Islington Core Strategy Examination
Inspector’s Preliminary Questions

This note flags up certain matters on which I am seeking clarification before the examination proceeds much further. The first section is to aid me in checking compliance with the legal requirements. The questions in the following sections are seeking information to assist my assessment of the soundness of the submitted Core Strategy (CS).

It would greatly assist the efficiency of the examination for the Council to prepare a full written response addressing these questions, to be tabled no later than 6 September 2010. If this response refers to evidence that is not before the examination, such evidence should also be tabled. Should preparation of the response prompt the Council to suggest minor changes to clarify and strengthen the submitted CS, the precise changes proposed should be set out in a separate schedule.

1 Legal Requirements
a) Have Natural England and other statutory consultees had opportunity to comment on the Habitats Directive Screening Assessment (CD012) and if so, what were their views on its findings?

b) What progress has been made with resolving the question of general conformity with the London Plan regarding bus provision at Archway?

2 Policy ‘audit trail’
Planning Policy Statement 12: Local Spatial Planning (PPS12) expects CS to make clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent Development Plan Documents (DPDs) is reduced. Thus there need to be explicit links between the submitted CS and the subsequent DPDs and Supplementary Planning Documents (SPDs) that are to be produced as part of the Local Development Framework (LDF). The CS should provide the strategic framework and guiding principles on which these subsequent LDF documents will be based. Against this background please clarify:

a) Finsbury Park Area Action Plan (AAP) – this is in the latest Local Development Scheme (CD019) although there is no reference in the CS. Is it still the intention to prepare this AAP? How far has it progressed and does any preparation work for this AAP inform the spatial strategy for this area in Policy 2, or form part of the evidence base for the CS?

b) Bunhill and Clerkenwell AAP – the supporting text to Policy 7 explains that the CS provides the strategic direction for this AAP. As regards headline figures, how many new jobs and homes does the CS anticipate will be delivered through this AAP? What is this AAP expected to deliver in terms of the various elements of policy 7, and policy 9E?

c) Archway Development Framework, Angel and Nags Head Town Centre Strategies, Kings Cross Neighbourhood Framework – what is the linkage between these adopted SPDs and the spatial policies in
the CS, and how have these SPDs informed the strategic direction of the CS?

d) Development Management Policies DPD and Site Specific Allocations DPD – there are references to these DPDs throughout the CS. What is their role in delivery of the CS policies?

e) North London Waste Plan – do the policies or proposals of this emerging joint plan have any significant implications for the strategic spatial framework for Islington? What are the implications of the revised waste arisings and apportionments in the London Plan 2009?

3 Housing Supply

a) There is useful background information in the Topic Papers (CD020, CD024, CD028) and the Annual Monitoring Report 2009 (CD018). However within the CS itself please could you clarify and confirm:

   a) The housing target(s) derived from the London Plan (both annualised and cumulative) that the CS is seeking to meet and exceed during the plan period to 2025 in terms of conventional dwellings; non self contained accommodation; and vacant units brought back into use.

   b) For conventional dwellings the anticipated supply from ‘known’ sites and separately from windfalls on sites under 0.25 hectares for the 1-5 year; 6-10 year; and 11-15 year period of the plan.

   c) The anticipated contribution from each of the Key Areas and the likely time period during which this will be delivered. How does this fit with the information in Appendix 7 of CD020?

b) 6 – 10 year period

The Housing Supply topic paper indicates that delivery of 4448 conventional homes is anticipated from all sources for this period, which is less than the target derived from the current London Plan (4960) or the draft replacement London Plan (4610). How is it intended to address this apparent shortfall in supply?

c) Student Accommodation

The CS seeks to focus provision of student accommodation within 2 defined university campus areas. I note that the target for non self contained housing in the plan period derived from the current London Plan is 1995 units, with the draft replacement London Plan setting a target of 3750 units. In broad terms, is there a reasonable prospect that this level of new accommodation can be delivered in the two locations identified in the CS during the plan period? What is the evidence base for this?

d) Small windfall sites

PPS3: Housing revised in July 2010 now excludes garden land from the definition of previously developed land. What are the implications of this revision for anticipated levels of small windfall sites (under 0.25 hectares)? Is there likely to be a significant impact on the estimated level of 544 dwellings per year from such sites as an element of overall supply?
4 Employment
   a) Job Growth
   Again the topic papers (CD022, CD028) and AMR 2009 provide useful background. However job growth targets within the CS itself are less clear. In particular there seems to be a mismatch with the figures presented in Tables 1 and 2 of CD022. Please confirm:
      a) The overall job growth target for the Borough during the plan period;
      b) The contribution of the 3 Key Areas within the Central Activity Zone (CAZ) to job growth and how this is divided between them and phased over time;
      c) Anticipated job growth in the other 4 Key Areas.

b) Designated boundaries
   In which subsequent DPD will the boundary of the Locally Significant Industrial Site at Vale Royal/Brewery Road and associated policy be defined?
   What is the basis for defining the boundary of the CAZ shown on the Proposed Submission Proposals Map (SD007)? Does this reflect relevant policy in the emerging London Plan?

c) Retail Provision
   How is it envisaged that the overall expansion in retail provision at Archway planned in Policy 1 will be delivered? How will this be supported by the Development Management Policies DPD?

5 Cross Boundary Issues
   a) Neighbouring Authorities
   PPS12 paragraph 4.45 expects a CS to be coherent with those for neighbouring authorities. I note that several Key Areas are close to the Borough boundary, or are within the CAZ. How does the spatial strategy in Islington's CS align with the relevant strategies of neighbouring authorities?

b) London Plan
   Are there any significant differences between the draft replacement London Plan and the adopted London Plan that could have implications for Islington CS?
   I note that examination of the replacement London Plan is broadly concurrent with that for the Islington CS. How would the implications of any significant changes in the adopted regional plan be handled within the Islington LDF?

6 Infrastructure Delivery
   a) Overview
   Drawing on the analysis of physical, social and green infrastructure supporting the CS, are there any aspects which are critical to delivery of the planned growth and change? What elements of this infrastructure are essential drivers for delivery of the anticipated growth in the Key Areas? How will an overview of infrastructure be maintained and delivery monitored to ensure that it successfully underpins the spatial strategy?
What management mechanisms are envisaged and what steps are being taken to put these in place?

b) Transport
What is the alignment and linkage between Islington’s Sustainable Transport Strategy and the CS? How does the CS support delivery of this Transport Strategy?
I note that some major transport capacity improvements are as yet uncommitted and delivery is outside the Borough’s control. What are the implications of this uncertainty for delivery of the planned changes in the Key Areas? How will such uncertainty be managed?

c) Sports and Recreation Provision
Policy 17E identifies refurbishment of Ironmonger Row Baths and redevelopment of Finsbury and Sobell Leisure Centres. Is there a reasonable prospect of these improvements being achieved within the plan period?

d) Surface Water Flooding
This has been identified as a high risk for development in Islington (CD011). How is this addressed within the CS? What are the implications for delivery of the planned growth and change?

e) Community Infrastructure Levy
Should the CS contain a policy ‘hook’ for the future implementation of CIL in Islington?

7) Monitoring and Managing Delivery
a) Monitoring
PPS12 expects CS to contain clear targets or measurable outcomes to enable management of delivery. Appendix 3 contains a comprehensive range of indicators, without any related targets, milestones or success factors. Please explain how these indicators will be monitored to ensure progress with delivery of the spatial policies for the Key Areas and the general strategic policies.

b) Management Mechanisms
How will delivery be managed to ensure that the homes and jobs targets are met or exceeded? What management mechanisms are envisaged? What corrective action would be taken should there be significant shortfall or overshoot within a particular Key Area or across the Borough as a whole?

c) Risks and Contingencies
What are the main risks to delivery of the spatial strategy? What contingencies are in place and how will these be handled?

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