping centre is a key development opportunity in the longer term, which could contribute towards enhancing the retail provision in the Town Centre. The existing centre could be improved; with reconfiguration to provide a better use of space with additional planting, pop-up stalls and events. The opportunity to create a significant public open space fronting Holloway Road should also be explored. Some residential uses on upper floors of any redevelopment may be acceptable, pending consistency with relevant Local Plan policies including agent-of-change.
- 2.54 The Holloway Prison site is the largest development site in the borough. The site should deliver a significant amount of new housing, with a high proportion of genuinely affordable housing. Other uses, including a women's building/centre, should also be provided. Further detail is set out in Site Allocation NH7 and in the Holloway Prison Site SPD.
- 2.55 The pedestrian link from Holloway Road through to Morrison's into the market and onto Seven Sisters Road should be improved; it would need careful design to create

an attractive and safe space for future users. The market itself should be retained with frontages improved on both the Seven Sisters Road and Hertslet Road.

- 2.56 The Islington Tall Building study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Building study (2018) and must be read alongside this spatial strategy policy. The Spatial Strategy diagram (Figure 2.6) identifies the following five sites where tall buildings (30 metres and above) may be appropriate in the Nag's Head spatial strategy area:
- 8-32 Seven Sisters Road and backland of Hertslet Road (site C1 from the study).
  - 372-376 Holloway Road (Argos and adjoining shops) (site C2 from the study).
  - 379-391 Camden Road / 341-345 Holloway Road (site C3 from the study).
  - 45 Hornsey Road (site C4 from the study).
  - Metropolitan University Tower on Hallway Road (site C5 from the study).
- 2.57 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies.
- 2.58 The adult amusement centre on the corner of Holloway Road and Seven Sisters Road in the locally listed former Nag's Head pub provides a prominent and less desirable leisure use. The unit is symbolic of the challenges faced in Nag's Head with a concentration of pawnbrokers, betting shops and money lenders. The Council supports the re-use of the prominent former pub site for a more suitable Town Centre use.
- 2.59 The nearby Emirates stadium is an important cultural and leisure attraction which helps support the wider Town Centre economy. The Emirates also features Arsenal hub community facility and Arsenal museum.
- 2.60 The A1, Holloway Road, is a heavily trafficked route which creates a major barrier dividing the Town Centre. The amount and speed of traffic creates an unsafe environment for pedestrians. The new signalled pedestrian crossing on Holloway Road and other improvements to crossing has improved the pedestrian environment, but the road remains a barrier. In the long term removing the gyratory may provide the opportunity to revise the road layout. Three other junctions afford opportunity for design improvements to improve safety for pedestrian crossings and improved cycling routes. These are the junction between Seven Sisters Road and Hornsey Road, the junction between Seven Sisters Road and Holloway Road and the junction between Tollington Road and Holloway Road. More generally, public realm improvements could include reducing street furniture clutter, co-ordination of cycle parking and further street planting along Seven Sisters Road. Public realm interventions, including public art and signage, which reinforce the distinctiveness and unique features of Nag's Head will be supported.
- 2.61 The Town Centre has a number of architecturally and historically interesting buildings including a variety of styles from Victorian, through to post-war period. Conservation areas run along and adjacent to Holloway Road including the Odeon Cinema with small incursions into the edge of the Town Centre. Investment in the Odeon cinema and its frontage along Holloway Road is planned.

Figure 2.6: Nag's Head and Holloway Spatial Strategy diagram





  
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- |   |                                    |   |                              |
|---|------------------------------------|---|------------------------------|
|  | Nag's Head Key Area                |  | Priority Employment Location |
|  | Site Allocation                    |  | Designated open space        |
|  | Potential site for a tall building |  | Borough boundary             |
|  | Town centre                        |   |                              |
|  | Primary Shopping Area              |   |                              |
|  | Local Shopping Area                |   |                              |

## Policy SP6: Finsbury Park

- A. Finsbury Park is a District Town Centre with a Primary Shopping Area covering Fonthill Road and parts of Stroud Green Road, Blackstock Road and Seven Sisters Road. A diverse range of shops within the area should be maintained, so that the overall retail offer can cater for the needs of different sections of the community.
- B. Development in the Town Centre should maintain the predominant commercial role of the area, with specific focus on retail and services on ground floors. These uses should be directed to the Town Centre in the first instance, then the Seven Sisters Road Local Shopping Area.
- C. The Specialist Shopping Area at Fonthill Road is a unique agglomeration of specialist clothing stores which adds significant value to the character and vitality of the Town Centre and wider area. This specialist shopping role should be strongly protected and enhanced.
- D. Finsbury Park has potential to develop as a CAZ satellite location for additional B-Use Class uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In order to realise this potential, diminution of B1, B2 and/or B8 uses will be resisted and further intensification of these uses, particularly units suitable for SME occupation and B1(c) 'maker space', will be strongly encouraged.
- E. In principle, residential development will generally only be suitable on upper floors in the Town Centre. However, acceptability on upper floors will be judged on a case-by-case basis, factoring in the need to conserve sufficient ancillary space to allow for commercial uses to continue to operate successfully.
- F. Development of a street market will be supported where it can be demonstrated that such expansion will enhance the vitality and viability of the area, particularly on Fonthill Road.
- G. Finsbury Park has a rich offer of community uses and cultural spaces, which reflect its diverse and vibrant community. Development within Finsbury Park should seek to protect and enhance this community-based cultural and entertainment offer.
- H. Leisure and night-time economy uses are a strong feature of the area, with a particularly distinct food scene. Strengthening the role of the area as a food destination is supported. Additional leisure and night-time economy uses should be directed to the Town Centre. Development proposals must ensure that adverse amenity impacts are prevented/mitigated.
- I. Music venues are synonymous with the character of the area. Existing venues will be strongly protected and development of new music venues is supported.
- J. Finsbury Park is the busiest transport interchange in London outside Zone 1. New tunnels will connect the Thameslink service from Finsbury Park to London St. Pancras and provide increased connectivity to the wider South East of England. In order to absorb this increased rail capacity, the council will work with relevant stakeholders - including Transport for London - to identify further improvements to make the station fit for purpose; this should include fully step-free access. Options

for enhancement/redevelopment of the station should explore options for intensification of development above the station.

- K. Development should contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors. New development should provide good connectivity for pedestrians and cyclists and should improve permeability and legibility within and across the Town Centre. In particular, access to retail areas such as Fonthill Road and to Finsbury Park itself should be improved.
- L. Joint working with Transport for London will be undertaken to improve the pedestrian environment along Seven Sisters Road. There will be improved walking and cycling routes through the Finsbury Park area to Highbury Corner linking with wider routes into central London, to encourage walking and cycling for local residents, London Metropolitan University students and visitors to the Emirates Stadium.
- M. The area's key heritage assets include the Grade II\* listed former Rainbow Theatre and the Grade II listed Church of St Mark with St Anne, which contribute significantly to Finsbury Park's character and townscape and will be protected and enhanced.
- N. Four sites in the Spatial Strategy area have been identified as potentially suitable for tall buildings over 30 metres.

2.62 Finsbury Park is a busy, multi-cultural area with cafes and shops that reflect this diversity. The wider area falls within the administrative boundaries of the London Boroughs of Islington, Haringey and Hackney and the council will work jointly with these boroughs to deliver a coordinated approach. Development in this area should contribute towards creating more inclusive local economy, which supports small and independent business, and increases jobs opportunities for its diverse local community wherever possible.

2.63 Finsbury Park is a District Town Centre and its predominant commercial role should be maintained. A diverse range of shops within the area should be maintained, so that the overall retail offer can cater for the needs of different sections of the community, including the least well off residents in the area. The Primary Shopping Area seeks to secure a vibrant and viable A1-use retailing Town Centre core. However, the overarching commercial role of the area is changing from traditional retailing to more leisure and experience-based retailing.

2.64 New commercial development should be directed to Town Centre. The Seven Sisters Road Local Shopping Area joins Nag's Head and Finsbury Park Town Centres; the retail offer in this part of the area is less concentrated than the designated Town Centres, but opportunities for enhancing commercial activity should be explored in line with the sequential approach.

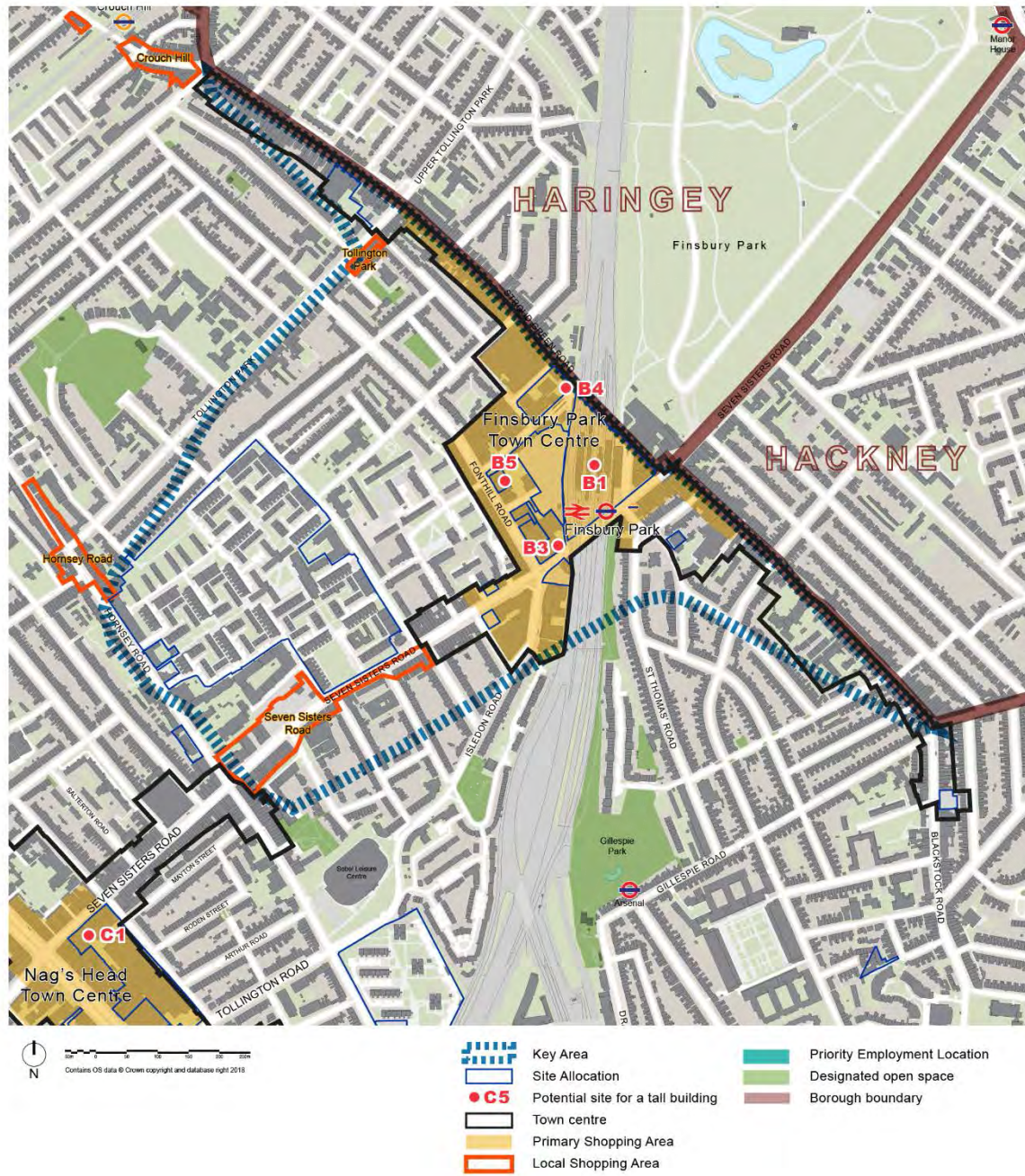
2.65 Nag's Head is the closest Town Centre to Finsbury Park and is designated above Finsbury Park in the retail hierarchy as a Major Town Centre. Despite their proximity and high inter-accessibility, evidence shows that they are distinct centres with different characters and opportunities for future development and functions, as well attracting different catchments of shoppers. However, establishing strong commercial identities in both Finsbury Park and Nag's Head Town Centres with commercial activity between them may bring mutual benefits such as additional footfall.



- 2.66 Fonthill Road is designated as a Specialist Shopping Area due to its important and widely recognised fashion cluster, which contributes significantly to Finsbury Park's character and vitality. All development must contribute or complement the specialist function of Fonthill Road, in line with Policy R7. Fonthill Road used to be a successful garment manufacturing hub although the manufacturing element has fallen into decline over the past thirty years. The council will work with traders and partners to reinvigorate manufacturing and workshop functions on Fonthill Road to enhance its uniqueness and create a sustainable commercial environment that allows traders here to continue running viable businesses. This may include provision of B-Use floorspace above shops.
- 2.67 Finsbury Park has significant potential to develop as a unique satellite location, outside the CAZ, for additional B-Use Class uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. In developing this potential location, the focus should be on promoting and enhancing the nascent fashion, tech and creative industries through provision of units suitable for SME occupation and B1(c) space, particular 'maker space', as well as affordable workspace where appropriate. Ensuring adequate provision of such spaces in Finsbury Park will enable opportunities for the establishment of a mix of dynamic, sustainable local businesses.
- 2.68 Residential development will generally be resisted in the Town Centre on ground floors or below in order to retain the predominant commercial function of the Town Centre. Residential uses on upper floors in the Town Centre may be acceptable, dependent on the need to conserve sufficient ancillary space to allow for commercial uses to continue to operate successfully.
- 2.69 Finsbury Park has a rich community cultural offer with third sector organisations such as Muslim Welfare House, Outlandish, the Jones Art Building and Park Theatre. Development should seek to contribute and complement the existing community cultural infrastructure.
- 2.70 Leisure uses such as bars, pubs and theatres are synonymous with the cultural fabric of an area and provide formal and informal spaces alike to collaborate and share cultures. The council will support proposals for cultural and leisure uses in the Town Centre which reflect the culturally diverse local identities. A particular feature of the area is its distinct food scene, including a wealth of restaurants catering for North African and East African cuisine. Expanding this food offer and strengthening Finsbury Park's role as a food destination is supported.
- 2.71 The night-time-economy has potential to be improved in Finsbury Park. The London Plan identifies Finsbury Park as an area where the night-time economy is more than locally significant. Additional night time economy uses should be directed to the Town Centre. Development proposals must ensure that adverse amenity impacts are prevented and/ or mitigated.
- 2.72 Music venues cater to different demographics, foster social interaction and support established and fledgling musicians. Finsbury Park currently has a limited number of music venues, but has a rich heritage of past venues such as the Rainbow Theatre and site of the former George Robey Pub. Increased provision of music venues is supported, including through the introduction of a live music offer at existing venues such as pubs that may not currently have a music offer. An increase in music venue provision will help Finsbury Park enhance a positive identity that will increase the vibrancy and appeal for residents and visitors alike.

- 2.73 Finsbury Park station is the busiest transport interchange in London outside Zone 1, providing links to central and north-east London on the Piccadilly and Victoria underground lines, and train services to King's Cross/St Pancras and the City southwards, and to Cambridge and Stevenage northwards. Improved connectivity via the Thameslink service now also links Finsbury Park to the wider South East of England.
- 2.74 To manage the intensification of services at Finsbury Park station and the associated increase in passengers, improvements to capacity, the introduction of step free access and a larger station entrance from Wells Terrace are all underway. The council envisage the need for complete redevelopment of the station in the future to truly be a 21<sup>st</sup> century station that can cope with increasing capacity demands. The council will liaise with partners including Transport for London (TfL) and the GLA to identify further improvements possibilities.
- 2.75 The station and the area around it can be congested at peak times and are restricted by the railway bridges and road layout. Access to existing commercial areas, such as Fonthill Road, can be difficult because of this. The council will, through its continued working with stakeholders and the adjoining boroughs of Hackney and Haringey, seek extensive redevelopment in the area immediately surrounding Finsbury Park station to improve the station's permeability and legibility, and make access to these facilities safer and more inclusive, including for people with disabilities.
- 2.76 The Islington Tall Building study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Building study (2018) and must be read alongside this spatial strategy policy. The Spatial Strategy diagram (Figure 2.7) identifies the following four sites where tall buildings (30 metres and above) may be appropriate in the Finsbury Park spatial strategy area:
- Finsbury Park Station (site B1 from the study).
  - 221-233 Seven Sisters Road, corner with Fonthill Road (site B3 from the study).
  - Wells Terrace East, Morris Place East, Yellow Car Wash site (site B4 from the study).
  - 113-119 Fonthill Road and land to rear (site B5 from the study).
- 2.77 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies.

Figure 2.7: Finsbury Park Spatial Strategy diagram



## Policy SP7: Archway

- A. Development in Archway should support the commercial function of the area, particularly the retail function of the Town Centre. Junction Road and Holloway Road act as the 'high street' within the Town Centre and further development of retail uses here, including essential services, is encouraged.
- B. The council will support Archway Town Centre's role as a cultural quarter where existing cultural uses will be protected. Opportunities to further develop and enhance the cultural offer in the Town Centre should be pursued as part of all relevant development proposals.
- C. The continued operation of Archway market is supported. Expansion of the market (in terms of size or frequency of its operation) will be supported where it can be demonstrated that such expansion will enhance the vitality and viability of the spatial strategy area, particularly the Town Centre; and where there will be no adverse impacts on Navigator Square.
- D. Archway Tavern is a historic feature and a focal point of the Town Centre. The council supports the continued lawful public house use and will resist any change of use.
- E. Night-time economy uses should be directed to the Town Centre. Such uses will only be supported where adverse amenity impacts are prevented/mitigated, particularly in relation to uses which intend to serve alcohol.
- F. Existing business floor space will be protected and proposals that result in a net loss of business floor space in the Town Centre will be resisted. Development proposals for new business floorspace, particularly SMEs and/or B1c floorspace which supports the areas cultural offer or other local institutions such as the Whittington Hospital, will be encouraged.
- G. Improvements to Archway station are supported, including entrance level accessibility improvements and provision of active frontages. New retail units should be provided as part of station entrance improvements and, where appropriate, active frontages should be provided on Junction Road and Navigator Square.
- H. The Upper Holloway and Highgate Hill Local Shopping Areas complement the Town Centre, providing accessible local services for residents in the mainly residential areas surrounding the Town Centre. Smaller-scale retail development is encouraged within these LSAs.
- I. Residential development is considered acceptable on sites allocated for this purpose and on upper floors across the Town Centre where it does not adversely impact the commercial function of the centre and ensures that the ability of commercial uses in the area to operate effectively is not compromised.
- J. It is anticipated that St Pancras Mental Health Hospital (which is currently located in King's Cross) will be moving to part of the site currently occupied by the ancillary buildings of Whittington Hospital. This will provide an important social infrastructure use in the Archway Spatial Strategy Area and in the borough as a whole.

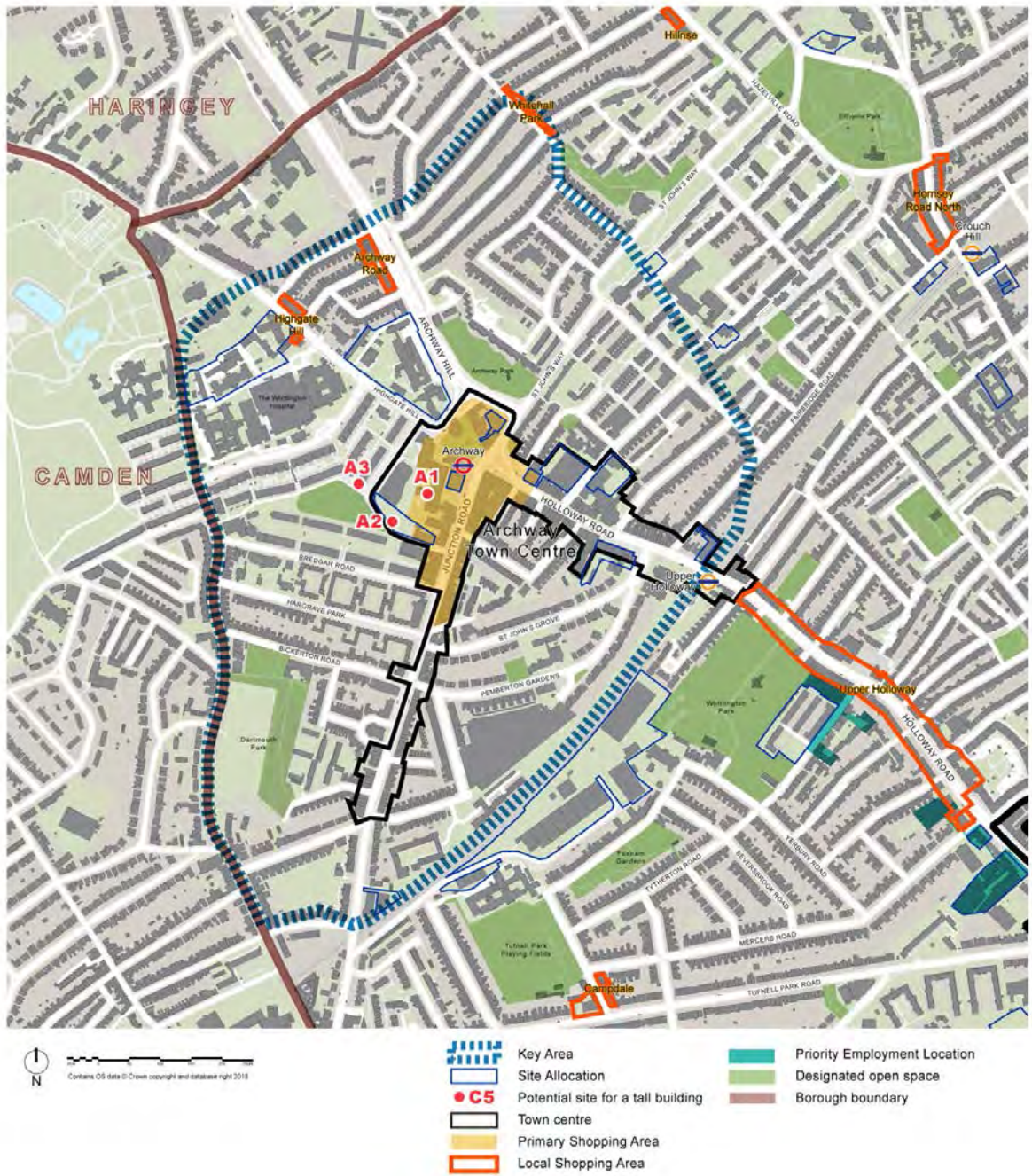
- K. The Council will promote and support the use of the new public open space, Navigator Square, for public events, where there are no adverse impacts on its key open space function.
- L. Public realm and road safety improvements along Junction Road will be encouraged. Development should contribute to the creation of a high quality environment that is accessible to all residents, employees and visitors, including through improvement of public transport capacity and experience. New development should provide good connectivity for pedestrians and cyclists, and good permeability through sites (where relevant).
- M. Three sites in the spatial strategy area have been identified as potentially suitable for tall buildings over 30 metres.

- 2.78 Archway is a District Town Centre located in the north west of the borough at the intersection of five roads: Holloway Road, Highgate Hill, Junction Road, Archway Road and St John's Way. The heart of the centre is focused around Archway Underground Station and Navigator Square, a new public open space. The centre is dominated by a modernist complex of three high-rise towers (the "core area"). Residential areas lie to the north and east. The area benefits from two green spaces; Girdlestone Park and Archway Park.
- 2.79 The area includes a variety of uses of different scales including large social infrastructure uses at Whittington Hospital and Archway Campus; a significant retail and leisure offer within the Town Centre, complemented by Local Shopping Areas; and other commercial uses, particularly offices and workspaces.
- 2.80 There is a growing reputation for culture in Archway, which is a designated cultural quarter. The area currently has a diverse cluster of community-led arts, culture organisations and music venues, providing a dynamic, inclusive cultural offer; this varies from the annual cultural events such as the Archway with Words Festival, to important art and drama venues such as Kogan Academy and Central Saint Martins.
- 2.81 It is vital that the Town Centre secures cultural facilities that are suitable, attractive and affordable, in order to further enhance Archway's reputation as a cultural destination, with a diverse locally-inclusive arts scene. The Methodist Hall, adjacent to the multi-use outdoor public space at Navigator Square, could provide a cultural hub for the Town Centre. Similarly, the Archway Tavern could be revitalised to complement other music venues in the area.
- 2.82 Archway accommodates a number of quality independent retailers which concentrate along Junction Road and Holloway Road. The area's retail function should be maintained and enhanced, utilising the opportunities for increased footfall derived from the recent public realm improvements as part of the gyratory removal scheme.
- 2.83 The primary shopping area identified on Figure 2.8 will remain the focus of A1 retail use with a range of other uses promoted elsewhere in the Town Centre. Archway is identified as a night-time economy of more than local significance; the area has potential for expansion of night time economy uses, dependent on mitigation of any adverse impacts, particularly noise and disturbance for residents and businesses.
- 2.84 Archway Market could have an expanded role in order to diversify and extend the Town Centre's offer and attract new visitors to the area. In this regard, the market

could benefit from more frequent operation, although such expansion would need to demonstrate that impacts on Navigator Square are prevented or mitigated.

- 2.85 Proposals for business floorspace, particularly where it supports the areas cultural offer or other local institutions, will be supported in suitable locations within the spatial strategy area, including the designated Priority Employment Location and within the Town Centre (directed to upper floors). Proposals resulting in the net loss of business floorspace will be resisted in line with relevant Local Plan policy.
- 2.86 Archway Town Centre should be a welcoming, inclusive, accessible and pedestrian friendly environment. Development proposals are expected to be of a high quality and improve the public realm in and around the centre. The gyratory removal project has delivered a new public space in the heart of the Town Centre, including a new two-way traffic system and improved pedestrian and cycling facilities. The replacement of the gyratory with a new public space, Navigator Square has removed barriers to movement which previously severed the Town Centre, enabling far better pedestrian access to shops and services.
- 2.87 The quality of the environment around and within the core area is generally poor, particularly Archway Mall. The council will encourage further improvements to this part of the Town Centre and work with the landowners to carry out beneficial redevelopment.
- 2.88 The Islington Tall Building study (2018) thoroughly assessed the borough's potential to accommodate the development of new tall buildings. Policy DH3 has been informed by the Islington Tall Building study (2018) and must be read alongside this spatial strategy policy. The Spatial Strategy diagram (Figure 2.8) identifies the following three sites where tall buildings (30 metres and above) may be appropriate in the Archway Spatial Strategy area:
- Hill House (site A1 from the study).
  - Vorley Road Bus Station (site A2 from the study).
  - Southern end of Macdonald Road, opposite Archway Leisure Centre (site A3 from the study).
- 2.89 Any proposal for tall buildings on these sites must be fully consistent with Policy DH3 and all other relevant policies.

Figure 2.8: Archway Spatial Strategy diagram



## Policy SP8: Highbury Corner and Lower Holloway

- A. Highbury Corner is a key transport node in Islington. Significant transport improvements are being delivered to improve the pedestrian, cyclist and road networks in the area, particularly around the station. The council will continue to work with Transport for London to make Highbury Corner safe and accessible for all users, primarily through the delivery of an ongoing transformation project at Highbury Corner Roundabout which includes:
- (i) closing the western arm of the roundabout to create a new public space, which includes Highbury & Islington Station forecourt and part of the arboretum (with the remainder of the arboretum to remain closed off);
  - (ii) improving pedestrian crossings, which will allow pedestrians to move around the area more safely and directly, and will improve access and permeability to the surrounding area, including Highbury Fields; and
  - (iii) introducing a dedicated, segregated cycle lane associated with the new public space, to help reduce the risk of conflicts and to make cycling safer.
- B. There may be an opportunity to improve/redevelop the current station, with the potential to deck over the existing railway lines and build above the tracks. Any redevelopment would need to integrate seamlessly with the newly created public space, which will be safeguarded from redevelopment. Mixed-use development would be appropriate and active ground floor uses encouraged on those parts of the site fronting onto Highbury Corner and Holloway Road. Office use is also encouraged above the station.
- C. The local shopping areas of Lower Holloway Road, St Paul's and Upper Street are the main retail centres within the spatial strategy area. The existing retail and service function of these area should be maintained and enhanced.
- D. Existing business uses will be protected, and the development of new business floorspace encouraged, in the Highbury Corner Spatial Strategy area, particularly within Priority Employment Locations. Space which meets the diverse needs of the SME economy, including secondary space, studios, business centres and co-working space, is supported.
- E. Cultural and night time economy uses will be protected. The Garage and the Union Chapel are of more than local significance, and retention of these uses is a strong priority.
- F. The historic character of the Highbury Corner and Lower Holloway area will be protected and enhanced, with high quality design encouraged so that it respects the local context. Views of the Union Chapel - a key heritage asset and designated Local Landmark - will be protected.
- G. Highbury Fields – which lies just outside the Spatial Strategy area - is the largest open space in the borough, and one of only two designated pieces of Metropolitan Open Land. The function of Highbury Fields will be strongly protected. Development in close proximity to Highbury Fields should preserve and enhance this unique asset, including views to and from the open space.



- 2.90 Highbury and Islington station is the focal point of the Highbury Corner and Lower Holloway Spatial Strategy area; Figure 2.9 shows the boundary of the area. The station is a busy transport hub served by London Underground, London Overground and National Rail lines. Key bus routes also operate through the area. It is in close proximity to Highbury Fields to the north and Upper Street to the south. The area is currently dominated by a busy one-way traffic system, and there is often significant congestion along the A1, which connects Angel to Holloway Road and beyond.
- 2.91 It has been a long term aspiration of the council to improve the pedestrian, cyclist and road networks at Highbury Corner. The environment around Highbury Corner has generally of poor quality. Vehicular domination of the public realm, congested footways and unsafe cycle routes have led to a consistently poor pedestrian experience over a number of years. Significant work to improve this area is underway. Proposed improvements include removing of the current one-way system, partially opening the arboretum as part of a new pedestrianised public open space, and introducing a two-way traffic system, as well as various pedestrian crossing and cycle improvements.
- 2.92 There is redevelopment potential at Highbury and Islington station. The site is allocated for redevelopment of existing buildings, with potential to deck over the existing railway lines and build over the tracks. The station should be retained and any redevelopment should safeguard the newly created public square and include ground floor retail uses onto the square, Highbury Corner and Holloway Road. Offices uses above the station will be supported.
- 2.93 Aside from being a key transport hub, the area has a number of other functions. It accommodates the Local Shopping Areas of Lower Holloway and St Paul's Road, and part of Upper Street Local Shopping Area. The area also includes several Priority Employment Locations. To sustain the commercial function of the area, loss of retail and office floorspace will be resisted, and new retail/office space will be encouraged.
- 2.94 The function and role of existing cultural uses should not be diminished or put at risk by any proposed development. The spatial strategy area features several significant cultural destinations, such as the Hen and Chickens Theatre Bar, the Garage and Union Chapel.
- 2.95 The Garage live music venue is a significant cultural destination. Where the Garage forms part of a redevelopment proposal, it must be re-provided and continuity of operation must be ensured, i.e. the re-provided venue should be operational before the Garage cease to occupy their existing site. The Union Chapel, which is a working church and also a performance space which provides a diverse programme of arts experiences, will also be safeguarded through this policy.
- 2.96 Highbury Corner has retained much of its historical character and is covered by a number of conservation areas, listed buildings and heritage assets, including the Union Chapel. This historic character should be enhanced and maintained and local views towards Union Chapel should be maintained.

Figure 2.9: Highbury Corner and Lower Holloway Spatial Strategy diagram



# 3 Thriving Communities

## Policy H1: Thriving communities

- A. Islington should continue to be a place where people of different incomes, tenures and backgrounds can live in mixed and balanced communities which are economically, environmentally, and socially healthy and resilient. All new housing development should be fully integrated within, and relate positively to, its immediate neighbours and locality. Gated development is not suitable, as it isolates and compartmentalises communities.
- B. All new housing must contribute to the delivery of all Local Plan objectives, including with regard to making the borough a fairer place through the delivery of the right type of housing that meets identified needs.
- C. Islington support high density housing development. Proposals which include housing should make the most efficient use of land to ensure that the optimal amount of housing is delivered, while having regard to other Development Plan policies and the specific site context. Proposed developments which result in the reduction of land supply which could reasonably be expected to be suitable for conventional housing, and would therefore threaten the ability to meet housing targets, will be refused.
- D. High quality new homes are integral to achieving the aim of making the most efficient use of land and improving quality of life of residents. Homes should be designed as a place of retreat and as such should contribute to improving the health and wellbeing (both physical and mental health) of residents.
- E. Delivery of genuinely affordable housing is a key priority of the Local Plan. The overarching strategic target over the plan period is for 50% of all new housing to be affordable.
- F. The tenure split between social rented and intermediate affordable housing on all schemes must prioritise forms of affordable housing which is genuinely affordable for those in need.
- G. Islington will continue to seek affordable housing contributions from small sites (less than 10 net additional units) to fund the development of affordable housing in the borough, including council-led housing developments.
- H. Islington is committed to meeting and exceeding the boroughs minimum housing delivery target as set out in the London Plan.
- I. The council will maintain a supply of housing land to meet housing targets over the plan period, with a particular focus on demonstrating a five year supply of land.

- J. The size mix of new housing should reflect local need, with priority for units suitable for families.
- K. Conventional residential accommodation must be designed to meet a variety of needs throughout its lifetime. Various forms of specialist housing are necessary to provide support to specific groups of vulnerable people and those at risk.
- L. Housing needs for older people will predominantly be met through conventional housing. In exceptional circumstances specialist accommodation for vulnerable older people may be required.
- M. The provision of additional student accommodation will only be permitted on allocated sites and will be expected to provide a high standard of amenity. Proposals on allocated sites will be expected to provide funding for bursaries for students as a priority, and affordable student accommodation.
- N. Purpose Built Private Rented Sector development will be resisted unless conventional housing is considered undeliverable. Any Purpose Built Private Rented Sector development will be required to provide genuinely affordable housing, and adhere to standards which aim to secure high quality housing. The so-called 'Distinct Economics' of this type of accommodation is not in itself justification to circumvent policy requirements.
- O. Self-build and Custom build housing will be supported on suitable sites, where compliant with other relevant housing policies.
- P. The council will support the provision of new supported housing, where there is an identified need, and will resist the loss of existing supported housing.
- Q. Existing good quality Houses in Multiple Occupation (HMO) will be protected. Large-scale HMOs – such as co-living schemes - will be refused as they are not considered to make the best use of land and undermine efforts to deliver affordable housing and other land use priorities of the Local Plan.
- R. The council will consider allocation of sites for Gypsy and Traveller accommodation where there is a defined need in the borough, and in consultation with neighbouring boroughs.
- S. Islington will support the retention and development of social and community infrastructure necessary to support the borough's residents, workers and visitors; designed to be high quality appropriate to specific needs and requirements of the use and users; and located in places that are accessible, safe and convenient for people of all ages that use them.
- T. Existing play space will be protected and new play space will be sought as part of development. This should meet the needs of children and young people of all ages and abilities. Provision of incidental playspace and the creation of playable environments, as part of building/public realm design, adds a further important element of play.
- U. The health of communities is a very important consideration as part of new development. Health Impact Assessments will be required in order to assess how new development will affect the health of local communities.

- 3.1 Islington's residential population is expected to increase significantly over the plan period. The challenges associated with housing additional residents are significant; not only do we have to contend with constraints on land availability, in the most densely populated and third smallest (by land area) English local authority area, we also face acute affordability issues which means that a simple 'supply and demand' model of housing delivery will not address the needs of our growing population.
- 3.2 Islington's overall housing need is derived from the London-wide Strategic Housing Market Assessment (SHMA). The London SHMA 2017 sets out an overall housing need figure for London, some 66,000 additional homes per annum. The Islington SHMA identifies a borough-level housing need of 23,000 dwellings over the period 2015 to 2035, or 1,150 dwellings per annum; the majority of this need is for genuinely affordable housing.
- 3.3 In areas covered by spatial development strategies (such as London) the NPPF and PPG allow for the elected Mayor to distribute the total housing need figure across the plan area, in this case the strategic need figure for the entirety of Greater London. In London, the distribution of strategic housing need is done through the Strategic Housing Land Availability Assessment (SHLAA).
- 3.4 A housing need figure is not in itself a housing target. Through the SHLAA process, boroughs establish available housing capacity, which then informs actual local level housing targets. The SHLAA process has highlighted that there is dwindling capacity for new residential development in Islington, insufficient to meet local housing need.
- 3.5 In order to meet our housing targets, and because of the aforementioned issues with new capacity for housing, it is important that existing housing is protected, and that land which could reasonably be expected to be suitable for new housing is not developed for other uses; this includes reduction of housing units from extant permissions not yet built out.
- 3.6 The London SHMA figure relates to overall housing need. However, Islington consider that provision of genuinely affordable housing is the single most effective measure that could help to truly address housing need in Islington. Islington's local SHMA 2016 identifies that over half of projected housing need in Islington is for affordable housing at or below social rents.
- 3.7 In addition, the Islington SHMA highlights a need to provide a range of affordable housing products, particularly intermediate rented products, to address the current imbalance in the Islington housing market, whereby only a small percentage of households can afford market rent based on a sensible gross income affordability benchmark (30% of gross income on housing costs).
- 3.8 However, housing policies, particularly affordable housing requirements, must have regard to development viability. The viability study underpinning the Local Plan shows that 50% of affordable housing can viably be delivered in the plan period.
- 3.9 New housing across all tenures must be of the highest quality, in accordance with the Local Plan objectives and detailed design policies. Meeting housing need through the provision of sub-standard housing would be a pyrrhic victory and would be at odds with the idea of planning for sustainable development. It would create further substantial problems that would need to be addressed by future plans and strategies and would not be good planning. This Local Plan seeks to deliver new housing to meet local housing need, but this should not be at the expense of housing quality.

- 3.10 The need for new housing in the borough is significant, particularly the need for genuinely affordable housing as demonstrated by local evidence. The Islington SHMA identifies a minimum need of 12,300 affordable dwellings between 2015 and 2035, but this does not factor in households spending large proportions of their income on rent who may also need more affordable dwellings. The most telling statistic in the Islington SHMA is that only 15% of households can afford market rent based on spending 30% of their income on housing costs; the remaining 85% of households will therefore need some form of rent subsidy/assistance in order to meet their housing costs.
- 3.11 However, it is important to note that the ultimate delivery of housing is something that is largely outside the council's control, notably on private development sites, as there are limited powers to force build-out once planning permission is granted.
- 3.12 At the macro-economic level, the financialisation of housing and the idea of a home as a commodity, coupled with Government focus on demand-side economic interventions, has played a much greater role in exacerbating the 'housing crisis' than a simple lack of building enough homes. In Inner London, and Islington in particular, where land availability for development is scarce, demand-side measures have played a large role in increasing unaffordability. Only when these macro issues are resolved, and where proper focused supply-side measures (such as freeing up councils to build housing, and focusing grant funding on delivery of housing tenures which meet defined need not aspirations) are put in place can a true picture of the housing market be ascertained. This is beyond the power of Islington Council, but it is important to understand these issues when planning for the future of Islington, to ensure that some realism is factored into planning for housing in particular and ensure that other development needs – as it is important to provide land to meet other development needs - are not overlooked.
- 3.13 Housing is not just a place for individuals and families to live; it can also deliver a specialist function (e.g. through design) to meet specific local housing needs. Islington's Housing Strategy aims to increase support and choice for vulnerable older people around housing options; increase levels of independence for people in need through improved housing opportunities and conditions and provide a better quality of life for some of the boroughs most vulnerable residents.
- 3.14 Islington faces an extreme set of circumstances when it comes to need and land supply. Land supply in Islington is constrained; the borough is the most densely populated and third smallest (by land area) English local authority area. Local evidence demonstrates that the need for new housing in the borough is significant, particularly the need for genuinely affordable housing. The borough faces an acute affordability issue which means that a simple 'supply and demand' model of housing delivery will not address the needs of our growing population. In this context land supply for conventional housing and genuinely affordable housing are considered the top priority because they are the most sustainable use of land in Islington.
- 3.15 Given the shortage of land, certain specialist forms of housing, including purpose-built student accommodation, large scale HMOs and purpose built private rented sector housing, are not considered the most appropriate use of the land that is available (in terms of maximising uses which deliver the objectives of the Local Plan), and will generally be resisted. In addition, conventional residential development is by far the most sustainable form of residential development as it meets the broadest spectrum of housing need. Many people can live in conventional residential units (even where units require adaptation), whereas specialist forms of housing cater to specific groups. The future need for such specialist forms is untested as they are relatively new products,

unlike conventional residential units which are a tried and tested method of meeting a broad spectrum of need over decades.

- 3.16 Supported housing can take many forms and helps to meet the needs of those people unable to live independently or those who are at risk or vulnerable are met. Provision of new supported housing which meets such needs will be supported.
- 3.17 The adaptation of conventional housing can provide for the vast majority of peoples needs, reducing the need to move homes and the need for specialist accommodation. Specialist housing for older people – such as extra care housing - will not usually be supported by the Council. This form of specialist housing often has excessive communal space which add to the cost of the provision, leading to reduced affordable housing and less than optimal use of land. However, specialist affordable housing for vulnerable older people with significant care needs may be appropriate in certain circumstances.
- 3.18 The council is supportive of self-build and custom housebuilding in principle, but acknowledge that the highly urbanised context, the constrained land supply and high land costs in the borough, combined with a need for efficient use of sites, make delivery challenging.
- 3.19 Social and community infrastructure uses, such as hospitals, doctors' surgeries, nurseries, schools, leisure centres and sports facilities, libraries, community centres and recreational and play spaces are vital for the creation and maintenance of strong, vibrant and healthy communities. Ensuring new development is supported by a suitable level of social and community infrastructure is important not only for the quality of life of residents in new developments, but also for the existing population who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in Islington through the redevelopment of existing facilities.
- 3.20 New development will be required to contribute to the borough's sense of social, mental and physical wellbeing by supporting social and community infrastructure provision. This may involve financial contributions secured through CIL or on-site provision at larger developments secured through planning obligations. Further information on infrastructure and financial contributions secured through CIL or planning obligations is provided in the strategic infrastructure section and the Planning Obligations (Section 106) SPD.

## **Policy H2: New and existing conventional housing**

- A. Islington aims to meet and exceed the housing target of 7,750 units by 2028/29, which equates to an annualised target of 775 per annum
- B. Development proposals involving new housing – regardless of site size - must demonstrate that use of the building/site is optimised. Particular consideration should be given to:
- (i) the contribution to meeting need for particular types of housing;
  - (ii) the contribution to meeting the borough's housing targets;

- (iii) the level of housing density;
  - (iv) social and strategic infrastructure requirements and impacts on existing and/or planned infrastructure; and
  - (v) interaction with other policy priorities, including the provision of new business floorspace to meet projected jobs growth and sustainable, inclusive design measures.
- C. The loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced by at least equivalent floorspace and does not involve the net loss of more than one unit. Conversion of two or more units into a single dwelling is considered material and would require planning permission.
- D. All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2.
- E. Concentrations of one-bedroom units – overall and as part of constituent market and affordable elements of a proposal - will not be acceptable.
- F. Studio and bedsit units will not be permitted unless all of the following exceptional circumstances are demonstrated:
- (i) Studios/bedsits would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements;
  - (ii) The delivery of a larger unit is not possible; and
  - (iii) Provision of studios/bedsits would result in a higher quality dwelling in accordance with relevant design policies, particularly relating to levels of daylight and sunlight.
- G. To maintain a supply of larger family homes, the conversion of residential units into a larger number of self-contained units will only be permitted where:
- (i) The total floor area of the existing dwelling is in excess of 125sqm GIA;
  - (ii) The total number of new homes resulting from the conversion is optimised in line with the housing size mix priorities; and
  - (iii) The dwelling mix does not contain any studio/bedsit units or more than one one-bedroom unit.
- H. All residential developments of 20 units and over are required to enter into a Section 106 legal agreement to ensure that all residential units will be occupied, to prevent wasted housing supply.

3.21 Working in conjunction with the Greater London Authority (GLA) and other London boroughs through the London SHLAA process, Islington have derived capacity for 7,750 additional new homes by 2028/29<sup>1</sup>. This gives an annual minimum housing

<sup>1</sup> It is expected that the housing target will be revised prior to 2028/29, either through a review of the Local Plan or London Plan, but for avoidance of doubt, the annual target of 775 units will be rolled over after 2028/29 if no revision has taken place. The Islington housing trajectory (produced at least annually) will assume an annual target of 775 for years after 2028/29.



target of 775 new homes per annum. These figures are identified in the draft London Plan published in December 2017.

3.22 The housing target is made up of a large sites and small sites component<sup>2</sup> (shown in table 3.1 below) but the aim of the policy is achievement of the overall target, rather than meeting each constituent part.

**Table 3.1: Draft London Plan (2017) housing target**

	<b>Annual target</b>	<b>Total target 2019/20 to 2028/29 (10 years)</b>
Small sites benchmark	484	4,840
Large sites benchmark	291	2,910
Total housing target	775	7,750

3.23 To meet the overall housing target, the Local Plan sets out a number of allocations on sites where new housing development is expected to come forward over the plan period. The majority of allocations will address the large sites benchmark. It is important that housing is delivered where allocated; in line with the strategic policy, proposed developments which result in the reduction of land supply which could reasonably be expected to be suitable for conventional housing (such as an allocated site) will be refused.

3.24 Almost two thirds of Islington’s housing target is derived from small sites of less than 0.25 hectares. The Local Plan supports delivery of housing on small sites, which is a continuation of broad support for such development evident in previous years. This support is not carte blanche; small site housing delivery must address relevant policy requirements set out elsewhere in the Local Plan.

3.25 Progress toward meeting the borough’s housing target will be set out in the housing trajectory. An up-to-date housing trajectory will be published at least annually.

3.26 Proposals of any size which include housing should optimise housing delivery. The overarching Local Plan objectives should be the starting point for developing all proposals involving the development of housing, to ensure that new housing provision contributes to the fundamental aims of the Local Plan. In addition, any proposals involving the development of housing must optimise the amount of housing delivered, having regard to the following issues:

- The potential level of housing for which there is a defined need, particularly social rented housing and other types of genuinely affordable housing.
- The contribution that a particular site makes toward meeting housing targets.
- The impact on existing or planned infrastructure resulting from new occupants.
- The effect that a given level of housing delivery would have on other policies of the Local Plan, in particular mixed-use proposals involving housing where housing

<sup>2</sup> For purposes of the SHLAA and the derivation of a housing target, a small site is a site with an area of less than 0.25 hectares; and a large site is a site with an area of 0.25 hectares or greater. The London Plan policy H2 defines a small site as a development which provides between one and 25 homes.

may constrain the amount of business floorspace that could come forward to meet other development needs such as affordable workspace.

- 3.27 The loss of conventional housing will directly affect the ability of the council to meet housing targets. Existing housing should be retained, except where housing will be re-provided on the site with at least equivalent floorspace and where no more than one unit is lost (net), although any cumulative impact of small net losses from other similar proposals across the borough may be taken into account, which may mean that the net loss of single units is unacceptable on specific proposals. For the purposes of this policy, the conversion of more than two dwellings into a single dwelling is considered to be material for the purpose of section 55(1) of the Town and Country Planning Act 1990 (as amended), and would require planning permission.
- 3.28 Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing, with priority given to social rented housing as the replacement tenure, i.e. redevelopment of social rented housing should provide at least an equivalent amount of new, better quality social rented housing.
- 3.29 All development proposals for conventional residential dwellings (including conversions and extensions) must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in table 3.2, as follows:

**Table 3.2: Housing size mix priorities for each housing tenure**

Tenure	Studio/bedsit	1-bed	2-bed	3-bed	4-bed
Social rented	None	Low/Medium	High	Medium	Low
Intermediate rent – at London Living Rent levels (or rents akin to social rent)	None	Medium	High	Medium	Low
Intermediate rent – other Discounted Market Rent products	None	High	Medium	None	None
Intermediate – shared ownership	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

- 3.30 The housing size mix priorities have been derived from local evidence and engagement with the council’s housing team. The priorities reflect a snapshot in time, and are sensitive to issues outside the council’s control, including changes to the benefits regime. Affordable housing in particular may require a different mix to address short term changes in need/demand as a result of specific interventions (for example, efforts to reduce under-occupation).
- 3.31 The housing size mix of the wheelchair accessible units built to M4(3) ‘Wheelchair user dwellings’ standard may be informed by data supplied by the councils housing

allocations team. Further council evidence/research on affordable housing size mix that suggests different priorities may be a relevant to justify deviation from the proposed housing size mix on a case-by-case basis.

- 3.32 Units of two-bedrooms or more are considered to be family homes for the purposes of policy H2. One-bedroom units should not be the predominant sized unit across a development proposal overall, or as part of the individual market and affordable proportions of a scheme; however, within certain intermediate tenures where they are a high priority housing size mix as set out in Table 3.2, one-bedroom units may be the predominant unit size (provided they are not the predominant size mix for affordable housing overall, factoring in social rented provision).
- 3.33 Studio and bedsit units are not a priority housing size mix across any affordable or market tenures, and will not be permitted unless specific exceptional circumstances are demonstrated, including demonstrating that studio/bedsit units form a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable element. This is considered to be no more than 5% of units, as a percentage of units overall and as a percentage of each of the affordable and market elements of a proposal. Applicants will also need to provide evidence clearly showing why higher priority housing sizes cannot be accommodated.
- 3.34 Meeting Islington's housing need is challenging given the context of the borough and the competing development needs that need to be planned for. Where housing is provided, it is of paramount importance that the housing is occupied and contributes toward meeting housing need. To ensure that units are occupied, all new housing developments which propose 20 units or more will be required to enter into a planning obligation which requires the owners of individual dwellings within the development to use and occupy the individual dwellings as a dwelling house (i.e. personal occupation) or to ensure such use and occupation (i.e. through private rental). Further guidance is provided in the Prevented Wasted Housing Supply SPD.
- 3.35 Policy H2 covers Use Class C3 and C4 housing only. Relevant policies covering other types of residential accommodation are provided elsewhere in the Local Plan.

### **Policy H3: Genuinely affordable housing**

- A. A minimum of 50% of total net additional conventional housing built in the borough over the plan period must be genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and will not be counted towards the level of affordable housing provision on individual schemes.
- B. All sites (except for those which are currently or have been in full or partial public sector ownership) which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more must:
- (i) provide at least 45% on-site affordable housing (by net additional unit) without public subsidy; and

- (ii) exhaust all potential options for maximising the delivery of on-site affordable housing to reach and exceed the strategic 50% target, particularly through securing public subsidy.
- C. Where a site triggers Part B, and proposes a level of on-site affordable housing less than 50% (regardless of whether public subsidy is provided or not), the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism. Any sites which trigger Part B and provide at least 50% on-site affordable housing (by net additional unit) will not be subject to an advanced stage review mechanism but will be subject to review mechanism which will be triggered if an agreed level of progress on implementation is not made within a certain period following grant of planning permission; and, in the case of large phased schemes, triggered prior to the implementation of later phases of the development.
- D. All sites which are capable of delivering 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more, and which are currently or have been in public sector ownership (either part or full public ownership) must:
- (i) provide at least 50% on-site affordable housing (by net additional unit) without public subsidy; and
  - (ii) exhaust all potential options for maximising the delivery of on-site affordable housing in excess of 50%, particularly through securing relevant public subsidy.
- E. Where a site triggers Part D, and additional on-site affordable housing does not demonstrate 'additionality' to the council's satisfaction, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.
- F. Any proposal which does not provide the minimum required level of affordable housing set out in Part B or D will be refused.
- G. Site-specific viability information will only be accepted in exceptional cases, determined by the council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence consistent with the Development Viability SPD. Such proposals will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.
- H. Where affordable housing is provided on-site, the council will require an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should be London Living Rent, and regard will be had to the priorities set out in the council's Housing Strategy and other agreed evidence of housing need.
- I. Sites delivering fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace are required to provide a financial contribution to fund the development of affordable housing off-site. The level of contribution required will be £50,000 per net additional unit, except for the area south of Pentonville Road/City Road where the contribution required will be £60,000 per net additional unit.

- J. For proposals which trigger affordable housing requirements in Islington (either on-site or through financial contributions), application of the Vacant Building Credit will not be appropriate. Where an applicant provides exceptional reasons why the Vacant Building Credit should be applied on a particular development, they must meet all of the following criteria:
- (i) It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment at any point over the medium to long-term;
  - (ii) All buildings within the site boundary must be vacant at the time the application is submitted;
  - (iii) There are no extant or recently expired permissions on the site, for any proposed use class.
  - (iv) The proposal does not involve the loss of any capacity to meet other development needs from a site allocated for non-housing development; and
  - (v) The building has not been made vacant for the sole purpose of redevelopment, evidenced by provision of marketing and vacancy evidence for a continuous period of five years (up to the point of submission of an application). Such evidence must meet the marketing and vacancy requirements set out in Appendix 1.

- 3.36 The majority of housing need in Islington is for affordable housing, particularly social rented accommodation. Local evidence suggests social rented accommodation is the only tenure which is genuinely affordable to those individuals and families in housing need. Islington aspire to fully meeting this need, with a particular aim of delivering as many genuinely affordable homes as possible from private sites and from the council's own sites. Local Plan viability testing shows that 45% of affordable housing can be provided on a site-by-site basis, from development value alone, without constraining the viability of schemes. Indeed, in many cases, 50% affordable housing is viable without public subsidy.
- 3.37 In light of this, the Local Plan has a minimum strategic target for 50% of all housing delivered over the plan period to be affordable. Given that sites of less than 10 units and/or 1,000sqm are not required to deliver on-site affordable housing, this necessitates a strong requirement for affordable housing from schemes above this threshold to achieve 50% affordable housing. In addition, to balance out non-delivery from small sites, very high levels of affordable housing are expected to be delivered through the council's own housing schemes and those brought forward by Registered Providers. By implementing this package of measures, the council considers that 50% affordable housing, delivered across the plan period, is a deliverable and achievable objective.
- 3.38 Proposals for 10 or more conventional units (gross) and/or which propose 1,000sqm (GIA) residential floorspace or more must provide at least 45% affordable housing on-site, without public subsidy (such as grant funding). For such proposals, the council will not accept affordable housing provided off-site or financial contributions in lieu, as this would waste an opportunity for physical affordable housing to be delivered and/or would not contribute to the aim of achieving mixed and balanced communities. As stated above, in many cases 50% affordable housing is viable without public subsidy. Therefore, the council's policy is designed to incentivise developers to achieve 50% of affordable housing provision on all sites.

- 3.39 Sites which are currently or have been in public ownership must provide at least 50% affordable housing on-site, without public subsidy (such as grant funding); this applies to sites owned or in use by a public sector organisation, or company or organisation in public ownership; or land that has been released from public ownership, having previously been owned or in use (at any point in the past) by a public sector organisation, or company or organisation in public ownership. Public sector sites are public assets and therefore there is a reasonable expectation that such sites should prioritise affordable housing which helps address housing needs.
- 3.40 The Holloway Prison site is the largest potential development site in Islington. Viability testing has demonstrated that this public sector site can deliver at least 50% genuinely affordable housing, including the entire Intermediate component as London Living Rent. The council considers this site to be the benchmark for all public sector sites in the borough. Further information on the site is provided in the Site Allocations document and the Holloway Prison SPD.
- 3.41 The London Plan advocates a 'portfolio approach' to delivering affordable housing, whereby public sector landowners must deliver 50% affordable housing in total across a number of sites (which can be in multiple boroughs); individual sites within the portfolio can deliver less than 50% so long as the overall amount is at least 50%. The portfolio approach is not considered acceptable for any schemes in Islington. Each site must deliver affordable housing in line with the relevant part of policy H3. The council will not accept lesser delivery to compensate for other sites, either elsewhere in the borough or outside the borough. Such an approach is detrimental to the achievement of mixed and balanced communities.
- 3.42 On all sites (both public sector and non-public sector), in addition to the respective minimum affordable housing requirements to be funded from development value alone, all potential options to provide further affordable units (i.e. additionality) must be fully investigated, including seeking public subsidy. This should include proactive engagement with Registered Providers at the earliest possible opportunity, ideally at pre-application stage. Proposals should make clear the level of affordable housing provision with and without subsidy as part of the application process. On non-public sector sites which are required to provide a minimum of 45% affordable housing from development value alone, where the level of affordable housing does not meet at least 50% following any investigation of potential further options, the proposal will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.
- 3.43 National planning guidance<sup>3</sup> states that review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project. Advanced stage review mechanisms are an important tool to bolster affordable housing provision on each and every housing scheme, and thereby assist in meeting the council's key priority of delivering genuinely affordable housing.
- 3.44 For avoidance of doubt, any site which is not in public sector ownership which achieves at least 50% affordable housing on-site, without public subsidy, will not be subject to an advanced stage review mechanism; however, such sites should still exhaust all potential options for maximising the delivery of genuinely affordable housing in excess of 50%.

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<sup>3</sup> National Planning Practice Guidance - Viability, paragraph 009, reference ID: 10-009-20180724, available here: <https://www.gov.uk/guidance/viability>

- 3.45 Any proposal which does not provide the minimum required amount of affordable housing – in line with relevant policy requirements - will be refused. These levels of affordable housing have been informed by detailed viability evidence which demonstrates that these levels are viable and will not preclude development from coming forward. On a limited number of sites, there may be genuine exceptional circumstances which necessitate provision of site-specific viability information; the council will consider this on a case-by-case basis but the expectation is that such circumstances would relate to a significant shift in macro-economic conditions. Site-specific circumstances, including the amount paid for land, are not considered to be exceptional reasons to justify provision of site-specific viability, in line with Government guidance<sup>4</sup>. The council will not entertain a viability assessment if it is considered that there are no exceptional circumstances which justify doing so.
- 3.46 Generally, viability information should not normally be required at application stage in order to inform future review mechanisms, and therefore this will generally not be considered appropriate exceptional circumstances. Values and costs will be assessed in the future, at the point of the viability review, informed by the council's Development Viability SPD and, where relevant, the use of indices, to assess the change in values and build costs since permission was granted. However, there may be some cases – determined by the council - where limited site-specific viability information is necessary to enable future review mechanisms to operate effectively.
- 3.47 Where viability evidence is provided to justify the level of affordable housing, this should be in accordance with Islington's Development Viability SPD and relevant guidance published by the Mayor of London. This includes (but is not limited to) requirements for development proposals to:
- Provide relevant viability information at the earliest possible stage of the planning process, and clearly demonstrate that the requirement to provide the maximum level of affordable housing has been integrated in the scheme from the outset;
  - Ensure that all viability information is submitted at the validation stage of an application, and that revised information is provided as necessary to reflect changes to the scheme and/or wider market conditions;
  - Approach the assessment of viability in a transparent manner and make all documentation related to the viability assessment of a proposal publically available;
  - Ensure that the council's costs associated with assessing any viability assessment (including independent assessment as deemed necessary by the council), and any associated costs, are paid for in advance; and
  - Provide statutory declarations to verify the accuracy of any viability information submitted; to confirm that the company producing the viability assessment are not instructed on the basis of performance related pay or other incentives according to outcome of the viability process; and to confirm the deliverability of any scheme proposed;
- 3.48 A pre-implementation review mechanism will be applied to all proposals which include affordable housing; this will trigger if a permission has not been substantially implemented within 12 months of permission being granted (and may trigger in other circumstances including where development is substantially implemented then stalled). Mid-point review mechanisms will also be applied to large phased schemes.
- 3.49 Advanced stage review mechanism will be applied to schemes delivering less than 50% affordable housing, to ensure that viability is accurately assessed at the point at

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<sup>4</sup> Ibid

which actual values are realised. This ensures that the requirement to maximise affordable housing is built in to the development, even development that can initially – at the point of application through any accepted site-specific viability – demonstrate that a higher proportion of affordable housing is not viable.

- 3.50 Some specialist housing, including supported housing provided in line with policy H9, may in some circumstances contribute towards affordable housing requirements and can be discounted from the overall site-specific requirement.
- 3.51 The tenure of affordable housing must address the needs identified in local evidence, which suggests that the majority of Islington’s housing need is for rented accommodation at or below social rents. One of the key statistics from this local evidence is that almost half of Islington households cannot afford target rent<sup>5</sup>. A quarter of households can afford target rent based on this income/rent ratio, and only approximately a fifth of households can afford 80% of market rent or market rent. Therefore, maximising the delivery of social rented homes is the council’s absolute priority.
- 3.52 In addition to the extensive need for social rented housing, there is also need for intermediate housing which is genuinely affordable to those on low to moderate incomes, such as key workers in the borough. Shared ownership housing is, in the majority of circumstances, not affordable to these groups. Certain intermediate products, particularly London Living Rent<sup>6</sup>, may help address this element of housing need in the borough, albeit for a time-limited period rather than in perpetuity. Shared ownership may also be an acceptable intermediate tenure depending on the size of units and location within the borough, and where the total monthly costs including the rental element are demonstrably affordable. The rental element will be secured at an affordable level through legal agreement.
- 3.53 There are a number of other forms of affordable housing which will not be acceptable in Islington, as they would simply be unaffordable to those whose needs they are intended to meet:
- Discounted Market Sales (DMS) – DMS is an intermediate home ownership product that must be sold at a discount of at least 20% below local market value. DMS should be affordable to households which meet a specified household income cap<sup>7</sup>. DMS should remain available at a discount for future eligible households. Given the high average house prices in Islington and the required income multipliers that would be required even for an 80% mortgage, it is highly unlikely that DMS would meet defined housing needs in Islington. This would be the case even with substantially higher rates of discount, e.g. 50%+.
  - Starter Homes – Starter Homes are similar to DMS, although they have various statutory requirements attached, including an income cap (£90,000 in Greater London), price cap (£450,000 in Greater London, which includes the minimum 20% discount) and age restrictions (Starter Home can only be purchased by qualifying first time buyers aged between 23 and 40, although limited exceptions apply). Also,

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<sup>5</sup> Modelled on assumption that 30% of gross income of households in rented accommodation is spent on rent.

<sup>6</sup> This also applies to any replacement product which sets rents at a low proportion of the prevailing market rate, and which is therefore affordable for those on low to moderate incomes whose needs it is intended to meet.

<sup>7</sup> The current income cap for Intermediate Ownership is £90,000, as set out in the London Plan Annual Monitoring Report. Any updated income caps in future London Plan AMRs, or any initial income caps set at a local level, will be relevant for the purposes of assessing intermediate ownership proposals.



Starter Homes have a set discount period, during which the home needs to be sold at a set discount, although this discount is not recycled following the end of the discount period. Like DMS, Starter Homes are unlikely to meet defined housing needs in Islington.

- Affordable Private Rent (APR) – APR is intermediate rented housing provided within Purpose Built Private Rented Sector development – so-called ‘Build to Rent’ development. Policy H11 details Islington’s approach to ‘Build to Rent’ and includes, inter alia, a requirement to provide genuinely affordable housing, for example through the provision of London Living Rent units or provision of units with rents akin to social rent. APR at high percentages of market rent will not be acceptable as part of any ‘Build to Rent’ development, as they would not contribute toward meeting identified housing need and would validate the perception that ‘Build to Rent’ is a wasted opportunity for conventional housing which could provide more priority affordable tenures such as social rent.

- 3.54 Proposals involving fewer than 10 residential units (gross) and/or which propose less than 1,000sqm (GIA) residential floorspace. The level of contribution is set out in policy<sup>8</sup> and is determined by the number of net additional units provided and the location of a proposal. For avoidance of doubt the required contribution applies to new build units, conversions of existing buildings resulting in the creation of new units, and subdivision of existing residential properties resulting in net additional units. The contribution applies to residential units within the C3 and C4 Use Classes. Affordable housing requirements for non-C3/C4 housing are covered in policies H6 and H11.
- 3.55 In cases where an applicant is seeking to demonstrate - through a viability assessment - that a full contribution is unlikely to be viable, they will be required to provide this assessment when the planning application is submitted; the council will not accept viability assessments submitted during the application process. The council reserves the right to have any viability assessment independently assessed, the cost of which must be borne by the applicant.
- 3.56 Proposals which include on-site provision of social rented housing will not be required to make a financial contribution, unless the unit/s proposed on site are worth less than the full financial contribution that would be required for the scheme. In such cases, the council will require the difference in value to be provided as a top-up financial contribution.
- 3.57 Contributions for off-site affordable housing for small sites – whether for the full amount or a lesser amount in line with the findings of agreed viability evidence – and the trigger point for payment of the contribution will be secured through a unilateral undertaking (Section 106, Town and Country Planning Act, 1990) which site owners, including mortgagees, will be required to enter into before the planning permission is issued. The contribution will be payable on commencement of the development, although in exceptional cases the council may accept alternative payment triggers, such as:
- Payment on practical completion for very small developments (i.e. subdivision of an existing home to create one additional unit).

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<sup>8</sup> The standard level of contribution may be updated via a Supplementary Planning Document in future, where updated evidence suggests a different standard amount is viable.

- Payment on future sale where an additional self-contained unit is being created for a family member (or in similar circumstances) and there will be no immediate sale of the unit.

3.58 The Vacant Building Credit (VBC) is a material consideration in relevant planning determinations but in Islington, it is likely that the acute need for affordable housing will outweigh application of the VBC in all cases. The aim of the VBC is to incentivise development on brownfield sites, but this is an unnecessary incentive in Islington given that all development sites are brownfield, and the rate of recent and projected housing delivery is strong. Applicants looking to justify application of the VBC will need to demonstrate exceptional circumstances and ensure that they meet all the following criteria:

- Provision of evidence that clearly demonstrates that the site would not come forward for redevelopment without use of the VBC. This should include, but is not limited to, viability evidence.
- Marketing and vacancy evidence to a standard set out in Appendix 1. This should be for a continuous period of at least five years up to the point of submission of an application. Any gaps in marketing or periods of time where marketing activity was less active will not be considered part of a continuous period.
- The proposed site is not allocated for non-housing development, either fully or in part. VBC may exacerbate loss of such sites which will detrimentally affect the ability to meet other development needs. For the purposes of the policy, non-housing development includes mixed-use allocations for housing alongside other uses and is not limited to sites allocated for 100% non-housing uses.
- There should be no extant or recently expired (i.e. expired permissions with lapse date within three years prior to the point of submission of an application). Evidence of extant and/or recently expired permissions demonstrate that development is likely to come forward without additional incentive.

3.59 Where an applicant meets the criteria and VBC is applied, VBC should be applied to the strategic policy of 50% affordable housing.

3.60 It should be noted that if a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy relief through the vacancy test.

#### **Policy H4: Delivering high quality housing**

- A. All new C3 and C4 housing developments (including conversions and changes of use) and specialist housing identified in policies H6 to H11 should be designed and built to a high quality for the duration of its lifetime. A high quality dwelling is one which meets the criteria set out in this policy and accords with the Local Plan objectives and other relevant Local Plan policies. Sufficient information, such as detailed dwelling plans showing internal layout, must be provided at the earliest possible stage of an application, to allow for proper assessment of proposals.
- B. Residential development should be functional useable and comfortable space that has good amenity for occupiers of all ages. Regard must be had to the surrounding local context as part of the holistic consideration of inclusive design. Housing should be built to be accessible and adaptable to meet changing occupier circumstances

over the lifetime of the development, and must provide 90% of dwellings to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to Category M4(3) 'Wheelchair user dwellings' standard, as set out in the Approved Document M of the Building Regulations. M4(3) standard dwellings should:

- (i) be provided across all tenures and unit sizes, and integrated within the development;
  - (ii) be fitted out appropriately to enable occupation by a range of occupiers with diverse and changing needs; and
  - (iii) be single-storey, preferably on the ground floor. Where provided above or below entrance level there must be at least two suitable lifts available for use by each unit within a convenient distance from the front door of the units.
- C. Residential development must meet or exceed the minimum space standards, and address other requirements for private internal space, as set out in the London Plan and relevant Supplementary Planning Guidance. Appropriate consideration should also be given to:
- (i) Providing sufficient space for the general and specific storage needs of residents (including those with disabilities) living within dense urban development, where options for storing possessions are often very limited;
  - (ii) how recycling and waste arising from the occupation of the development will be stored, collected and managed, particularly for flatted residential development; and
  - (iii) provision of rooms which are designed to function comfortably and efficiently for their intended purpose.
- D. Good circulation space should be provided within each residential unit. Multi-storey dwellings should provide space for provision of a stair lift, and a suitably identified space for a through-the-floor lift from the entrance level.
- E. In new housing development, all habitable rooms, kitchens and bathrooms are required to have a minimum floor to ceiling height of 2.6 metres (between finished floor level and finished ceiling level). In residential conversions, including extensions, where the original ceiling height is maintained, a lower ceiling height may be acceptable where it can be demonstrated that overall a good standard of daylight, natural ventilation and useable floor space can be provided.
- F. Layout and design should accord strictly with tenure blind principles to maximise opportunities for social interaction. Affordable units should be 'pepper-potted' alongside market units within housing developments, rather than being separated within buildings; affordable provision in fully separate buildings will be resisted. Development should be designed from the outset to ensure shared building access for both market and affordable units. Where applicants have demonstrated that this is not possible and/or where shared building access would demonstrably impact the level of affordable housing on site, building access for affordable units must:
- (i) be accessible and located on main frontages or as close as possible to main frontages;

- (ii) ensure that the location of building access will not affect safety and security of residents or lead to negative perceptions of safety and security; and
  - (iii) maintain the dignity of residents of affordable units and avoid locating building access for these units adjacent to waste/refuse areas and/or other building services.
- G. Residential development, particularly flatted development and proposals involving the conversion of residential unit(s) into a larger number of units must consider the effect on the amenity of adjacent properties, and put in place measures to address any adverse effects raised. This consideration should include (but is not limited to):
- (i) Internal layout, including the relationship of rooms on different floors within the scheme, and the position of entrances, extensions and fire escapes;
  - (ii) Consideration of any overlooking or overshadowing impacts;
  - (iii) Noise and vibration impacts (see also Part J of this policy); and
  - (iv) Visual intrusion, both internal and external to a specific scheme.
- H. All new residential units should be dual aspect, unless provision of dual aspect is demonstrated to be impossible or unfavourable. Where such circumstances are demonstrated, all single aspect units must:
- (i) Provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight;
  - (ii) Ensure that the aspect is not predominantly north-facing and does not face onto main roads or other significant sources of air pollution and/or noise and vibration, which would preclude opening windows;
  - (iii) Provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and
  - (iv) Ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.
- I. The design of all residential development is required to maximise natural light into the room (subject to passive heating and cooling considerations). The glazing to all habitable rooms should be generous and aim to be not less than 20% of the internal floor area of the room. All dwellings should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day. Living areas, kitchen and dining spaces should preferably receive direct sunlight.
- J. All development proposals which include residential units must fully assess noise and vibration impacts on and between dwellings, in line with policy DH5. Proposals should:
- (i) ensure residential units are sited away from sources of noise and vibration, to prevent impacts occurring; or
  - (ii) Where this is not possible, provide a detailed assessment of noise and vibration impacts. Where noise and/or vibration effects are identified suitable mitigation measures must be put in place to reduce these effects, through the proposed

layout (including the interaction of non-residential and residential uses in mixed use developments), design and materials. If effects cannot be mitigated, planning permission will not be granted.

- K. All development proposals which include residential units should ensure that the overall approach to all entrances is logical, legible and level or gently sloping. The distance from parking spaces/drop-off points to the main entrance to the residential building should be no more than 50m. The total distance between parking bay or drop-off point and an individual dwelling entrance should be no more than 75m.
- L. In all new residential development, the number of dwellings accessed from a single core must not be more than eight on each floor, although a smaller number is preferable. The following criteria must be addressed in relation to shared circulation space:
  - (i) Common/shared entrances should lead to a hall large enough for people to manoeuvre with shopping and/or baby buggies, and in wheelchairs, with ease.
  - (ii) All dwellings should be provided with step-free or lift access.
  - (iii) Communal circulation corridors should ideally be 1,500mm wide, but no less than 1,200mm wide. Where they have an unobstructed width of less than 1,500mm, communal corridors should have wheelchair turning spaces at reasonable intervals.
  - (iv) Access cores must provide an access control system, with entry phones in all dwellings linked to a main front door with remote electronic lock release.

- 3.61 High quality housing is housing which accords with the Local Plan objectives, and which meets the full breadth of design requirements set out in policy H4, as well as other Development Plan policies including those focused on sustainability and amenity. A home should be a place of retreat, where people can feel comfortable and safe. Collectively, the design of new homes can provide the foundation for mixed and balanced communities to develop and thrive. The Local Plan objectives are the starting point for the design of new homes.
- 3.62 Design policy therefore must be people-focused to ensure that the needs of individuals and families are the heart of housing that is developed in Islington. Collectively, this focus on high quality housing will contribute to the development of mixed and balanced communities. Ensuring that affordable housing is integrated within development is one specific way that such communities can develop. In order to facilitate this, all development must adhere to tenure-blind principles to ensure that the affordable and private housing elements are indistinguishable from one another, which assists with limiting the stigma often attached to affordable housing development.
- 3.63 Affordable housing should be pepper-potted (i.e. mixed within the same building) alongside market housing; provision of affordable housing in separate buildings will be resisted. Where affordable housing is provided in the same building as market housing, but is not pepper-potted, the proposal must adhere to tenure blind principles to ensure that there is no obvious distinction between private and affordable units. Access to the building should be shared, unless this is demonstrably not possible and/or where shared building access would demonstrably impact the level of affordable housing on site. In these circumstances, separate entrances must be

accessible, safe, secure and not sited adjacent to waste/refuse areas and/or other building services.

- 3.64 All applications involving new housing should be accompanied by sufficient information to allow for full assessment against policy H4 criteria. Information should be provided as early as possible in the planning application process, ideally at pre-application stage where relevant. Applicants are required to provide details of proposed overall floor space and a breakdown of dwelling and room sizes, including occupancy. Dwelling plans are required to demonstrate how dwellings will accommodate standard-sized furniture, access and activity space needs related to the declared level of occupancy, including internal space where children can play; and standards for adaptable and/or wheelchair accessible homes. Plans should also show how separate storage (within suitable containers) of food waste, mixed dry recycling and any non-recyclable waste can be accommodated within the home. Those details not evident on the dwelling plan are required to be detailed in the Design and Access Statement and relevant schedule of accommodation (for example, details such as level entry showers and the route for ceiling mounted hoists).
- 3.65 Larger units of 3 bedrooms or more should normally provide a separate living room and kitchen/dining rooms. Where separation is not possible, a demountable partition should be provided (or provision made for its installation) between kitchen/dining rooms and living rooms, ensuring adequate circulation and activity space within each discreet area.
- 3.66 Homes that are built to be adaptable to changing needs have the potential to enable individuals to stay put longer, which contributes towards meeting various policy objectives, including the creation of mixed and balanced communities and the move towards a circular economy (by reducing the need for significant and costly retrofitting and/or redevelopment in the future). Importantly, it reduces the need for certain types of specialist housing, particularly older persons housing, by allowing people to maintain independence and minimising unwanted moves to residential care.
- 3.67 Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion and/or change of use. Housing delivery through conversion and/or change of use could be significant over the plan period, given the densely developed characteristics of the borough, therefore it is vital that all new dwellings created embed the principles of inclusive design, having regard to the overarching objectives of the Local Plan. Islington will seek to secure the greatest degree of 'visitability' and adaptability that is reasonably achievable within an existing structure.
- 3.68 Approved Document M of the Building Regulations sets out standards for 'Accessible and Adaptable' - Category M4(2) – and 'Wheelchair user dwellings' – Category M4(3). Policy H4 requires 90% of dwellings to be built to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to be built to Category M4(3) 'Wheelchair user dwellings' standard.
- 3.69 Category M4(2) dwellings are considered suitable for older people, some disabled people including some wheelchair users, and also for non-disabled people, including families with children. Building to this standard will ensure that London's housing stock becomes progressively more capable of responding to the needs of a range of households as they live independently for longer and their circumstances and levels of mobility change over time. It ensures that households who need to accommodate a disabled family member from birth, or through accident, injury or illness or old age are able to make feasible and effective adaptations to their homes, without or incurring substantial cost or needing to move property.

3.70 Category M4(2) and M4(3) dwellings must be fitted out appropriately to enable occupation by a range of occupiers with diverse and changing needs. This includes consideration of how occupiers use internal space. Further guidance is provided in the Inclusive Design SPD, but generally development should include:

- appropriate internal door opening weights (no more than 30N);
- a level entrance with threshold heights not exceeding 15mm;
- window controls that are reachable and usable by those with mobility impairments; and
- kitchens and bathrooms capable of being adapted easily – e.g. walls capable of taking grab rails, appropriate drainage to facilitate step free shower installation, kitchen tiling and plumbing which supports the operation of flexible height work surfaces and sink.

3.71 The council may, in limited circumstances, accept a S106 contribution in lieu of Category M4(3) units on site, where there is definitive local evidence of a supply/demand imbalance for wheelchair accessible units. This contribution will be used to finance the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. Any units where the council accepts a contribution in lieu must be designed to Category M4(2) standard, instead of M4(3). The process for securing this contribution, and the amount required, will be set out in a revised Inclusive Design SPD. Wheelchair parking allowances may need to be adjusted dependent on the proportion of wheelchair accessible units provided.

3.72 Where the accommodation is provided on two or more floors, an indicative position for a through the floor lift should be shown on plan and a soft spot constructed on site.

3.73 The provisions of Part M take no account of local context in terms of development type or density, travel and transport facilities, or the infrastructure (utilities and amenities) supporting new or converted residential development, which are important as part of holistic consideration of inclusive design. The following requirements will help ensure the delivery of inclusive environments, rather than just focusing on inclusive design within dwellings. Further information is also provided in the Inclusive Design SPD and the Streetbook SPD.

- Wheelchair housing units should be single-storey, as multi-storey wheelchair units have significantly increased energy usage due to the need to operate a through-the-floor lift, which also leads to increased energy costs for occupiers.
- Wheelchair housing units should be provided across all tenures and unit sizes, and integrated within the development, preferably on the ground floor. Where provided above ground floors they must be served by at least two suitable lifts, within the common parts, within a convenient distance.
- The overall travel distance between transport drop-off points (e.g. bus stops, car parking spaces, car club bays, loading bays), the main entrance of a development, and the entrance of each individual dwelling should be kept to a minimum and demonstrably within the reach of ambulant disabled people. There should be a maximum total distance of 75 metres from the drop-off point to the dwelling entrance.
- Gates should be avoided on all entrance routes to buildings. Common entrances should be designed in accordance with standards set out in Islington's Inclusive Design SPD. Revolving doors are not considered acceptable for any entrances; provision of pass doors adjacent to revolving doors will not make revolving doors acceptable, as they create a separation between entrances for different users, which is not consistent with Local Plan inclusive design objectives and policies.

- In all residential development, provision for the storage and charging of mobility scooters should be provided within communal parts, in close proximity to lifts, and no more than 20m from dwelling entrances. Entrances to mobility scooter stores must be step free. All doors must be lightweight yet secure, and sufficient turning space must be provided
  - Recycling and refuse stores, bins, post boxes and other communal facilities should be located conveniently within the development, to encourage uptake of recycling, and should be wheelchair accessible.
- 3.74 London Plan policy D4 sets out minimum internal space standards (in GIA) for new residential development, inclusive of space for storage, as well as other specifications for private internal space including bedroom sizes; these standards reflect the Nationally Described Space Standard. All new residential development in Islington, including conversions, changes of use and relevant specialist housing identified in policies H6 to H11, must meet these minimum space standards and specifications (except ceiling heights, which has a separate locally specific policy). The council will resist configurations which do not have identified minimum space standards and specifications, as these are not considered to be conducive to high quality design and would not provide a good standard of amenity.
- 3.75 Units which significantly exceed the minimum space standards will not be considered to be making optimal use of a site/land, and would therefore not be consistent with Local Plan policy H2. Provision of studies is also considered to be sub-optimal, and should not be used as a means to circumvent space standards by subsequently utilising as additional bedrooms.
- 3.76 Rooms within dwellings, particularly habitable rooms, should be designed to function comfortably and efficiently for their intended purpose, having regard to aspect, outlook, noise, ventilation, privacy and light. Regard should be had to the ability to adapt dwellings to meet changing needs and circumstances in the future, although accommodating flexibility does not outweigh the need to meet standards and design requirements.
- 3.77 Management of recycling and waste is an important strategic issue. Effective segregation of recyclable materials by residents and high recycling rates are dependent on the provision of convenient, well designed facilities both within the home and in common areas. In order to implement an effective system of waste management in Islington, it is essential that new development enables effective recycling and waste segregation and collection. All residential developments (particularly major developments) must provide appropriate information which clearly demonstrates how recycling and waste arising from the occupation of the development can be adequately segregated, stored, collected and managed, whilst ensuring that impacts on amenity are mitigated/prevented; this should include a specific Recycling and Waste Management Strategy where necessary. Applicants should have regard to council guidance on Recycling and Refuse Storage Requirements, which includes guidance on the level of information that should be provided as part of applications. Other relevant best practice guidance should be referred to where relevant.
- 3.78 Recycling and waste storage facilities should be integrated into new developments, both within the home and in communal locations that are accessible to all. Both in-home and communal storage should allow for separate storage of recyclable materials. On-site treatment of waste should be investigated for larger developments, including consideration of adequate contingency measures in case of any mechanical breakdowns.



- 3.79 With regard to ceiling heights, Islington require a minimum floor to ceiling height of at least 2.6 metres (between finished floor level and finished ceiling level), for at least 75% of the GIA of each dwelling. Providing appropriate ceiling heights is an integral part of achieving high quality housing, as it is one of the most tangible design elements that enables a home to become a comfortable place of retreat. Many modern homes in high density housing developments have relatively low ceiling heights of 2.3 metres to 2.4 metres to maximise the number of floors built at a given building height. The low level of public open space and the high-density of built form in Islington means that private outdoor space and internal space in the home are even more important to quality of life (including mental health) than in less densely populated areas. Higher ceiling heights provide a greater sense of space and help keep rooms cool in summer months. They can also improve the amount and quality of natural light and ventilation and may also allow for future adaptability to convert properties to adjust to occupants' changing needs over time, for instance through the installation of ceiling mounted hoists.
- 3.80 In residential conversions (including extensions), there may be some flexibility with the minimum ceiling heights requirement where the original ceiling height is being maintained. In such circumstances, applicants must still ensure that a good standard of daylight, natural ventilation and useable floor space can be provided, in line with other design requirements.
- 3.81 Amenity is an important consideration when determining the quality of housing. The design of housing is intrinsically linked to amenity; poor design often means a poor standard of amenity for future occupiers. Amenity can be affected by various factors, either individual factors or a combination of factors, including noise, levels of daylight and sunlight and the general level of comfort. The agent of change principle set out in policy DH5 enables full consideration of various potential impacts on amenity, where new development is proposed in close proximity to existing residential units.
- 3.82 Noise and vibration impacts can make dwellings uninhabitable. It is therefore vitally important that noise and vibration impacts are robustly assessed for all planning applications involving residential use, at the earliest possible stage of the development. Further information is provided in policy DH5.
- 3.83 In the first instance, proposals should be sited away from potential sources of noise and vibration, although given the boroughs densely developed nature, this may not always be possible. In such cases, noise and vibration impacts should be assessed in line with policy DH5. Good acoustic design in and around new residential development should be a key consideration from the earliest possible stage of development proposals.
- 3.84 Where impacts are identified, they should be mitigated through proposed layout and design of a scheme, and through use of appropriate and effective materials (for example, in walls and floors) which dampen noise and vibration between and within dwellings, and between dwellings and public and/or communal areas. Layout in particular can be effective in mitigating impacts arising from mixed-use developments. The layout of adjacent dwellings and the location of lifts and circulation spaces is required to limit the transmission of sound to noise sensitive rooms within dwellings. Applications which cannot demonstrate effective mitigation for all proposed residential units will be refused. Residential conversions in particular can commonly lead to adverse amenity impacts including from noise and vibration; proactive consideration of layouts and other issues can help mitigate or prevent these impacts.

- 3.85 Applications which cannot demonstrate effective mitigation of noise and vibration for all proposed residential units will be refused.
- 3.86 Dual aspect dwellings have multiple 'comfort' benefits, particularly by maximising levels of natural light and enabling cross ventilation (and therefore reducing necessity for mechanical ventilation). All residential dwellings should be dual aspect. There may be legitimate circumstances where dual aspect is impossible or unfavourable, but this should be clearly demonstrated in line with the policy requirements. Provision of a greater quantum of residential units is not considered adequate justification for provision of single aspect units.
- 3.87 Levels of daylight and sunlight within new residential development, particularly within habitable rooms, can be integral to the enjoyment and comfort of a home, and are therefore a key factor in what constitutes a high quality home.

### **Policy H5: Private outdoor space**

- A. All new residential development and conversions will be required to provide private outdoor space, in the form of gardens (for houses and ground floor maisonettes) or balconies (for upper floor dwellings). Any provision must be of a good quality which is designed - in terms of its shape, position and location within development proposals - to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
- B. Glazed ventilated winter gardens may be considered an acceptable form of private outdoor open space where:
- (i) Gardens or balconies would lead to issues of overlooking, either for future occupiers of the proposed residential unit or for existing adjacent residential units; or
  - (ii) Gardens or balconies would be likely to experience noise in excess of relevant standard set out in Appendix 2; or
  - (iii) Gardens or balconies could lead to adverse noise impacts, with regard to noise generated by future occupiers using the outdoor space and the impact this may have on adjacent dwellings.
- C. Where winter gardens are acceptable in line with Part B, they must have a drained floor and be thermally separated from the interior; and must be of a good quality in line with considerations set out in Part A.
- D. The minimum requirement for private outdoor space is 5sqm on upper floors and 15sqm on ground floors for 1-2 person dwellings. For each additional occupant, an extra 1sqm is required on upper floors and an extra 5sqm on ground floors.
- E. Balconies and other private external spaces should have a depth and width of not less than 1.5 metres.

- F. Communal provision of private outdoor space, in lieu of private outdoor space for each individual residential unit, will only be acceptable for non-family units, where:
  - (i) Provision of individual private outdoor space is considered likely to cause adverse impacts related to overlooking and noise, both within and external to the development;
  - (ii) The provision of communal outdoor space would lead to a higher quality scheme overall;
  - (iii) The level of communal space provided is commensurate with the type and size of the accommodation and the households it is intended to serve; and
  - (iv) Access to communal space is not restricted, particularly on basis of the tenure of residential units.
- G. Where roofs are utilised to provide private and/or communal outdoor space, proposals must demonstrate that:
  - (i) There are no adverse impacts relating to noise, overlooking and privacy of future residential occupiers as well as existing residents adjacent to the site;
  - (ii) The space is designed to prevent crime and to ensure that security of residents is not compromised; and
  - (iii) Use of roofs for amenity purposes is balanced with the use for green roofs and renewable energy equipment in line with relevant Local Plan policies, through careful design which integrates the benefits for biodiversity, carbon reduction and amenity.
- H. All new build residential developments and, where practicable, residential conversions should provide step-free access and a level threshold from homes to private outdoor space.
- I. Any basement and/or ground floor unit should have a defensible space not less than 1.5 metres in depth in front of any window to a bedroom or habitable room.

3.88 Given the high density built form and low level of open space in Islington, private outdoor space is an important factor in providing good quality housing within the borough. Islington has shortfalls in the provision of public open space to the extent that it has one of the lowest amounts of open space of any Local Authority in the country. Many recent new buildings and converted houses do not have access to a garden or any other private outdoor space such as a balcony or terrace. This is not satisfactory as it does not provide space for future occupants to be outdoors in a private setting.

3.89 Policy H5 requires provision of private outdoor space proportionate to the level of occupation of proposed dwellings. In a densely built up borough such as Islington, ground floors offer the greatest scope to increase provision and ensure that family accommodation benefits from a good level of amenity which enables secure and safe play by children; therefore, the council considers that higher standards should be required for ground floor dwellings, which, for avoidance of doubt, includes units fully or partly within basements.

- 3.90 Houses and ground floor flats maisonettes should have private gardens. Dwellings on upper floors should all have access to a private balcony, terrace, or (where considered acceptable) glazed ventilated winter garden. The standards for upper floor dwellings provide sufficient space for either a meal around a small table, clothes drying, or for a family to sit outside with visitors.
- 3.91 It is acknowledged that the provision of individual private outdoor space can be challenging on some sites and that accessible, well maintained and managed communal provision can provide a workable solution where it would not be practical to provide individual areas for each unit of accommodation. However, even the best designed communal spaces do not provide residents with their own private outdoor space accessible directly from their home. Communal spaces in lieu of private outdoor space will only be considered acceptable for non-family units, in line with policy H2 (i.e. one-bed units), and where other policy criteria is addressed, including addressing any issues regarding overlooking and noise. Where it is acceptable to provide outdoor space communally, the total space requirement should provide a level of communal outdoor space commensurate with the type and size of the accommodation and the households it is intended to serve.
- 3.92 Access to communal space in mixed tenure blocks (e.g. featuring market and affordable housing) should be not be restricted on the basis of tenure, unless there are demonstrable issues regarding maintenance of communal space which could affect the overall provision of affordable housing on a scheme.
- 3.93 Roof terraces/gardens can provide outdoor space (either private space, or communal where acceptable) where balconies are not achievable. Larger buildings can have the ability to provide both private balconies and communal roof terraces. Using roofs for amenity space can reduce runoff of rainwater by using plants and soft landscaping to capture and store water but there can be a potential conflict in the use of roofs between the need for amenity space and the need to create biodiversity-rich green roofs and provide space for renewable energy generation. High quality design should aim to resolve any potential conflicts between creating green roofs, providing renewable energy and supplying amenity space on roofs for residents.
- 3.94 In assessing the quality of private outdoor space provision in development proposals, whether individual or communal areas, the shape and position and how they have regard to such matters as daylight and sunlight, noise, enclosure and privacy will be considered.
- 3.95 Issues of overlooking and noise can be a significant concern with roof terraces and balconies, which can also detract from the character of surroundings; careful design can reduce this impact. Concerns regarding noise should also be considered in the context of the noise generated by residents using their gardens, and how that impacts on dwellings above them. Impact of noise from external noise sources on the quality of private outdoor space will also be a consideration; further detail is set out in Appendix 2.

## Policy H6: Purpose-built Student Accommodation

- A. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will only be permitted on:
- (i) sites allocated for purpose-built student accommodation; or
  - (ii) sites with existing purpose-built existing student accommodation, subject to consistency with other Local Plan policies and additional impacts of development being acceptable.
- B. All proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation must ensure a high standard of amenity for future occupiers of the development and residents in the surrounding area and must meet all the following criteria:
- (i) Provide high quality accommodation in line with policy H4, including the provision of good-sized rooms and communal space in line with relevant space standards; designing general needs units to be 'visitable' and shared facilities accessible; and ensuring a high level of amenity (including limiting noise impacts and providing good levels of daylight and sunlight, and natural ventilation).
  - (ii) Ensure that 10% of bedspaces are wheelchair accessible and a wheelchair accessible WC is provided on every floor. Where wheelchair accessible rooms are located above entrance level, an evacuation lift must be provided in addition to any requirement for a fire-fighting lift;
  - (iii) provide an ongoing financial contribution (as long as the site is in use as student accommodation) towards the provision of student bursaries for students leaving council care and/or other Islington students facing hardship who are attending a higher or further education establishment;
  - (iv) ensure that the development is subject to an appropriate site management and maintenance plan;
  - (v) ensure that student accommodation is occupied only by students (and where necessary, members of a specified higher educational institution). Use as general visitor accommodation - either short-term or long-term - will be refused due to the individual and cumulative impact on housing supply; and
  - (vi) provide at least 35% affordable student accommodation, unless this level of provision would affect other requirements in policy H6, particularly student bursaries. In such cases, the level of affordable student accommodation should be the maximum viable.

3.96 Due to the substantial amount of purpose-built student accommodation delivered in Islington over the past 10-15 years, the remaining purpose-built student accommodation supply in the pipeline and the need to prioritise conventional housing and employment growth, the development of purpose-built student accommodation is limited to specific locations, either allocated sites, or, in certain circumstances, intensification of existing student accommodation. This is in line with the London Plan's dispersal policy, which supports Inner London boroughs limiting the quantum of additional student development to ensure delivery of conventional housing, due to the

significant recent delivery rates of student accommodation. Islington has consistently had the highest rates of student housing delivery in London in recent years.

- 3.97 The delivery of student accommodation contributes to overall housing delivery based on the amount of general housing that is (theoretically) freed up from students residing in other forms of accommodation. Previously permitted student accommodation was counted towards the housing target on a 1:1 basis, meaning that one bedspace counted as one housing unit for monitoring purposes. Any student accommodation permitted following the adoption of the Local Plan should be monitored on a 3:1 basis (in line with the London Plan), meaning every three bedspaces will equate to one unit of housing. This makes student accommodation a less optimal use of land than conventional housing, which can manage the same, if not greater delivery levels but with the benefit of meeting a broad range of needs.
- 3.98 It is important that student accommodation is high quality, in line with Local Plan policies which look to secure high quality housing, particularly policy H4; this includes requirements relating to daylight and sunlight and noise. Bedrooms and separate communal/amenity areas should reflect relevant space standards. Kitchen, washing and utility facilities should meet environmental health requirements.
- 3.99 To ensure purpose-built student accommodation follows inclusive design principles, general needs bedrooms should be 'visitable' while shared facilities should be accessible. A wheelchair accessible toilet should be provided on every floor. Buildings should also be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. Further guidance is provided in the Inclusive Design SPD.
- 3.100 Site management and maintenance is considered key to successful student accommodation and will be secured by legal agreement. This must cover matters such as provision of on-site wardens, use of communal facilities, elimination of potential noise nuisance, recycling facilities, the approach to security and safety for students and the management of anti-social behaviour. To better inform determination of proposals for purpose-built student accommodation, a site management and maintenance plan should be submitted at the earliest possible stage, ideally at pre-application stage. A condition will be imposed on all student accommodation permissions requiring adherence to the management plan.
- 3.101 Restrictions will be imposed to ensure that student accommodation is only occupied by students (including, where necessary, members of specific educational institutions) and the whole scheme is retained as an individual unit of student accommodation. The use of student accommodation or any part of a scheme as general visitor accommodation at any time (including temporary use outside term time) is considered unsuitable. This could have a significant impact on local housing supply by removing units from the housing market for certain periods. There are also potential amenity issues for longer-term student occupants, particularly related to noise, safety and security issues.
- 3.102 All new student accommodation, including any extension/intensification to existing built or permitted schemes, is required to contribute funding for bursaries. The bursaries will help increase access to higher and further education and tackle worklessness by providing funding for bursaries for students leaving council care and other Islington students facing hardship who are attending a higher or further education establishment. The funding provided by the development will be an annual payment,

equivalent to 2.4%<sup>9</sup> of the total annual rental income from a development of student accommodation for thirty years or as long as the site is used for student accommodation, whichever is the shorter period of time.

- 3.103 The London Plan requires provision of 35% affordable student accommodation. Islington support this in principle, but the clear priority is for the provision of student bursaries. All new student accommodation, including any extension/intensification to existing built or permitted schemes, should provide both student bursaries and affordable student accommodation, but where evidence suggests that full delivery of both is not financially viable, the requirement for student bursaries will take precedence. Given the extreme inequality in Islington related to long term worklessness and other factors, bursaries are much more likely to have a meaningful positive impact by offering education opportunities to local young people.

### **Policy H7: Meeting the needs of vulnerable older people**

- A. The need for accommodation for older people will be met primarily through delivery of conventional residential accommodation designed to be adaptable to changing needs over time. Different levels of care may be delivered in conventional accommodation which means there is no need for certain specialist forms of older persons housing, in particular market extra care housing.
- B. There is some local need for affordable one and two-bed extra-care units. This specific type of specialist older persons accommodation may be acceptable on certain schemes, but only where the council's Adult Social Care team consider that the proposed accommodation would meet a defined need.
- C. Specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:
  - (i) There is an evidence of local unmet need for specialist older people accommodation;
  - (ii) Affordable housing is provided in line with policy H3;
  - (iii) It has adequately considered and addressed all design issues in Part D or Part E to ensure the accommodation is suitable for the intended occupiers and provides the necessary level of supervision, management and care/support;
  - (iv) It is easily accessible to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and
  - (v) It constitutes a suitable use for the site considering the surrounding neighbourhood, potential for development of other priority land uses and its contribution to mixed and balanced communities.

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<sup>9</sup> This amount may be updated through a Supplementary Planning Document, based on any updated evidence.

- D. Extra care proposals will be classed as a C3 use. Such proposals should demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- (i) Provision of self-contained units, or at least en-suite private rooms which meet or exceed minimum space standards, and address other requirements for private internal space;
  - (ii) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - (iii) Provision of appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use;
  - (iv) Appropriate wheelchair accessibility in line with policy H4;
  - (v) Provision of good quality guest and/or staff accommodation (where appropriate) in line with space standards, with sufficient storage space and facilities for visitors and staff;
  - (vi) Servicing access and a safe drop off point within 50m of the main entrance in line with H4; and
  - (vii) Provision of suitable charging points for mobility scooters – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings.
- E. Care homes should demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- (i) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - (ii) 100% of all habitable rooms are wheelchair accessible;
  - (iii) Provide accommodation in line with relevant standards;
  - (iv) Servicing access and a safe drop off point within 50m of the main entrance and appropriate for ambulance/mini bus drop-off; and
  - (v) Provision of accessible communal outdoor space for use by residents, staff and visitors which must be of a good quality and which is designed - in terms of its shape, position and location within development proposals - to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
- F. The council will resist development which involves the loss of floorspace in specialist older peoples accommodation unless:
- (i) adequate replacement on-site accommodation will be provided that satisfies Part D or Part E; or
  - (ii) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part D or Part E; or
  - (iii) the applicant can robustly demonstrate that there is a surplus over a long-term of this housing type in Islington; and
  - (iv) it can be demonstrated that the existing accommodation is unsatisfactory for modern standards and/or not fit for purpose.



3.104 Islington is expected to experience growth in its older population as part of the long term trend in population growth<sup>10</sup>. The proportion of older people in Islington is currently below the London and UK average, and is not projected to change substantially with growth and will likely remain below the London average for the foreseeable future. Older people's needs vary with the majority expected to remain housed in existing housing stock, with some demand for down-sizing in response to changing lifestyle. Demand for various types of accommodation for vulnerable older people exists and new accommodation will be supported in exceptional circumstances. Extra care accommodation will not be supported as a priority due to its cost, which is often inflated due to provision of 'luxury' communal facilities that are not a necessary component of care.

3.105 Accommodation for older people will be met through conventional housing designed to be adaptable/wheelchair accessible, in line with policy H4. More specialist accommodation (with varying elements of care) may also contribute to meeting some vulnerable older people's need where it is affordable. The future accommodation needs for older people are considered in the SHMA which demonstrates varying levels of need depending on the base data. The London Plan contains a benchmark which is intended to help inform a local level assessment, however it is considered that the only local solution is to meet most of this need through conventional housing with some exceptions for affordable extra care units to meet defined local need. Where affordable extra care units are deemed acceptable (only through engagement with the council's Adult Social Care team), provision will be offset against affordable housing requirements of a scheme.

3.106 The London Borough of Islington Housing Strategy sets out the intention that the borough will increase levels of independence both for older people and various other groups of dependent people. For older people this includes both physical adaptations and improvements within the home in combination with other social measures of support such as care services, in order to sustain people in their own homes for as long as possible. More general levels of accessibility in the wider public realm is also an issue and can also help enable people to remain in their homes for longer; policies which make streets more liveable can help to remedy this. Islington has a strong record in delivering accessible development.

3.107 The range of specialist Housing designed for older people can be referred to under various terms including sheltered housing/accommodation, extra care housing/accommodation, and residential/nursing care homes. Supported housing for other vulnerable groups is covered under policy H9 below. Islington will consider which Use Class a proposal falls into on case-by-case basis, although extra care facilities will generally be considered to be C3 use unless they include a significant element of care. Development proposals must provide details of:

- care aspects, including qualifying age, entry criteria, minimum expected numbers of care hours per week and the proportion of residents expected to need different levels of care; and
- how the facilities are to be funded and managed.

3.108 The council will consider the use of Section 106 agreements to secure:

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<sup>10</sup> An older person in Islington (for the purposes of policy H7) is defined as 75 or over.

- the involvement of a registered Care Quality Commission care provider in the delivery of care;
- the availability of 24-hour care services for residents to receive/purchase from an on-site team according to their needs;
- the receipt of a minimum package of care services as a requirement for occupation;
- a minimum age of occupants.

3.109 To ensure high quality accommodation is provided the design of specialist residential accommodation for older people (including new build, conversions and extensions) should demonstrate it has considered and addressed a number of key design aspects. To ensure appropriate privacy for residents, elements of a building should be ranked on a scale of ascending privacy, with the most public spaces close to either main entrances or centrally located, and the private dwellings the farthest away from the main entrance. There should be separation between areas just for residents, staff and visitors with a distinction between shared spaces. Provision of communal spaces should be proportionate to the scale of the accommodation and not excessive, optimising the accommodation for residents whilst maintaining the usability of the communal spaces.

3.110 Suitable bathrooms, storage space for equipment and appropriate rooms for activities should be provided. Providing and retaining storage space is important for mobility scooters, hoists and other equipment both in existing accommodation and new provision. In particular, extra care should provide sufficient charging points for scooters, equivalent to 25% of dwellings. Likewise, conversions involving loss of activity rooms / amenity rooms would also need to be justified.

3.111 When determining applications for specialist forms of older people's accommodation, the council may take account of detailed standards and design guidance including (but not limited to) the following documents or any appropriate successor documents:

- The design and build of successful extra care housing – Housing LIN<sup>11</sup>
- Building better care homes for adults – Care Inspectorate<sup>12</sup>; and
- Extra Care Housing Development planning, control and management - RTPPI Good Practice Note 8<sup>13</sup>

## Policy H8: Self-build and Custom Housebuilding

<sup>11</sup> Available from:

[https://www.housinglin.org.uk/\\_assets/Resources/Housing/Housing\\_advice/Design\\_Principles\\_for\\_Extra\\_Care\\_July\\_2004.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/Housing_advice/Design_Principles_for_Extra_Care_July_2004.pdf)

<sup>12</sup> Available from: [http://hub.careinspectorate.com/media/176796/building\\_better\\_care\\_homes-040414.pdf](http://hub.careinspectorate.com/media/176796/building_better_care_homes-040414.pdf)

<sup>13</sup> Available from:

[https://www.housinglin.org.uk/\\_assets/Resources/Housing/Support\\_materials/Reports/GPN8.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/GPN8.pdf)

- A. Proposals including Self-build and Custom build unit(s) will only be supported where:
- (i) They would help to meet an identified need for self-build or custom housebuilding as identified on the Islington self-build and custom housebuilding register;
  - (ii) They make the most efficient use of land, optimising the number of residential unit(s) and level of density that would be expected given the site size, context and layout;
  - (iii) They provide high quality homes in line with policy H4;
  - (iv) They accord with relevant sustainable design policies; and
  - (v) They provide affordable housing in line with policy H3 (either on-site or off-site contribution depending on proposed number of net additional homes).

3.112 Legislation has been introduced and guidance has been published to support an increase in self-build and custom housebuilding. Islington has a duty to keep a register of self-build and custom housebuilding and have regard to that register when undertaking planning, housing, regeneration or land disposal functions. In terms of plan-making, Islington considers that the register forms part of the evidence base of housing need in the borough and appropriate policy has been developed in response to that evidence base.

3.113 Self and custom build are both where an individual, an association of individuals, or persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals. Self-build generally refers to people who bring their own building skills to bear as part of the construction process, whereas custom-build more often involves people who can provide professional services such as architecture or project management.

3.114 Local planning authorities are required to keep a register of individuals and associations who have demonstrated that they meet certain eligibility conditions. Islington's self-build and custom housebuilding register is divided into two parts:

- Part 1 keeps track of local demand for self-build and custom housebuilding which must be met via the grant of sufficient development permissions for serviced plots of land
- Part 2 keeps track of general demand for self-build and custom build, with no requirement to grant sufficient development permissions for serviced plots of land to meet this demand.

3.115 Local planning authorities should use their registers as evidence of demand when developing their Local Plan and associated documents. The Islington SHMA also considers the demand for self-build and identifies that whilst there is some interest, it is only a very limited number of people and a small proportion of the overall housing need identified for the borough. Therefore, whilst the council is supportive of self-build and custom build in principle it does not consider that it will make a significant contribution to meeting housing need in the borough. Given the highly urbanised context, with a constrained supply of land, high land costs and the need to make

efficient use of sites, the potential for people to acquire sites to build their own homes – which is the fundamental goal of the legislation - is likely to be very limited.

## Policy H9: Supported Housing

- A. The council will support the provision of new supported housing where:
- (i) it meets an identified need, including larger-than-local need;
  - (ii) it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence, and provides the necessary level of supervision, management and care/support. Regard should be had to Policy H4 and any relevant best practice standards related to the specific type of accommodation and the people/groups it is targeted to;
  - (iii) There is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and
  - (iv) The use of a site is optimised for all types of housing (particularly genuinely affordable housing), in line with Policy H2.
- B. The council will resist the loss of supported housing unless:
- (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group;
  - (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported housing; or
  - (iii) it can be demonstrated that the accommodation is not fit for purpose for its current use or other relevant types of supported housing.

3.116 The purpose of supported housing is to enable people to live as independently as possible within their community, with a real focus on social inclusion. There are specific needs across a wide range of supported housing types including permanent, long term and shorter term time scales which meet temporary need. These can include foyers for young people, refuges, and long-term accommodation for people with ongoing support needs. The wide range of supported housing types may also include accommodation referred to as hostels (which may or may not have an element of care, but are distinct from visitor accommodation hostels). In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements.

3.117 Optimisation should take into account the use class and specific requirements of the particular supported accommodation proposed; where the supported accommodation is more sensitive, a mix of housing uses may not be appropriate

3.118 Islington will consider supported housing to be any housing scheme where housing, support and, where relevant, care services are provided (or capable of being provided) as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently. Other, semi-independent living options are designed to help people develop the emotional and practical skills needed to move into more mainstream housing and provide varying levels of support. Support can

include help with health needs, including mental health, drug and alcohol use, managing benefits and debt, developing daily living skills and accessing education, training and employment. Supported housing provision may be necessary for a range of people/groups<sup>14</sup> including:

- People with Mental Health Problems
- People with Learning Disabilities
- People with a Physical or Sensory Disability
- Single Homeless with Support Needs
- People with Alcohol Problems
- People with Drug Problems
- Offenders or People at risk of Offending
- Mentally Disordered Offenders
- Young People at Risk
- Young People leaving Care
- Women at Risk of Domestic Violence
- People with HIV/AIDS
- Homeless Families with Support Needs
- Refugees
- Teenage Parents
- Rough Sleepers

3.119 Existing supported housing will be protected where need exists and the accommodation remains suitable, unless it is adequately replaced. Adequate replacement can occur on-site or off-site and will be considered in terms of both quality and quantity of accommodation replaced in line with relevant best practice standards and continuation of a service. Off-site replacement may be acceptable but will depend on the new replacement location and its accessibility.

3.120 There will be a need for proposals to demonstrate where accommodation is no longer needed for particular groups. This should be considered at both a local and a sub-regional level to ensure that varying changes in provision at a wider scale are considered. Changes in service delivery can render accommodation outdated and no longer fit for purpose. Where loss of such accommodation is proposed, this must be evidenced including information which shows that refurbishment is not possible. Accommodation must be proven to be not fit for purpose for the existing specific supported housing and for other relevant types of supported housing which could reasonably occupy the accommodation. In some cases, a development may be deemed to provide units within both the C2 and C3 Use Classes or a replacement use may change Use Classes.

3.121 Proposals involving the loss of existing supported housing should take every opportunity to meet unmet need(s) for other relevant types of supported housing. There are a range of supported housing need(s) which will need to be considered, with differing design considerations to be taken account to assess the feasibility of utilising existing provision. Consultation with the Councils Housing department, Adult Social Care department or Children's Services department must occur as part of evidencing meeting unmet need.

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<sup>14</sup> The relevant policy for accommodation related to older people, which may include housing which could be referred to as supported housing, is policy H7.

## Policy H10: Houses in Multiple Occupation (HMOs)

- A. The council will support the provision of new small-scale HMOs where they:
- (i) Contribute to the mix and balance of uses in an area and do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood;
  - (ii) Do not result in the loss of existing larger family housing (3-bed units or more); and
  - (iii) provide a good quality of accommodation within non-self-contained units, consistent with policy H4 and other HMO best practice standards.
- B. Proposals involving the loss of good quality HMOs will be resisted, unless the replacement use meets an acute need identified by Islington Council's housing department, particularly genuinely affordable housing.
- C. Proposals for large-scale HMOs will generally be refused as they limit capacity to deliver conventional housing, limit the ability to secure genuinely affordable housing tenures and are not considered to be a sustainable model of residential development in line with Local Plan objectives. On sites where the council considers that large-scale HMOs may be an acceptable form of housing in principle, proposals must:
- (i) contribute to the mix and balance of uses in an area and do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood. Sufficient evidence – including a detailed management plan - must be provided;
  - (ii) be consistent with all relevant parts of policy H2 and H4. With regard to minimum space standards, living space and communal space must be comfortable and functional for the needs of tenants and should include adequate space for storage;
  - (iii) provide on-site genuinely affordable housing in line with policy H3. Cash in lieu payments will not be acceptable in any circumstances; and
  - (iv) provide appropriate communal facilities and services.

3.122 There are various definitions associated with the term 'House in Multiple Occupation' (HMO). Within Islington, an HMO is defined as residential property that takes the form of shared houses, flats and non-self-contained units/housing let to three or more unrelated tenants who form two or more households and share a kitchen, bathroom or toilet. Households are families, including single persons and co-habiting couples. In terms of planning use class, there are two scales of HMO. A small-scale HMO (Use Class C4) is where between 3 and 6 unrelated people share basic amenities such as a kitchen or bathroom. All other HMO are considered large-scale HMO and are classed as a sui generis use. Large scale HMO are sometimes called co-living or shared living.

3.123 There is a permitted development right to allow change of use between conventional self-contained housing in Use Class C3 and small-scale HMO in Use Class C4. If it becomes apparent that this permitted development right is impacting the mix and

balance of uses in an area, and/or is causing significant amenity impacts for local residents then the Council will consider removing this permitted development.

- 3.124 In accordance with housing legislation, the council's Environmental Health team licences some HMOs. Agreed minimum standards for room sizes and the provision of kitchens and bathrooms are used to determine the maximum number of occupiers and households for an HMO licence. These were designed as minimum standards to protect the health of occupants in existing property by ensuring adequate facilities and space for the number of people a HMO is licensed for. In the case of new development, the council considers that the higher space standards set out in the policy should be possible. For planning purposes, the minimum standards will be a relevant consideration for all HMOs, not just HMOs which trigger the licensing requirements.
- 3.125 The loss of good quality HMOs will be resisted. Good quality HMOs are those that provide sufficient internal space, provide occupants with a reasonable standard of amenity, and do not give rise to significant adverse amenity impacts to the adjacent and/or surrounding residential neighbourhood. The council will exercise a general presumption in favour of protecting HMOs that could be improved to meet standards without conversion. The council's Environmental Health team will be consulted on a case-by-case basis, to assist with determining what constitutes 'good quality'.
- 3.126 Large-scale HMOs will be refused unless they can demonstrate to the council that on-site genuinely affordable housing can be secured; and that they are not constraining the delivery of conventional residential uses. Evidence should also be provided to demonstrate that there is actual demand for what is currently a niche style of accommodation that, while attractive to some limited parts of the population, is unlikely to be sustainable model of development in the long term (especially for a range of household types including families), and hence could lead to land in Islington effectively being wasted if demand for such accommodation was to reduce in future.
- 3.127 Where large-scale HMOs meet initial policy requirements and are acceptable in principle, proposals will need to address specific criteria, including provision of on-site genuinely affordable housing in line with policy H3. The large-scale HMO format would in such cases be the format for the private/market element of housing; the affordable provision should be conventional self-contained units. Due to the style and operation of large-scale HMO accommodation, pepper-potting of affordable provision with HMO units will not be appropriate. Affordable housing should therefore be separate to the HMO units, including separate access. Tenure blind principles must be adhered to, alongside other relevant Local Plan policies including policy H4. Sites which cannot provide separate affordable housing (e.g. due to constraints with site size, inability to provide multiple cores) will not be considered acceptable for large-scale HMO use in principle, and will be refused.
- 3.128 For avoidance of doubt, large-scale HMOs cannot be seen as affordable accommodation. Comparisons between the rental cost for an HMO bedspace and conventional housing (Use Class C3) should not be made on the basis of units, given that the space and living quality of HMOs can be drastically different. Comparisons are only relevant on a per square metre basis, which means that disparity of size is factored in. Where non-standard communal facilities are provided, these should be discounted from any comparisons with conventional housing costs.
- 3.129 Living space and communal space must be comfortable and functional for the needs of tenants and should include adequate space for storage. What constitutes comfortable and functional should be determined on a case-by-case basis, but

relevant Environmental Health standards and private internal space standards set out in the London Plan should be used as a reference point.

- 3.130 The achievement of mixed and balanced communities is a key objective of the Local Plan; it is important for maintaining community cohesion, diversity and character. New housing development can have a significant impact on the achievement of mixed and balanced communities, and relatively high cost tenures like large-scale HMOs can potentially lead to residential enclaves shut off from the community at large; co-living/shared living is often advocated as a way of facilitating communal interaction, but this should apply to the wider community not just those living within the development. Proposals for large-scale HMOs must contribute positively to the mix and balance of uses in an area and demonstrate that any adverse amenity impacts on the surrounding neighbourhoods and communities are prevented.
- 3.131 A robust management plan is essential, to prevent adverse amenity impacts on the surrounding area and also to ensure that the development is properly managed. A management plan must be submitted as early as possible, ideally at pre-application stage. All large-scale HMOs must be managed by a single company/organisation with minimum six-month tenancy lengths; shorter tenancies risk damaging any sense of community through constant turnover of residents. They also blur the lines between short-term let accommodation, turning large-scale HMOs in de facto hostels/visitor accommodation which would further undermine the ability to genuinely meet housing need.
- 3.132 The management plan must set out how the HMO element of the development will interact with on-site genuinely affordable housing, in addition to details on how all other facets of the development will operate, from move-in and move-out arrangements and maintenance of communal areas, to staffing and security arrangements and responsibilities. The exact scope of a management plan should be agreed with the council on a case-by-case basis. Where applications for large-scale HMOs are permitted, adherence to the provisions set out in the management plan will be secured through S106 agreement.
- 3.133 Kitchens, amenity space (internal and external) and laundry facilities are considered appropriate, essential communal facilities for large-scale HMOs. Provision of non-standard 'luxury' communal facilities – such as swimming pools, cinemas, gyms - which inflate development costs will not be considered an acceptable reason for any policy non-compliance with regard to any other aspect of the development, particularly affordable housing.

### **Policy H11: Purpose Built Private Rented Sector development**

- A. Proposals for purpose built Private Rented Sector (PRS) development will not be permitted unless it has been robustly demonstrated, to the council's satisfaction, that more conventional models of housing delivery are undeliverable; and where there will be no adverse impacts on local amenity and the mix and balance of uses in the area (including considerations of prevalent housing tenures).



- B. Where the principle of PRS is accepted in line with Part A, PRS proposals must comply with all of the following criteria:
- (i) Units must be self-contained and let separately;
  - (ii) On-site genuinely affordable housing is provided in line with policy H3. Affordable Private Rent (APR) is not considered to be an acceptable affordable housing tenure;
  - (iii) High quality housing is provided in line with policy H4. All units should be self-contained;
  - (iv) The PRS units are held under a covenant for the lifetime of the building, generally no less than 50 years. The covenant should be strictly enforced and should not allow any provision for general market sale of any units (either individually or as a group of units), for the length of the covenant period;
  - (v) A clawback mechanism is put in place to ensure that the maximum amount of affordable housing is provided on-site where the covenant is broken (notwithstanding criterion iv);
  - (vi) Unified management and unified ownership of the development is guaranteed throughout the covenant period;
  - (vii) Longer tenancies (three years or more) are available to all tenants. The tenancy process should give security to the renter, with appropriate break clauses and transparency on rent increases enshrined in the tenancy agreement. Upfront fees during the letting process should not be charged, except for security deposits and upfront rent payments.

3.134 For the purposes of policy H11, Purpose Built Private Rented Sector development (commonly known as 'Build to Rent') is non-owner-occupied self-contained dwellings that are built with the intention of being rented out as housing, (rather than sold) from the outset. These developments often claim to have 'distinct economics' due to the fact that they are rented not sold, which in turn is used as an argument for a more flexible approach to policy requirements including provision of affordable housing.

3.135 The schemes are intended for institutional investors as a means to increase housing supply through varying the housing product mix and stimulating a faster delivery rate. Both the Government and Mayor have supported provision of more private rented homes and a more positive approach in enabling purpose-built PRS to contribute to the achievement of housing targets. However, in Islington there is little evidence to suggest that the reasons for this support for purpose built private rent exist and any delivery would not be the best use of land and be inconsistent with the strategic aims of the local plan.

3.136 In Islington there is no evidence of an issue of housing delivery in particular the issue of absorption and developers release rate to market. Sales values are strong; with no shortage of investors but there is a shortage of land. PRS would not serve to meet any affordable need due to very high market rent levels. The delivery of so called Build to Rent cannot demonstrate the same viability as a market sales proposal can and therefore cannot maximise the provision of affordable housing. As set out in Policy H3, APR at high percentages of market rent will also not be acceptable as part of any

'Build to Rent' development, as they would not contribute toward meeting identified housing need and would validate the perception that 'Build to Rent' is a wasted opportunity for conventional housing which could provide more priority affordable tenures such as social rent.

3.137 PRS should provide genuinely affordable housing, for example through the provision of London Living Rent units or provision of units with rents akin to social rent. APR at high percentages of market rent will not be acceptable as part of any 'Build to Rent' development, as they would not contribute toward meeting identified housing need. In addition, developers must enter into a covenant to ensure that PRS schemes commit to provide rental accommodation for the lifetime of the building, during which period no sales out of the covenant will be allowed. In exceptional circumstances, where it is agreed that sale out of the covenant can take place, this will only be suitable where it involves sale of all PRS units. Such a break in the covenant will trigger a clawback mechanism requiring the maximum reasonable amount of affordable housing, in line with the Local Plan affordable housing requirements. The clawback should provide for provision on-site by identifying specific units that will be converted to genuinely affordable housing which reflects the tenure split set out in policy H3, particularly social rented housing. Provision of clawback through financial contributions is generally not acceptable.

3.138 Section 106 agreements and covenants should be carefully worded in order that the construction of the units would be VAT zero-rated; affordable housing units will not be subject to a minimum covenant period and will always be secured in perpetuity.

3.139 Ensuring housing quality is just as important for PRS development as for conventional market housing. All requirements set out in policy H4, including minimum space standards, will need to be complied with along with other policies in the Local Plan such as those requiring car-free development and cycle parking.

## **Policy H12: Gypsy and Traveller Accommodation**

- A. Gypsy and Traveller accommodation will be provided where a defined need is demonstrated through the council's evidence.
- B. Where a need for accommodation is demonstrated, depending on the level of need the council will provide guidance on how this need could be met - including through a potential review of Site Allocations if considered necessary - and/or work with other boroughs to determine scope for accommodating need elsewhere.
- C. In the absence of a particular site allocation to meet defined need, the following windfall policy will apply. Any site proposed in order to meet a defined need must:
  - (i) have suitable access for the type of vehicles that could reasonably be expected to use the site;
  - (ii) be able to provide basic amenities, including water and sewerage;

- (iii) provide a good level of residential amenity, in line with relevant policy requirements set out in policy H4;
- (iv) not have any relevant pre-existing policy designations that restrict the use of the site, including green infrastructure such as Metropolitan Open Land; and
- (v) The site is not allocated for other uses, e.g. conventional housing, offices.

- 3.140 There is no history of need for Gypsy and Traveller accommodation in Islington, aside from some families in permanent accommodation who consider themselves to be Gypsies/Travellers and may need to return to non-fixed accommodation in the future.
- 3.141 The definition applied to Gypsies and Travellers makes a significant difference in terms of the assessment of accommodation needs. The definition set out in the Government's Planning Policy for Traveller Sites (PPTS) excludes certain groups of Gypsies and Travellers, for example those who have ceased to travel permanently. However, the London Plan definition includes those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them, by virtue of their cultural preference not to live in bricks and mortar accommodation. The London Plan definition also considers those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently. The effect of these different definitions would need to be considered as part of any assessment of need. Islington would have limited need using the London Plan definition, but no need using the PPTS definition.
- 3.142 Previously the council has worked with the Greater London Authority on a pan London study, the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment 2008. This identified Islington having a minimum need for zero pitches and a maximum need from Gypsies and Travellers currently living in housing for three pitches between 2007 and 2017. The need of three pitches was in part based on the "proven psychological aversion" for those surveyed in housing accommodation. The council considers that the assessment of need should be done at the sub-regional level, which would better reflect the constraints and current level of provision in individual boroughs. The majority of need for Gypsy and Traveller accommodation is focused in Outer London.
- 3.143 Despite this, the council is progressing a local needs assessment ahead of finalising the Local Plan. Regardless of the outcome of this work, the context of the borough – the shortage of vacant sites, very high land values and the pressure to meet significant need for conventional housing and business floorspace (amongst other uses) - mean there will be limited (if any) opportunities to provide Gypsy and Traveller pitches even if a need is identified. The council will seek to identify site(s) to meet any defined need in the Site Allocations document, and/or working sub-regionally with other boroughs. The policy also sets out assessment criteria for any windfall applications for Gypsy and Traveller accommodation.

## Policy SC1: Social and Community Infrastructure

- A. The council will support proposals to provide new and/or extended social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies.
- B. Social and community infrastructure will be funded through the Community Infrastructure Levy (CIL) and/or section 106 planning obligations (as appropriate). In addition, new and/or extended on-site provision of social and community infrastructure may be required where necessary, as part of the supporting infrastructure for significant new housing and mixed-use development proposals, in order to mitigate the impacts of the development on local services and meet the needs of occupiers.
- C. Where new and/or extended social and community infrastructure is provided on-site it must be designed in line with criteria in part G.
- D. The council will not permit any loss of social and community infrastructure uses unless:
  - (i) a replacement facility is provided on-site, offering a level of accessibility and standard of provision at least equal to that of the existing facility, and consistent with criteria in part G, which would, in the council's view, meet the need of the local population for the existing use; or
  - (ii) the existing use or another social and community infrastructure use is not required on site, demonstrated through:
    - a. provision of marketing and vacancy evidence to assess continued demand for the existing use and all other suitable social and community infrastructure uses that could be accommodated on site. Evidence should be provided for a period of at least 12 months, in line with Appendix 1; and
    - b. provision of a Community Impact Assessment detailing why the site cannot support social and community infrastructure uses and why the existing use is no longer required on site as well as demonstrate that they have considered the needs and views of service users before making recommendations/submitting proposals involving replacement or relocation or consolidation of services; or
  - (iii) The proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's estates programme. The applicant will be required to provide a Community Impact Assessment demonstrating details of rationalisation, including that they have considered the needs and views of service users as part of any rationalisation strategy.
- E. Where, in the Council's view, there is an ongoing need for the service/facility currently operating from the site and it cannot be re-provided as part of the proposed development, its loss will not be permitted unless the applicant has secured equivalent provision which meets criteria set out in part G. The Community

Needs Assessment must demonstrate that they have considered the needs and views of service users as part of recommendations/submitting proposals involving the loss, relocation or consolidation of services.

- F. Development resulting in the provision of new social and community infrastructure that is not generally accessible to the public, such as school sports facilities, will be required to enter into Community Use Agreements to allow and promote access by local communities to the facility.
- G. New social and community infrastructure and, where applicable, extensions to existing infrastructure must:
  - (i) be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes, including walking, cycling and public transport;
  - (ii) provide buildings that are inclusive, accessible, flexible, sustainable and which provide design and space standards which meet the needs of intended occupants;
  - (iii) provide appropriate drop-off/pick-up facilities for disabled people;
  - (iv) be sited to maximise shared use of the facility, particularly for recreational and community uses; and
  - (v) complement existing uses and the character of the area, and avoid adverse impacts on the amenity of surrounding uses.
- H. Proposals involving new/redeveloped social and community infrastructure should provide free, publicly available provision of accessible toilet, baby change and drinking water facilities. 'Changing Places' toilets will be required in appropriate social and community facilities.

3.144 Islington's social and community infrastructure comprises a wide range of facilities and services, such as hospitals, doctors' surgeries, nurseries, schools, leisure centres and sports facilities, libraries, community centres and recreational and play spaces. The council strongly supports the retention of this infrastructure, which makes a crucial contribution to the mental and physical well-being, learning and education, and sense of place and community of Islington's residents.

3.145 Social and community infrastructure contributes to sustainable communities by providing venues for a wide range of activities and services, including accommodation for Islington's active voluntary and community sector, meetings and events, which add to its diversity and interest. There is a need for a range of community and social facilities in the borough to support community needs. To maintain sustainable communities, provision of new social infrastructure will be expected as part of significant new development proposals. New social infrastructure should be designed with consideration for all users from the outset.

3.146 Proposals involving the loss of social and community infrastructure will be resisted and all reasonable efforts should be made to preserve existing facilities in community use and/or re-provide facilities on-site, including active marketing for a range of other suitable social infrastructure uses. There may be some instances where proposals involve loss/reduction/relocation of social and community infrastructure in response to changing community needs or services. Any proposals involving loss of social and

community infrastructure should demonstrate, through provision of a Community Needs Assessment, that the facility in its current form is no longer needed or able to meet community needs.

3.147 The scope and content of the Community Needs Assessment will be judged in proportion to the scale and significance of the change in provision being proposed. The scope of the Community Needs Assessment will need to be agreed with the council at the earliest possible stage of the planning process, ideally pre-application stage. The following will be expected to be covered by all Community Needs Assessments as a minimum; additional evidence may be necessary depending on the change of community use proposed:

- Evidence which demonstrates understanding of service users and expected users and former users where needs have declined;
- Explanation of the change in service, and how the service will be better provided elsewhere;
- Details of why the facility no longer meets specific needs because of physical constraints of the site/facility or changing user requirements; and
- Evidence of consultation with existing/former users of the social and community infrastructure in relation to the proposed changes.

3.148 Proposals involving the loss or reduction of the public sector body's estate as part of a recognised asset/estates rationalisation programme may be acceptable, where details are provided to demonstrate how rationalisation is addressing the existing and future community needs. A recognised public sector body's estates programme can include those produced for the following types of organisation:

- Hospital trusts and other health organisations.
- The emergency services (Metropolitan Police Service, London Fire Brigade, London Ambulance Service).
- Community premises.

3.149 To ensure high quality social and community infrastructure is provided, the design of facilities should demonstrate it has addressed a number of key design aspects, including the need for infrastructure to be inclusive, accessible, flexible and sustainable.

3.150 Ensuring convenient access to buildings is important to ensure that a range of people can readily access services. Building/site entrances should be clearly identifiable with level access. Ensuring safe vehicle drop off within 50m of the entrance is important to meet needs of disabled people. The internal design of buildings will be expected to demonstrate that they meet the needs of a range of users considering for example, entrance lobbies, waiting areas, circulation space, access between floors and emergency egress and evacuation. Further guidance is contained in Inclusive Design SPD.

3.151 Social and community infrastructure should be located in areas convenient for the communities they serve and accessible by a range of sustainable transport modes; such as on major thoroughfares and locations in close proximity to bus stops, although there may be flexibility depending on the type of infrastructure being provided. Facilities should integrate with the surrounding area and create or enhance places where people using facilities feel welcome. Co-location of services by different providers is strongly encouraged subject to complying with all other policy requirements.

- 3.152 Where new community spaces are proposed as part of new development, the council's Voluntary and Community Sector team should be consulted, to gauge the necessity for such space, taking into account existing provision in the area. Provision of unnecessary space may result in opportunities for other development being lost.
- 3.153 Sport and recreation facilities should adopt inclusive design standards to ensure that everyone has the opportunity to take part in sporting activity, in line with relevant best practice and guidance issued by Sport England and other relevant bodies/organisations.
- 3.154 Where appropriate, social and community infrastructure should incorporate Changing Places WCs; this is a toilet for people with profound and multiple learning disabilities which has enough space for disabled people and their carers; and the right equipment, including a height adjustable changing bench and a hoist. Depending on the scale of a proposal, the following infrastructure may be considered appropriate for Changing Places WCs:
- sport and leisure facilities.
  - cultural centres, such as museums, concert halls and art galleries.
  - stadia and large auditoria.
  - town halls, civic centres and main public libraries.
  - educational establishments.
  - health facilities, such as hospitals, health centres and community practices.

## Policy SC2: Play space

- A. The council will strongly resist the loss of existing play spaces across the borough unless:
- (i) replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Any replacement space should be provided on-site or in the immediate vicinity, and access should be unrestricted; or
  - (ii) It can be demonstrated robustly that the space is no longer required and that its loss would not lead to a shortfall in overall play provision in the local area, including consideration of demand from planned (but not yet built) developments.
- B. The Council will protect all twelve of the borough's adventure playgrounds designated on the Policies Map.
- C. All major residential development should make appropriate on site provision for free-to-use publicly accessible play space, which is suitable for children and young people of all ages and abilities. Provision should be proportionate to the anticipated increase in child population as a result of development proposals. All proposed provision of new play space within development sites should be designed in partnership with Islington Council, in line with any relevant best practice standards.
- D. All developments (including large-scale public realm schemes) should provide playable public space, in addition to any formal play space provision. This play space should encourage children and young people to move around freely and

safely through streets and footpath networks that connect to more formal play provision, green spaces and parks.

- 3.155 Play provision should be inclusive and suitable for children and young people from all abilities, employing the principles of inclusive play. Increased physical activity contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction. In order to facilitate greater physical activity, it is important that children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision.
- 3.156 Major housing developments are expected to make appropriate provision of play space. In determining the amount of play space required the Council will consider the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development. The Council will take into consideration the London Plan benchmark for 10sqm of play space to be provided per child as a starting point, but it is recognised that in Islington's context, delivery at this level may not always be feasible.
- 3.157 Play space can include communal outdoor space, private outdoor space, and gardens suitable for play. Communal gardens and other outdoor spaces suitable for play, including communal amenity space, may be considered to contribute towards play space provision where they have distinct playable elements; however, developments should provide publicly accessible play space where possible, rather than provision being entirely from private space. Where formal play space is provided it should be free, accessible, and integrated into any wider networks of open space. Where possible, minor developments are also required to provide informal play space.
- 3.158 Such proposals should be accompanied by detailed plans which should include a detailed design for play provision. Reference should be made to best practice standards and also any relevant guidance or strategies, in particular any Islington specific play strategy. Proposals should also include information detailing proposed future management and maintenance arrangements for any play space secured. This plan shall be conditioned by the council as part of any permission.
- 3.159 Play and informal recreation areas should incorporate trees and greenery wherever possible and form an integral part of a child friendly built environment. This involves making the whole of the public realm safe, welcoming and enjoyable for children and young people. Streets, pavements, walkways and various forms of public open space have the potential to be treated as incidental spaces for play. Appropriate inclusive play provision should be included for different age groups on site.
- 3.160 Play provision should encourage an element of positive risk taking and incorporate provision for natural play, which may be provided in formal play space, informal play space, and throughout the landscaping and open spaces of developments.
- 3.161 The Council supports the concept of playable public space. Playable space involves alterations to spaces outside of playgrounds which make them more usable for children's active play. A playable space is one where children and young people's active play is a legitimate use of the space. Playable space can be provided in a range of places including on local streets and parks, or on the public realm of private developments, and can allow children to safely move around neighbourhoods more independently; this involves reducing traffic volumes and speed. Such spaces should



present physical and sensory challenges whilst managing appropriate risks, meeting the needs of different people at the same time.

- 3.162 Playable spaces often feature engaging elements that signal and welcome use by children and young people, such as landscaped mounds, decks, climbing elements boulders, logs, planting, undulating landscapes, water features. These features should be orchestrated in a way that is easily navigated, without the use of formal signage. The use of additional scented or tactile clues can enhance legibility for all users. Some quiet areas that have gentle sensory experiences benefit children, enriching their play experience at different paces.

### **Policy SC3: Health Impact Assessment**

- A. The council will require all major developments, and developments where potential health issues are likely to arise, to complete a screening assessment as early as possible in the development process, to determine whether a full Health Impact Assessment (HIA) is required.
- B. Where the screening assessment identifies that a full HIA is required, this should be prepared as early as possible in the development process so that potential health gains can be maximised and any negative impacts can be mitigated. HIAs, where required, should be proportionate to the scale of the development.
- C. The scope of any HIA should be agreed with the council's Public Health department, and should be informed by relevant council guidance.

- 3.163 Improving health and reducing inequalities are key considerations that the Council assesses through the planning system. Healthy lifestyles are encouraged through good urban design, good quality accessible open space, access to active travel such as walking, cycling and public transport, clean air, access to good quality employment opportunities and access to good quality affordable housing.

- 3.164 The Health Impact Assessment (HIA) process is an integral part of the assessment of specific planning applications. It ensures that relevant schemes enhance health benefits and mitigate any identified impacts on the wider determinants of health, i.e. social determinants of health, well-being and inequalities.

- 3.165 All major developments, and developments where potential health issues are likely to arise, must complete a screening assessment (as a minimum) as early as possible in the development process, to determine whether a full HIA is required. Developments where potential health issues are likely to arise may include hot food takeaways and betting shops.

- 3.166 Sensitive locations in proximity to the development should be considered in screening and any subsequent HIA. Sensitive uses include schools, child care centres, hospitals, older persons' facilities and other sensitive activities.

3.167 The council have produced guidance on the HIA process. All relevant proposals should have regard to this guidance when screening for HIA or subsequently preparing an HIA. The scope of any HIA should be agreed with the council's Public Health department.

# 4 Inclusive Economy

## Delivering an inclusive economy

- 4.1 The council is currently developing its overarching strategy for delivering an inclusive economy. An inclusive economy works better for local people and benefits the community as a whole. It is an economy where:
- inequality is declining rather than increasing;
  - people are able to participate fully in community and economic activity, with a greater voice and say over their future;
  - secure and well-paid work opportunities – with increasing incomes – are available for a wide range of people, especially for poor and excluded communities;
  - individuals, households, communities and businesses are secure enough to invest in their future and sustain a level of wealth and wellbeing to enable a stress-free cost of living;
  - there is greater diversity of businesses, with a range of smaller businesses; worker co-operatives and social enterprises, rather than being dominated by a small number of larger firms;
  - more money generated in the local economy stays in the local economy; and
  - growth is balanced against consideration and mitigation of environmental impacts.
- 4.2 This inclusive economy model can deliver wider social, economic and environmental benefits in a more holistic manner than more conventional economic models, which heavily prioritise growth above other considerations with limited (if any) subsequent direct or indirect benefits for local economies (e.g. trickle-down).
- 4.3 The council's Inclusive Economy Strategy will expand on the concept of an inclusive economy, and provide clarity on what an inclusive economy in Islington looks like. The strategy will include a number of objectives to deliver an inclusive economy in the borough.
- 4.4 Planning is an integral part of this delivery, particularly maximising opportunities for the growth of micro and small businesses, e.g. by providing affordable workspaces; and ensuring that the borough's Town Centres, high streets, and street markets continue to be successful places for local businesses to trade and thrive. Chapter 4 of the Local Plan outlines a range of planning policies which will enable delivery of these key elements of an inclusive economy.

## Business floorspace

### Policy B1: Delivering a range of affordable business floorspace

- A. In line with the Local Plan objectives, in particular the aim to deliver an inclusive economy, the council will seek to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types and unit

sizes, which are affordable for a range of occupiers, including established and emerging enterprises, and SMEs.

- B. New business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas of Angel and Upper Street; and Kings Cross and Pentonville Road, Priority Employment Locations and Locally Significant Industrial Sites. Proposals in these areas must maximise the amount of new business floorspace; proposals which do not demonstrate maximisation will be considered to be an inefficient use of a site and will be refused.
- C. The council is committed to ensuring there is an adequate supply of business space in line with job growth projections and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, at least, no net loss of business floorspace, and through the making of Article 4 Directions, where appropriate.
- D. The council will aim to secure space that fosters the development and expansion of businesses, particularly space suitable for start-ups and small businesses. This includes the delivery of affordable workspace; and the provision of small units suitable for SMEs.
- E. Islington's Locally Significant Industrial Sites are the focus for new industrial uses, namely B1c, B2 and B8 uses. Existing industrial uses will be safeguarded, and their renewal, modernisation and intensification will be encouraged.
- F. Development in the borough must provide jobs and training opportunities/support.

4.5 The council aims to create an economy where the benefits of economic success are shared across the different sections of society. An inclusive economy cannot be achieved through planning alone, but requires joint working between developers, economic agents and the various parts of the council. From a planning perspective, achieving an inclusive economy can be done through:

- ensuring a sufficient supply of business land and floorspace to facilitate future job growth;
- ensuring that business space meets the needs of businesses; and
- securing jobs and training opportunities from new development.

4.6 Business floorspace in this chapter is considered to be activities or uses that fall within the B-use class (i.e. offices, industry, or warehousing) and some Sui Generis uses which are akin to business uses, such as building merchants and depots. Employment floorspace is a broader term which refers to activities or uses that generate employment, including offices, industry, warehousing, showrooms, hotels, retail, entertainment, educational, health and leisure uses (regardless of whether the end occupier is private, public or charity sector).

4.7 Islington has a strong and prosperous economy. It has grown significantly in recent years and is set to grow even further. Evidence produced by the council demonstrates an unprecedented high need for additional business floorspace – 400,000 sqm up to the year 2036. Land supply in Islington is highly constrained; the borough is the most densely populated and third smallest (by land area) English local authority. This extremely limited supply and exceptionally high demand means that the council must

do more to protect what is existing and encourage the delivery of new business floorspace.

- 4.8 The council recognises that although it is unlikely that this need will be fully met, given the significant land constraints in the borough as well as competing needs for development of other uses, policies and their implementation must go as far as possible to meet this target. This means that the maximisation of business floorspace delivery is an absolute priority, in addition to housing, whereas the delivery of uses, including other commercial floorspace, can be considered as secondary. In achieving maximisation, a longer term view of viability should be taken, i.e. where there may be short term dips in the market, this should not negatively impact the delivery of business floorspace in the future.
- 4.9 The success of Islington's economy can be attributed to a number of factors, including being located in the Central Activities Zone (CAZ) which accommodates 70% of the borough's jobs and several unique economic clusters which are of national significance. These clusters include Tech City around Old Street; the Clerkenwell Design Cluster; the Kings Cross-Moorfields Eye Hospital corridor which links the Kings Cross life sciences cluster / 'Knowledge Quarter' with Old Street; and the Vale Royal / Brewery Road industrial cluster. There are also a number of smaller scale business centres and industrial areas which are located across the borough.
- 4.10 Islington's economy is made up of a wide range of businesses and organisations, the majority of which are micro (which employ less than 9 staff) and small enterprises, (which employ less than 50 staff). Whilst these businesses make up the vast majority of the borough's enterprises, the majority of jobs come from a few larger businesses, as well as the borough's universities, hospitals, and the council itself.
- 4.11 By 2036, 50,500 additional jobs are expected in the borough, with the majority of this increase within sectors that will require office accommodation. Much of this office growth will be concentrated in the CAZ, Bunhill and Clerkenwell AAP area and the CAZ fringe spatial strategy areas of Angel and Upper Street; and King's Cross and Pentonville Road. These areas are crucial in providing a pipeline of office land capable of meeting the projected floorspace demand. To realise this growth, a range of workspaces that meet the existing and future needs of businesses must be provided. The loss or reduction of existing business floorspace anywhere across the borough will not be allowed. In line with job growth projections, the council will take a rigorous approach to ensuring the maximisation of business floorspace in locations which are identified as the focus for business use. The maximisation of floorspace in this instance, will be where the maximum amount of business floorspace is provided, subject to design constraints or viability. The assessment of maximisation is not prescribed, but may include a requirement for scenario testing of alternate schemes, particularly where proposals involve a mix of uses including non-business uses.
- 4.12 Small and micro businesses rely on smaller spaces, and often in secondary locations, underscoring the need to ensure a sufficient supply, at affordable rates. Development proposals for business floorspace will be expected to provide a range of units in terms of type and size, and major development proposals in specific locations should provide an element of affordable workspace.
- 4.13 Locally Significant Industrial Sites (LSISs) are the focus for B1c, B2 and B8 uses. Existing industrial uses will be safeguarded, and their renewal and modernisation will be encouraged. Non-industrial uses will not be allowed in LSISs. The Vale Royal / Brewery Road LSIS is the largest concentration of industrial uses in the borough. The area is an established cluster of industrial uses and in addition to the more

conventional industrial uses - such as builders' merchants and catering operations - expected in an inner London industrial area, the area is home to a cluster of creative industries and specialist event companies/music orientated businesses. The unique function of this LSIS should be protected and nurtured to allow for an intensification of industrial uses - see policy SP3 for further detail. Other newly designated LSIS exist at Pemberton Gardens, Station Road (Bush Industrial Estate), North Road, Kelvin Road (Frogmore Industrial Estate), and Offord Street. In these other LSISs the industrial function will be safeguarded and renewal and modernisation encouraged.

- 4.14 Despite the prosperous economic environment, Islington experiences a higher than average rate of economic inactivity, meaning that although the number of jobs is increasing, residents in the borough are not necessarily able to access them. The council will seek to ensure that Islington residents benefit from new development and will expect jobs and training opportunities to be provided from major development for local residents.

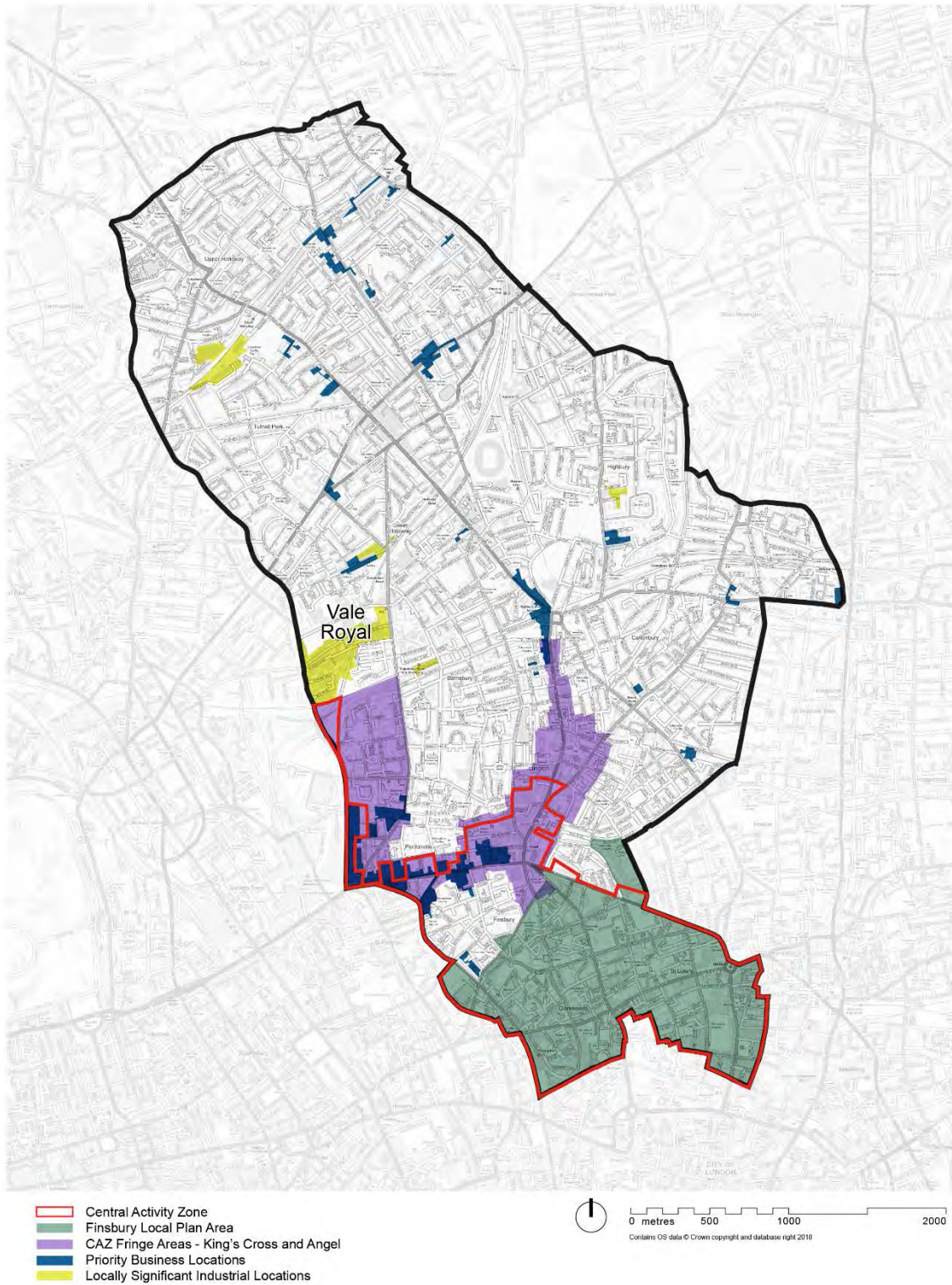
## Policy B2: New business floorspace

- A. Within the following locations (also shown on Figure 4.1), the priority land use is B-use floorspace. The introduction of uses that could undermine the primary economic function of that particular area will not be allowed. Proposals for the intensification, renewal and modernisation of existing business floorspace to support the specific role and function of the following locations is encouraged. Proposals for new business floorspace are required to maximise the provision of business floorspace in line with the following locational priorities. Proposals which are not considered to maximise business floorspace will not be allowed.
- (i) **CAZ and Bunhill and Clerkenwell AAP area:** Intensification of office use to maintain and enhance the area's role in supporting London's strategic business role is a priority. A range of workspace typologies are supported, including Grade A offices, serviced offices, co-working spaces, hybrid workspace and other types of flexible workspace and lower specification office space suitable for SMEs and business services. Residential use will not be supported.
  - (ii) **CAZ fringe spatial strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road:** New business floorspace within Angel Town Centre, particularly on White Lion Street, Pentonville Road and upper floor locations across the Town Centre is encouraged. A variety of business floorspace is encouraged along Pentonville Road and around Kings Cross / York Way, including business space which meets the needs of SMEs.
  - (iii) **Priority Employment Locations:** Growth and intensification of business uses to provide for the SME sector, as well as meeting local/specialist needs, is the focus here. Increasing provision of space that is appropriate to the diverse needs of the SME economy, including secondary space, studios, business centres and co-working space, is supported. Residential use will not be supported.
- B. In Locally Significant Industrial Sites, priority land uses are industrial uses (B1c, B2, B8). The retention and intensification of industrial uses (B1c, B2, B8) and existing clusters of activity in LSISs is a priority. The provision of hybrid space is supported. The development of office use may be permissible where there is existing office floorspace on site, or as part of a hybrid workspace scheme, but it must only

constitute a small proportion of the overall gross floorspace proposed. The introduction of uses that could undermine the primary economic function of LSISs will not be allowed. Residential use is not acceptable within LSISs.

- C. Proposals for B1a and B1c floorspace that meets local and/or wider demand will be supported on upper floors in the Primary Shopping Area of designated Town Centres, and on any floor elsewhere in designated Town Centres and local shopping areas, provided the business use provides an active frontage.
- D. Outside of the locations mentioned in Part A, and designated Town Centres and Local Shopping Areas, new business floorspace will be supported where it would not detract from the character the local area; and would not detrimentally impact on residential amenity. Proposals for new business floorspace in these locations should be accessible to all in accordance with the priority for sustainable modes of transport set out in policy T1, and should not prejudice the overall aim of reducing the need to travel.
- E. All development proposals involving business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following:
  - (i) Business floorspace must allow for future flexibility for a range of occupiers, including future subdivision and/or amalgamation, and provide a range of unit types and sizes, including a significant proportion of small units, particularly for SMEs, and provide full separation of business and residential floorspace, where forming part of a mixed use residential development.
  - (ii) Provision of a good level of amenity for occupiers of the business floorspace, including adequate levels of daylight and sunlight; and access to communal/ancillary facilities including meeting rooms.
  - (iii) The development of new business floorspace should incorporate the highest inclusive design standards achievable in context, and meet the travel and transport needs of those for whom public transport remains inaccessible.
  - (iv) Applicants must clearly demonstrate how the design of proposals individually and cumulatively contribute to providing the range of spaces required to support the primary function/sector of the particular area in which it is located.
- F. Proposals for new industrial and warehousing uses must provide:
  - (i) Satisfactory access and servicing, including off-street loading, appropriate delivery arrangements in line with policy T5, and adequate yard space.
  - (ii) Good quality design which provides space that is adaptable to meet the needs of a range of uses and occupiers, including sufficient clear internal ceiling/eaves heights and loads, and adequate goods lifts.
- G. Where proposed, live-work units will be considered to be C3 residential floorspace and will not be considered business or employment floorspace. Such units will not contribute towards the maximisation requirement set out in Part A of this policy. Existing live/work units are classed as business floorspace; proposals involving the change of use/loss of existing live/work units will be assessed against policy B3.

**Figure 4.1 – Local Plan Employment Designations – Locally Significant Industrial Sites and Priority Employment Locations**





- 4.15 Delivering an increase in business floorspace is a key objective for this Local Plan. The number of jobs in the borough is projected to increase substantially; our evidence suggests that there will be an additional 50,500 jobs in the borough up to 2036. Continued levels of growth are forecast within the professional and technical services sectors, which generate the most demand for office space. These job projections, when translated into floorspace requirements, demonstrate a need for an additional 400,000 sqm of office floorspace. Islington's pipeline of business floorspace has consistently shown a net loss in recent years, and without strong policy requirements, it is unlikely that business floorspace will be delivered at a level that would accommodate the projected employment increases. This demonstrates that Islington has a severely constrained supply-demand balance, where demand greatly exceeds supply.
- 4.16 Growing competition between residential and commercial uses is putting pressure on land markets and has led to an ongoing erosion of business space in Islington, particularly secondary / affordable business space over the last decade. This has been further exacerbated by the introduction of the office to residential permitted development right in 2013. Delivery of an increase in business floorspace is therefore a key priority of this Local Plan, in order to meet economic objectives. The intensification of business uses will be directed to the CAZ, the Bunhill and Clerkenwell AAP area, the CAZ fringe spatial strategy areas of Angel and Upper Street; and King's Cross and Pentonville Road, Priority Employment Locations (PELs) and Locally Significant Industrial Areas (LSISs). The introduction of non-business uses in these areas could undermine their primary economic function and will therefore not be allowed.
- 4.17 Local and regional evidence is clear that the CAZ is the location with the most demand for Grade A office space. Aside from Grade A office space, other workspace typologies are supported in the CAZ. The Bunhill and Clerkenwell AAP sets out an area wide policy to prioritise office space, with detail on the type of workspace required within relevant Spatial Strategies. Maximisation of office floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. The Bunhill and Clerkenwell AAP area covers most of the CAZ within Islington and a small area is outside the CAZ. The CAZ fringe spatial strategy areas - Angel and Upper Street; and King's Cross and Pentonville Road - are also important business locations, as detailed in the respective spatial strategies for these areas. CAZ fringe locations take pressure off the central London office market and can provide lower cost space, in comparison to the CAZ, suitable for SMEs. These areas, particularly along the growth corridors of Pentonville Road, White Lion Street and York Way, are suitable locations where provision of a mix of business spaces - including flexible SME space, secondary offices as well as Grade A office space – will be encouraged.
- 4.18 Outside of the CAZ, there is a growing small business economy which is clustered in business centres across the borough. These Priority Employment Locations (PELs) accommodate a range of spaces to meet the varied needs of occupiers, from secondary offices to studios to business centres and co-working spaces. These locations are where business uses should be prioritised and intensified. Property market indicators show that growing numbers of occupiers are becoming more 'footloose' and these dynamics have encouraged a rapid expansion of the flexible space market. The flexible space market provides serviced offices, 'hybrid' space, light industrial, studio and production space, and co-working space. This type of B1 space is particularly attractive to the small business economy and will be encouraged in existing PELs and Town Centres, provided there is no overall loss of B1.

- 4.19 Islington has one of the lowest levels of industrial stock in comparison to the other central London boroughs, largely due to the significant loss of industrial floorspace in recent years. The Vale Royal / Brewery Road LSIS is the borough's largest concentration of industrial / warehousing / employment land; policy SP3 sets out the spatial strategy for this area. There are several other smaller LSISs which also provide important industrial capacity in the borough.
- 4.20 Industrial floorspace is vitally important as an economic driver in its own right but also to support other economic functions, including servicing both the wider borough and Central London economies. Within LSISs in particular, the principal objective is to retain and intensify B1c light industrial, B2 general industry and B8 storage and distribution uses. The introduction of uses which could compromise the economic function and future economic growth of LSISs (especially residential uses) will not be allowed.
- 4.21 Where new B uses are provided, conditions may be attached to the permission to remove any applicable permitted development rights and/or restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). For example, this may include restricting business floorspace to B1(a) or B1(c) uses only within the wider B1 use class, which ordinarily would not be classed as development. The condition could be worded as follows:
- Operation of Section 55(2)(f) of the Town and Country Planning Act 1990 is precluded with regard to permitted B1(a)/B1(c) use [DELETE AS APPLICABLE]. The premises shall only be used for B1(a)/B1(c) use [DELETE AS APPLICABLE] and for no other purpose (including any other purpose within Class B1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.*
- 4.22 Town Centres and Local Shopping Areas are mixed-use in nature and have several functions, including retail, services and entertainment. Many of these centres also serve as important business locations. The development of new business floorspace will be supported in these locations provided the character and vitality of the area is not undermined and there is no impact on residential amenity. Proposals for new business floorspace in these locations should be accessible to all in accordance with transport policies and should provide an active frontage.
- 4.23 High quality design is expected from all new development. Local occupier demand in Islington indicates a range of types and sizes of new workspace is needed. New development should provide flexible business space to ensure that occupiers can continuously adapt to changing economic and market circumstances. The design of new business floorspace should reflect the functions of the specific economic area. For example, Grade A office space is most appropriate in the CAZ and Bunhill and Clerkenwell AAP area, whereas hybrid space is considered most suitable in the LSISs, particularly the Vale Royal /Brewery Road LSIS; flexible workspace suitable for small businesses is particularly suitable in business locations and Town Centres outside the CAZ. These examples are not an exhaustive list of the types of space required, relative to location, and other best practice guidance and case-specific information may be used to inform the type of space that is sought.
- 4.24 The development of new business floorspace must meet the needs of our increasingly diverse communities and adapt to their different and evolving demands. The council recognises that the public transport system still remains inaccessible to many.

Wheelchair accessible parking and drop-off bays, and inclusive cycle parking, will be required from new business development, in line with Policy T3.

4.25 Other inclusive design features such as step free access, accessible toilets, end of trip facilities and safe egress and evacuation for all should also be incorporated into new business development, in line with the guidance in the Inclusive Design SPD. Proposals that include revolving doors will be resisted. Entrances that feature revolving doors with separate pass doors are not an acceptable solution; such a solution is not inclusive as they result in separate treatment by the creation of secondary entrances

4.26 Flexible design features include:

- adequate floor to ceiling heights (at least 3 metres of free space, but up to 5 metres in industrial buildings to allow for the introduction of mezzanines);
- strategic lay-out of entrances, entry cores, lift cores, loading facilities and fire escapes, to allow mixing of uses within the building; grouping of services including plumbing, electrics, cabling, communications infrastructure and circulation;
- full separation of business and residential floorspace, where forming part of a mixed use residential development, unless adequate security measures can be put in place;
- flexible ground floor access systems that can easily be adapted for goods delivery (e.g. through adaptable façade panels); and
- good standards of insulation to mitigate any overspill from future alternative uses in the building.

4.27 Live/work units, due to the higher property value of residential units, are generally used for residential purposes in Islington and do not generate significant employment. Where proposed, live-work units will be assessed as residential units and will not be considered to contribute to the overall proportion of business floorspace within proposals. For proposals involving the loss of existing live-work units, their loss will be assessed against Policy B3.

### **Policy B3: Existing business floorspace**

A The council will protect existing business floorspace throughout the borough.

B Proposals resulting in the net loss of business floorspace within the CAZ, Bunhill and Clerkenwell AAP area, Priority Employment Locations, Locally Significant Industrial Sites, Town Centres, Local Shopping Areas, and non-designated locations, either through change of use or redevelopment, will be refused unless there are wholly exceptional circumstances which demonstrate:

- i. There is no demand for the use of the floorspace, unit, building and/or site for a business use appropriate to the role and function of the area. Evidence must be submitted demonstrating that such space has been vacant and continuously marketed for a period of at least 24 months, in line with Appendix 1.

- ii. The loss of business floorspace – either individually or cumulatively - would not compromise the operation of the wider area, and that the proposed non-business use is compatible with existing uses.

- 4.28 To meet the identified need of 400,000sqm of business floorspace up to 2036, the Local Plan aims to promote new business floorspace and ensure that existing business floorspace is strongly protected; this dual approach is integral to policy B1, and both strands must operate together to achieve the overarching objective of meeting employment projections. Intensification, renewal and modernisation of existing space is particularly encouraged. To ensure that short term economic uncertainties do not impact the delivery of business floorspace in the medium term, marketing and vacancy evidence will be required for (24 months). Although Islington's economy is strong and is set to grow even further, there may be instances where market demand dips but will likely pick back up in line with medium to long term projections. This approach means that once the market regains strength, business floorspace has not been lost unnecessarily as the marketing period is long enough to allow for market fluctuations.
- 4.29 Islington has lost a significant amount of business floorspace over recent years. Although there were overall gains in the amount of office space permitted and completed through the planning application process during this period, this increase has been all but eradicated by the introduction of the office to residential permitted development right. At the time of writing, approximately 53,000sqm of office space had been given prior approval to convert to residential use as a result of the permitted development right. Given this significant reduction to Islington's stock of office floorspace, and in light of the high projected demand for floorspace to accommodate new jobs, it is essential to ensure further losses to existing business space are minimised.
- 4.30 To ensure the ongoing protection of office floorspace in the CAZ, and in addition to this policy, the council has consulted on a non-immediate Article 4 Direction to remove the office to residential permitted development right in the CAZ, which (if confirmed) will come into effect from May 2019, when the current exemption is lifted.
- 4.31 Industrial uses have seen wholesale losses in recent. There continues to be significant pressure to redevelop Islington's remaining industrial land for other uses, due to its often perceived lower value. However, as noted in policy B2, a good supply of industrial land is integral to ensuring inclusive economic development in Islington and Central London. Islington's Employment Land Study forecasts further losses of industrial land, some 90,000sqm up to 2036. Given the importance of industrial land, the Local Plan will strongly resist the loss of all industrial uses. The London Plan, policy E4 identifies Islington as a borough which should retain and intensify industrial floorspace capacity and follow a general principle of no net loss across designated LSIS.
- 4.32 Priority Employment Locations and Town Centres are important clusters of businesses and enterprises. To ensure there is an adequate supply of business units and premises in these locations, proposals which result in a net loss of business floorspace will be strongly resisted.
- 4.33 Proposals involving the net loss of business floorspace in the CAZ, Bunhill and Clerkenwell AAP area, LSISs, PELs, Town Centres, Local Shopping Areas and non-designated locations, must demonstrate there is no demand for the use of the

floorspace, unit, building and/or site, for a business use appropriate to its role and primary economic function. Where a net loss of business floorspace is proposed, clear and robust marketing and vacancy evidence for a period of 24 months must be provided to clearly demonstrate there is no demand. The evidence should prove that there is no reasonable prospect of the unit, building, and/or site being used for business purposes in the medium term and should include strategic and local assessments of demand and supply and evidence of vacancy and marketing. Appendix 1 sets out the information to be provided in relation to marketing and vacancy evidence. Planning applications will be refused if all the criterion set out in Appendix 1 are not met.

- 4.34 Replacing business uses with non-business uses (particularly residential use) could compromise the operation and viability of the wider area/cluster. Where a proposal for a non-business use satisfies the marketing criteria set out in Appendix 1 it will then be required to demonstrate to the council's satisfaction that the proposal would not compromise the operation and viability of the wider area, and would not negatively impact the primary economic function of the area or the local economy.
- 4.35 Proposals for the redevelopment of existing business floorspace for the provision of non-business uses must demonstrate that the proposed non-business use is compatible with existing uses, and does not have a detrimental individual or cumulative impact on the role and economic function of the wider area. Individual impact may not seem as significant from smaller schemes, as opposed to the impact from larger schemes, however, smaller losses may add to the cumulative impact. Some uses, such as residential use, may not be compatible with the existing businesses use. This may be of particular importance within the LSIS, where industrial uses may have noise and transport related impacts. Relevant Local Plan policies, including the agent-of-change principle set out in policy DH5, will be used to assess impacts.

## **Policy B4: Affordable workspace**

- A. Within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road), Priority Employment Locations and Town Centres, major development proposals for employment floorspace (those involving 1,000sqm or more gross B-use floorspace) must incorporate at least 10% affordable workspace (as a proportion of overall gross B-use floorspace) to be leased to the council at a peppercorn rate for a period of at least 20 years. The council will subsequently lease the space to a council-approved operator.
- B. For proposals involving 10,000sqm or more gross B-Use floorspace, or significant office extensions/intensification proposals in high value areas, 10% affordable workspace (as a proportion of overall gross B-use floorspace) for a peppercorn period longer than 20 years will be sought, including space in perpetuity.
- C. All proposals which provide affordable workspace must prepare an Affordable Workspace Statement to be submitted alongside the relevant planning application.

- D. Affordable workspace should be built to at least Category A fit out, and should provide a high standard of amenity for occupiers with access to relevant servicing and facilities.
- E. Proposals for major commercial development – such as hotels and retail - may be required to provide affordable workspace and/or affordable retail space, subject to viability. Priority will be given to on-site provision.

- 4.36 The nature of London's economic growth and sharp rise in population have combined to place particular stress on land markets. These stresses are particularly evident in Islington given its location within the CAZ, in close proximity to central London. Rapidly rising land values is leading to growing competition for space between the residential and commercial property markets, which leads to increases in business rents and makes the borough a more unaffordable place to do business. This is especially an issue for SMEs who are generally more cost-conscious and sensitive to rising rents. Such firms are unable to benefit from locating near to other similar firms, which damages their prospects and also stymies the development of particular sectors.
- 4.37 The SME sector plays a key role in the borough's economy; therefore, ensuring a sufficient supply of space suitable for these businesses is a key priority. A key objective of the Local Plan employment policies is the encouragement of the SME economy, through nurturing space that is appropriate to its diverse needs, including affordable workspace.
- 4.38 Affordable workspace is B-use workspace which is leased to the council at a peppercorn rate for a period of at least 20 years, and managed by a council approved Workspace Provider. Rental values for end occupiers will ultimately depend on the quality of space and its location, and will be considered on a case-by-case basis through the council's Affordable Workspace Commissioning Process; rents (including service charges) will be at varying rates but significantly below the market. The council's Economic Development Team will lead on the Affordable Workspace Commissioning Process once affordable workspace is secured. More information is provided in the council's Affordable Workspace Strategy.
- 4.39 For the avoidance of doubt, floorspace which does not meet these requirements will not be considered to be affordable workspace for the purposes of policy B4. This includes stand-alone small business units, although such units may be required in addition to affordable workspace, under policy B2. Proposals for business floorspace (including various different typologies such as individual desk spaces and co-working space) at a discounted market rent let directly to an end occupier will not be considered to be affordable workspace (regardless of the level of discount) if the space is not let through the council's Affordable Workspace Commissioning Process (incorporating requirements for letting the head lease at peppercorn rent for at least 20 years, with the space being let and managed by a council approved workspace provider).
- 4.40 Major development proposals for 1,000sqm or more (gross floorspace) of employment floorspace within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas of Angel and Upper Street and King's Cross and Pentonville Road, Priority Employment Locations and Town Centres, must provide at least 10% of affordable workspace, as a proportion of overall gross B-use floorspace. In exceptional circumstances (based on robust justification) where the council accepts a level of affordable workspace that does not comply with the policy requirements, the council will impose a late stage review mechanism which will reassess the construction costs

and commercial values of the scheme at a future date. Any additional value arising over and above the projected position agreed by the council at the planning application stage would then be utilised to extend the peppercorn period as far as possible.

- 4.41 Viability work undertaken by the council suggests that certain sites can lease the space for a longer peppercorn period, including space in perpetuity where viability demonstrates this is possible.
- 4.42 Off-site contributions for affordable workspace may be sought in exceptional circumstances. These will be determined case-by-case but will generally be where the council is not satisfied with the proposed size or quality of the affordable workspace. This will be informed by engagement with the council's Inclusive Economy team and, where relevant, operators on the council's Workspace Providers list. The following formula should be used to calculate off-site contributions<sup>15</sup>:

**Step 1:** calculate projected B1a Office rental values from subject property or comparables (on a per square metre per annum basis).

**Step 2:** Identify 10% of floorspace in square metres (NIA)

**Step 3:** 10% of floorspace (from step 2) x rental value per square metre (from step 1) = rent per annum

**Step 4:** identify B1a Office yields from subject property or comparables (All Risks Yield)

**Step 5:** calculate multiplier as follows:

$$(1+i)^n - 1 / (i (1+i)^n)$$

*n* = number of years at peppercorn rent (20 years)

*i* = All Risks Yield (Yield divided by 100)

**Step 6:** rent per annum x multiplier = level of Affordable Workspace Contribution required

- 4.43 The design of affordable workspace will vary, depending on the end occupier or sector; however, all affordable workspace units must be built to at least Category A Fit Out. Applicants should engage with the council at the earliest possible stage of development – ideally pre-application stage, to ensure that the design is appropriate. Applicants should also demonstrate that affordable workspace incorporates:

- flexible internal arrangements that permit a number of different internal work areas to be accessed from shared spaces;
- good standards of internal sound insulation;
- access to shared spaces and facilities, such as communal breakout space, meeting rooms, kitchen areas, bike storage and goods lifts; and
- external space reserved for loading/unloading.

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<sup>15</sup> This formula may be updated in future through a Supplementary Planning Document.

## Policy B5: Jobs and training opportunities

- A. On-site construction training opportunities for local residents are required from developments of 10 residential units or above; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of 500sqm GEA or greater.
- B. Jobs and training opportunities, including apprenticeships, will be required from developments where there is an uplift of 500sqm GEA of employment floorspace (i.e. any employment generating use).

- 4.44 Islington has a strong economy which makes a significant contribution to London's overall economy. The number of jobs in the borough increased by almost 30,000 between 2005 and 2015, and the latest figures from 2013 indicate that there were 1.36 jobs for every resident. However, significant inequality exists and Islington has consistently shown an unemployment rate higher than the London average, demonstrating an apparent mismatch between the skills held by residents, and those required by employers.
- 4.45 Given the number of jobs in Islington is expected to increase by 50,500 up to the 2036, it is a key priority for the council that local residents are able to access these jobs. This is a cross-cutting objective which requires action from a range of council departments and external agencies. Planning policies are just one way of supporting residents in to work. On-site construction training opportunities will be required from major residential development; hotels, student accommodation or hostels with 20 or more rooms; and non-residential developments with an uplift in floorspace of 500sqm GEA or greater. Other jobs and training opportunities, including apprenticeships, will be required from developments where there is an uplift of 500sqm of employment floorspace (i.e. any employment generating use).
- 4.46 The Planning Obligations (Section 106) SPD provides further detail on the contributions required by policy B5.
- 4.47 Another contributor to the much wider response to worklessness in the borough is the council's iWork service. In conjunction with local partners, iWork supports unemployed Islington residents into work. The team provides a variety of services, from one-to-one employment support and focused support for young adults, to CV development and help accessing childcare bursaries. The iWork service will be promoted to developers at the earliest possible stage in the development process to ensure that local residents can benefit from new development.



## Retail, leisure and services, culture and visitor accommodation

### Policy R1: Retail, leisure and services, culture and visitor accommodation

#### Retail, Leisure and Services

- A. Town Centres are the focal point for commercial, cultural and civic activity in the borough. There are four Town Centres in Islington: Angel; Nags Head; Finsbury Park; and Archway. Each Town Centre has its own character and serves different functions, which should be maintained and enhanced. Each Town Centre is covered by a specific spatial strategy, set out in chapter 2. The Town Centre boundaries are defined on the Policies Map and shown in Figures 4.2 to 4.5 below.
- B. The Council will seek to ensure that all Town Centres develop in a way that supports their continued vitality and viability to meet the needs of local residents, and provide a diverse retail and leisure experience for residents, workers and visitors alike.
- C. Primary Shopping Areas are where retail (particularly A1 uses) are concentrated in Islington's Town Centres. The Primary Shopping Area boundaries in each Town Centre are defined on the Policies Map and shown in figures 4.2 to 4.5 below. Retail uses will generally be protected in Primary Shopping Areas. Outside the Primary Shopping Area, a range of main Town Centre uses are considered suitable, in order to promote and encourage diverse shopping and leisure destinations.
- D. Local Shopping Areas provide more local services, particularly essential convenience retail which caters for daily shopping needs. Some Local Shopping Areas also have a more diverse mix of commercial uses, particularly leisure uses, which can help to sustain the vibrancy of these areas. Local Shopping Areas are defined on the Policies Map.
- E. There are a number of other retail and leisure uses that provide a valuable service to local communities but are not within specifically designated areas. These dispersed uses, particularly within the A1 and A3 use classes, should be protected.
- F. Residential uses have significant potential to cause adverse impacts on the vitality and viability of retail areas. As such, they should be located away from the core retail areas and situated on upper floors. Residential uses should also fully prevent/mitigate risk of future impacts through design and the agent of change principle.
- G. Small shops contribute to the unique character of Islington and support local businesses. The Council will protect existing small shops and promote new small shop provision as part of new developments.
- H. Specialist Shopping Areas, such as the Fonthill Road and Camden Passage, have a unique function and character, and contribute to the vitality and viability of the borough. Retail uses in this area will be strongly protected.

- I. Retail services and leisure uses will be resisted where, by virtue of their location and/or concentration, they would have negative impacts on the character, function and amenity of an area or would negatively impact on the health and wellbeing of the borough's residents.
- J. Within retail areas, streets will be actively managed to balance the demands on the public realm from businesses, particularly restaurants and cafés, and the need for easy pedestrian movement. Active frontages will be promoted.

### **Culture and the Night Time Economy**

- K. Cultural uses are an essential part of Islington's social and economic fabric and their loss or diminution will be strongly resisted.
- L. Islington has a varied night time economy which the council will seek to protect and enhance where appropriate. Concentrations of night time economy uses exist in the borough including in designated Cultural Quarters. The Council will work with partners to support and manage a thriving and safe night time economy.
- M. Angel Town Centre, Archway Town Centre and part of the Clerkenwell and Farringdon area are designated Cultural Quarters. All development proposals within Cultural Quarters must enhance the Cultural Quarter by providing new/improved cultural uses and/or uses which support the cultural function within the quarter and the character of the area.
- N. Pubs are part of Islington's social fabric and they contribute positively to Islington's culture, character and economy. The loss of pubs will be resisted and new pubs will be supported where appropriate.

### **Visitor Accommodation**

- O. To ensure that land is safeguarded for uses which are greater strategic priorities in Islington, development, redevelopment and/or intensification of visitor accommodation will only be supported in specific locations.
- P. Visitor accommodation must be well-designed, accessible and sustainable.

## **Retail, leisure and services**

- 4.48 Islington, on the whole, has a robust and thriving retailing, leisure and service offer which serves the needs of residents and workers and is part of what attracts visitors to the borough. However, there are significant structural challenges facing the retail sector, from internet shopping to changing retailer and customer requirements and demands. Retail centres in Islington therefore need to adapt and futureproof for these changing circumstances while maintaining a level of retail needed to cater for local communities and workers; the future for Town Centres is as a 'place to be' rather than solely a 'place to buy'. They are also places which encourage social interaction and play an important part in cohesive communities.
- 4.49 Major Town Centres at Angel and Nag's Head are at the top of the borough's retail hierarchy, followed by District Town Centres at Archway and Finsbury Park. Town Centres should be the key focus for new retail and leisure development.

- 4.50 Local Shopping Areas sit below Town Centres on the retail hierarchy. These areas feature smaller scale, local retail uses. Dispersed retail uses are at the bottom of the hierarchy.
- 4.51 Each of Islington's four Town Centres has its own distinct character. Development must respect and enhance this, whilst meeting any requirements for new retail. Development proposals which cause harm to the character, amenity, function, and/or vitality and viability of a Town Centre will be resisted.
- 4.52 Each of Islington's Town Centres include a Primary Shopping Area designation. The Primary Shopping Area is located in the core of the Town Centre and is the focal area for A1 uses. Units within the Town Centre outside of the Primary Shopping Area conversely have greater flexibility to change to other suitable Town Centre uses which will help increase the diversity and vibrancy of uses.
- 4.53 Local Shopping Areas and dispersed retail and leisure uses are an important part of Islington's retail offer. They complement the more significant retail offer in designated Town Centres and play an important role in serving the needs of residents across the borough. They provide a convenient, valuable service to their surrounding communities by meeting the day-to-day shopping needs of residents, workers and visitors as well as providing other services including some leisure uses. Local Shopping Areas also play an important social role for the surrounding community, providing a commercial focal point and meeting point where people can interact and socialise. These areas contribute to the character and identity of an area.
- 4.54 Excessive concentration of premises controlled by licensing and gambling legislation can have a negative impact on the vitality, viability and diversity of Town Centres. Development proposals will be resisted where they result in an unacceptable concentration of night-time economy uses, hot food takeaways, betting shops and other gambling facilities, financial and professional services such as payday loan shops or estate agents, or other similar uses. It is important to ensure a mix and balance of complementary day and night-time uses that creates an attractive and vibrant area that co-exists successfully with neighbouring residential areas and does not significantly compromise well-being. Certain types of uses can cause detrimental cumulative impacts as a result of their concentration or location. The council will therefore resist applications for such uses where they would cause harm.
- 4.55 Residential uses in Town Centres and Local Shopping Areas can be detrimental to the function of a retail centre, especially if they occupy units on the ground floor or below. Breakages in retail frontages, especially in the centre of frontages can have adverse impacts on the vitality, viability and character of shopping areas. Occupation of upper floors by residential uses are more appropriate although these should not harm the functioning of retail and leisure centres in the borough.
- 4.56 Retail to residential prior approval applications, currently permitted under Part 3, Class M of the General Permitted Development Order ("the GPDO") will be assessed against relevant Local Plan policies related to prior approval categories; such policies are material to the prior approval determination. The most relevant prior approval category related to land use is condition M.2(1)(D), which requires an assessment of whether it is undesirable for the building to change to residential use because of the impact of the change of use:
- (i) on adequate provision of Use Class A1/A2, but only where there is a reasonable prospect of the building being used to provide such services; or

- (ii) where the building is located in a key shopping area, on the sustainability of that shopping area.
- 4.57 Applicable policies will be dependent on the location of the building subject to the application, for example policies R2 and R3 will apply to applications in the Primary Shopping Area of Town Centres, while policy R4 will apply to applications in Local Shopping Areas. In the absence of a definition of the term 'key shopping area' set out in the GPDO, a key shopping area (for the purposes of any prior approval assessment) will be considered to be any Town Centre or Local Shopping Area designated in the Local Plan.
- 4.58 Dispersed shops are not key shopping areas, hence they will be assessed under the first criterion of condition M.2(1)(D). Given the densely populated nature of the borough, which creates significant demand for retail uses, it is considered that dispersed shop buildings will always have a reasonable prospect of being used to provide retail services.

## Culture and the Night Time Economy

- 4.59 The council seeks to protect and enhance the variety of cultural attractions in Islington which contribute to the economy as well as enhancing the lives of residents and visitors. There is no set list of 'cultural' uses. The council will encourage existing businesses and premises to diversify and introduce a new or enhanced inclusive cultural offer. Typical cultural attractions include pubs, theatres, working men's clubs, bingo halls, music venues, galleries, museums, bars, nightclubs, restaurants, conference centres, and community festivals. Islington has a wealth of cultural attractions which belies its size as the second smallest borough in London; this includes several museum and archive sites, various music venues and cinemas, a strong community arts sector and a number of dance and theatre venues (providing London's largest theatre offer outside the West End), notably the renowned Sadler's Wells, King's Head and Almeida theatres in Angel and the Park Theatre in Finsbury Park.
- 4.60 Islington's Arts Strategy sets out the borough's vision and approach to enhancing artistic and cultural potential to enrich people's lives and further the development of a modern dynamic economy.
- 4.61 Islington has a 24-hour economy, with uses operating at night playing an integral role. The night time economy refers to all economic activity taking place between the hours of 6pm and 6am<sup>16</sup>. Activities associated with the night time economy are varied and include eating, drinking, entertainment, shopping but also include cleaning, hospitality, logistics and distribution, transport and medical services which employ a large number of night time workers. These varied activities all require good quality infrastructure to make the movement of people efficient, safe and attractive.
- 4.62 The council will generally support the diversification of daytime uses to extend their opening hours and offer alternative daytime and night time activities in appropriate locations, depending on existing concentrations and amenity impacts.
- 4.63 Cultural and night time economy activities, should be located in the CAZ or Town Centres and will be especially encouraged in Cultural Quarters. This allows for a

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<sup>16</sup> The 'night time economy' includes the 'evening economy' which describes economic and leisure activity between the hours of 6pm - 12pm.

critical mass of these uses to support a vibrant and viable clustering, in areas which are commercially-focused and therefore less likely to lead to adverse amenity impacts, especially for residential uses. There are also benefits in the form of containing adverse impacts such as noise and being able to direct resources for the management of the night time economy activities. However, encouraging a critical mass does not detract from the importance of balancing needs so that a variety of existing and new uses can thrive.

- 4.64 Islington is a small but diverse borough with four designated Town Centres (Angel, Nags Head, Archway and Finsbury Park) as well as the Bunhill and Clerkenwell wards which together make up the majority of Islington's part of the CAZ. The council recognise that culture is varied and perceived differently across the borough with different centres having a varied level of appeal. Where relevant, spatial strategy policies and the Bunhill and Clerkenwell AAP provide further detail on the cultural offer of specific centres/areas.
- 4.65 The amenity of local residents and businesses in the vicinity of licensed premises will be considered and protected. Islington Council's licensing policy mitigates impacts such as noise, odour and litter. The council's Licensing Team and licensing policy is separate to the Planning Department and planning policies. However, the council's licensing team should be consulted on any planning application which proposes a licensable activity. In most cases, except in exceptional circumstances, the council's licensing policy expects applicants to have planning consent before making an application for a premises license.

### Visitor Accommodation

- 4.66 Islington has a strong record of delivering visitor accommodation. Well-designed visitor accommodation in appropriate locations can play an important supporting role in the Islington and London economy, facilitating tourism and supporting the operations of other businesses while also having some direct (relatively low density) employment benefits.
- 4.67 However, business floorspace (particularly Use Class B1a floor space) is the main driver of economic growth in the borough, and is considered the best means to meet Islington's significant jobs projections with a projected additional floor space need for office use of 400,000sqm by 2036. Considering the role of visitor accommodation as a supporting use, alongside the significant past delivery, the council considers that locations for visitor accommodation (both new-build accommodation and/or redevelopment/intensification of existing visitor accommodation) should be restricted to ensure that visitor accommodation does not limit the achievement of other priorities, particularly economic and housing growth.

### Policy R2: Primary Shopping Areas

- A. Within Primary Shopping Areas, the percentage of A1 uses should be maintained at a minimum of 60% in Angel and Nag's Head Major Town Centres; 55% in Finsbury Park District Town Centre; and 50% in Archway District Town Centre.

- B. Proposals which result in the percentage of A1 uses in the Primary Shopping Area falling below the percentages in Part A must:
- (iii) Demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued A1 use, or other appropriate main Town Centre uses;
  - (iv) Prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and predominantly A1 retail function of the Primary Shopping Area;
  - (v) Provide an active frontage at ground floor level, particularly where fronting main transport/pedestrian route(s); and
  - (vi) Ensure there is no harmful break in the continuity of retail units.

- 4.68 To ensure vitality and viability is maintained, the Primary Shopping Areas of Islington's Town Centres will be protected and enhanced. Primary Shopping Areas contain the greatest concentration of shops (A1 retail use); are the most accessible part of the Town Centre; and are key to protecting the character and function of Town Centres and ensuring their continued vibrancy, vitality and viability. Where proposals within Town Centres fall outside the Primary Shopping Area, Policy R3 will apply.
- 4.69 To ensure a critical mass of retailing uses is maintained within Primary Shopping Areas, the A1 retail function should remain the principal use; this will be achieved by imposing a specific percentage requirement for A1 uses within Primary Shopping Areas. Proposals which would result in the overall percentage falling below this minimum level must provide marketing and vacancy evidence and meet other criteria to demonstrate that potential adverse impacts are prevented. Appendix 1 sets out the information to be provided in relation to marketing of vacant floor space.
- 4.70 To determine the existing Primary Shopping Areas A1 percentage figure, the number of Use Class A1 units within the Primary Shopping Area should be divided by the total number of units within the Primary Shopping Area. Other methods to calculate the percentage, for example considering only specific frontages, will not be acceptable for the purposes of meeting policy R2.
- 4.71 To ensure the Primary Shopping Areas sustain their vitality and function as the retail hubs of Town Centres, it is important to avoid harmful breaks in retail frontages. What constitutes as a 'harmful break' will be assessed on a case by case basis taking into account site specific circumstances, but generally refers to the introduction of a use that does not complement the Primary Shopping Area and detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-commercial uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.

## **Policy R3: Islington's Town Centres**

- A. The Council will seek to maintain and enhance the retail, service and leisure function of Islington's four Town Centres, which are designated on the Policies Map and shown on Figures 4.2 to 4.5.
- B. Proposals for A1-A5, D2 and/or Sui Generis main Town Centre use floor space should be located within a designated Town Centre. Proposals for these uses outside a designated Town Centre will only be permitted where they meet relevant criteria under Part C, D or E.
- C. Proposals for A1-A5, D2 and/or Sui Generis main Town Centre use floor space in the Central Activities Zone may be acceptable where:
  - (i) The scale of the development would not have an adverse individual or cumulative impact on the character, function, vitality and viability of Islington's Town Centres or Local Shopping Areas. An impact assessment may be required to fully assess potential impact;
  - (ii) The proposal can be accommodated without adverse impact on the amenity of residents and businesses; and
  - (iii) The proposal does not involve the loss of existing business floor space; complements the overarching business floor space focus within the CAZ; and does not detract from the policy requirement to maximise the amount of business floor space as part of new development.
- D. Proposals for up to 200sqm of A1-A5, D2 and/or Sui Generis main Town Centre use in Local Shopping Areas are not required to meet the sequential test. Proposals in excess of 200sqm must meet the sequential test and actively investigate and consider preferable locations in line with the council's retail hierarchy. An impact assessment may also be required for proposals in excess of 200sqm, to assess the impact of larger proposals on the existing character and function of the Local Shopping Area and relevant Town Centres.
- E. Any proposal for A1-A5, D2 and/or Sui Generis main Town Centre use floor space in an edge-of-centre location outside Local Shopping Areas or in an out-of-centre location must:
  - (i) meet the sequential test and actively investigate and consider sequentially preferable locations in line with the council's retail hierarchy, and provide robust justification for not locating in sequentially preferable locations; and
  - (ii) Provide a detailed impact assessment which determines whether there would be likely significant adverse impacts on relevant Town Centres and/or Local Shopping Areas.
- F. Any development proposed within a designated Town Centre is required to:
  - (i) Be of an appropriate scale related to the size and role of the centre;
  - (ii) Ensure there are no adverse impacts on vibrancy, vitality and viability of the centre, including as a result of concentrations of non-A1 uses.
  - (iii) Provide a frontage which engages positively with local character and the street scene, and where identified that historic shopfronts and features are present, these should be retained. Further information on heritage considerations are stated in Policy DH2.

- (iv) Provide a high quality design including meeting policies related to accessibility and sustainability; and
  - (v) Provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated.
- G. Residential uses are not suitable in Town Centres at Ground Floor level or below. Any applications for residential uses in such locations will be strongly resisted. Applications involving the change of use from existing A1-A5, D2 and/or Sui Generis main Town Centre uses (on any floors) to residential use must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use or any other main Town Centre use which could reasonably be assumed to occupy the premises;
  - (ii) Follows the 'agent-of-change' principle consistent with Part C of policy DH5.
  - (iii) Not involve the loss of ancillary floor space (e.g. storage, back-office functions) which could compromise the future operation of the retail unit and make the unit less desirable for future occupiers; and
  - (iv) Provide high quality dwellings with a high standard of residential amenity, consistent with other relevant policies, including those relating to housing standards, design, accessibility and sustainability.
- H. Any applications for new residential uses in Town Centre locations not involving change of use of existing A1-A5, D2 and/or Sui Generis main Town Centre uses must be located on upper floors. Proposals must address criteria set out in Part G(ii) to (iv).

4.72 Figures 4.2 to 4.5 below show the four designated Town Centres and the Primary Shopping Area of each centre:



Figure 4.2: Angel Town Centre boundary (including Primary Shopping Area)

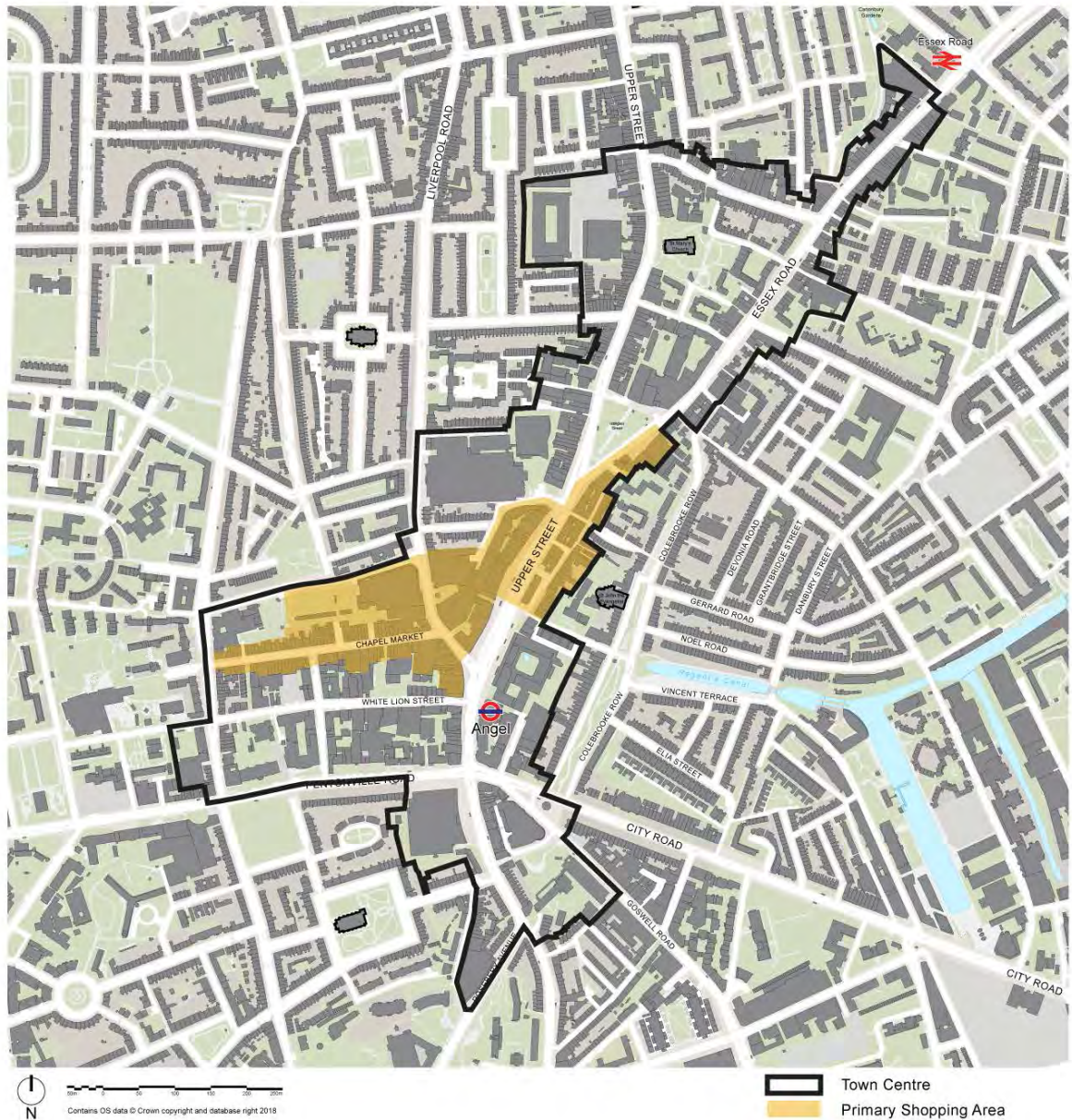


Figure 4.3: Nag's Head Town Centre boundary (including Primary Shopping Area)



Figure 4.4: Archway Town Centre boundary (including Primary Shopping Area)

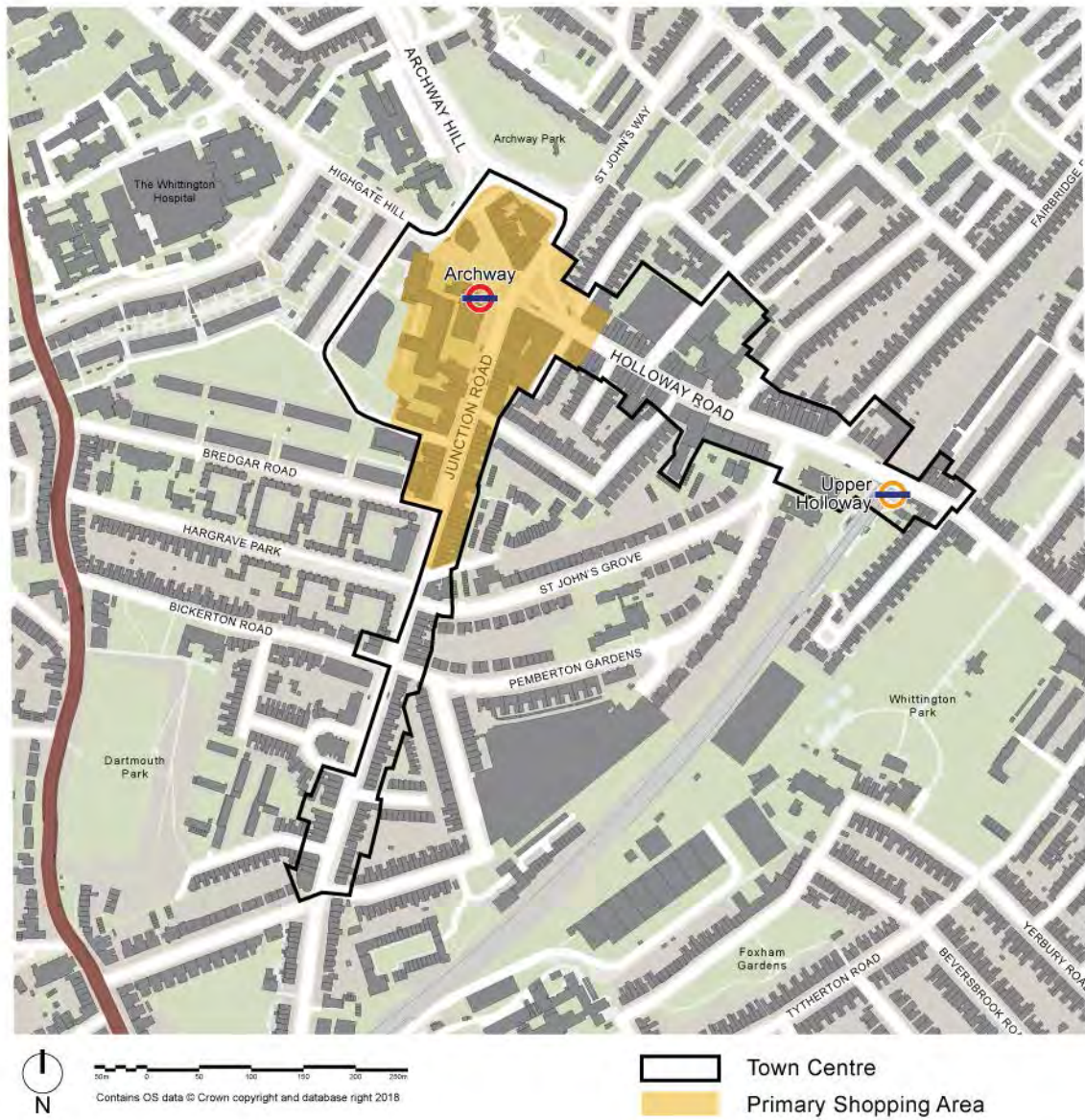
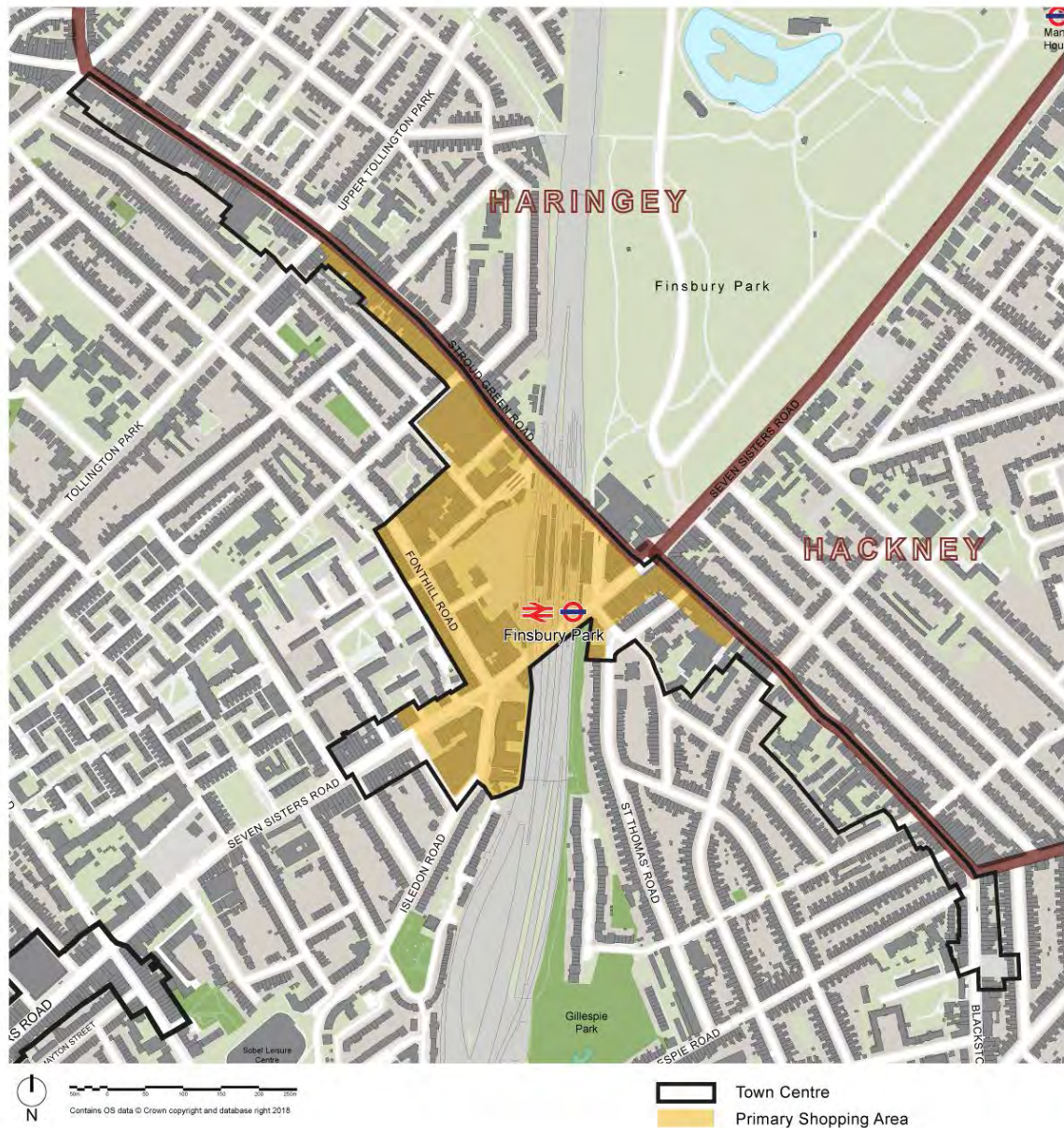


Figure 4.5: Finsbury Park Town Centre boundary (including Primary Shopping Area)



- 4.73 Islington's Town Centres are the primary focus for retailing in the borough. The core of A1 retailing in Town Centres is focused in Primary Shopping Areas (see policy R2), with locations outside of this suitable for a range of A1-A5, D2 and/or Sui Generis main Town Centre uses<sup>17</sup>.
- 4.74 Ensuring that retail and other important services and facilities (such as solicitors, post offices, groceries and newsagents) remain readily accessible is essential to the vitality and viability of Town Centres. Focusing these shops and services within Town Centres will contribute to the inclusivity and sustainability of local communities and the local economy, and reduce the number and length of trips undertaken.
- 4.75 To promote their economic and cultural function, in line with the National Planning Policy Framework, the council will apply a sequential approach to assessing applications for retail, services, entertainment, assembly and leisure uses outside of the Town Centres<sup>18</sup>. For the purposes of this policy, the local impact assessment threshold is 0sqm, meaning that any proposal in an edge-of-centre or out-of-centre location may be required to submit an impact assessment. The level of detail provided in the impact assessment should be proportionate to the scale of the proposed development.
- 4.76 Offices in the B1 use class are also considered a Town Centre use however such applications will be considered in relation to relevant Employment Policies and their impact on the predominant retail and leisure function of Town Centres.
- 4.77 London's Central Activities Zone (CAZ) has a unique role in the retail hierarchy. The CAZ function is primarily linked to business floor space, but retail uses are important supporting uses. The CAZ contains clusters of retail premises, notably at Angel (partly covered by the CAZ), which is a designated Town Centre. There are four Local Shopping Areas within the CAZ, covered by policy R4 and the Bunhill and Clerkenwell AAP. Given the nature of the CAZ, retail uses are also dispersed in numerous other locations. Proposals for new A1-A5, D2 and/or Sui Generis main Town Centre use floor space within the CAZ may be appropriate where it would not undermine the overarching business function of the CAZ, and would not detrimentally affect the vitality and viability of Town Centres and/or local amenity. An impact assessment may be required where the proposed scale of retail could have adverse impacts on nearby Town Centres, Local Shopping Areas or other undesignated clusters of retail, service and leisure uses.
- 4.78 Residential uses on ground floors or below are not appropriate in Town Centres, primarily due to the harmful break in shopfront continuity which affects the viability, vitality and vibrancy of the centre, and therefore is detrimental to the retail and commercial function of Town Centres. Ground floor and basement levels can often also provide ancillary space for storage or backroom functions and therefore should be preserved for the effective operation of retail and commercial units. Residential development on the ground floor or below also raises issues of amenity for the future residential occupiers, as Town Centre uses create heavy footfall and can create disturbance. The quality of shop conversions to residential is generally low quality and therefore would not provide high quality housing as required by policy H4.

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<sup>17</sup> B1 uses are also suitable Town Centre uses however proposals for B1 uses in Town Centres will be assessed against policy B2.

<sup>18</sup> The sequential approach does not apply to D1 uses, for example, health clinics, museums and day centres. Applications for new D1 uses will be assessed against policy SC1.

- 4.79 For proposals to change the use of existing ground floor units (or below), continuous marketing evidence will be required demonstrating lack of demand for main Town Centre uses. Appendix 1 sets out the information to be provided in relation to marketing of vacant floor space.

## Policy R4: Local Shopping Areas

- A. All proposals should maintain and enhance the retail and service function of the Local Shopping Areas (shown in Figure 4.6).
- B. Proposals involving the change of use from A1 to non-A1 commercial use must demonstrate that:
- (i) the premises have been vacant for a continuous period of at least six months and continuous marketing evidence to cover this period has been provided which demonstrates that there is no reasonable prospect of the unit being used in its current A1 use; and
  - (ii) there would not be a significant adverse effect on amenity, particularly the surrounding residential amenity.
  - (iii) The proposal does not cause any individual or cumulative adverse impact on the vitality, viability, character, vibrancy and function of the area;
- C. Residential uses in Local Shopping Areas at Ground Floor level or below will be strongly resisted. Applications for the change of use of A1-A5, D2 and/or Sui Generis main Town Centre use floor space must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least two years and continuous marketing evidence to cover this period has been provided, which demonstrates that there is no reasonable prospect of the unit being used in its current use and any other use which could reasonably be assumed to occupy the premises;
  - (ii) Prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and function of the area;
  - (iii) Comply with the 'agent-of-change' principle consistent with Policy DH5;
  - (iv) Not create a harmful break in the frontage of the Local Shopping Area;
  - (v) Not involve the loss of ancillary floorspace (e.g. storage, back-office functions) which could compromise the loss of ancillary space that is integral to the future operation of the retail unit and make the unit less desirable for future occupiers in the future; and
  - (vi) Provide high quality dwellings with a high standard of residential amenity, consistent with other policies relating to housing standards, design, accessibility and sustainability.
- D. Any applications for new residential uses in a Local Shopping Area not involving change of use of existing A1-A5, D2 and/or Sui Generis main Town Centre uses must

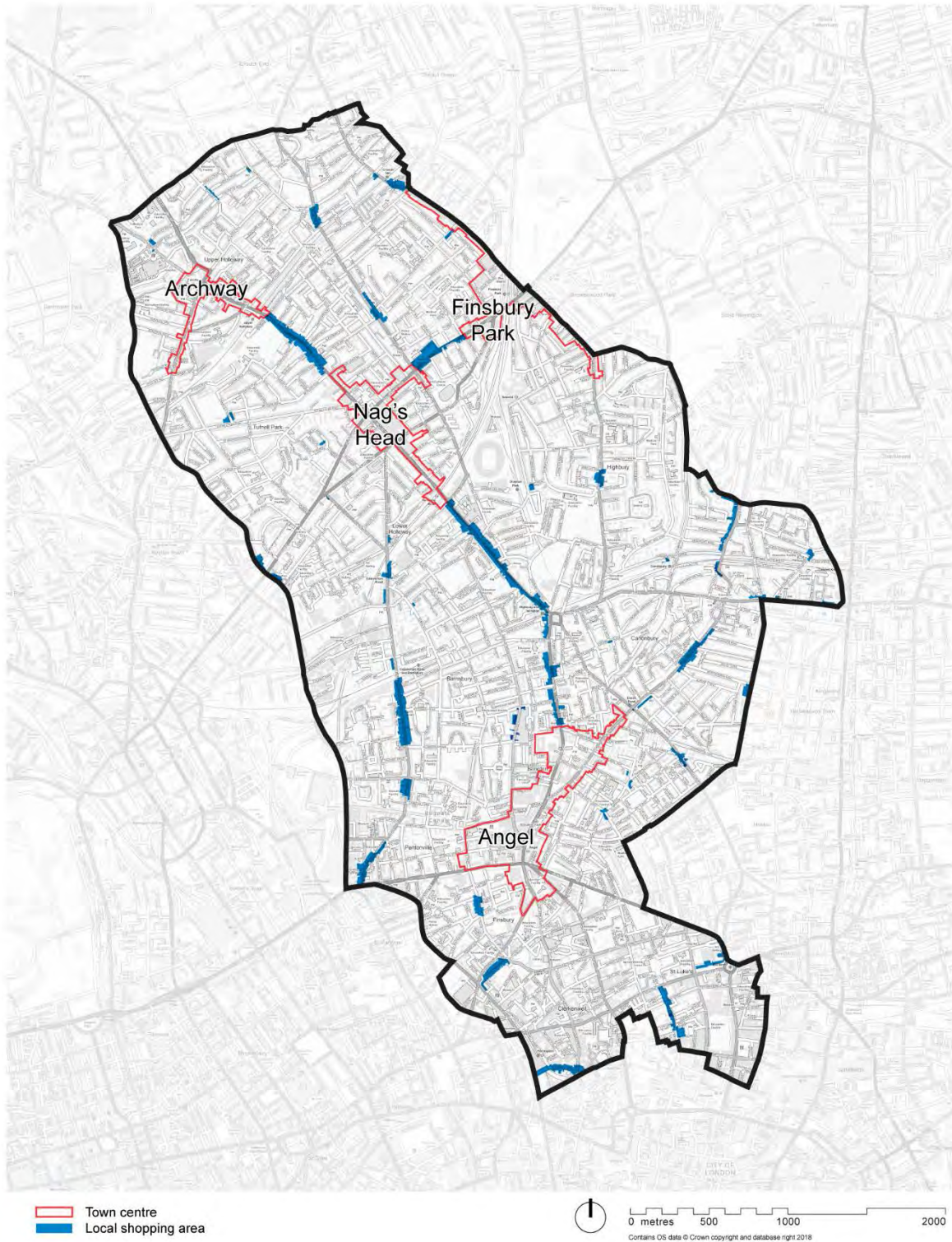
be located on upper floors. Proposals must address criteria set out in Part C (ii), (iii), (v) and (vi) of Policy R5.

4.80 Local Shopping Areas (LSAs) are an important part of Islington's retail offer. These areas vary in size and the role they provide. There are 40 LSAs in Islington, as follows:

1. Hillrise
2. Whitehall Park
3. Highgate Hill
4. Crouch Hill
5. Hornsey Road North
6. Hornsey Road (Tollington)
7. Tollington Park
8. Seven Sisters Road
9. Upper Holloway
10. Campdale
11. Cardwell Terrace
12. Hillmarton Terrace
13. Brecknock Road
14. Highbury Barn
15. Drayton Park
16. Grosvenor Avenue
17. Newington Green
18. King Henry's Walk
19. Ball's Pond Road
20. St Paul's
21. Lower Holloway
22. Roman Way
23. Caledonian Road (Cottage Road)
24. Caledonian Road (Central)
25. Caledonian Road (Copenhagen Street)
26. Liverpool Road/Barnsbury Street
27. Upper Street
28. Canonbury Place
29. Embassy
30. Essex Road
31. Southgate Road
32. New North Road
33. St Peters Street
34. Kings Cross
35. Amwell Street
36. Packington Estate
37. Exmouth Market
38. Whitecross Street
39. Old Street
40. Farringdon

4.81 Figure 4.6 shows the location of LSAs within Islington.

Figure 4.6: Local Shopping Areas (NB: Town Centre boundaries shown for context)





- 4.82 The impact of proposals will therefore affect Local Shopping Areas differently, with the loss of A1 uses in smaller Local Shopping Areas being felt more acutely. The impact on the amenity of local users of a Local Shopping Area will depend on its size, the current mix of uses, and its proximity to other centres (whether that be Local Shopping Areas or Town Centres).
- 4.83 Local Shopping Areas are not immune from wider changes to the retail environment, and therefore need to be resilient to any future changes, such as increases in online shopping. For Local Shopping Areas to be resilient they need to be able to change use class more flexibly in response to changing demands and trends in local shopping. The six-month period of vacancy and marketing evidence for a change of use from A1 to non-A1 commercial uses reflects this increased flexibility
- 4.84 Non-A1 commercial uses refer to those uses that provide an active frontage and enhance the function of Town Centres through employment or the provision of leisure and retail services. Non-A1 commercial uses may include A2-A5, B1a, B1c, D2 and some Sui Generis uses. However, non-A1 commercial uses can vary in their impact, therefore proposals of this nature (including what constitutes a suitable non-A1 commercial use) will be assessed on a case by case basis.
- 4.85 In order to protect the function of Local Shopping Areas, proposals to change the use of ground floor units (including space below ground floor) from A1-A5, D2 and/or Sui Generis main Town Centre use floor space to residential use will be required to demonstrate marketing and vacancy evidence for a period of two years, to demonstrate that there is no continued demand for the existing use and any other use which could reasonably be assumed to occupy the premises.
- 4.86 Proposals of this nature must also not cause a harmful break in the continuity of retail frontages. What constitutes as a 'harmful break' will be assessed on a case by case basis taking into account site specific circumstances, but generally refers to the introduction of a use that does not complement the Local Shopping Area and detracts from the continuity of a publicly accessible, active and engaging frontage. This includes conversion to non-commercial uses in the centre of a frontage, corner units or larger units. Heritage considerations, shopfront design and the relationship to neighbouring units will also be considered.

## Policy R5: Dispersed retail and leisure uses

- A. The council will support and protect A1 uses located outside designated Town Centres and Local Shopping Areas. Proposals involving the loss of dispersed shops must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least one year. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use; and
  - (ii) Provide evidence that there will be accessible provision of essential daily goods (typically convenience retail) within a short walking distance (within 300m).
- B. The council will support and protect dispersed A3 uses located outside designated Town Centres and Local Shopping Areas. Proposals involving the loss of dispersed A3 units must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least six months. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used in its current use; and
  - (ii) Demonstrate that the loss of the A3 unit will not have an adverse impact on the local community, including through the loss of social value.
- C. Proposals for the change of use of dispersed A1 or A3 units to residential use will only be considered acceptable where Part A and B of this policy are satisfied, where high quality dwellings with a high standard of residential amenity will be provided consistent with other policies and standards relating to housing and design, and where the Change of Use would not detrimentally affect the street scene and/or the wider character of an area.

- 4.87 Local shops located outside designated Town Centres and Local Shopping Areas can provide a valuable service to the local community by providing for essential day-to-day needs. Their accessibility is particularly important for those with mobility difficulties.
- 4.88 There has been a loss of a number of local shops, particularly to residential use, in recent years. Continuous marketing evidence will be required for proposals for the Change of Use of existing retail units, demonstrating lack of demand for retail or an appropriate commercial use that provides an essential service to residents. Appendix 1 sets out the information to be provided in relation to marketing of vacant floor space.
- 4.89 Protection of A1 units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.

- 4.90 Dispersed A3 units can contribute positively towards the vibrancy and character of places outside of Town Centres and Local Shopping Areas, especially in residential areas. These units often provide an inclusive meeting place within a community, contributing to community cohesion and can significantly increase the wellbeing and social interaction of those with mobility issues such as the elderly. Facilitating social contact through A3 premises benefits mental health and promotes civic activity by providing spaces that can be used as informal community hubs. The council will seek to protect such uses and any change of use must provide evidence that loss of the A3 unit will not have an adverse impact on the local community. Appendix 1 sets out the information to be provided in relation to marketing of vacant floor space.
- 4.91 Proposals for the Change of Use of dispersed A1/A3 to residential use must demonstrate and ensure a high standard of design and residential amenity for occupants (consistent with policy H4), and should not lead to unacceptable adverse impacts on the street scene and the character of an area.

### **Policy R6: Maintaining and enhancing Islington's unique retail character**

- A. The council views the retention of small shops as a baseline and places great weight on the need to retain any shops which currently or potentially could be utilised by small retailers. In order to encourage new provision of small shop units, the council will seek to secure small shop units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:
- (i) Requiring proposals for new retail development to incorporate small shop premises, proportionate to the scale of the proposal;
  - (ii) Requiring proposals for the redevelopment of small shop units to incorporate adequate re-provision of small units to compensate for any loss, particularly for essential services;
  - (iii) Requiring proposals for major housing developments to incorporate small shop units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m); and
  - (iv) Where appropriate, attaching conditions to permissions for small shop units, requiring planning permission to be sought for the future amalgamation of units into larger premises; specifying a certain level of convenience goods in order to protect and promote essential services; and/or making planning consent personal to a specific individual/organisation.
- B. In order to maintain Islington's retail character, particularly the prevalence of small shop units, the council will resist the amalgamation of individual shop units incorporating A Use Classes. Amalgamation of retail units may be suitable where development proposals demonstrate that the intensification of use would not:
- (i) detrimentally affect the street scene and/or character of the local area; and/or

- |  |
|--|
| (ii) cause unacceptable adverse impacts on the local environment and/or amenity, including impacts from altered/intensified delivery and servicing arrangements. |
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- 4.92 Islington's many small shops help lend the borough its special character and contribute to the identity of its neighbourhoods. Small shops provide an important role in servicing the day-to-day needs of local residents, workers and visitors, and can provide greater consumer choice and local employment. Certain types of small and independent shops perform an essential service and should be easily accessible to all residents. These essential services include butchers, bakers, greengrocers, grocers, fishmongers, chemists, post offices, newsagents, cobblers, hardware stores, dry cleaners and laundrettes. The loss of shop units suitable for such shops, particularly units which contribute to local character, individuality, convenience and the wider commercial success of an area, will be resisted. Applicants for significant retail developments will be encouraged to seek out independent retailers for small units wherever possible
- 4.93 For the purposes of policy R6, a small shop is generally considered to be a unit of around 80sqm GIA or less, usually within the A1 use class. Retention of units suitable for occupation by small retailers should be the starting point when drafting development proposals. Any proposals which have not explored the possibility of retaining these units will be resisted.
- 4.94 Proposals for new retail development in the borough should incorporate small shop premises suitable for occupation by small retailers. Proposals for major residential developments will also be required to provide small shops where no suitable retail provision is accessible within a short walking distance (300m or less). Proposals involving the loss of existing small shops should re-provide small shop units. Where new small shop units are provided, the council will control their occupation, and guard against future loss through use of relevant planning conditions.
- 4.95 The amalgamation of individual shop units can result in material impacts, primarily relating to physical changes and intensification of use. Amalgamation of shop units will be resisted where they materially and detrimentally affect the character of Islington's shopping areas, including the impact of amended shopfronts. Amalgamated shop units may also result in different patterns of delivery and servicing; small supermarkets, for example, depend on very fast sales rates, which (where adequate storage is not available) requires 'just in time' deliveries. This can result in more traffic movements by delivery vehicles, which in turn can impact on residential amenity and environmental quality, and cause adverse impacts on the local highway. Where unacceptable adverse impacts arise, the amalgamation of individual shop units will be resisted. Policy T5 will be used to assess proposed delivery and servicing arrangements.

## Policy R7: Markets and specialist shopping areas

- A. The council will seek to maintain, and support the enhancement of, existing markets within the borough.
- B. New markets are encouraged in Town Centres and appropriate locations in the Central Activities Zone, where they support the existing function of a specific locality, enhance the areas unique selling point and do not adversely impact any predominant 'bricks-and-mortar' based uses.
- C. The council will continue to protect and promote the role of Specialist Shopping Areas at Camden Passage and Fonthill Road. Proposals which result in the percentage of A1 uses in the Specialist Shopping Areas falling below 75% must:
  - (i) Demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued A1 use or other retail or leisure uses which would complement the specialist shopping function;
  - (ii) Ensure that the proposal would not result in a break in continuity of retail frontage of more than one non-A1 unit in any linear stretch of three units.
  - (iii) Prevent/mitigate any individual or cumulative impact on the vitality, viability, character, vibrancy and predominantly A1 retail function of the Specialist Shopping Area; and
  - (iv) Provide an active frontage at ground floor level fronting main transport/pedestrian route(s).
- D. Regardless of the resulting percentage of A1 uses, proposals that result in the partial loss of A1 floor space (including ancillary floor space) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the A1 unit and/or collectively undermine the function of the Specialist Shopping Area.

4.96 There are three well established street markets in Islington, at Chapel Market, Exmouth Market and Whitecross Street, as well as the covered market at Nag's Head and other regular markets in certain locations including Camden Passage and Archway. Markets are very popular with shoppers and visitors because of their vibrancy and the range and variety of goods on offer. Markets also add to the character of local areas, create employment opportunities, support regeneration and promote social interaction. They can also act as a testing ground for new small businesses.

4.97 The council wishes to see markets continue and thrive, and will encourage a coordinated approach to development and management of markets in matters such as deployment of signage, pavement furniture and other market infrastructure. New markets should make a positive contribution to character and support the existing function of the proposed location whilst complementing existing shops and services. If markets are poorly designed and managed they can cause harm to surrounding areas in terms of congestion of local roads and pavements, rubbish and refuse, storage and noise.

- 4.98 Specialist Shopping Areas provide a significant benefit to their local areas, with the ability to draw shoppers from outside the borough due to the more bespoke nature of the goods on offer, as well as adding significant value to the character and vitality of their respective areas. Specialist Shopping Areas in Islington –the antique/curio shops at Camden Passage in Angel and the clothing shops at Fonthill Road in Finsbury Park – have a high level of units in A1 use and provide a major contribution toward a healthy retail offer in these centres. The retention of at least 75% A1 use in these areas will maintain the specialist character and function of these areas.
- 4.99 Fonthill Road has a rich history of fashion manufacturing and wholesale commerce. The upper floors of buildings on Fonthill Road were used as workshops and are now generally used either for storage or have been converted to other uses. The council will seek to retain these upper floor ancillary spaces (e.g. storage space, back office) in all Specialist Shopping Areas to support the effective operation of the retail units or for stand-alone uses - including SME units for creative enterprises - which complement the area and do not adversely impact the ongoing operation of the area. Proposals that result in the partial loss of A1 floor space (including ancillary floor space) in Specialist Shopping Areas must demonstrate that the loss will not undermine the effective operation of the A1 unit and/or collectively undermine the function of the Specialist Shopping Area.
- 4.100 To determine the percentage of A1 uses in Specialist Shopping Areas, the total number of A1 units within the Specialist Shopping Area should be divided by the total number of units within the Specialist Shopping Area. The Fonthill Road Specialist Shopping Area incorporates some units on Wells Terrace as well as those on Fonthill Road. The Camden Passage Specialist Shopping Area includes units on Camden Passage and Pierrepont Row.

## **Policy R8: Location and Concentration of Uses**

- A. Proposals will be resisted where they result in an unacceptable concentration of night-time economy uses, hot food takeaways, betting shops and other gambling facilities, financial and professional services such as payday loan shops or estate agents or other similar uses. Concentration of uses will be assessed based on the number of units within a 500m radius of the proposed development. Proposals must be accompanied by sufficient information to allow for assessment of concentration and potential impacts, including information on how these uses will be managed and operated.
- B. In addition to the general assessment of overconcentration in Part A:
- (i) Proposals for hot food takeaways will be resisted within 200m of primary and secondary schools.
  - (ii) Proposals for hot food takeaways (Use Class A5) will be resisted where:
    - a. they would result in 4% or more of total units being in either A5 use, in Local Shopping Areas of 26 units or more; or
    - b. they would result in two or more A5 units, in Local Shopping Areas with 25 units or less.

- (iii) Proposals for betting shops and adult gaming centres will be resisted where:
    - a. they would result in 4% or more of total units being in either betting shop/adult gaming centre use, in Local Shopping Areas of 26 units or more; or
    - b. they would result in two or more betting shop/adult gaming centre units, in Local Shopping Areas with 25 units or less.
  - (iv) Proposals for betting shops or adult gaming centres in Town Centres will not be permitted where there is an existing betting shop or adult gaming centre within 200m; or where the resulting amount of betting shops and adult gaming centres would exceed 1.5% of the total units in the Town Centre.
- C. Where proposals for uses serving food and drink are permitted – particularly A3 and A5 uses, and A1 uses such as coffee shops and sandwich bars – a condition will be attached to require the operator to achieve, and operate in compliance with, the Healthy Catering Commitment standard.
- D. Where proposals for betting shops, adult gaming centre, payday loan shops, high interest ‘rent-to-own’ retail stores, pawnbrokers and other similar uses are permitted, conditions may be attached (where relevant) to:
- (i) require the display of information about local credit unions, debt advice services and/or gambling addiction charities;
  - (ii) require the operator to sign up to, and operate in compliance with, any scheme(s) which promotes community safety and/or other good practice; and,
  - (iii) require the display of information about any applicable interest rates, fees and charges.

4.101 Due to the borough's densely developed, mixed-use nature, a range of main Town Centre uses occur in close proximity to places where people live, work, study and socialise. It is important to ensure a mix and balance of complementary day and night-time uses that creates an attractive and vibrant area that co-exists successfully with neighbouring residential areas and does not significantly compromise well-being. Certain types of use can cause detrimental cumulative impacts as a result of their concentration and/or location. The council will resist applications for such uses where they would cause harm to the vitality and viability, character, function and amenity of an area and/or negatively impact on the health and wellbeing of the borough's residents. The impact on deprived areas in particular will be assessed.

4.102 In assessing the likely impacts of a proposal, regard will be had to the type of use, proposed hours of opening, size of premises, operation and servicing, and measures to mitigate odour and noise from the premises. The council will also consider whether the proposal is likely to increase or create a negative cumulative impact in the surrounding area (generally within a 500m radius of the site). The 500m radius is established as a sensible straight line distance from the location of the proposed use to measure cumulative impacts taking account of Islington's relatively small spatial area and dense urban development. Proposals will be resisted that would result in unreasonable negative cumulative impacts that cannot be adequately mitigated. The

council's Licensing Policy will also be a material consideration in assessing potential impacts of proposals.

- 4.103 The policy has restrictions (percentage and/or quantum of units) for hot food takeaways (Use Class A5) and betting shops and adult gaming centres (Sui Generis). These restrictions are necessary due to the adverse impacts on health and wellbeing and vitality and viability of retail centres that these uses can cause. These restrictions are part of a wider comprehensive approach to tackle the causes of ill health, in co-operation with other council departments including Public Health. The restrictions, either the percentage or the quantum, may be updated in future through a Supplementary Planning Document.
- 4.104 The level of overweight or obese children in Islington is consistently above both the national and London average. Evidence shows that nearly two thirds of schools in Islington have at least one hot food takeaway within 200m of the school entrance. As part of a comprehensive package of measures to tackle this issue, the council will resist proposals for hot food takeaways within 200 metres of primary and secondary schools.
- 4.105 All applications for A5 Hot Food Takeaway's or Betting Shops should provide a Management and Operating Strategy which includes all the standard information needed when the operator applies for a premises licence. Management and Operating Strategies should also consider any other potential impacts on vitality, viability, character, amenity, function and health and wellbeing.
- 4.106 A5 uses are often associated with unhealthy food, but they are not the only type of premises to serve unhealthy food; A1 and A3 uses such as newsagents, coffee shops and cafes also often sell/serve unhealthy food. Applications for relevant A1, A3 and A5 uses will therefore be conditioned to achieve, and operate in compliance with, the Healthy Catering Commitment standard. This will help provide easier access to healthier food across the borough.
- 4.107 Islington has a relatively high number of betting shops, compared with other boroughs in London and across the country. Betting shops can have a variety of adverse impacts on communities including worsening mental health (particularly with incidences of problem gambling) and exacerbating incidences of anti-social behaviour and crime. There is evidence of betting shops clustering in deprived areas, and this will be a key consideration as part of any assessment of overconcentration. Tools such as the Gambling Risk produced by Geofutures may be utilised to inform this assessment.
- 4.108 Betting shops, payday loan shops, high interest 'rent-to-own' retail stores, pawnbrokers can have adverse impacts on health and wellbeing. The council requires that any of these premises must operate in a transparent manner and clearly display information relating to interest rates; fees; charges; and information about debt advice and gambling support.
- 4.109 Further information on the implementation of Policy R8 is provided in the Location and Concentration of Uses Supplementary Planning Document.



## Policy R9: Meanwhile/temporary uses

- A. Applications for meanwhile/temporary use of individual vacant A1-A5, D2 or Sui Generis uses in Town Centre locations and in the Central Activities Zone will be supported where:
- (i) The temporary use sought is within A use class, B1 or D2 use or is, in the council's view, a suitable community and/or cultural use;
  - (ii) The period of meanwhile/temporary permission is less than 6 months, and no more than one previous temporary permission have been granted since the last permanent occupation of the unit/building/site;
  - (iii) Potential adverse amenity impacts are prevented or mitigated; and
  - (iv) The meanwhile/temporary use does not preclude permanent use of the site for appropriate main Town Centre uses, which includes consideration of the amount of previous temporary permissions.

- 4.110 Vacant premises can detrimentally affect the vibrancy, vitality and viability of places. The efficient use of land is crucial to sustain a vibrant and engaging built environment and vacant premises can provide opportunities for businesses to establish themselves. This is especially applicable to start-ups and businesses within the creative industries.
- 4.111 The council will encourage meanwhile/temporary use of A-use, D2 and Sui Generis main Town Centre use units/building/sites in the CAZ and Town Centres, where potential adverse impacts are prevented/mitigated. Temporary use should not preclude permanent occupation of units/buildings/sites, and the council expect marketing exercises for permanent occupation for an appropriate use to continue throughout the temporary occupation (pending consistency with relevant policies).
- 4.112 Any meanwhile/temporary use consistent with criteria in policy R9 will not count as occupancy for the purpose of continuous vacancy (as required by other Local Plan policies), provided that the total cost of renting the unit for temporary occupants is free or at a very low percentage of the prevailing market rate for similar uses in the area; and the units are let, as a priority, to start-ups or small businesses. Without such rent reductions for temporary occupiers, the council will consider that the temporary use breaks the continuous vacancy period required by other Local Plan policies.
- 4.113 If the council consider a site/premises/unit has been made deliberately vacant to secure temporary permission, the application will be refused.
- 4.114 Meanwhile/temporary uses have the potential to create adverse amenity impacts on the surrounding environment. Adverse amenity impacts could include noise from ingress and egress of the building or space, anti-social behaviour, inappropriate servicing and delivery, vibration, access and safety, amongst other things. The temporary nature of a use is not enough, by itself, to mitigate any adverse impacts. All applications for temporary use must demonstrate that all potential adverse impacts are prevented/mitigated. Evidence should be submitted to the council as part of an

application that considers potential adverse amenity impacts and the measures to be undertaken to mitigate these impacts.

4.115 Meanwhile/temporary uses can help activate space in the daytime, for example, cultural or night time economy uses which do not ordinarily open during the day. The council will encourage temporary/meanwhile uses in such circumstances, where proposals are consistent with the other requirements of Policy R9.

4.116 To encourage meanwhile/temporary use of vacant A use, D2 use and Sui Generis units, the Council will explore the potential to implement a meanwhile/temporary Use Local Development Order (LDO) which permits temporary uses in specific locations, where certain conditions are met.

## **Policy R10: Culture and the Night Time Economy**

- A. New cultural uses should be located in the Central Activities Zone or Town Centres, particularly in Cultural Quarters. Such uses should:
- (i) Complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;
  - (ii) Be accessible by a range of sustainable transport modes, including walking, cycling and public transport; and,
  - (iii) Provide high quality buildings that are designed to be inclusive, accessible and flexible.
- B. Proposals involving the redevelopment and re-provision of cultural uses, or intensification of existing cultural uses (except for public houses), will only be acceptable on sites within the Central Activities Zone or Town Centres, and must:
- (i) Ensure that the function and role of the existing cultural use is not diminished or put at risk by any proposed changes, particularly where proposals involve development of other uses (including sensitive uses such as residential) as part of mixed use redevelopment;
  - (ii) Provide high quality buildings that are designed to be inclusive, accessible and flexible, and in the case of proposals for intensification, explore opportunities to improve design standards in existing buildings;
  - (iii) Be conditioned to ensure retention of the specific cultural use; and
  - (iv) Where there is a significant intensification of the cultural use, incorporate appropriate measures to limit effects of sound, vibration and other effects of the re-provided/intensified cultural use on existing and potential future land uses in the area, in line with the 'agent-of-change' principle.
  - (v) Where use is only intended to operate during evening/night-time hours, investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis.

- C. The loss and/or change of use of cultural facilities in the borough will be strongly resisted. Any proposals for the loss and/or change of use of such facilities must:
- (i) Demonstrate that the premises have been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no reasonable prospect of the unit being used for continued cultural use or other suitable cultural or commercial uses consistent with the character and function of the area;
  - (ii) Ensure that the character of an area and/or any wider cultural function is not adversely impacted by the loss; and
  - (iii) Ensure that the proposed use is appropriate for the area, including through assessment against the agent-of-change policy DH5.
- D. Proposals for new night-time economy uses (including redevelopment/intensification of existing night-time economy uses) will only be acceptable within the Central Activities Zone or in Town Centres. Where proposed, night-time economy uses should:
- (i) Complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation, of these uses, in line with the 'agent-of-change' principle;
  - (ii) Demonstrate that there would not be a significant adverse effect on amenity or function, particularly impacts on residential uses;
  - (iii) Promote access via sustainable modes of transport and avoid reliance on private vehicular transport, including private hire vehicles; and
  - (iv) Where use is only intended to operate during evening/night-time hours, investigate potential for allowing daytime uses to activate the space, including on a meanwhile basis.

4.117 Cultural uses are unique assets which add significant value to the social fabric and economy of Islington. Such uses often have distinct social and economic benefits, although cannot be specifically defined (in terms of planning use classes). Cultural facilities evident in Islington includes music and other entertainment venues, cinemas, artist studios and galleries, theatres, pubs, museums and the Emirates Stadium, working men's clubs, arts and crafts spaces, bingo halls, community centres, in addition to a number of heritage assets. Some of these are also night-time economy uses.

4.118 The impact of development in close proximity to cultural uses is arguably the biggest threat which these uses face; close proximity is considered to be any distance where vibration, noise – including airborne noise - and/or the operation of a cultural use – such as regular ingress/egress routes – could cause amenity impacts for surrounding uses. The 'agent-of-change' principle set out in policy DH5 requires that the person or organisation responsible for change – such as a planning applicant who proposes new residential units near an existing cultural use – is responsible for managing the impact of that change. Cultural uses are inherently sensitive to the introduction of new uses, given their function can generate noise and significant pedestrian movements. It is therefore important that new uses in close proximity to cultural uses fully prevent any adverse impacts which may arise in future (such as noise complaints, which give rise

to licensing restrictions and incur costs and administrative burdens) and give cultural uses maximum opportunity to continue operating and contributing to Islington's cultural offer. This should also include reasonable opportunity for cultural uses to expand their offer.

4.119 The approach to cultural uses operates in tandem with other policies aimed at ensuring that Islington maintains its role for shopping, business, education and culture, alongside the need to deliver housing to meet the borough's housing target. Therefore, while strong protections are in place to protect the continued operation of existing cultural uses where new development is proposed, the reverse also applies, and new or significantly intensified cultural uses should follow the 'agent-of-change' principle to ensure that any potential adverse impacts on uses in the immediate area – particularly uses sensitive to noise such as residential - are prevented or satisfactorily mitigated. Where cultural uses are intensified or re-provided as part of redevelopment, conditions will be attached to any permission to remove any applicable permitted development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that specific cultural use(s) are retained and that any future loss is assessed against Local Plan policies via a planning application.

4.120 In certain circumstances, where agreed by the council, non-physical measures, particularly a deed of easement, may be used to mitigate residual impacts which cannot be mitigated through physical measures alone; this is a legal agreement which essentially gives existing noise generating uses immunity from future complaints from occupiers of new development.

4.121 A cultural quarter designation can reflect an aspiration to expand cultural provision in an area, or can cover areas where there is already a broader level of cultural activity which should be retained and enhanced. Renewal and enhancement of heritage or otherwise distinct townscape can support the function and role of cultural quarters. Residential use is particularly sensitive to noise and other potential impacts of cultural uses, therefore new residential uses (both conventional and non-self-contained) within cultural quarters will generally only be permitted on sites allocated for residential development, where they accord with other relevant Local Plan policies. This strikes a balance between allowing the cultural role of the designated quarters to develop and prosper while providing targeted opportunities for new residential development to meet the borough's housing targets.

4.122 Islington has designated three cultural quarters:

- Angel Town Centre is designated as a cultural quarter to reflect its role as the principal cultural destination in Islington and the contribution that this confluence of cultural uses makes to the wider Islington and London economy.
- Part of the area around Clerkenwell and Farringdon is designated as a cultural quarter to protect and promote the unique concentration of cultural uses and heritage assets in this area, and reflect the concentration of related creative industries.
- Archway Town Centre is designated as a cultural quarter to encourage the increasing cultural offer in the centre, including a variety of creative enterprises and independent retailers.

4.123 A cultural quarter can contribute to wider objectives around improving the quality and economic vitality of an area. Key to the success of a cultural quarter is the encouragement of a mix of supporting daytime and night-time uses, which can include

space for arts and creative industries and meanwhile uses, to support the overall cultural function. However, it is important that the development of cultural uses within each quarter responds to the character and function of the respective areas.

- 4.124 The loss of cultural facilities, not just in the most significant commercial parts of the borough but also in other smaller/dispersed locations, can have a significant detrimental impact on local character and the function of an area. Such loss will be strongly resisted.
- 4.125 Music venues in particular – including pubs which have a frequent live music offer - highlight the potential dual economic and social role of a cultural use. They are frequented by people from all walks of life, which fosters inclusivity; and can contribute significantly to the local economy both in their own right and as a destination which encourages supporting activities. Across London, music venues are in decline due largely to development pressures and an increase in residential uses located in close proximity to existing venues. Falling within the definition of a cultural use and also part of the night time economy, music venues usually D2 or Sui Generis use will be afforded strong protection in future. The council supports development of new music venues where appropriate.
- 4.126 The daytime use (including meanwhile/temporary use) of cultural venues that operate solely or predominantly at night can greatly enhance the cultural offer and economy of Town Centres and the CAZ. This can increase employment and add to the vibrancy of an area. A class uses and B1 uses are considered particularly suitable uses in this context.
- 4.127 Appropriate design is a case-by-case issue taking into account the context of a specific site/area. Particular design issues which may be relevant to the cultural and night time economy venues includes noise, inclusion, safety, surveillance and crime prevention. The council will require all new development to satisfy inclusivity principles in line with the Inclusive Design in Islington SPD and the Islington Urban Design Guide, as well as relevant best practice and guidance. It is important for cultural facilities to be able to be accessed by all and allow disabled Islington residents and visitors to participate fully in the rich cultural offer Islington has to offer.
- 4.128 The council's strategic employment policy notes the importance of the 24-hour economy, which ensures that a variety of economic activities – both activities which drive and support economic growth – can take place across the borough to help achieve the council's economic ambitions. The specific night-time economy plays an important role in realising these ambitions. There is crossover between night-time economy uses and cultural uses but the latter holds a wider definition. For the purposes of this policy, night-time economy uses generally fall within the A3, A4, A5, D2 and sui generis use classes, although this should not be considered exhaustive and could include other uses – for example some D1 uses such as art galleries.
- 4.129 Night-time economy uses can contribute positively to the vitality and vibrancy of Town Centres and the CAZ. However, if not properly managed, such uses can result in adverse amenity impacts for local residents and businesses (both individual and cumulative impacts) generated from anti-social behaviour, litter, noise and disturbance. To achieve a balance and protect the amenity of the borough's predominantly residential areas, night-time economy uses will generally be directed towards Islington's Town Centres or the Central Activities Zone. Proposals outside these areas are considered inappropriate.

4.130 Proposals involving night-time economy uses in the CAZ which fall within the boundary of the Bunhill and Clerkenwell AAP will be assessed against relevant policy in the Bunhill and Clerkenwell AAP as well as any other relevant Local Plan policies.

4.131 Licensing and Planning are separate functions and refusal of licensing would not result in planning consent automatically being refused. However, the council's Licensing Policy, which identifies areas affected by negative cumulative impacts of entertainment and similar uses, will be a material consideration in assessing proposals. Planning determinations (including planning conditions) will have regard to Islington's Licensing Policy in relation to proposed hours of opening, operation and servicing, and measures to mitigate odour and noise from the premises. The council's Environmental Health and Public Health functions are also important considerations for any proposals involving new night-time economy uses.

4.132 Specific clusters of night-time economy uses contribute more significantly to the night-time economy, particularly within the night-time economy clusters identified in the London Plan, and therefore the introduction of sensitive uses may threaten the effective operation of night-time uses more acutely in these areas.

## **Policy R11: Public Houses**

- A. The council will resist the redevelopment, demolition and Change of Use of any Public House which:
- (i) has demonstrable community/social value;
  - (ii) contributes to the cultural fabric of the borough, including consideration of any historic/heritage features; and/or
  - (iii) contribute to the economy of the borough, particularly the night-time economy.
- B. Applications for the Change of Use, redevelopment and/or demolition of a Public House which meets any of the criterion in Part A must demonstrate that:
- (i) the Public House has been vacant for a continuous period of at least two years. Continuous marketing evidence to cover this period must be provided, to demonstrate that there is no realistic prospect of the unit being used as a Public House in the foreseeable future;
  - (ii) the proposed alternative use will not detrimentally affect the character, vitality and viability of the area; or the amenity or future operation of land uses in the immediate area (including ongoing operation of the Public House where a partial change of use is proposed, e.g. on upper floors);
  - (iii) appropriate, documented measures have been undertaken to improve the viable operation of the public house, which have proven unsuccessful;
  - (iv) The condition of the pub is conducive to occupation; and

(v) significant features of historic or character value are retained.

C. Visitor accommodation which is proposed on any non-operational upper floors of a Public House, and which is clearly subservient to the Public House function, may be appropriate where:

(i) Any adverse impacts on the operation of the Public House, particularly relating to issues of security, are prevented through design;

(ii) The visitor accommodation does not lead to any intensive additional delivery and servicing requirements;

(iii) Visitor accommodation meets inclusive design standards;

(iv) Proposals comply with design requirements set out policy R12 Part D; and

(v) Visitor accommodation is designed, leased and operated as a hotel for temporary occupation. Where necessary, conditions will be used to ensure that visitor accommodation is not permanently occupied.

4.133 Islington's Public Houses form an integral part of the urban fabric and many are closely associated with the life and identity of local communities; a pub can be the focal point of a neighbourhood or street and can play an important social and economic role, either in a specific locality or across a wider area.

4.134 Islington has retained a substantial number of Public Houses, which are valued by local residents and visitors to the borough, but there is increasing pressure to convert pubs to other uses. The council will resist proposals that result in the removal of a Public House or a Change of Use away from the A4 Use Class, particularly where this would result in loss of heritage and/or social/community value, and/or would constitute the loss of a pub which contributes to the night-time economy.

4.135 When assessing a pub's community value, the council has no set criteria it will use to make this assessment but this could include consideration of factors such as comments made on the proposed application, petitions and/or asset of community value designations.

4.136 Public houses can contribute positively to the vitality of Town Centres, local shopping areas and communities in Islington. They can also contribute to the night time economy and serve the leisure demands of residents and visitors alike. The contribution to the night time economy will be thoroughly assessed for applications seeking a change of use from an A4 use.

4.137 Continuous marketing and vacancy evidence will be required, demonstrating lack of demand for the Public House. Appendix 1 sets out the information to be provided in relation to marketing of vacant floor space. The marketing and vacancy requirement applies to full and partial change of use, including proposals which propose change of use in conjunction with a retained pub use. Such proposals should market the pub in its entirety.

4.138 Applications for the Change of Use, redevelopment and/or demolition of a Public House which meets any of the criterion in Part A must demonstrate appropriate,

documented measures have been undertaken to improve the viable operation of the public house. These measures could include the proactive diversification of the pub's offer through the introduction of a food offer, the serving of non-alcoholic beverages; sports screenings; events such as pub quizzes, live music, comedy, community events; and/or the use of the pub as a hub for parcel collection, amongst other things.

- 4.139 The condition of a public house should not preclude occupation. If a public house is in poor condition, it will not be an attractive proposition for prospective tenants, which undermines the marketing requirement set out in policy R11.
- 4.140 Proposals for the change of use (either full or partial change of use), redevelopment and/or demolition of a Public House must prevent/mitigate adverse impacts on local amenity or future operation of land uses in the immediate area, in line with policy DH5.
- 4.141 The change of use of non-operational upper floors of Public Houses – i.e. upper floors which are not being utilised by the Public House as bar space, dining rooms, kitchens or other such use – to visitor accommodation may be appropriate where, inter alia, it does not affect the continued operation of the Public House and is clearly subservient to the Public House function, – i.e. it does not detract from the primary public house use in terms of scale, access arrangements and/or signage.
- 4.142 Any change of use from A4 should maintain an active frontage which engages positively with the street scene. Public Houses often provide an active frontage which engages with a wide demographic in the daytime and night time, therefore a loss of an active frontage may be detrimental to the character of an area.
- 4.143 Where a public house proposes to use any non-operational upper floors for visitor accommodation, proposals must ensure bedrooms are wheelchair accessible in line with Policy R12 (unless this provision is demonstrated to be impractical due to design limitations). Further guidance can be found in the Inclusive Design in Islington SPD.

## **Policy R12: Visitor accommodation**

- A. Proposals involving the development, redevelopment and/or intensification of visitor accommodation will only be permitted on:
- (i) sites allocated for visitor accommodation; or
  - (ii) sites with existing visitor accommodation in Town Centres and the CAZ
- B. Proposals under Part A(ii) involving the redevelopment/intensification of existing visitor accommodation will only be permitted where:
- (i) Opportunities for development of other uses, particularly business floor space, have been clearly proven to be infeasible, in line with relevant policies and priorities; and
  - (ii) The proposal is consistent with other Local Plan policies, particularly relating to design, sustainability and transport.



- C. Visitor accommodation which is proposed on any non-operational upper floors of a Public House, and which is clearly subservient to the Public House function, may be appropriate as set out in Policy R11. Such visitor accommodation must meet criteria set out in Policy R11 Part C.
- D. All proposals involving visitor accommodation – development, redevelopment and/or intensification – must fully address the following criteria:
  - (i) Any adverse impacts on nearby residential amenity, including cumulative impacts, must be prevented or appropriately mitigated;
  - (ii) Appropriate arrangements must be put in place for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the visitor accommodation;
  - (iii) Where visitor accommodation is provided as part of a mixed-use development, full separation of uses should be provided where possible;
  - (iv) A good standard of amenity and safety, and an acceptable level of noise, vibration, daylight and sunlight is provided. Proposals must be inclusive, providing at least 10% of all rooms to wheelchair accessible standards (fully fitted from occupation); and
  - (v) Ancillary facilities which are open for public use and create employment opportunities for local residents - such as restaurants, gyms and conference facilities - should be provided where appropriate.
- E. The council will afford preference to visitor accommodation that is designed, leased and operated as a hotel for temporary occupation. Where necessary, conditions will be used to ensure that visitor accommodation is not permanently occupied.
- F. Any proposal for the change of use of existing conventional or non-self-contained residential accommodation to visitor accommodation (both temporary and permanent change of use) will be refused.

4.144 Visitor accommodation refers to any building or place that provides temporary or short term accommodation on a commercial basis. This includes hotels, hostels, bed and breakfasts, apart-hotels and any other visitor accommodation model that meets this definition.

4.145 Development, redevelopment and/or intensification of visitor accommodation will be suitable on sites specifically allocated for visitor accommodation in the Local Plan. The NPPF regards visitor accommodation as a main Town Centre use. While Islington will not permit new-build visitor accommodation in Town Centre locations, redevelopment/intensification of existing visitor accommodation in Town Centres and the CAZ may be acceptable.

4.146 On current mixed use sites, the intensification of visitor accommodation may be acceptable in line with the policy requirements but policies that promote the maximisation of other priority uses will be given precedence in terms of assessing the proposed mix of uses.

- 4.147 A key priority of the Local Plan is the maximisation of business floorspace and development of new housing, particular affordable housing. Therefore, redevelopment/intensification of existing visitor accommodation must fully consider opportunities for development of other uses which are considered a greater priority.
- 4.148 Co-location of visitor accommodation and other uses may be suitable where security issues are prevented via full separation of uses. Applications for new visitor accommodation should set out how security measures and other potential adverse impacts – including after-hours ingress and egress by guests - would be mitigated via submission of a detailed management strategy.
- 4.149 Visitor accommodation is considered an acceptable use on upper floors of Public Houses in Islington, as it can support the continued operation of the Public House and hence ensure the retention of an important community facility. Such proposals must meet criteria in policy R11.
- 4.150 Well-designed, accessible, sustainable visitor accommodation is likely to remain attractive to a range of visitors for the long-term, whereas poorly designed accommodation is likely to become redundant more quickly, potentially manifesting in additional demand for visitor accommodation in the future. At least 10% of new hotel bedrooms must be wheelchair accessible, which includes additional rooms created through redevelopment and/or intensification of existing visitor accommodation. Wheelchair accessibility refers to, inter alia:
- sufficient wheelchair turning space;
  - wheelchair accessible bathrooms; and
  - sufficiently wide doorways and doors that do not restrict a person's ability to access rooms with ease.
- 4.151 The 10% wheelchair accessible rooms will be required to be fitted from the outset of the development, including all spatial provisions, fixtures and fittings. Further information on requirements can be found in the Inclusive Design in Islington SPD.
- 4.152 Visitor accommodation and ancillary facilities should also be designed to be 'visitable'. This refers to the provision for someone of all physical abilities to access the visitor accommodation through step free access with appropriate lobby dimensions and a wheelchair accessible lift. The Inclusive Design in Islington SPD sets out the specific standards for visitability.
- 4.153 Visitor accommodation is very energy intensive due to the amenities and facilities that are commonly provided; it also has significant levels of water consumption. It is therefore essential that any development, redevelopment and/or intensification of visitor accommodation incorporates all relevant sustainable design measures, in line with relevant sustainable design policies in chapter 7.
- 4.154 All proposals must demonstrate that all visitor accommodation rooms will provide an adequate standard of amenity to occupants, particularly in terms of circulation, outlook, ventilation (in accordance with the sequential cooling hierarchy set out in policy S6) and noise insulation. Design of visitor accommodation should also provide appropriate levels of daylight for occupants.

- 4.155 Proposals involving redevelopment and intensification of existing visitor accommodation rooms should look to enhance the quality of existing rooms in line with the design, accessibility and sustainability requirements set out in the Local Plan.
- 4.156 Apart-hotels often display characteristics associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide, but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use Classes, depending on their characteristics, such as (amongst others):
- Minimum / maximum lease lengths
  - Presence of on-site staff / management
  - Presence of reception, bar or restaurant
  - Provision of cleaning and administrative services
  - Ownership of units / ability to sell on open market
- 4.157 Where apart-hotels are considered to fall within the C3 Use Class, proposals will be assessed via relevant housing policies in the Local Plan including the requirement to provide affordable housing. Conditions will be used to ensure units are subject to minimum lease lengths. For proposals within the C1 Use Class, the council will take steps to ensure that units would not be used or occupied by permanent households, including students, on the basis that this would be contrary to the sustainable development of Islington and would put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days) to preclude permanent occupation of C1 units.
- 4.158 The Deregulation Act 2015 relaxed restrictions on the use of residential premises as short-term visitor accommodation, meaning that properties being used as short-term visitor accommodation will require planning permission only where lettings are in excess of 90 nights in any calendar year or lettings are offered by somebody who isn't the council tax payer at the property. This has led to a significant increase in the use of residential accommodation as short-term lettings, facilitated by commercial short-term lettings websites such as Airbnb and One Fine Stay. There is particular concern that widespread use of residential accommodation as short-term lets is causing amenity impacts for nearby residents and leading to security and privacy issues, especially where short-term lets are within blocks of flats where several properties are accessible by the same entrance. The short-term letting phenomenon is also undermining efforts to meet local housing need by limiting the use of residences for permanent occupation; it is a loss of housing supply.
- 4.159 There is also pressure to utilise non-self-contained accommodation, particularly student accommodation, as short term lets over the summer period, which could also undermine action to meet housing need.
- 4.160 This issue is primarily an enforcement matter, but any applications to convert existing residential accommodation – both self-contained and non-self-contained dwellings – to visitor accommodation will be refused. For avoidance of doubt, this includes applications for permanent and temporary change of use.

# 5 Green infrastructure

## Policy G1: Green Infrastructure

- A. Green infrastructure is an integral part of what makes the borough sustainable, healthy, welcoming and attractive. It is extremely important in terms of addressing the Local Plan objectives. Development proposals should preserve and enhance existing green infrastructure, and, where relevant, provide new green infrastructure. Opportunities to connect new/enhanced green infrastructure to existing green infrastructure should be thoroughly investigated.
- B. Developers should consider green infrastructure at an early stage of the design process as part of an integrated design approach and incorporate the provision of green infrastructure into the design rather than as an 'add on' at the end of the design process.
- C. Development proposals should assess the value and benefits of existing green infrastructure on site, and identify interventions that could improve green infrastructure value and benefits.
- D. Sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions. The Council will not consider existing site circumstances as the baseline for new provision.
- E. Major developments are required to conduct an Urban Greening Factor assessment in accordance with the methodology in the London Plan. Schemes should achieve an Urban Greening Factor score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.
- F. Development should contribute to the implementation of green infrastructure strategies including the All London Green Grid.

5.1 Green infrastructure refers to the network of green spaces, street trees, green roofs, and other assets such as natural drainage features. A strategic approach to green infrastructure approach ensures these assets are planned, designed, and managed in an integrated way to meet multiple objectives, including:

- promoting mental and physical health and wellbeing;
- encourage social interaction, bringing together people from across the community;
- adapting to the impacts of climate change, including helping to reduce flood risk;
- improving air and water quality;

- encouraging walking and cycling;
  - conserving and enhancing biodiversity and ecological resilience; and
  - more traditional functions of green space such as play, sport, and recreation.
- 5.2 Green Infrastructure is a form of natural capital, which provides direct and indirect benefits to people. These benefits include clear air and water, cooling to lessen the impacts of climate change, provision of a better environment for walking and cycling, promoting healthier living, and providing habitat for biodiversity and ecological resilience. Development of the green infrastructure network is particularly important in Islington. Islington has the highest population density of any Local Authority in England. Large areas of the borough are deficient in public open space with limited opportunities to create significant new open spaces. In addition, the population of Islington is projected to grow, putting further pressure on this limited resource.
- 5.3 The Council supports the concept of natural capital accounting whereby the value of green infrastructure is assessed including economic benefits that are not generally included in financial accounting balance sheets. Through this process the true value of green infrastructure to people living, working, and visiting Islington can be identified.
- 5.4 Green infrastructure interventions include:
- Creation of parks and gardens, sport pitches and facilities, and allotments and community gardens;
  - Creation of habitats within open spaces and on buildings, such as green roofs, vertical greening and planting on terraces;
  - Planting trees and natural landscaping on streets, waterways, and railway lines;
  - Provision of wildlife habitat features, such as bird and bat boxes;
  - Incorporating insect attracting plants in landscaping;
  - Sustainable Urban Drainage Systems (SUDS) such as incorporating green roofs, tree pits and rain gardens; and
  - Making existing green spaces accessible to the public.
- 5.5 The London Plan includes an interim London wide Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. Islington Council will use the London wide model in the determination of planning applications, but may in time develop a local model through further supplementary guidance. The Council will expect developers to design urban greening into developments from the earliest possible stage and take every opportunity to incorporate urban greening interventions into their development.
- 5.6 The Mayor of London has published the All London Green Grid Supplementary Planning Guidance (SPG) to support the implementation of the Green Infrastructure policies of the London Plan. A series of Area Frameworks expand on this by setting out objectives and strategic opportunities. The Council expects schemes to implement these green infrastructure strategies where they apply.

## Policy G2: Protecting open space

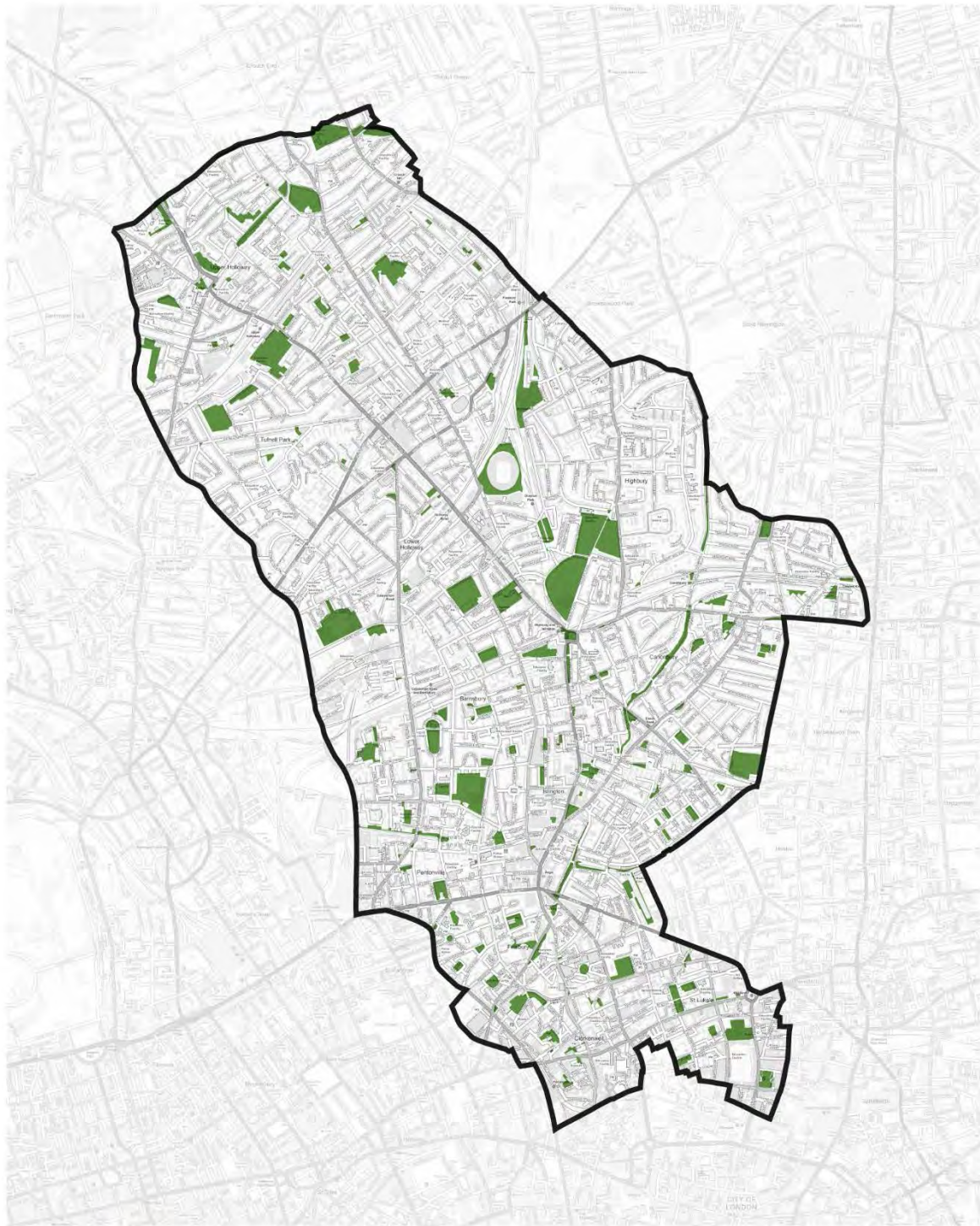
- A. Development is not permitted on any public open space and significant private open spaces.
- B. Development within the immediate vicinity of public open space must not impact negatively on the amenity, ecological value and functionality of the space. All impacts must be prevented/mitigated through the design of the scheme.
- C. The Council will protect open space on housing estates. Where development is proposed on open spaces on housing estates, on-site re-provision of the same quantum of space of an improved quality is encouraged. Full loss of open space will be resisted. Proposals which will lead to a net loss but which will re-provide a quantum of on-site open space which is both functional and useable may be acceptable where:
  - (i) the lesser amount of space is of a higher quality;
  - (ii) multi-functional use of the space is encouraged, for example use as play space and/or climate change mitigation (as appropriate);
  - (iii) permeability and connectivity within and between spaces is improved, ensuring that the space remains substantially undeveloped and open, and that accessibility to the general public is improved;
  - (iv) rationalisation of estate car parking has been fully explored, in order to offset the loss of open space as far as possible and in accordance with the council's car-free policy;
  - (v) Where the existing estate car parking has not been rationalised as part of the proposal, robust justification must be provided; and
  - (vi) improvements to alternative open space provision in the immediate area are investigated, to offset the loss of open space as part of the proposal.
- D. Development of private open spaces will not be permitted where, individually or cumulatively:
  - (i) The site makes a valuable contribution to the character and appearance of the surrounding area, including its open aspect;
  - (ii) The site is of biodiversity value, including consideration of ecological connectivity in the wider area;
  - (iii) The site is of social or community value, for example, areas that provide access to green space and nature;
  - (iv) The site makes, or has the potential to make, a contribution to mitigating the impacts of climate change, including urban cooling and reducing flood risk; or
  - (v) The development would have a harmful impact on the amenity of future or neighbouring occupiers through its future development.

5.7 Islington benefits from a range of open spaces including parks and gardens, natural green spaces and corridors, allotments and community gardens, urban hard landscaped areas like civic spaces and public realm, cemeteries and churchyards, open space on housing estates, playgrounds, and canal spaces. Islington is also home to two spaces identified as Metropolitan Open Land - Highbury Fields and Parkland

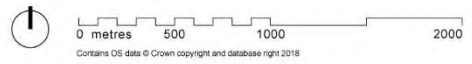
Walk. Areas of open water like the Regent's Canal and City Road Basin are considered public open space because of the amenity, sport and recreation value and the wildlife habitat value.

- 5.8 However, Islington is the most densely populated local authority in the country with one of the lowest amounts of greenspace per person resulting in intensive use of open spaces and areas of open space deficiency. Open spaces in Islington are under pressure and it is essential to protect and expand provision of open space particularly given the projected population growth.
- 5.9 The Council will protect all open spaces, including private open spaces not designated on the Policies Map should these be later identified including during the assessment of a planning application. Designated public open spaces are identified on the Policies Map. For reference, Figure 5.1 also shows the location of these spaces:

**Figure 5.1 – Local Plan Public Open Space Designations**



 Designated open space





- 5.10 Islington has many large housing estates spread across the borough which are home to around 400 open spaces. These spaces are not formally designated as open space, however they constitute a significant resource and are highly valued by the community. As well as being multi-functional spaces which have many of the same attributes as designated open space, these spaces act as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates.
- 5.11 These spaces should be protected, although some net loss of space as part of redevelopment may be acceptable where specific criteria are addressed.
- 5.12 Private open space is an integral part of the boroughs green infrastructure. It can include small private open spaces such as gardens and also larger private open spaces such as Charterhouse Square, the Honourable Artillery Company Grounds and a number of churchyards in the borough. Existing green roofs are considered to be private open spaces for the purposes of this policy. These undesignated open spaces are essential to the character and appearance of the borough and can also help improve amenity, air quality, drainage, cooling, biodiversity, ecological connectivity, and access to nature, as well as health and wellbeing (although a private open space may not perform all these functions). Their protection is particularly important in Islington due to the high density of development and open space deficiency.
- 5.13 Gardens, including front gardens, are at particular risk in the borough and have been under increasing pressure from development over recent years. While development in one garden may have only a small impact, the cumulative effects of reduced garden space (at a local and regional level) is significant, for example by collectively reducing the amount of permeable surfaces to deal with increasing risks of surface water flooding, by reducing biodiversity and ecological connectivity, and by impacting on the overall open and green character of the borough.
- 5.14 In relation to the development of private open spaces, a proposal will be assessed based on the character and value of the private open space and its relationship to the site surroundings. Development proposals should maintain the open aspect of the site and retain the existing functionality of the site in terms of factors including amenity value, biodiversity value and mitigation of climate change impacts. Development proposals for impermeable paving should be refused on small surfaces such as front gardens and driveways. Soft landscaping features should be retained and enhanced where possible, and permeable surfaces should be used where hard landscaping is required.
- 5.15 The council will protect existing allotments and other community gardening projects.

### **Policy G3: New public open space**

- A. Developments in excess of 200 net additional residential units or 10,000sqm net additional gross external floorspace, or where a specific need has been identified by the council, are required to provide on-site publicly accessible public open space. The level of provision should be proportionate to the size of the proposal and the number of intended occupiers/users. Public open space must be provided in addition to private amenity space and landscaping and must provide unrestricted public access, in perpetuity.
- B. Public open space should normally be green public open space, such as a public park. Areas of new or improved hard landscaped public open space, such as civic space, may be considered appropriate instead of green public open space in certain areas (such as Town Centres), and will be assessed on a case-by-case basis. In such cases it must be demonstrated that the provision of green public open space is not possible or appropriate. Hard landscaped space must maximise greening features such as planting and permeable paving.
- C. New or improved public open space provision must:
  - (i) Create/improve links with other green infrastructure and create/improve permeability with the wider area should be investigated;
  - (ii) maximise biodiversity benefits and access to nature by incorporating areas of biodiversity, that complement surrounding habitats and support the council's Biodiversity Action Plan;
  - (iii) maximise sustainability benefits, including urban cooling and sustainable drainage, including the use of permeable surfaces;
  - (iv) should be designed to accommodate and encourage safe physical activity for all, promoting walking, cycling and social interaction; and
  - (v) be overlooked, designed and managed to meet diverse and changing needs.
- D. The temporary use of sites (such as those awaiting development) for public open space, sport and recreation, or nature conservation should be considered. This includes very small sites such as pocket parks.

5.16 Due to the low levels of existing open space, the dense urban nature of the borough, and projected population growth, the need for open space, particularly public open space, and the pressure on existing open space is very high. To meet this demand, the Council will ensure that new developments contribute towards new and improved public open space. Large development sites – such as the Holloway Prison site - offer an opportunity to deliver a significant amount of high quality public open space. Access to such space should be unrestricted, meaning that spaces are readily available to the public at all times or during daylight hours, regardless of ownership or management.

5.17 Access to green space has a positive influence on physical and mental health. Green space in a local area can also lead an increase in life expectancy. Green space is particularly beneficial when it is easily accessible and can be encountered as part of daily life. The aesthetic value of green space, viewed from a window for example, can also be beneficial to mental health. Developments proposals are encouraged to consider opportunities for the provision of on-site community gardening, including food growing and allotments.

- 5.18 Open space, including space within housing developments, should be overlooked; designed and managed to meet diverse and changing needs for; play, recreation and leisure for all ages and a productive ecology. These open spaces should maximise green infrastructure benefits and should normally be green. Hard landscaped areas will only be considered where it has been demonstrated that green space is not possible or appropriate. Hard landscape should incorporate permeable paving. These spaces should still maximise green infrastructure benefits, and include through routes in new developments.
- 5.19 The Council will seek on-site open space from large developments, to meet the increased demand for open space that these developments will create and will help address the overall shortfall of provision in Islington. The level of provision should be proportionate to the size of the proposal and the number of intended occupiers/users. Evidence suggests that a standard of open space of 5.21sqm per resident and 2.6sqm per employee should be provided. This standard should be used to inform the level of public open space provision.
- 5.20 Public open spaces within the functional vicinity of a Site of Importance for Nature Conservation (SINC) shall be planted with species that are beneficial to wildlife and complement the species composition in the SINC. Planting should include native species and local provenance species where appropriate, and non-native plants with biodiversity value may be suitable in some locations.
- 5.21 Temporary use of sites for open space is encouraged. It is not uncommon that sites in London are left vacant as opportunities for their development are explored. Site owners should make these spaces available to the local community for meantime open space use, such as raised beds or 'skip gardens' which can provide space for food growing.

## **Policy G4: Biodiversity, landscape design and trees**

- A. All developments must protect, enhance and contribute to the landscape, biodiversity value and growing conditions of the development site and surrounding area, including protecting and enhancing connectivity between habitats.
- B. Islington's Sites of Importance for Nature Conservation (SINCs) are areas designated for their importance for wildlife, biodiversity and access to nature. SINC boundaries are shown on the Policies Map. Planning permission will not be granted for any schemes which adversely affect designated SINCs of Metropolitan or Borough Grade 1 Importance. SINCs of Borough Grade 2 and Local Importance, and any other site of significant biodiversity value, will also be strongly protected.
- C. Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage. The Landscape Design Strategy should consider landscape design holistically from the outset of the design process and demonstrate the following:

- (i) An integrated approach to hard and soft landscaping design. Priority should be given to soft landscaping and urban greening, including areas of unconstrained planting;
  - (ii) Consideration of existing and proposed trees, hedges, shrubs and other vegetation of landscape or environmental significance, and their impact on biodiversity, sustainable drainage, air quality and urban cooling;
  - (iii) Functional, attractive and inclusive design;
  - (iv) Biodiversity benefits and ecological connectivity have been maximised, including through the protection and enhancement of existing biodiversity, and the incorporation of new areas of biodiversity and opportunities for wildlife, including through green roofs and vertical greening;
  - (v) Incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation;
  - (vi) Incorporation of suitable wildlife habitats, including micro-habitats;
  - (vii) A robust planting design that can sustain itself without intensive maintenance and/or intervention;
  - (viii) Appropriate maintenance arrangements that will be put in place from the outset of the development; and
  - (ix) Integration of food growing opportunities, where feasible and practical.
- D. All developments must protect and enhance site biodiversity, including wildlife habitats, trees and measures to reduce deficiencies in access to nature. Developments involving refurbishment and/or extension of existing buildings must be designed and implemented to reduce impact on existing species and their habitats.
- E. Biodiversity benefits and ecological connectivity must be maximised through planting design, ecological landscaping, and the incorporation of areas of biodiversity that complement surrounding habitats and support the council's Biodiversity Action Plan. Species chosen for planting must maximise biodiversity benefit, be beneficial to wildlife and complement the existing habitat. Habitat features should be incorporated on-site to support existing species of wildlife and provide opportunities for new wildlife.
- F. All developments, including refurbishment works, must carry out ecological surveys and assessments wherever the proposed development is likely to have a significant biodiversity impact, particularly where this involves protected species, SINC's (either within or in close proximity to), and/or habitats or priority species identified in the borough's Biodiversity Action Plan.
- G. All developments are required to minimise impacts on existing trees, hedges, shrubs and other significant vegetation, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development. The council will refuse permission or consent for the removal of protected trees (TPO trees and trees within a conservation area) and for proposals that would have a detrimental impact on the health of protected trees.
- H. Any loss of or damage to trees or other significant planting, or adverse effects on their growing conditions or survival, will only be permitted where it is demonstrably unavoidable in order to meet other relevant Local Plan policy requirements (as

agreed with the council). In such circumstances, suitable high quality re-provision of equal value should be provided on-site. Where on-site re-provision is demonstrably not possible (as agreed with the council), a financial contribution of the full cost of appropriate re-provision will be required.

- 5.22 Biodiversity describes the abundance and variety of life on earth; including animals, birds, trees, plants, insects and fungi. Biodiversity is concerned with the interactions within and between species and the communities, habitats and ecosystems in which they occur.
- 5.23 The protection and enhancement of biodiversity in densely developed urban areas, such as Islington, is very important, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature within the borough. Changes to the built environment can have a significant effect on biodiversity, including protected species, and the ability of people to experience and enjoy nature. Biodiversity and access to nature have a positive influence on physical and mental health, as well as social and community well-being, by providing opportunities for relaxation, exercise, social interaction, outdoor recreation and education. Providing opportunities for people to get involved in looking after natural green spaces also helps to protect and enhance biodiversity for the future. Connectivity between habitats is an important part of biodiversity value and refers to wildlife corridors, such as those provided by railway sidings, connected rear gardens, and the Regent's Canal and New River.
- 5.24 Parts of Islington are deficient in access to nature, meaning individuals living further than 1km walking distance from a designated Site of Importance to Nature Conservation (SINC). The designation of SINC takes into account a number of factors, including size, use, access, habitat and species representation, richness and rarity, as well as the ability to be recreated. Sites of Metropolitan Importance contain the best examples of London's habitats, including particularly rare species, while sites of Borough Grade 1 Importance are of particular significance at the borough level, with some having a high social value for local communities; Metropolitan and Borough Grade 1 sites therefore have the strongest protection. Sites of Borough Grade 2 and Local Importance are of ecological value, and also of value to local communities, and are therefore afforded strong protection.
- 5.25 Designated SINC are identified on the Policies Map. For reference, Figure 5.2 also shows the location of these spaces<sup>19</sup>:

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<sup>19</sup> The council is currently undertaking a study to inform SINC boundaries in the Local Plan Review, including potential new SINC. The SINC boundaries shown on Figure 5.2 are those currently designated; these may be subject to change depending on the outcome of the study.



- 5.26 Proposals on sites of significant biodiversity value will only be considered in wholly exceptional circumstances where high quality re-provision will be required, including at least equal habitat area and value and where other relevant Local Plan policies on Green Infrastructure and design of open space are met. Preservation of existing biodiversity, including wildlife habitats, is strongly preferred over re-provision as any redevelopment of an existing space will necessitate its total loss and replacement with a space that has to be established with plants and wildlife and carries the risks that the replacement space will be less successful than that which it replaces. Re-provision is only likely to be acceptable where measures are secured to ensure that the quality of re-provision at least reaches the quality of the previous space.
- 5.27 Islington's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow, peregrine falcon and black redstart, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many of species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan, and in many cases, will include micro habitat creation. Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats.
- 5.28 Ecological site surveys and assessments will be required wherever the proposed development is likely to have a significant biodiversity impact, particularly where this involves protected species, SINC's and/or habitats or species identified in the borough's Biodiversity Action Plan. This includes refurbishment works which may impact species using the existing building, such as swifts or bats. Ecological surveys must identify potential development impacts likely to harm the ecology of the site and recommend mitigation and enhancement measures. Where a survey is required, this should occur early in the design process of a proposal, undertaken by an appropriately qualified ecologist. Further details of the requirements for ecological surveys and assessments is set out in the Environmental Design SPD.
- 5.29 The achievement of ecological credits under the relevant BREEAM scheme will assist non-residential developments to meet the requirements of this policy.
- 5.30 Landscape design is integral to the design and functioning of the whole development and the wider area and is not something that can be considered after a building has been designed or built. Landscape and buildings need to be considered together from the start of the design process, and therefore a Landscape Design Strategy should be submitted as part of the planning application, including for outline planning applications. The Landscape Design Strategy should include an assessment of existing biodiversity on site (supplemented by more detailed surveys where required), followed by investigation of the potential to enhance biodiversity value and soft landscaping within the development site, as an integral part of the design of a development.
- 5.31 Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions are required to submit a Landscape Design

Strategy. Large extensions will generally be those of 100 square metres and over, but could be smaller dependent on the site context. The level of detail provided in the Landscape Design Strategy should be proportionate to the scale of proposed development and allow the council to fully assess the proposals against relevant planning policies. Further details regarding Landscape Design Strategies are outlined in the Environmental Design SPD.

- 5.32 The incorporation of SUDS based bodies of water, such as rain gardens and ponds, should seek to maximise biodiversity benefits. SUDS based water features may also provide amenity and recreation benefits; however, it must be demonstrated that these functions will not undermine the overall biodiversity value of the site, and that biodiversity benefits can be provided elsewhere on the site. SUDS should also be used in the landscape to maximise water efficiency where practical, through the incorporation of water butts for the irrigation of soft landscaping and rainwater recycling systems. Biodiversity and amenity benefits of SUDS solutions can be maximised by using water in the environment and incorporating attractive and safe SUDS features, such as small ponds and rain gardens, which make use of clean water at the surface to enhance landscape design, create a sense of place and create ecological habitats. The landscape design can also incorporate rainwater harvesting for irrigation of soft landscaping. Designing-in rainwater reuse opportunities reduces demand for fresh mains water for external use. Policy S9 provides more detail on SUDS. Further guidance is also set out in the Environmental Design SPD.
- 5.33 Trees, hedges, shrubs and other significant vegetation are of particular value in Islington due to the borough's dense urban nature, limited amount of green space, and the impacts on air quality from traffic congestion (by absorbing pollutant gases). Vegetation not only provides visual and amenity enhancement to the built environment, but also provides habitats for birds and invertebrates. Trees help to reduce an area's contribution to climate change by capturing and storing carbon dioxide through 'carbon sequestration'. Trees and other types of vegetation are a vital part of adapting to climate change through the provision of urban cooling, which is important due to projected future temperature increases as a result of climate change and the 'heat island effect' which cause temperatures in dense urban areas to be warmer than the surrounding areas. Green spaces and trees also have a positive impact on reducing flood risk, which is important in the context of the projected increase in intense rain showers due to climate change.
- 5.34 Developments are required to minimise any impacts on trees, hedges, shrubs and other significant vegetation, including through the provision of sufficient space for the crowns and root systems of existing and proposed trees and their future growth. This will include assessment of appropriate rooting volumes and the use of modular rooting systems where appropriate. Effective planting design of trees, shrubs and other significant vegetation, including appropriate choice of species, the manner of their planting and subsequent maintenance, is required in order to ensure high nature conservation value, long life and maximum impact; this includes areas of unconstrained planting where planting is not constrained by any structures beneath it, and which is directly connected to the soil profile/sub strata below. Developments are required to provide adequate and appropriate building foundations, which are a prerequisite for retaining trees and allowing for supplementary planting. The proposed foundation depths of new structures will therefore not be an acceptable reason for curtailing planting. Where soil volumes are provided they should be sufficient for the trees to attain their canopy potential. Tree planting on the roof of new buildings is also encouraged, where feasible.



- 5.35 Planting should be beneficial to wildlife and complement the existing habitat. Native species and local provenance species should be planted, where appropriate, and non-native plants may be suitable in some locations providing they have biodiversity value, for example plants for pollinators. Planting must be robust in order to withstand variation in climatic conditions, and sustain itself during climate fluctuations. Planting that is reliant on long term (after initial plant establishment i.e. first two years) watering, particularly during long dry periods is not considered robust or sustainable.
- 5.36 The impact of developments on trees will be assessed in accordance with the council's tree policy and strategy, and to all other statutory provisions and material considerations.
- 5.37 Development proposals which are likely to affect trees within the application site or on land adjacent to the site (including street trees) are required to follow the process outlined in BS5837:2012 and include an up-to-date Arboricultural Impact Assessment (AIA), which shall include a Tree Constraints Plan and Tree Survey. If the impacts identified require tree protection or identify special working methods within the root protection area of retained trees, an Arboricultural Method Statement (AMS) and tree protection plan (to BS5837:2012) will also be required.
- 5.38 In wholly exceptional circumstances, where protected trees are proposed to be removed, or where their health would be detrimentally affected, suitable re-provision will require prompt replacement and/or additional planting to re-provide at least equal canopy cover and/or equal environmental amenity and townscape, biodiversity and urban cooling benefit. Where on-site re-provision cannot be provided, a financial contribution of the full cost of appropriate re-provision will be required. Further guidance on tree planting and retention is set out in the council's Streetbook SPD.
- 5.39 Pruning of retained trees and shrubs on proposed development sites may be required, to facilitate the erection of scaffolding and protective hoardings. Where proposed pruning is satisfactory, this will be conditioned and agreed by specification prior to the commencement of any construction or site preparation works.

## **Policy G5: Green roofs and vertical greening**

- A. Developments proposals must use all available roof space to incorporate biodiversity-based extensive green roofs, subject to other planning considerations. Developments involving the extension of existing buildings should seek to retrofit extensive green roofs on existing roof areas where feasible, in addition to providing green roofs on the extension.
- B. Green roofs should be designed to:
- (i) maximise benefits for biodiversity, sustainable drainage and cooling;
  - (ii) promote ecological diversity including planting based on wildflowers and no more than a maximum of 25% sedum planting;
  - (iii) accommodate surface water storage, where sustainable drainage requirements are applicable, through additional drainage layers and/or by combining with a 'blue roof';

(iv) have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible.

- C. Developments proposing the installation of roof level solar panels are required to incorporate the panels over a green roof area to form a 'bio-solar roof', where the overarching biodiversity and drainage functions of the green roof will not be adversely affected.
- D. All green roof installations should be extensive green roofs. The installation of intensive or semi-intensive green roofs to provide amenity space will only be acceptable where it is clearly demonstrated that this is required to meet other policy requirements, and where the primary biodiversity, sustainable drainage and cooling functions of the green roof will not be adversely affected. Dedicated areas of biodiversity-based planting must be maximised and the amenity space must not cover the majority of roof space.
- E. Major developments are encouraged to consider tree planting and food growing opportunities as part of intensive and semi-intensive green roofs where feasible, and where the additional weight requirements can be supported.
- F. New-build developments, and all major applications (including those involving refurbishments) should maximise the greening of vertical surfaces as far as reasonably possible. Vertical greening should be designed to:
  - (i) maximise benefits for biodiversity, sustainable drainage and cooling;
  - (ii) avoid excessive water demand and employ a watering system that does not rely on mains water supply, including utilising rainfall runoff;
  - (iii) promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan, including nesting boxes for birds or bats where possible;
  - (iv) provide growing conditions suitable for the selected species, and require minimal maintenance;
  - (v) Incorporate planting from both ground level and roof level planters where practical.
- G. The design of green walls must include consideration of building structure and character, including architectural and historic features, in order to ensure such features are preserved and damage is avoided.

5.40 Urban greening - through green roofs and vertical greening - is particularly important on constrained sites where there is limited space for other forms of green space. Green roofs and green walls provide an opportunity for enhancing biodiversity and creating different types of new habitats in the built environment, supporting a wide range of species. These features form an important part of green infrastructure and play a useful role in connecting existing areas of habitat and supporting rare and protected species, as well as providing a broad range of other sustainability benefits. Designers are encouraged to consult a suitably qualified ecologist for advice on the planting and growing conditions of green roofs and green walls. This will also assist developments in achieving credits related to ecology in the relevant BREEAM schemes, where applicable.

- 5.41 Green roofs are vegetated layers that sit on top of the conventional roof surfaces of a building. Green roofs cannot be considered as a direct replacement for green space lost to development as they will tend to have more limited biodiversity potential due to their raised location and limited depth of growing medium, however they do have multiple benefits. They improve biodiversity by supporting a wide range of plant life and providing alternative ecological habitats for insects, bats and birds. Green roofs also contribute to minimising flood risk by reducing surface water runoff, improve air quality, improve thermal efficiency and cooling of buildings through the insulation they provide, and provide urban cooling to mitigate the 'heat island effect'.
- 5.42 'Extensive' green roofs are able to establish a self-sustaining plant community, and are suitable for installation on the majority of building types because they have low management requirements and do not usually require artificial irrigation. Extensive green roofs designed for biodiversity should include a varied substrate depth and be planted and seeded with a wide range of wildflowers. These features will provide good habitat for wildlife including native invertebrate species, nesting and foraging for a number of bird species, and pollinators such as bees. Extensive green roofs must not be publicly accessible, except for necessary maintenance, in order to ensure the biodiversity of the roof can thrive. Development proposals should prioritise biodiversity-based extensive green roofs in favour of intensive and semi-intensive green roofs, unless it can be demonstrated that an intensive or semi-intensive green roof is necessary to meet policy requirements relating to the provision of private open space. Clear and convincing evidence must be provided to demonstrate that provision of alternative on-site amenity space is not possible in order to justify why an extensive roof cannot be installed.
- 5.43 'Intensive' and 'semi-intensive' green roofs provide different degrees of accessible amenity space such as rooftop gardens and food growing areas and require higher levels of design and maintenance. These types of roofs must be installed upon a stronger structure in order to support the additional weight requirements of deeper soils or substrate and features such as paths. As a result, they can also support a greater diversity of planting and richer ecology including shrubs and tree planting, in addition to wildflowers found on extensive green roofs. Intensive green roofs can provide very effective sustainable drainage as they can support the weight requirements of blue roof storage, which can also be used to irrigate the planting and trees.
- 5.44 The incorporation of biodiversity-based extensive green roofs on all available roof space should be provided as part of all new-build developments, major refurbishments, and extensions larger than 100sqm. All other developments should investigate the potential for incorporating a green roof. Where it is demonstrated that the incorporation of a green roof is not feasible or practical, it must be demonstrated that other forms of greening have been investigated and maximised as part of the development, in order to maximise soft landscaping and biodiversity in line with green infrastructure strategic policy. All development proposals are encouraged to incorporate 'green roof' elements and planting on terraces and balconies, subject to other planning considerations.
- 5.45 Due to the densely developed nature of the borough, there may be competing demands on the proposed use of roof spaces, including the provision of biodiverse urban greening, rainwater attenuation, renewable energy generation through solar panels, and amenity space. High quality design should aim to resolve any potential conflicts between creating green roofs, providing renewable energy and supplying amenity space on roofs. Dual uses on roofs will be encouraged where they will not

have a negative impact on the primary functions of the green roof to provide biodiversity, sustainable drainage and cooling benefits.

- 5.46 The installation of 'Bio-solar' roofs will be encouraged which incorporate solar panels over the green roof area. Combining solar panels with green roofs brings together the benefits of an extensive green roof with the energy-generating capability of solar PV arrays and can enhance the biodiversity of the green roof by providing shading and wetter areas as rainwater runoff from the panels sheds water onto the green roof. In addition, the green roofs can also help to regulate the temperature of solar panels, improving their efficiency.
- 5.47 Green/blue roofs can contribute to the requirement for all developments to ensure that surface water run-off is managed as close to its source as possible and to reduce runoff rates, in accordance with Policy S9.
- 5.48 A blue roof is an attenuation tank at roof or podium level which can provide rainwater attenuation and minimise surface water flood risk. The combination of a blue and green roof can be used to provide rainwater harvesting which allows the attenuated water is used to irrigate the green roof as part of an integrated approach to water management on a site. Blue roofs can make up the drainage and support layer on both extensive and intensive green roofs provided the roof has been designed to cope with additional weight (see Policy S9). Developments that incorporate a blue roof must be designed to cope with the additional weight. This provides an opportunity to integrate tree planting alongside the blue roof.
- 5.49 Green walls, also known as living walls, are an integral part of urban greening and provide the possibility of growing plants in locations that would not normally support vegetation. Vertical greening is particularly important where site constraints limit other urban greening possibilities and biodiversity enhancements.
- 5.50 Green walls provide similar benefits as green roofs in terms of biodiversity, air quality, thermal efficiency and cooling, and they can have flood risk alleviation benefits where they are irrigated via rainwater runoff, reducing surface water run-off. In addition, green walls have a visible greening effect which provides an attractive design feature and important visual amenity provision especially in built-up areas with a lack of green space, allowing people to experience biodiversity.
- 5.51 Depending on the particular plant species used, green walls can provide nesting habitat for birds, berries for birds in winter, flowers for pollinators, and important habitats for insects. Green walls can also provide amenity and energy conservation benefits and help to protect walls from rain and sun damage. Species chosen for planting and suitable growing conditions should be informed by Islington's Biodiversity Action Plan.
- 5.52 The incorporation of green walls should include plants that are planted in the ground and climb directly up wall surfaces and trellis to provide vegetation cover, such as Ivy. Green walls should also include planting at roof level which hangs down the building, where practical, and can be incorporated as part of a green roof. Alternatively, green walls can be part of a vertical system incorporating vegetation, growing medium, irrigation and drainage into a single system in which multiple plantings root to a structural support attached to the wall and receive water and nutrients from within the vertical support.
- 5.53 Impacts on building structure and associated maintenance requirements are relevant considerations when determining the scope of a green wall. Green wall design must

include consideration of maintenance requirements in order to ensure that plants receive sufficient water and nutrients from the ground or from within the vertical support, depending on the type of green wall proposed. In order to be a sustainable greening feature, the watering system for the green wall must not rely on mains water supply.

- 5.54 The incorporation of vertical greening is considered to be suitable as part of new-build and major developments across Islington, including in conservation areas and on listed buildings (subject to appropriate permissions). Proposals involving vertical greening should be assessed in line with relevant design and heritage policies; the benefits of vertical greening (where fully compliant with Part F of this policy) are likely to attract significant weight in such assessments. In order to ensure that architectural and historic features are preserved and damage to buildings is avoided, special consideration should be given to the weight of the green wall and the impact it may have on the structural fabric and material of the building.

# 6 Sustainable Design

## Policy S1: Delivering Sustainable Design

- A. The council will seek to ensure the borough develops in a way that maximises positive effects on the environment and improves quality of life, whilst minimising or avoiding negative impacts. Ensuring sustainable design will reduce fuel poverty, and improve long term energy security for Islington residents and businesses; minimise the contribution of development in Islington to climate change and ensure that developments are designed to mitigate the effects of climate change, in line with the three strategic objectives of the Committee on Climate Change to reduce energy demand, decarbonise heat and decarbonise electricity.
- B. The council will promote zero carbon development, with the aim that all buildings in Islington will be zero carbon by 2050. To ensure that Islington is on the right trajectory to achieve this target, sustainable design must be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards and policies during design, construction and operation of the development.
- C. All development proposals must maximise energy efficiency and minimise on-site carbon dioxide emissions in accordance with the following energy hierarchy:
- **Be lean:** use less energy and manage demand during construction and operation. Energy demand (both annual and peak) should be minimised as far as possible through consideration of building fabric energy efficiency as an integral part of the design, with a focus on building form and passive design in addition to specification.
  - **Be clean:** supply energy efficiently and cleanly, and utilise local energy resources (such as heat networks and secondary heat).
  - **Be green:** generate, store and use renewable energy on-site. Developments should maximise opportunities for on-site zero carbon electricity and heat production from renewable energy technologies, including solar technologies (photovoltaic and thermal), subject to meeting wider policy requirements in relation to design, green roofs, amenity, and air quality.
  - **Be seen:** monitor, verify and report on energy performance.
- D. Sustainable design must be considered holistically from the start of the design process and all development proposals are required to demonstrate how they will comply with all relevant sustainable design standards and policies during design, construction and operation of the development.
- E. The council will work with partners and local communities to improve the energy efficiency of the existing building stock and wider public realm, with a particular focus

on increasing energy efficiency of homes and businesses. Islington's carbon offset fund will be used to implement projects to reduce carbon emissions from the existing building stock.

- F. The council will promote the extension of existing heat networks and the delivery of new heat network infrastructure as. Heat networks have potential to deliver significant contribute significantly to climate change mitigation measures, through the decarbonisation of heat, minimising fuel poverty, and maximising energy resilience.
- G. All development proposals are required to adopt an integrated approach to water management which considers flood risk, sustainable drainage, water efficiency, water quality and biodiversity. All development proposals will be expected to reduce water demand and meet best practice water efficiency targets.
- H. . The council will promote a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste. A central part of this is ensuring developments are designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.
- I. All new development must be designed, constructed and operated to limit contribution to air pollution and to improve air quality as far as possible, as well as reducing exposure to poor air quality, especially among vulnerable people.

- 6.1 'Carbon' is used in this chapter as a shorthand term for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.
- 6.2 Reducing the environmental impact of development whilst supporting growth is particularly challenging in dense urban locations with high levels of growth, such as Islington. However, growth and change can also provide opportunities to support the development of more sustainable buildings and neighbourhoods that are designed to minimise their contribution to, and mitigate the effects of, climate change, while also improving quality of life.
- 6.3 The Committee on Climate Change has three strategic objectives as part of the overall aim to minimise emissions and reduce the impact of development climate change:
  - Reducing energy demand;
  - Decarbonising heat;
  - Decarbonising electricity.
- 6.4 Requiring developments to maximise energy efficiency and minimise carbon emissions will contribute to achieving these overall objectives, and will ensure that the Islington is on the right trajectory to achieve its target for all buildings in Islington to be zero carbon by 2050. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent. Seeking to achieve these objectives will not only reduce the contribution of development to climate change, but will also contribute to reducing fuel poverty and enhancing energy resilience.

- 6.5 The use of low or zero carbon energy, such as heat networks and renewable energy, will be required to enable the decarbonisation of heat and electricity. These forms of energy will strengthen Islington's energy resilience by enabling developments to benefit from local low carbon energy sources. The extension of existing heat networks and the delivery of new heat network infrastructure will also help minimise fuel poverty by reducing energy bills for local residents, including the most vulnerable residents. A strategic masterplan vision for potential heat networks in Islington has been developed as part of a multi-phase project, which included borough wide energy mapping, carried out by Buro Happold. Islington's strategic vision for heat networks is to develop the initial clusters and form interlinks within the borough and to adjacent boroughs<sup>20</sup>.
- 6.6 Initially, proven low carbon CHP technology using natural gas will be used to start the networks, with planned future transition to cost-effective secondary sources, including low-grade waste heat. The energy mapping undertaken by Buro Happold suggests that there are a number of sources of low grade heat in the Borough, including London Underground ventilation, data centre(s) and substations. Identifying and capturing such sources of low carbon heat will be key to moving beyond natural gas CHP in the future when heating systems will be required to specify a lower annual carbon content of heat, and natural gas CHP will no longer be a low carbon option.
- 6.7 Minimising the effects of climate change on people and the environment is a fundamental consideration in sustainable design. Increasing temperatures bring increased risk of overheating within buildings and at a more macro scale through the urban heat island effect. Increases in the frequency and intensity of heavy rainfall bring increased risk of surface water flooding. Climate change is a particular concern in the context of ongoing development and intensification of the built environment. In response, developments must be designed and constructed in ways that mitigate the effects of climate change. Design should address overheating and the effects of the urban heat island through measures such as the orientation of buildings and use of solar shading to minimise solar gain; the use of natural ventilation; and the incorporation of green infrastructure to provide urban cooling. Flood risk should be managed and mitigated through the incorporation of Sustainable Urban Drainage Systems (SUDS) and utilising flood proof design.
- 6.8 An integrated approach to water management will encourage water to be considered holistically across a site, and in the context of links with wider-than-site level plans. A reduction in mains water demand will be achieved through requiring compliance with water efficiency targets such as BREEAM and the national targets set in Building Regulations.
- 6.9 A circular economy approach is one where materials are retained in use at their highest value for as long as possible, and are then re-used or recycled, leaving a minimum of residual waste. This approach aims to minimise wider environmental impacts of materials and construction processes. Buildings should be designed to be adaptable, flexible and able to respond to change in order to extend a building's useful life, ensure resource efficiency and avoid unnecessary demolition. Buildings must be made from sustainably-sourced, low impact components and materials that can be reused or recycled, and building design must enable deconstruction in order to ensure the maximum value of building components can be recovered at the end of the building's life.

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<sup>20</sup>The development of proposed future networks is not guaranteed and they are subject to change.



## Policy S2: Sustainable Design and Construction

- A. All development proposals are required to submit a Sustainable Design and Construction Statement. The Statement must demonstrate that the proposal meets all relevant sustainable design policies, demonstrating that sustainable design has been considered holistically from the start of the design process and is integrated throughout the construction and operation of the development.
- B. The Sustainable Design and Construction Statement submitted by all major developments, minor new build developments, and larger minor extensions must include the following details:
- (i) Energy Strategy - demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and justify the heat source selection in accordance with the heating hierarchy. For detailed requirements see Policy S4: Minimising greenhouse gas emissions; and Policy S5: Energy Infrastructure.
  - (ii) Adaptive Design Strategy – demonstrate how the application addresses circular economy principles, including the impact and efficiency of construction materials, and how the development has been designed to adapt to change. For detailed requirements see Policy S10: Circular Economy and Adaptive Design.
  - (iii) Landscape Design Strategy – demonstrate an integrated approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage, including the incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design. For detailed requirements see Policy G4: Biodiversity, landscape design and trees.
  - (iv) Integrated Water Management and Sustainable Drainage – demonstrate an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically. Major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet the drainage requirements. For detailed requirements see Policy S9: Integrated Water Management and Sustainable Drainage.
  - (v) Operational sustainability – demonstrate how the development will be designed to facilitate ongoing effective and sustainable use, management and maintenance. For detailed requirements see Policy S4 Minimising greenhouse gas emissions and Policy S6: Managing Heat Risk.
  - (vi) Air Quality - demonstrate how the development will be designed, constructed and operated to limit their contribution to air pollution, improve local air quality, and reduce exposure to poor air quality, especially vulnerable people. For detailed requirements see policy S7: Improving air quality.
- C. The Sustainable Design and Construction Statement submitted by smaller minor extensions and minor changes of use should demonstrate that all relevant sustainable design requirements have been considered. The level of information provided in the statement should be proportionate to the requirements.
- D. Developments are required to support monitoring of the implementation of the Sustainable Design and Construction Statement, including the Green Performance Plan and other submitted sustainable design details, by:

- (i) allowing council officers access to the development;
- (ii) submitting information to the council when requested; and
- (iii) where necessary, through payment of a reasonable monitoring fee set by the council.

6.10 All developments must submit a Sustainable Design and Construction Statement (SDCS), including developments involving the creation of new buildings; refurbishment and redevelopment of existing buildings; changes of use; and extensions (including basements, roof extensions, and loft conversions). Developments involving extensions to existing buildings should consider the sustainable design implications in relation to the building as a whole, in addition to the extension. 'Larger extensions' referred to in Part C of this policy include extensions of 100 square metres and over.

6.11 Guidance and minimum information requirements for each section of the SDCS, depending on the application type are set out in the Environmental Design SPD. The level of detail provided should be proportionate to the scale of proposed development and allow the council to fully assess the proposals against relevant planning policies. Early engagement with the council through pre-application advice is encouraged, to discuss and agree the scope of the SDCS and the required level of detail.

6.12 Minor extensions smaller than 100 square metres and minor changes of use may not need to provide the detailed information set out in Part C of this policy. Such smaller-scale applications should provide an SDCS with information proportionate to the scale of sustainable design requirements required by Local Plan policies. These types of development are likely to have less significant sustainable design implications, especially as they are required to meet minimum energy efficiency requirements under the Building Regulations. All developments should be designed and managed to promote ongoing operational sustainability. A development will only perform to its full potential in use if it is effectively operated and maintained, and is flexible enough to meet changing user demands over time. A building and its systems should be designed to facilitate effective use, management (including performance monitoring), maintenance, and adaptation to changing requirements over a long lifetime. Operational sustainability should also be achieved through raising awareness of environmental issues including the provision of appropriate information, training and support to building/site operators, maintenance personnel and building users in general on how to use, maintain and adapt the building effectively and how to monitor, evaluate and optimise performance in use. Ensuring the operation of the development is adaptable to changing user needs will also help to support sustainable lifestyles.

### **Policy S3: Sustainable Design Standards**

- A. Major and minor residential developments involving refurbishment or extensions are required to achieve a final (post-refurbishment) certified rating of Excellent under BREEAM Domestic Refurbishment 2014 (or equivalent scheme) and should make reasonable endeavours to achieve an Outstanding rating.

- B. Major and minor new-build residential developments are required to achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme.
- C. All non-residential and mixed-use developments proposing 500sqm or more net additional floorspace are required to achieve a final (post-construction stage) certified rating of Excellent as part of a fully fitted assessment within BREEAM New Construction 2018 (or equivalent scheme), and should make reasonable endeavours to achieve an Outstanding rating. A 'verification stage' certification at post occupancy stage should also be achieved, unless it can be demonstrated that this is not feasible.
- D. Major non-residential and mixed-use refurbishment developments are required to achieve a final (post-construction) certified rating of Excellent under BREEAM UK Non-Domestic Refurbishment and Fit-out (or equivalent scheme) and should make reasonable endeavours to achieve an Outstanding rating. The scope of works of the development must include a full fit-out, unless it can be demonstrated that this is not feasible.
- E. All developments assessed under BREEAM New Construction 2018 (as required by Part C) and Non-Domestic Refurbishment and Fit-out schemes (as required by Part D) are required to score the following minimum 'credits', in addition to the minimum acceptable requirements for a BREEAM excellent rating:
- (i) At least 50% of credits on Environmental impacts from construction products (Mat 01);
  - (ii) At least 1 credit on Responsible sourcing of materials (Mat 03), in addition Criterion E(i);
  - (iii) At least 50% of credits on Construction waste management (Wst 01);
  - (iv) All credits on Water consumption (Wat 01), or a minimum of 3 credits where rainwater and/or greywater recycling is demonstrated not to be feasible;
  - (v) The second credit on energy monitoring (Ene 02 – Sub-metering of high energy load and tenancy areas), where feasible.
  - (vi) Reasonable endeavours should be made to achieve two credits under the Ene 01 exemplary level criteria, in order to demonstrate zero carbon development; and
  - (vii) BREEAM New Construction only - all 4 credits for Energy modelling and reporting as part of Reduction of energy use and carbon emissions (Ene 01).
- F. All developments assessed under BREEAM Domestic Refurbishment 2014 (as required by Part A) are required to score the following credits, in addition to the minimum acceptable requirements for a BREEAM excellent rating:
- (i) At least 50% of credits on Environmental impact of materials (Mat 01);
  - (ii) At least 50% of credits on Responsible sourcing of materials (Mat 02); and
  - (iii) All credits on Refurbishment site waste management (Was 2).
- G. All minor non-residential new build developments and minor non-residential extensions of 100sqm or greater are required to demonstrate how all credits for water consumption (Wat 01) would be achieved under the relevant BREEAM scheme. A minimum of 3 credits must be achieved where rainwater and/or greywater recycling is demonstrated not to be feasible, in order to achieve water credits equivalent to an Excellent standard.

H. A minimum 10% of the total value of materials used in the construction of both major and minor developments should derive from recycled and reused content in the products and materials selected.

- 6.13 All developments should achieve the highest feasible level of the relevant sustainable design standard in order to ensure high standards of sustainable design and contribute to the council's overarching sustainability objectives. The council will assess development proposals by using the Building Research Establishment Environmental Assessment Methodology (BREEAM)<sup>21</sup>. BREEAM is a sustainability assessment and certification scheme for the built environment and provides a widely recognised and well understood framework for the promotion of sustainable design. It allows for the assessment and rating of the environmental life cycle impacts arising from different types of developments, including energy, pollution, water, materials, health and wellbeing, and waste. Compliance with BREEAM will help to mitigate the life cycle impacts of new and existing buildings on the environment and allow developers to demonstrate to the council that development is truly sustainable.
- 6.14 Residential proposals were formerly required to achieve certification under the Code for Sustainable Homes (CSH) assessment method, which has now been withdrawn. Residential developments may still carry out a voluntary assessment using the CSH in order to ensure high sustainable design standards. Should new national sustainable housing standards be introduced in the future which would lead to better, more effective implementation of sustainable design objectives, Islington's policies will be interpreted in relation to these standards and guidance will be provided in the Environmental Design SPD. In order to ensure residential development continues to meet high sustainable design standards, this policy requires the achievement of alternative standards to the Code for Sustainable Homes.
- 6.15 BREEAM Domestic Refurbishment 2014 (covered by Part A of this policy) applies to alterations to existing dwellings, including domestic conversions, change of use projects and extensions; it allows both the extension and the existing dwelling to be included as part of the assessment. A post-refurbishment stage assessment or review is required in order to confirm the final 'as refurbished' performance of the building; this should be certified after practical completion of the refurbishment works.
- 6.16 The BREEAM Domestic Refurbishment scheme does not apply to new-build developments. The Fabric Energy Efficiency Standard (FEES) will be applied to new-build residential developments in order to reduce carbon emissions through fabric energy efficiency, as set out in Policy S4: Minimising greenhouse gas emissions.
- 6.17 The Building Research Establishment (BRE) Home Quality Mark (covered by Part B of this policy) has been designed to ensure the construction of high quality sustainable homes that will meet the long-term needs of occupants. This scheme allows the sustainability credentials of new homes to be compared more easily, and, where adhered to alongside FEES requirements, will help developers to demonstrate compliance with the relevant policies.

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<sup>21</sup> The Local Plan details requirements based on the current BREEAM standards. Any updates published during the plan period would apply. The Council may provide guidance on any relevant BREEAM updates through supplementary guidance.

6.18 Table 6.1 identifies the different sustainable design requirements for residential developments.

**Table 6.1: Sustainable Design Standards for residential developments**

Sustainable Design Standard	Major resi new-build	Minor resi new-build	Major resi refurb	Minor resi refurb
Fabric Energy Efficiency Standard (FEES) <sup>22</sup>	✓	✓	✗	✗
BRE Home Quality Mark	✓	✓	✗	✗
BREEAM Domestic Refurbishment	✗	✗	✓	✓

6.19 The BREEAM New Construction 2018 scheme (covered by Part C of this policy) can be used to assess the environmental life cycle impacts of new non-residential buildings at the design and construction stages. ‘New construction’ is defined as development that results in a new standalone structure, or a new-build extension to an existing structure. A threshold of 500sqm has been applied to ensure that larger minor developments achieve this requirement.

6.20 A fully fitted assessment will ensure that the fit out of the development meets the sustainable design policy requirements, including those relating to energy efficiency, water efficiency, and sustainable materials. Fully fitted developments assessed under BREEAM New Construction 2018 should achieve a ‘verification stage’ certification at post occupancy stage, unless it can be demonstrated that this is not feasible. The New Build Verification Stage incentivises project teams to close the gap between the design intent and actual in-use performance of buildings, and can be used to inform the Green Performance Plan as part of the requirements set out in Policy S4.

6.21 Where it can be demonstrated to the council’s satisfaction that the end occupier of the development has exceptional requirements which necessitate a shell only or shell and core fit out, a BREEAM New Construction 2018 shell only or as shell and core assessment should be undertaken; and the BREEAM Non-domestic Refurbishment and Fit-out scheme should be used to assess the subsequent fit-out of the building, to upgrade the project to a BREEAM New Construction fully fitted rating and certification. This enables speculative shell only and shell and core projects to achieve fully fitted status once the occupiers are known, even though the construction works and finishing stages will be carried out separately. In these cases, the requirement to fully fitted status will be secured via legal agreement or planning condition, as appropriate.

6.22 The BREEAM UK Non-Domestic Refurbishment and Fit-out scheme (covered by Part D of this policy) assesses the environmental life cycle impacts of existing non-domestic buildings at the refurbishment and fit-out stages. The scope of works being assessed must include a full fit-out unless it can be demonstrated to the council’s satisfaction

<sup>22</sup> FEES requirements are set out in policy S4.

that the end occupier of the development has particular requirements which necessitate a shell only or shell and core building. As with schemes covered by Part C (and detailed in paragraph 6.21 above) the subsequent fit-out of the building should upgrade the project to a BREEAM New Construction fully fitted rating and certification; this will be secured via legal agreement or planning condition, as appropriate.

6.23 Table 6.2 identifies the different sustainable design requirements for non-residential developments.

**Table 6.2: Sustainable Design Standards for non-residential developments**

Sustainable Design Standard	Non-resi new-build over 500sqm	Mixed use new-build over 500sqm	Major non-resi refurb	Major mixed use refurb
BREEAM New Construction 2018	✓	✓	✗	✗
BREEAM UK Non-Domestic Refurbishment and Fit-out	✗	✗	✓	✓

6.24 Achieving the specified credits in Parts E and F of this policy will ensure high standards of sustainable design are adopted and will enable delivery of other Local Plan sustainability objectives. Developments assessed under BREEAM New Construction 2018 and BREEAM UK Non-Domestic Refurbishment and Fit-out must take a robust approach to minimising the environmental impacts of material use. Compliance with criterion 1 under Responsible sourcing of materials (Mat 03) is a minimum requirement as part of these BREEAM assessments. Criterion 1 specifies that all timber and timber-based products used on the project are legally harvested and traded timber as per the UK government's Timber Procurement Policy (TPP).

6.25 All major developments assessed under BREEAM should make reasonable endeavours to achieve an Outstanding rating in accordance with this policy. In order to demonstrate that reasonable endeavours have been made, applicants must provide detail which additional BREEAM credits have been targeted as part of Sustainable Design and Construction Statement. Particular efforts should be made to achieve an Outstanding rating in relation to energy performance and modelling. If the Outstanding rating is deemed not to be feasible, details must be provided to justify this. Schemes which do not adequately demonstrate this may be refused. Should the relevant BREEAM scheme be replaced or amended during the lifetime of the plan the equivalent replacement requirements will be applied by the council.

6.26 While minor developments are not required to achieve a formal BREEAM certification, Part G requires minor non-residential developments to demonstrate how BREEAM credits in relation to water consumption would be achieved. Further details of water efficiency standards are set out in Policy S9: Integrated Water Management and Sustainable Drainage.

## Policy S4: Minimising greenhouse gas emissions

- A. All development proposals are required to demonstrate how carbon emissions will be reduced in accordance with the energy hierarchy as part of the Sustainable Design and Construction Statement (SDCS). Major developments, minor new build developments, and larger minor extensions must provide a more detailed energy assessment through an Energy Strategy.
- B. Until the end of 2021, major residential developments and minor new-build residential developments of one unit or more are required to comply with the interim' Fabric Energy Efficiency Standard (FEES), as defined by the Zero Carbon Hub. 'Full' FEES will apply from the start of 2022 onwards.
- C. All major developments and minor new-build residential developments of one unit or more should be net zero-carbon. These developments must demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy, and must monitor and report on energy performance.
- D. In order to meet the zero-carbon target, the following on-site reductions in carbon emissions should be achieved in accordance with the energy hierarchy:
- (i) Major developments should achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 27 per cent beyond Building Regulations standards.
  - (ii) Major developments able to connect to an existing heat network should achieve a minimum on-site reduction in total (regulated and unregulated) emissions of at least 39 per cent beyond Building Regulations standards.
  - (iii) Minor new-build residential developments of one unit or more should achieve a minimum on-site reduction in regulated emissions of at least 19% beyond Building Regulations standards, unless it can be demonstrated that such provision is not feasible.
- E. All developments are required to reduce emissions through FEES in the first instance, then through other energy efficiency measures, followed by other mechanisms such as provision of on-site renewables. Major developments are required to achieve the following reductions in demand as part of achieving the overall reduction targets in Part D of this policy:
- (i) Major non-residential development should aim to achieve at least 15 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.
  - (ii) Major residential development should aim to achieve at least 10 per cent out of the overall reduction target through energy efficiency measures in order to reduce energy demand.
- F. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the Islington's carbon offset fund. All major developments and minor new build developments of one unit or more will be required to pay the full cost of offsetting the remaining regulated emissions, unless it can be demonstrated that this is not viable,

in which case the maximum payment for offsetting will be required based on a viability assessment. Such payments will be secured through a legal agreement.

- G. Proposals for householder extensions should contribute to reducing emissions from the whole building as far as possible. The Energy Strategy must demonstrate that cost-effective energy efficiency measures have been applied to the existing property, where practical, in addition to requirements applicable to the extension itself.
- H. Major developments must submit a Green Performance Plan (GPP) detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions, based on the commitments in the Energy Strategy.
- I. The Energy Strategy, and where appropriate, Green Performance Plan, should include the following information in order to maximise fabric energy efficiency, reduce the performance gap and provide more accurate information to design teams:
  - (i) An assessment of predicted future energy use based on PHPP for residential and low energy non-domestic buildings; and CIBSE TM54 for non-domestic buildings (or any equivalent methodology), rather than Part L only assessments. Predicted energy use should be declared in kWh/m<sup>2</sup>/yr and kWh/yr and this would become one of the GPP indicator targets.
  - (ii) Confirm the actual performance values achieved in comparison to the original energy targets stated in the Energy Strategy, and to submit the associated evidence including site photographs of insulation installation and the construction manager's declaration. This information should be submitted to the Council prior to occupancy as part of the final GPP,.
  - (iii) Carry out an air tightness test and thermographic survey for all new and refurbished buildings over 500sqm. The test reports, along with details of any remediation measures, should be provided to the Council prior to occupancy as part of the final GPP.

6.27 This policy seeks to minimise Islington's contribution to climate change, reduce fuel poverty and improve long term energy resilience.

6.28 The energy hierarchy should inform the design, construction and operation of new buildings. Major developments, minor new build developments, and larger minor extensions must provide a more detailed energy assessment through an Energy Strategy which should contain the information set out in London Plan Policy SI2: Minimising greenhouse gas emissions, including measures to reduce carbon emissions beyond Part L of the Building Regulations,

6.29 In Islington, this should be achieved by minimising energy demand through fabric energy efficiency measures as far as possible in the first instance, before seeking to address how low carbon energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.

6.30 The fabric energy efficiency of a building is not only the result of the thickness of insulation but also of the area of external envelope and its complexity, particularly in terms of thermal bridges, increased heat loss areas, and window proportions. As building form has a direct influence on energy efficiency, energy demand should be



minimised by improving fabric energy efficiency with a focus on building form as well as specification.

- 6.31 The future adoption of recognised and successful fabric first approaches such as Passivhaus and AECB Silver standards will be encouraged in order to promote best practice fabric energy efficiency. Further details of best practice fabric energy efficiency standards are provided in the Environmental Design SPD.
- 6.32 Part B of this policy requires all relevant residential developments to comply with the Fabric Energy Efficiency Standard (FEES), which is available as part of the Government’s Standard Assessment Procedure (SAP), used to assess and compare the energy and environmental performance of dwellings. The FEES has been developed by the Zero Carbon Hub to ensure that zero carbon homes prioritise a holistic approach to energy efficiency that assesses both specification and form components under one metric. While Building Regulations Part L helps to assess and value better specifications, it does not allow assessment of efforts to design and build more efficient building forms. In contrast, the FEES offers greater flexibility in the ways energy efficiency can be achieved, providing a more effective tool for valuing and quantifying efforts made to design a more energy efficient building form, alongside increases in energy efficient specifications. The FEES will encourage future best practice by ensuring the design of more energy efficient residential buildings that do not rely too heavily on on-site low carbon energy sources and off-site carbon offsetting to reduce emissions.
- 6.33 The FEES targets are the proposed maximum space heating and cooling energy demand for zero carbon homes that would normally be needed to maintain comfortable internal temperatures. The Zero Carbon Hub has recommended that the metric used to measure this should be kWh/m<sup>2</sup>/yr, and that the targets are based on two types of residential development and two FEES levels. Up to the end of 2021, this policy requires compliance with the ‘interim’ FEES levels set out in table 6.3 below. From the start of 2022 onwards, the FEES requirement will be increased to ‘full’ FEES.

**Table 6.3: FEES requirements**

Type of residential development	Interim FEES (2020-2021)	Full FEES (from 2022)
<b>Mid-terrace houses and blocks of flats</b>	< 43 kWh/m <sup>2</sup> /yr	< 39 kWh/m <sup>2</sup> /yr
<b>Semi-detached, end of terrace and detached houses</b>	< 52 kWh/m <sup>2</sup> /yr	< 46 kWh/m <sup>2</sup> /yr

- 6.34 Energy modelling carried out as part of the London Borough of Islington Energy Evidence Base concluded that compliance with the ‘interim’ FEES, and future transition to ‘full’ FEES, will discourage poorly efficient buildings (i.e. those proposing an inefficient form alongside inefficient specifications) while still allowing a wide range of residential developments typologies to be developed. The FEES have the potential to assist scheme viability because designers will be able to achieve greater energy efficiency by improving building form, in addition to specification, which is likely to be

cost neutral or potentially cost positive. Compliance with the FEES levels recommended by the Zero Carbon Hub not only supports carbon reduction, but also long term energy security and the reduction of fuel poverty for future residents. The FEES does not apply to residential developments involving refurbishment and extension; however, these developments are encouraged to maximise energy efficiency through a focus on building form (e.g. for a proposed new extension) in addition to specification, in accordance with the FEES.

- 6.35 The policy sets FEES levels which need to be met, but there are best practice examples of fabric energy efficiency – such as Passivhaus - which go beyond the policy levels, which all developments are encouraged to follow. Further detail is set out in the Environmental Design SPD.
- 6.36 In accordance with the energy hierarchy, after reducing emissions as far as possible through energy efficiency, all developments should seek to supply energy efficiently and cleanly and incorporate renewable energy. The local generation of zero carbon electricity through renewable energy will supplement grid decarbonisation at the national and international level, as well as promoting energy resilience and alleviating fuel poverty by reducing energy costs to occupants. Solar photovoltaic technology provides a reliable source of clean renewable electricity which is generated at or near the point of use and is increasingly cost competitive with grid electricity. All developments are encouraged to utilise roof spaces more effectively for the installation of photovoltaic panels (PVs), where feasible and practical, taking into account other policy requirements relating to roof spaces, particularly the provision of green roofs. Other on-site opportunities for PVs should also be considered and the use of innovative building materials and smart technologies should be maximised.
- 6.37 Compliance with the FEES should be used as the primary mechanism for major residential developments to achieve the on-site emissions reduction target in Part D. While minor new-build residential developments are not required to meet a specific energy efficiency target as part of this policy, compliance with the FEES will ensure that emissions are reduced through energy efficiency measures as far as possible, beyond Building Regulation requirements. All other minor developments are not required to achieve specific carbon reduction targets or energy efficiency targets beyond Building Regulation requirements. Achieving energy credits as part of a Building Research Establishment Environmental Assessment Method (BREEAM) rating will assist major non-residential developments in meeting the energy efficiency target.
- 6.38 While minor developments are unlikely to have significant sustainable design implications on their own, the cumulative impact on energy consumption and carbon emissions is significant. Minor developments including new-build non-residential developments, changes of use, conversions of properties to residential units, and extensions to existing buildings can result in increased carbon emissions due to increased occupancy and, in the case of extensions, increased surface area and heating and lighting demands. The Building Regulations help to ensure, to some degree, that increases in carbon emissions from minor developments are minimised by setting minimum energy efficiency requirements for new-build and existing developments, including material changes of use and extensions. However the current Building Regulations do not require consequential improvements to an existing dwelling when it is extended. Part E of this policy requires householders to apply energy efficiency enhancements to the existing building, in addition to the extension itself, as this represents a cost-effective opportunity to minimise carbon emissions and reduce energy bills. Further information on appropriate energy efficiency measures are set out in the Environmental Design SPD. The design and construction of extensions

to existing dwellings should prioritise fabric energy efficiency measures with a focus on form in addition to specification, based on same principle as the FEES.

- 6.39 Major developments and minor new-build residential developments of one unit or more are expected to achieve zero-carbon targets on-site, rather than relying on offset fund payments to make up any shortfall in emissions. Where the zero-carbon target cannot be fully achieved on-site, all projected residual carbon emissions will be offset through a financial contribution as follows:
- For minor new-build residential developments all remaining regulated emissions will be offset based on a flat fee of £1000 per new flat and £1500 per new house<sup>23</sup>.
  - For all major developments all remaining regulated emissions will be offset based on the nationally recognised non-traded price of £95/tonne. This price has been tested as part of the viability assessment for the London Plan and may be updated through the Environmental Design SPD should the evidence base change.
- 6.40 The remaining carbon emissions to be offset should be clearly stated in the Energy Strategy. The Council will assess each development individually to verify any projected residual carbon dioxide emissions and calculate the financial contribution to offset these emissions. The contributions towards offsetting projected residual carbon emissions will be secured by a legal agreement and are not addressed by the council's CIL charge. The carbon offsetting contribution cannot be funded through CIL under the CIL Regulations 2010 (as amended) because it is not considered to be infrastructure, as defined under the Planning Act 2008.
- 6.41 The Council's Affordable Energy Board is responsible for decisions regarding the allocation of carbon offset payments and this will be assessed on case by case basis. Offset fund payments will be ring-fenced to implement measures and projects that reduce carbon emission from the existing building stock in the borough, such as energy efficiency improvements to social and private housing. The spending of carbon offset payments and the monitoring of carbon savings delivered will be managed by the Council. Further details on the implementation of the offset policy are set out in the Environmental Design SPD.
- 6.42 Major developments are required to submit a Green Performance Plan (GPP) detailing the actual measurable outputs for the occupied building in relation to energy consumption and carbon emissions, based on the commitments in the Energy Strategy. A draft GPP should be provided with the planning application, and where the end occupier is known the plan should be developed jointly with them. A full GPP with updated targets adjusted to reflect new information on occupancy, and full details of monitoring arrangements, should be submitted within six months of occupation. This will ensure that development is able to mitigate and adapt to climate change, consistent with the requirements of the NPPF. The GPP should set out arrangements for monitoring and reporting on the progress of the plan over the first two years of occupancy, and arrangements for the handover of the plan, where the occupier is different to the developer. Further guidance is provided in the Environmental Design SPD.
- 6.43 A key aim of the GPP is to address the 'performance gap', i.e. the (usually significant) disparity between the predicted/modelled energy performance of buildings at design stage and their actual operational performance. Surveys of completed buildings reveal a substantial gap between design expectations and delivered performance, especially energy performance. Addressing the degradation of performance between the

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<sup>23</sup> These fees may be updated in the future through a revision of the Environmental Design SPD.

planning stage and detailed design/construction stage will help to make Islington's carbon reduction policies more effective and will have a direct impact on delivering better performing buildings, and ultimately achieving the council's strategic aim of minimising the contribution of development in Islington to climate change.

- 6.44 Seeking to more accurately predict the future energy performance of a building by using metrics such as Passive House Planning Package (PHPP) or Chartered Institute of Building Services Engineers (CIBSE) TM54 will enable designers to consider factors that impact a building's actual operational performance at an earlier stage in the planning process. This will also enable a more accurate determination of the anticipated energy consumption and carbon emissions that can be used to verify the performance of the constructed building in operation, which is not possible with Building Regulation Part L percentage reductions. Planning and design carbon metrics based exclusively on Building Regulation Part L percentage improvements cannot be measured once a building is in operation and this makes efforts to reduce the performance gap very challenging. Metrics such as PHPP or CIBSE TM54 will ensure that design and construction choices are well informed, and therefore drive the design of better residential and non-residential buildings.
- 6.45 The predicted energy use of development should be declared in kWh/m<sup>2</sup>/yr and kWh/yr to address the issue of heat demand. This metric is appropriate to measure energy demand because it is independent of fuel type and as it has a number of benefits including design flexibility, consideration of building form, and being a known 'currency' for energy efficiency. The calculation of predicted energy use should be undertaken pre-planning, and updated during design and construction as part of the Energy Strategy. The calculation can then be verified during operation and should be reported through the GPP. Once the use of PHPP or CIBSE TM54 to calculate predicted energy use has been established, designers should use these methodologies to assess actual energy demand which will enable the future adoption of fabric first approaches based on performance metrics, such as Passivhaus and AECB Silver standards. Preventing poor quality construction will also help to reduce the performance gap.
- 6.46 The council is committed to working with key stakeholders, such as the Mayor of London, in order to promote good practice and information sharing in relation to energy performance.
- 6.47 This policy refers to the Building Regulations 2013. If these are updated, the policy threshold will be revised accordingly.

## Policy S5: Energy Infrastructure

- A. All major developments are required to have a communal heating system. Heating systems should have a maximum annual carbon content of heat of less than 280 gCO<sub>2</sub>/kWh, calculated using the carbon emissions factor for grid electricity from the most recently available Digest of UK Energy Statistics (DUKES). The heat source for the communal heating system must be selected in accordance with the following heating hierarchy:
- 1: connect to local existing or planned heat networks (subject to parts F and G below)
  - 2: use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system). Examples include recovering waste heat from London Underground ventilation shafts, recovering energy from the cooling requirements of datacentres, and using canal water for heating.
  - 3: generate clean heat and/or power from zero-emission sources, such as heat pumps powered by zero-carbon electricity from renewable sources, where appropriate.
  - 4: use fuel cells, which use the reaction between a fuel and oxygen to produce electrical energy. All development proposals using natural gas fuel cells must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NO<sub>x</sub> gas boiler.
  - 5: use low emission combined heat and power (CHP). All development proposals using CHP must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NO<sub>x</sub> gas boiler.
  - 6: use ultra-low NO<sub>x</sub> gas boilers.
- B. CHP and ultra-low NO<sub>x</sub> gas boiler communal or district heating systems (numbers 5 and 6 in the heating hierarchy set out in Part A) should be designed to ensure that there is no significant impact on local air quality.
- C. Minor new-build developments are required to use ultra-low NO<sub>x</sub> gas boilers as the heat source for their individual heating system. The use of individual air source heat pumps is not acceptable unless the development is located in an area which is not connected to the gas network. Larger minor new-build developments that are able to connect to a heat network in accordance with Part F of this policy are required to have a communal heating system (in accordance with the heating hierarchy) to enable connection. .
- D. All developments must demonstrate, as part of the Energy Strategy, that they have assessed the feasibility of heat network connection (including SHN) or other appropriate heat sources, in accordance with the heating hierarchy, in order to ensure low and zero carbon heating options are prioritised.
- E. All residential developments are required to provide an estimate of the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system within the Energy Strategy. Major applications should provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes.

- F. Major developments and larger minor new build developments located within 500 metres of an existing heat network, and larger minor new-build developments located within 50 metres, must be designed to connect to that network at the time of construction, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible. An existing heat network includes a planned network that will be in existence by the anticipated time of practical completion.
- G. Major developments and larger minor new build developments located within 500 metres of a planned future heat network, which is considered by the council likely to be operational within 3 years of a grant of planning permission must be designed to be able to connect to that network in the future. Developers are required to commit to connection and contribute to the cost of connection via a legal agreement, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- H. Where connection to an existing or future heat network is not possible, major developments should develop and/or connect to a low or zero carbon Shared Heating Network (SHN) linking neighbouring developments and/or existing buildings, unless it can be demonstrated that this is not reasonably possible.
- I. Where connection to an existing or future heat network is deemed possible under parts F and G above, major developments are required to provide a preferred energy strategy and an alternative energy strategy. The preferred energy strategy shall be based on connection to a heat network and shall be enacted. In cases where it is not reasonably possible to connect to a heat network the alternative energy strategy shall be enacted and the heat source will be selected in accordance with the heating hierarchy. Minor developments that are able to connect to a heat network are required to provide details of the connection in the energy strategy.
- J. The council will support the development of heat networks and energy centres in principle, subject to meeting wider policy requirements, including on design and air quality.

6.48 The selection of heat sources in line with the heating hierarchy will ensure that developments prioritise low and zero carbon heating options in order to contribute to the decarbonisation of heat, and therefore, the reduction of carbon emissions.

6.49 The use of low and zero carbon heating options, particularly heat networks, shared heat networks, and secondary heat sources will also help to reduce fuel poverty and increase energy resilience. The use of existing or planned heat networks and shared heat networks should be prioritised. Developments must connect to a network if they are located within the specified distance of an existing or future network. Where connection to a heat network or shared heat network is not possible (due to distance or feasibility), all developments should consider alternative low and zero carbon heat options in accordance with the heating hierarchy. Larger minor new-build developments are defined as development involving five units or more, or 500sqm of floorspace or more. Such developments should have a communal heating system where feasible.

6.50 The decarbonisation of heat is recognised as the biggest challenge facing UK energy policy today, and is one of the three key strategic objectives of the Committee on Climate Change. The UK has made good progress on decarbonising the National Grid;

however, very limited progress has been made on decarbonising heating, which still relies largely on combustion of gas, coal, oil and biomass to generate heat. Heating and hot water for UK buildings make up around 40% of energy consumption and 20% of greenhouse gas emissions. Natural gas remains by far the most common form of heating in UK homes, therefore a key goal of the decarbonisation of heat is reducing reliance on natural gas.

- 6.51 A key consideration when selecting heat sources that use natural gas is their impact on air quality due to the resulting Nitrogen Oxides (NO<sub>x</sub>) emissions, with Nitrogen Dioxide (NO<sub>2</sub>) in particular having a major impact on air pollution. Islington is covered by an Air Quality Management Area (AQMA), where national air quality objectives are not likely to be achieved. In order to avoid further deterioration of existing poor air quality, all development proposals using natural gas fuel cells or Combined Heat and Power (CHP) in Islington must provide evidence to demonstrate that emissions related to energy generation will be equivalent or lower than those of an ultra-low NO<sub>x</sub> gas boiler. CHP and ultra-low NO<sub>x</sub> gas boiler communal or district heating systems should be designed to ensure that they have no significant impact on local air quality.
- 6.52 In order to contribute to the decarbonisation of heat, applicants will be required to specify heating systems with a maximum annual carbon content of heat of 280 gCO<sub>2</sub>/kWh. This will eliminate the installation of high carbon heating systems such as poorly efficient gas boiler systems and district heating with natural gas fired CHP systems that do not have established plans for low carbon heat in the short to medium term. It will also promote the use of lower carbon heating systems such as efficient low NO<sub>x</sub> individual and communal gas boilers.
- 6.53 The maximum annual carbon content may be reduced further in future supplementary guidance, to encourage even lower carbon heating technologies to be adopted. Reducing the cap in the future may not affect electrical heating systems due to the projected reductions in the carbon content of electricity; however, the cap is an important tool to drive ongoing carbon reductions in other heating technologies, such as low carbon district heating systems to support heat networks, to support Islington's strategic vision for heat networks.
- 6.54 Heat generation and distribution systems are generally specified to enable buildings to achieve a reduction in carbon emissions in line with planning requirements, and the carbon factor of heat from several key technologies is calculated based on the carbon content of electricity. Unfortunately, due to the evolving carbon content of electricity, Part L of the Building Regulations currently uses outdated carbon factors for electricity. The results of any calculations based on these outdated carbon factors are misleading and the carbon reductions identified at planning stage are not accurate assessments of future carbon emissions/reductions from the chosen heating systems. This could lead to the wrong conclusions being drawn when comparing heating systems, resulting in the selection of a heating system with a higher carbon content over one with a lower carbon content, and preventing the borough from meeting future carbon reduction targets.
- 6.55 In order to enable better informed decisions to be made when selecting heating systems, applicants are required to calculate the carbon content of heat using the carbon emissions factor for grid electricity from the most recently available Digest of UK Energy Statistics (DUKES) which is published each year by BEIS, in addition to Building Regulation Part L calculations. The use of more accurate emissions factors to calculate the carbon content of heat will contribute to the decarbonisation of heat and help the borough to meet future carbon reduction targets.

- 6.56 In order to minimise fuel poverty linked to energy prices, the consequences of energy supply decisions at the planning stage must be assessed not only in terms of carbon efficiency, but also in terms of the likely energy supply prices. This is particularly important in the context of promoting low carbon heating systems because some systems, such as direct electric heating, can be low carbon while also leading to high energy bills. Part E of this policy seeks to resolve this by requiring all residential developments to estimate the anticipated heat unit supply price (£/kWh), annual standing charge and estimated annual maintenance costs of their proposed heating system; and requiring major applications to provide estimates of the life cycle costs of the proposed heating system using CIBSE quoted plant lifetimes.
- 6.57 Specific design standards to enable connection and future connection to heat networks are set out in the Environmental Design SPD. Heat networks and communal heating systems must be designed, constructed and operated to a high standard in accordance with CIBSE CP1: Heat Networks: Code of Practice (or any relevant successor document), which sets minimum and best practice standards. The design and construction of developments that are required to connect to an existing or planned heat network in accordance with this policy must also comply with this Code of Practice, and this should be demonstrated as part of the Energy Strategy. Compliance with this Code of Practice will promote best practice standards for heat networks across the supply chain.
- 6.58 All developments required to connect to an existing or planned heat network in accordance with this policy are required to ensure that the future heat network operator will be registered with the Heat Trust Scheme (or any other equivalent/future customer protection scheme). The Heat Trust Scheme is operated by a not-for-profit company that was established in 2015 and is sponsored by the Association for Decentralised Energy (ADE). The scheme offers protection for heat network customers and ensures that their rights are protected, which links to the council's objective of addressing fuel poverty.
- 6.59 The council will assess whether a development can reasonably connect to an existing heat network or can be designed to connect to a planned heat network based on a feasibility assessment, which must be submitted (as part of the Energy Strategy) at the earliest possible stage of the planning process, ideally at pre-application stage. The feasibility assessment will assess the technical feasibility of a development's heat demand being supplied in part or whole through connection to a heat network, and the financial reasonableness of the proposed connection charges. The council, or relevant Energy Service Company, will provide relevant information to inform the feasibility assessment, including an assessment of the approximate cost of connection. Feasibility assessments should consider a range of factors, including:
- the size and use class of the development, and the associated heat load and energy demands;
  - the capability of the network to supply part of all of the heat demand;
  - the location of the development and the distance to network pipes;
  - physical barriers e.g. roads and railways;
  - other developments in the vicinity that may also be required to connect to the network; and
  - an assessment of the financial implications of connection, using a Whole Life Costing methodology.
- 6.60 Where connection of a development to an existing or future planned heat network is required in accordance with parts F and G of this policy, and is deemed to be feasible,



developers are required to commit to connection prior to occupation via a Section 106 agreement for major developments, and a Unilateral Undertaking for minor developments. The legal agreement will include provision for a reasonable financial contribution to the council to enable connection and the submission of an updated Energy Strategy prior to implementation. Major developments located within 500 metres of a planned future heat network are required to be designed to be able to connect to that network in the future, in accordance with Part G of this policy. Within the legal agreement, a cut-off point will be defined which will be the latest point at which a decision can be made in relation to connection to a planned network. If at this time it is not possible to agree connection to a network due to the network being incomplete, the alternative energy strategy will be enacted.

- 6.61 The council's CIL charge provision for investment in heat network infrastructure in the borough and each of Islington's planned future heat networks is included on Islington's CIL Regulation 123 Infrastructure List (CIL 123 List) as infrastructure that may be funded by CIL. The CIL funding is intended to increase the size of the overall network to bring more sites within a reasonable connection distance. The financial contribution towards connection of a site to a heat network secured via a legal agreement is not covered by CIL and is a separate cost. The CIL 123 List excludes works that will be funded through Section 106 obligations in accordance with the tests set out in Regulation 122 of the CIL Regulations 2010 (as amended).
- 6.62 Where connection to an existing or planned heat network is not possible, developments with a communal heating system should fully explore any opportunities to support the establishment of new heat networks through developing and/or connecting to a Shared Heating Network (SHN) between neighbouring existing buildings or new developments using a low or zero carbon heat source. Such shared networks will contribute to the development of borough-wide heat networks. Whether development of or connection to a SHN is reasonably possible will be assessed by the council, based on a feasibility assessment which will consider a number of factors, including:
- the size and nature of the heat load within the development and neighbouring communally heated sites;
  - the distance between the sites;
  - any physical barriers e.g. roads and railways;
  - the practicality of connection, including willingness of existing building owners, timing of schemes and any other legal or management issues; and
  - the carbon reduction likely from such a connection, including the feasibility of use of low or zero carbon technologies.
- 6.63 Where a SHN is created, the anticipated carbon reductions should be assessed and agreed by the council.

## Policy S6: Managing heat risk

- A. Development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials.
- B. All developments (excluding householder extensions) must demonstrate, as part of the Energy Strategy, how the proposed design will reduce the potential for overheating and reliance on air conditioning systems, and maximise the incorporation of passive design measures in accordance with the following cooling hierarchy:
  - 1. minimise internal heat generation through energy efficient design
  - 2. reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls
  - 3. manage the heat within the building through exposed internal thermal mass and high ceilings
  - 4. provide passive ventilation, such as cross ventilation.
  - 5. provide low energy mechanical ventilation
- C. Use of technologies from lower levels of the hierarchy will not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.
- D. Major developments are required to include details of internal temperature modelling under projected increased future summer temperatures, to demonstrate that the risk of overheating has been addressed as part of the Energy Strategy.
- E. Householder extensions are encouraged to reduce the potential for overheating through the design of the extension, with particular reference to measures 1, 2 and 3 on the cooling hierarchy.

6.64 Managing heat is an important concern in Islington in the context of an increasing population and higher summer temperatures caused by climate change. The urban heat island effect means that temperatures will be intensified in dense urban areas such as Islington. The urban heat island effect is caused by extensive built up areas absorbing and retaining heat during the day and night leading to temperatures in some parts of London being several degrees warmer than the surrounding area. High temperatures can cause or worsen serious health conditions, particularly among children and the elderly. Ensuring buildings are designed and constructed to be comfortable in higher temperatures, without resorting to energy intensive air conditioning, is therefore crucial.

6.65 The cooling hierarchy seeks to manage heat risk in new developments and requires developments to incorporate measures which will ensure adaptation to rising summer temperatures, while minimising energy intensive cooling. The first step of the hierarchy is to minimise internal heat generation through energy efficient design. There are a number of low-energy-intensive and passive measures that can mitigate overheating risk, including solar shading, building orientation and solar-controlled glazing, as well

as ensuring energy efficient lighting and appliances which will not only reduce energy demand but also reduce heat generation.

- 6.66 Soft landscaping and urban greening including green roofs and trees can provide some mitigation of the heat island effect through evapotranspiration. Evapotranspiration is the process by which water is transferred from the earth to the atmosphere by evaporation from the soil and other surfaces, and by transpiration from plants, which provides a cooling effect. Green roofs and green walls can also manage heat gain in buildings by shading roof and wall surfaces.
- 6.67 Some aspects of energy efficient building design can lead to increases in overheating risk, including high proportions of glazing, increases in the building air tightness, and reduction of thermal bridges. Such energy efficiency measures mean that there may be cases where low energy mechanical ventilation with heat recovery (level 5 in the cooling hierarchy) is more energy efficient and better for air quality than natural ventilation, and therefore may be suitable for use within a development. Robust justification for use of low energy mechanical ventilation must be provided as part of the Energy Strategy, with clear reasons why higher levels of the cooling hierarchy are not appropriate.
- 6.68 Increased use of active cooling systems, such as air conditioning systems, is generally not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. However, in exceptional circumstances, active cooling systems may be suitable, where, overall, it would be more energy efficient and better for air quality than natural ventilation, due to potential aspects of energy efficient design noted in paragraph 6.67 above; and where low energy mechanical ventilation is demonstrably unfeasible. Where active cooling systems are provided, they should be designed to reuse the waste heat they produce and future district heating networks are expected to be supplied with heat from waste heat sources such as building cooling systems.
- 6.69 Where it is demonstrated that mechanical ventilation or active cooling are required, these should be used as part of a mixed mode cooling system to supplement passive cooling and other measures higher up the cooling hierarchy. Full-building mechanical ventilation and active cooling systems should only be considered as a last resort. The use of mechanical ventilation or active cooling will only be acceptable where best practice energy efficiency standards have been achieved, or in the case of residential developments, where the required Fabric Energy Efficiency Standard (FEES) has been achieved.
- 6.70 Modelling of major developments under predicted future temperatures is required as part of the Energy Strategy to ensure buildings are fully adapted to the changing climate. Requirements for thermal modelling are set out in the Environmental Design SPD. Major developments are required to include details of measurable outputs for the occupied building in relation to overheating risk as part of the Green Performance Plan (GPP), based on the commitments in the Energy Strategy.

## Policy S7: Improving Air Quality

- A. Development proposals should not:
- (i) cause significant harm to air quality, cumulatively or individually;
  - (ii) lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
  - (iii) reduce any air quality benefits that result from active measures/activities which seek to improve air quality; or
  - (iv) create unacceptable risk of high levels of exposure to poor air quality.
- B. Development proposals should address air quality as high as possible on the following hierarchy:
- 1) be at least Air Quality Neutral through provision of on-site measures. The development of large-scale redevelopment areas should propose measures across the area that will actively reduce air pollution and achieve an Air Quality Positive approach through the new development.
  - 2) use on-site design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. Where adequate mitigation is not provided and/or is not practical, planning permission may be refused.
  - 3) Where it can be demonstrated that on-site measures are impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.
- C. Development proposals are required to submit an Air Quality Assessment (AQA) to meet Air Quality Neutral standards, in line with Policy S2. The level of detail of the AQA should be proportionate to the scale of proposed development. A preliminary AQA should be carried out before designing the development to inform the design process.

6.71 All major developments (including refurbishments) should demonstrate that overheating has been effectively addressed by meeting the standards in the latest CIBSE guidance on assessing and mitigating overheating risk in new developments. CIBSE TM 59 should be used for domestic developments and CIBSE TM 52 should be used for non-domestic developments. CIBSE TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life. The GLA's Energy Planning Guidance provides further information on how these guidance documents and datasets should be used. In addition, internal temperature modelling should use weather files based on the latest climate change projections in order to assess the development against projected future summer temperatures. Further details are set out in the Environmental Design SPD.

- 6.72 Air pollution is one of the most significant challenges facing Islington. Air pollutants have a significant impact on health, quality of life and life expectancy, and the risk of exposure to air pollution is often worse in deprived areas, as these areas are often located near to busy roads and have a lack of green space. Poor air quality contributes to numerous diseases and conditions, particularly among more vulnerable people such as children, older people, and those with existing health conditions. Air pollution also has associated impacts on the economy through medical costs and lost productivity. In addition, air pollution impacts the environment through its negative effects on the quality of water, soil and ecosystem health, which can be very damaging for biodiversity and wildlife. Islington's Air Quality Action Plan outlines the proposed actions in Islington to reduce air pollution and lower exposure to the main pollutants between 2018 and 2022.
- 6.73 New developments should be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible; development should be at least air quality neutral. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people.
- 6.74 Large-scale developments proposing more than 50 residential units and/or more than 2,500sqm gross internal area should achieve an Air Quality Positive approach.
- 6.75 The whole of Islington is covered by an Air Quality Management Area (AQMA), where national air quality objectives are not likely to be achieved. In addition, the GLA has identified specific Air Quality Focus Areas (AQFAs) to assist boroughs with targeting air pollution hotspots as part of action planning. AQFAs are locations of high human exposure where national air quality objectives are exceeded and where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. Several Air Quality Focus Areas (AQFA) are located in Islington, as identified in the London Plan (or in other published updated documentation).
- 6.76 In accordance with the Air Quality Standards Regulations 2010, new developments must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. Developments proposed in areas that no longer exceed air quality limits due to improvements to air quality should not harm air quality and cause the area to return to poor air quality levels. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.
- 6.77 All developments are required to submit an Air Quality Assessment (AQAs) and preliminary Air Quality Assessment (AQA). The aim of the preliminary Air Quality Assessment (AQA) is to assess:
- The most significant sources of pollution in the area
  - Constraints imposed on the site by poor air quality
  - Appropriate land uses for the site based on the air quality that potential occupants will be exposed to. Uses considered to be particularly sensitive to air quality issues include residential, education, hospitals and care homes for older people. Locations considered likely to have particularly significant air quality issues include sites close to roads (particularly those on lower floors on the TfL Road Network and Borough Principal Road Network) and those affected by certain industrial processes.

- Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality, including building design and site layout, and urban greening to provide pollution absorbing benefits, particularly tree planting.
- 6.78 As the design evolves further assessments should also be carried out in order to ensure that impacts from emissions are prevented or minimised as far as possible, and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby -developments are also underway or likely to come forward.
- 6.79 When assessing a development's impact on local air quality the council will consider pollution, smells and fumes from construction and operation, including fixed plant, such as boiler and emergency generators, and any associated transport. Impact assessments should always include all relevant pollutants. Industrial, waste and other working sites may need to include on-site vehicles and mobile machinery as well as fixed machinery and transport sources.
- 6.80 The two pollutants causing most concern in London and Islington are Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM). Traffic emissions are largely responsible for these pollutants, predominantly through exhaust emissions, and brake and tyre wear and dust. Despite significant improvements, parts of Islington have consistently exceeded EU limits for Nitrogen Dioxide (NO<sub>2</sub>) for many years, mainly along the A1 Holloway Road from Highbury to Archway; Angel Town Centre; Seven Sisters Road at Finsbury Park; Old Street and surrounding areas in the south of the borough; and the King's Cross/Caledonian Road area. While Islington is not breaching current EU limits for PM levels, it is in breach of the World Health Organisation (WHO) limits, which are lower.
- 6.81 Emissions associated with the design and operation of developments in Islington also have a significant impact on air quality. This is mainly due to the use of gas as the main heat source for space and water heating. Improvements to air quality can be achieved through the adoption of an integrated approach to energy supply which maximises both air quality and climate change benefits, which ensures heating systems do not have a significant impact on local air quality. This will be achieved through provision of low or zero-emission heating and energy, in accordance with the heating hierarchy set out in Policy S5.
- 6.82 The operation of new developments can lead to an increase in transport related emissions. Islington's car-free Policy seeks to contribute to reducing these pollutants and improving air quality. Islington is a car-free borough, meaning that no new parking spaces or permits will be allowed as part of new development. Policy T3 provides further detail on the operation of the car-free policy.
- 6.83 Other transport related emissions associated with the development, such as air pollution resulting from the construction process, including Non-Road Mobile Machinery, also contribute to poor air quality in the borough. Policy T5 has specific requirements relating to construction practices. Other guidance, such as the GLA control of dust and emissions from construction and demolition best practice guidance, may also be applicable.
- 6.84 It may not always be possible in practice for developments to achieve Air Quality Neutral/Positive standards or to acceptably minimise impacts using on-site measures alone. If a development can demonstrate genuinely exceptional circumstances, showing clear evidence that it has exploited all relevant on-site measures possible,

appropriate and meaningful off-site mitigation, or an off-setting contribution secured through S106, may be acceptable.

## Policy S8: Flood Risk Management

- A. A site specific Flood Risk Assessment (FRA) will be required for:
- (i) Proposals on sites of 1 hectare or greater;
  - (ii) New development (including minor development and changes of use) located in a critical drainage area;
  - (iii) Proposals involving a change of use in development type to a more vulnerable class;
  - (iv) 'Highly Vulnerable' development located in an area of High or Medium surface water flood risk; and
  - (v) 'More Vulnerable' development located in an area of High surface water flood risk.
- B. The site-specific FRA must assess the risk of flooding to and from a proposed development in detail, focusing particularly on surface water flooding, taking climate change projections into account. The assessment must demonstrate how flood risk to will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This should include assessment of appropriate flood proof design and construction methods, and Sustainable Urban Drainage Systems (SUDS).
- C. Groundwater flooding should be investigated in detail for developments located in areas identified as having potential for groundwater flooding.
- D. 'Highly Vulnerable' development, including basement dwellings, proposed in 'High' surface water flood risk areas, and/or where there is potential for groundwater flooding of property situated below ground level or potential for groundwater flooding to occur at surface are required to incorporate appropriate flood proof construction methods in order to mitigate the risk of flooding. Essential infrastructure associated with proposed developments in 'High' surface water flood risk areas should be located above ground floor level, where possible.

6.85 Islington's flood risk management policies have been informed by the Level 1 Strategic Flood Risk Assessment (SFRA), which reviews all sources of flooding in the borough. Islington is located entirely in Flood Zone 1 which means there is a low risk of fluvial (river) flooding<sup>24</sup>; however there is risk of flooding to development from other sources in Islington, including from groundwater, sewers, artificial sources, and surface water. Islington is at risk from surface water flooding due to the densely developed nature of the borough and a large extent of impermeable surfaces. Surface water flood risk in

<sup>24</sup> Flood Zone 1 Definition: Land having a less than 1 in 1,000 chance of river flooding each year (0.1% AEP), Flood risk and coastal change PPG, <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Islington is predicted to rise as climate change increases the frequency and intensity of heavy rainfall, and as ongoing development and intensification of the borough increases the volume of surface and waste water draining to the combined sewer.

- 6.86 Islington's SFRA provides detailed information regarding the areas at risk from surface water flooding across the borough based on the Environment Agency's 'Risk of Flooding from Surface Water (RoFSW)' mapping; data from Islington's Surface Water Management Plan (SWMP); and detailed borough-wide surface water modelling undertaken in 2017. Further information is available in Islington's SFRA.
- 6.87 As a Lead Local Flood Authority (LLFA), Islington Council has lead responsibility for monitoring and managing local flood risk in the borough, including from surface water, groundwater and ordinary watercourses, taking into account new development in land use plans and strategies<sup>25</sup>. A key responsibility of the council as a LLFA is to seek opportunities to reduce the risk of flooding from the sewer network through consultation with Thames Water to determine key areas for maintenance and flood alleviation schemes.
- 6.88 Part A of the policy draws on the NPPF requirements in relation to when a site-specific FRA is required for developments located in Flood Zone 1. The NPPF requires a site-specific FRA to be submitted for development located in an area with critical drainage problems, as defined by the Environment Agency. While there are currently no Environment Agency defined Critical Drainage Areas (CDAs) in Islington, Part A requires a site-specific FRA to be submitted for developments located in a CDA, defined by Islington's SWMP as "a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure."
- 6.89 A specific development within a CDA is not necessarily at higher risk from surface water compared to a development outside of a CDA. However, the location of a development within a CDA indicates that it is within a catchment area which contributes to a flooding hotspot. Figure 6.1 demonstrates that more than half of the Borough is located within one of Islington's three Critical Drainage Areas.
- 6.90 Islington's SWMP also identified eight Local Flood Risk Zones (LFRZ) which are all located within one of the three CDAs, as illustrated in Figure 6.1. A LFRZ is defined in the SWMP as "discrete areas of flooding that do not exceed the national criteria for a 'Flood Risk Area' but still affect houses, businesses or infrastructure. A LFRZ is defined as the actual spatial extent of predicted flooding in a single location."
- 6.91 The flood risk vulnerability classifications for different development uses referred to in Part A of this policy are defined in the national Planning Practice Guidance and repeated in Table 6.4 below. Where a new development is classified as 'More Vulnerable' or 'Highly Vulnerable', or where a change of use will result in an increase in the vulnerability classification, the FRA should demonstrate how the flood risks to the development will be managed so that it remains safe through its lifetime, including provision of safe access and egress.

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<sup>25</sup> Flood risk management: information for flood risk management authorities, asset owners and local authorities, available from: <https://www.gov.uk/guidance/flood-risk-management-information-for-flood-risk-management-authorities-asset-owners-and-local-authorities#overview>



**Table 6.4: Flood Risk Vulnerability Classification<sup>26</sup>**

Vulnerability Classification	Development Uses
Essential Infrastructure	<p>Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</p> <p>Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</p> <p>Wind turbines.</p>
Highly Vulnerable	<p>Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</p> <p>Emergency dispersal points.</p> <p>Basement dwellings.</p> <p>Caravans, mobile homes and park homes intended for permanent residential use.</p> <p>Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”).</p>
More Vulnerable	<p>Hospitals.</p> <p>Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.</p> <p>Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</p> <p>Non–residential uses for health services, nurseries and educational establishments.</p> <p>Landfill and sites used for waste management facilities for hazardous waste.</p> <p>Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</p>
Less Vulnerable	<p>Police, ambulance and fire stations which are not required to be operational during flooding.</p> <p>Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non–residential institutions not included in “more vulnerable”, and assembly and leisure.</p> <p>Land and buildings used for agriculture and forestry.</p>

<sup>26</sup> Available from: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

	<p>Waste treatment (except landfill and hazardous waste facilities).</p> <p>Minerals working and processing (except for sand and gravel working).</p> <p>Water treatment works which do not need to remain operational during times of flood.</p> <p>Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).</p>
<p>Water- Compatible Development</p>	<p>Flood control infrastructure.</p> <p>Water transmission infrastructure and pumping stations.</p> <p>Sewage transmission infrastructure and pumping stations.</p> <p>Sand and gravel working.</p> <p>Docks, marinas and wharves.</p> <p>Navigation facilities.</p> <p>MOD defence installations.</p> <p>Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</p> <p>Water-based recreation (excluding sleeping accommodation).</p> <p>Lifeguard and coastguard stations.</p> <p>Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</p> <p>Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</p>

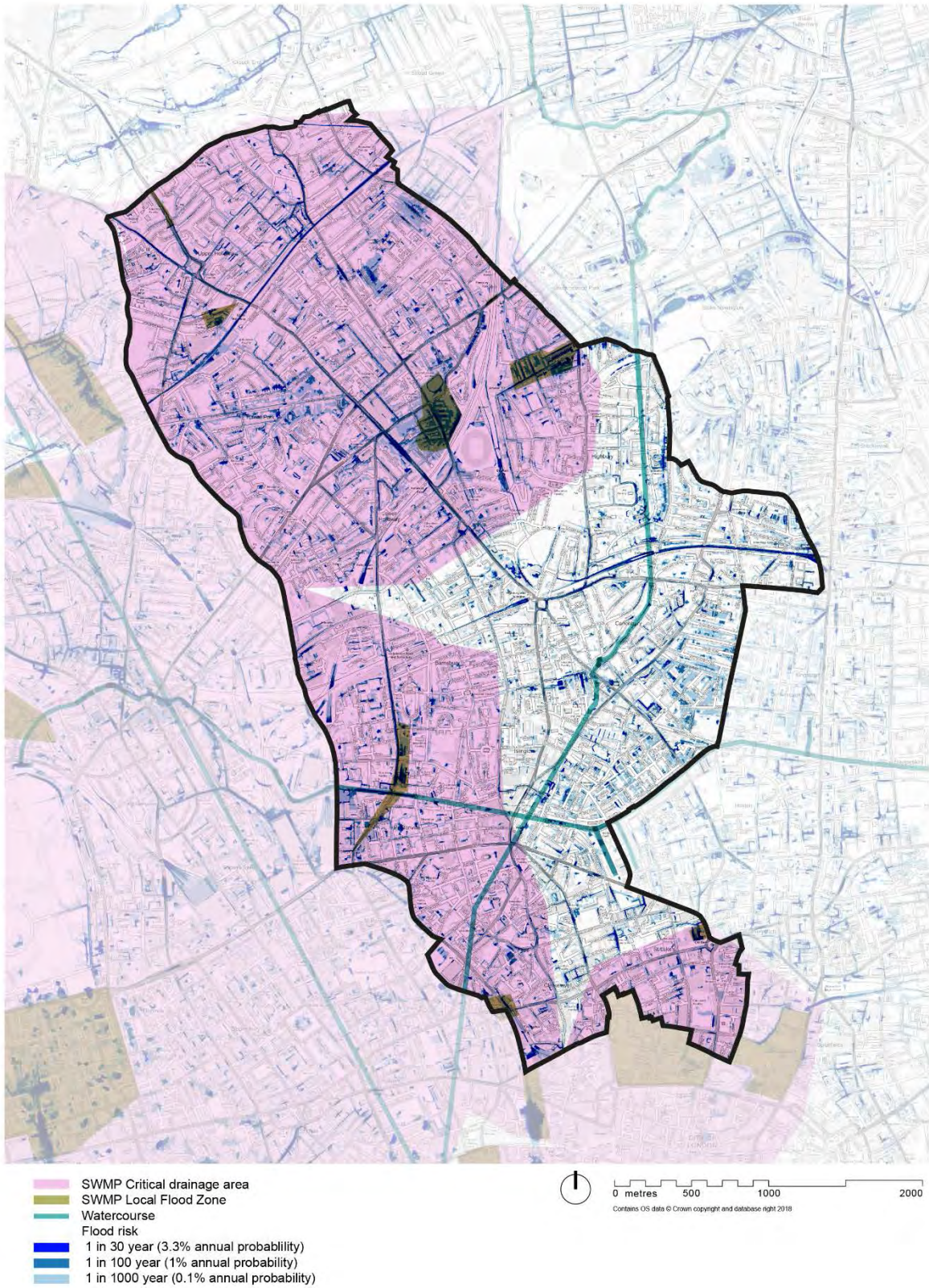
6.92 The identification of high, medium, and low surface water flood risk is based on data from the Environment Agency's RoFSW, which provides bandings of Low (within the flood extent during a 1 in 1000 year rainfall event), Medium (within the flood extent during a 1 in 100 year rainfall event) and High (within the flood extent during a 1 in 30 year rainfall event) surface water flood risk. The areas at risk of flooding from surface water based on the RoFSW data are displayed in Figure 6.1. The RoFSW modelling demonstrates that areas at high, medium and low risk of surface water flooding largely follow human-made features such as roads and rail lines, particularly in high risk areas. Increased potential for surface water flooding is also identified around properties in low risk areas, particularly in areas of low topography around Canonbury and Clerkenwell Road, as well as the Upper Holloway area between Tollington Road and the Emirates Stadium, and on Holloway Road.

6.93 Site-specific FRAs should be proportionate to the degree of flood risk and should also be appropriate to the scale, nature and location of the development. When assessing FRAs, the council will consider the potential contribution of a development to flood risk off-site and the cumulative impact of new development on flood risk. The assessment

should establish whether a proposed development is likely to be affected by current or future flooding from any source and whether it will increase flood risk elsewhere. While there is a low risk of fluvial (river) flooding in the borough, all site-specific FRAs must investigate the risk of surface water flooding in detail, and where relevant, groundwater, sewers, and artificial sources should also be assessed, utilising the mapping presented in Islington's SFRA. Assessments for developments within flood risk areas should make reference to local flood warning and emergency procedures, and emergency planning strategies should be put in place in order to direct people to safety during times of flooding.

- 6.94 The SWMP Critical Drainage Areas and Local Flood Risk Zones, and the Environment Agency's RoFSW dataset should be used as a starting point for the site-specific FRA to indicate areas with a potential for surface water flood risk in the Borough. These are shown on Figure 6.1 below:

**Figure 6.1: Flood Risk from Surface Water (Islington Surface Water Management Plan and Environment Agency data)**



- 6.95 Detailed investigation into the sustainable management of flood risk will be expected for developments in these areas. Flood risk from other sources should also be considered based on the mapping provided as part of Islington's SFRA. The detailed borough-wide surface water modelling Figure 6.1 as presented in the SFRA should be used alongside the Environment Agency's RoFSW data to provide a more detailed assessment of surface water flood risk in the borough which should inform the planning of appropriate mitigation measures for proposed developments. The detailed Borough wide surface water modelling for Islington shows that surface water flooding predominantly follows roads and heavily urbanised areas including Hornsey Road, Holloway Road and Courtauld Road. Surface water ponding is present in areas of low topography around Wray Crescent, Gillespie Road and to the south of Downcross Street.
- 6.96 While the Environmental Agency's RoFSW data and the detailed borough-wide surface water modelling datasets are the most recent and up-to-date surface water modelling that has been undertaken at the time of writing, the Environment Agency's Flood Warning Information Service<sup>27</sup> and interactive flood risk maps should also be checked for any updates to the data and used to inform the site-specific FRA. .
- 6.97 The assessment of surface water flood risk to a development as part of the FRA should take account of climate change projections based on the detailed borough-wide modelling, as illustrated in the SFRA. In Islington, climate change is likely to predominantly increase flood risk from surface water. In order to account for the impacts of climate change to be factored in, the detailed surface water modelling has included an output with a 40% allowance for climate change, in accordance with the Environment Agency guidance on Flood Risk Assessments: Climate Change Allowances<sup>28</sup>, which updates previous climate change allowances to support the NPPF. This means that a 40% increase in peak rainfall intensity for the 1 in 100 year storm event is applied.
- 6.98 Islington's SFRA has also identified areas of the borough that have 'potential for groundwater flooding of property situated below ground level' or 'potential for groundwater flooding to occur at surface', based on data from the British Geological Survey and presented in the SFRA.
- 6.99 Developments that are required to submit a site-specific FRA are encouraged to engage with the council at the earliest opportunity, to establish appropriate management and mitigation techniques. The PPG sets out the ways in which new development can be made safe from flood risk through designing buildings to avoid flooding in the first instance, for example by raising finished floor levels and access levels, and introducing thresholds to buildings. Careful consideration should also be given to the development layout as a way to avoid the impacts of flooding, particularly in relation to vulnerable uses. In addition to design, the potential impacts of flooding to property and people can be mitigated using a range of flood proof construction measures including use of suitable materials and construction techniques for floors, walls, doors and windows and fittings.
- 6.100 When a proposal involves the re-development of existing buildings comprising more than one property, the use of flood proof construction methods should focus on individual properties to ensure risk is mitigated effectively for all properties involved.

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<sup>27</sup> Available from: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>.

<sup>28</sup> Available from: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

Appropriate mitigation measures should be incorporated that are proportionate to the flood risk and would not increase the risk of flooding to surrounding areas. Further guidance on flood proof design and construction is also provided in the Environmental Design SPD.

6.101 The site-specific FRA should ensure that surface water generated by the site is managed in a sustainable manner and does not increase the flood risk on existing infrastructure in the neighbouring area. Potential overland flow paths should be considered to ensure that buildings do not obstruct flows and all opportunities should be taken during development to reduce existing runoff rates, in accordance with Policy S9. Developments located in areas identified as being at particular risk of surface water flooding, should provide additional detail on mitigation measures, including SUDS. Where basements are proposed, the risk of surface water and/or groundwater flooding should be considered in detail. Appropriate mitigation measures should be investigated, including raised thresholds and inclusion of storage for surface water in such developments.

### **Policy S9: Integrated Water Management and Sustainable Drainage**

- A. All development proposals should adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and in the context of links with wider-than-site level plans. Water management should be considered as early as possible in the design process.
- B. All major developments must submit a Surface Water Drainage Pro-forma to ensure surface water drainage proposals meet policy requirements. All development proposals must ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy.
  - 1. rainwater harvesting (including a combination of green and blue roofs)
  - 2. infiltration techniques and green roofs
  - 3. rainwater attenuation in open water features for gradual release
  - 4. rainwater discharge direct to a watercourse (unless not appropriate)
  - 5. rainwater attenuation above ground (including blue roofs)
  - 6. rainwater attenuation below ground
  - 7. rainwater discharge to a surface water sewer or drain
  - 8. rainwater discharge to a combined sewer.
- C. Major development proposals located in a Critical Drainage Area or an area of High surface water flood risk are required to manage surface water run-off in accordance with points 1 to 5 of the drainage hierarchy.
- D. Development proposals for impermeable paving will be refused, including on small surfaces such as front gardens and driveways.

- E. All developments are required to demonstrate that appropriate Sustainable Urban Drainage Systems (SUDS) have been implemented in accordance with the drainage hierarchy to ensure that surface water runoff rates and volumes entering open space are predictable and water at the surface is clean and safe. All developments must identify how the initial run off from a site following a rainfall event will be dealt with.
- F. Major developments creating new floorspace, and major changes of use that will result in an intensification of water use must be designed to achieve the following standards:
- (i) Surface water flows from the site must be reduced to a greenfield run-off rate (8 litres/second/hectare for Islington), where feasible. Where it is demonstrated that achieving a greenfield run-off rate is not feasible, runoff rates should be minimised as far as possible. The maximum permitted runoff rate will be 50 litres/second/hectare.
  - (ii) The volume of run-off that must be stored on site should be calculated based on the nationally agreed return period value of a 1 in 100 year storm event plus a 40% allowance for climate change for the worst storm duration. Where the site-specific FRA indicates that an additional volume of run-off must be stored above and beyond the amount calculated based on the method above, this must be provided on site.
- G. Major developments involving works to an existing building are encouraged to reduce run-off rates for the site as a whole, rather than focusing solely on new buildings.
- H. All minor new build developments of one unit or more are required to reduce existing run-off levels as far as possible. Where this is demonstrated not to be possible, existing run-off levels must be maintained as a minimum.
- I. SUDS should be designed and implemented as a central part of the Landscape Design Strategy using an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation. All developments should maximise areas of soft landscaping and other permeable surfaces to support this, in accordance with Policy G4.
- J. All developments must demonstrate that they have minimised the use of mains water and have been designed to be water efficient, through the Sustainable Design and Construction Statement. Water use must be minimised as part of all developments by reducing water demand in the first instance through the installation of water efficient fittings and appliances, and the use of water saving measures. Developments should use smart metering, and retrofitting of water efficiency measures is encouraged where feasible.
- K. Residential development must minimise water consumption in accordance with the Optional Requirement of the Building Regulations, achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). Non-residential developments, including refurbishments, must minimise water consumption by achieving at least the BREEAM Excellent standard for water consumption.

L. Major developments and/or developments with high/intense water usage - including hotels, hostels, and student housing - are required to incorporate a rainwater and greywater recycling system. Minor developments should incorporate rainwater recycling, where feasible and practical.

6.102 All developments should adopt an integrated approach to water management and ensure that surface water is managed sustainably and effectively. LLFAs are statutory consultee in relation to the use of Sustainable Urban Drainage Systems (SUDS) in planning applications for major developments. As an LLFA, the council must ensure that SUDS are incorporated into all major development proposals where appropriate, and that they adhere to necessary national and local SUDS standards. This includes providing technical advice on surface water drainage on major developments where required.

6.103 An integrated approach to water management enables the interrelated issues of sustainable drainage, water efficiency, water quality and biodiversity to be considered holistically across a site, taking into account links with wider-than-site level plans where relevant. Islington is at risk from surface water flooding, as set out in Policy S8. Water management should be considered at the earliest possible stage in the design process to ensure that appropriate decisions are made regarding landscaping and engineering.

6.104 Source control of surface water is critical in an urban environment such as Islington with its larger areas of impermeable surfaces, and should be incorporated on all schemes to reduce the rate and volume of surface water run-off. The most effective forms of source control are rainwater harvesting and infiltration because these prevent surface water from leaving the site. Infiltration techniques, such as porous surfaces will only be possible in non-clay areas. Where it is demonstrated that volumes cannot be managed at source, runoff should be controlled to flow slowly to on-site water features or water storage for gradual release. Attenuation above ground is preferable to attenuation below ground or in a basement because pumping is normally required to empty a below ground attenuation tank which requires energy use and has risks of mechanical failure. Attenuation above ground can also be utilised to maximise additional biodiversity or amenity benefits. In accordance with the hierarchy, there should be a preference for green features which are part of the natural environment, over grey features which involve hard surfaces, engineered solutions and conventional drainage systems.

6.105 Green roofs are particularly effective SUDS measures as they provide interception storage and will typically intercept the first 5mm or more of rainfall depending on the depth and type of substrate. Green roofs also provide treatment of the pollutants carried in the initial run-off from the site following a rainfall event and have additional biodiversity benefits.

6.106 A blue roof is an attenuation tank at roof or podium level which can provide rainwater attenuation and minimise surface water flood risk. Rainwater is collected within the roof structure before being discharged at a defined controlled rate via a restrictive flow outlet. Blue roofs are particularly beneficial on constrained sites where there is no space to incorporate SUDS measures as part of soft landscaping, or where construction is being carried out within flood sensitive and additional runoff storage is required. Blue roofs can be installed as part of the drainage and support layer for a green roof. The combination of a blue and green roof can be used to provide rainwater harvesting which allows the attenuated water is used to irrigate the green roof as part



of an integrated approach to water management on a site. Further information is provided in Policy G5.

- 6.107 The use of a blue roof will only be acceptable where it can be clearly demonstrated that the suitability of options higher up the hierarchy have been investigated fully and incorporated where possible. In cases where a blue roof is an appropriate option, it is particularly important that the design implications are considered as early as possible in the design process. As the installation of a blue roof has weight load implications a structural engineer must be engaged with from the early stages of the design process.
- 6.108 The flood risk areas referred to in Part C of this policy are based on Islington's three Critical Drainage Areas (CDAs) as identified by Islington's Surface Water Management Plan (SWMP) and 'High' surface water flood risk areas as identified by the Environmental Agency's RoFSW data, as illustrated in Policy S8. Impermeable paving will be refused to limit the cumulative effect on surface water flood risk.
- 6.109 SUDS should be implemented as part of all development proposals unless it can be demonstrated that this is not possible. SUDS help to manage flood risk by reducing the quantity of water runoff from a development entering drains and pooling on hard surfaces, especially at peak periods. Particular types of SUDS can also help to improve the quality of water runoff by filtering out pollutants and providing physical, chemical or biological treatment of water to remove contaminants. Surface water can pick up pollutants as it runs across a site, which in turn enters the combined storm water and sewer system. Where land is contaminated, the design of SUDS techniques should take this into account, for example by avoiding measures that involve infiltrating water into the subsoil. SUDS also reduce the need for expensive conventional drainage systems, providing cost savings.
- 6.110 The initial run off from a site following a rainfall event is also known as the 'first flush' (normally the first 5mm or more) and can carry accumulated silt and pollutants. Green roofs can effectively treat the pollutants carried in the first flush, and other measures such as swales and bio-retention areas can provide additional cleaning of runoff to improve water quality.
- 6.111 The greenfield runoff rate in Islington, referred to in Part F of this policy, has been set by the Environment Agency at 8 litres/second/hectare (or equivalent for sites under one hectare). On sites where it can be demonstrated that this is not possible, a higher rate of run-off, as set out in the policy, may be agreed with the council. The volume of run-off that must be stored on site should be calculated based on the nationally agreed return period value of a 1 in 100 years storm event, plus an allowance of 40% for an increase in rainfall intensity from climate change - in accordance with Environment Agency guidance <sup>29</sup> - to ensure the volume of run off from the site can be stored on the site in the future. In Islington, climate change is likely to predominantly increase flood risk from surface water.
- 6.112 The Surface Water Drainage Pro-forma will assist developers and designers in meeting the sustainable drainage requirements included in this policy<sup>30</sup>. Achieving surface water run-off targets under the relevant BREEAM scheme will also contribute to meeting the policy requirements. Minor new build schemes will be expected to show that they have utilised all available techniques to avoid increasing run-off and to reduce it as far as possible. This should include maximising areas of green/blue roofs,

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<sup>29</sup> Flood risk assessments: climate change allowances, available from: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

<sup>30</sup> Further information is provided in the Environmental Design SPD.

particularly on new buildings; maximising areas of soft landscaping; ensuring all hard surfaces are permeable or drain into permeable features, and making use of other SUDS techniques as appropriate.

- 6.113 The design and implementation of SUDS should be demonstrated as part of the Landscape Design Strategy. The protection and enhancing of areas of biodiversity value should be considered when determining the suitability of SUDS. This will promote an integrated approach that incorporates SUDS into the landscape design in order to maximise biodiversity and water use efficiency, alongside the amenity and recreation benefits of SUDS. Opportunities for the use of SUDS of educational and interactive purposes should also be explored where feasible. Further details on Landscape Design Strategies are set out in Policies G4 and S2. Further guidance on SUDS is set out in the Environmental Design SPD. The adoption of appropriate SUDS measures should be informed by relevant best practice and standards, particularly the CIRIA SUDS Manual.
- 6.114 The combination of climate change bringing periods of drought, expanding population and increased water usage means that water demand in the future will outstrip supply unless mains water demand is reduced. All developments are required to minimise the use of mains water as part of an integrated approach to water management. The Optional Requirement of the Building Regulations included in Part K of this policy requires that water use in new dwellings is limited to 110 litres per person per day. As this includes 5 litres for external water use, the target for internal use is 105 litres per person per day. The requirement for non-residential developments to minimise water consumption in accordance with BREEAM is set out in Policy S3. In order to achieve BREEAM requirements in relation to water consumption, water use demand must be reduced first, with rain and greywater recycling being necessary to achieve a higher number of credits.
- 6.115 Examples of water efficient fittings and appliances include lower flow taps reduced-capacity baths, and water-efficient showerheads, all of which can help reduce energy consumption as well as water consumption. Further details on water efficient fittings and appliances is provided in the Environmental Design SPD. The use of measures such as water efficient fittings, smart metering, and water saving and recycling measures will help to achieve lower water consumption rates and ensure that buildings are designed for future water requirements and pressures.
- 6.116 Rainwater and greywater recycling systems capture rainwater or greywater and then treat the water for re-use on-site. They are particularly appropriate for use in major developments and/or developments with high or intense water use, because these developments have high water demand, which makes the use of such systems feasible. The suitability and viability of different systems will depend on an assessment of water demand, potential harvested supply and any other cost/benefit issues.

## Policy S10: Circular Economy and Adaptive Design

- A. All developments must adopt a circular economy approach to building design and construction in order to keep products and materials in use for as long as possible and to minimise construction waste.
- B. Buildings should be made from components and materials that can be reused or recycled. Building design must enable deconstruction to ensure the maximum value of building components can be recovered and re-used at the end of the building's life. Where demolition and remediation works are necessary, materials should be re-used and/or recycled.
- C. All developments must be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use.
- D. All major developments (including refurbishment and redevelopment of existing buildings), minor new build developments, and larger minor extensions are required to provide an Adaptive Design Strategy as part of the Sustainable Design and Construction Statement. The Adaptive Design Strategy must demonstrate how a circular economy approach has been adopted as part of the building design and construction, and how the building will adapt to change over its lifetime. The Strategy must include evidence to demonstrate that the development will be designed and constructed to:
  - (i) Suit its anticipated lifespan;
  - (ii) Avoid construction waste and the unnecessary demolition of structures;
  - (iii) Be built in layers to allow elements of buildings to be replaced overtime, supporting a modular design;
  - (iv) Be adaptable – the plan form, layout and structure enables the building to be adapted to respond to change and/or adapted for various uses throughout its life;
  - (v) Enable ease of deconstruction - building materials, components and products can be disassembled and re-used at the end of their useful life; and
  - (vi) Ensure all materials arising from demolition and remediation works will be re-used and/or recycled.
- E. All development must minimise the environmental impact of materials through the use of sustainably-sourced, low impact and recycled materials, using local supplies where feasible.
- F. All developments are required to take all possible measures to minimise the impact of construction on the environment and comply with Islington's Code of Practice for Construction Sites.

6.117A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. A circular economy approach will save resources, improve resource efficiency and help to reduce carbon emissions. The adoption of circular economy principles will also help to reduce waste production as part of the aim for developments to produce

net zero-waste. The successful implementation of a circular economy approach requires the establishment of strategy and policies beyond the local level, from the Mayor of London and Central Government. The North London Waste Plan sets out further details in relation to London's approach to waste.

- 6.118 Designing and constructing buildings that can be adapted and deconstructed, and which are made from materials and components that can be reused or recycled, will contribute to making a more regenerative and sustainable built environment. Building design should be viewed holistically, with a building being considered as the sum of its component parts, and in the context of the building design life and the likely future needs of users. A central consideration when designing and constructing a new building, or when extending the life of an existing building, should be how the building can be kept in use for as long as possible to ensure resource efficiency. There are various factors which can contribute to a building becoming obsolete, including build quality, physical deterioration, technology changes, market forces, and regulation. Building design should consider how the building can respond to change within its life and be adapted to suit a variety of uses, users, and configurations, to prevent (or delay as far as possible) the onset of obsolescence. Design features that enable adaptation should be incorporated within the building.
- 6.119 In order to support a circular economy approach, that all developments must be designed to be adaptable and able to respond to change. The extent to which a building must be adaptable to changes in land use and market demands will vary depending on the land use type. Residential developments are unlikely to require a change of use in the future and are designed for a longer life span. In contrast, non-residential developments are likely to have a shorter life-span, and therefore it is especially important that non-residential developments are designed to be adaptable and flexible. In addition, different types of non-residential development will have varying requirements in terms of adaptability and this will also vary depending on the operations and operators within a development. For example, office developments must be designed to be particularly adaptable because the tenant/operator is likely to change more often. All development types should be designed to be adapted to changes in the physical environment. In particular, building form, layout and structure should be designed to address overheating and flood risk, particularly in the context of climate change, where feasible and practical. The design of adaptable building forms, and adaptations to the form of existing buildings, must maximise fabric energy efficiency in accordance with Policy S4.
- 6.120 The densely developed nature of boroughs such as Islington, with few vacant or empty sites, means that any new construction is usually preceded by the demolition of existing building infrastructure. However, mechanical demolition fails to respect the values of building components as reusable materials and therefore it is vital that consideration is given to deconstruction as a method of taking down a building in order to ensure the maximum value of building components and enable materials to be recovered at the end of the building's life. Design for deconstruction may take longer than demolition and require more labour, however the materials recovered through the deconstruction process have a high and instant value that can be realised. Demolition also has energy impacts in terms of embodied energy of different materials and also the energy used to demolish a building; air quality is also negatively affected by demolition. Achieving BREEAM credits in relation to materials will assist non-residential developments in reducing the environmental impact of the materials used and promote efficiency in the consumption of construction products. BREEAM requirements are set out in Policy S3.

- 6.121 The Adaptive Design Strategy should outline how the building design has been developed to be adaptable, and it should detail the commitments that will take the design through to construction. Applications shall include details of adaptive design proportionate to the scale of the development. Applicants should consider the use of life cycle assessments using Building Information Modelling (BIM) to ensure resource efficiency (from production and procurement to construction and disposal) alongside their practical and aesthetic value as a means of demonstrating consideration of all elements of sustainable design.
- 6.122 The sustainable procurement of materials, including the use of recycled, low impact and sustainably-sourced materials can be achieved by maximising materials ratings on the BRE Green Guide. Targeting relevant BREEAM credits in relation to materials will assist non-residential development to achieve these requirements.
- 6.123 All developments should comply with Islington's Code of Practice for Construction Sites in order to minimise the possible negative effects of construction, such as air pollution, noise and vibration, traffic congestion, dust and contamination of land and water and disturbance of local ecology. Policy T5 provides further information.

# 7 Public Realm and Transport

## Policy T1: Enhancing the public realm and sustainable transport

- A. A coherent and inclusive public realm, in conjunction with effective transport, are key elements of ensuring delivery of the Local Plan objectives. All development proposals should take into account the link between land use, transport accessibility and connectivity, and promoting journeys by physically active means, like walking or cycling (known as active travel). Applicants must provide appropriate information to allow proper assessment of transport impacts and show how these impacts can be addressed, as set out in Appendix 3.
- B. The design of developments, including building design and internal layout, site layout, public realm and the provision of transport infrastructure, must prioritise practical, safe and convenient access and use by sustainable transport modes, namely walking, cycling and public transport. Private vehicle use will be restricted in Islington as far as possible, as it is not sustainable and is a key cause of emissions and congestion.
- C. Freight, logistics and delivery vehicles may be acceptable forms of vehicular transport to enable the functioning of development where appropriate, according to the principles and requirements set out in this policy.
- D. All new development will be car-free, which will contribute to the strategic aim for a modal shift to sustainable transport modes. Private motor vehicles, including electric vehicles, motorcycles and taxis, will not be accommodated as part of new development in the borough and are not a priority form of transport.
- E. Transport developments are encouraged to adopt a design-led approach to recognise the role of streets as places.

7.1 Increases in Islington's resident and working population suggests that demand for transport - both within and through Islington - will continue to be a significant issue for the Local Plan to address in terms of the location of development and its integration with cycling, walking and public transport infrastructure. Consideration of transport and land use together, at the earliest possible stage of a development proposal, could contribute to a reduction in travel distances and thus a reduction in traffic congestion and pollution. The cumulative effect of new development may not on its own make a significant difference to overall levels of movement over the plan period, but when combined with movements associated with existing development there could be a significant impact, which must be assessed fully. Improving integration of transport and land use also encourages efficient use of space which is more conducive to modes of transport such as walking, cycling and public transport.

7.2 To allow for proper consideration of the transport impacts of a development proposal, applicants are required to include the submission of either a Transport Assessment and Travel Plan, or a Transport Statement and Local Level Travel Plan, in line with the

thresholds set out in Appendix 3. Travel plans must reflect the council's priority sustainable transport modes and support active travel. The submitted information is required to be sufficiently detailed and accurate to enable the council to fully assess the development proposal. This may include traffic modelling to demonstrate that development proposals will not have an impact (individually or cumulatively) on the flow of traffic. A road safety audit/assessment may also be necessary on specific schemes. The Travel Plan / Local Level Travel Plan should inform other documentation submitted as part of a planning application, including Design and Access Statements, as part of a holistic approach to ensure that inclusive or specific transport options are available to meet the needs of all users, including disabled people.

- 7.3 Islington is extremely well connected in terms of public transport. Many areas of Islington have a PTAL rating of 6a or 6b (the highest possible rating) meaning that the vast majority of the borough has superb public transport connectivity and frequency of service. However, PTAL ratings do not take account of the accessibility of public transport options, which means that the needs of certain transport users, particularly those with mobility, sensory or cognitive impairments, may not be factored in. It is vitally important that specific measures are put in place to enable that these users have easy access to the transport network.
- 7.4 All proposals must promote the development of active and inclusive environments that provide safe opportunities for everyone, specifically the most vulnerable users, to be physically active through sustainable modes of travel. The needs of people walking to, around and from developments are the most important influence on scheme and public realm design, as every user of a building or the public realm use footways as the first and last part of their trip, regardless of whether another mode has been used for the larger part. Cycling has significant public health benefits, both strategic – for example, by not exacerbating already poor air quality – and individual – for example, by promoting healthy physical activity. Increased cycling can also ease the strain on the rest of the transport network through reduced road and rail congestion. By taking a strategic approach to promoting cycling, Islington aim to improve circumstances for existing cyclists but also to incentivise new cyclists. In both cases, this necessitates provision of safe, convenient infrastructure.
- 7.5 Well-functioning public transport is essential to the sustainable development of the borough. The growing population, and projected economic growth across Islington and London puts great pressures on public transport infrastructure, some of which is already extremely congested.
- 7.6 The strategic objective of the car free policy is that Islington will be able to maintain a pro-active approach to development in order to meet housing need and facilitate jobs growth without an unacceptable worsening of air pollution, road congestion, noise and road safety. The policy aims to decouple development from traffic generation, changing the mode of spatial development from car-based to walking, cycling and public transport oriented development. Parking within the curtilage of residential properties has negative impacts on biodiversity, flood risk, visual amenity, healthy lifestyles, air quality, traffic congestion and highways safety. Such applications will normally be refused; however, the needs of disabled people will be taken into account and exceptions may be made where appropriate.
- 7.7 The rise of app-based, on-demand mobility has been rapid, and dramatic. However, on-demand mobility apps are not considered to be a substitute for public transport, as they can never move the same volume of passengers around a city nearly as efficiently or effectively. Furthermore, quality and continuity of service, universal

availability and equality of access cannot be guaranteed by privately-provided, unregulated services. The contribution of car-based on-demand mobility apps also increases the number of motor vehicles on London's roads.

- 7.8 While it is important to provide movement along a street, considering other functions is essential to create a sense of place and achieve a fulfilling environment which people enjoy to inhabit, walk, meet and cycle. A design-led approach is key to achieving new standards of excellence and recognising the fundamental and various roles of streets. It can also help in reducing the dominance of the vehicle and ensure slower vehicle speed and safer driver behaviours. Changing the road width, junction design and appropriate use of surface material are some examples of these design tools. A design-led approach can also help in meeting the ten indicators of the Mayor of London's Healthy Streets approach which aims to improve health and encourage active travel modes. New development will be required to contribute to the borough's sense of social, mental and physical wellbeing by supporting social and community infrastructure provision. This may involve financial contributions secured through CIL and (where appropriate) planning obligations; or on-site provision at larger developments.
- 7.9 The council will work with different stakeholders including Transport for London (TfL), London Underground, bus operators, developers, Crossrail 2, to deliver mutually beneficial schemes. With regard to TfL, the Council will work in partnership to deliver the aspirations on healthy streets/liveable neighbourhoods set out in the Mayor's Transport Strategy. The Council will also work closely with TfL to deliver borough-level improvements to public transport, the public realm and cycling infrastructure.
- 7.10 Crossrail 2 is a new proposed railway linking the national rail network in Surrey and Hertfordshire via an underground tunnel through London and Islington, with a station being planned in Angel. It is not yet funded but could be operational in the early 2030s, pending funding and relevant permissions. The Safeguarding Direction requires London Borough of Islington, as local planning authority, to consult TfL on planning applications it receives that fall within the boundaries shown on the safeguarding plans within the borough before granting planning permission. The Angel and Upper Street Spatial Strategy identifies sites that are safeguarded for the purpose of Crossrail 2.



## Policy T2: Sustainable Transport Choices

- A. Development proposals must demonstrate that negative impacts on the safe and efficient operation of sustainable transport infrastructure – e.g. the public realm, cycle lanes, bus routes/stops - are mitigated/prevented.
- B. All pedestrian and cycling infrastructure and facilities are required to be designed in accordance with relevant guidance and/or best practice standards.
- C. The use of “shared space” to jointly meet the needs of people walking and cycling is considered to be unsafe and inappropriate and will not be supported in new developments and/or public realm improvements.

### Walking

- D. All new developments in the borough must be designed to incentivise walking by:
  - (i) Delivering high quality public realm improvements that are secure, safe, legible, inclusive and create permeable environments;
  - (ii) Resisting proposals that have a negative effect on public realm;
  - (iii) Ensuring that pedestrian crossings are convenient and avoiding (where appropriate) complex and/or long pedestrian crossing and unnecessary pedestrian guardrails; and
  - (iv) Ensuring safe, convenient and continuous routes for pedestrians that follow desire lines and form networks.

### Cycling

- E. All new developments in the borough must be designed to incentivise cycling by:
  - (i) Ensuring safe, convenient and continuous routes for cyclists that follow desire lines and form networks
  - (ii) Demonstrating that there are no road safety conflicts between pedestrians, cyclists and vehicles entering, parking and/or servicing the development. Cyclist entrances to buildings, cycle stores and parking must be safe and convenient for all and cycle lanes should be demarcated from other pedestrian and road traffic.
  - (iii) Providing cycle parking in accordance with the minimum standards set out in Appendix 4.;
  - (iv) Providing inclusive and accessible end-of-trip facilities for cyclists, at a level proportionate to the size of the development and the required level of cycle parking.

### Public Transport

- F. The council will work in partnership with Transport for London, the bus and rail operators, developers and other relevant agencies/stakeholders in order to:
  - (i) implement measures to give buses priority over other vehicles (including continuous bus priority measures along whole route corridors);

- (ii) create and enhance the public realm around bus and rail stations to improve pedestrian/public transport user and cycling experience;
- (iii) develop the network of services to meet the travel needs of local residents and businesses; and
- (iv) ensure that bus stops and bus stopping areas are well located and designed, accessible and comfortable for all.

#### **Minimising the impact of non-sustainable transport modes**

- G. Developments which involve the ongoing use of private vehicles are likely to cause adverse impacts on the sustainable transport network and undermine the car-free policy aims to reduce congestion and vehicle emissions. Planning applications for developments involving the ongoing use of a private vehicle(s) – regardless of whether parking is provided in line with policy T3 - will only be approved where:
- (i) Clear and compelling evidence is provided to demonstrate that use of a vehicle(s) is essential for the use to function effectively (e.g. Use Class B8 storage and distribution uses);
  - (ii) the applicant can demonstrate that the transport impacts of the development have been satisfactorily mitigated, including consideration of potential for obstruction of the public realm and sustainable transport infrastructure;
  - (iii) it can be demonstrated that the use of private vehicles has been minimised; and
  - (iv) Opportunities for using more sustainable alternative modes of transport are maximised as part of the design of a proposal.

7.11 The Local Plan promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, reduce health impacts, respond to congestion affecting roads and public transport, and promote healthier lifestyles. Walking is a priority mode of transport; development proposals should be designed from the outset to facilitate walking to and from the development, in line with the council's Inclusive Landscape Design SPD and Streetbook SPD.

7.12 "Shared space" (single space) schemes involve removal of public realm features such as kerbs, road surface markings, designated crossing places and traffic signs. While they can lead to sustainable transport benefits, through the reduction of vehicle trips and increases in pedestrian and cycle usage, they also have inherent safety issues; in particular, vulnerable pedestrians such as visually, hearing and cognitively impaired people can find "shared space" schemes dangerous and difficult to navigate. "Shared space" schemes will therefore be resisted in Islington.

7.13 Pedestrian crossings should be designed to be convenient, accessible and inclusive for people to use. Staggered, long and complex crossing are considered unsuitable. This also includes avoiding the use of guard railing wherever appropriate. Road junctions should be designed to cater for the ease of crossing by all users.

7.14 As a borough on the edge of central London with a relatively flat topography, there is scope to improve cycle ridership levels in Islington. This could include road safety improvements such as vehicle/cycle segregation and the promotion of quiet and cleaner routes for walking and cycling. The Council will ensure that new development contributes effectively to enabling the borough's cycling potential to be met, in a way

that meets the needs of all residents and visitors. The Streetbook SPD provides further guidance on this.

- 7.15 The council supports cycling infrastructure improvements that adhere to guiding principles and achieve the good design outcomes set out in the London Cycling Design Standards. Transport for London's Strategic Cycling Analysis (SCA) 2017 has identified Kentish Town to Wood Green via Archway going up Junction Road, and Camden Town to Tottenham Hale via Nag's Head on Seven Sisters Road as two of their top priority cycling connection routes with the greatest potential for shifting journeys towards cycling. The SCA recommends further study to investigate potential improvements
- 7.16 All transport schemes and infrastructure should provide holistic benefits and provide safe, practical transport solutions for all sustainable modes. They should incentivise use from range of users and remove barriers to use as far as possible.
- 7.17 The lack of secure and accessible cycle parking is commonly recognised as one of the main barriers to cycling. Cycle parking – including accessible cycle parking spaces for mobility bicycles and tricycles, for cyclists with disabilities, as well bicycles for parents with children - should be provided as part of development proposals, including, but not limited to, uses within the A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), B1 (offices), D1 (non-residential institutions) and D2 (assembly and leisure) Use Classes. Parking provision (including visitor parking) must be provided in line with Appendix 4.
- 7.18 Accessible cycle parking requirements are set out in Appendix 4. Accessible cycle parking spaces shall be served by a route at least 1,500mm in width, alongside the rack, enabling the user to wheel their cycle into place. Spaces shall be wider than standard cycle parking spaces. Such spaces could be provided at the end of a rack of cycle parking. This ensures that cycle parking is inclusive and accessible for all and can accommodate a variety of devices such as tricycles and cargo bikes. Cycle parking suitable for families should also be provided for family sized homes. This may include parking that can accommodate trailers/cargo bikes for children. End of trip facilities such as showers and changing facilities are essential in order to promote cycling as a legitimate mode of transport, especially for travel to workplaces.
- 7.19 Dockless bike schemes have potential benefits in terms of increasing cycle patronage, but they often lead to significant street clutter and obstruction of pedestrian routes. Without greater oversight and control of dockless bike storage, such schemes will not be supported.

### **Policy T3: Car-free development**

A. All new development will be car free.

Residential Parking (including C3 and non-C3 residential use)

B. Applications for vehicle parking within the planning unit or within the curtilage of existing residential properties will be refused; this includes any undercroft or basement parking. No provision for vehicle parking or waiting will be allowed for new

homes, except for essential drop-off and wheelchair-accessible parking. Unless exceptional circumstances can be demonstrated, no parking permits will be issued to occupiers of these new homes.

#### Non-Residential Parking

- C. Parking will only be allowed for non-residential developments where this is essential for operational requirements and therefore integral to the nature of the business or service (e.g. Use Class B8 storage and distribution uses). In such cases, parking will only be permitted where an essential need has been demonstrated to the satisfaction of the council and where the provision of parking would not conflict with other council policies. Normal staff parking will not be considered essential and will not be permitted.
- D. Essential drop-off or essential operational parking considered acceptable in line with Parts B or C should:
  - (i) Be off-street and located to be accessible and convenient in relation to the development;
  - (ii) provide an accessible route from the parking space to the development; and
  - (iii) Provide electric vehicle charging points.
- E. Where on-street drop-off or other essential parking is proposed, details must be submitted to demonstrate the need for on-street provision and to show that arrangements will be safe and will not cause a traffic obstruction or nuisance. Electric vehicle charging points should be provided. Such charging points must be located within the parking space or carriageway and should not obstruct pavements or cause other adverse public realm impacts.
- F. Planning applications for uses that require coach parking ancillary to another use will not be permitted where the coach parking would give rise to adverse impacts on road safety and congestion. Coach parking should be provided on-site, unless the applicant can identify an alternative location which satisfies the council in terms of road safety and congestion and other relevant planning matters.

#### Wheelchair accessible car parking

- G. The council will expect the maximum provision of disabled parking bays provided in accordance with best practice standards, as set out in the council's Planning Obligations SPD and Inclusive Design SPD, and BS8300:2009. The council will require accessible parking bays to be located on-street where practical; such spaces should be identified and the cost of provision secured by a Section 106 legal agreement to enable the council to install the accessible parking spaces.

#### Car Clubs

- H. The council will support the provision of car clubs, including the provision of wheelchair accessible car club parking bays and/or contributions towards the provision of car clubs in the vicinity of the development, where appropriate. Car club vehicles should be 'clean', i.e. it should be powered by alternative fuels to minimise harmful impacts on the environment.

#### Car Parks

- I. Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Redevelopment of existing car parks is strongly encouraged. Proposals for the redevelopment of existing car parks (public or private) for a different use shall be subject to the car-free restriction within this policy. The artificial separation of sites to remove existing on-site parking areas (public or private) from the boundary of an application for the purposes of retaining car parking spaces will not be considered acceptable. All parking related to the existing use and/or building which is the subject of the application should be included as part of the application site.

#### Electric vehicles

- J. Electric vehicles are not exempt from the car-free policy. However, the council will require the provision of on-street charging points for vehicles where any parking is provided.

- 7.20 Motorised road transport generates congestion, pollution, noise and can compromise road safety for users of sustainable mode of transport. In Islington, these issues are further intensified due to the high population density and its central location in London. The only effective way of preventing adverse impacts associated with motorised road transport is to remove cars from the road while increasing the volume and attractiveness of other sustainable modes. The projected advancement of electric and/or autonomous vehicles is not a solution to these issues, as they still take up physical space on the road and therefore can lead to a number of the same adverse impacts as physically operated vehicles.
- 7.21 Islington's car-free development policy applies borough-wide and aims to reduce the dominance of cars in the borough while also achieving a reduction in vehicle pollutants, particularly nitrous oxides (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Car-free development means that no parking provision will be allowed on site and occupiers will not have the ability to obtain parking permits, except for required wheelchair accessible parking. The car free policy will apply to any residential development within C3 or non-C3 Use Classes (and land within the curtilage of such development). For avoidance of doubt, it applies to any residential use created through new build, change of use, conversion and/or subdivision of existing residential properties. Where appropriate, parking provision for essential drop-off and operational parking (for non-residential uses) may be permitted. Other motor vehicles such as vans, lorries and motorcycles are covered by the term 'car free'.
- 7.22 Some residents moving into car-free homes might face exceptional circumstances, in particular, existing social housing residents with a parking permit, who move to different accommodation or return to a site after the development has been completed (such as with estate redevelopment). In such circumstances, occupiers may be allowed the right to keep a parking permit.
- 7.23 Accessible transport initiatives may include the provision of wheelchair accessible parking, and a range of inclusive alternatives. On-street wheelchair accessible parking is encouraged, where appropriate, in preference to on-site spaces. For major residential development, one on-street parking place for each wheelchair accessible dwelling should be provided. For employment uses, one on-street parking place for every 33 employees must be provided. For other uses, the number of accessible bays should be proportionate to the number of building users. These parking bays should only be activated when a dwelling is occupied by a disabled driver or a disabled driver

is employed. When not activated, the council will support and encourage temporary use of bays for other uses such as parklets or cycle storage.

- 7.24 In conjunction with the Council's Highways team, the developer shall identify, negotiate and pay for the conversion of suitable bays. The amount payable will be determined based on a standard cost of conversion. Where there is insufficient space to accommodate on-street or on-site spaces, a financial contribution shall be made towards investment in other accessible transport initiatives where appropriate, for example contributions to fund a Taxicard scheme for transport users with mobility and/or sight impairments. Further information is set out in the Planning Obligations (Section 106) SPD.
- 7.25 Car clubs provide an alternative to car ownership that helps to reduce traffic and parking congestion, reduce air pollution and climate change impacts from transport, allows more equitable and efficient use of public space and increase travel options for all social groups, particularly helpful for families. Car clubs support the Council's car free policy and help to mitigate the transport impacts of a development compared with private car ownership.
- 7.26 The redevelopment of existing car parks, for alternative uses, will be subject to the car free policy. The number of car parking spaces existing on-site will not be accepted as a justification to provide car parking in contravention to the car-free policy, or to provide delivery, servicing, drop-off and wheelchair accessible parking above requirements identified in the submitted Transport Assessment and agreed by the council. The artificial separation of sites to remove existing on-site parking areas from the boundary of an application for the purposes of retaining car parking spaces will not be considered acceptable. All parking related to the existing use and/or building which is the subject of the application should be included as part of the application site.
- 7.27 Electric vehicles are not a priority mode of transport; they are preferable to petrol/diesel vehicles but still rank significantly below walking, cycling and public transport. Parking for electric vehicle are subject to car-free policy. Where use of motor vehicles is unavoidable, such as for deliveries, the council encourages use of electric vehicles. The electricity generation grid is not yet decarbonised although a transition to renewable energy is under way, so the carbon footprint of electric vehicles is reducing. More importantly however, the scarcity of road space mean the effects of congestion cannot be mitigated which justifies the council's clear priority for walking, cycling and public transport as priority modes of travel.
- 7.28 The council is facilitating the provision of electric vehicle charging points, as well as helping car club operators to achieve a diesel free fleet and enabling the electrification of the borough wide car club network. Where parking is provided, for example, wheelchair accessible parking, car clubs and parking for essential operational needs, electric vehicle charging points should be provided, to help facilitate move away from petrol and diesel powered vehicles. Charging points should be provided within the parking space itself to minimise street clutter and avoid impacts on the pedestrian environment; there may be exceptions where charging points are incorporated into existing street furniture – e.g. lampposts – and adverse impacts on the public realm can be fully prevented. The council's Streetbook SPD will be used to assess the impacts of new electric vehicle charging points on the pedestrian environment.

## Policy T4: Public realm

- A. All development proposals should engage positively with the public realm and should ensure that the public realm:
  - (i) Is permeable and legible;
  - (ii) Provides for the safety and convenience of all users, including those with mobility, sensory and or cognitive impairments;
  - (iii) Increases natural surveillance, including through the provision of adequate lighting;
  - (iv) Contributes to the quality and quantity of green infrastructure; and
  - (v) Promotes positive behaviours and social activities and encourages a diverse range of users to make use of space and facilities available.
- B. Any remodelling of the public realm and/or streets, through a stand-alone proposal or as part of a wider development proposal, should be based on a contextual appraisal and the findings of a route:place analysis. All proposals must be designed in accordance with the Streetbook SPD and should maximise opportunities to deliver other policy objectives.
- C. Street surface material(s) must:
  - (i) be smooth, durable and non-slip in all weather conditions;
  - (ii) be permeable to avoid exacerbating flood risk;
  - (iii) be contextual and reflect and enhance the character of particular areas; and
  - (iv) enhance the quality of the surrounding architecture.
- D. Privately Owned Public Spaces ('POPS') must provide a detailed management plan which sets out how the space will be used and managed. Management plans must detail how the space can be utilised by a range of users, including with protected characteristics; and how the space contributes to mixed and balanced communities. POPS must operate indistinguishably from public space. Adherence to management plans will be secured through legal agreement.
- E. Free, publicly available provision of unisex accessible toilet, baby change and drinking water facilities should be provided within easy reach of any new or enhanced public realm where users are encouraged to dwell.
- F. Design of the public realm must take into account Hostile Vehicle Mitigation measures, ensuring that the correct level of protection is provided without imposing unnecessary restrictions on people using the public realm in the area.

7.29 The success of any development within the public realm depends largely on how it relates to and fits within its wider context. Development proposals must provide a contextual appraisal, proportionate to the scale of the development. The appraisal should inform the design of the site, and will provide a critical reference point throughout the design process and ensure public realm elements are fully integrated to all proposals for the earliest stages. Proposals which do not engage proactively with

the public realm and explore opportunities for improvements/better links will be resisted.

- 7.30 To analyse the character, qualities and potential of public realm, a Route:Place analysis should be conducted as part of the contextual appraisal. This analysis provides references to classify streets according to their place and movement qualities. A useful starting point is to consider where the public realm or street in question are currently located on Route:Place spectrum and where they should more appropriately sit. More guidance on the Route:Place analysis is provided in the Streetbook SPD.
- 7.31 Assessments of the public realm must be made in an inclusive manner. Tools such as the 'Pedestrian Environment Review System' (PERS) are a walking audit tool and can be very useful in assessing the quality of the public realm associated with a development. However, the methodology relies heavily on the auditor's professional judgement. Therefore, any such study is backed up by objective reference to recognised standards, as agreed with the council on a case-by-case basis.
- 7.32 In line with policy T2, the use of 'shared space' is resisted. 'Shared space' does not meet the policy criteria set out in policy T4, particularly in relation to ensuring the safety, legibility and convenience of all users of the public realm, including those with mobility, sensory and or cognitive impairments. Where cyclists share pedestrian areas in the public realm, the cycle route should be clearly identified by a raised delineator and at the very least finished with a surface treatment of a contrasting tone.
- 7.33 The privatisation and commercialisation of public space will be resisted. Privately Owned Public Spaces ('POPS') are publicly accessible spaces which are provided and maintained by private landowners. These spaces should provide free entry and may be open 24 hours, or have restricted access arrangements. Even though the spaces have public qualities, such as free entry and 24-hour access, there are often constraints to their use.
- 7.34 Where POPS form part of a development proposal, a detailed management plan must be provided which sets out how the space will be used and managed. POPS should operate as de facto public space open to all groups; it should not exclude specific groups of users. The terms and conditions of their management and activities allowed will be defined case by case through the submission of management plans. These management plan will be secured through legal agreement.
- 7.35 Hostile/defensive architecture involves various forms of design intended to deter certain groups from using a space. Proposals that include hostile/defensive architecture and unpleasant design are not consistent with the council's fairness agenda and will be resisted. Public realm developments, including spaces outside public buildings, should incorporate Hostile Vehicle Mitigation measures at an early stage of the design process, instead of being retro-fitted. Applicants should engage with the council and Metropolitan Police at the earliest possible stage of the proposal, for guidance on counterterrorism measures for public projects, including open spaces. A risk assessment should be submitted as part of a planning application, which should include an assessment of the risk of structural damage from an attack; identification of measures to minimise any risk; and how the perimeter is treated, including glazing. Such measures should be considered in light of all other policy requirements, including inclusive design requirements.
- 7.36 Free, publicly available provision of unisex accessible toilet, baby change and drinking water facilities should be provided within easy reach of any new or enhanced public



realm. Publicly accessible, standalone toilets and baby change facilities are preferred, and these should be independently managed and policed, including details of maintenance (including any commitment for ongoing funding of maintenance). However, where such facilities are not practical (for example if other public realm functions and/or the amount of available space leave no scope for new facilities), access to toilets and baby change facilities may be provided as part of a Community Toilet Scheme. Such alternative provision will only be acceptable where there are firm guarantees that provision will be available in perpetuity, without restrictions (such as that provided in the City of London, Camden or Richmond).

- 7.37 With regard to drinking water facilities, successful schemes such as Refill London could be utilised in lieu of specific provision of new drinking water fountains. Any alternative provision will need to be fully accessible without restrictions and in perpetuity.
- 7.38 Streets, whatever scale, character, status and or state of repair can be defined in terms of their qualities as a place in which to dwell and a route by which to travel. Streets should form convenient, legible, continuous and adequately lit routes for pedestrian and cyclists that follow desire lines and form networks.
- 7.39 A coordinated and multi-functional approach to street furniture leads to better street design, for instance by combining signage and lighting or better locating street furniture to fulfil its intended use and improve the legibility and quality of the streetscape and increase the quantity of pedestrian spaces. Poor design creates obstruction, clutter, unwelcoming and unsafe environments.
- 7.40 Street design can also improve pedestrian safety by reducing traffic speed and encouraging safer driving, for example by changing the road width, junction design and appropriate use of surface material.
- 7.41 Introducing more trees and greenery creates more attractive streets and public spaces, increases biodiversity and helps to mitigate the impacts of climate change and air pollution. This includes planted curb extensions, sidewalk planters, landscaped central reservations, vegetated swales, permeable paving, and street trees. Provision of green infrastructure should be balanced against the Local Plan inclusive design policies.
- 7.42 Further guidance on street design is provided in the Inclusive Landscape Design SPD, Streetbook SPD and the Inclusive Design in Islington SPD.

## **Policy T5: Delivery, servicing and construction**

- A. Delivery and Servicing Plans (DSPs) will be required for developments that may impact on the operation of the public highway, private roads, the public realm and/or the amenity of residents and businesses, by virtue of likely vehicle movements. These plans should demonstrate how any potential impacts will be mitigated. DSPs will be required to assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. Use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged.
- B. Proposed delivery and servicing arrangements must:

- (i) Be provided off street wherever feasible, particularly for commercial developments over 200sqm gross floor area;
  - (ii) make optimal use of development sites;
  - (iii) demonstrate that servicing and delivery vehicles can enter and exit the site in forward gear;
  - (iv) submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles;
  - (v) provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose;
  - (vi) ensure that there are no adverse impacts on existing/proposed refuse and recycling facilities;
  - (vii) Ensure that the cumulative impact on sustainable transport modes is identified and suitably mitigated/prevented; this should include consideration of delivery and servicing requirements of existing, planned and potential development in the area, particularly in Town Centres;
  - (viii) Investigate potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycle, and 'clean' vehicles.
- C. For major developments, details of refuse and recycling collection must be submitted, indicating locations for collection vehicles to wait and locations of refuse and recycling bin stores.
- D. Development proposals in the vicinity of, or located on key routes connecting to, Locally Significant Industrial Sites must demonstrate that they have considered any impacts on logistics and transport movements that are integral to the continued industrial function of these areas.
- E. Where on street servicing is provided, details must be submitted to demonstrate the need for on street provision and that off street provision is not practical, and to show arrangements will be safe and will not cause traffic obstruction or nuisance. Traffic modelling may be required, such as TRAVL (Trip Rate Assessment Valid for London).
- F. Major residential developments must demonstrate that adequate provision can be made for delivery vehicles servicing residents. Delivery storage facilities should be provided such as secure unattended or concierge managed delivery facilities.
- G. Developments should adhere to best practice construction techniques to limit impacts on air quality and reduce noise and vibrations from construction, and the transportation of construction waste.

- 7.43 Full details of delivery and servicing are required for development that may impact on roads. Impact will be considered based on transport assessment submitted with application. The following information should be included where relevant:
- delivery hours;
  - delivery frequency;
  - service bay location;
  - service bay operation (including swept path analysis), and
  - size of servicing vehicles
- 7.44 For commercial developments over 200sqm gross floor area on-street servicing will only be allowed where it has been demonstrated that it would not be possible to provide servicing on site due to site constraints/quality of scheme, and / or highways safety issues can be demonstrated and agreed with the Council. Evidence that on-street servicing can operate effectively without impacts on highways safety, capacity or congestion will be required. The servicing and loading arrangements of the existing or previous use will not be taken into account. Where delivery and servicing arrangements include private vehicles, preference should be given to light goods vehicles under 3.5 tonnes. Vehicles weighing more than 3.5 tonnes are more likely to cause adverse impacts for the local road network and public realm.
- 7.45 The council will encourage local businesses to avoid peak hours for delivery and servicing, for instance through local voluntary agreements, such as servicing and delivery bonds. When feasible, deliveries should not take place during peak hours.
- 7.46 Development should adhere to relevant best practice standards and safety requirements such as the Fleet Operator Recognition Scheme (FORS) and the Construction Logistics and Community Safety (CLOCS) programmes will be strengthened.
- 7.47 Servicing on bus lanes will not be supported and rear access arrangements will be expected. The council will, where appropriate, control aspects of servicing by condition and / or planning obligation, for instance where servicing arrangements are located close to a bus stop or an entrance to a train station.
- 7.48 The council expects that all development complies with the best practice for construction, delivery and servicing, including the Islington Code of Practice for Construction Sites. The council expect developments to adopt the best practice construction techniques to reduce noise and vibrations from construction, and the transportation of construction waste and rubble out of London via rail instead of lorry. This includes TfL's Code of Construction Practice.
- 7.49 Development proposals should demonstrate how emissions from the demolition and construction of buildings will be reduced following the council's Code of Construction Practice, and how they will comply with the Non-Road Mobile Machinery Low Emission Zone where applicable

# 8 Design and Heritage

## Policy DH1: Fostering innovation while protecting heritage

- A. Islington support innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously limiting any adverse heritage impacts and protecting and enhancing the unique character of the borough. In this context, an innovative approach is one that contributes to the delivery of the Local Plan objectives, including making the borough an inclusive and resilient place by ensuring the design of buildings meets contemporary standards, the needs of all users and mitigates against the impacts of climate change.
- B. Islington is a diverse place of many different areas which give the borough its character. Development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design. The council intends to develop design codes for some parts of the borough to provide clear design guidance for development in those areas.
- C. All developments must be designed to be:
  - (i) Contextual: relate to and fit within its wider context;
  - (ii) Connected: connect with its surroundings and integrate with the urban context and natural environment;
  - (iii) Sustainable: deliver sustainable development, considering social, environmental and economic elements jointly and simultaneously, guiding development towards sustainable solutions; and
  - (iv) Inclusive: place people at the heart of the design process, enhance our spaces and create places that are logical, safe and legible; and ensure their continuing relevance and minimise the need for awkward, costly and unsightly alteration in the future. Inclusive design should ensure 'ease of use' and versatility.
- D. All views – strategic, local and local landmarks – must be protected and enhanced.
- E. The Council will preserve or enhance Islington's heritage assets – both designated and non-designated - and their settings in a manner appropriate to their significance, including conservation areas, listed buildings, archaeological priority areas, scheduled monuments, registered historic parks and gardens, London Squares and other heritage landscapes, and locally listed heritage assets and shopfronts.
- F. Site potential for development and site density levels must be optimised, in order to make the best use of the scarce land resource in the borough. High density does not automatically mean buildings need to be tall. The design of development should create a liveable, human scale and massing. It is expected that the vast majority of new development, particularly residential, will be accommodated in mid-rise buildings.

- G. Tall buildings can help make best use of land by optimising the amount of development on a site, but they can also have significant adverse impacts due to their scale and various associated impacts. Tall building locations must be carefully managed and restricted to specific sites where their impacts can be managed through appropriate design.
- H. Basement development can contribute to accommodating needs, for instance growing families, but they can also have significant adverse impacts on neighbouring properties and the wider area. Any development involving basements will be strictly controlled.
- I. The agent-of-change principle ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely impacted, including through noise and vibration impacts. This principle will apply to all development proposals in the borough, and can include consideration of a wide range of planning issues, including compatibility of land uses and design.

- 8.1 Islington is a diverse place of many different areas which give the borough its character. This includes a rich mix of buildings and spaces with heritage value, which are often coterminous with the boroughs many conservation areas. These areas should be protected in order to retain the elements that make them unique.
- 8.2 However, protection does not automatically equate to preservation. It is also about enhancement, ensuring that places are designed well and can deliver holistic benefits and improve health and wellbeing in the borough. High quality architecture and urban design are the tools through which healthier, safer and more inclusive places – where the built environment is also enhanced and protected - can be created.
- 8.3 The historic environment is generally defined as anything in our environment resulting from past human activity. Islington's historic environment is highly valued and is a key element of the borough's character, attractiveness, and success. There are numerous heritage assets that contribute to this; around half of Islington is designated as a conservation area and it is also home to approximately 4,500 listed buildings alongside numerous other assets. However, Islington also has significant need for new development, particularly housing and business floorspace, and also must maximise opportunities to mitigate the impacts of climate change. The need to ensure that development is inclusive and accessible to all, must also be taken into account.
- 8.4 Therefore, protection of the historic environment must be reconciled with the environmental, social and economic needs and aspirations of people who live and work in the borough. Character must evolve in order to accommodate these needs, and ultimately deliver the Local Plan objectives holistically. The Islington Urban Design Guide provides further guidance on the design principles which should inform new development.
- 8.5 However, this does not mean that heritage considerations are secondary to the need for new development. New development should, inter alia:
  - Be high quality and contextual, reflecting the valued aspects of local character, while allowing considered, appropriate increases in density and height (in line with policy DH2);

- Reinforce, and where possible positively contribute to, Islington's local character and distinctiveness. Applicants should work positively and proactively with all relevant stakeholders to understand the potential scope for maximising the potential positive contribution;
  - conserve and enhance the borough's heritage assets in a manner appropriate to their significance.
- 8.6 This does not mean simple mimicking of what is already there; pastiche development is not considered acceptable. Rather, it requires genuine engagement with the local context. Contemporary architecture and non-traditional materials can, in principle, make a positive contribution, although this will be assessed on a case-by-case basis. New development can also create new views and juxtapositions which add to the variety and texture of the setting.
- 8.7 The Local Plan requires development proposals to adhere to four key principles of design, ensuring that development is contextual, connected, sustainable and inclusive. These principles are integral to delivering good design and the creation of successful places, and should be considered and embedded in all development proposals from the outset. The Islington Urban Design Guide provides further detail on these principles.
- 8.8 Innovative development can help to achieve a positive contribution and make the best use of land in the borough. Innovation goes beyond mere aesthetics; it is fundamentally about how we can accommodate new development – particularly delivery of affordable housing and other priorities - through intensification, achieving versatility and injecting life into an area.
- 8.9 Creating liveable buildings of a human scale and massing, which accommodate high density development, is one way this could be achieved. It is expected that the vast majority of development will be accommodated in mid-rise buildings of eight to ten storeys<sup>31</sup>, rather than through delivery of countless high-rise towers across the borough. Mansion blocks provide high density development at a human scale and massing, but are often deficient in terms of meeting important design standards including space standards and inclusive design. A re-interpreted, modern take on mansion blocks which marries high density and human scale with provision of development of appropriate standards, is an innovative approach which could optimise development capacity while simultaneously enhancing the built environment.
- 8.10 Innovation could also include new architectural styles and techniques such as modular construction, which could have benefits in terms of design and construction costs and deliverability of sites.
- 8.11 Innovative development should also use physical form to provide solutions to issues which arise through the process of developing proposals, rather than relying on future management arrangements of specific buildings; shortcomings in the latter frequently places unreasonable and unsustainable demands on the former. An example of this includes emergency evacuation arrangements; all developments must be compartmentalised (installing fire breaks not only between floors but within floors so that all users can escape horizontally to a place of another part of the building), and/or include provision of evacuation lifts (in addition to any requirement for fire-fighting lifts)

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<sup>31</sup> Buildings which are 30 metres or more in height will trigger policy DH3 Part B.

that would provide a safe and secure evacuation route for mobility impaired individuals in an emergency.

- 8.12 The Council encourages innovative reuse of heritage assets, where adverse impacts can be prevented or mitigated; land use, regardless of the original use of the building, would not by itself be deemed harmful with regard to the impact on a heritage asset.
- 8.13 The council has commissioned a borough-wide characterisation study to provide an up-to-date and thorough understanding of the local character in various areas across the borough; and the potential development capacity that exists in these areas, taking into account a number of considerations including relevant heritage designations. The results of this work will be used to develop design codes (as advocated by the London Plan) for some parts of the borough to provide clear design guidance for development in those areas.
- 8.14 Applicants are encouraged to use Islington's Design Review Panel to provide constructive feedback on design proposals.

## **Policy DH2: Heritage assets**

- A. Planning applications must include a Heritage Statement which demonstrates a clear understanding of the significance of any relevant heritage assets; and details likely impacts on this significance which may be affected by proposals.
- B. Development within conservation areas and their settings – including alterations to existing buildings and new development - must conserve and enhance the significance of the area, and should be of a high quality. Proposals that harm the significance of a conservation area must provide a clear and convincing justification for the harm, commensurate to the level of harm proposed. Substantial harm to the significance of a conservation area will be strongly resisted.
- C. Buildings, spaces, views and other assets which make a positive contribution to a conservation area should be retained; this can include multiple assets which individually make a limited positive contribution, but cumulatively have a greater positive contribution.
- D. The significance of Islington's listed buildings and non-designated heritage assets (including locally listed buildings and shopfronts) and their settings should be conserved or enhanced.
- E. Proposals that harm the significance of a listed building or non-designated heritage asset (which includes development proposed within their settings) must provide a clear and convincing justification for the harm, commensurate to the level of harm proposed. Substantial harm to, or loss of, a listed building or non-designated heritage asset will be strongly resisted.
- F. Repair and reuse of listed buildings; non-designated heritage assets; and buildings and other assets which make a positive contribution to conservation areas is

encouraged, but must be justified and appropriate. Any scheme involving repair or reuse should maximise the quality of the building/asset.

- G. Historic green spaces are identified on the Policies Map. Developments within the setting of historic green spaces must ensure:
- (v) the conservation or enhancement of the spaces themselves, their setting and any important features;
  - (vi) that the enjoyment, layout, design, character, appearance or setting of spaces, and key views out from the landscape, is maintained or enhanced; and
  - (vii) that planned or potential future restoration is not prejudiced.
- H. There are a number of strategic and local views within and across Islington. These give important views of St. Paul's Cathedral and significant local landmarks and will be shown on the Policies Map<sup>32</sup>. All views – strategic, local and local landmarks – must be protected and enhanced. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. Development proposals must provide appropriate supporting material – including 3D modelling - to verify the visual impact of proposed development on protected views.
- I. Islington's Archaeological Priority Areas and scheduled monuments are identified on the Policies Map. Proposals which have the potential to affect archaeological remains and/or heritage assets of archaeological interest, particularly those within archaeological priority areas and/or in proximity to scheduled monuments and their curtilage, are required to include an Archaeological Assessment.
- J. Archaeological remains should be retained in situ. Where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings.

8.15 Islington's heritage assets add to the borough's character and distinctiveness. Listed buildings, conservation areas, historic green spaces, scheduled monuments and archaeological priority areas are all designated heritage assets. However, the term heritage asset includes any valued component of the historic environment; it is not limited to specific buildings and structures, and can include spaces, views and other assets which are positively identified as having a degree of significance meriting consideration in planning decisions.

8.16 Policy DH1 directs that protection of the historic environment should be reconciled with the environmental, social and economic needs and aspirations of people who live and work in the borough. However, this does not mean that heritage assets will be subject to a more laissez faire consent process; it is important to put in place strong criteria to ensure that these important assets are given due protection and allow for opportunities to enhance them

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<sup>32</sup> No changes to local or strategic views are envisaged as part of the Local Plan review. However, there are several corrections to current views mapping that needs to be undertaken. The next iteration of the draft Local Plan (Regulation 19) will include details of all views. Existing local and strategic views are shown on the current adopted Policies Map.



- 8.17 It is essential that all development is of a high quality, reflecting local context but also consistent with relevant design standards and requirements in the Local Plan. Development affecting listed buildings or other heritage assets (and within their settings), and/or within conservation areas, is expected to conserve or enhance the significance of the respective areas.
- 8.18 Significance of a heritage asset can be derived from various features including buildings, spaces, street patterns, views, vistas, uses, trees, and landscapes. Significance is more than simply historic fabric and appearance and may include the location, function and hierarchy of rooms, floor levels, and circulation routes. Issues to consider include impact on spatial quality, light levels and the relationship between spaces, both internal and external. Significance can be harmed by extension underground, loss of garden space or the infilling of a lightwell.
- 8.19 Development which causes harm to the significance of a heritage asset will require clear and convincing justification, commensurate to the level of harm proposed. Substantial harm to the significance of a heritage asset will be strongly resisted.
- 8.20 Justification of harm will be determined on a case-by-case basis but could include the following:
- The need to address other Local Plan policy requirements including, inter alia, affordable housing, affordable workspace, inclusive design and sustainability standards;
  - Issues relating to the use of the heritage asset, particularly where the nature of the asset itself prevents all reasonable uses of a site, for example due to significant restrictions on layout;
  - The asset is in a state of disrepair and there is no reasonable prospect of it being repaired. In such cases, applicants must demonstrate that they have exhausted all avenues to secure funding for the repair, including (but not limited to) seeking grant-funding and/or charitable donations.
- 8.21 Repair and re-use of buildings, spaces, views and other assets which make a positive contribution to conservation areas is strongly encouraged. Likewise, repair and re-use of listed buildings and non-designated heritage assets is encouraged but must be justified and appropriate. Ad hoc, piecemeal works to assets should collectively add up to a positive contribution over time, and should avoid adverse cumulative impacts on significance. Numerous alterations which cause minor harm can, over time, add up to significant harm.
- 8.22 In all cases, repair and re-use should maximise the quality of the building/asset, for example through inclusion of inclusive design and sustainability standards; and/or where it would help meet identified development needs in the borough. Regard should be had to relevant best practice and guidance including Historic England's Easy Access to Historic Buildings<sup>33</sup>.
- 8.23 Repairs, alterations or extensions to listed buildings should relate sensitively to the original building. Materials used for repairs, alterations or extensions should be compatible with those already used on the building. The use of non-traditional

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<sup>33</sup> Available from: <https://content.historicengland.org.uk/images-books/publications/easy-access-to-historic-buildings/heag010-easy-access-to-historic-buildings.pdf>

materials may be acceptable where they would not undermine the significance and/or structural integrity of the building.

- 8.24 The Council has prepared conservation area statements and design guidelines for all of the borough's conservation areas. Where relevant, this guidance will be updated to reflect changes to the areas over time. The Council has also set out guidance on the appropriate repair, alteration, or extension to listed buildings in the Islington Urban Design Guide Supplementary Planning Document. The council has a list of locally significant buildings and shopfronts which make a positive contribution to Islington's local character and distinctiveness.
- 8.25 The significance of individual elements of a listed building may vary and will be assessed on a case-by-case basis. However, the following are likely to have the potential to contribute to the significance of a listed building:
- External elevations including architectural detailing, roof forms, windows and doors,
  - External spaces and structures such as gardens, lightwells and boundary treatments,
  - Plan form including internal spaces, partitions, ceilings, floors, staircases and chimney breasts, and
  - Interior decoration including architectural detailing, chimneypieces, floor surfaces, joinery and plasterwork.
- 8.26 Historic fabric is an important part of a listed building's significance. Retention of as much historic fabric as possible should be the starting point of any proposals, together with the use of appropriate materials and methods of repair.
- 8.27 The Council will encourage the accurate reinstatement of lost original architectural detailing where it can be demonstrated that it will enhance the significance of a listed building and where it does not constrain other objectives of the Local Plan. In such cases the Council will require applicants to provide adequate information confirming the historic authenticity of the work proposed.
- 8.28 Frequently, later historic additions to listed buildings are of significance in their own right as part of the building's history. Generally, later fabric of significance should not be removed in order to restore a building to an earlier form. Sometimes modern fabric may be of significance. Examples include when a modern partition has replaced an historic partition and allows the original plan form to be legible and when a modern roof exactly replicates an original roof form.
- 8.29 Development which may also have an impact on the significance of heritage assets should take into account proportion, height, massing, bulk, materials, use, the relationship with adjacent heritage assets, alignment and general treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate.
- 8.30 Where the loss of the whole or part of a heritage asset is permitted the council will take all reasonable steps to ensure that the new development will proceed after the loss has occurred.
- 8.31 Historic green spaces - which for the purposes of this policy includes registered historic parks and gardens, London squares and other heritage landscapes – are shown and on the Policies Map. These spaces are derived from the London Parks and Gardens

Trust's Inventory of Historic Green Spaces. The Council will protect these spaces and their settings.

- 8.32 Archaeological priority areas<sup>34</sup> and scheduled monuments are identified on the Policies Map. All planning applications likely to affect important archaeological remains are required to include an Archaeological Assessment.
- 8.33 Archaeological remains should be retained in situ. Where this cannot be achieved measures must be taken to mitigate the impact of proposals through archaeological fieldwork to investigate and record remains in advance of works, and subsequent analysis, publication and dissemination of the findings.

### **Policy DH3: Building heights**

- A. Buildings of more than 30 metres, or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be considered to be tall buildings.
- B. Buildings of more than 30 metres are only acceptable in-principle:
- (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or
  - (ii) within specific sites identified in relevant spatial strategy policy.
- C. Each relevant allocation and/or spatial strategy policy identifies the maximum permissible heights suitable on the respective sites/locations. Any buildings proposed on these sites which exceed the identified maximum heights will be refused. Proposals for buildings of more than 30 metres are only acceptable where they fully satisfy the criteria identified in Part F.
- D. Proposals for buildings which are more than twice the contextual reference height of surrounding buildings, but less than 30 metres, are also classed as tall buildings and must fully satisfy criteria identified in Part F.
- E. Buildings that do not meet the criteria in Part A but which are still considered prominent in their prevailing context must respond appropriately to local contextual building heights, the character of the area and other relevant policies, and may be subject to Part F of this policy.
- F. All proposals for tall buildings must mitigate the individual and cumulative visual, functional and environmental impacts on the surrounding and wider context, and fully satisfy all the following criteria:

#### **Visual Impact**

<sup>34</sup> Historic England are currently undertaking work to update APAs. This work will inform final APA boundaries for the Regulation 19 Submission draft document.

- (i) Protect the legibility and identity of the area by creating a positive landmark within the townscape and creating a strong sense of place;
- (ii) Protect and enhance strategic and local views, and views to local landmarks;
- (iii) Conserve and, where appropriate, enhance the significance of designated and non-designated heritage assets and their settings, relative to their respective significance;
- (iv) Be proportionate and compatible to their surroundings and the physical character of the area;
- (v) Promote exceptional design, through high quality design details and material, positively contribute to the skyline and to the immediate locality, and having regard to any site-specific design principles set out in the relevant site allocations and/or spatial strategy area, and other relevant design policies
- (vi) Provide an appropriate transition from the taller section of a building to the lower volume relating to the streetscape and surrounding context and ensuring a human scale street level experience;

#### **Functional Impact**

- (vii) Not prejudice the ongoing functionality of sites in the local area; and/or the development potential of sites in the local area, taking into account the individual impact of the proposal and cumulative impacts of existing and permitted development in the area (all development not just tall buildings);
- (viii) Demonstrate how the building will operate and function to provide good levels of amenity for all building users, through provision of a detailed building management plan which details how the proposed building will operate in various circumstances, including emergency procedures. Plans should include information on peak time ingress and egress and the interaction with local and strategic infrastructure; delivery and servicing; vertical transportation; waste arrangements; emergency escape routes and other relevant building services.

#### **Environmental impact**

- (ix) Demonstrate that development does not adversely impact, either individually or cumulatively, on the microclimate of the surrounding area, including the proposal site and any public space in close proximity to the site. This may require submission of detailed assessments and/or modelling work; and
- (x) Demonstrate that development does not have any adverse individual or cumulative impacts on biodiversity, including watercourses and water bodies and their hydrology

8.34 Islington has relatively little available land for development – given the size and built-up nature of the borough - but faces intense pressure for development, particularly for residential and office uses. Mid-rise, high density development offers an opportunity to optimise development while providing a form of development at a human scale which is responsive to the prevailing contextual heights across much of the borough.

8.35 Tall buildings are substantially taller than their neighbours and can significantly change the skyline; they are often seen as an option to maximise development potential on a site. However, due to their scale and visibility, they can have a significant impact (both positive and negative) on a place, and as such must be subject to detailed scrutiny. They are not uniformly appropriate across the borough.

8.36 For the purposes of this policy, tall buildings are split into two classifications<sup>35</sup>:

- Buildings of more than 30 metres in height; or
- Buildings which are more than twice the contextual reference height of surrounding buildings<sup>36</sup>.

8.37 Buildings of more than 30 metres in height may be suitable:

- On sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or
- Within specific sites identified in relevant spatial strategy policies.

8.38 These sites have been informed by a detailed local urban design assessment which took into account a variety of considerations including public transport accessibility, topography, conservation areas, listed buildings, protected vistas and strategic views, to sieve out areas unsuitable for buildings of more than 30 metres in height.

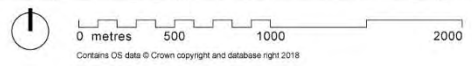
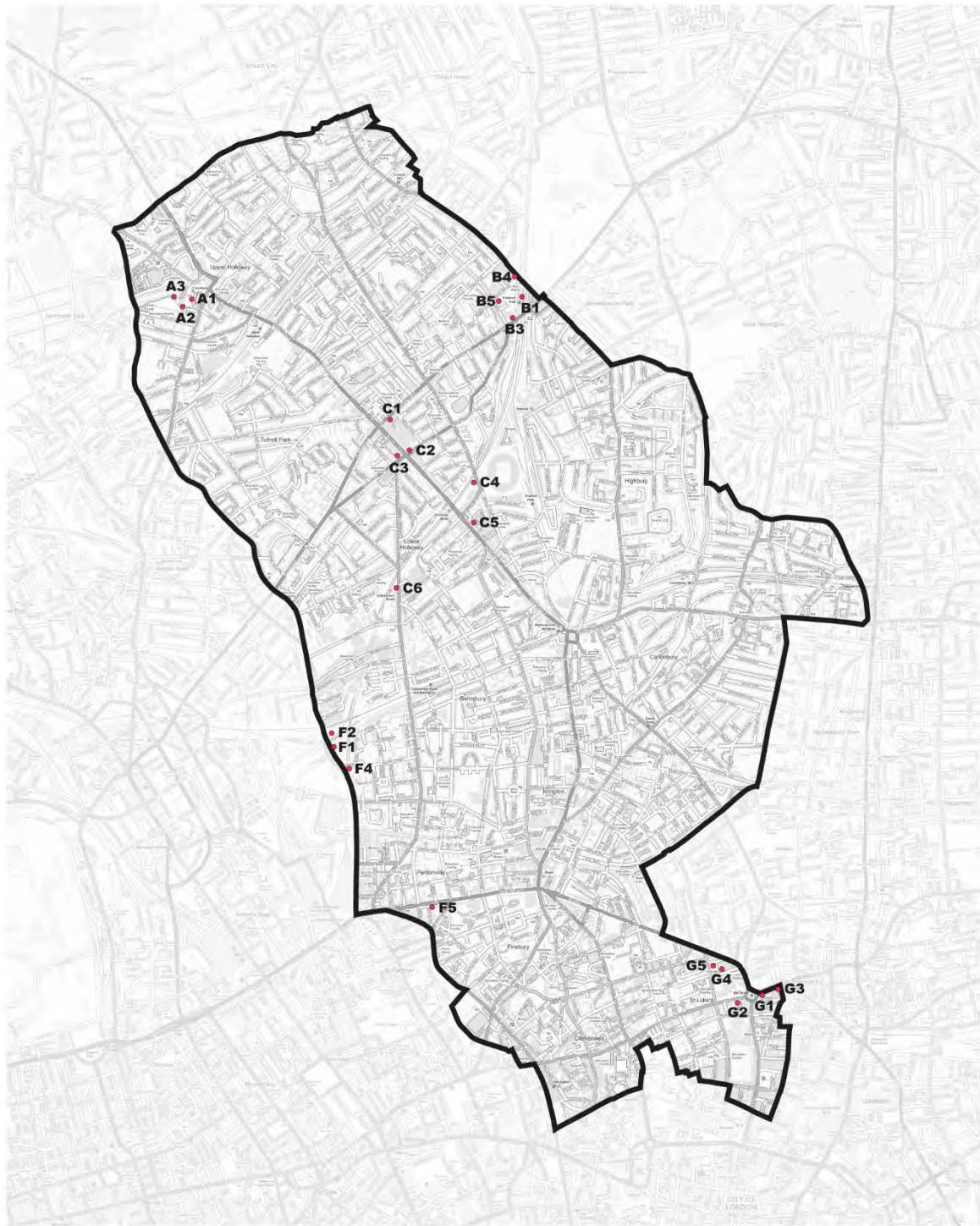
8.39 Figure 8.1 shows all locations which are suitable, in-principle, for buildings of more than 30 metres.

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<sup>35</sup> For both classifications, height should be measured to the tallest point of the building including any structures on the roof, e.g. telecommunications equipment, lift overruns, plant machinery.

<sup>36</sup> For avoidance of doubt, a building which is less than 30m but more than twice the contextual reference height of surrounding buildings would be classed as a tall building.

Figure 8.1: Locations suitable (in principle) for tall buildings over 30m



8.40 Maximum permissible heights for each location, as well as some site specific design principles, including guidance on siting of height within the context of the site/area boundary (where relevant), are set out in the relevant site allocation and/or spatial strategy policy. They are repeated in table 8.1 below, for reference:

**Table 8.1: Tall building site information**

<b>Spatial Strategy Area</b>	<b>Ref</b>	<b>Locati</b>	<b>Maximum Height</b>
<b>Archway</b>	A1	Hill Hose	Up to 52m
	A2	Vorleyoad Bus Station	40-46m
	A3	South end Macdonald Road	Up to 37m
<b>Finsbury Park</b>	B1	Finsbur Park Station	Up to 76m
	B3	221-233 Seven Sisters Road, Corner with Fonthill Road	40-46m
	B4	Wells errace East, Morris Place East, Yellow Car Wash site	40-46m
	B5	113-119 Fonthill Road and land to rear	Up to 37m
<b>Nag's Head and Holloway</b>	C1	8-32 Sen Sisters Road and backland on Hertslet Road	40-46m
	C2	372-376 Holloway Road at corner with Tollington Road (Argos	40-46m
	C3	379 – 391 Camden Road and 341 – 345 Holloway	Up to 37m
	C4	45 Horey Road	Up to 37m
	C5	Metritan University Tower on Holloway Road	Up to 76m
<b>N/A</b>	C6	Forme railway sidings adjacent and potentially including Caledoniodad Station	Up to 37m
<b>Kings Cross and Pentonville Road</b>	F1	Railwa land and Sub Station on York Way opposite student ing tower	Up to 61m
	F2	Railwa land between Overground and HS1 tracks, east of York W	40-46m
	F4	176-178 York Way, Car wash site	Up to 37m
	F5	Pentise Estate, corner Weston Rise with Pentonville Road	Up to 37m
<b>City Fringe Opportunity Area</b>	G1	Soutt corner Old St reet City Road junction -Inmarsat House	Up to 106m
	G2	Shell Sation site on Old Street	Up to 46m
	G3	Albertouse on Old Street	Up to 46m

		Moorfields Eye Hospital/UCL Site:	
	G4	Peerless Street, north of the junction with Baldwin St	Up to 70m
	G5	North West corner of the site, corner of Cayton Street /Bath Street	Up to 50m

8.41 Buildings that are below the 30m threshold and less than twice of the height of the prevailing context, but which can be considered prominent in their prevailing context, may be classed as tall buildings and, as a result, they may be subject to Part F policy DH3 dependent on site specific circumstances. In this case, the prevailing context height is not informed by the highest existing height in the surrounding built environment.

8.42 All proposals for tall buildings must consider the individual and cumulative visual, functional and environmental impact of the proposal:

- Visual impact – robust assessment of the visual impact of a tall building is essential to ensure that the proposal is appropriate for local area. This includes consideration of strategic and local views and heritage constraints. Location, form, proportion, height and expression of architecture are some of the other contributing factors that are imperative in creating tall buildings that perform a positive landmark role within the townscape. By ensuring all collective factors are met, tall buildings will be able to enhance the legibility of an area and contribute positively to its character and sense of place.
- Functional impact – tall buildings must operate efficiently in and of themselves, but also must fit seamlessly within the function of the local area. Full assessment of individual and cumulative impacts is essential to ascertain the true picture of functionality, thereby ensuring that adverse impacts are mitigated or prevented. Functionality will be the most tangible day-to-day issue for the future operation of a tall building, and issues can be hard to rectify in future; therefore, it is vitally important that this is dealt with prior to permission being granted.
- Environmental impact – due to their scale, tall buildings can cause adverse impacts on various elements of the local environment. They can create their own microclimate, with impacts from wind (and associated wind noise) being a common issue, and can cause localised (street-level) air pollution issues, especially where there are clusters of tall buildings which preclude dispersal of pollutants. Reflected solar glare, night time light pollution and overheating are some of the other issues associated with tall buildings that require further consideration.

8.43 Applicants will be required to provide sufficient information to enable the impact and planning merits of the tall building proposals to be properly assessed, including sufficient information on the detailed form and finishes of the building in order to properly assess its impact and design quality.



## Policy DH4: Basement development

- A. All basement development must be proportionate to its site and context.
- B. The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
  - (i) the structural stability of the existing building, nearby buildings, trees and any infrastructure;
  - (ii) the structural, ground, or water conditions of the area;
  - (iii) the architectural character of the building;
  - (iv) the character and amenity of the area; or
  - (v) the significance of heritage assets including conservation areas and listed buildings.
- C. The Council will require that developers provide evidence of the impact of basement development in the form of a Structural Method Statement, which satisfies the criteria in part B.
- D. For residential basement development (including extensions):
  - (i) A basement should cumulatively occupy less than 50% of the original garden and/or unbuilt area; or the area of a basement which is outside the footprint of the host building should total no more than 50% of the area of the footprint of the host building, whichever is the lesser.
  - (ii) A basement should not involve excavation of more than one (1) storey below the lowest original habitable floor level.
  - (iii) The height of a basement should not exceed 3m floor to ceiling height.
  - (iv) Lightwells and other external manifestations should be modest in size, discreetly located, and designed to protect and enhance the character and appearance of the area.
  - (v) Basements should be designed to preserve existing gardens, and should reinforce the visual relief soft landscaping between buildings provides.
  - (vi) Basements development should not significantly alter the prevailing garden level.

8.44 Basement development includes any excavation to form new or additional floorspace under the ground level (subterranean) of an existing property or within its curtilage and under its garden. It also includes basements which are part of new build development.

8.45 Basement development and other development that involves excavation changes the ground and water conditions of the area and can potentially lead to ground instability

or flooding. Basement development can also have significant construction impacts due to the need to remove spoil and the complexities of excavation. The Council recognises the need to protect the environment and adjoining neighbours' properties and buildings from these impacts.

- 8.46 Most basement developments will require planning permission but there may be certain circumstances where basement development may be 'permitted development' under the General Permitted Development Order 2015.
- 8.47 Islington has seen an increase in basement development caused by high land values coupled with limited opportunities for extensions above ground. In response to this development pressure the Council has produced the Basement Development Supplementary Planning Document which provides further guidance on the implementation of policy DH4.
- 8.48 Unlike above ground development, which traditionally has minimal impact on ground conditions and when removed the site can be restored to its (near) pre-development state, subterranean basements, particularly when greater than one storey in depth, can permanently and irreversibly alter ground conditions.
- 8.49 Basements must be designed to safeguard the structural stability of the existing building, nearby buildings, trees, and any infrastructure. For all basement development applicants must submit a Structural Method Statement (SMS) that has been prepared in accordance with the SMS requirements set out in the Islington Basement Development SPD. The SMS must be signed and endorsed by a Chartered Civil Engineer or Chartered Structural Engineer with relevant experience, appointed by the applicant.
- 8.50 The Council may choose to consult (at the expense of the applicant) an independent suitably qualified person to undertake an independent assessment for specific cases where substantive conflicting information has been presented to the Council, or where there are any particularly sensitive buildings, trees, or other structures within proximity of the site.
- 8.51 The design and size of basement should be proportionate and respond to the scale, function and character of the site and its surrounds, including the above ground portion of the building. Where large basement extensions are proposed, the resulting intensity of basement use may be out of keeping with the domestic scale, function, and character of its context. Basement development should not unduly intensify the use of a site, or cause significant environmental harm. Whilst modest basement extensions can in some circumstances be an effective way of creating additional floor space, the development of private open space to achieve additional floor area can give rise to a number of adverse impacts unless designed sensitively, including increased surface water flood risk, impacts on the borough's biodiversity and adaptation to climate change.
- 8.52 Basement development should cumulatively occupy less than 50% of the original garden or unbuilt area; or the area of a basement which is outside the footprint of the host building should total no more than 50% of the footprint of the host building, whichever is the lesser. The maximum extent will be measured separately for each garden or unbuilt area within the site, e.g. front, back, or side. The remaining area should be designed to maximise garden amenity and functionality. The siting of the basements should maximise the connectivity of neighbouring gardens and green spaces in the wider area to support green corridors and biodiversity, and enable surface water drainage and lateral ground water movement to occur between sites.

- 8.53 The depth of a basement can increase the impacts associated with basement construction including longer construction times, more excavation waste, greater potential to cause ground movement and ground water, as well as resulting in spaces with less natural light and ventilation. Basements should therefore generally not exceed 1 storey in depth, and not exceed 3m floor to ceiling height. A basement extension below an existing basement or lower ground floor (that is not an original feature of the building) that would result in a two storey basement and will be resisted.
- 8.54 For infill residential development, the scale and extent of basement within a site should respond to the site context and the prevailing scale of development in the area. Basements should be proportionate, subordinate to the above ground building element, and reflect the character of its surrounds. The proportion of the site that is built upon/under to the proportion unbuilt upon when compared with surrounding buildings is of particular importance to achieving a compatible scale of development on infill sites.
- 8.55 The siting of buildings and any associated basements should protect and enhance existing landscaped areas within the site, particularly where they contribute to the character of an area. The Council will require the inclusion of generous deep soil landscape and drainage margins that can support mature soft landscaping and sustainable drainage.
- 8.56 On commercial and mixed use redevelopment schemes with proposed basements, the extent of basement development should be commensurate to the site context and building design. Sites within commercial areas such as the Central Activities Zone often contain buildings built to boundary. Any basement component of the scheme should be designed to avoid adverse impacts to sensitive sites, building, trees and other structures that may be affected by the construction of the proposed development.
- 8.57 Proposals should provide satisfactory landscaping, maximise permeability, biodiversity value and sustainable drainage through the provision of soft landscaping and permeable surfacing, and appropriate planting.
- 8.58 Where basement comes within proximity to existing trees on the site or adjoining sites, trees should be retained and the basement should be designed to avoid any adverse impacts upon those trees. An Arboricultural Report should be submitted in accordance with BS5837:2012 for any such application.
- 8.59 Trees proposed on a site should be provided with sufficient rooting volumes and access to deep soil areas to ensure their long term survival and ability to reach maturity.
- 8.60 Unless within 3m of the original rear wall, any basement extending beyond the original footprint of a building should incorporate a minimum of 1m of soil plus 200mm drainage above the top cover of the basement. For particularly constrained sites, or where large trees are proposed, soil depth of up to 1.5m should be provided.
- 8.61 Lightwells and other external manifestations should be modest in size, discreetly located, and designed to protect and enhance the character and appearance of the area. Basements should be designed to preserve existing gardens.
- 8.62 Where rooflights are proposed, they should be kept flush with the ground level, be close to the building, proportionately small, and sympathetic with the host building. Rooflights that are located away from the building line such as in the middle of private

gardens can be visually harmful and when illuminated from below can result in light spillage and are generally unacceptable.

- 8.63 Other associated external manifestations of basements such as stairs, retaining structures and railings should be sensitively designed and discreetly sited so as to minimise the fragmentation of spaces, not contribute to visual clutter, or detract from the prevailing streetscape or garden pattern.
- 8.64 The demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. Many basement schemes are constructed in residential areas in close proximity to people's homes, with the construction works often involving significant disturbance (including removing significant quantities of soil) extending for many months.
- 8.65 Basement development must minimise construction impacts such as noise, vibration, and dust for the duration of the works. The Council will seek to minimise the disruption caused by basement development and will require Construction Management Plans to be submitted with applications.

### **Policy DH5: Agent-of-change, noise and vibration**

- A. Proposals for any new development – new build, extensions and conversions – in proximity to an existing use(s) which may be adversely impacted by the new use must follow the agent-of-change principle.
- B. Any potential adverse impacts which may arise due to new development being located close to sensitive uses must be fully prevented via the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact.
- C. If adverse impacts cannot be fully prevented, then proposals will normally be refused, unless non-physical measures - such as a Deed of Easement - are put in place which, in the council's view, would ensure there is no residual threat to the future operation of the existing use.
- D. All development proposals which have the potential to cause or exacerbate noise and vibration impacts on land uses and occupiers in the locality must fully assess such impacts, with reference to relevant noise thresholds set out in Appendix 2. All proposals should:
- (i) In the first instance, aim to prevent noise and vibration impacts occurring by siting uses which could cause or exacerbate impacts away from potentially affected uses; or, vice versa, siting sensitive uses away from uses which could cause noise and vibration impacts. An Acoustic Design Statement, in line with Appendix 2, should be provided to demonstrate satisfactory solutions; or
  - (ii) Where this is not possible, provide a detailed assessment of noise and vibration impacts in line with Appendix 2. Where noise and/or vibration impacts are identified suitable mitigation measures must be put in place to reduce these impacts, through the proposed layout (including the interaction of non-residential and residential uses in mixed use developments), design and

materials. If impacts cannot be mitigated, planning permission will not be granted.

- (iii) A Noise Management Plan will be required where mitigation of noise from behavioural sources is necessary.

- 8.66 Proposals for new noise sensitive development in proximity to an existing noise generating use such as cultural uses or night time economy must follow the 'agent-of-change' principle. Proximity is not specifically defined but would generally be any distance where vibration, noise (including airborne noise) and/or the operation of a use (such as regular ingress/egress routes) could cause amenity impacts on a proposed use. Proximity includes both external and internal impacts. Internal building impacts could be where conversion of existing floorspace within a mixed use building may need to consider an existing noise generating use in another part of the building. This is to ensure that any potential adverse impacts which would arise due to being located in the vicinity of noise generating use(s) are fully prevented via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of noise, vibration and other adverse impacts.
- 8.67 Where impacts are identified, they should be mitigated through good acoustic design measures such as proposed layout /design of a scheme, and through use of appropriate and effective materials (for example, in walls and floors) which dampen noise and vibration between and within dwellings, and between dwellings and public and/or communal areas. Layout in particular can be effective in mitigating impacts arising from mixed-use developments.
- 8.68 If the adverse impacts cannot be fully prevented, then proposals will normally be refused, unless non-physical measures - such as a Deed of Easement - are put in place which, in the council's view, would ensure there is no residual threat to the future operation of the cultural facilities(s).
- 8.69 The impact of noise sensitive development in proximity to cultural, night time economy and other uses is arguably the biggest threat which these uses face, as the introduction of sensitive uses may threaten the effective operation of these existing uses. The 'agent-of-change' principle addresses this issue in that the person or organisation responsible for change is responsible for managing the impact of that change.
- 8.70 Specific clusters of night-time economy uses may contribute more significantly to the night-time economy, particularly within the night-time economy clusters identified in the London Plan and the Cultural Quarters identified on policy x. Therefore, the introduction of sensitive uses may threaten the effective operation of night-time uses more acutely in these areas. Considering the potential growth of cultural uses, particularly in Cultural Quarters, should be considered when impacts are identified, in order to manage change in a sensitive way that reflects the function of an area. Details of how potential impacts could change or increase in future will be expected as part of relevant assessments, to ensure that future growth – for example in culture and night time economy uses - is not jeopardised.
- 8.71 Islington has a 24-hour economy which, coupled with the densely developed nature of the borough can lead to adverse impacts from uses which otherwise can co-exist. For example, office uses which operate through the night can impact on nearby residential

uses through light spill, mechanical plant operation and the operation of any ancillary functions such as bars or smoking terraces.

- 8.72 The council will require a Noise Impact Assessment and Acoustic Design Statement as part of all major residential developments; any other developments which give rise to potential noise and vibration impacts; or where agent of change is considered relevant. Where significant adverse impacts are identified as a result of the assessment, an application is likely to be refused. Other adverse effects should be mitigated and minimised as far as possible. Any assessment must be produced by a relevant competent person(s); further detail is set out in Appendix 2.
- 8.73 Noise and vibration impacts can make dwellings uninhabitable. It is therefore vitally important that noise and vibration impacts are robustly assessed for all planning applications involving residential use, at the earliest possible stage of the development. Noise is one factor which can affect amenity and amenity is an important consideration when determining the quality of housing. The design of housing is intrinsically linked to amenity; poor design often means a poor standard of amenity for future occupiers. Amenity can be affected by various factors, either individual factors or a combination of factors, including noise, levels of daylight and sunlight and the general level of comfort.
- 8.74 Development should use good acoustic design to achieve internal sound standards, rather than relying entirely on achieving relevant standards through the building envelope. The management of noise and vibration should be an integral part of development proposals and considered as early as possible. Addressing noise and vibration issues through good acoustic design at the initial design stage is important to avoid costly late stage alterations and potential non-policy compliance. Good acoustic design will include:
- Location of buildings on the site to minimise noise exposure (this will include maximising separation of noise sources and sensitive receptors and use of buildings or topography to screen noise);
  - Layout of habitable rooms within buildings to reduce noise exposure to more noise-sensitive rooms;
  - Ensuring dwellings exposed to high noise levels are dual aspect to provide each unit with access to a relatively quiet façade where possible;
  - Access to relatively quiet external amenity space; and
  - Measures to reduce noise at source and/or on the transmission path where possible.
- 8.75 Human response to vibration varies with the magnitude, the frequency and duration of exposure. Significant vibration within the borough (apart from temporary construction works) is most likely to be generated by railways, for example London Underground services, Overground trains and freight movements. Appendix 2 identifies when a Vibration Assessment will be required.
- 8.76 In cases where ongoing noise management and control is considered particularly important, a noise management plan (detailing controls and mitigations) will be required.
- 8.77 Noise management measures can be crucial for mitigating behavioural noise sources, which can include noise from gathering points and ingress/egress points for commercial uses. It is not always possible to specify sufficiently enforceable or precise noise management measures to form the basis of a reasonable planning condition. In such cases, refusal of permission may be necessary depending on the scale of the

impacts. Where it is judged that specific, precise, reasonable and enforceable noise management measures can be detailed, a condition can be recommended to cover this requiring an enforceable Noise Management Plan.

## **Policy DH6: Advertisements**

- A. Advertisements must:
- (i) be high quality in terms of visual appearance, and should not have flashing internal or external illumination;
  - (ii) be sited to prevent visual intrusion by virtue of light pollution into adjoining sensitive land uses, including residential properties and wildlife habitats;
  - (iii) Not restrict pedestrian movements;
  - (iv) contribute to a safe and attractive environment;
  - (v) not contribute to proliferation/clutter of signage in the vicinity; and
  - (vi) respect local context, including listed buildings and conservation areas.
- B. Temporary shroud advertisements which cover buildings being redeveloped or which are undergoing refurbishment may be acceptable where:
- (i) They are in place only for the duration of the building works, or a period of 12 months (whichever is shorter);
  - (ii) There have been no shroud advertisements on the specific building for the preceding 12 months; and
  - (iii) The dimensions of the shroud advertisement are no greater than that of the building.
- C. The repurposing of phone boxes for predominantly advertising use will not be acceptable, particularly in conservation areas and in proximity to other heritage assets including listed buildings.
- D. The council will seek the removal of deemed consent rights for the display of estate agents' boards where they are damaging the character and appearance of an area.

8.78 The term "advertisement" covers a very wide range of advertisements and signs, including hoardings, illumination of hoardings, illuminated fascia signs, free-standing display panels, and estate agent boards. Some advertisements are not regulated by the council and others benefit from "deemed consent", which means permission is not needed; this will depend on the size, position and illumination of the advert. Others advertisements will always need consent.

- 8.79 When deciding applications for advertisements the council can have regard to considerations of amenity and public safety, as well as the Control of Advertisements Regulations. Policy DH6 sets the criteria by which amenity and public safety will be assessed in Islington in relation to advertisements.
- 8.80 Temporary shroud advertisements may be acceptable on buildings being redeveloped/refurbished. This only relates to a shroud covering the building itself and not any separate hoarding or other structure used for advertising purposes.
- 8.81 Estate agents' boards have deemed consent rights for their display and thus do not need approval from the council to be displayed for a limited time period. The dense urban nature of Islington and the high frequency of sales and lettings can lead to a proliferation of estate agents' boards, which are not always removed within the required timescale. This results in a build-up of boards, both legal and illegal, detracting from building façades and causing an untidy and cluttered street scene. In such situations the council will seek the removal of deemed consent rights from the Secretary of State for this type of advertising.

## **Policy DH7: Shopfronts**

- A. New or refurbished shopfront design should:
- (i) respect the local street scene, the building as a whole and its design detail;
  - (ii) be accessible and inclusive; and
  - (iii) enhance natural surveillance and activate the frontage
- B. Shops that are converted to residential uses (including through permitted development) should retain the shopfront fenestration and natural surveillance of the street.

- 8.82 The design of new shopfronts and alterations to existing shopfronts is important to the appearance of the individual property, to the character and appearance of shopping areas, and provides visual connections between ground floor shops and the street.
- 8.83 New shopfronts must be inclusive, adopting the guidance provided in the Inclusive Design and Streetbook SPDs and BS8300:2018-2 in terms of the relationship between the shopfront and the adjacent footway.
- 8.84 The Islington Urban Design Guide provides further detail on shopfronts and will be used to assess proposals concerning shopfronts and shop signs. Sufficient information regarding shopfront proposals must be provided at planning application stage to enable assessment of the proposal.
- 8.85 Where shops or other uses with an active frontage are converted to residential use, the shopfront fenestration should be retained, to avoid negative impacts on the streetscene.



## Policy DH8: Public art

- A. Provision of high quality public art is encouraged as part of new development, where this does not constrain other higher priority Local Plan policies and objectives.
- B. All new public art should:
- (i) protect and enhance local character;
  - (ii) ensure that it does not compromise the delivery of sustainability or inclusive design policy objectives;
  - (iii) be site specific in terms of the design and concept;
  - (iv) be visible and able to be enjoyed from a publicly accessible location;
  - (v) Require minimal maintenance and (where necessary) decommissioning works; and
  - (vi) be developed in consultation with the community in which they are to be placed.

8.86 Public art can add distinctive character to places and spaces, creating visual interest, influencing the use of a space and providing a focal or meeting point. Public art can take many forms from more traditional sculpture to an artwork conceived as a garden, the façade of a building or a lighting installation.

8.87 However, provision of public art should not come at the cost of meeting other more important Local Plan priorities that have a more meaningful impact on the day-to-day lives of local residents and businesses. Priority will be gauged on a case-by-case basis, but policies relating to affordable housing, affordable workspace, sustainability and inclusive design will, in all cases, be a higher priority than public art provision.

8.88 Where public art projects are proposed as part of a new development, guidance should be sought from the council at the earliest possible opportunity to ensure the highest quality art provision. This will include:

- the extent that the proposed public art is freely accessible to the public;
- the impact on the local area and its character;
- the quality of the artwork
- the relationship between the proposed public art and the site;
- the level of community consultation undertaken;
- artist selection;
- the provision of appropriate budgets and briefs for the project team; and
- details of maintenance and any decommissioning works required, including availability of funding for such works.

8.89 The siting of public art should not compromise the delivery of sustainability or inclusive design policy objectives, for example by obstructing the public realm, affecting the legibility of routes or affecting sustainability measures such as SUDS.

# 9 Strategic infrastructure

## Policy ST1: Infrastructure Planning and Smarter City Approach

- A. The Council will identify and deliver the infrastructure required to support development growth over the plan period and enable effective delivery of the Local Plan objectives, through:
  - (i) Utilising an Infrastructure Delivery Plan and working with relevant providers to ensure necessary infrastructure is provided; and
  - (ii) Requiring contributions from development to ensure that the infrastructure needs associated with development will be provided for, and to mitigate the impact of development.
- B. The Council will utilise its planning function to put in place measures to develop the Smart Cities approach in Islington, by:
  - (i) Working with infrastructure providers to ensure world-class connectivity and ensuring developers provide in-building infrastructure capable of significantly exceeding minimum building control standards;
  - (ii) Considering use and interoperability of data, and digital innovation as part of the planning application process; and
  - (iii) Considering how the Council can promote use of technology to help people to live better lives.

- 9.1 To help the borough be adaptable and respond to change this policy details how infrastructure planning and a smarter city approach will be considered in Islington. Infrastructure needs and requirements change over time in response to the development and growth of Islington as well as changing objectives and priorities for both the Council and its partners. Key public sector partners include police, health service, and local universities.
- 9.2 Infrastructure<sup>37</sup> includes the roads, transport, public utilities, buildings or facilities and the services provided by them which are used both by residents and those who come to work, study in, or visit the borough. The Infrastructure Delivery Plan 2012 (IDP) is a valuable dataset which provides a benchmark of infrastructure and future infrastructure requirements. The IDP will be reviewed and updated where necessary as part of the Local Plan review.

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<sup>37</sup> Social and community infrastructure; and green infrastructure are covered by other Local Plan policies.

- 9.3 Utilities providers will be consulted with regards to relevant infrastructure and maintaining security of supply.
- 9.4 Infrastructure requirements may be funded through both planning obligations and the Community Infrastructure Levy. Planning obligations are specific requirements to be fulfilled by developers to ensure that impacts arising from a new development are addressed. Planning obligations may be contained in a S106 agreement or in a unilateral undertaking. Planning obligations are always drawn up and negotiated based on the characteristics of the individual site and development proposed. Obligations can include either direct provision of a service or facility, contributions towards a provision made by the Council, or both. Further guidance on where planning obligations will be required is set out in the Planning Obligations (Section 106) Supplementary Planning Document.
- 9.5 The Community Infrastructure Levy (CIL) is a non-negotiable charge used to fund local infrastructure that will support future development. CIL is charged on new developments involving the creation of one or more new dwellings, or 100 square metres or more of new gross internal floorspace. The Islington CIL Charging Schedule was adopted in September 2014 and finances both strategic and local infrastructure projects in the borough. The Islington CIL is used to fund the provision, improvement or replacement of community infrastructure that supports the development of the borough.
- 9.6 In most cases, the Islington CIL has replaced the use of planning obligations to secure contributions towards infrastructure from development. S106 agreements are used to secure affordable housing; to mitigate site-specific issues; and/or to address other policy requirements that cannot be dealt with through CIL. The Council maintains a 'Regulation 123' Infrastructure List, which sets out the items and types of infrastructure that may be fully or partially funded by CIL. Infrastructure included in the list cannot be funded through a S106 agreement.
- 9.7 Smart Cities goes beyond the role of planning. The rapid growth of mobile internet applications, the internet-of-things, cloud computing and open data are all part of this digital age and whilst they offer new business opportunities, they should also enhance quality of life for people living and working in Islington. Digital connectivity can also help the collection, analysis and sharing of data on the performance of the built and natural environment, including for example water and energy consumption, air quality, noise and congestion. Enabling the development of Smart Cities has the potential to greatly improve the implementation of key Local Plan objectives, such as monitoring the energy efficiency performance of buildings.
- 9.8 Planning can assist with the development of Smart Cities, particularly through the development of necessary infrastructure to allow for the future development/expansion of Smart Cities. This could include encouraging smart sensors which help to monitor the performance of buildings as part of the planning consent; and enabling the expansion of key technological networks such as 5G and superfast broadband, which often require infrastructure/assets on buildings and within the public realm. Use of data and interoperability of data can better support building management, management of space including public realm to benefit residents and people who work in the borough, for example through the implementation of Building Information Management (BIM) models.
- 9.9 Ensuring world class connectivity in new development will help residents and businesses take advantage of digital opportunities. The standards set out in Building Regulations part R1 are unlikely to be sufficient to allow the advancement of Smart

Cities. Therefore, higher standards should be provided where appropriate/feasible. The council may provide further supplementary guidance to help implement the Smart Cities approach, where necessary.

## **Policy ST2: Waste**

- A. Development proposals should provide waste and recycling facilities which:
  - (i) fit current and future collection practices and targets;
  - (ii) are accessible to all;
  - (iii) are designed to provide convenient access for all people, helping to support people to recycle; and
  - (iv) provide high quality storage and collection systems in line with Council guidance.
- B. The council will continue to work with the seven North London boroughs on the North London Waste Plan to provide sufficient land to meet waste management needs across the seven North London boroughs. The policies in the North London Waste Plan will be used to consider proposals for waste management facilities across the seven North London boroughs.
- C. The Hornsey Street Reuse and Recycling Centre will be safeguarded in order for Islington to continue to contribute to meeting aggregated waste planning requirements. Where development is proposed within close proximity to this facility, it should ensure that the ability of the Hornsey Street facility to operate effectively is not threatened, via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of sound, vehicle movements and other effects, in line with the 'agent-of-change' principle.

9.10 Sustainable waste management means dealing with more waste higher up the waste hierarchy to reduce waste creation, increase re-use and recycling and utilise waste as an energy source. A key part of this is ensuring that residents and businesses have sufficiently convenient facilities and storage to maximise re-use and recycling. Further details on how development proposals are expected to consider this are set out in policies H4 and B2. The council promotes a circular economy approach to design and construction to keep products and materials in use for as long as possible and to minimise construction waste. Further detail is set out in policy S10.

9.11 The seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Boroughs) are working together to produce the North London Waste Plan ('NLWP'). Once adopted, it will form part of the statutory Development Plan for these areas. The purpose of the NLWP is to provide sufficient land for the sustainable development of waste facilities that are of the right type, in the right place and provided at the right time to enable the North London Boroughs to meet their waste management needs throughout the plan period. The plan will also

provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

### **Policy ST3: Telecommunications, communications and utilities equipment**

- A. Telecommunications, communications and utilities equipment, including masts, boxes and satellite dishes will only be permitted where:
- (i) they are sited and designed to minimise their visual impact;
  - (ii) they do not have a detrimental effect upon the character or appearance of the building or area;
  - (iii) they do not compromise meeting other policy requirements including the delivery of sustainable design measures;
  - (iv) innovative design and technological solutions have been explored to minimise visual impact, and
  - (v) there is no reasonable possibility of sharing facilities.
- B. Applications for mobile phone network development must demonstrate that they have followed and are in accordance with the Code of Best Practice on Mobile Network Development in England or subsequent similar guidance.

9.12 In general, it is not acceptable to locate satellite dishes and other telecommunications and utilities equipment on the front of buildings and other locations where they are visible from the public realm. On-street location of telecommunications boxes and other utilities equipment should be avoided. Where this is not possible, equipment must be designed and located to prevent street clutter and conflict with pedestrian movement and street furniture.

9.13 The operation of equipment should not lead to any adverse impacts for residents or businesses, for example, noise arising from the running of equipment. Policy DH5 will apply to relevant applications for new telecommunications, communications and utilities equipment.

### **Policy ST4: Water infrastructure**

- A. Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

- i) sufficient capacity already exists; or
- ii) extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

B. When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds the appropriate improvements to cater for the development. Any improvements must be completed prior to occupation of the development.

9.14 The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that the development would not lead to problems for existing users.

9.15 In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity constraint and no improvements are programmed by the water company, it would be expected that the developer pays a fair and reasonable contribution towards the appropriate infrastructure. The infrastructure must be completed prior to occupation of the development.

# 10 Appendices

## Appendix 1: Marketing and vacancy criteria

Where policies require marketing information to be submitted, the following details will be used to assess the acceptability, or otherwise, of the information submitted and any marketing undertaken.

Marketing evidence requires demonstration of an active marketing campaign for a continuous period, whilst the premises were vacant, which has shown to be unsuccessful.

The minimum period of vacancy/marketing is identified within policies. It must be shown to the council's satisfaction that marketing has been unsuccessful for all relevant floorspace.

A detailed marketing report should be submitted to the council and should include appropriate evidence of all of the following. Examples of the type of evidence that could be used to demonstrate that each criterion has been met is also set out below. The examples provided are not an exhaustive list.

1. Registration of the property with at least one reputable local or national commercial property agent - this could be evidenced through submission of appropriate correspondence from the property agent setting out marketing has commenced / is underway.
2. The length of marketing and vacancy periods, including dates. Marketing should be continuous and from the point when the advertisement board was erected or the online ad was posted (not from the point at which the property agent was appointed). The length of the vacancy period should be clearly evidenced e.g. through the submission of correspondence from the property agent.
3. Erection of an advertising board in a prominent location on site (subject to advertising consent, if required) for the duration of the marketing period – this could be evidenced with photographs of the board in place.
4. Publication of property details / particulars online on popular commercial property letting / selling websites – this could be evidenced with screenshots of the webpages of where the space is advertised.
5. Advertisements should include the following basic information: location, size, site description, lawful land use, property type, specification and costs (including rent and service charges) – this could be evidenced through providing the marketing particulars.
6. Property details / particulars available to inquirers on request – this could be evidenced through particulars and advertising board setting out contact details.
7. Property marketed for the appropriate use or uses as defined by the relevant planning policy – this could be evidenced through marketing particulars and advertisement board setting out appropriate uses.
8. Property marketed at a reasonable price that genuinely reflects the market value, including in relation to appropriate use or uses, condition, quality and location of floorspace, including independent professional valuation from at least three agents to confirm the price is reasonable – this could be evidenced with statements from independent property agents/valuers.
9. Detailed commentary on any enquiries received. The number of enquiries should be set out. Information on who the enquiry was from i.e. the name and type of business /



organisation, and the type of space / use they required should be provided. Details on outcome of any enquiry and in particular why any enquiry was not successful should also be set out – this could be evidenced within a table and / or email correspondence from enquirers.

10. Detailed commentary on any viewings undertaken, setting out the number viewings undertaken, who viewed the space i.e. the name and type of business / organisation, reasons why those viewing the space did not wish to make an offer - this could be evidenced within a table and / or email correspondence from enquirers.
11. Detailed commentary on the number, type, and value of offers received. Information on who made the offer, i.e. the name and type of business / organisation, and the type of space / use they required should be provided. Where offers were received but not accepted, reasons for refusal should be provided - this could be evidenced within a table and / or email correspondence from enquirers.

## Appendix 2: Noise and vibration

The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, Islington's thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' as commonly used within dose/response relationships and referred to in the National Planning Policy Framework and Planning Practice Guidance:

- **NOEL:** No Observed Effect Level - This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.
- **LOAEL:** Lowest Observed Adverse Effect Level - This is the level above which adverse effects on health and quality of life can be detected.
- **SOAEL:** Significant Observed Adverse Effect Level - This is the level above which significant adverse effects on health and quality of life occur.

Three basic design criteria have been set for proposed developments, these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application. The design criteria outlined below are defined in the corresponding noise tables. The values will vary depending on the context, type of noise and sensitivity of the receptor:

- **Green** – where noise is considered to be at an acceptable level.
- **Amber** – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development.
- **Red** – where noise is observed to have a significant adverse effect.

Special consideration will need to be given to noise sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise likely to have an adverse effect. This will include noise impacts from other noise sources (such as children's playgrounds and nurseries, gyms, MUGAs/sports pitches, beer gardens) and where the 'agent of change' principle applies.

A noise assessment should be carried out and should cover a period sufficient to be representative of the prevailing noise climate. In most cases this will require assessment covering midweek and weekends. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

### Assessment / Statement Information requirements

The Acoustic Design Statement should include proposed impact and proposed mitigation through acoustic design. Full details on building construction and composite façade calculations to predict the internal noise level in habitable rooms should be included. The Acoustics Ventilation and Overheating Guide (AVO Guide) produced by the Association of Noise Consultants should be followed. When designing ventilation to mitigate noise, due

consideration must be given to the impact of local air quality and the need to minimise exposure to poor air quality.

Use of good acoustic design to achieve internal sound standards is preferable to sole reliance on the building envelope. The following should be demonstrated:

- Location of buildings on the site to minimise noise exposure (this will include maximising separation of noise sources and sensitive receptors and use of buildings or topography to screen noise)
- Layout of habitable rooms within buildings to reduce noise exposure to more noise-sensitive rooms
- Ensuring dwellings exposed to high noise levels are dual aspect to provide each unit with access to a relatively quiet façade when possible
- Access to relatively quiet external amenity space
- Measures to reduce noise at source and/or on the transmission path where possible

The layout of adjacent dwellings and the location of lifts and circulation spaces is required to limit the transmission of sound to noise sensitive rooms within dwellings. Applications which cannot demonstrate effective mitigation for all proposed residential units will be refused. Residential conversions in particular can commonly lead to adverse amenity impacts including from noise and vibration; proactive consideration of layouts and other issues can help mitigate or prevent these impacts.

All Noise Impact Assessments and Acoustic Design Statements shall be carried out by a relevant competent person. Most suitably qualified consultants will be full Members of the Institute of Acoustics and/or the Association of Noise Consultants in addition to holding relevant technical qualifications such as a Degree and/or Post Graduate Diploma in Acoustics or related engineering fields. Noise assessments must clearly state the level of uncertainty attached to their conclusions.

Noise management plans may be required for mitigating behavioural noise sources.

### **Noise standards for residential use**

This section sets out specific criteria and guidance residential development. Where day and night periods are referenced, day periods are defined as 0700-2300, and night periods are defined as 2300-0700.

Table A2.1 below sets out effect level values for proposed residential developments affected by transportation noise:

**Table A2.1: Noise levels applicable to noise sensitive residential development proposed in areas of existing transportation noise (road/rail/mixed)**

Assessment Location	Period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
1m from a noise sensitive façade	Day	<50dBA L <sub>Aeq</sub> 16 hour	50-72dBA L <sub>Aeq</sub> 16 hour	>72dBA L <sub>Aeq</sub> 16 hour
	Night	<40dBA L <sub>Aeq</sub> 16 hour	40-72dBA L <sub>Aeq</sub> 8 hour <82dBA L <sub>AFmax</sub>	>72dBA L <sub>Aeq</sub> 8 hour >82dBA L <sub>AFmax</sub>
Inside a resting room (e.g. living room)	Day	<35dBA L <sub>Aeq</sub> 16 hour	35-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
Inside a sleeping room (e.g. bedroom)	Day	<35dBA L <sub>Aeq</sub> 16 hour	35-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
	Night	<30dBA L <sub>Aeq</sub> 8 hour <42dBA L <sub>AFmax</sub>	30-40dBA L <sub>Aeq</sub> 8 hour	>40dBA L <sub>Aeq</sub> 8 hour
Inside a dining room	Day	<40dBA L <sub>Aeq</sub> 16 hour	40-45dBA L <sub>Aeq</sub> 16 hour	>45dBA L <sub>Aeq</sub> 16 hour
Outdoor living space (free field)	Day	<50dBA L <sub>Aeq</sub> 16 hour	50-55dBA L <sub>Aeq</sub> 16 hour	>55dBA L <sub>Aeq</sub> 16 hour

**Note: Day periods are defined as 0700-2300; night periods are defined as 2300-0700.**

For all new residential developments, the following internal design targets shall be achieved:

**Table A2.2: internal design targets for sound insulation in dwellings**

Room type	Noise level
Bedrooms	35dBA L <sub>Aeq</sub> 16 hour <sup>†</sup> , 30 dBA L <sub>Aeq</sub> 8 hour <sup>*</sup> , 45dBA L <sub>AFmax</sub> <sup>*</sup>
Living rooms	35dBA L <sub>Aeq</sub> 16 hour <sup>†</sup>
Dining rooms	40dBA L <sub>Aeq</sub> 16 hour <sup>†</sup>
* - Night-time between 23:00-07:00; † - Daytime between 07:00-23:00.	

The 10th highest individual L<sub>AFmax</sub> event in any night shall be determined and the noise level from this event shall be used to inform the above mitigation design target.

Please note that where there is any concern over the efficacy of measures submitted to comply with these standards or for all major developments (over 10 dwellings or over 1000m<sup>2</sup> in size), post-completion verification testing will be required in a sample of the most affected rooms. Where it is unavoidable to rely on closed windows to achieve the above internal design targets there must be a suitable alternative means of ventilation provided which is sufficient to ventilate the premises and to adequately control excess heat in the summer months.

## Residential private outdoor space

The following standard should be achieved in external private residential amenity areas in daytime between 0700 and 2300 hrs:

- <50dBA  $L_{Aeq, 16hr}$

Where this is not possible to achieve despite implementing all reasonable mitigation measures, the standard can be relaxed by 5dB so that the sound level in private gardens and balconies does not exceed 55dBA  $L_{Aeq, 16hr}$ . In very high noise areas where the less stringent standard of 55dBA  $L_{Aeq, 16hr}$  cannot reasonably be achieved, with careful design it should be achieved in some parts of the amenity space.

External amenity areas such as balconies and gardens should be protected from noise as far as is reasonably practicable. The following mitigation measures should be considered:

- Building design, location and layout to shield amenity areas or place them away from noise sources where possible
- Use of acoustic fencing with a gap-free joining system and a minimum density of 12Kg/m<sup>2</sup> (or solid blockwork walls) to gardens
- Use of high, solid and imperforate balustrades to balconies and terraces
- Use of Class A acoustic absorption (suitable for outdoor areas) on balcony undersides and soffits
- Enclosure of balconies and terraces to form 'winter gardens'

If external amenity spaces are an intrinsic part of the overall design, the acoustic environment of those spaces should be considered so that they can be enjoyed as intended.

## Industrial and Commercial Noise Sources

For industrial and commercial development, it is necessary to submit a noise assessment for any development which could result in a change in noise impact on any sensitive receptor. A sensitive receptor is any receptor that may be adversely impacted by noise, typically residential dwellings, schools, hospitals. New development can involve installing new noise-generating plant, new work processes or equipment or making changes to buildings or structures that affect sound transmission. When a sensitive receptor is proposed near to an existing commercial noise source this will also require a noise assessment in line with the "Agent of Change" principle.

To assess industrial and commercial noise sources the British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' should be used. The following criteria shall apply:

*"The design and installation of new items of fixed plant shall be such that when operating the cumulative noise level  $L_{Aeq Tr}$  arising from the proposed plant, measured or predicted at 1m from the facade of the nearest noise sensitive premises, shall be a rating level of at least 5dB(A) below the background noise level  $L_{AF90 Tbg}$ . The measurement and/or prediction of*

*the noise should be carried out in accordance with the methodology contained within BS 4142: 2014.”*

Where installations of mechanical plant are proposed, a noise assessment with valid predictions should be submitted as part of the application. The background sound level shall be defined as the typical minimum value. Any assessment shall include a valid assessment of the acoustic features. Where data is not available for plant, site measurement to verify this shall be required. As per BS4142, any assumptions made for character will need to be justified and may need further analysis for validation. It is advised that a post installation verification report is carried out, with noise measurements of the plant, to demonstrate compliance with the design criterion.

The Council will take into account the hours of operation of the plant where this is set and controlled by timer switch. There are certain smaller pieces of equipment on commercial premises, such as extract ventilation, air conditioning units and condensers, where achievement of the rating levels (ordinarily determined by a BS4142 assessment) may not afford the necessary protection. In these cases, the Council will generally also require a NR curve specification of NR25 or below, dependant on the room (based upon measured or predicted  $L_{eq,5mins}$  noise levels in octave bands) 1 metre from the façade of affected premises, where the noise sensitive premise is located in a quiet background area.

Standby and emergency plant noise is a growing noise issue with the Borough. With emergency or standby plant, the same criteria shall apply.:

### **Cultural Uses and the Night time economy**

Assessments for noise from night time economy uses must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including  $L_{Aeq}$  and  $L_{AFmax}$  metrics and appropriate frequencies. Where it is not possible to achieve suitable and sufficient internal noise levels for proposed noise sensitive receptors despite appropriate mitigation proposals due to the totality of noise from existing entertainment venues then planning permission will not be granted. These noise standards will normally be applied to both night time economy proposals that may generate new noise and for noise sensitive development. Usually these standards would apply to development located within the Central Activities Zone, town centres and cultural quarters but there may be individual proposals outside these locations where these standards would apply.

**Table A2.3: Noise limits for entertainment noise**

Position	Time	Criteria
External	0900-2300	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = 0 to +5 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = 0 to +5 dBC
	2300-0900	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = -5 to +3 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +3 dBC
Internal	0900-2300	EN = Noise Rating NR25-35 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +5 dBC
	2300-0900	EN = Noise Rating NR15-25 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to 0 dBC

Position	Time	Criteria
External	0900-2300	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = 0 to +5 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = 0 to +5 dBC
	2300-0900	$L_{Aeq,5min}$ EN minus $L_{Aeq,5min}$ or $L_{A90,5min}$ WEN = -5 to +3 dBA
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +3 dBC
Internal	0900-2300	EN = Noise Rating NR25-35 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to +5 dBC
	2300-0900	EN = Noise Rating NR15-25 Leq,5mins
		$L_{Ceq,5min}$ EN minus $L_{Ceq,5min}$ or $L_{C90,5min}$ WEN = -10 to 0 dBC

EN = Representative, or predicted, entertainment noise level

WEN = Representative noise level without the entertainment noise, measured or predicted 1 m from the facade of noise-sensitive premises.

Internal measurements should be undertaken at a representative position and where necessary be the same for both the EN and WEN assessments. The height of the measuring microphone should be between 1.2 to 1.5 m above the floor and 1 m away from any sound reflecting or absorbing surfaces.

### Sound insulation and mixed use buildings

Any development which includes residential floorspace adjacent to non-residential should submit an assessment of the internal sound transfer for any development which may increase noise impacts in existing multi-use buildings. Some examples of where an assessment would be required are:

- A new development incorporating an A4 bar on the ground floor and residential flats above
- Conversion of an existing ground floor A1 shop to an A3 restaurant where there is an existing residential flat above
- Conversion of an office sharing a party wall with a light industrial use into a residential dwelling
- Any situation where an assessment is required as a result of other standards (such as BB93)

In some cases, an airborne sound insulation standard will be specified rather than requiring compliance with a noise rating criterion. In such cases the standards will usually be as follows:

Party walls, floors and ceilings between the non-residential premises and residential floorspace shall be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

- For A4 premises, D1\D2 premises such as places of worship, concert halls, community space for hire or B2\B8 industrial premises, standards will be judged on a case by case basis depending on the exact nature of the use. Greater than 60dB DnT,w + Ctr is likely to be necessary
- For A3 or A5 premises or large A1 cafes, shops and supermarkets: At least 55dB DnT,w + Ctr
- For small A1 cafés or shops: At least 50dB DnT,w + Ctr

Where non-residential uses are placed above residential floorspace there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.

### **Other Noise Sources (children's playgrounds and nurseries, gyms, MUGAs/sports pitches, beer gardens etc.)**

Other noise sources can give rise to issues following development and any noise source that may impact on sensitive receptors should be assessed as part of a planning application. Examples would include new car parks, children's play in playgrounds and nursery play areas, gyms, multi-use games areas(MUGAs)/sports pitches, beer gardens, skate parks etc.

Where no relevant standards exist to guide an Acoustic Design Statement, the assessment should include:

- Comprehensive measurement of examples of the noise source from existing sites operating elsewhere†
- Comparison and verification of measured data against existing data sources where possible (e.g. from scientific literature or international standards)
- Assessment of the existing background level at the receptor location
- Calculation of the predicted specific noise level at the façade, gardens and amenity areas of sensitive receptors, based on relevant obtained data
- Comparison of noise levels to relevant general standards such as WHO standards and BS8233:2014
- Full consideration of the impact of LAFmax noise (for example from door slams, dropping of weights, treadmill or weights machine usage, ball strikes, shouts or whistles)
- Consideration of the character of the noise and whether this may exacerbate the impact on amenity
- Full consideration and reporting of assessment uncertainty\*



† Acoustic consultant's 'stock' or 'library' data can only be accepted in assessments where full details of how, where and when it was obtained are provided.

\* See University of Salford 'A Good Practice Guide on the Sources and Magnitude of Uncertainty Arising in the Practical Measurement of Environmental Noise' [2007] for further details.

In cases where ongoing noise management and control is considered particularly important, a noise management plan (detailing controls and mitigations) will be required.

As there are no specific standards governing how to assess irregular noise sources, extra care should be taken to ensure that source data and predictions are sufficiently robust and the assessment should be open and clear in respect of the level of uncertainty attached to the conclusions.

In the case of placing new sensitive receptors where they may be affected by existing noise sources such as the above, assessment should follow the same principles as above however the source data should be based on maximum typical existing (measured) noise levels from the sites, accounting for any possible future changes in intensity of use.

Mitigation may involve measures to reduce the noise at source, such as anti-vibration mounted fencing on MUGAs to reduce ball impact sound, floating floors for gym weights area or limiting hours of operation, or measures to reduce or prevent transmission of sound, such as acoustic screening around a playground.

Advice on the acoustic design of hospitals is contained in Health Technical Memorandum 08-01: Acoustics. For schools and other educational facilities, attention is drawn to the Building Regulations and The IOA/ANC's "Acoustics of Schools – a design guide" ([www.ioa.org.uk/sites/default/files/Acoustics%20of%20Schools%20-%20a%20design%20guide%20November%202015\\_1.pdf](http://www.ioa.org.uk/sites/default/files/Acoustics%20of%20Schools%20-%20a%20design%20guide%20November%202015_1.pdf)).

LBI does not prescribe noise and vibration standards for hotel bedrooms although it is recommended that hotels are designed to meet the criteria provided in BS 8233:2014 and many hotel chains have their own criteria. The Council will also take into account the likely times of occupation for types of development and will be amended according to the times of operation of the establishment under consideration.

## **Quiet Areas and Places of Relative Tranquillity**

Where applications are received that may adversely affect any spaces prized for tranquillity and remain relatively undisturbed by noise, an assessment of noise impact will be expected. Where new development creates new publicly accessible public open space it will be expected to create new quiet spaces and areas of tranquillity. Improving existing spaces will also be sought and the following are some examples of good design that can help to reduce noise impact and improve relative tranquillity:

- Using site layout and building structures to form barriers and reduce noise
- Using other physical barriers or ground level changes to provide shielding from noise sources such as roads

- Green walls to reduce noise reflection and absorb particulate
- Planting of trees and shrubs
- Plants and ground greening to reduce reflection and encourage wildlife

## Vibration

LBI will normally require a vibration assessment where railways, either surface or underground, are within 30m of a proposed development site. The need for a vibration assessment at other sites will be assessed on a case by case basis. The table below notes vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted. Note values are derived from BS6472-1-2008 and are only a SOAEL (red) value - developments should be designed to minimise the effect of vibration wherever possible.

**Table A2.4**

Vibration description and location of measurement	Period	Time	Vibration level (VDV in $ms^{-1.75}$ )
Inside critical areas i.e. operating theatre, precision laboratory	Day, evening and night	00:00-24:00	0.1
Inside residential dwellings	Day and evening	07:00-23:00	0.2 - 0.4
Inside residential dwellings	Night	23:00-07:00	0.13
Inside offices	Day, evening and night	00:00-24:00	0.4
Inside workshops	Day, evening and night	00:00-24:00	0.8

Ground borne noise, as a result of vibration from adjacent railways and other sources, shall not exceed 35 dB  $L_{ASmax}$  within habitable residential rooms. Where it is predicted that noise from this source will exceed 35dB  $L_{ASmax}$ , proposals to mitigate re-radiated noise to acceptable levels shall be submitted to and approved in writing by the LPA. However, due to the high cost of mitigating vibration effects, this should be subject to early discussion with the LPA.

## Appendix 3: Transport Assessments and Travel Plans

Developments which meet the thresholds set out in Table A3.1 will be required to produce a Transport Assessment and a Full Travel Plan.

**Table A3.1: Thresholds for Transport Assessments and Travel Plans**

Use	Threshold
A1 Retail	Equal or more than 1,000sqm
A2 (Financial Services)	Equal or more than 1,000sqm
A3/A4/A5	Equal or more than 750sqm
B1/B2/B8	Equal or more than 2,500sqm
C1 Hotels	Equal or more than 50 beds
C3 Residential	Equal or more than 50 residents
D1 Hospitals/medical centres	Equal or more than 50 staff
D1 Schools	All developments to have a school travel plan
D1 Higher and further education	Equal or more than 2,500sqm
D1 Museum/gallery	Equal or more than 100,000 visitors annually
D1 Places of worship	Equal or more than 200 members/regular attendees
D2 Assembly and Leisure	Equal or more than 1,000sqm
It is mandatory for NHS trusts to have travel plans	

All major developments that fall below the thresholds in the table above will be required to produce a Transport Statement and a Local Level Travel Plan.

The council may still require that a Transport Assessment and a Full Travel Plan accompany applications for new developments that do not meet these thresholds, where a transport impact is expected from the development, or a cumulative impact is expected from different uses within a development or from a number of developments in the vicinity. Worst case scenarios in terms of transport impacts (for example - peak hours) should be demonstrated in the relevant document and it may be required to demonstrate such scenarios in TRAVL (Trip Rate Assessment Valid for London).

### Transport Assessments / Transport Statements

Transport Assessments are required to assess the impact of proposals on the transport infrastructure, including the capacity of roads, public transport and walking and cycling infrastructure, and to detail action to manage this impact. They are required to present qualitative and quantitative information about the anticipated transport and related environmental impacts before, during and after implementation of the proposed development, including details of the accessibility of the site by all transport modes and all users, including disabled people, and the likely modal split of journeys to and from the site.

Where the council does not consider the preparation of a full Transport Assessment necessary, a less detailed assessment in the form of a Transport Statement will be required. Whatever the scale of Transport Assessment / Statement undertaken, it should be used to inform the final design of the development and if applicable, the Full Travel Plan / Local Level Travel Plan.

Developers are required to demonstrate that the Transport Assessment / Transport Statement has informed the design of the proposed development and the Full Travel Plan / Local Level Travel Plan. Development proposals shall meet the identified needs and address anticipated impacts of the development through the design of the scheme, effective management, including through a Travel Plan where appropriate, and through mitigating any impacts of the scheme, including through planning obligations where appropriate.

Details of what is required in a Transport Assessment are found in TfL's Transport assessment best practice - guidance document (2010).

### **Full Travel Plans / Local Level Travel Plans**

Full Travel Plans / Local Level Travel Plans are the key management tool for implementing any transport solutions highlighted by the Transport Assessment / Statement, and are one of the primary tools for mitigating negative transport impacts of development proposals. Full Travel Plans/ Local Level Travel Plans are required to detail the developer's response to the Transport Assessment / Statement and deliver sustainable transport objectives with a package of measures to promote sustainable transport, including measures to achieve a shift to the most sustainable forms of transport: walking and cycling.

The Full Travel Plan / Local Level Travel Plan is required to set out the on-going management arrangements for the development, which shall normally include the appointment of a Travel Plan coordinator and a steering group, management company or community trust. A monitoring schedule and outline of the approach to monitoring is required within a Full Travel Plan; a monitoring period of at least 5 years will apply. Enforcement actions are required to be agreed prior to any grant of planning permission, to plan for any unimplemented or failed measures.

Where a Full Travel Plan is required, the following documents should be submitted in the planning application process:

**Table A3.2 Full Travel Plan documents required**

Timescale Document	Timescale Document
Submission of planning application	Full Travel Plan Template
Prior to occupation	Draft Full Travel Plan
6 months after first occupation	Full Travel Plan

The Council will ask for travel plans to be carried out, in compliance with TfL's tools. All full travel plans must use TRICS compliant monitoring surveys. All other travel plans and travel plan statements should have iTRACE compliant surveys.<sup>38</sup> Travel plans should reflect the movement hierarchy set out at T1B, prioritising and supporting active travel.

Details of what is required in a Full Travel Plan are found in TfL's Travel planning for new development in London. The latest guidance from TfL was released late 2013 and TfL will release new travel plan guidance and tools in early 2019.

For Local Level Travel Plans, a template will be required to be submitted alongside an application (Major applications including less than 80 dwellings). This template should use the following headings:

- **Context** (general information on development, e.g. use, size, location and general timescales for development);
- **Policy** (specific focus on identifying Islington's transport targets and other relevant targets);
- **Site Assessments** (general overview as to what facilities are present);
- **Travel Survey / Trip Generation** (mode split based on trip generation software, census or other relevant and robust prediction methods);
- **Objectives** (based on comparisons between policy and trip generation, development objectives and targets);
- **Targets** (as per objectives);
- **Travel Plan Management** (a main point of contact for a development with regards to Travel Plan issues);
- **Measures** (design; post-occupation measures, action plan, securing and enforcing the plan, monitoring).

This list is not exhaustive, and the council may require further information depending on the circumstances of the development.

<sup>38</sup> <https://tfl.gov.uk/info-for/urban-planning-ad-construction/travel-plans/monitoring-travel-plans>.

## Appendix 4: Cycle parking standards

Table A4.1 below sets out minimum cycle parking standards for development to be achieved under Policy T2 (Walking and cycling). Separate cycle parking provision to that set out below for short stay visitors and customers should reflect the standards set out in Table 10.2 in the London Plan.

**Table A4.1: Minimum cycle parking standards**

Spaces Per	Class	Description
1 per 60sqm	A1	Retail
1 per 60sqm	A2	Financial and professional services
1 per 60sqm	A3	Restaurants and cafés
1 per 60sqm	A4	Drinking establishments
1 per 50sqm	A5	Hot food takeaways
1 per 50sqm	B1(a)	Offices
1 per 250sqm	B1	other
1 per 400sqm	B2	General industry
1 per 400sqm	B8	Storage and distribution
1 per 14 bedrooms	C1	Hotels
1 per 4 beds		Hostels (Sui Generis)
1 per 3 staff		Care homes (for staff and visitors)
1 per 3 employees		Hospitals (for staff and visitors)
1 per 2 students		Student accommodation
1 per bedroom	C3	Housing
1 per 7 staff plus 1 per 10 students		Schools
1 per 7 staff plus 1 per 7 peak time students		Higher education
1 per 4 staff		Libraries (for staff and visitors)
1 per 3 staff		Health facilities / clinics (for staff and visitors)
1 per 3 staff		Community centres (for staff and visitors)
1 per 50sqm		Theatres and cinemas

1 per 275sqm		Leisure and sports
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Areas in table A4.1 above refer to Gross Internal Area floorspace. Proposals for uses not specifically covered by the cycle parking standards will be required to provide cycle parking in accordance with the most appropriate classification.

The Council is investigating the general approach to cycle parking standards and may translate the standards in table A4.1 into a minimum floorspace requirement rather than number of spaces per sqm. Moving to a minimum floorspace requirement would provide the opportunity for innovation and flexibility in the design of cycle parking facilities with the aim to encourage increased use of cycle storage through improvements to overall quality and usability of cycle storage.

Where only a small quantity of cycle parking is provided, care should be taken to ensure a suitable minimum of parking for non-standard cycles is provided e.g. by providing space for parking at the end of a row of Sheffield stands. Below 20 spaces, at least one accessible rack should be provided. All new cycle parking facilities above 20 spaces should provide at least 20% accessible cycle parking spaces, of which 5% must be designated for a disabled 'blue badge' cyclists. The 5% of the accessible racks provision for disabled cyclists should be strictly allocated and marked as a blue badge. Clear and appropriate contact detail signage should be provided for the manager of the facility so cycle users are able to raise queries.

Staff parking is required to be located on site. Visitor short stay parking should be provided off the public highway, where this is not possible, it may be appropriate within the public realm. Mixed-use developments should provide separate cycle parking for different uses. Housing refers to conventional housing, student housing and Houses in Multiple Occupation with different standards for each. For publicly accessible developments, cycle parking for the public may be provided either through on-site provision and/or through a financial contribution to allow the council to install off-site parking in the public realm. The appropriate provision of cycle parking shall be discussed in accordance with Table 10.2 set out in the London Plan. The amount of off-site parking required will be related to the need for publicly-accessible parking and to site characteristics, with a requirement for all parking to be conveniently located for the intended users. Accessible cycle parking should be located next to or just as close to a destination as accessible car parking is. Publicly accessible cycle parking will be credited towards the minimum visitor parking requirement. Publicly-accessible cycle parking is intended to be used for visitors to the development, but shall be open to all members of the public to use.

Cycle parking should be integrated from early stages of design and is required in addition to any minimum floorspace requirements related to the use. Any area to be used for cycle parking must be in addition to minimum residential space standards (including storage and amenity space) and requirements for employment floorspace.

End-of-trip facilities are required to include at least accessible changing facilities, showers, lockers and clothes drying facilities and are required to be sufficient to meet the peak needs of the development, based on the occupancy of the development and the amount of cycle parking required.

Cycle parking shall accommodate accessible cycle parking spaces for all types of non-standard cycle, such as tricycles and recumbents, which are most commonly used by disabled cyclists. Accessible cycle parking spaces shall be served by a route at least 1,500mm in width and the spaces shall be wider than standard cycle parking spaces. Accessible cycle parking ensures clear access within cycle parking installations for anyone

using a larger cycle such as a tricycle, cargo cycles and these cyclists should have priority use.

'Blue badge' cycle parking has the same characteristics as accessible cycle parking plus they should be provided at the end of a rack of cycle parking, in order to accommodate for the wider turning circles of non-standard cycles and to allow for dismounting. Where possible, 'blue badge' cycle parking bays should allow people on non-standard cycles to ride into and out of the bay (meaning no need for reversing, turning or lifting a cycle). Signage should be put in place that clearly denotes 'blue badge' cycle parking allocated for non-standard cycles (e.g. "Reserved for cargo and non-standard cycles. Priority to disabled cyclists"). For legibility, appropriate signage should be provided. Blue and white paint should be used to delineate the area of a non-standard cycle bay (which could also feature a logo that depicts a disabled cyclist and cargo cycle). Where no inclusive cycle parking spaces have been provided, a notice should be appended that acknowledges this issue and signposts the user to a designated contact person. Information about where blue badge cycle parking is provided must be included.

Residential schemes are required to provide accessible cycle parking for all wheelchair housing. Cycle parking suitable for families should also be provided. This may include parking that can accommodate trailers for children, and is required at least in relation to family-sized units i.e. residential units with three or more bedrooms.

Developers may consider a more intensive approach to meeting cycle parking standards than standard approaches. Two-tier cycle parking and vertical/semi-vertical solutions are available and enable a more efficient use of land. In addition, there are a range of alternative intelligent cycle storage solutions available. However, vertical and semi-vertical, as well as two-tier cycle parking rely on the user having the strength and dexterity to operate the parking facilities whilst standing. Therefore, innovative and flexible solutions in terms of space will still need to be provided alongside accessible parking. For these reasons semi vertical and vertical racks should not respectively make up more than 10% and 25% of the total number of racks. Two tier cycle racks are not considered appropriate for residential and visitor use, due to their installation and maintenance costs. The council acknowledges that for certain uses such as student accommodation, B1 office and retrofit, some vertical solutions may be acceptable. This will be decided on a case by case basis. Where developers submit that there are difficulties in complying with cycle parking standards they must demonstrate that all options have been investigated.

The council has worked with Wheels for Wellbeing, a charity which supports disabled people to cycle in London and campaigns for the rights and needs of disabled cyclists nationally. A 2011 survey of urban cycle usage in Islington was undertaken in which 13% of respondents have a disability (and use their cycle as an effective mobility aid). This percentage is greater than the national average, which may be because driving in London is difficult and, whilst the buses are accessible to mobility impaired users, many London Underground stations are not and many journeys will involve a combination of the two. 44% of disabled respondents and 20% of non-disabled people cannot use stepped parking facilities. 4% of respondents use tricycles.

The council also aims to invest in roads that are unallocated as cycle routes, to ensure that all roads are suitable for cycling and have good facilities for pedestrians.



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