

## **THE DRAFT LONDON PLAN**

### **Draft Spatial Development Strategy for Greater London**

## **Islington Council's Response**

**AGREED BY THE FULL COUNCIL, 19 September 2002:**

**That the Council agree the detailed comments set out below as Islington's response to the Mayor of London's consultation on the 'Draft London Plan'.**

**That the Islington Strategic Partnership Board, and other residents and businesses in the borough, are kept informed of progress on the London Plan and on any further responses that this Council might make.**

These comments look at the main parts of the Plan relevant to Islington and sets out the Council's response. It contains 12 sections, as follows:

1. Vision, Trends and Objectives
2. Spatial Development
3. Housing
4. Economic Development
5. Transport
6. Town Centres
7. Open Space
8. Waste and Pollution
9. Energy
10. Sustainable Development
11. Built Environment and Design
12. Implementation and related issues

In view of the structure of the Plan, and the need to avoid repetition, comments on it are not always in the same sequential order as in the plan. Each section comprises a brief summary of the relevant part of the plan (shown in grey boxes) followed by the Council's comments and appropriate representations.

### **Section 1 Vision, Trends and Objectives**

#### **Vision**

The vision of the London Plan (page 6) 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.

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**

The London Plan (chapter 1A) identifies six major drivers of change that will impact on London's future. The trends are:

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

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**

In order to achieve the vision of the Plan and accommodate the growth trends the Plan sets out six main objectives (pages 7 - 11), 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.

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.

Essentially the Draft London Plan seeks to accommodate high projected economic and population growth by ensuring that supply meets demand.

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.

## Comments

1.1 The key questions surrounding the Plan are whether high growth is inevitable, and if it is how it should be accommodated. In relation to the first question, the Plan states that its assumptions are conservative, and LBI officers concur that the figures reflect past trends and are consistent with government projections. This being the case it is clearly sensible to plan for the growth to take place in the most sustainable and socially beneficial way. However the Plan is weak in supporting its contention that growth should be accommodated in London, rather than elsewhere in the UK. It would be interesting to know whether the RDAs and City Councils around the country would agree that encouraging growth in London will be beneficial to them as well as to the capital. The Mayor would argue that this is for the government to decide, but the issue is of considerable importance and should be debated at the examination in public.

1.2 The Plan's vision has three components - and omits the imperative (included in LPAC's Strategic Planning Advice) to secure a better quality of life for all Londoners. This could usefully be added.

1.3 One potential driver of change that has not been examined is the impact of technology on the distribution of housing, jobs and services. The massive changes created by the internet over the last few years are bound to continue and will have many impacts - some good and some bad. It is considered that urgent research on this should be carried out.

**The Council supports the vision and objectives of the Plan, subject to:**

- **consideration at the EIP of the distribution of housing and employment in London in relation to the rest of the UK.**
- **the need for additional research on the impact of new technology.**
- **the addition of a need to secure a better quality of life within the Plan's overall vision.**

## Section 2 Spatial Development

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. (See chapters 2A and 2B of the Draft Plan).

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.

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.

### **City Fringe**

- extend economic development into the city fringe.

### **Town Centres**

- 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.

### **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.

## **Comments**

2.1 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 part of the borough is in 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 eastern and central areas. The latter will have an impact on the existing townscape and quality of environment in the Borough.

2.2 Rather than accommodating growth where the market demands it is considered that the London Plan should direct such growth more positively to East London and to suburban areas. A more even spread of growth across the whole city would result in a more diverse pattern of new employment and housing, which would support town

centres, reduce the demand on scarce land in the central area and reduce the pressure on the capacity of the transport infrastructure.

2.3 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. The Plan should consider the scenario that these new schemes may be delayed, or even abandoned. (A proposal similar to Crossrail was originally proposed in 1845, and the Jubilee line took 51 years to complete!). Given these possibilities, the Plan should consider which options for growth are the most flexible and least dependent on new infrastructure.

2.4 As stated above, 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 (page 109) shows a 'Central London' designation that covers a more traditional central area, including the City, that only contains the southern part of Islington. Reference is also made to the City Fringe - which is not defined. These designations are confusing and inconsistent and clearly need to be corrected or revised.

2.5 Apart from providing a basis for statistical analysis it is not clear why the Plan is based so heavily on the concept of sub-regions. These regions follow borough boundaries and make little or no sense as planning units - for example Finsbury Park clearly has more in common with Haringey and Hackney than it does with 'Central London'. If sub-regional strategies are prepared these should follow more logical boundaries. Overlapping boundaries could also be possible, for example enabling the City to be a partner in the preparation of regional frameworks for both the central and the eastern regions. (As a minor aside Map 2A.3 refers to these areas as administrative sub-regions - whilst this might be the Mayor's aspiration it is clearly not the case at present!)

2.6 The preparation of sub-regional frameworks and planning frameworks for the Opportunity Areas represents an attempt by the Mayor to become involved in detailed planning at a more local level. It is unlikely that this was envisaged by the government when they drafted the legislation to set up the GLA. The status of any supplementary planning guidance produced by the Mayor is also problematic. Whilst the Mayor has the power to direct the boroughs to refuse major planning applications, the responsibility for preparing local development plans and for dealing with planning applications remains with the boroughs. In determining planning applications boroughs are required to take the London Plan and their own UDPs into account together with other material considerations, such as supplementary planning guidance agreed by the authority. However whether this extends to advice prepared by the Mayor is a moot point. This issue is considered further in section 12.

2.7 Given this uncertainty, and that fact that the Council may wish to consider this matter in conjunction with other boroughs and the ALG, it is proposed that a 'holding' objection is made to the relevant policy (2A.1).

2.8 Chapter Two of the Draft Plan includes sub-regional allocations of housing and employment. This information is repeated at a borough level elsewhere in the Plan, and comments on these are set out later in this document.

2.9 Kings Cross is the only Opportunity Area affecting Islington - although most of the development potential at King's Cross is within Camden. It is recommended that the Council supports the concept of the Opportunity Areas, and the over-arching policy for them (2A.2), subject to the deletion of the requirement to 'exceed' the minimum guidelines for employment and housing. At present the Council has insufficient information to assess what level of housing and employment growth is required in the 'Islington' part of King's Cross, and further discussions are required before this can be agreed. The scope for large scale development at King's Cross is premised on it's high

public transport accessibility. However this is not the same as thing as capacity and ease of use. Some improvements are already taking place and others are planned. However the Plan could add support to the upgrading of existing tube services, and the provision of a new North London Line station at Maiden Lane (also see section 5 of this Appendix).

2.10 Two 'Areas of Intensification' affect Islington - Holloway and Farringdon/Smithfield. The former is supported, as it reflects what is already happening as a result of the Arsenal proposals and the Council's related desire to regenerate central Islington. The proposed intensification at Farringdon/Smithfield is more problematic, and further work is necessary to establish precisely where this area is and whether it has the capacity to provide for a further 2000 jobs, given the major conservation constraints in the area.

2.11 The proposed Areas of Regeneration are welcomed as they support the Council's existing regeneration policies, and encourage a greater joining-up of regeneration, housing, transport and planning policy. It is particularly important to ensure that the priorities of all parts of the GLA family (eg TfL and LDA) support the Plan's spatial policies.

2.12 The concept of a Central Activities Zone reflects our UDP and is therefore supported. However the area seems to have been expanded to cover the 'city fringe' areas of Clerkenwell, Smithfield and Bunhill although this is not clear from the maps in the Plan. This could have a major impact on the character of these areas and is not acceptable. In addition the requirement to maximise plot ratios in the CAZ (Policy 2B.1) should be tempered by a requirement that schemes should meet exacting design and conservation standards. Map 2B.2 shows part of the city fringe in Islington as having a strong 'special industries' character. This is inappropriate terminology with a resonance of scrap metal dealing and oil refining - it should be replaced with 'local service industries' or perhaps 'local services'.

2.13 Chapter 2A includes policies on sustainable development, the suburbs, open spaces and the 'blue ribbon network'. These policies are either inapplicable to Islington, or are generally consistent with the Council's existing policies. However some detailed comments are included in the relevant sections later in this Appendix.

2.14 Chapter 2B includes proposals for major growth in East London. This is strongly supported, as it provides employment opportunities closest to those who need them the most. (Map 2A.7). The proposed improvements to public transport (Crossrail etc) will increase opportunities for Islington residents to access these new jobs.

2.15 The London Diagram and the map showing the Central London Sub-Region both include a few errors - that no doubt have already been spotted - including the omission of King's Cross, the wrong designation for Holloway, and the wrong location for the Nag's Head.

**The Council:**

- **supports the general concept of 'Areas of Regeneration' and 'Opportunity Areas'.**
- **objects to the distribution of new housing and employment set out in tables 2A.2 and 2A.3, with a view to lower growth in central London and higher growth in the other sub-regions.**
- **suggests that the Plan considers the implications of any delays to the provision of new transport infrastructure, and for greater flexibility to respond to such eventualities.**
- **objects to the preparation of sub-regional frameworks and planning frameworks for the Opportunity Areas, in the terms set out in policies 2A.1, 2A.2 and 2B.3.**

- **objects to the nomenclature used on Map 2A.3 and proposes that these boundaries are used for statistical purposes only. If they are given any greater status, the City should be included in Central London.**
- **suggests that if sub regional plans are produced, that these should follow more logical and functional boundaries - to be agreed with the boroughs concerned. The boroughs would need to agree the terms of reference for these plans, but considers that they can only function as material planning considerations if formally agreed by the relevant boroughs.**
- **objects to the inclusion of a requirement to exceed the minimum guidelines for employment and housing in the Opportunity Areas (Policy 2A.2).**
- **proposes that the Plan should support improvements to existing tube services at Kings Cross and the construction of a new station on the North London Line at Maiden Lane.**
- **objects to the employment and housing targets for Kings Cross and Farringdon, until further clarification is obtained**
- **objects to any extension of the Central Activities Zone into Clerkenwell, Smithfield and Bunhill.**
- **objects to the designation of part of the city fringe in Islington as having a special industries character, and that this is replaced with 'local services' character.**
- **objects to the lack of a clear definition of the wider central area and the City Fringe.**
- **supports the over-arching requirement to facilitate growth in East London.**
- **draws the Mayor's attention to the various mapping errors identified in this part of the Plan.**

## Section 3 Housing

Housing policies are set out in Chapter 3A. The two main priorities are to maximise supply by encouraging higher density development and to provide more affordable housing. The Draft Plan requires at least 23,000 new homes to be built each year across London. The sub-regional target for new housing to be built in Central London between 1997 and 2016 is set at a minimum of 140,200 units. Islington's target contribution for this period is 18,070, which equates to 900 new units per year.

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.

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.

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.

## Comments

3.1 The targets for new housing set in the Plan for Islington (18,000 new dwellings over 20 years) are based on recent relatively high building levels in Islington rather than on a study of the capacity of the land and buildings in the borough to deliver this total without causing environmental damage. 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.

3.2 Islington's position, through the UDP, has been that targets for boroughs should be based on a far more rigorous approach, that assesses land supply, conversion potential and environmental constraints; but also gives a positive planning lead as to where new housing should be located. It really cannot be right that Islington (the second smallest London Borough - excluding the City - at 1400 hectares) should provide 18000 homes, whilst Havering (11,400 hectares) provides 6900, Newham (3800 hectares) 17,000, Barking (8,700 hectares) 10,000 and Merton (3700 hectares) 8600. Furthermore Camden and Hackney both have lower targets than Islington, despite being significantly larger in area. The briefest glance at Map3A.1 shows that these figures are not based on housing capacity, whilst the oft-repeated statement that the 1999 LPAC study was agreed by all the boroughs is simply not true.

3.3 Islington's objections are not based on a nimby position - as the borough's success in attracting new housing demonstrates. In addition the approval of the Arsenal scheme (which was always treated as being additional to UDP targets) will mean that we will be able to hit (and probably exceed) the annualised target in the short and medium terms. However maintaining high targets into the long term is likely to be very damaging to the character and liveability of the borough.

3.4 Objections can also be raised to the policy that targets should be exceeded. This is a Trojan horse allowing unacceptable schemes to be forced through the planning system. It is also contrary to the government's 'plan, monitor and manage' policy. In planning terms an over-supply of housing can be as damaging as an under-supply, as it encourages developers to build on the easiest and most profitable sites, rather than where housing is most needed.

3.5 The Plan supports Islington's innovative policy to require all new housing to be to Lifetime Home Standards. This is greatly welcomed and should assist the Council in implementing its policy. The Plan also requires that 10% of all new dwellings should be wheelchair accessible or easily adaptable to meet these standards. The meaning of 'easily adaptable' and the relationship between wheelchair housing and lifetime homes are unclear and require clarification.

3.6 The Plan defines affordable housing as comprising both social housing and intermediate housing. Islington's policy has been to focus on the social housing element, as this is the priority need. However the lack of provision for key workers and the need to encourage a greater social mix in regeneration areas has long been recognised. It is therefore recommended that the Mayor's definition is accepted, subject to the rider that

the provision of intermediate housing should always be additional to the social housing component and not a substitute for it.

3.7 The Mayor proposes that 50% of new housing should be affordable (35% social housing and 15% intermediate housing). This position was also agreed by the Council's Policy Committee in July 2001. It is therefore recommended that the Council endorses this target in principle, and also supports the Mayor in his attempts to ensure that London receives adequate public subsidies to support this figure.

3.8 Even if additional social housing grant is allocated to London, a further difficulty is that the Housing Corporation is currently looking to amend its funding allocation policies to reflect regional and sub-regional priorities, rather than individual Borough ones. In practice this is likely to mean that increasingly the Corporation will be looking at prioritising large 'strategically significant' sites, rather than supporting smaller, and probably more expensive, schemes that (Arsenal aside) are more typical of Islington. The likely result is that the public funding necessary to support the provision of 18000 new units in Islington, at a 50% affordable housing rate, will not be forthcoming. If this occurs Islington will have to seek nominations into out-of-borough housing, so that local people in housing need do not lose out on housing opportunities. This calls into question the total housing target, the affordability target and the legality/practicality of seeking contributions from developers through S106 agreements.

3.9 The Plan recommends the removal of site thresholds that limited the affordable housing requirement to proposals over 15 units, and also refers to providing affordable housing as part of commercial schemes. It is recommended that the Council supports both these proposals in principle. However the Plan seems to introduce an element of flexibility that might undermine the overall objective to increase supply. For example in Islington a significant increase in affordable housing simply will not happen if developers can switch from a residential scheme with a S106 to a commercial scheme without one. A level playing field is required and firmer policies are necessary for this to be achieved.

3.10 Policies 3A.9 and 10 are concerned with payments in lieu (ie off site provision). In Islington this must be considered as an option of last resort - it is already apparent that Islington has a clear shortage of development sites that can be earmarked for affordable housing. Methods of calculating commuted sums should be based on providing an appropriate amount of affordable housing elsewhere.

3.11 The Plan refers to the need for mixed and balanced communities but does not define what these are or how they should be created or adapted. It is very unclear how the affordable housing policy should work in areas which have a high existing percentage of social housing.

3.12 If agreed, the Mayor's policies for affordable housing, will require changes to Islington's UDP. In the meantime the Council has begun its regular review of its supplementary planning guidance on Affordable Housing. It is envisaged that decisions on this will be taken by Members in January, and a key issue will be the extent to which the Council wishes to move towards the 50% target in advance of the London Plan being approved.

3.13 The other key housing issue for Islington is density. This is included in the section of the Plan on design - which reflects the misplaced basis of the Mayor's policies. A variety of density figures are proposed, but unfortunately it is not completely clear which figures will apply to Islington - although they appear to range from 300 to 1100 habitable rooms per hectare, with an emphasis on the higher part of the range (ie 700 hrh and above). It is ironic that para 3A.25 recognises that 'a part of London's appeal as a world city is due to the attractive character of its residential areas', and that the forward to the summary specifically identifies Islington as an attractive place in which to live. The

prevailing densities in Islington are much lower than 700 hrh. Whilst there are cases where the Council has agreed to very high densities (for example the conversion of office buildings, for high-cost non-family accommodation) there are very few examples where families and affordable housing have been provided at the densities now being proposed.

3.14 Whilst Islington's UDP includes some guideline figures for housing density (350 and 450 hrh), the density policy is criteria based. In determining the appropriate density for a scheme the Council assesses the following factors

- the urban design context;
- the design of the building, which should be of a high quality;
- public transport accessibility;
- the availability of local services and facilities;
- the suitability of the accommodation for the prospective occupier and the necessary management arrangements;
- impact on residential amenity.

It is recommended that the policy in the London Plan on density is scrapped and replaced with a criteria based policy, such as that included in Islington's UDP.

**The Council:**

- **objects to the housing targets set out in Table 3A/1, and supports the need for an early review of these figures (policy 3A.1)**
- **objects to the statement in para 3A.15 that the housing capacity study was agreed by all the boroughs.**
- **objects to the housing targets being treated as minima.**
- **requires clarification on the policy for wheelchair accessible housing.**
- **supports in principle the approach to affordable housing set out in the Plan.**
- **however, draws the Mayor's attention to the fact that without additional social housing grant, the targets for affordable housing in Islington are unachievable.**
- **recommends that the policies on affordable housing targets (3A.7&8) should be strengthened, as they currently leave too much flexibility for developers to avoid making a contribution.**
- **objects to the absence of a policy to require the provision of affordable housing from commercial schemes.**
- **objects to the method of calculating commuted sums, set out in para 3A.10 and to the requirement in 3A.9 that the exceptional circumstances where these will be allowed should be listed in UDPs.**
- **requires clarification as to how mixed and balanced communities can be achieved in areas which already have a high percentage of social housing.**
- **objects to the policy on housing density. All the specific figures should be deleted and replaced with a criteria based policy similar to that included in Islington's UDP.**

## Section 4 Economic Development

Most of the policy and analysis relating to economic development is included in chapter 3B, although there is some overlap with the spatial policies in Chapter 2. Chapter 3B covers the economic context, the demand and supply of office accommodation, growth sectors and 'sectors in transition' and the need to improve skills and employment opportunities. The Draft Plan highlights the huge pressure for office based growth, particularly within the Central Activities Zone:

2001-2016	Projected Growth in Office Jobs	New Office Floorspace Required
<b>CAZ</b>	<b>197,000 (43% of London total)</b>	<b>3.4 million sq metres</b>
<b>Rest of Central and East London</b>	<b>168,000 (36% of London total)</b>	<b>3.0 million sq metres</b>
<b>Rest of London</b>	<b>98,000 (21% of London total)</b>	<b>1.7 million sq metres</b>

[As a comparison, the main tower at Canary Wharf - One Canada Place - contains 130,000 sq metres of floorspace - equal to about 1/60<sup>th</sup> of the 8.1m total].

On the other hand, the number of jobs in manufacturing are forecast to fall by 41%. Nevertheless the Plan recognises the important role of manufacturing in London's economy and aims to match demand for manufacturing by ensuring a supply that meets the needs of the sector in terms of space, location and environment.

The policies in this chapter have the following aims:

- to work with partners to develop London's 'world city' economy.
- to encourage additional office floorspace in the CAZ and in other key locations such as the Opportunity Areas and in Town Centres.
- to protect and rejuvenate existing office stock.
- to promote mixed use, particularly residential within employment schemes.
- to support strategic employment locations for manufacturing and wholesaling (of which there are none in Islington).
- to support innovation, ICT infrastructure, e-business and creative industries.
- to develop a tourist strategy.
- to support green industries.
- to improve skills.

### Comments

4.1 This part of the Plan is linked closely to the spatial strategy discussed earlier, and there are therefore similar concerns about the ability of London's infrastructure to cope with the level of growth proposed. (As an example, recent development at Canary Wharf has resulted in the recently completed Jubilee Line already becoming close to its maximum capacity). It is also difficult to assess from the Plan whether the growth projection reflects the discredited 'predict and provide' approach previously used for housing - ie is the plan seeking to provide for growth or to manage it?

4.2 As stated above most of the development pressure is within central London. 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.

4.3 Growth in these the e-industries and in the cultural sector will not necessarily be concentrated on the 'city fringes' (however defined). Cultural diversity and local regeneration initiatives may occur across a wider area, even internationally as a 'world

city'. Islington should benefit from this. Paragraph 3B.42 lists various locations where key creative industries are clustered and it is considered that Islington should be added to the examples given.

4.4 Despite these reservations there is much in this section of the Plan that supports Islington's policies, such as the support for innovation, green industries, improving skills and improving access to jobs by those who most need them.

**Relevant representations were included in section 2. In addition, the Council:**

- **objects to the lack of robust policies to protect business floorspace, particularly that suitable for small firms.**
- **requests the Mayor to provide additional information on the scale of development likely to be required in Islington, and whether this is achievable both in terms of the amount of development itself and the infrastructure necessary to support it.**
- **suggests that Islington is added to the locations listed in paragraph 3B.42 as being appropriate for clustering of cultural activities.**

## **Section 5 Transport**

The majority of the policies for Transport are in Chapter 3C of the Plan. As would be expected the Draft Plan reflects the aims set out in the Mayor's Transport Strategy, which was published in July 2001, although a key aim is to link this with the Plan's spatial policies. 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.

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;
- East London Line: extensions through centre of the borough to Highbury & Islington and Finsbury Park. This is part of a wider proposal called Orbirail.
- Channel Tunnel Rail Link to King's Cross;
- Cross River Transit Scheme (Trams) serving the King's Cross Area of Opportunity in Camden.

Access to town centres and local centres should be improved by better bus and rail services, including enhancing bus priority networks.

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.

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.

## Comments

5.1 The closer co-ordination of public transport accessibility and capacity with land use development is a key requirement. However the Mayor's Transport Strategy indicates that, even with the implementation of the measures set out in strategy, most of the Underground network in the Borough will remain crowded or very crowded in 2011. The London Plan admits (Para 2A.38) that several of the key projects are unlikely to meet their planned implementation dates, so the actual 2011 outcome is likely to be even worse than the MTS predicts. It therefore appears that the Mayor is seeking to direct growth to Central London (including Islington) without providing the additional transport capacity that is required to sustain that growth. It follows that if Central London is to accommodate the growth outlined in the London Plan, additional transport investment is needed if travelling conditions in the Borough are to improve. It is considered that the Mayor should provide transport modelling work to the boroughs to demonstrate the transport capacity impacts of the indicative development phasing set out in the Plan (Table 5.1). The Council should not agree to support these targets unless the means to achieve them, in the form of improved transport capacity, are put in place.

5.2 It is recommended that the Council supports the aims of the Plan to reduce road traffic, increase public transport and improve conditions for walking and cycling. However the Plan lacks clear targets to increase walking, cycling and public transport use.

5.3 In addition to the transport schemes mentioned in the Draft Plan, the inclusion of new stations on the North London line, to serve the new development at King's Cross, and on the Gospel Oak/Barking line at Tufnell Park to create a public transport hub and interchange, would support the Council's aims. The Plan should also include a stronger commitment to Orbirail, as at present it contains no information about when this might take place, nor what its costs and benefits might be. It is also important that improvements to public transport take place in the congested north-south corridor through Islington into the City, as this is vital for Islington residents to access jobs and services.

5.4 The restraint based approach to car use and parking is welcomed. However, the maximum car parking standards are less restrictive than currently imposed in Islington. The car parking standards are primarily based on the accessibility of the site to public transport, and the Plan does not take account of factors such as design and site characteristics, which can also warrant a reduction in car parking. For example, bringing listed buildings back into use may require car parking provision to be constrained. The Draft Plan should only give guidance on indicative standards and not require boroughs to adopt less restrictive parking standards than they already have.

5.5 The use of Public Transport Accessibility Levels (PTALs) in assisting the determination of appropriate car parking provision for new development is generally welcomed so long as it does not result in an increased level of parking. Transport for London (TfL) would provide information to the boroughs on this as part of the consideration of development proposals. However, the Draft Plan states that there may be a charge for this specialist service. Given that TfL forms part of the GLA family and the boroughs contribute information to enable strategic monitoring, it would seem inappropriate to charge for the TfL's service.

5.6 That being said the use of PTAL as in Table 2 (p.360) does not offer, by itself, a clear definition of areas for development control purposes. The pixel data produces a

jagged line, open to interpretation, and it is possible to descend from public transport accessibility level 6 to level 2 within 220 yards or so. The appearance of level 2 within two categories, 'beyond the 10 minute catchment area' and 'remote', does not help the interpretation. However the approach does offer the opportunity to refine standards to reflect differences between areas whilst the case for the continued application of the Council's adopted UDP standards will need to be reinforced through further analysis and consultation.

5.7 More could be done in the Draft Plan to reduce the impact of the private car and achieve more sustainable development, tackling congestion and reducing traffic. For example there is no policy in the Draft Plan for car-free housing developments. These are promoted by Islington in appropriate locations, and use the land more efficiently. The application of Transport Assessments and Green Travel Plans is unclear. Green Travel Plans in particular can introduce incentives to use alternatives to the private car.

5.8 The proposed policy on heliports could be stronger in resisting heliport development within densely populated areas, as the adverse impacts such as noise and the safety implications are unlikely to be overcome satisfactorily.

5.9 There are also a number of errors on the map depicting transport schemes and major development opportunities that need to be corrected.

**The Council supports:**

- **policy 3C.5 (Airport development) as it recognises that with the development of the Thames Gateway and East London it is vital to provide more capacity towards the East of London.**
- **policy 3C.7 (Improving strategic rail services) as it recognises and supports the Channel Tunnel Rail Link and the regeneration benefits it will bring to the King's Cross area.**
- **policy 3C.8 (Increasing the capacity, quality and integration of public transport) in its aim of increasing the capacity and improving the quality of the public transport system.**
- **policy 3C.9 (New cross-London links) as it reflects Islington's aims of supporting regeneration in key areas and improving public transport capacity by implementing Crossrail 1, Crossrail 2 and Thamelink 2000**
- **policies to improve conditions for buses, walking and cycling (3C.17-19).**
- **paragraph 16 in Annex 4 (Parking standards) as it confirms that the sequential test is the primary consideration to avoid PTALs being used to justify out of centre development.**

**The Council objects to:**

- **policy 3C.2 (Matching development to transport capacity) as it is unclear what scale of development should include a Transport Assessment and Green Travel Plan.**
- **policy 3C.6 (Heliport development) as it should be stronger in resisting such development, which should only be allowed in exceptional circumstances.**
- **policy 3C.10 (An enhanced London National Rail Network) as it should mention a new stations on the North London Line to serve King's Cross and the Gospel Oak/Barking Line at Tufnell Park, and it should include firmer proposals for Orbirail. The inclusion of the other schemes mentioned in the policy is supported.**
- **policy 3C.20 (Parking Strategy) as standards are less restrictive than Islington's. The policy**

should recognise that more restrictive standards may be more appropriate and that the standards in the Draft Plan are only for guidance.

- the lack of a policy promoting car-free housing and car-reduced housing.
- paragraph 17 of Annex 4 (Parking standards) as TfL should not charge the boroughs for PTAL technical guidance for planning and development control purposes.

In addition:

- the Mayor is asked to provide transport modelling work in order to demonstrate the transport capacity impacts of the his indicative development phasing targets set out in Table 5.1.
- the word ‘appropriate’ is added before ‘bus layover and turning areas’ in policy 3C.17.

## Section 6 Town Centres

Town centres are supported and promoted in the Draft Plan (Chapter 3D). A mix of uses, including retail, leisure and community facilities, combined with the accessibility of town centres, provides 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 for new development.

The Draft Plan includes a strategic town centre network and identifies the following centres in Islington:

- **Major Centres**, including the Angel where the viability and access is to be maintained and enhanced, and the Nags Head: where the potential for regeneration and increasing the benefit to the community should be realised.
- **Archway District Centre**, where the viability and access is to be maintained and enhanced.

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.

### Comments

6.1 The use of the sequential test for retail and leisure developments is welcomed as this will help to maintain and enhance the vitality and viability of existing 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. However, the policies covering these aspects could be more consistent.

6.2 The threshold for which a major leisure development would be required to be subject to the sequential approach is set at proposals over 2500 square metres. Major leisure development is defined in PPG13 as above a threshold of 1000 square metres for applying parking standards and transport assessments. No justification is given for the 2500 square metre figure used in the Draft Plan and it would be more appropriate if the thresholds were consistent with national policy. On this topic there is also a confusing reference in the supporting text that implies there would be no sequential testing required

in Central London. This is out of step with other policies in the Plan that supports and protects the vitality and viability of the town centre network.

6.3 The Nag's Head is listed as a major centre in Annex 4, (p.374) with a regeneration policy objective to 'realise the potential of centres with surplus capacity to enable them to benefit the local community and contribute to the regeneration of the wider area.' This supports the Council's current bid for funding various transport improvements along the A1 Corridor, including the Nag's Head.

6.4 The Draft Plan also provides support for protecting local retail services and community facilities outside town centres. These can promote sustainable development by reducing the need to travel.

6.5 While the Draft Plan includes a policy that refers to international and national stadia it leaves it to the boroughs to designate suitable locations. As the London Plan is a strategic document it should identify such locations as these developments will have more than a local impact.

6.6 A London-wide target is set for additional hotel bedrooms at 36,000 by 2016. However, this target is not broken down further. The policy implies that it will be concentrated in the Central London area.

**The Council supports:**

- **policy 3D.3 (Maintaining and improving retail facilities) as it supports local facilities that meet local needs, hence reducing the need to travel.**
- **paragraph 3D.18 as it protects the vitality and viability of town centres. However this should be made into a policy as it clarifies the sequential approach. An additional criteria, stating that land protected or designated for another use is not suitable, would strengthen the policy.**

**The Council objects to:**

- **policy 2A.5 (A sequential approach to site selection) as it does not refer to town centres for locating large retail and leisure uses and could lead to such development locating in out of centre locations.**
- **policy 3D.1 (Supporting town centres) as it should encourage leisure and large trip generators to locate in town centres along with retail uses, and should explicitly mention the sequential approach.**
- **policy 3D.2 (Retail and leisure development in town centres) as it should explicitly refer to the sequential approach to avoid any confusion. Developments in District Centres that might prejudice the vitality or viability of a major centre should not be permitted.**
- **paragraph 3D.7 as it does not include retail use as a town centre role.**
- **policy 3D.5 (Major leisure development) as the threshold of requiring a sequential approach is set too high at 2500 square metres. If a threshold is to be used then it should be set at 1000 square metres.**
- **paragraph 3D.29 as it appears to remove the requirement for a sequential test for major leisure proposals within Central London. In addition, the area covered by Central London is not defined in the Plan. However the criteria listed at the top of page 210 are supported and should be included in the Policy 3D.29**
- **policy 3D.6 (Sports facilities) as it does not identify suitable locations for international and**

**national stadia.**

- **policy 3D.7 (Visitor accommodation and facilities) as the policy is vague and does not break down the target for new hotel bedrooms, concentrating development within Central London, which is not a defined area in the Plan.**

## Section 7 Open Space

Chapter 3D of the Draft Plan sets out policies to protect the network of open spaces in London ranging from the Green Belt and Metropolitan Open Land (MOL) 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.

A new designation for waterways in London called the Blue Ribbon Network is included in the Draft Plan, identifying the Regent's Canal in Islington. The policy seeks to enhance the use and value of the waterways for leisure and transport, while ensuring that development on the banks contributes to the canalside environment. Some of the detailed Blue Ribbon Network policies appear in Annex 2 of the Draft Plan, although it is stated that they have the same weight as the rest of the Plan.

### Comments

7.1 The Plan generally supports Islington's Greenspace policies. 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 MOL 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.

7.2 However the protection for local open spaces in the Plan is weaker than Islington's policies, despite numerous references throughout the Draft Plan that recognise its value and importance. 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 provision 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. The policies in the Draft Plan create uncertainty and could result in the loss of open space due to the pressure for housing development.

7.3 The concept and identification of the Blue Ribbon Network is welcomed. This supports the Council's policies for protecting the character and opening up access to the Regent's Canal.

7.4 How the detailed Blue Ribbon Network policies relate to Conservation Areas needs to be clarified as the heritage of the Regent's Canal is an important aspect for Islington. The Draft Plan suggests that such designations could be a break on achieving other priorities. However, this is contrary to the need to protect and respect the character of an area and that successful regeneration can be conservation-led. It is considered that this is not what is intended but the approach needs to be clarified in order to avoid misinterpretation.

**The Council supports:**

- **policy 2A.10 (London's network of open space) as it offers protection for open spaces in London.**
- **policies 2A.11-13 (Blue Ribbon Network) as they help to underpin Islington's policies protecting the character of the Regent's Canal.**
- **policy 3D.8 (Realising the value of open space) as it recognises the value of open space in the urban environment.**
- **paragraph 3D.42 as it recognises that the value of open space will increase as land uses in the capital intensify and that poor quality is not a reason to justify the loss of open space. These sentiments should be made into a policy and explicitly apply to local open spaces as well as Green Belt and Metropolitan Open Land (MOL)**
- **inclusion of open space hierarchy in Table 3D.1.**
- **policy 3D.12 (Biodiversity and nature conservation) as it underpins the protection of nature conservation sites in Islington.**

**The Council objects to:**

- **policy 3D.10 (Protecting open spaces) as it does not offer sufficiently robust protection for local open spaces and does not make clear what an ancillary use is on MOL.**
- **paragraph 3D.51 as it suggests that private sports grounds are redeveloped rather than protected and made publicly accessible.**
- **policy BR13 (Conservation Areas) and paragraph 35 in Annex 2 (Blue Ribbon Network) as these should recognise that water areas can make a significant contribution to the character of a conservation area and CA designation will be desirable in certain circumstances.**

## **Section 8 Waste and Pollution**

Planning for waste is one of the 'cross-cutting' themes covered in section 4 of the Draft Plan. In order to reduce landfill and export of waste outside London the Draft 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. However, the Plan does not support an expansion of new incinerator capacity.

Policies also cover the reuse of building materials, reducing air pollution, ensuring a high quality water supply and noise reduction.

### **Comments**

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

8.2 The Plan contains targets to increase household recycling that is consistent with Islington's policy and targets set down by the Environment Agency. However, the Plan goes on to state that it will seek to increase these targets by pursuing legislative changes

in the future. Such an increase is likely to require extra funding and needs to be fully explored to ensure that a realistic and achievable target is set. It is also not clear why such an ambition needs to be included as part of a development plan policy.

8.3 The Mayor states an intention to seek powers to prepare a London-wide Waste Local Plan. It is not clear how this would affect the current waste authority set-up, which has Islington as part of the North London Waste Authority. No justification is given on the need to change the existing system. In addition, the Mayor is already required to prepare a strategy on Municipal Waste, which would set out the priorities and objectives for London.

8.4 The Council's Head of Public Protection has no objection to the policies relating to pollution.

**The Council supports:**

- **policy 4A.2 (Spatial policies for waste management) as it supports the proximity principle.**
- **policy 4A.6 (Improving air quality), Policy 4A.11 (Water supply and quality) and Policy 4A.12 (Reducing noise) as these are consistent with Islington's policy.**

**The Council objects to:**

- **policy 4A.1(Waste Strategy and targets) as it includes an ambition to increase targets in the future that need not form part of the policy. With this amendment the strategy set out in the policy would be supported.**
- **the Mayor seeking powers to produce a London-wide Waste Local Plan as no justification is given to the need to replace the existing system. It is considered that the Mayor's Municipal Waste strategy is the appropriate vehicle for the London-wide level.**

## Section 9 Energy

A number of policies are included in the Plan (page 233 onwards) that promote improvements in the use of natural resources. The Plan seeks to increase energy efficiency and the use of renewable sources of power.

### Comments

9.1 The Plan's objectives for energy efficiency and renewable energies reflect the Council's aims. The Council's Energy Manager is broadly supportive of the relevant policies, which are drawn from the Mayor's Energy Strategy. The Council has been actively involved in the preparation of on this latter document.

9.2 The Draft Plan states that an energy demand assessment should form part of major development proposals, although major development is not defined. This creates uncertainty on what scale of development is appropriate for such an assessment and could lead to inconsistencies.

9.3 Support is given for building mounted wind power schemes and refers to criteria that is yet to be developed for identifying sites for wind turbine schemes. The support for wind power schemes needs to be balanced against noise, appearance and other impacts that could be to the detriment of the quality of the urban environment. These need to be

fully explored before implementing such schemes. Instead the Plan could acknowledge the potential of wind power, subject to further research and the development of appropriate criteria.

9.4 The need to develop the use of alternative fuels and quieter vehicles could also usefully be added to the Plan.

**The Council supports:**

- **policy 4A.7 (Energy efficiency and renewable energy) as it is consistent with the aims of Islington's policies.**

**The Council objects to:**

- **policy 4A.8 (Energy assessment) as it should define the types of major development where an energy assessment is required.**
- **policy 4A.10 (Supporting the provision of renewable energy) as it should be based on properly researched criteria to ensure that wind power schemes on buildings make a positive contribution to the urban environment.**

## Section 10 Sustainable Development

Sustainable development is one of the three main themes that run through the whole Draft Plan. Policies are found in all sections of the Plan and cover issues including design, construction, recycling and promoting the use of previously developed land. Waste and energy policies are linked into sustainability issues and are dealt with in previous sections of this document.

### Comments

10.1 The emphasis on sustainable development in the Draft Plan is welcomed. However, it is applied inconsistently in parts of the Plan and more could be done to ensure that the aims of sustainable development are filtered down into the planning process at the local level. Islington's new UDP encourages developers to undertake a Sustainability Assessment as part of a planning application to show how environmental, economic and social factors have been taken into consideration. Such an assessment identifies the positive and negative impacts of the proposal and allows the opportunity for these to be addressed as part of bringing a proposal forward, rather than as an add-on at the end. Such a comprehensive approach would benefit the Draft Plan by bringing together a number of different requirements spread across different policies, placing sustainability in a more central and coherent position. This also has the advantage of underpinning the need for such assessments in the planning process at the local level.

10.2 Previously developed sites are promoted for locating new development and a sequential approach is applied to large retail and leisure uses. These measures link into the sustainability goals of the Draft Plan but are not always consistent.

**The Council supports:**

- **policies (2A.6 Sustainability criteria and 4B.6 Sustainable design and construction) as they promote sustainable development. Support is subject to the inclusion of a requirement for**

**comprehensive sustainability assessments, reinforcing the central vision of the Draft Plan to develop London as an exemplary sustainable city.**

**The Council objects to:**

- **policy 2A.5 (A sequential approach to site selection) as the third bullet point could in some circumstances be construed as supporting greenfield development before using brownfield sites.**
- **policy 3A.26 (Social and economic impact assessments) and paragraph 3A.29 as these limit the appraisal of large residential proposals and sites in or near Regeneration Areas to social and economic factors. Environmental and transport criteria should also be included as part of a wider sustainability assessment as an integrated part of the planning process**
- **paragraphs 5.53-5.56 as they fail to make reference to the sequential approach and the need to maintain local facilities to meet local needs, thereby reducing the need to travel.**
- **the lack of co-ordination of assessing the sustainability of proposals (including policies 2A.6, 3A.26, 4A.8, 4B.5, 4B.6), which could be improved by requiring a comprehensive sustainability assessment as part of the planning process to show how environmental, economic, access and social factors have been considered.**
- **the amount of development on brownfield land should be monitored annually as a key performance measure with a target of 100%. This would reflect the aim of the Draft Plan of focusing regeneration on previously developed land, particularly in East London.**

## **Section 11 Built Environment and Design**

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 (Section 4D).

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 locations where there is major public transport capacity. The Draft Plan (page 248) states that Boroughs should not impose blanket height restrictions.

The contribution of London's built heritage is recognised, particularly in the opportunities for regenerating neglected areas. The restoration and reuse of vacant and/or at risk historic buildings and places can contribute to community and economic renewal.

The Draft Plan puts forward proposals to amend the protected strategic views of St. Paul's Cathedral (Policy 4B.12 and in Annex 3). Three of the viewing corridors identified pass across the Borough from the following locations: Alexandra Palace, Kenwood and Parliament Hill.

### **Comments**

11.1 It is considered that the Council should support the policies in the London Plan that seek to improve the design of new development - including in principle those that seek to maximise the potential of development sites. The Draft Plan also sets out protection for local characteristics against adverse impact from new development. This

could help to sustain Islington's policies that seek to protect the special character of areas such as Clerkenwell.

11.2 Policies also recognise and require high standards for accessibility, particularly for disabled people, to be integrated into new developments.

11.3 The Draft London Plan supports tall buildings as an efficient way of using space in certain locations and states that clusters would be appropriate in the CAZ. However, tall buildings have an effect on a wide area, which can often be detrimental. In addition, the Plan is against blanket restrictions on the height of tall buildings. Policy 4B.9 sets out detailed criteria (mostly subjective, it must be said) which should be used to weigh proposals for tall buildings against any possible adverse impact on local character. It could be argued that this conflicts other with policies in the Plan that seek to protect the character and distinctiveness of local areas.

11.4 Currently, Islington's UDP policy resists development over 30 metres in height throughout the Borough. This 'blanket ban' is based on an analysis of Islington's character, and an understanding of the potential damage that high buildings can cause to the domestic scale of architecture that dominates Islington. There are no clusters of high buildings in Islington, and the majority of the few high buildings that do exist are damaging and unpopular. There may be a few sites in the borough where high buildings can be built and these can be progressed as departures from the UDP, with the onus on the applicant to demonstrate that the proposal should go ahead.

11.5 The Plan retains all of London's existing 'Strategic Views' of St Pauls and the Palace of Westminster, with the exception of that from Richmond Park (which is deleted) and from Westminster Pier, which is redesignated as a 'river prospect'. Neither of these changes affect Islington directly. However the remaining Strategic Views are redesignated as 'London Panoramas' implying that the overall content of the view is as important as the specific sight-lines to St Pauls. The Plan also introduces the concept of river prospects and townscape views - but none of the views identified affect Islington. Finally it proposes that management plans are prepared for the views, which should look at the front and middle grounds of the views and principles of good design, as well as specific corridors and thresholds.

11.6 The Plan's approach to views is more sophisticated than that set out in RPG3 and should be supported. The principal weakness of the Plan is its failure to recognise the importance of local views. Whilst the designation of such views is clearly a matter for the boroughs, in-principle support for their designation should be included in the London Plan.

**The Council supports:**

- **policy 4B.1 (Design for a compact city) as it encourages the efficient use of land and promotes the use of urban design statements as part of planning proposals.**
- **policy 4B.5 (Creating an inclusive environment) as it promotes new development to be accessible and inclusive, including the specific needs of disabled people.**
- **policy 4B.7 (Respect local context and communities) as it recognises the need to protect the special character of local areas from damaging development.**
- **policy 4B.11 (Historic conservation-led regeneration) as it recognises that such assets can make a positive contribution to regeneration.**

**The Council objects to:**

- **policy 4B.8 (Tall buildings - location) as it should provide stricter limitations on major clusters of tall buildings and should not support stand-alone tall buildings. Boroughs should be allowed to set height restrictions (assuming these are based on a proper analysis of the need for and impact of high buildings in their area) so that that local character and distinctiveness is protected.**
- **paragraph 4B.24 as tall buildings do not necessarily achieve the aims of sustainable development as they can cause local micro-climate, impact on a wide area that could adversely affect local character and can cause undue pressure on local services, facilities and infrastructure.**
- **policy 4B.9 (Large scale buildings - design) as it assumes the benefits of tall buildings are intrinsic, although some of the criteria are subjective such as fitting into their surroundings, contribution to the skyline and attractiveness.**
- **policy 4B.10 (Historic conservation) as it should specifically mention ways of recognising and protecting historic and archaeological assets, ie Conservation Areas, Listed Buildings and Archaeological Priority Areas.**

**In relation to views in London, the Council:**

- **supports the general principles set out in Policy 4B.12 and the need for management plans to be prepared, which should involve the GLA, the London Boroughs, and other relevant partners.**
- **objects to the inclusion of the specified views within an annex to the Plan. These should be included in the main body of the Plan and all the existing thresholds and corridors should be retained until such time as the management plans are agreed.**
- **objects to the lack of support for the designation of local views by the Boroughs.**

## **Section 12 Implementation; and related Issues**

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. However, S106 powers are currently exercised by the Boroughs and are negotiated with developers. The policies in the Plan also refer to working with the Boroughs and the London Development Agency in order to identify the appropriate use of Compulsory Purchase Orders (CPOs) to promote development in key areas.

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.

This section of the Plan also makes further reference to the 18 additional supplementary planning guidance notes that the Mayor will produce, on topics ranging from sub-regional spatial frameworks to assessing retail need. These are intended to give further advice to the Boroughs and the Mayor proposes that Council's should have regard to them in preparing their policies and in determining planning applications.

## Comments

12.1 The Plan seeks a wider role for the Mayor in dealing with Section 106 Agreements, which currently falls within the remit of the London Boroughs. Essentially the Mayor is attempting to pool funds in order to pursue the priorities in the London Plan. This will remove the spending of monies from borough control and could mean that the communities affected by a development do not gain from any planning obligation. The Mayor currently has no powers to achieve these aims even if they were included as a policy in the Plan. Instead the aim of the Mayor is to seek legislative changes on the basis that the aims and priorities in the London Plan would be better served by such an amendment.

12.2 The Plan's stated aim to work in partnership with the boroughs (and others) is welcomed, but is not supported by the Mayor's track record to date. The Mayor has stated publicly that developers should by-pass local Councils and go directly to him; and he has been dismissive of locally agreed planning policies. The Draft Plan was produced on a confidential basis. the consultation period is too short and straddles the summer holiday period, and finally only a handful of the research reports supporting the plan were published before the start of the consultation period (See Table 2 below). This has made it impossible for Council officers to prepare a fully informed response to the Plan.

12.3 In addition, the Mayor wishes to get involved in more detailed planning matters such as area development frameworks, action plans and initiating urban regeneration companies for strategically important sites. It is considered that the London Plan should provide the strategic context for planning and that the boroughs are the appropriate body to lead on detailed planning matters at the local level. The reforms of the planning system being progressed by the Government state that it is for the local planning authorities to produce frameworks and area action plans. The Mayor's role should clearly be at the strategic level in this process and not in the detailed preparation process unless this is agreed by the local council concerned. It is recognised that the Mayor might have a useful role in those cases where planning or development frameworks cover more than one borough. However even in these cases the work should proceed on the basis of a consensus and should not be 'co-ordinated by the GLA' as stated in the Plan.

12.4 The fact that the performance of the Plan will be the subject of an Annual Review is welcomed. However, some of the performance measures are in conflict with the stated sustainability aims and other topic areas will not be monitored. Even though the growth forecasted by the Plan is dependent on the implementation of a number of major public transport schemes, only two of these are included as performance measures.

12.5 A wide range of additional documents would be produced by the Mayor as supplementary planning guidance (SPG - see Table 1) 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. This is contrary to the Government's reforms of the planning system, which the Mayor supports, that seek to streamline and minimise the amount of planning guidance produced. In addition, there is no over-riding policy setting out how the SPGs will be prepared, who will be involved, how they will be adopted or what status they will have.

12.6 Some of these additional documents could provide useful information for the boroughs to adapt to their particular local circumstances. It is considered that all the Mayor's proposed 'policy' spg's should have the status of guidance notes that provide either a research basis or an action toolkit to assist boroughs in developing policy at the local level. These documents should not have the status of supplementary planning guidance. (Representations relating to area based spg (ie the sub-regional plans) are set out in Section 2).

12.7 The Plan seeks to influence Community Strategies (policy 3A.24) - stating that these need to be in line with the Mayor's objectives. However Local Strategic Partnerships (para 5.78, p.281-282) are not supported as they "are at risk of creating yet further confusion and duplication in already crowded areas" and do not improve co-ordination. In contrast the Plan supports the preparation of development frameworks or plans produced by communities or neighbourhood organisations as part of strengthening Neighbourhood Renewal Strategies. These are important issues for the Council, but not ones that can be resolved at this stage. This is clearly an area where the ALG may wish to lead. The Plan suggests "a joint review of current structures, looking to improve ways of local co-ordination". It is recommended that this is supported in principle, but that the outcomes should remain 'local' and under local direction.

12.8 The Central London Partnership (CLP) is not specifically listed in 'Annex 7 partnerships that can help to deliver the London Plan', but is obviously one of the 'sub-regional partnerships' (p.389). The CLP includes the City Corporation, which is a further argument for retaining the city in the Central Sub-region. The EC1 New Deal is also not mentioned, but is obviously a 'local strategic partnership' (p.390).

12.9 The glossary could be expanded. An index of abbreviations should be provided. In a similar vein, the table of contents should be expanded to include more sections and page numbers. [It is a difficult document to refer to]. The Annexes should be listed with their page numbers in the contents.

12.10 Finally it should be noted that maps throughout the Plan contain numerous errors. The Mayor's attention will be drawn to these and to any other minor corrections needed including those referred to in paragraphs 12.8 and 12.9 above. Many of the maps are too small to be readily understood - the map of walking routes on page 195 being a typical example. It is important that clearer maps (albeit with a 'broad-brush' design) are available for the boroughs to check, and that better maps are included in the final version of the Plan.

**The Council supports:**

- **policy 5.1 (Working in partnership) as it promotes a collaborative approach with the boroughs, which should be reflected throughout the Plan. However the principle of subsidiarity should apply with the Mayor concentrating on strategic issues, with local decisions taken at the local level.**
- **policy 5.9 (Measuring progress) as it commits the Mayor to an annual review of the performance of the Plan.**

**The Council objects to:**

- **policy 5.2 (Promoting development) as the Mayor should not be getting involved in detailed local area planning nor initiate urban regeneration companies without the consent and support of the boroughs.**
- **policy 5.3 (Priorities in planning obligations) as this would effectively remove funds out of the borough to allow the Mayor to pursue the priorities of the Draft Plan, rather than the benefit going to the community affected by the development. The policy is premature as the Mayor has no power to appropriate s106 funds and should be deleted.**
- **policy 5.4 (Planning obligations) and Policy 5.5 (Securing adequate funding) as it is inappropriate to have policies promoting a wider role for the Mayor, resulting in the loss of ability for boroughs to use s106 monies at the local level, where there are no existing powers to achieve this.**

- **table 5.4 (Key performance measures) as it sets development capacity to meet market needs without any corresponding measure for the quality of the environment, including the protection and provision of open space. All the major public transport schemes and a wider range of travel modes should also be monitored.**
- **the lack of a policy setting out how the SPGs referred to in the Draft Plan will be prepared, who will be involved, how they will be adopted or what status they will have. It is considered that these documents should only provide guidance or advice, and should not have the status of supplementary planning guidance.**
- **the small scale and lack of legibility of some of the maps, and requests that larger versions are provided to the boroughs for checking.**
- **the inadequate consultation period on the Draft Plan, and the failure of the GLA to produce the necessary supporting documents prior to the Plan's publication.**