



# **THE DRAFT LONDON PLAN**

## **SUMMARY NOTE**

**PLANNING POLICY**  
**PLANNING DIVISION**

July 2002

## 1.0 INTRODUCTION

- 1.1 This summary note sets out a short outline of the aims and objectives of the Draft London Plan produced for consultation by the Mayor of London. The Draft London Plan is the consultation document that the Mayor must produce in order to progress the strategic spatial development plan for London. The consultation period runs for three months and any comments must be returned to the Mayor by 30 September 2002. The full document (over 400 pages) is available to view or download from the Mayor's website at [www.london.gov.uk](http://www.london.gov.uk). The Draft Plan can also be seen at libraries and at the Council's Planning Enquiries Desk, 222 Upper Street.
- 1.2 This note then identifies the key issues for Islington, setting out what the Draft London Plan will mean for the Borough. This is followed by summary of the possible responses that are being prepared by officers. A recommended response will be reported to the Council's Executive on 26 September 2002. The response agreed at this meeting will form the Council's response to the Mayor's consultation.
- 1.3 The Mayor is responsible for producing a number of strategies for London, one of which is the spatial development strategy called the London Plan. The seven other strategies are: Transport, Economic Development, Culture, Biodiversity, Air Quality, Ambient Noise and Municipal Waste. Each of the strategies that the Mayor is required to produce should be consistent with the others.
- 1.4 The Mayor produced initial proposals for the London Plan in May 2001. While the Mayor consulted on this document this was not a statutory stage in the process. The Council returned comments during the consultation period in order to feed into the preparation of the Draft Plan.
- 1.5 When adopted the London Plan will replace the current strategic planning guidance for London that was produced by the Secretary of State in May 1996 (RPG3). It will set the context for land use planning at the regional level over a 15-20 year period. The policies in unitary development plans (UDPs), that are prepared by the London Boroughs, will be required to be in general conformity with the London Plan. As a result, the policies that are included in the Plan will have an impact on policies contained in Islington's UDP. This may require some policy areas in the UDP to be revisited after the London Plan is adopted.
- 1.6 The responses to the consultation on the Draft will be considered by a government appointed panel who will hold an Examination in Public, which is scheduled for early 2003. The Mayor will adopt the final London Plan after considering the Panel's report and publication is expected in late 2003.
- 1.7 In order to encourage participation in the development of the London Plan the Council will seek views from across the Borough, both internally and from a wide range of bodies and organisations, during the consultation period,. These views will be collated and inform the Council's response to the Mayor. The Council's consultation will comprise the following:
  - reporting to the Council's Area Committees - North, South, East and West;
  - engaging with the Islington Strategic Partnership;
  - meeting with the Central London Partnership;
  - writing to approximately 200 local groups.
- 1.8 As the Draft Plan covers a wide range of topics, a number of the Council's service areas will contribute to formulating the Council's response.

## 2.0 SUMMARY OF THE DRAFT LONDON PLAN

### Vision

2.1 The vision of the London Plan is to develop London as an exemplary sustainable world city based on the following three themes:

- strong, diverse long term economic growth;
- social inclusivity;
- improvements in environmental management and the use of resources.

2.2 These three themes of growth, equity and sustainable development are carried throughout all of the Mayor's strategies. The fundamental policy direction underpinning the whole of the London Plan is to move away from policies of dispersal, to accommodating rapid growth within the urban form and addressing the deficiencies in transport, housing, health, education and supply of business space.

### Trends

2.3 The London Plan identifies six major drivers of change that will impact on London's future. The trends are:

- a growing, younger more diverse population
  - population projected to grow from 7.4 million now to 8.1 million in 2016
- rapid but selective economic growth
  - financial and business services sector
  - information and communications
  - distribution
  - retail and leisure
  - creative industries
- responding to environmental issues
  - protection and improvement of the environment
  - better use of key resources, including land and buildings
  - reducing car-based travel
  - re-use of previously developed land
- changed lifestyles and values
  - more youthful and diverse population
  - higher density, urban, intensive environment
  - live / work balance
  - mixed use and mixed communities
- impact of new technology
  - changes in retailing, work and education
  - new skills and training
  - flexible home and work environments
- pursuing social justice
  - tackling social polarisation.

2.4 The Draft London Plan seeks to manage the pressures for development that the trends create and ensure that supply meets the demands of the market, rather than attempting to constrain or restrict growth. In this respect the Plan states that London will have to

become more densely populated, with a more intense residential and commercial environment. This will require major improvements in the transport infrastructure and to regenerate the physical and social aspects of communities.

## **Objectives**

- 2.5 In order to achieve the vision of the plan and accommodate the growth trends the plan sets out six main objectives, which are listed below.
- **Objective 1:** making the most sustainable and efficient use of space; encouraging intensification and growth in areas of need and opportunity.
  - **Objective 2:** making London a better city to live in.
  - **Objective 3:** making London a more prosperous city with strong and diverse economic growth.
  - **Objective 4:** promoting social inclusion and tackling deprivation and discrimination.
  - **Objective 5:** improving London's transport.
  - **Objective 6:** making London a more attractive, well-designed and green city.
- 2.6 London's growth will be accommodated by the Plan within the policy context set out below:
- that intensification does not encroach onto open spaces, leading to higher densities on brownfield sites;
  - integrate scale and phasing of development with the accessibility to and capacity of the public transport system;
  - supply of commercial floorspace, housing, skills, transport and quality of environment to match demand in order not to inhibit growth;
  - prioritise areas for future development, such as East London, Central London and town centres.
- 2.7 Essentially the Draft London Plan seeks to accommodate high projected economic and population growth by ensuring that supply meets demand.
- 2.8 In order to deliver the aims and objectives of the Draft London Plan the Mayor will work in partnership with other stakeholders, including the boroughs, the private sector and local groups.

## **3.0 WHAT THE DRAFT LONDON PLAN MEANS FOR ISLINGTON**

- 3.1 This section sets out the key policy directions in the Draft London Plan that have the most impact on Islington. The topics covered include spatial development, housing, economic development, transport, town centres, open space, sustainability and the built environment. Each of the topic areas are interconnected and overlap.

### **Spatial Development**

- 3.2 The Draft London Plan divides the city into five sub-regions: West, North, Central, South and East. A Central Activities Zone (CAZ), which covers parts of the Central and East

sub-regions, is also defined. Islington is placed in the Central sub-region, along with Camden, Westminster, Kensington & Chelsea, Wandsworth, Lambeth and Southwark. Unusually, the City of London is placed in the East sub-region. The southern tip of the Borough falls within the CAZ.

- 3.3 Spatial frameworks for each of the sub-regions are to be prepared by the Mayor, in consultation with the boroughs, in the form of supplementary planning guidance after the adoption of the London Plan.
- 3.4 The Thames Gateway, in the East sub-region, and Central London are shown as the main growth points, with larger town centres and suburbs across London indicated for revitalisation. The main priorities of the Draft London Plan affecting Islington are:
- Central Activities Zone
    - to intensify development to accommodate high growth, particularly business, tourism and retail activity
  - to extend economic development into the city fringe;
  - to enhance and diversify town centres;
  - Areas of Opportunity
    - large sites able to accommodate 5000 jobs or 2500 homes
    - Kings Cross, part of which falls inside Islington, is only area identified for Islington
    - focus on mixed use development
  - Areas of Intensification
    - scope for higher densities where public transport accessibility and capacity allows, but land not immediately available
    - Arsenal/Holloway is identified with an indicated allocation of 1500 new jobs and 2000 new homes on 38 hectares (reference is made to the Arsenal stadium redevelopment proposals as a good example in this context)
    - Farringdon/Smithfield, on the southern boundary of the borough, is identified to accommodate at least 2000 new jobs and 100 new homes
  - Areas for Regeneration
    - tackling social exclusion in areas of substantial deprivation
    - 20% most deprived Wards in London identified, a number of which fall within Islington.

## **Housing**

- 3.5 The two main priorities are to encourage higher density development to maximise supply and to provide more affordable housing. The Draft Plan requires at least 23,000 new homes to be built each year across London. A sub-regional target for a minimum of new housing to be built in Central London between 1997 and 2016 is set at 140,200. Islington's target contribution for this period is set at 18,070, which equates to 900 new units per year.
- 3.6 In order to meet this requirement, the Draft Plan states that development will need to focus on:
- Areas of Opportunity
  - transport interchanges
  - redeveloping low density commercial sites to secure mixed use development including housing
  - change of use of redundant employment land
  - small scale residential infill or redevelopment in town centres

- 3.7 Public transport accessibility will not generally determine the location of new housing sites, but it should influence the density and level of car parking provision, particularly in major developments.
- 3.8 The Draft Plan seeks 50% of all new dwellings in residential and mixed use development schemes in the Central sub-region to be for affordable housing. This is made up of 35% social rented housing and 15% intermediate housing (for example for key workers). It is noted that a public subsidy of between £500-£600 million per year will be required to achieve this higher proportion of affordable housing provision in London. This is an increase of £150 million on what is currently available.

### **Economic Development**

- 3.9 The Draft Plan highlights the huge pressure for office based growth within the CAZ. New development will be focused on the CAZ and other key locations such as business parks and town centres. New office proposals in the CAZ should also contain residential uses as part of a mixed use development.
- 3.10 While the number of manufacturing jobs are forecast to fall the Plan recognises the important role in London's economy. It aims to match demand with supply that meets the needs in terms of space, location and environment.

### **Transport**

- 3.11 The Draft Plan reflects the aims for London in the Mayor's Transport Strategy that was published in July 2001. The future development of London should contain the negative impacts of road traffic and promote public transport, walking and cycling. The congestion charging area in central London will include the areas of the Borough to the south of Pentonville Road and City Road.
- 3.12 Development is promoted at locations accessible by public transport where capacity is able to meet the demands of the new proposal. A number of rail schemes are proposed and supported in the Draft Plan. Those that impact on Islington are as follows:
- Crossrail 1: along the southern boundary of the Borough;
  - Crossrail 2 (formerly the Hackney-Chelsea line): from King's Cross through the centre of the Borough to Hackney;
  - Orbirail/East London Line: extensions through centre of Borough to Highbury & Islington;
  - Channel Tunnel Rail Link to King's Cross;
  - Cross River Transit Scheme (Trams) serving the King's Cross Area of Opportunity in Camden.
- 3.13 Access to town centres and local centres should be improved by better bus and rail services, including enhancing bus priority networks.
- 3.14 In terms of reducing the impact of road traffic the Plan seeks to reduce traffic in Central London by 15%. In order to achieve this reduction the traffic generation of new development will have to be assessed, along with improvements to alternative modes, including walking and cycling, and through the implementation of the congestion charging zone.
- 3.15 Car parking standards set out in the Plan reflect regional planning guidance for the South East (RPG9) and are in line with residential standards set out in national

guidance (PPG3). However, the standards for retail development are slightly stricter than those in national guidance (PPG13) due to the increased public transport accessibility in London. Additional car parking, other than for residential use, is unlikely to be accommodated in the CAZ, as it is already well served by public transport.

### **Town Centres**

- 3.16 Town centres are supported and promoted in the Plan. A mix of uses, including retail, leisure and community facilities, and their accessibility provide a focal point for communities. Town centres are favoured over out of centre locations for large trip generators, such as retail and leisure uses, and a sequential approach is adopted to ensure that town centre sites are considered first.
- 3.17 The Draft Plan includes a strategic town centre network and identifies the following centres in Islington:
- Major Centres
    - Angel: where the viability and access is to be maintained and enhanced
    - Nags Head: where the potential for regeneration and increasing the benefit to the community should be realised
  - District Centre
    - Archway: where the viability and access is to be maintained and enhanced.
- 3.18 New small-scale hotel and tourism facilities should be located within the town centres and the CAZ, except where there is an existing concentration and further development would have an adverse impact on local amenity or the mix of uses. Larger scale proposals should be directed towards Areas of Opportunity.

### **Open Space**

- 3.19 The Draft Plan sets out policies to protect the network of open spaces in London ranging from the Green Belt and Metropolitan Open Land to locally important small play spaces. As the aims of the plan are to intensify the use of other land uses the important contribution of open space to the physical environment, health and biodiversity of the city will increase. Development proposals that adversely impact on open spaces or protected nature conservation interests are to be resisted.

### **Sustainability**

- 3.20 In order to improve the use of natural resources, reduce the levels of waste and increase energy efficiency and use of renewable sources of power, a number of crosscutting policies are in the Plan
- 3.21 In order to reduce landfill and export of waste outside London the Plan promotes best practice in waste management to reduce, reuse, and recover waste before the last option of disposal. The proximity principle that requires waste to be treated as close to the source as possible is also adopted. This will require new facilities, such as for recycling, composting, waste treatment and energy recovery sites. However, the Plan does not support an expansion in new incinerator capacity.
- 3.22 Policies also cover the reuse of building materials, reducing air pollution, ensuring a high quality water supply and noise reduction.

## **The Built Environment**

- 3.23 High quality design and construction is a central objective of the Draft Plan and is viewed as being essential in achieving higher densities and intensification of land while minimising adverse impact on environmental and social considerations. New development should maximise the use of space to make the most of land and transport investment. A range of densities for new residential development that is linked to accessibility to facilities and transport are set.
- 3.24 While it is recognised that high densities need not mean tall buildings, it is stated that tall buildings can use space efficiently in appropriate locations. Clusters of tall buildings are viewed as being appropriate within the CAZ as they can offer a supply of premises for office needs. Tall buildings may be appropriate in other location where there is major public transport capacity. The Draft Plan states that Boroughs should not impose blanket height restrictions.
- 3.25 The contribution of London's built heritage is recognised, particularly in the opportunities for regenerating neglected areas. The restoration and reuse of vacant or at risk historic buildings and places can contribute to community and economic renewal.
- 3.26 A number of strategic views of St. Paul's Cathedral are identified and protected. Three of the viewing corridors identified pass across the Borough from the following locations: Alexandra Palace, Kenwood and Parliament Hill.

## **Implementation**

- 3.27 The Draft London Plan recognises the wide range of organisations and bodies that will be involved in implementing the policies of the Plan, including the London Boroughs. The Plan proposes to create a role for the Mayor in setting priorities for S106 Planning Agreements in order to ensure that the strategic policies of the Plan are implemented. The policies in the Plan also refers to working with the Boroughs in order to influence the use of Compulsory Purchase Orders (CPOs). However, S106 Agreements and CPO powers are currently exercised by the Boroughs and S106 are negotiated with developers.
- 3.28 The Mayor makes clear his support for the reforms proposed in the Government Green Paper on the planning system. Amongst other things these reforms would replace UDPs with a strategic borough policy framework and area action plans that either cover a small particular area or a topic.
- 3.29 The Plan also makes reference to an additional 18 supplementary planning guidance notes that the Mayor will produce on topics ranging from sub-regional spatial frameworks to assessing retail need. These will give further advice to the Boroughs on these topics and the Council will have to give regard to them in preparing its policies and in determining planning applications.

## **4.0 ISLINGTON'S RESPONSE TO THE MAYOR**

- 4.1 The policies and proposals contained in the Draft London Plan have implications for considering new development proposals in Islington. This raises a number of questions that have to be addressed, for example where the policy direction is different to that pursued by the Council or where the outcomes of the Plan's objectives are unrealistic or unachievable. There are also areas in the Draft Plan that support the Council's policy objectives and create a more robust framework for these to be implemented. This

section sets out the main areas where the Council would wish to comment on the Draft Plan and raises some questions on how the Council should respond. The list is not exhaustive and other issues can be taken into consideration. The Council welcomes views on these and other issues as part of its own consultation exercise in order to inform its response to the Mayor.

### **Accommodating Growth**

- 4.2 The policy direction of the Draft London Plan seeks to accommodate high growth by ensuring high supply. As Islington falls within the Central London sub-region and the CAZ, this will mean intensifying an already high density environment. While the Draft Plan promotes growth in the Metropolitan centres and transport interchanges in outer London, it concentrates growth within the central area. This will have an impact on the existing townscape and quality of environment in the Borough.
- 4.3 Rather than accommodating growth where the market demands the London Plan could direct such growth so that it is spread more evenly across the whole city. This could result in more diversely located employment and growth centres, reducing the demand on scarce land in the central area and reducing the pressure on the capacity of the transport infrastructure.
- 4.4 The ability of London to accommodate the growth envisaged in the Plan is linked to major improvements in the public transport infrastructure of the Capital, such as Crossrail.

- **Please answer questions 1-3 on the questionnaire.**

### **Spatial Development**

- 4.5 The City of London is placed in the East sub-region, but parts of it also fall into the CAZ. In addition the key diagram shows a 'Central London' designation that covers a more traditional central area, including the City, that only contains the southern part of Islington. These designations are confusing and inconsistent and clearly need to be corrected.

- **Please answer question 4 on the questionnaire.**

### **Housing**

- 4.6 The targets for new housing set in the Plan for Islington (18,000 new dwellings over 15 years) appear to be based on recent relatively high building levels in Islington rather than on the capacity or the supply of land. Achieving the targets will have implications for other land uses in the Borough either by intensifying the residential environment through higher densities and/or by changes of use. This could see more demand on community services and facilities, such as schools and local shops, at the same time that there is increasing pressure for such uses to change to residential use.
- 4.7 As Islington is already densely developed, increasing the densities further could adversely affect the quality of the existing urban environment and be unsustainable.
- 4.8 The current affordable housing proportion that Islington seeks is 25% of all new residential developments. The London Plan wants to increase this proportion to 50% of all new housing development. The Plan also makes reference to providing affordable housing as part of commercial schemes. The London Plan states that local assessments of need should be taken into account in setting targets for affordable

housing provision. While the Council welcomes a higher percentage it is unclear how the target of 50% will affect the delivery of affordable housing across the Borough.

4.9 The removal of site thresholds that limited the requirement to proposals over 15 units is welcomed. This would tackle the problem of developers submitting applications for less than 15 dwellings in order to avoid the affordable housing requirement.

- **Please answer questions 5-8 on the questionnaire.**

### **Economic Development**

4.10 The London Plan envisages accommodating the pressure for new office and other employment development within the CAZ and central London area. In Islington the fringes of the CAZ and the City are home to small, traditional businesses that could be 'squeezed out' if the demand for new office space is not sufficiently controlled.

- **Please answer question 9 on the questionnaire.**

### **Transport**

4.11 The closer co-ordination of public transport accessibility and capacity with land use development is supported in the Plan. As are the aims of reducing road traffic and increasing public transport provision and the conditions for walking and cycling. In addition to the transport schemes mentioned in the Draft Plan, the Council would like to see the inclusion of a new station on the North London line to serve the new development at the King's Cross Area of Opportunity.

4.12 The use of Public Transport Accessibility Levels (PTALs) in assisting car parking provision for new developments is welcomed. The Council would like to see a clearer commitment that Transport for London would provide such a specialist service to the Boroughs during the consideration of proposals or masterplans as part of implementing the aims of the London Plan.

4.13 The Council welcomes the restraint based approach to car use and parking. The residential car parking standards are based on the accessibility of the site to public transport. However, factors such as design and location can also warrant a reduction in car parking. For example, bringing listed buildings back into use may need car parking provision to be constrained. In addition, there is no policy in the Draft Plan for car-free housing development.

- **Please answer questions 10-11 on the questionnaire.**

### **Town Centres**

4.14 The Council welcomes the use of the sequential test for retail and leisure developments as this will help to maintain and enhance the vitality and viability of town centres. Locating large trip generators in town centres is more sustainable than allowing out of centre development that is reliant on the private car.

### **Open Space**

4.15 The protection for the full range of open spaces in the hierarchy set out in the Draft Plan is welcomed. In particular, the linking of Metropolitan Open Land with Green Belt is supported. The protection of identified areas of nature conservation value is also

welcomed. Such regional policies reinforce Islington's own policies at the local level, making them more robust.

- 4.16 The protection for local open spaces in the Plan is weaker than Islington's policies. The London Plan would allow development proposals on such spaces where no need is demonstrated, or the need can be accommodated elsewhere, or replacement space is provided. As Islington has one of the lowest provisions of open space in the country, all of the local open spaces are protected in the UDP without the requirement to demonstrate need. Islington's policies also state that such replacement space would only be allowed in exceptional circumstances in order to recognise the value of the existing open spaces.
- 4.17 The Council supports the identification of the Blue River network, which includes the Regent's Canal in Islington. This supports the Council's policies for protecting the character and opening access to the canalside.

- **Please answer question 12 on the questionnaire.**

### **Sustainability**

- 4.18 The aims in the London Plan to improve waste management and use natural resources more efficiently are welcomed. Islington Council is committed to reducing waste, improving air quality, promoting energy efficiency and reducing noise.

- **Please answer questions 13 on the questionnaire.**

### **The Built Environment**

- 4.19 The Council supports policies in the London Plan that seek to improve the design of new development in order to maximise the potential of development sites.
- 4.20 The Draft London Plan supports tall buildings as an efficient way of using space in the appropriate locations and states that clusters would be appropriate in the CAZ. However, tall buildings have an effect on a wide area, which can be detrimental. In addition, the Plan is against blanket restrictions to the height of tall buildings. Currently, Islington's policy resists development over 30 metres in height throughout the Borough.
- 4.21 The Council supports the protection for strategic views in the Draft Plan and welcomes the recognition for local views.

- **Please answer questions 14-15 on the questionnaire.**

### **Implementation**

- 4.22 The Plan seeks a wider role for the Mayor in dealing with Section 106 Agreements and the use of Compulsory Purchase powers, both of which currently fall within the remit of the London Boroughs.
- 4.22 A wide range of additional documents would be produced by the Mayor as supplementary planning guidance that would add to the amount of policy advice that the Boroughs will have to have regard to when preparing planning policies or determining planning applications.

- **Please answer questions 16-17 on the questionnaire.**