



ISLINGTON

Consultation Statement

Local Plan Review

September 2019



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1 Introduction

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the Regulations”), Regulation 19, requires a statement setting out which bodies and persons were invited to make representations under regulation 18; how those bodies and persons were invited to make such representations; a summary of the main issues raised by those representations, and how those main issues have been addressed in the DPD, and in the local plan.
- 1.2 Islington Council are currently reviewing the Local Plan. From 5 September 2019 to 18 October 2019, the council are inviting representations on the following Proposed Submission (Regulation 19) Development Plan Documents:
 - Strategic and Development Management policies: the principal document in the Local Plan, which sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.
 - Site allocations: this document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs.
 - Bunhill and Clerkenwell Area Action Plan (AAP): a plan for the south of the borough, covering the majority of Bunhill and Clerkenwell wards, where significant change is expected to occur over the plan period. The plan sets out spatial policies covering different parts of the area with further policies to manage development.
- 1.3 This is the fourth consultation exercise undertaken for the Local Plan review, having previously undertaken the following consultation:
 - The Council consulted on the Local Plan: Scope of the Review document from 28 November 2016 to 27 February 2017. We also undertook a 'Call for Sites' consultation to identify future development sites for a range of uses. This consultation was the first stage in the formal plan production process.
 - From 12 February to 26 March 2018, the Council consulted on a Site Allocations Direction of Travel document, which identified over 150 sites where new housing, workspaces, shops, open spaces, or leisure and community facilities could be provided over the next 15 years.
 - From 20 November 2018 to 14 January 2019, the Council consulted on Regulation 18 draft versions of the Strategic and Development Management Policies, Site Allocations and Bunhill and Clerkenwell AAP documents.
- 1.4 Responses to these previous rounds of consultation have informed the Local Plan Regulation 19 proposed submission (September 2019) documents.
- 1.5 This consultation statement has been produced as an iterative ‘living’ document, and has been revised to take account of consultation responses received at various rounds of consultation. This version of the statement includes details on the Regulation 18 consultation undertaken between November 2018 and January 2019 – this satisfies the requirements of the Regulations (Regulation 19).

- 1.6 A further version of this statement will be published to include a statement detailing the number of representations made in response to the Regulation 19 consultation, and a summary of the main issues raised in those representations. This would be the final consultation statement submitted to the Secretary of State as part of the documents required under regulation 22 of the Regulations.

2 Local Plan: Scope of Review (November 2016)

- 2.1 This section sets out the details of the Regulation 18 consultation on the Local Plan: Scope of Review document. It provides details of when the consultation took place, who was consulted, and the consultation methods undertaken. The main issues that were raised during the consultation are summarised by policy area in Table 2.1. Information on how the draft Local Plan responds to these issues is also set out in this table.
- 2.2 The Regulation 18 consultation on the Scope of the Review document (which included a 'Call for Sites' exercise to inform a review of site allocations) ran for a period of 13 weeks between Monday 28 November 2016 and Monday 27 February 2017.
- 2.3 The consultation included the following:
- Notifications in local media (Islington Gazette and Islington Tribune).
 - Notification on the council's consultation website and on the 'Local Plan review' webpage of the council's website.
 - Over 6,000 letters and emails sent out to:
 - Individuals/organisations registered on the policy consultation database;
 - statutory consultation bodies;
 - the voluntary and community sector including TRAs; and
 - local businesses (identified using business rates information).
 - An online survey.
 - Copies of the Scope of Review document in libraries.
 - Presentations to with different local groups and stakeholders
- 2.4 In total, 36 email / letter responses were received, 60 survey responses (including partial completions) and 24 'call for sites' responses were received. These responses are summarised (by topic/policy area) in table 2.1 below.

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
Spatial Strategy and Key Areas	GLA, London Borough of Hackney, community groups, Historic England, and various survey respondents.	<p>Continued inclusion of spatial strategies was supported by the GLA, the London Borough of Hackney and community groups.</p> <p>Historic England set out that Area Spatial Strategies should ensure a character-led approach and that evidence should demonstrate an understanding of local and historic character.</p> <p>One survey respondent set out that Clerkenwell Green should be highlighted in the Bunhill and Clerkenwell Area Spatial Strategy. Another survey respondent set out that whilst focusing the most significant growth to the Borough's seven key areas is a useful approach at a strategic level, there remain parts of the borough outside these areas that have the potential to deliver new homes and jobs. Support was set out for the idea that Area Spatial Strategies to address not just the use of buildings but also the spaces between and around buildings.</p> <p>It was suggested that key areas adopt TfL's 'Healthy Streets' standards.</p>	<p>The draft Local Plan continues to include Area Spatial Strategies for key growth areas.</p> <p>Consideration of heritage assets and conversation areas is set out in Area Spatial Strategies and throughout the draft plan.</p> <p>Clerkenwell Green is highlighted in the draft Bunhill and Clerkenwell AAP.</p> <p>Highlighting the specific strategies for the Borough's key growth area does not preclude planning applications being submitted for elsewhere in the Borough. The draft Local Plan sets out a number of policies which will apply borough-wide.</p> <p>The draft Local Plan sets out the Council's commitment to working with TfL to deliver 'Healthy Streets'.</p>
Housing	GLA, Camden and Islington Public Health, commercial property owner, Unite Group, Rentplus, community groups, various survey respondents.	<p>The Council's approach to housing delivery and 50% affordable housing target was supported by the GLA.</p> <p>Historic England set out that new housing development should be contextually appropriate and that heritage assets should be specifically</p>	<p>The draft Local Plan sets out a requirement for a minimum of 50% of total net additional conventional housing built in the Borough to be genuinely affordable.</p> <p>The draft plan sets out that all developments must be designed to be</p>

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		<p>considered in line with National Planning Policy Guidance.</p> <p>It was set out by a commercial landowner that housing policies should be flexible to encourage, rather constrain development, and that there should be an exemption from affordable housing requirements in Farringdon to make commercial development more viable.</p> <p>There was an objection to policies which restrict student housing from student housing provider Unite Group. The response asked that the Council take a more flexible approach and in doing so, consider the projected increases in student numbers.</p> <p>Rentplus requested that the definition of affordable housing be amended to include rent to buy and argued for the removal of the affordable housing tenure split, and the insertion of wording which requires affordable home ownership products, rather than intermediate housing. Other respondents highlighted potential for delivery of other housing tenures (affordable and market).</p> <p>Concern over affordability of housing and housing for middle earners was raised from a community group.</p> <p>A significant number of respondents to the survey cited affordable housing as a key issue, calling for more social rented housing. The target of 50%</p>	<p>contextual, and must preserve or enhance heritage assets.</p> <p>The draft AAP sets out a clear priority for office space in the south of the borough. However, on sites where housing does come forward, affordable housing will still be required, given its importance to meeting housing need,</p> <p>The Draft Local Plan limits the development of student accommodation to certain locations. Significant student accommodation has been delivered over the 10-15 years and there is a greater need to prioritise conventional housing and employment growth.</p> <p>The draft Local Plan promotes genuinely affordable housing as this is the only type of housing that effectively meets housing need, and which makes best use of scarce land, Other products such as rent-to-buy will be resisted as they are not genuinely affordable.</p> <p>The 70:30 tenure split is proposed to be retained based on updated evidence. The draft plan supports London Living Rent as a suitable intermediate housing tenure, as this is let at rents affordable to those on low to moderate incomes.</p>

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		<p>affordable was supported, and there was also recognition for the need for a mix of homes, including for those on middle-incomes or not in a position to buy.</p>	<p>The draft plan sets out the council's approach to various housing tenures. Tenures which support the delivery of the council's objectives, and make the best use of land, are prioritised.</p>
Employment	<p>Co-working space provider, local business, commercial property owners and various survey respondents.</p>	<p>The GLA set out support for the council's approach to the protection of office floorspace across the borough; and industrial uses in the Vale Royal / Brewery Road LSIS. Other respondents suggested there should be more flexibility to permit a wider range of uses within the LSIS</p> <p>Local businesses expressed concern over the ongoing loss of employment premises, particularly those which have been converted to residential use. The impact that this is having on rental values was highlighted. One business talked of having to relocate outside of the Borough, resulting in the loss of local jobs.</p> <p>A workspace provider responded by setting out that upper floors of town centres should be used for office, to support business growth.</p> <p>Several respondents including commercial property owners and workspace providers supported the growth of existing businesses and encouraged policies on flexible / hybrid space. One landowner set out support for live/ work space.</p>	<p>The draft Local Plan seeks to protect office floorspace across the Borough, unless exceptional circumstances can be demonstrated; and prioritises provision of new space to meet projected demand.</p> <p>Industrial uses within LSIS will be protected due to their importance to the Islington and central London economy; this approach is supported by the council's updated evidence base.</p> <p>The draft Local Plan supports the development of business floorspace on upper floors of Town Centres. The draft plan strengthens the requirement for affordable workspace and also supports a mix of workspace typologies, including co-working space, is also supported</p> <p>Live/work units are not supported as they are generally used for residential purposes and do not generate significant employment.</p>

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		<p>Policies to increase provision of affordable workspace were supported.</p> <p>Another landowner suggested that commercial office densities should be increased to meet employment floorspace targets, specifically in Farringdon, and that restrictions with regards to local views should be removed to accommodate business growth.</p> <p>Another landowner requested consideration of alternative uses, namely residential, for the Bush Industrial Estate on Station Road.</p> <p>A local resident highlighted that the mixed use nature of the Bunhill and Clerkenwell area is under threat from residential development, and requested that business uses be retained here.</p> <p>Survey respondents highlighted rising business rates as a key issue, and called for the provision of more space suitable for occupation by SMEs. It was set out that contributions from developers towards affordable workspace should be sought and that the provision of flexible co-working space should be prioritised. To support local job opportunities, respondents expressed that there should be an LBI apprenticeship scheme and the use of planning conditions to secure local jobs.</p>	<p>Whilst the Council is seeking to maximise the delivery of business floorspace, this should not be at the expense of other policy priorities such as local views, which should be protected and enhanced.</p> <p>Designated employment areas serve an important function. The introduction of non-business uses – particularly residential uses - has the potential to harm such areas, which are important in terms of serving the local economy and providing local employment.</p> <p>The Bunhill and Clerkenwell AAP seeks to protect and promote the development of the business floorspace in the area.</p> <p>Business rates is matter outside of control planning. Draft Local Plan policies will continue to secure jobs and training opportunities from new development, in order to secure local jobs.</p>
Retail, Culture and Services	GLA, Camden and Islington Health, Historic England, community groups,	There was broad support for the approach set out in the Scope of Review document, in relation to retail, culture and services. The majority of respondents agreed that shops should be protected.	The draft Local Plan will continue to protect shops across the Borough.

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	<p>and various survey respondents.</p>	<p>The GLA set out that the Local Plan should encourage the intensification of uses within town centres, through higher density, housing-led mixed use development. Retail and evening economy uses were supported.</p> <p>Camden and Islington Health supported the ongoing protection of dispersed shops and raised concerns around changing nature of retail, and impact this has on the reduction of social interaction. Support for local shops was also set out by local residents. Other survey respondents set out that shops should meet the needs of local people. There was a preference for independent shops and cafes, rather than high street chains.</p> <p>Historic England highlighted that town centres often contain a wealth of heritage assets and that opportunities here should ensure the heritage interest is capitalised upon, as a contribution towards the vitality and viability of the town centre.</p> <p>One community group argued that the evening economy should be limited as it contributes to anti-social behaviour. Conversely, one local business thought policies should encourage the evening economy, provided it is well managed.</p> <p>One respondent called for the continued protection of Camden Passage – a shopping area specialising</p>	<p>The draft Local Plan identifies town centres as the focal point for commercial, cultural and civic activity. The night time economy is also supported in Town Centres</p> <p>The draft plan seeks to protect shops and cafés/restaurants located outside of designated Town Centres and Local Shopping Areas.</p> <p>The draft Local Plan recognises the heritage value of town centres.</p> <p>Proposals for new night time economy uses (which incorporates evening economy) are supported, subject to ensuring the proposed use complements existing uses and there would not be significant adverse impacts on amenity or function, particularly for residents.</p> <p>Camden Passage specialist shopping area will be strongly protected.</p> <p>Area Spatial Strategies (which cover all of Islington’s Town Centres) identify public realm / transport improvements for Town Centres. Active frontages are promoted.</p> <p>The Council’s Licensing Team and licensing policy is separate to the</p>

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		<p>in antiques – and restrictions on food and alcohol outlets here.</p> <p>Prioritising improvements to the public realm and pedestrian / cycle networks was a key theme in relation to how the Council can support town centres. Continued support for active frontages and smaller retail units was expressed.</p> <p>One respondent called for a stricter approach to managing the opening of new licensed premises, particularly in Clerkenwell.</p> <p>In response to a question around the changing the nature of retail, for example, the growth of the online shopping, the majority of respondents called for more delivery collection points in town centres, so as to limit the increased number of delivery vehicles on the road, and their impact on congestion and air quality. Some respondents advised that the town centres should be the focus for a mix of uses that do not operate online, such as bakeries, restaurants, pharmacies etc.</p> <p>Many respondents to the survey highlighted the need to protect pubs and live music venues, and supported the provision of such uses. One respondent expressed that there should be no more bars in Archway, whereas another wanted to see a more peaceful café culture with fewer drinking establishments.</p>	<p>Planning Department and planning policies. However, the council's licensing team should be consulted on any planning application which proposes a licensable activity.</p> <p>The Council acknowledges that the nature of retail is changing. To ensure that Town Centres continue to be viable the Council has taken a more flexible approach to land use here. For example, Primary Shopping Areas will be the focus for A1 uses, whereas the remainder of the Town Centre will be appropriate for a range of uses, including A1-A5, D2 and Sui Generis main Town Centre uses.</p> <p>The draft plan resists the redevelopment, demolition and change of use pubs. The Archway Area Spatial Strategy states that night-time economy uses will only be supported where adverse amenity impacts are prevented/mitigated, particularly in relation to uses which intend to serve alcohol.</p> <p>The draft Plan limits the location of hotels to specifically allocated sites, to protect land for more priority uses, particularly higher density employment uses such as offices.</p>

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		<p>One respondent advocated for new hotels in the CAZ.</p>	
<p>Social Infrastructure</p>	<p>GLA, Camden and Islington Health, community groups, and London Borough of Hackney and various survey respondents.</p>	<p>Respondents were generally supportive of the approach set out in the Scope of Review document.</p> <p>The GLA welcomed recognition of the need for evidence which substantiates the pressure on social infrastructure and supported the retention of Moorfields Eye Hospital in Central London. The response set out that if the site was to be redeveloped, it would be appropriate for mixed use redevelopment, including residential.</p> <p>The London Borough of Hackney responded by setting out support for the approach and highlighted that development close to the borough boundary should have regard to the potential impact on community facilities in Hackney.</p> <p>The majority of survey respondents set out that community facilities should be protected, and in some cases consolidated, to make better use of space. Some respondents suggested that new facilities should provide easy access for the disabled and the elderly, and should be designed to promote sustainable transport and active lifestyles / healthy living.</p>	<p>The site of Moorfields Eye Hospital is located within the Central Activities Zone (CAZ) and the City Fringe Opportunity Area. It is also located in close proximity to the cluster of new business developments in the wider Tech City area. The site represents a unique opportunity to provide a very significant amount of additional business floorspace which would enable the expansion of this internationally important concentration of tech businesses. The development of business uses here will also contribute towards meeting the Borough's requirement for an additional 400,000 sqm of business floorspace, up to 2036.</p> <p>The draft plan will, in some circumstances, require major developments to provide new social infrastructure, in order to mitigate impacts on local services (which are not limited to borough boundaries).</p> <p>The draft plan supports proposals to provide new and/or extended facilities. It seeks to resist the loss of such facilities unless it can be demonstrated it is not required, or is part of a rationalisation</p>

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Design	Community groups, Historic England, Camden and Islington Health, Sport England, London Borough of Hackney and commercial property owner, workspace provider, Environment agency, and various survey respondents.	<p>One community group set out that new housing provision should not happen indefinitely and without enormous care</p> <p>There was a mixed response on the topic of tall buildings. Some respondents were supportive of tall buildings, provided they were designed well, whereas others were opposed due to their potential impact on the character of the Borough. Other respondents set out they would be supportive, provided that they provided affordable housing, cycle storage and necessary local services. One community group considered that tall and mid-rise buildings would be inappropriate, whereas a workspace provider supported taller buildings due to the role they could play in meeting the Borough’s need for housing and employment space.</p> <p>Historic England supported the contextual approach to delivering good design and a plan-led approach that enables the delivery of high density, without compromising or harming the significance of heritage assets, including through exploring the concept of mid-rise development. It was set out that the Local Plan provides an opportunity to get a better understanding of when tall buildings are necessary, potentially through a sequential approach that looks at alternative forms of building typologies.</p>	<p>programme. All developments are required to promote active means of travel and are to be designed inclusively.</p> <p>The Council agrees that proposals for new development must be carefully considered.</p> <p>The draft Local Plan identifies specific sites where tall buildings may be appropriate in principle. These locations were identified in a detailed Tall Buildings Study, commissioned by the Council. The draft plan requires all tall building proposals in these locations to meet detailed criteria set out in the draft building heights policy.</p> <p>The draft plan requires developments to be designed contextually. The draft policy recognises that although tall buildings can help make the best use of land, by optimising the amount of development on a site, they can also have significant adverse impacts. As such, tall buildings will be restricted to certain locations and will be managed carefully through appropriate design. Mid-rise development highlights that most development is expected to be accommodated in mid-rise development of 8-10 storeys.</p>

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		<p>Camden and Islington Public Health set out that design should not only consider the design of buildings and use of materials but should also be about how development links to the whole environment and addresses complex issues such as pollution and lack of open space.</p> <p>Sport England recommended that the principles of Active Design are specifically incorporated into the Local Plan.</p> <p>One commercial property owner set out that local views are restrictive and that the Council should identify locations where additional development, at higher densities, could be located.</p> <p>The London Borough of Hackney welcomed joint working on potential cross-boundary implications with regard to tall buildings.</p> <p>One community group raised concern about the impact of new policies on existing conservation areas and how new development may impact the character conservation areas.</p> <p>An approach to basements in line with existing SPD was supported. It was requested that the Local Plan cross-references the Basements SPD. The principles of the SPD were supported and it was set out that in general, basement development should be restricted, particularly in conservation areas.</p>	<p>The draft Local Plan considers development on the whole, not just in relation to specific buildings; developments to be contextual, connected, sustainable, and inclusive.</p> <p>The Draft Local Plan promotes healthy lifestyles through good urban design and promoting active travel.</p> <p>Local views maintain important views of St. Paul's Cathedral and other significant local landmarks. These views are important and will be maintained in the draft Local Plan and development should take all reasonable steps to enhance such views.</p> <p>The Council will continue to work the London Borough of Hackney on cross-boundary matters.</p> <p>Throughout the draft Local Plan, the importance of conservation areas is highlighted. Area Spatial Strategies and specific policies require development proposals to preserve and enhance conservation areas.</p> <p>The draft Local Plan includes a specific policy on basement development and sets out that it will only be permitted in certain</p>

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		<p>The potential health impacts in relation to tall buildings were raised by Camden and Islington Public Health. The use of sustainable energy sources and materials was highlighted as being important.</p> <p>The Environment Agency set out that design policies should consider requirements for reducing surface water flood risk, adapting to climate change, using water resources efficiently and improving water quality.</p> <p>Survey respondents raised the importance of high quality design and inclusive design. A number of respondents raised the issue of the importance of amenity space within residential developments. It was set out that developers should make improvements to the public realm and provide open space as part of their proposals.</p>	<p>circumstances, where it can be demonstrated that no harm will be caused. The existing SPD is referred to for further guidance.</p> <p>All major developments are required to consider whether any health impacts may arise from the development. A full Health Impact Assessment may then be required in line with draft Policy SC3. The plan sets out a number of sustainable design policies that would apply to applications for tall buildings.</p> <p>The draft Local Plan includes policies which seek to reduce the risk of surface water flooding, minimise the contribution of development in Islington to climate change and adapt an integrated approach to water management.</p> <p>The importance of inclusive design is embedded throughout the draft Local Plan. This is also supplemented by the Inclusive Design SPD. Draft Policy H5 – private outdoor space – requires that all new residential development and conversions will be required to provide private outdoor space. All developments will continue to be required to consider improvements to the public realm.</p>

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Transport	GLA, TfL, Camden and Islington Public Health, community groups, and various survey respondents.	<p>The GLA and TfL set out support for the Council’s decision to proactively discourage car use and encouraging car-free development. The majority of survey respondents set out support for the continued inclusion of policies which promote walking and cycling, and for car-free development.</p> <p>It was recommended that the Local Plan should have regard to the Mayor’s Transport Strategy. Various measures to promote sustainable transport choices were referenced.</p> <p>Camden and Islington Public Health advised that the Council should work closely with TfL to realise opportunities to encourage walking; identify walking and cycling routes; link local cycle routes with London-wide cycle routes.</p> <p>There was also support for car-free development from a community group. They also expressed that improvements for cyclists should not be prioritised, particularly with regard to the improvements to Highbury Corner.</p> <p>Another community group set out strong support for policies which encourage both walking and cycling above other modes of transport. It was recommended that policies should set out that developments should be permeable and create walking routes. It was also set out that car parks should be allocated for housing.</p>	<p>The Mayor’s Transport Strategy has been considered in the development of transport policies. The Council is committed to working in partnership with TfL to deliver the aspirations on healthy streets/liveable neighbourhoods; and borough-level improvements to public transport, the public realm and cycling infrastructure.</p> <p>The Council recognises that motorised road transport generates congestion, pollution, noise and can compromise road safety for other uses, as such the Council is maintaining its current approach to car-free development.</p> <p>All development proposals are required to promote journeys by physically active means, including walking and cycling. The redevelopment of existing car parks for different uses is strongly encouraged.</p> <p>The Council notes support from the London Borough of Hackney.</p> <p>As above, the Council promotes sustainable transport and recognises the links with air quality. The draft Local Plan also includes a specific policy on air quality.</p>

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		<p>The London Borough of Hackney set out support for the approach to sustainable transport, including emphasis on car-free development.</p> <p>The Environment Agency set out that given the main source of air pollution is frequently transport, it is expected that relevant Local Plan policies reference and link with the Council's Borough Air Quality Action Plan and the Mayor's Air Quality and Transport Strategies.</p>	
Sustainability	GLA, Environment Agency, Thames Water, Historic England, Camden and Islington Public Health, community groups and various survey respondents.	<p>The GLA set out support for the Council's continued focus on zero carbon. Addressing the urban heat island effect and increasing the amount of green space are two policy areas that are relevant to Islington, the Council's focus on these is supported. Several survey respondents also set out support for this.</p> <p>The Environment Agency set out that the key environmental issues for Islington relate to air quality, water quality, and water resources, 'local' flood risk, including surface water flooding, and green infrastructure. It was recommended that the Local Plan has strong flood risk policy and a flood risk or 'water management' policy which requires developments to aim to achieve a reduction of surface water runoff to greenfield runoff rates and maximise the use of Sustainable Drainage Systems (SUDS). It was recommended that the Council brings forward, reviews and strengthens the water efficiency target for non-residential developments.</p>	<p>The Council notes support from the GLA. The draft Local Plan promotes zero carbon development, with the aim that all buildings in Islington will be zero carbon by 2050.</p> <p>The draft Local Plan sets out a strategic approach to green infrastructure</p> <p>The draft Local Plan positively addresses the key environmental issues highlighted in the response. There are specific policies on air quality, flood risk management, integrated water management and sustainable drainage. Draft Policy S9 requires that all developments must demonstrate that appropriate Sustainable Urban Drainage Systems (SUDS) have been implemented in accordance with the drainage hierarchy to ensure that surface</p>

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		<p>There was recognition that existing Local Plan sustainability standards are quite strong, with regards to adapting to climate change, maximising use of existing building material and re-using on site, reducing waste.</p> <p>Thames Water requested the inclusion of a new policy that sets out that permission will only be granted for developments which increase the demand for off-site service infrastructure where sufficient capacity already exists, or extra capacity can be provided in time. Thames Water set out recognition of the environmental and economic benefits of Sustainable Drainage Systems (SUDS) but set out that SUDS are not appropriate for use in all areas. The inclusion of a paragraph on surface water drainage was requested. In relation to water conservation, Thames Water set out support for the mains water consumption target of 110 litres per head, per day, as set out in Planning Practice Guidance.</p> <p>Historic England set out that policies on sustainability issues should take a balanced approach so they do not conflict with the objectives on conserving and enhancing the historic environment.</p> <p>Camden and Islington Public Health set out the importance of sustainable growth and highlighted the need to consider renewable energy technologies</p>	<p>water runoff rates and volumes entering open space are predictable and water at the surface is clean and safe.</p> <p>The draft Local Plan includes a policy on water infrastructure to ensure that sufficient capacity exists to cater for proposed development. The water consumption target is included in policy for residential development. SUDS is promoted in line with criteria and best practice.</p> <p>The draft Local Plan includes various policies relating to sustainability and conservation. The Council will ensure a balanced approach is taken when applying such policies, as detailed in policy DH1.</p> <p>Draft Policy S1 – delivering sustainable design – states that all development proposals must follow the energy hierarchy, which requires maximising energy efficiency measures firstly, but could also include generating, storing and using renewable energy on-site where justified.</p> <p>The draft Local Plan includes a specific policy on air quality which requires that new developments must not cause new</p>

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		<p>and decentralised energy to make the transition to low carbon buildings. Several survey respondents also set out support for the Council’s approach on encouraging renewable energy.</p> <p>One community group raised concerns about pollution and air quality. Whereas another community group set out that the Council should undertake another round of tree planting to reduce pollution and maximise air quality.</p>	<p>exceedances of legal air quality standards. Urban greening is encouraged.</p>
Heath and Open Space		<p>The GLA welcomed the Council’s attention to addressing health and health inequalities, and advised that research undertaken by the GLA into the concept of the ‘Greenspace Factor’ may be useful in formulating policies.</p> <p>The Environment Agency set out that given the Borough has a low proportion of open space and green space, it is important that new developments are required to maximise green space and green infrastructure on site or make suitable provision elsewhere. Protecting and enhancing biodiversity should be considered throughout the Local Plan even where there are few designated sites of habitat or conservation value. It was set out that a green buffer zone along the Regents Canal needs to be a policy requirement and will provide a valuable green network for wildlife, contributing to Water Framework Directive objectives.</p>	<p>The Council notes support from the GLA. The urban greening factor is referenced in the strategic green infrastructure policy.</p> <p>New developments are required to maximise green space and green infrastructure. Biodiversity will continue to be protected and enhanced throughout the Borough. The draft Local Plan recognises the importance of connectivity between habitats and highlights the Regent’s Canal as an important wildlife corridor. The canal is a designated Site of Importance of Nature Conservation and planning permission will not be granted here for any schemes that adversely affect biodiversity.</p> <p>Draft Policy DH1 identifies the importance of all heritage assets, including historic parks and gardens, and London Squares.</p>

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
		<p>Historic England requested that the heritage interest of open space is recognised and embedded in policy.</p> <p>Camden and Islington Public Health set out that open space, and green walls and roofs, should be promoted. In response to question about how green infrastructure in the Borough can be maximised, numerous survey respondents highlighted green roofs, green walls and tree planting.</p> <p>Sport England raised concerns about the evidence base and advised that policies relating to indoor and outdoor sports provision, such as leisure centres and playing fields, should be based on Sport England’s policy of protect, enhance and provide, and should be informed by up-to-date and robust Playing Pitch and Built Facility Strategies.</p> <p>The London Borough of Hackney set out support and advised that they will be taking a similar approach to health and protection of open space.</p> <p>Survey respondents set out that in order to promote good health through the built environment, active travel, social integration, improved access to greenspace and reducing traffic congestion should be promoted.</p>	<p>Green roofs and green walls are supported within the draft Local Plan.</p> <p>The council is undertaking a sports facilities study to inform the draft Local Plan. The scope of the study has been discussed with Sport England.</p> <p>The Council notes support from the London Borough of Hackney.</p> <p>Active travel and improving quality and access to green space is promoted throughout the draft Plan.</p>
Finsbury Local Plan (now referred to Bunhill)		The GLA supported the proposal to keep the Finsbury Local Plan (now Bunhill and Clerkenwell AAP) as a separate document, provided there is appropriate cross-referencing. It was advised that	The Council notes support for the Bunhill and Clerkenwell area having its own plan. The area around Farringdon is subject to its own Area Spatial Strategy which sets

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
and Clerkenwell AAP)		<p>particular attention should be paid to the area around Farringdon, due to the expectation that it will be subject to further development pressure and capacity given Crossrail. It was recommended that the Council works in close cooperation with Camden and the City to maximise potential in the area.</p> <p>Community groups also recognised that the south of the Borough is an important part of the Borough and agreed that the area warrants its own plan. There was consensus from survey respondents on this.</p> <p>One resident raised concern about the loss of business space and the encroachment of residential space in the area.</p> <p>Historic England supported the development of detailed policy for this area and recommended that the Council ensures that evidence and details of the policies produced regarding the historic environment are proportionate.</p> <p>The City of London highlighted that they are developing a cultural hub in the north of the City, adjacent to the Bunhill and Clerkenwell area, and welcomed joint working to address any relevant issues.</p> <p>One commercial property owner agreed that the area should have its own plan and that the focus for the area should be commercial growth. It was set out that the policy currently places too much</p>	<p>out the key strategic considerations for the area, including Crossrail. The Council will continue to work with the City of London in developing policies for this area.</p> <p>The Council notes support from community groups and survey respondents on this.</p> <p>The Bunhill and Clerkenwell AAP prioritises the delivery of office floorspace in the area. The Council recognises that the area has a large and successful economy and has the potential to accommodate significant business growth.</p> <p>The Council recognises the historical importance of the Bunhill and Clerkenwell area. The requirement to conserve and enhance the area's history and heritage is embedded within the draft AAP.</p> <p>The draft AAP identifies a Cultural Quarter in Clerkenwell / Farringdon and will continue to work with the City of London on such cross-boundary matters.</p> <p>Whilst encouraging business growth in this area is a key priority, the Council considers that this should not be at the</p>

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
		<p>emphasis on local views, heritage and conservation, and that these policies are too restrictive.</p> <p>The Environment Agency set out that if that the AAP area is a part of a Critical Drainage Area, there should be consideration of policy requirements and recommendations to alleviate and reduce the risk of local surface water flooding, sewerage flooding or ground water flooding.</p>	<p>expense of local views. Protection of local views is maintained in the draft Local Plan.</p> <p>The draft AAP highlights that two of the Borough's three Critical Drainage Areas are located within the AAP area. Policies set out in the draft Local Plan apply.</p>
Site Allocations (general comments)	Historic England, Queen Mary University, commercial property owner, TfL.	<p>Historic England set out that site allocations should carefully consider and identify any potential heritage issues.</p> <p>A commercial property owner requested that the existing allocation for 50 Farringdon Road be amended to include retail and other active frontages at ground floor and basement, and office and hotel uses above.</p> <p>Further requests to amend existing allocations include Angel Gate, where it was requested that the site be allocated for an intensification of business uses alongside the provision of residential uses.</p> <p>TfL suggested that Crossrail 2 is referenced in relation to any relevant sites in Angel.</p>	<p>Site Allocations now references specific site designations and constraints, including potential heritage issues.</p> <p>Allocated sites in the CAZ which are in existing business use are considered to be appropriate for the intensification of business uses. The Council has taken a restrictive approach to new hotel development and the draft Local Plan sets out that hotel development will only be permitted on allocated sites, or sites with existing visitor accommodation uses – the draft plan no longer proposes a hotel at 50 Farringdon Road.</p> <p>The Council considers that the priority for Angel Gate is to provide office floorspace and some commercial uses with active frontages at ground, due its location within the CAZ.</p>

Table 2.1: Summary of responses to Scope of the Review consultation (November 2016) by topic/policy area

Topic	Respondents	Summary of Response	Response in Draft Local Plan
Site Allocations ('Call for Sites')	Various landowners	A number of potential site allocations were put forward for inclusion as new allocations, with a number of responses relating to existing allocations.	<p>Crossrail 2 is highlighted on relevant allocations in Angel.</p> <p>The majority of the sites (nearly two thirds) subject to specific responses have been taken forward as allocations in the draft Local Plan.</p> <p>Some sites were not taken forward as allocations, as they were unsuitable for development or were not considered to warrant a specific allocation.</p>

3 Site Allocations: Direction of Travel (February 2018)

- 3.1 This section sets out the details of the Regulation 18 consultation on the Site Allocations: Direction of Travel document. It provides details of when the consultation took place, who was consulted, and the consultation methods undertaken. The main issues that were raised during the consultation are summarised by strategic locations in the borough in Table 3.2. Information on how the draft Local Plan responds to these issues is also set out in this table.
- 3.2 The Regulation 18 consultation on the Direction of Travel document ran for a period of 6 weeks between Monday 12 February and Monday 26 March 2018.
- 3.3 The consultation included the following:
- Notifications in local media (Islington Gazette and Islington Tribune).
 - Site notices at allocated sites – for larger sites, more than one notice was erected.
 - Notification on the council’s consultation website and on the ‘Local Plan review’ webpage of the council’s website.
 - Over 21,000 letters and emails sent out to:
 - those registered on the policy consultation database including statutory consultation bodies;
 - landowners (including people with a leasehold interest in sites); and
 - Residents/businesses who are in close proximity to the proposed sites (considered to be within 30 metres).
 - Copies of the Direction of Travel document in libraries.
- 3.4 In total, 375 individuals/organisations responded to the consultation. A total of 527 responses were received from these respondents (as some respondents commented on multiple sites); 500 responses were related to specific sites, whereas 27 responses were related to general matters, including suggestions for new sites, queries on previously deallocated sites, or requests to kept informed of the progress of the plan (NB: the council will ensure that all respondents who have requested to be informed of future progress are notified).
- 3.5 The 500 responses which were related to sites have been broken down by strategic location. Table 3.1 shows the number of sites consulted on and the number of responses received within each location.

Table 3.1 - Responses to Direction of Travel Consultation by Key Area

Strategic location	Number of sites consulted on	Responses received
Angel & Upper Street	17	64
Archway	10	39
Bunhill & Clerkenwell	57	142
Finsbury Park	16	45

Highbury Corner & Holloway Road	9	37
King's Cross and Pentonville Road	4	36
Nag's Head and Holloway Road	12	25
Vale Royal & Brewery Rd	9	64
Other Important Sites	18	48
Total	152	500

3.6 The Bunhill & Clerkenwell area, which is largest strategic location and has the most allocations, received the greatest number of responses. The Vale Royal & Brewery area included just nine sites in this iteration of the plan but received a total of 64 responses, the majority of these in relation to one proposed allocation. King's Cross & Pentonville Road and Highbury Corner & Holloway Road also received a significant number of responses relative to the number of sites consulted on, due to a significant number of responses on particular individual sites in these areas.

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
Archway	Historic England, Sport England, TfL Commercial Development, community groups, commercial property owners and individuals.	<p>There were 38 responses to the 10 allocated sites in Archway. Two sites; DOT5 Archway Campus and DOT4 Whittington Hospital ancillary buildings, received the most responses, with 10 and 8 respectively. In relation to DOT5 Archway Campus, a number of responses were related to a detailed proposal which has been produced by a developer. Some respondents set out support for allocation but objected to the developer's proposal.</p> <p>One response to DOT4 Whittington Hospital Ancillary Buildings was concerned that the proposal would result in the loss of staff accommodation, whilst another requested that staff accommodation be run by charities as alms houses.</p> <p>Site DOT3 Archway Methodist Hall received 5 responses. One response was not directly related to development principles, rather to proposals drawn up by a developer – this response expressed concern about the height and potential impact on light and views, as well as traffic and car parking. Another respondent supported the allocation, but set out that options for future use should be community use only. Sport England set out an objection to the loss of sites/buildings that fall within the D2 Use Class.</p> <p>Four responses were received in relation to DOT9 724 Holloway Road. Three of the responses were objections based on detailed design, in relation to building height,</p>	<p>The purpose of the site allocations is to allocate sites for a particular use or development and to identify site specific constraints and designations. It is generally not appropriate to outline detailed design issues such as density, bulk and massing, as this will be determined at planning application stage based on relevant Local Plan policies.</p> <p>The allocation for Whittington Hospital includes an element of residential development. It is not possible for the plan to set out the management arrangements of any future housing.</p> <p>The allocation for Archway Methodist Hall requires refurbishment / redevelopment for the provision of a cultural hub, which includes community uses. The Council notes Sport England's objection. It appears that SE have mistakenly identified the site as a sports facility by virtue of its D2 use; however, this site was not formerly used for sporting activities, therefore there is no basis to require sporting uses as part of the allocation</p> <p>The objections set out for 724 Holloway Road are related to detailed design. They</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>loss of daylight and sunlight, overlooking / loss of privacy, light pollution, noise, and lack of parking.</p> <p>Three responses were received in relation to DOT2 4-10 Junction Road. Support was set out for town centre uses on the basis that this will improve the town centre. One response requested that the options for future use be expanded to include residential use.</p>	<p>do not set out why the site is not unsuitable for development in principle and therefore are not considered valid reasons for removing the site.</p> <p>Support noted for 4-10 Junction Road. The site is deemed suitable for the provision of business and retail use given the commercial function of the location; residential use is not a priority for this site.</p>
Finsbury Park	Sport England, Historic England, commercial property owners and individuals.	<p>There were 45 responses to the 16 allocated sites in the Finsbury Park area. Site DOT24 Andover Estate received the most responses (18). A number of these responses were supportive of the allocation, due to the potential for the delivery of additional housing. Some responses set out suggestions which were related to detailed design, in terms of crime reduction / security, inclusive design, amenity space and quality of internal fixtures. Objections related to loss of light and privacy, however, these were related to a specific block in the estate, rather than in response to the whole allocation. There was some concern over the loss of allotment space and children’s playground.</p> <p>Site DOT23 Tesco, 105-119 Stroud Green Road received eight responses. Concern was raised about the potential amenity impacts on neighbouring residential properties, particularly in relation to loss of light and privacy. There was also some support for the</p>	<p>Support for the Andover Estate allocation noted. The site has planning permission and this is reflected in the allocation.</p> <p>In relation to the Tesco site, the purpose of the Site Allocations is to identify potential uses. Detailed design issues, such as potential amenity impacts and density are addressed during the planning application process. The Council notes supportive responses for the allocation for Tesco, 105-119 Stroud Green Road. The site address has been corrected as requested. The site boundary reflects Tesco freehold as per Land Registry information.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>allocation. Representatives of Tesco set out that higher density development should be encouraged and that building height should be increased. Several respondents asked that the address and boundary be amended to include sites in Tesco's ownership only.</p> <p>One response to DOT16 CYMA Service Station, 201A Seven Sisters Road requested that options for future use were broadened to include a range of uses, whereas another set out broad support for development of the site.</p> <p>Historic England request that DOT22 179 Hornsey Road, should set out the building is of heritage value and should be retained.</p> <p>Sport England objected to sites DOT12, DOT21 and DOT24 as the loss of D2 uses would be contrary to Sport England's Planning Policy and the NPPF, unless the facilities are, at the very least, replaced.</p> <p>Respondent suggested that DOT14 - 129-131 & 133 Fonthill Road & 13 Goodwin Street should maximise residential development as part of a mix of uses.</p> <p>There was a request to not allocate site DOT25 - 216-220 Seven Sisters Road as there are plans for the site which will be done as soon as possible.</p> <p>A respondent considered that DOT26 - Conservative Club, 1 Prah Road should be allocated for solely residential development</p>	<p>The allocation for the CYMA Service Station has been amended to prioritise business use, reflecting wider priorities of the Local Plan. General support for development of the site is noted. Nearby listed buildings have been highlighted.</p> <p>The allocation for 179 Hornsey Road sets out that development proposals should respect and retain the character and interest of the building.</p> <p>The Council notes Sport England's objection. DOT24 has planning permission, which the allocation reflects.</p> <p>DOT12 has an existing D2 yoga studio use. DOT21 is unclear about existing D2, as this refers to description of previous application; even if the site has lawful D2 permission at present, there is clearly no sports facilities currently on site. It appears that SE have mistakenly identified these site as a sports facility by virtue of D2 use; however, the sites are not formerly used for sporting activities, therefore there is no basis to require sporting uses as part of the allocation.</p> <p>DOT14 is located in a specialist commercial area. The allocation for retail-</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
			<p>led mixed use with complimentary office/workshop uses on upper floors will best align with the council's priorities for this area.</p> <p>In relation to DOT25, imminent plans for the site are not justification to not allocate.</p> <p>1 Prah Road (formerly ref DOT26) is located in the heart of the Town Centre and is considered most appropriate for commercial uses.</p>
Nag's Head and Holloway Road	Historic England, commercial property owners and individuals.	<p>There were 25 responses relating to 8 of the 12 sites located in the Nag's Head area.</p> <p>One response to Site DOT33 Holloway Prison set out that there should be 50% affordable housing as part of any redevelopment. Another set out support for the allocation, welcoming new open space.</p> <p>Site DOT27 Morrison's Supermarket received four responses. The landowner expressed that the allocation should set out that housing should be optimised and that improvements to the public realm should be referenced; specific "more ambitious" wording was suggested. Nag's Head covered market representative supported the retention of the market with retail and office above. A representative of KFC was opposed the allocation on the grounds that the existing building is relatively</p>	<p>Any subsequent development proposal is required to be in line with the detailed policies as set out in the Local Plan, including in relation to affordable housing. Support for the Holloway Prison allocation is noted. Conservation Areas and heritage assets are now referenced.</p> <p>The Morrison's Supermarket allocation states that residential use may be acceptable on upper floors. Opportunities for improving the public realm and retaining the market are highlighted. It is considered that the site is currently underdeveloped and presents a significant opportunity for the delivery of new and improved floorspace, as well as much needed public realm</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>modern and well-used. One respondent supported particular types of retail on the site.</p> <p>Respondent to site DOT20 Territorial Army Centre, 65-69 Parkhurst Road set out that the future use of the site should include a mix of council and key worker housing, with cadet use. Similarly, another response set out that they would like to see a community use on site, such as a gym, nursery, or library.</p> <p>Responses were also received in relation to site DOT29 443-453 Holloway Road. These set out support for retaining the building, highlighting the potential heritage significance of other buildings on site, and support for the proposed mix of uses.</p> <p>Responses to site DOT38 Mamma Roma set out that amenity impacts in relation to privacy and overlooking should be considered. One respondent raised potential issue with site boundary.</p> <p>Response to site DOT31 - 392A and 394 Camden Road asks for changes to ownership information and address, and reference to extant permissions.</p> <p>A response to site DOT34 - 457-463 Holloway Road – supported redevelopment for residential with specific design details requested. Another response suggested employment, leisure and residential uses with a gym at ground floor.</p>	<p>improvements. The proposed allocation is considered to sufficiently reflect the significant development opportunity that the site presents.</p> <p>The KFC site is included to allow for more comprehensive development and maximising opportunities for permeability through the site. It's continued inclusion in the boundary is considered appropriate.</p> <p>The allocation supports enhancement of the covered market.</p> <p>With regard to specific types of retail, it is not possible to require this through an allocation.</p> <p>The Territorial Army site is allocated for residential and cadet use. It is not possible for the allocation to prescribe the type of housing that should be delivered. The surrounding Conservation Areas and heritage assets are highlighted.</p> <p>The Council notes support for the allocation for 443-445 Holloway Road.</p> <p>Regarding the Mamma Roma site, Land Registry information suggests the</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
			<p>boundary is correct. Local Plan policy will ensure amenity of adjacent residents is protected.</p> <p>Changes to DOT31 made following response.</p> <p>Regarding DOT34, allocation promotes employment and residential uses which would allow for a mix of relevant uses. Specific requested design detail is not appropriate for an allocation but it does support sympathetic development of locally listed building to address current issues.</p>
Highbury Corner and Holloway Road	Community groups, local businesses, Historic England, commercial property owners, High Speed 1, London Metropolitan University.	<p>There were 37 responses to the nine allocated sites in the Highbury Corner & Holloway Road area. The majority of responses (19) were in relation to DOT46 Highbury and Islington Station. A significant number of these responses were objections and / or concerns related to: the potential for ongoing disruption for local residents from construction; noise pollution; impact on the road network; loss of light and privacy from potential development over railway tracks; increased population causing further congestion and road safety issues, impact on character of surrounding Conservation Areas and listed buildings, and impact on wildlife habitats.</p> <p>Some respondents were neither supportive or opposed to the allocation but highlighted issues that should be considered, such as conservation and the historic</p>	<p>As previously stated, it is not the intention of the Site Allocations to address detailed design issues, but rather to set out potential uses / type of development. Considerations relating to sensitive design, with regard to overlooking, overshadowing and train noise, and HS1 tunnels have been included. Relevant allocations identify heritage assets and conservation areas; the Highbury and Islington Station allocation all development must comply with policies set out in the Local Plan, including in relation to conserving and enhancing heritage assets and impacting Conservation Areas.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>environment, amendments to the boundary of the allocation, and the development of the wider area. High Speed 1 highlighted that the HS1 tunnels underneath the site may act as a constraint to future development. Historic England requested that the allocation includes wording setting out that development should: conserve and enhance nearby listed buildings; and consider the impact on the nearby Conservation Areas.</p> <p>DOT39 12, 16-18 and 24 Highbury Corner includes the Garage night club, restaurants and a former station entrance. There were seven responses to this site. Two of respondents considered that the existing building is of historic significance, whilst Historic England set out the site is a sensitive site due to the Conservation Area designation and surrounding listed buildings. Other responses raised concern about potential for the existing night club to be lost; and called for the site to be considered in conjunction with surrounding sites; and argued that the focus for the site should be on the re-opening of the station entrance.</p> <p>A response to DOT44 - 45 Hornsey Road notes the site is suitable for high density development and considers that the arches should be identified for A uses. Does not agree that existing use is B8. Puts forward two site in area as potential allocations.</p> <p>London Metropolitan University responded on two sites; DOT41 166-220 Holloway Road and DOT42 236-250 Holloway Road, the responses requested that the</p>	<p>The allocation for the Garage night club highlights the Conservation Area and adjacent listed building under site designations and constraints. The allocation seeks to protect the existing night club. The potential for a new ticket hall has been highlighted as a possibility</p> <p>The council considers that the railway arches are eminently suitable for B1c use. No evidence has been provided to demonstrate the site is not B8. The two sites put forward are both SINCS and therefore unsuitable in principle.</p> <p>The Local Plan restricts student accommodation in order to ensure delivery of uses which are greater priority. The proposed amended wording put forward by London metropolitan University is not considered acceptable as it would undermine the objectives of the Local Plan.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>allocations be amended to allow for student accommodation and uses that do not conflict with education uses.</p>	
<p>Angel and Upper Street</p>	<p>Historic England, Canal and River Trust, Crossrail 2, commercial property owners, TfL Spatial Planning, community groups, National Grid and individuals.</p>	<p>There were 65 responses to the 17 allocated sites in the Angel and Upper Street area. All sites received at least one response and there was a fairly equal distribution of responses across all sites.</p> <p>In relation to DOT53 Sainsbury's, 31-41 Liverpool Road, the majority of responses set out suggestions on what should be included in the allocation including detailed design suggestions.</p> <p>One response retaining the route from Cloudesley Road to White Conduit Street and locating car parking underground to make way for landscaping.</p> <p>One response noted the suitability of retail, business and residential uses on the site and expressed concern at an allocation which favours one use over others, then subsequently set out preferred wording which favours residential use over other uses.</p> <p>The Canal and River Trust set out that allocation DOT53 should continue to include a reference setting out that any development of the site would need to consider the impact of foundations on the zone of influence around the Islington Tunnel.</p>	<p>The Sainsbury's site is considered appropriate for retail and business floorspace, due to its town centre location, and the increasing need for additional business space. The comment and recommended consideration from the Canal and River Trust has been incorporated. The allocation highlights the importance of permeability through the site. It is generally not appropriate to outline detailed design issues as this will be determined at planning application stage based on relevant Local Plan policies</p> <p>Support for the allocation for Angel Square is noted. The allocation now sets out the potential to improve the existing building façade. The site is considered suitable for the intensification of business use, rather than residential use, due to its existing business use and location in the CAZ.</p> <p>The Council notes support for the retention of the theatre use on the Collins Theatre site. Regarding the objection, the</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>In relation to site DOT63 Angel Square, response set out support for the allocation and highlighted potential for improvement to the current building façade and significant intensification of business use. Another response called for the options for future use to be expanded to include residential.</p> <p>There was support for site DOT58 Collins Theatre, with one objection from a resident. One response noted a minor error with boundary, which includes adjacent residential properties.</p> <p>DOT54 1-7 Torrens Street, received a mix of responses were received. These included responses from Historic England, stating the building is of heritage value and encouraging its retention; TfL Commercial Development, stating that options for future use should include residential, and from a developer stating that a variety of town centre uses should be highlighted, including retail, business, hotel and residential.</p> <p>The latter response also considered that the existing use is not a community use and that the retention of the existing buildings is unlikely; considering the site without the limitations of refurbishment will provide the maximum flexibility in terms of delivering a comprehensive scheme.</p> <p>National Grid noted that sites DOT56 - 10-14 White Lion Street, DOT57 - 1-9 White Lion Street and DOT60</p>	<p>site already has permission for a theatre, which the allocation seeks to implement. The boundary has been changed based on the comment received.</p> <p>In relation to the allocation for 1-7 Torrens Street, it is considered that the site is suitable for retail, offices, cultural and community uses. Proposed uses correspond with the sites existing use and location within Angel Town Centre and the CAZ. The allocation does not claim that the existing use is a community use, but it is considered that the arts use has important benefits for the local community and Islington’s cultural offer. Retention and refurbishment of the existing building is considered to be a priority.</p> <p>Reference to National Grid infrastructure has been included in relevant allocations.</p> <p>Site DOT59 is currently in business use and is considered to be an appropriate commercial-led site.</p> <p>The response to DOT64 offers no reasons why the site is unsuitable in principle for supported housing.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>- N1 Centre, Parkfield Street are in close proximity to National Grid infrastructure. National Grid prefers that buildings are not built directly above underground cables and wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.</p> <p>A response to site DOT59 - Public Carriage Office, 15 Penton Street supported intensification of employment use and limiting residential use. TfL Commercial Development considered that the allocation should allow a more substantial element of residential.</p> <p>One respondent opposes the inclusion of site DOT64 - Windsor Street Car Park.</p> <p>A response to DOT49 - Pride Court, 80-82 White Lion Street suggested that the site is suitable for a range of town centre uses and residential use.</p> <p>A response to DOT50 - Electricity substation, 84-89 White Lion St considered that suitable uses for the site include retail at ground floor level, with either residential, hotel, or student accommodation above.</p> <p>A response to DOT55 - 161-169 Essex Road suggested retaining the integrity of the existing building and improving the façade. A response from the landowner is far too restrictive in terms of the future use and should allow for D1 and D2 use with residential development in</p>	<p>Moreover, the site has planning permission.</p> <p>Sites DOT49 and DOT50 are considered eminently suitable for intensification of business floorspace, given the context of the area.</p> <p>DOT55 is considered suitable for D2 use with supporting A1/A3, due to the site history and the location in the town centre. D1 use is not a priority for this site.</p> <p>Reference to Crossrail 2 safeguarding has been included where appropriate, as well as a recommendation to engage with the Canal and River Trust.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>the car park to provide funding for a restoration of high quality.</p> <p>A number of the sites included responses from TfL Spatial Planning, requesting that Crossrail 2 safeguarding be highlighted, or from the Canal River Trust noting future consultation requirements and recommending early engagement.</p>	
<p>Vale Royal/Brewery Road Locally Significant Industrial Site</p>	<p>Local businesses, commercial property owners and individuals.</p>	<p>There were 64 responses to the nine sites allocated in the Vale Royal / Brewery Road area. A significant number of these responses (57) were in relation to DOT67 Tileyard Studios. A significant proportion of these responses were from businesses who are located at Tileyard Studios. The majority were objections to the allocation on the grounds that the allocation will negatively impact the growth of existing business community. The majority of responses were not directly related to development principles, but were setting out support for Tileyard Studios as an organisation, or detailing personal success stories from being located in the area.</p> <p>DOT65 Fayers Site received two responses which highlighted the existing poor frontage on York Way and opportunities for improved streetscape; and also considered that the site allocation should encourage the intensification of B1 use.</p> <p>DOT69 4 Brandon Road also received two responses, again citing opportunities for improved streetscape and environmental improvements, and secondly calling for</p>	<p>It is not considered that the proposed allocation will negatively impact the growth of the existing business community. The site is located in an industrial area. Industrial uses within this area will be promoted and existing uses protected due to their importance to the Islington and central London economy; this approach is supported by the council's updated evidence base. B1c uses offer significant scope for further expansion of Tileyard Studios</p> <p>In relation to 4 Brandon Road and the Fayers site, the intensification of B1 uses, or the introduction of non-industrial uses, such as residential and hotel uses, could compromise the economic function and future growth of the Locally Significant Industrial Location.</p> <p>In line with existing and proposed Local Plan policies, all development should</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>the allocation to be made appropriate of a mix of uses, including residential and hotel. The second response also set out support for compact development of up to five storeys.</p> <p>DOT66 230-238 York Way, DOT71 43-45 Brewery Road and DOT72 55-61 Brewery Road each received one response highlighting opportunities for improved streetscape and environmental improvements.</p>	<p>consider opportunities for improving streetscape and making environmental improvements. It is not necessary to specifically highlight these requirements in the allocation.</p>
King's Cross and Pentonville Road	Historic England, individuals, Canal and River Trust, High Speed 1, community groups and individuals.	<p>There were 36 responses to the four allocated sites in the King's Cross area. The majority of responses (25) were in relation to DOT76 Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street. Of these, 22 were objections to the allocation on the grounds that proposed development of the site would impact neighbouring residential amenity, in terms of loss of privacy / overlooking, loss of light / overshadowing, noise pollution and light pollution. A number of responses request that the council produce an urban design framework for the area. Other concerns raised were in relation to impact on the canal's heritage character and the biodiversity and ecology of the canal. There was one response that supported the allocation.</p> <p>Statutory consultees responses were received from the Canal and River Trust, who requested that the allocation clearly set out that early engagement with them is required, and Historic England, who requested that the Conservation Area designation is highlighted in the allocation.</p>	<p>The purpose of the Site Allocations is not to set the parameters for detailed design. Potential amenity impacts will be assessed at application stage. None of the objections raise issues which demonstrate that the site is unsuitable in principle. The development considerations for Regent's Wharf highlights the need for development to respect the amenity of neighbouring residential amenity. An urban design framework is not considered necessary as the Local Plan and its supplementary guidance already has detailed design requirements. Support for the allocation noted. A requirement for early engagement with the Canal and River Trust is specified in the allocation.</p> <p>The Council notes support for the Pentonville Prison allocation. The provision of community and business</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>Nine responses were received in relation to DOT77 Pentonville Prison; of these, 6 were in support of the allocation, noting the opportunity for the creation of new housing and public open space. One response in support of the allocation suggested future development should incorporate community / cultural uses. Historic England welcomed the reference to a 'heritage-led redevelopment scheme and noted that specific reference should be made to the Grade II listing. The Ministry of Justice's response suggested the inclusion of other uses such as community and business.</p> <p>High Speed 1 responded to DOT74 setting out that development on the northern part of this site is unlikely in the foreseeable future, due to its function as operational railway land.</p>	<p>uses is now required. The Council notes support for the 'heritage-led' approach; allocation now refers to Grade II listing,</p> <p>The allocation for the King's Cross Triangle site recognises that the northern part of the site is unlikely to come forward for development in the near future, but highlights that the allocation will apply, should this portion of the site be deemed surplus to requirements.</p>
Bunhill and Clerkenwell	Historic England, community groups, individuals, commercial property owners, Canal and River Trust and TfL Commercial Development.	<p>There were 142 responses to the sites allocated in the Bunhill & Clerkenwell area. A significant proportion of responses were received in relation to two allocations; DOT81 Finsbury Leisure Centre, which received 29 responses; and DOT127 Braithwaite House & Quaker Court, which received 21 responses. 48 other sites received at least one response.</p> <p>A significant number of the responses to DOT81 Finsbury Leisure Centre were objections to the allocation. The main concern was related to the potential redevelopment of the sport courts, which is not formally designated as open space / open land. Other concerns raised were related to potential amenity</p>	<p>The allocation for the Finsbury Leisure Centre requires the re-provision of a high quality leisure centre, as well as public open space. In terms of comments in relation to detailed design, these potential issues will be addressed as part of the planning application process. The nearby Conservation Area and heritage assets are highlighted as constraints and will be an important factor in any future determination. The objections raise no in principle issue that would prevent allocation of the site for the proposed uses.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>impacts on nearby residential properties, in terms of loss of light, privacy, increased footfall, impact on views of local landmarks, and impacts on mature trees and the nearby Conservation Areas.</p> <p>The majority of responses to DOT127 Braithwaite House were objections. Respondents were concerned about the loss of amenity space, loss of car parking, increased traffic and congestion and disruption from potential construction work. There were also questions / concerns about the detailed design of any proposed development, for example fire safety and evacuation and the number and type of dwellings proposed.</p> <p>One response to DOT132 Queen Mary University, objected to the allocation in relation to the potential impact on the character of the Conservation Area, open space provision, and wildlife habitats; specific concern was expressed about increased building heights. Queen Mary University responded requesting that student accommodation be included under the options for future use, to allow for effective management of existing student accommodation on site.</p> <p>Site DOT106 Finsbury Health Centre received 5 responses. A response from the Catherine Griffiths Clerkenwell Community Tenants and Residents Association set out the importance of the health centre to the local community and requested that any future of the site preserves the building, as well as the Conservation Area. Historic England set out support the</p>	<p>Regarding responses to the Braithwaite House allocation, the Site Allocations cannot address the specifics of any development proposal. Its purpose is to establish potential uses and the type of development. The objections raise no in principle issue that would prevent allocation of the site for the proposed uses.</p> <p>In relation to the Queen Mary University Allocation, any subsequent planning application for the site must be in line with the Council's planning policies, including in relation to building heights, Conservation Areas, open space and wildlife / habitats. The draft plan does allow for student accommodation on sites with existing student accommodation, subject to specific criteria.</p> <p>The allocation for the Finsbury Health Centre requires the refurbishment of the existing building for healthcare purposes. The Council notes support from Historic England in relation to the continued health use of the site. Proposed policies in the Draft Local Plan detail that the loss of certain community uses may be acceptable where this is part of a wider</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>continued healthcare use of the Grade I listed building, given its history. NHS Property Services set out that the existing allocation is not sufficiently flexible and that any loss of healthcare facilities should be considered as part of a wider estate reorganisation programme.</p> <p>In response to DOT85 198-208 Old Street (petrol station), there were two responses which were not related to development principles, but rather the legal issue of 'right to light'. The landowner, Shell UK Limited, set out the proposed land uses are too prescriptive, and noted their objection to the allocation and fact that they have no plans for redevelopment.</p> <p>In response to DOT129 building adjacent to railway line and opposite 18-Farringdon Lane, TfL Commercial Development welcomed the inclusion of the site and requested the options for future use be amended to include residential.</p> <p>There was support for the retention of D1 use, more specifically as a centre for performing arts, in relation to site DOT131 Italia Conti School, 23 Goswell Road.</p> <p>DOT105 - 68-86 Farringdon Road (NCP carpark) attracted two objections related to potential impacts on amenity and the local community. A response from the landowner requested that the recent planning permission is reflected in the allocation.</p>	<p>estate consolidation programmes, although the prominence of this particular use at this site warrants particular heightened protection.</p> <p>The allocation for 198-208 Old Street now references the nearby Conservation Area. 'Right to light' is a legal issue outside the planning system. Other impacts on amenity would be taken into account as part of any planning determination. The proposed uses are considered suitable and take into consideration the sites location within the CAZ.</p> <p>DOT129 has been allocated for business use, in consideration of the sites existing use and location within the CAZ. Residential use is considered unsuitable.</p> <p>The Council notes support for the inclusion of community use at the Italia Conti School site.</p> <p>Regarding DOT105, the site has planning permission, which is now reflected in the allocation. Any further amendments or new applications will need to accord with policies which protect local amenity.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>The Canal and River Trust, in response to sites DOT79 - City Forum and DOT121 - Central Foundation School, highlighted future consultation requirements and recommended early engagement with the trust.</p> <p>The London Fire & Emergency Planning Authority noted that the boundary for site DOT103 - Clerkenwell Fire Station was incorrect.</p> <p>DOT90 - Cass Business School received three responses, requesting an amendment to site boundary to reflect actual business school; that wording from existing allocation is reinstated; and expressing concern about potential height increases.</p> <p>A response to DOT104 - Mount Pleasant Post Office requested an amendment to the site boundary and reference that scheme has been implemented.</p> <p>Responses to DOT113 - Oliver House, 51-53 City Road noted the poor current condition of the building and expressed support for office or affordable housing on the site.</p> <p>Responses to DOT112 - Monmouth House noted error in boundary and expressed concern about negative amenity impacts of approved development on adjacent properties.</p> <p>Responses to DOT107 - Angel Gate noted potential scope to intensify use of site but highlighted potential</p>	<p>Recommendation to engage with the Canal and River Trust has been added to requested sites.</p> <p>Boundary for Clerkenwell Fire Station has been amended as requested.</p> <p>DOT90 boundary has been amended as per request. The original allocation has not been reinstated as the wording is already considered sufficient. Building heights will be subject to assessment against policy as part of any planning application.</p> <p>Changes to DOT104 boundary made, and reference to implementation added.</p> <p>DOT113 is considered appropriate for business use.</p> <p>DOT112 boundary has been amended. The site has planning permission; this allocation (and other plan policies) would apply to any new applications or amendments to existing scheme.</p> <p>Any applications for the Angel Gate site will need to demonstrate that impacts on existing businesses are mitigated/prevented. The allocation no</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>impacts on existing small businesses. The landowner supported amending the allocation to allow for significant office and residential development.</p> <p>The landowner of site DOT133 - Travis Perkins, 7 Garrett Street requested change to current use in allocation and noted aspirations for continued builders' merchant use alongside residential use.</p> <p>Objection to continued inclusion of DOT111 - 2, 4-10 Clerkenwell Road, 29-39 Goswell Rd, as respondent considers development has commenced and should be exempt from allocation.</p> <p>Comments received on site DOT117 - Triangle Estate supported delivery of some housing but objected to large-scale redevelopment. Issue with site boundary raised.</p> <p>Support for DOT116 - Finsbury Business Centre but request for amendment to boundary.</p> <p>Response from Moorfields Eye Hospital NHS Foundation Trust and University College London in relation to DOT118 - Moorfields Eye Hospital noted that the scale of the City Road site could lend itself to a variety of uses, a residential component should not be discounted given that housing is the most acute pan-London need.</p>	<p>longer proposes residential use to reflect the existing need for business uses and the emerging policy context for the area.</p> <p>Regarding DOT133, there is no evidence of SG use, therefore no change has been made. Residential use is not considered suitable. Allocation proposes intensification of business uses which would allow continued operation/expansion of current operation as well as potential additional business floorspace such as offices.</p> <p>In relation to DOT111, existing implemented permissions are not in themselves reason for not allocating a site. The council's survey information suggests permission on this site has lapsed.</p> <p>DOT117 reflects permitted application. Site boundary has been amended to reflect this permission.</p> <p>DOT116 has been amended.</p> <p>The Moorfields site is considered to be a commercial site given its location near Old Street Roundabout.</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>Response to DOT120 - The Pentagon, 48 Chiswell Street noted that site plan does not show correct building and supported intensification of office use, noting potential for a couple of extra storeys.</p> <p>easyHotel object to inclusion of allocation DOT123 - 80-86 Old Street (EasyHotel), but considered that any allocation should highlight suitability for intensification of commercial land uses; refurbishment of the building to support such uses, and noted that any full scale redevelopment should be for hotel or a combination of office and hotel, or office.</p> <p>Response to DOT82 - 1 Pear Tree Street requests that allocation reference existing permission with potential for intensification of business uses.</p> <p>Concern raised about DOT93 - Peabody Whitecross Estate.</p> <p>Support for DOT98 - Farringdon Place, 20 Farringdon Road; response notes possibility of improvements to façade. Respondent noted issue with identified ownership.</p> <p>Response to DOT99 - Lincoln Place, 50 Farringdon Road considers that allocation does not optimise the development potential of the site; there is a significant opportunity for new commercial office development which could be sensitively developed whilst respecting local views. The advent of Crossrail in December 2018</p>	<p>DOT120 map has been corrected. Allocation notes suitability for intensification. Scale of any proposal would be assessed against relevant policies; it is not appropriate to identify suitability of additional storeys in allocation.</p> <p>DOT123 is conserved to be a priority office site and should be office-led. The allocation notes potential for refurbishment of hotel. Emerging hotel policy allows for intensification of existing hotels where certain criteria are met.</p> <p>DOT82 references permission and notes suitability of further intensification for business use.</p> <p>Response to DOT93 concerns permitted application, which allocation reflects.</p> <p>Support for DOT98 noted. Allocation references potential for improvements to frontage. Land Registry information suggests freehold ownership information is correct, so no change has been made.</p> <p>Regarding DOT99, the scope for development is context. Impact on local views would be assessed as part of</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>will provide this area with growth opportunities that should be maximised. Potential to bridge over the railway and create a new public square set around new commercial development.</p>	<p>planning application; an allocation should not set out suitability of design. Feasibility of bridging over railway not proven, hence not appropriate to include in allocation. Allocation would not preclude coming forward in future where further work undertaken and it can be demonstrated that adverse impacts were prevented/mitigated.</p>
Other Important Sites	<p>Historic England, individuals, TfL Spatial Planning, commercial property owners, local businesses, Sport England and community groups.</p>	<p>Eighteen ‘other important sites’ (located outside of key areas) were consulted on, of these, 16 of the sites received a total of 48 responses.</p> <p>Two of the responses to site DOT141 Highbury Delivery Office expressed that the site should be suitable for either housing and business use, or wholly housing. Another response opposed residential use and supported business use.</p> <p>There were four responses to DOT142 Legard Works, three of which supported the allocation for continued business use. One response set out opposition to any further development of the site, for either for business or residential use.</p> <p>Three responses to DOT144 500-502 Hornsey Road and Grenville Works were received. Respondents expressed concern over the potential impact on existing residential amenity and on the impact of the potential intensification of business use. Responses suggested</p>	<p>It is considered that the Highbury Sorting Office is an employment use and therefore allocated uses should reflect this. The allocation permits an element of residential use. A wholly residential development would be inappropriate and would result in the loss of business space.</p> <p>The Council notes support for the Legard Works allocation. In response to the objection around further development, the site has been subject to a planning application, and is considered to be a suitable development site in principle.</p> <p>In response to the allocation for 500-502 Hornsey Road and Grenville Works, detailed issues around the potential impact on residential amenity will be addressed through the planning</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>including 500-502 Hornsey Road in boundary. One respondent suggested that suitability for residential be included where no loss of business floorspace.</p> <p>Support for continued business use was set out for Site DOT135 Leroy House, 436 Essex Road; DOT136 The Ivories, 6-8 Northampton Street; DOT137 Belgravia Workshops, 157-163 Marlborough Road; and DOT138, 1 Kingsland Passage. Minor rewording was suggested to remove reference to valuable employment space.</p> <p>One response to DOT139 Bush Industrial set out that the site should be allocated for a mix of uses, including business and residential.</p> <p>Responses to DOT150 Harvist Estate Car Park raised concern about the availability of car parking, property values and service charges, whereas another was concerned about the potential for increased levels of antisocial behaviour, from increased population.</p> <p>DOT149 Athenaeum Court received one objection, due to the potential amenity impact on neighbouring residential properties. Another response was supportive of the allocation, given the potential for the delivery of new homes, provided the community was fully engaged.</p> <p>Responses to DOT151 Hathersage and Besant Court and DOT152 Wedmore Estate Car Park were mixed, with some support and some objection. Support was</p>	<p>application process. Boundary change has been made. Site is considered to be an employment site; therefore, the allocation does not reference residential use.</p> <p>The Council notes support for the following allocations: Leroy House, 436 Essex Road; The Ivories, 6-8 Northampton Street; Belgravia Workshops, 157-163 Marlborough Road; and 1 Kingsland Passage. Allocation wording has been amended.</p> <p>In relation to the Bush Industrial site, the introduction of non-industrial uses – particularly residential uses - has the potential to harm such areas, which are important in terms of serving the local economy and providing local employment.</p> <p>The issues raised in relation to the Harvist Estate Car park are not planning issues. Impacts on amenity will be assessed as part of any planning application.</p> <p>The Council notes support for the Athenaeum Court allocation. Potential amenity issues will be assessed through</p>

Table 3.2: Summary of responses to Site Allocations: Direction of Travel consultation (February 2018) by strategic location

Strategic Location	Respondents	Summary of Responses	Response in Draft Local Plan
		<p>related to the potential for new / improved open space, whereas objections were mainly related to amenity impact on neighbouring residential properties, potential disruption during construction and loss of car parking.</p> <p>Objection and concern raised about DOT145 - Parkview Estate, Collins Road, in relation to potential impacts on amenity and impact of construction works. One response requested amendment to boundary to exclude privately owned properties at 120-126 Highbury New Park</p> <p>Support for DOT138 - 1 Kingsland Passage. Request to include reference to suitability for D1 floorspace.</p>	<p>the planning application process, not through the Site Allocations plan.</p> <p>The Council notes support for the Hathersage and Besant Court and Wedmore Estate Car Park allocations. Regarding the objections, amenity impacts will be assessed through the planning application process. The Local Plan supports car-free development so re-provision of parking spaces is not a priority, except for disabled parking</p> <p>In relation to DOT145, site has planning permission. Boundary amendment has been made.</p> <p>Support for DOT138 noted. D1 uses are not considered a priority for DOT138.</p>
N/A – general comments; comments relating to multiple sites	Sport England, Historic England	<p>Sport England set out that additional residential development will increase demand for sports facilities which may cause a deficiency, and that new sports provision should be provided.</p> <p>Historic England requested that Conservation Areas and relevant heritage designations within and near sites are identified for relevant sites.</p>	<p>Sport England’s response is noted. The Council is undertaking a sports facilities study to inform need. The scope of the study has been discussed with Sport England and will address need across the Borough.</p> <p>Conservation Areas and heritage assets have been highlighted under site designations and constraints where relevant.</p>

4 Local Plan: Regulation 18 (November 2018)

- 4.1 This section sets out the details of the Regulation 18 consultation on the following Local Plan documents, including details of when the consultation took place, who was consulted, and the consultation methods undertaken.
- Strategic and Development Management Policies;
 - Site Allocations; and
 - Bunhill and Clerkenwell Area Action Plan.
- 4.2 It provides details of when the consultation took place, who was consulted, and the consultation methods undertaken.
- 4.3 The Regulation 18 consultation on the above documents ran for a period of 8 weeks between Tuesday 20 November 2018 and Monday 14 January 2019.
- 4.4 The consultation included the following:
- Site notices at sites proposed to be allocated – for larger sites, more than one notice was erected.
 - Notification on the council’s consultation website and on the ‘Local Plan review’ webpage of the council’s website.
 - Approximately 6,700 letters and emails sent out to:
 - those registered on the policy consultation database including statutory consultation bodies;
 - respondents to previous consultations and people who expressed an interest in being notified of future plan consultations;
 - landowners (including people with a leasehold interest in sites); and
 - residents/businesses who are in close proximity to the proposed sites which were not consulted on in the February 2018 Direction of Travel consultation (considered to be within 30 metres).
 - Promotion of the consultation on the Council’s Twitter feed.
 - An article in Islington Life magazine which is distributed to Islington residents, and information in the Islington residents’ eBulletin sent to email subscribers.
 - Two drop-in sessions at the start and end of the consultation period, where people could speak to officers about any element of the proposed Local Plan.
- 4.5 In total, 201 email / letter responses were received. In addition, 656 ‘set responses’ were received in relation to Tileyard Studios. The main issues that were raised during the consultation are summarised by policy, allocation or document section in Table 4.1. Information on how the Regulation 19 draft Local Plan responds to these issues is also set out in this table.

Table 4.1: Summary of responses to Islington Local Plan Regulation 18 draft documents consultation (November 2018)

Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
Strategic and Development Management Policies			
Introduction	Islington and Camden Public Health, City of London Corporation and local group.	Question why specific site (Sotheby Mews) is not included in document. Same respondent also questioned para 1.3 comment re: continuous co-operation and what happens if this is not adhered to. Request that health and wellbeing is specifically referenced in para 1.8. Support for para 1.2, that each and every development must make the most of every site.	Amendment to para 1.8 not necessary as importance of health is evident in rest of plan and this section sets out procedural context. Sotheby Mews site not considered to warrant allocation; there are several policies which would guide development on this site if development does come forward. Plan sets out broad strategic approach/support for continuous co-operation to deliver plan objectives; it is not appropriate to comment on issues on individual cases/sites.
Islington in context	Local resident	Comment about balancing act in terms of accommodating new development while protecting open spaces and residential amenity – resident considers that such impacts would not contribute to making Islington a fairer borough.	The Local Plan identifies a number of priorities related to housing, economy, sustainability, transport, etc. Balanced judgements may be necessary on certain schemes where it is not possible to deliver fully in accordance with all policy priorities.
Vision and objectives	Range of comments received from statutory consultees, local organisations and residents, as well as a landowner and a business based in Islington.	<p>Support for various elements of the vision and objectives.</p> <p>Historic England, TfL and Sport England request additional wording to reflect their areas of importance.</p> <p>Local group question a proposal to locate social facilities away from Public Transport routes, which it is suggested does not align with objectives.</p> <p>Local group and resident welcome clear commitment to minimise Islington's contribution to climate change and mitigate its impacts but consider that more ambition is needed in certain areas.</p> <p>Local resident comments on objectives relating to safety, green space and children and young people re: Andover Estate. Concern about impact of new development re: continued safe access for existing residents and with regard to loss of formal and informal places to play and exercise.</p> <p>A local resident, landowner (Folgate Estates) and a business all made supportive comments specifically regarding objectives of fairness and inclusivity, increased growth and new homes. Although there was acknowledgement of the challenges with these objectives due to decreased central government funding.</p>	<p>Several amendments made in response to comments from Historic England, TfL and Sport England.</p> <p>Social facilities must be convenient and accessible in line with policy SC1.</p> <p>Council are committed to tackling climate change through sustainable design but note there are constraints which affect the scope with which planning can fully tackle climate change, including Government policy and guidance.</p> <p>Comments re: Andover Estate refers to a specific planning application for new homes which has been approved. Planning determinations are assessed on a case-by-case basis. The draft Local Plan sets out the strategic importance of Green Infrastructure and has a range of policies to protect amenity; key design principles underpin the plan.</p>
Site appraisal and design process	Comments received from statutory consultee, local organisation and resident, as well as a business based in Islington.	<p>Several amendments/clarifications suggested including clarity on difference between site appraisal and design process.</p> <p>Local resident expresses concern with previous interpretations of design guidance on specific schemes and highlights impacts on residents where commercial development is located in close proximity to existing residential properties.</p>	<p>A number of amendments will be made to this section, including several in response to comments raised.</p> <p>In response to local resident concerns (and other comments received), policy DH5 will be amended re: impacts of commercial uses in close proximity to residential uses.</p>
Policy SP1: Bunhill & Clerkenwell	Comments received from Corporation of London and GLA, landowners and local group	<p>Corporation of London request supporting text makes reference to the Cultural Mile aspirations.</p> <p>Landowners express their general support, with one commending the focus of Bunhill and Clerkenwell as the area to expect most growth, particularly sustainable business floor space. Local group request the</p>	<p>Reference to the Cultural Mile will be reflected in the AAP.</p> <p>Policy BC8 of the AAP supports the proposed Clerkenwell Green scheme. Other suggested inclusions are not considered necessary as they relate to spending of S106/CIL contributions which would in principle be suitable based on current draft plan policies.</p>

Table 4.1: Summary of responses to Islington Local Plan Regulation 18 draft documents consultation (November 2018)

Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
		<p>implementation of proposed Clerkenwell Green improvements, vehicular closure of southern end of St John Street and a new public space funded by developer contributions.</p> <p>GLA supportive and office growth aspirations conducive with London Plan policy E1, SD4, SD5. Indicative housing and employment floor space should be included.</p>	<p>Indicative capacity figures will be included in next iteration of the plan.</p>
<p>Policy SP2: King's Cross and Pentonville Road</p>	<p>Range of comments from statutory consultees (TfL, Canal and River Trust), landowners, local groups and a resident.</p>	<p>Pentonville Road, Penton Rise and Kings Cross should be fully included in the SP2 spatial strategy and not 'fringe locations'. General and social problems need addressing here.</p> <p>TfL request aspiration to reopen York Road station should be removed and Part F should reference bus journey time and bus priority improvements.</p> <p>Resident makes several comments including: low density, poor quality housing should be replaced; York Way station reopening supported but in conjunction with GLA backing; support for Part E but should be a site allocation; support for Part F but requires specific cycling and pedestrian improvements and Caledonian Road should be prioritised for car reduction measures; support Part G but indicative east-west connection not realistic. Bingfield Street route more appropriate and direct; site allocations supported but All Saints Church and Orkney House should be allocated as well.</p> <p>Landowner questions the exclusion of CEMEX concrete batching site from CAZ and request its inclusion to protect existing businesses. Policy should mention agent of change to offer specific protection for CEMEX from new development. Acknowledgement and provision for HGVs turning in and out of site should be included in improvement to cycling and pedestrian connectivity.</p> <p>Statutory consultee comments on need for cycle/pedestrian improvements along Regents Canal in Fig. 2.3 using developer contributions where necessary and welcomes Regents Canal as a heritage asset. Suggestion to include 'cyclists' in first sentence of Part H. In relation to Point I there is concern about need to protect leisure provision which could frustrate residential mooring schemes as London Mooring Strategy highlights increases in boat living. Policy should be amended so leisure provision as a whole should remain supported but at site level should allow for long term loss of leisure provision.</p> <p>Strong support for east to west cycle route by local cycling organisation and support for safeguarding existing and supporting new business floor space made by a landowner.</p>	<p>Spatial strategies set out long term vision including how to tackle traffic, poverty and homelessness. SP2 includes areas mentioned.</p> <p>Changes to Part F in response to TfL comments will be made.</p> <p>It is considered Local Plan policies provide sufficient guidance to enable sustainable intensification of the key area. Support for reopening of York Way noted, however the council considers amendments are necessary in line with TfL comments. Amendment re: cycling and pedestrian improvements unnecessary, these would be supported by policies T1 and T2. East to west routes are indicative and do not preclude improvements along Bingfield Street. The council consider that the proposed sites do not warrant specific allocation – see response to site allocations general comments.</p> <p>CEMEX site is protected for business use through Policy B3; extension of the CAZ is not considered to be justified, especially if it was to solely strengthen protection for one operator. Policy DH5 would apply to applications, there is no need to repeat in SP2; Policy DH3 also has a specific criterion requiring tall buildings to not prejudice ongoing functionality in local area. East to west routes are indicative and any new/improved routes would consider the existing road network and nearby uses to ensure efficiency and safety.</p> <p>Fig 2.3 visualises the east to west access broadly and a Regent's Canal scheme may also be acceptable. Reference will be added re: cyclists. In relation to Part I, borough wide consideration of leisure may not pick up specific residential mooring situations that would have an impact on leisure provision. By removing the requirement to consider local impacts this would effectively heighten importance of residential moorings over leisure which the council does not support.</p>
<p>Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site</p>	<p>A number of comments from landowners, and several hundred 'set responses' received linked to Tileyard Studios. Response also received</p>	<p>Landowner supports the LSIS designation and is supportive of the five storey height limit to prevent the lightless and oppressive streetscapes seen elsewhere. Also supportive of restriction of uses to business and industrial. The threat of residential development requires such a designation as the LSIS.</p>	<p>Support to retain the character and business environment of the LSIS; building height parameters and use class restrictions is noted.</p> <p>A height restriction of five storeys is informed by a detailed urban design study and it is noted that five storeys gives significant opportunity for intensification of uses given the prevailing height is lower. This is a plan led</p>

Table 4.1: Summary of responses to Islington Local Plan Regulation 18 draft documents consultation (November 2018)

Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
	<p>from local transport group, a music industry body and the GLA.</p>	<p>GLA welcomes intention to intensify/maintain industrial floor space which is in line with Draft London Plan Policy E4.</p> <p>656 set responses were received relating to impacts on Tileyard Studios primarily from businesses operating there. Responses were largely the same, including issues with policy B2 and objections to the proposal in policy SP3 to reduce the maximum building height from 30 to 20 metres in the LSIS which was claimed to be contrary to NPPF and London Plan's encouragement of intensification. Respondents want no height restriction. Landowners also air similar views stating height restrictions are not based on evidence and contrary to London Plan intensification objectives.</p> <p>Body representing the music industry states that the implementation of policy requiring B1 space to only be developed if it results in the building being predominantly industrial use would harm the music industry's investment and expansion at Tileyard and the areas development as a music hub. Request for the existing policy approach to be maintained.</p> <p>Landowners suggest that by Part C and D presuming against the introduction of additional B1a space this would limit growth. Framework should seek to retain existing industrial uses but with flexibility to enable introduction of B1a use as part of mixed use development.</p> <p>Landowner welcomes explicit reference to B8 uses as acceptable within the LSIS. Comment also made that it is unclear whether SP3 sub section views B8 use supplemented by flexible B1a use as a hybrid use.</p> <p>Local group want to ensure new walking routes and link up with Camden plans for improving Agar Grove.</p> <p>Landowner of Tileyard Studios (CPP) provides detailed background information and comments on the proposed policy.</p> <p>CPP owns and operates Tileyard Studios ("Tileyard"), a cluster of creative workspace located within the Vale Royal / Brewery Locally Significant Industrial Site ("LSIS") which includes music studios, offices, co-working space, an incubator and accelerator unit along with a range of business support services and facilities. Response provides information on Tileyard operation, its economic benefits and the case for its continued growth.</p> <p>As a direct result of CPP's stewardship the Tileyard cluster now supports over 1,000 jobs, across 150 businesses, many of which have been founded at the estate. It is therefore uniquely well-placed in its detailed understanding of the requirements for the creation and enhancement of such a cluster, and the appropriate planning policy for the LSIS.</p> <p>CPP consider that it is vitally important that the local planning authority listen to what CPP has to say. CPP is very concerned that the current proposed policies – which represent a marked shift away from the adopted policy framework in relation to the LSIS - are likely to have</p>	<p>approach operating in conjunction with policy DH3. Development exceeding these heights could create a canyon effect due to narrow street profiles and could weaken the industrial character and negatively impacting upon historic buildings.</p> <p>The council disputes the wider LSIS would be classed as a music business hub. Tileyard Studios itself could be classed as such and can continue to operate regardless of local plan policies. The wider LSIS is important and scarce industrial land which provides vital services for the central London economy but also a major employer and economic contributor. Office use would undermine the industrial function.</p> <p>There is B1 accommodation within the LSIS, however, it is evident that the primary economic function is industrial. The Council rejects the idea that there has been a fundamental shift to B1 use in the LSIS. A restrictive approach is needed to safeguard the most significant remaining industrial area in the borough. The GLA response shows this is consistent with the draft London Plan.</p> <p>It is not possible to give a specific definition of hybrid space as it may change based on a number of factors including the area where it is proposed, the mix of other uses within a scheme and/or the proposed occupier; it will ultimately be determined on a case-by-case basis. The council will set out a 'skeleton' definition in the Glossary.</p> <p>Increased pedestrian and vehicular connections in the LSIS are supported in the plan. Due to this being a functioning industrial area there may be practical limitations on the extent of new walking routes. Any cycle/pedestrian improvements would take into account surrounding context and plans.</p> <p>The Council notes background information on Tileyard Studios. Background information includes comments on the proposed policy approach in the area; the Council's response to these comments is provided below in relation to other comments on policies B1, B2 and SP3.</p> <p>The council disputes the claim that the draft Local Plan represents a marked shift from the adopted policy. A marked shift would be a fundamental change in policy, which is not the case with the proposed policy. Current policy protects industrial uses and prevents proposals which would be detrimental to, and compromise, its industrial function. The current policy was itself carried over from the UDP which designated the area as an Industrial and Warehousing Area (IAWA).</p> <p>Re: comment on occupancy levels in 2007, it should be noted that the area was an industrial area at this time and had been for the preceding century. This period coincided with the recession of the late 2000s, so it is not surprising that occupancy may have been affected during this time. We note the recent ELS which highlights that occupancy rates are currently very high. CPPs claim that they are effectively the saviours of the area are false. They have benefited from (at the time) relatively low value land, the value of which was most likely kept low by the industrial designations.</p>

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		<p>exactly the opposite effect of the local planning authority's stated objective, and in fact lead to the suppression of the continuation or enhancement of the success of the LSIS.</p> <p>Indeed, it is relevant to note that shortly after CPP acquired the core Tileyard estate in 2007, occupancy levels were very low, less than 100 people were employed at the site and over half the accommodation was vacant or under-utilised. In a relatively short period of time CPP has managed to transform the estate, and consequently the fortunes of the LSIS, to create the economic cluster of local, regional and national significance that is covered by current, adopted policy in respect of the LSIS.</p> <p>This regeneration has only been possible because the existing set of policies has secured the appropriate degree of flexibility for the provision of the sort of working space that this creative sector requires. Whereas, the proposed policies in the emerging documents are seeking to impose a misguided restriction on the continued delivery of such floor space for that creative sector which, if implemented, would threaten its very success, as well as the success and protection of the LSIS itself.</p> <p>CPP acknowledges that it is clearly important that the local planning authority has an appropriate policy framework for managing future development in the LSIS. However, this framework must encourage and support the creative sector in the LSIS and recognise the benefits, and facilitate the continued delivery of, the fluid and intensive types of Class B1 uses that gravitate around the Tileyard cluster and have made such a significant contribution to the ongoing growth and success of the LSIS.</p> <p>It is very unfortunate (and contrary to good practice) that the draft policies have been produced without proper engagement and consultation with the key LSIS stakeholders, including CPP; this has led to the production of draft policies which are inherently unsound (within the meaning of the NPPF (July 2018)).</p> <p>In particular, we note that the local planning authority purported to undertake consultation in March 2017 regarding the future of the LSIS to which a significant number of businesses in the area responded urging the local planning authority to adopt a positive policy framework to facilitate further growth of the creative cluster. Despite indicating that it would undertake further consultation with stakeholders (in accordance with its Statement of Community Involvement), the local planning authority has simply pressed on with a draft policy which fails to: reflect the function of the area; respect the wishes and requirements of businesses operating in this area; and achieve the economic outcomes it seeks to achieve.</p> <p>A central element of the LSIS's success, as with any thriving industrial and employment area, is the flexible provision of Class B1(a) floorspace and uses, as well as Class B1(b) and Class B(1)(c), coupled with the retention of B2 and B8 uses (often with enhancements which mixed-use developments can deliver). It is also now very frequently the case that it</p>	<p>The council consulted on a discussion paper to inform a planned SPD for the area, which was intended to be an interim position, until the Local Plan review is progressed. However, the Local Plan review was then progressed as a priority and the SPD preparation was aborted and subsumed into the Local Plan review process. In light of the above, it was considered unnecessary to pursue an SPD as well. The responses to the proposed SPD and the evidence which was produced to inform it, have formed part of the considerations when preparing the Local Plan policies for Vale Royal/Brewery Road LSIS.</p> <p>The council has undertaken consultation on the Local Plan and the potential SPD in line with statutory requirements and the SCI.</p> <p>The Council's Employment Land Study (2016) provides a detailed analysis of the character and function of the Vale Royal / Brewery Road LSIS. It provides commentary on the uses, building typologies, and occupants, and notes that much of the LSIS is industrial use. Whilst there have been some losses of industrial floorspace within the LSIS, the Council would disagree that the concentration of industrial uses is less significant. It is evident that the primary economic function remains as industrial.</p> <p>The Council's approach to LSISs and industrial land and floorspace is underpinned by the Council's ELS, as well as London-wide evidence. The ELS highlights the extent to which industrial uses have been lost in the Borough - 436,000sqm lost between 2000 and 2012. The losses experienced in Islington are significantly above benchmark release figures, as set by the Mayor in the current London Plan and supporting guidance. The ELS therefore recommends that industrial uses in the Vale Royal / Brewery Road LSIS should be protected and intensified in order to meet demand.</p> <p>The council's approach is supported by the Mayor in his response to the Reg 18 consultation, and is considered to be in line with the draft London Plan.</p> <p>The Vale Royal / Brewery Road LSIS is under significant development pressure to deliver office floorspace. Such development could seriously harm the area's primary economic function and could lead to the deterioration and gradual loss of industrial uses in this area. The introduction of B1 space is permitted, when provided as part of a hybrid workspace scheme, but it must constitute a small proportion of the overall proposal. The Council recognises the employment potential from B1 development, which is why B1 is strongly encouraged in the CAZ, Priority Employment Locations and Town Centres.</p> <p>In response to CPPs 'sound planning case' for expanding the Tileyard cluster, set out in reasons (a) to (e), the council disagrees that retaining industrial uses should take place alongside the encouragement of employment uses (particularly B1a/open B1) generally. The Vale Royal / Brewery Road LSIS is the Borough's last major concentration of industrial uses and should be safeguarded for such uses. The development of other</p>

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		<p>is not possible to compartmentalise the activities of this creative sector in terms of these uses.</p> <p>The wider LSIS is characterised by a mix of business, industrial and storage activities. However, due to the emergence in recent years of Tileyard, and as recognised in the Islington Core Strategy (and evidence base), the actual uses in the area have changed meaning that the concentration of industrial / warehouse uses has become less significant. CPP understands the need to retain a reservoir of land for less 'business type' uses as part of the capital's infrastructure. However, there is a sound planning case for expanding the Tileyard creative cluster around the southern quadrant of the LSIS (i.e. to the south of Brandon Road), and put in place an effective policy context in the new Local Plan which (unlike the draft policies now proposed by the local planning authority) maximises economic benefits and results in more efficient use of land, for the following reasons:</p> <p>(a) A recognition of the benefits of mixing industrial / warehouse activity with B1 uses has already happened in parts of the Industrial and Warehouse Area ("IWA") / LSIS (and, in any event, often does not require planning permission);</p> <p>(b) Notwithstanding this, there is still a significant cluster of industrial / warehouse uses in the IWA / LSIS along Blundell Road and Brewery Road in purpose-built accommodation that is not suitable for change of use to B1 but which can operate in harmony with B1 uses in the area, or provided by way of additional floorspace with such accommodation;</p> <p>(c) The Tileyard cluster represents a discrete quarter of the IWA / LSIS which is physically (in terms of building stock and neighbouring uses) inherently suited to B1 type activities, including B1(a).</p> <p>(d) B1(a) accommodation is a fundamental ingredient of any LSIS and successful employment zone, particularly in an urban area. It can and should be co-located with industrial and storage uses in a manner that makes more efficient use of land (including, for example, at upper levels above other uses). This is entirely consistent with planning policy at a London-wide and national level. However, an approach which seeks to suppress provision of such floorspace - as now proposed by the local planning authority – will serve only to restrict and stifle the productive use of the area for all uses, including B2 and B8.</p> <p>(e) The intensification of B1 uses within the Tileyard quarter itself is needed in any event, and will provide significant (local) employment and economic opportunities; and</p> <p>The attempt by the local planning authority now to do so (particularly by imposing arbitrary restrictions as to the proportion of each such sub-categories of use) is not just misguided, but also seriously threatens the future success of these creative sectors where, amongst other things, the ability to innovate is key.</p> <p>In its current form the draft Local Plan would seriously and unnecessarily impose restrictions on the continued growth and success of Tileyard Studios (and its associated economic benefits), and would fail to make efficient use of accessible land contrary to Government policy and</p>	<p>business uses is strongly encouraged in CAZ, Priority Employment Locations and the CAZ fringe spatial strategy areas, and is generally permitted throughout the Borough. The LSIS makes up less than 1% of the Borough's total land area. The development of non-industrial uses in this location will diminish the existing stock of industrial uses and will likely prevent future intensification of such uses. The introduction of non-industrial uses could also threaten the industrial character of the area and negatively impact existing industrial uses. The expressed 'need' for Tileyard's expansion in this location does not relate to an inherent need to support Islington's economy, but rather a commercial drive for expansion by the landowner. Regardless, the policy does allow for hybrid and/or B1c uses which can be utilised to expand Tileyard in a policy compliant way.</p> <p>Comments re: permitted development rights are noted, but are not considered particularly relevant. PD rights are separate to the Local Plan, and bound by specific restrictions. They can also be removed by an Article 4 Direction. CPP offer no evidence to support their claim that the LSIS policies will cause existing users to exercise PD rights.</p> <p>Pressure/demand for B1 space is one of the key reasons why a more restrictive approach is needed in the LSIS. The waiting list for Tileyard Studios is not relevant evidence of demand, and would not be reliable at any rate given that it is not independently verifiable evidence. Throughout their response, the landowner conflates Tileyard's 'needs' with the LSIS needs. The council's role is not to plan for Tileyard. The council is required to plan in the interest of the wider economy of the borough and of London.</p> <p>The building heights guidelines for the LSIS are underpinned by the Vale Royal / Brewery Road Locally Significant Industrial Site Height Study. The study's conclusions are based on detailed townscape analysis and a review of existing planning sensitivities and are considered appropriate. The study is an evidence base document which has informed the Local Plan; it is also capable of being a material consideration for relevant applications. CPP state the opposite but offer no rationale for this.</p> <p>The study has been available for comment during the consultation on the SPD discussion paper in March 2017 and the Local Plan Reg 18 consultation in November 2018. CPPs comment re: the lack of proper consultation is therefore somewhat surprising, especially given that they themselves commented on the study as part of their response to the SPD discussion paper in 2017.</p> <p>Policy SP3 is consistent with the NPPF and the draft London Plan; re: the latter, the Mayor considers the draft Local Plan to be in general conformity with the draft London Plan. CPP have cherry-picked a single policy from the NPPF and have not identified specific inconsistencies with the London Plan.</p> <p>Figure 1.7 does not identify that the LSIS is not sensitive from a townscape perspective. It specifically identifies heritage designations relevant to the area. There is more to townscape than heritage, and fig 1.7 provides only one layer of analysis in the study. CPP go on to note that the study has had</p>

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		<p>sustainable development objectives. Indeed, the purported attempt to prevent provision of additional appropriate B1(a) floorspace, whether in conjunction with additional B1, B2 or B8 floorspace, or in its own right, will suppress productivity within the Tileyard cluster and the wider LSIS. In addition, the policy would cause pressure on existing users to exercise well-established permitted development rights to use existing floorspace in the LSIS for B1(a) purposes, simply to protect against the artificial restrictions that are proposed in stifling future economic employment growth.</p> <p>The approach of the local planning authority to purport to suppress office space as part of the LSIS is also directly contrary to national policy, the London Plan and the existing Local Plan that has been successfully in place in the LSIS to date. Moreover, it is also contrary to the local planning authority's own evidence base, including the advice provided in their Employment Land Study which was commissioned in 2016 to inform the emerging policy. Accordingly, we strongly object to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2 of the Regulation 18 Islington Local Plan 'Strategic and development management policies' and draft associated 'Site allocations' DPDs (Allocations VR1 – 10) (November 2018). Suggested amendments to policies SP3, B1 and B2 provided.</p> <p>Respondent cites parts of the Council's ELS which they consider supports their approach. They also note the importance of regional policy and guidance, highlighting draft London Plan policies E6 and E7. It is clear from both the recommendations of the local planning authority's own evidence base and the Mayor's emerging London Plan that retaining an appropriate reservoir of accommodation for industrial and warehouse uses is important in order to meet the capital's wider needs, but this should take place alongside the encouragement of employment uses generally. It is equally clear that a rigid preservation of the LSIS for solely industrial and warehouse uses - as now promulgated by the local planning authority - would completely disregard the recommendations of its own evidence base, and would be contrary to the Mayor's objective to make more efficient use of land through the co-location of industrial activity with other uses.</p> <p>Furthermore, restricting the ability to create additional B1(a) space, alongside industrial and warehouses uses, would simply place additional pressure on the existing (limited) building stock resulting in the conversion of existing floorspace to B1(a) under permitted development rights. Draft Policy SP3 of the draft Islington Local Plan fails to recognise the fundamental ingredients behind the significant success of the LSIS to date despite the clear recommendations of its own Employment Land Study, and the prima facie economic and employment benefits that have resulted from the emergence of the Tileyard creative cluster.</p> <p>CPP supports the recommendations of the Employment Land Study, (and draft London Plan), that there should be no net loss of industrial floorspace within the LSIS. However, the consequence of draft Policy SP3 (parts C and D), which presume against the introduction of</p>	<p>no specialist heritage input but this is not explicitly necessary given that heritage only plays a part in informing the study's conclusions. CPP seem to be confused by para 2.33 of the Local Plan which references heritage, although given their comments which purport to have analysed the study in detail, it is unclear how they can be unaware of the other factors which have influenced the conclusions. Para 2.33 itself does not state that the height restrictions are solely due to heritage reasons.</p> <p>Re: comments of para 3.1(1), the study combined with other evidence - particularly the ELS - identify the characteristics of the area and the type of floorspace, including hybrid space, that can facilitate continued functioning of the area. CPPs comment that the study has no regard to the businesses that are located in the LSIS or those that want to locate there is self-serving and based on Tileyard's own business model; these businesses are not reflective of the wider LSIS function, hence why they would not logically be used to inform a study such as this.</p> <p>Whether CPP have "a unique and unrivalled understanding of the accommodation needs of the creative cluster" is debatable, but it is clear that there is a commercial motive behind their comments, which will naturally clash with restrictive planning requirements which look at issues spatially rather than a one-dimensional view based on the demands of a particular business.</p> <p>PBA paper noted. The paper does not add any weight to the main CPP objections and largely consists of selective references to the council's and the GLAs evidence base; it is not an independent study, rather it is a study specifically commissioned by CPP to validate their pre-existing opinion. Re: references to other boroughs' policy, it is unclear why this is at all relevant to the Islington context. We note that the GLA has found the draft Local Plan to be in general conformity with the draft London Plan, and has specifically noted that the LSIS policy approach is consistent with the draft London Plan.</p>

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		<p>additional office space, regardless of whether there is an existing office use on site, would severely limit any potential future growth of the creative cluster and the economic benefits arising. It is perverse and unsound. Indeed, it will have the opposite of its intended effect, and would threaten the LSIS and its future.</p> <p>The very strong demand for additional B1 space (including office accommodation) is demonstrated by the long-waiting list of businesses who want to move to Tileyard, and the need for additional space for existing businesses within the estate. Accordingly, the land-use policy framework (for the LSIS as a whole, and certainly the southern part) should seek the retention of existing industrial and storage uses (on a floorspace basis), but also permit and strongly encourage the introduction of B1 business floorspace (including offices), as part of mixed-use developments that would enable the more efficient use of land in accordance with sustainable development objectives and stimulate the success of all uses and create the ideal conditions of flexible accommodation for all types of employment uses, be they B1, B2 or B8.</p> <p>In the background information provided, one of the reasons CPP identify as being supportive for expanding the Tileyard Cluster is the fact that the area is not sensitive from a townscape perspective and it represents a highly sustainable location to optimise development outputs. They state that there is absolutely no townscape nor economic justification for making it subject to an unjustified blanket height policy.</p> <p>In terms of townscape, the Vale Royal / Brewery Road area comprises mainly industrial or commercial development of a generally low-scale and quality. The local townscape is unremarkable and fragmented, and has been significantly influenced by major infrastructure such as the railways and the construction of entirely utilitarian buildings developed in direct response to occupational needs.</p> <p>Historically, an industrial area north of the large swathe of land associated with the major railway interchange, it now lies on the northern edge of the Kings Cross Central regeneration area which has undergone transformational change, including new buildings of significant scale. To the east, the area is severed to a degree from wider Islington by the mainline railway cutting, whilst to the west the Maiden Lane development estate regeneration is delivering a significant number of new homes, including buildings of scale.</p> <p>Whilst two locally designated views pass over the area, the LSIS is not sensitive from a heritage perspective: there are no listed buildings within, or within close proximity; whilst inter-visibility with the nearest conservation area to the north-west (Camden Square) is limited. Conversely, as a whole, Islington is a borough rich in heritage: there are some 41 conservation areas, covering over half of the borough's land area, and over 4,500 statutorily listed buildings, which limit the overall development potential of the borough.</p>	

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		<p>A key theme of planning policy at all levels is securing more sustainable patterns of development. The NPPF makes it clear that planning policies and decisions should promote an effective use of land (paragraph 117), whilst optimising development outputs is an overarching theme of the “good growth” policies in the Mayor’s draft London Plan.</p> <p>Draft Policy SP3 (Part E) of the Local Plan states that building heights within the LSIS should not exceed five storeys. The purported written justification at paragraph 2.33 states that a detailed urban design and character assessment for the area concluded that a maximum building height of around 20 metres is appropriate for the LSIS in terms of “responding sensitively to the area’s historic setting and heritage assets”.</p> <p>It is understood that this restriction purports to rely upon the ‘Vale Royal / Brewery Road Locally Significant Industrial Site Height Study’ (“the LSIS Height Study”), which was undertaken by Urban Initiatives Studio on behalf of the local planning authority and published in December 2016. However, no meaningful information is provided as to the scope (and brief) of the LSIS Height Study and, more significantly, its conclusions have not been subject to proper consultation. Specifically, as noted above, a significant number of local stakeholders responded to the local planning authority’s LSIS consultation in March 2017 (which included the LSIS Height Study), but despite the authority stating that there would be further engagement in advance of any policy formulation, this has failed to take place.</p> <p>The conclusions of the LSIS Height Study are flawed and no material weight should be attached to them. In particular, the LSIS Height Study does not appear to have had the benefit of any expert heritage input and is based upon a fundamental misunderstanding of the area both in terms of its townscape character and economic function. It is unsurprising, therefore, that it has resulted in an inappropriate and wholly unjustified height restriction in the draft Local Plan policies for the area.</p> <p>Despite identifying that the LSIS is not sensitive from a townscape perspective (figure 1.7), the LSIS Height Study asserts that the area has a townscape character of merit which should be preserved. In reality, the character of the LSIS has been largely driven by the functional requirements of the commercial activities located there: its overarching character is utilitarian and to purport otherwise is entirely unjustified.</p> <p>Following on from this misguided characterisation of townscape, the LSIS Height Study seeks to assert that the sort of accommodation needed to serve businesses currently located in, or wishing to locate to, the area “can best be achieved with compact development up to five storeys in height (20m)” (paragraph 3.1 (1)). Such a conclusion is unsubstantiated and unjustified, and fails to have any proper regard to the townscape of the area, and the businesses located, or wishing to locate, there.</p> <p>Conversely, CPP has a unique and unrivalled understanding of the accommodation needs of the creative cluster and is well-placed to work with the local planning authority, and other stakeholders, to develop an</p>	

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		<p>appropriate vision for the area which maximises economic benefits at the same time as delivering physical and environmental improvements. Given its lack of townscape sensitivity (especially when compared to the wider Borough), this is entirely the sort of area that can accommodate the sort of 'transformational change' envisaged in the draft London Plan to meet London's accommodation needs in a sustainable way, and underpinned by the successful economic base that already exists and wants to grow. Instead, the local planning authority seeks to introduce an arbitrary five storey (20 metre) height limit on development in the LSIS, which fails properly to understand occupiers' needs, and over-states the existing townscape quality. This approach is entirely unjustified and palpably unsound. It would severely restrict the ability of the area to contribute to the economic well-being of the Borough and represent a lost opportunity to secure more sustainable use of land, contrary to both the NPPF and the emerging London Plan.</p> <p>CPP append short paper by Peter Brett Associates which provides an analysis of the local planning authority's draft policies and the Local Plan evidence base; commentary on the London Plan policy and evidence base; and reference to other reports and other borough policy.</p>	
Policy SP4: Angel and Upper Street	Statutory consultees, a landowner, local transport and business groups and a local resident.	<p>TfL request several amendments related to Crossrail 2; and to reference improving bus journey time and bus priority. Policy should acknowledge opportunity to unlock development capacity in Angel through improved connectivity and capacity brought by Crossrail 2.</p> <p>Canal and River Trust suggest reference should be made to protect the structural integrity and heritage value of Islington Tunnel. Positive that site allocations include reference to the tunnel but windfall development may have adverse impacts.</p> <p>Local group comment that cyclist permeability improvements are not identified. Opportunities for 2 way cycling at Charlton PI, Tolpuddle St/Liverpool Rd, Duncan St/Islington High St. The plan should aim for safe cycle infrastructure through Angel. Paragraph 2.43. should explicitly plan to improve cycling permeability between Culpeper Park and Chapel Market.</p> <p>Landowner of Sainsbury's site (AUS6) provides on the Sainsbury's site. Respondent considers the site represents an excellent opportunity for Islington Council and Angel Town Centre to improve vitality and viability. It represents an excellent opportunity to achieve enhanced permeability, enhanced economic activity, new homes and a substantial improvement to the urban realm. Improved place-making along Tolpuddle Street can be achieved through active and animated road frontages and an appropriate sense of place. They object to Part B as it does not include residential uses and also considers that approach is overly restrictive given capacity improvements expected with Crossrail2. Stating business use is a priority in Angel and on upper floors in rest of the area is ambiguous as to where this is referring to.</p>	<p>TfL requested amendment re: buses will be made but Fig 2.5 references to Crossrail 2 will be removed and replaced with reference to specific site allocations which provide further detail about Crossrail 2.</p> <p>In Islington, the main benefit of Crossrail 2 is the increase in transport capacity. It will not enable any significant further development capacity, certainly over and above what could be delivered now notwithstanding the constraints evident in Angel town centre, e.g. heritage, building heights.</p> <p>Council will amend policy to add further protection for Islington Tunnel.</p> <p>Local Plan supports active travel modes. No need to identify every potential scheme when there is broad policy support. The allocation for site AUS6 states that any development on the Sainsbury's Site must maintain/Increase permeability between White Conduit St and Tolpuddle Street.</p> <p>Site AUS6 and the wider SS area is considered appropriate for prioritisation of business floorspace. Crossrail 2 does not have an agreed business case and is not funded so it is inappropriate to rely on any potential improvements related to this. 'Rest of area' refers to spatial strategy area outside town centre including LSA.</p> <p>Policy protects A1 but the council cannot distinguish between types of A1.</p>

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		<p>A resident would like to see it expressly stated the area is an important area for unprocessed food retail in low-mid price bracket and should be protected.</p> <p>GLA comment that promotion of retail, office, cultural uses in town centre reflects Draft London Plan.</p>	
Policy SP5: Nag's Head and Holloway	Range of residents commented as well as Islington based groups, a landowner and TfL	<p>Objections to the quantity of potential tall building sites proposed. Comment from resident that these will impact on tranquillity and conservation area. Capacity of proposed new development was also questioned and concerns that an additional 7000 people will impact local area/infrastructure.</p> <p>TfL note there are no current projects to remove the Nag's Head gyratory. Also concerned that wider street planting may not be suitable for Seven Sisters Road due to engineering and pedestrian space concerns.</p> <p>A local group support the Hornsey Road to Sussex Way link and want to see bi directional cycling provision on Seven Sisters Road. The plan should implement protected cycling infrastructure north to south along the A1 and Hornsey Road. Another Islington group want to reduce vehicular traffic on Holloway road to reduce number of lanes.</p> <p>Another group generally supportive of SP5 although retention of retail may be challenging with loss of Marks and Spencer's. Support for Morrison's supermarket site which should include green space.</p> <p>London Metropolitan University supports the policy. However, policy relating to student accommodation is not supported and comments should be read in conjunction with university campus site allocations and policies H1 and H6.</p> <p>Local group state that Nag's Head gyratory removal should be high priority. Request reinstatement of two-way road. This should be a development consideration for each site and this would benefit the surrounding site allocations.</p>	<p>The council approach to tall buildings has been detailed by detailed evidence. Identified sites are suitable in principle but any application must meet criteria in policy DH3, which includes a number of considerations including assessment of amenity impacts. Capacity figures will be provided in next plan iteration. Capacity identified by respondent greatly exceeds council's estimates for the spatial strategy area.</p> <p>Status of gyratory project noted but long term aspiration will remain. In relation to request to include reference to gyratory removal in development considerations, council consider this is not appropriate.</p> <p>Street planting would work inter alia with policies protecting street legibility.</p> <p>Amendments re: cycling improvements not necessary as Local Plan policies offer sufficient support already.</p>
Policy SP6: Finsbury Park	A mixture of residents, statutory consultees, businesses and local groups.	<p>General support from a variety of respondents including residents, business and statutory consultees. Specifically, support was expressed for Parts G, H, I, and M; promotion of a street market; paragraphs 2.74, 2.75; step free access to the station. A number of minor amends to policy suggested, and request for cross borough working to be made more explicit</p> <p>TfL question claim re: busiest transport interchange, and note that complete station redevelopment is not realistic. However, several residents would like to see full station improvements and a local group want full consultation to take place on any works.</p> <p>Support expressed by local group and residents for approach to retail and residential on upper floors. Request to amend wording to be more</p>	<p>Several amendments to be made in response to suggestions. The Council will ensure that cross-boundary impacts are mentioned where relevant.</p> <p>Amendment made to clarify busiest interchange statement. Station redevelopment largely relates to existing improvements but is a general point which would relate to any future changes which come forward within the plan period. Detailed consultation will take place before any major works were approved.</p> <p>Amendment will be made re: Fonthill Road PSA.</p> <p>The councils approach to tall buildings is in line with the draft London Plan. Tall building sites are only acceptable in principle and will need to conform with a range of policies including design and affordable housing</p>

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		<p>accurate relating to Fonthill Road and relationship with Primary Shopping Area.</p> <p>A variety of residents have concerns about tall buildings including the impacts on character and poor architecture; affordable housing contributions and the need to prevent wind tunnels.</p> <p>A landowner feels policy is too restrictive by solely requesting commercial and retail uses on the ground floor (Part B) with residential only on upper floors; policy should allow flexibility considering characteristics and viability. Plans must be based on evidence and should allow for conventional and non-conventional housing development. Respondent disagrees Finsbury Park has potential to develop as a CAZ satellite location because it is not already established as so.</p>	<p>requirements. The impact of wind tunnels has been considered and the supporting text references policy DH3 that addresses these impacts.</p> <p>Town centres are inherently commercial areas and non-commercial uses at ground floor level will harm the function of them. Ground floor residential also raises issues with amenity. The plan is based on detailed evidence which highlights the need for office development as well as housing. The GLAs response is supportive of the councils approach. Due to hyper connectivity local evidence demonstrates Finsbury Park is appropriate as a satellite CAZ location that would support the CAZ in the future.</p>
Policy SP7: Archway	Statutory consultees, landowner and local groups	<p>TfL express support for improvements to Archway station but that this would have to be done using funding from third party sources.</p> <p>A local group state that development appears to have stagnated, in part because a fall in house prices. Policy should be framed to allow for such changes in circumstance.</p> <p>Another local group note that Junction Road needs improved crossings.</p> <p>Landowner is generally supportive but disagrees with the tall building approach. Instead it is proposed that an area of potential tall buildings is used deploying the cluster principle, instead of specific sites.</p> <p>GLA support the reference to the 'more than locally significant' night time economy classification.</p>	<p>The local plan covers 15 years and the planning system allows for material considerations on a case by case basis to reflect changes in development and economic trends. Plans also must be reviewed every 5 years.</p> <p>TfL operate Junction Road which limits scope to affect such specific additional crossings. Local Plan policy supports crossings and improvements to support walking and cycling.</p> <p>The councils approach to tall buildings is informed by detailed evidence and is in line with the draft London Plan.</p>
Policy SP8: Highbury Corner and Lower Holloway	Statutory consultees, a landowner and a range of local groups.	<p>TfL comment opportunities to redevelop Highbury and Islington station could possibly be a long term ambition but this has been explored several times by network rail (owners) who highlight poor commercial viability. There should also be reference to the creation of a new station entrance on east side of Holloway Road, which would provide step free access. This is mentioned under HC1.</p> <p>Most respondents were supportive of redevelopment of Highbury and Islington station, with varying views on whether to deck over the platforms for cyclists, intensification of above station development and whether any works would cause severe travel disruption.</p> <p>Comments made about current disruption due to work being undertaken at Highbury Corner.</p> <p>Theatres Trust and GLA express support for the acknowledgement of the importance of cultural venues, specific examples and the recognition of the area as a cultural destination. Garage music venue should be protected.</p> <p>Landowner supports vision for the area.</p>	<p>The council does not believe the policy overstates likelihood of redevelopment, it states there may be an opportunity. Amendment will be made and cross reference made to site allocation in supporting text.</p> <p>The Garage music venue is protected through Part E.</p>

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Policy H1: Thriving communities	A range of comments from statutory consultees, business, residents, local groups and landowners.	<p>GLA are supportive of the 50% affordable housing target and the approach to affordable housing contributions and should follow guidance in policies H2 and H6 and paragraphs 4.5.7 to 4.5.9 of draft London Plan</p> <p>Sport England express support for Part S of the policy and paragraph 3.19 which acknowledge increased housing will increase demand for sporting provision. An evidence base is needed that may include a Sports Facilities Strategy, Playing Pitch Strategy.</p> <p>TfL supportive of high quality homes objectives but would like to see acknowledgement of the development capacity potential brought by Crossrail2 at Angel which would fit well in H1 Part C. The policy should acknowledge that development should be optimised in close proximity to transport nodes.</p> <p>Support for proposal to exceed housing target, affordable housing target, student housing and PRS approach. Other respondents support the general approach of H1 but believe all forms of tenure housing should be explored and PRS should not be resisted and can be complimentary to the councils own housebuilding efforts. A landowner requests better acknowledgement of Build to Rent and HMO sectors in addressing housing crisis. The conditions put on large-scale HMO development to make the best use of land are in conflict with the market's ability to provide the best use of land.</p> <p>Canal and River Trust note needs of houseboat dwellers, citing Housing and Planning Act and London Moorings Strategy.</p> <p>Concerns over dwelling space and density raised by local group. Resident requests change to Part C to explicitly refuse gated communities, and comments on approach to specialist housing re: supply and design.</p> <p>Resident respondent comments that cross borough consultation should not be just limited to Gypsy and Traveller accommodation. Mandatory consultation with neighbouring boroughs should be the norm.</p> <p>Resident suggests requirements for high density housing should be balanced with good design and provision of relevant facilities. In particular, a requirement for adequate cycle storage for all dwelling sizes should be included or provide funding for on street cycle parking.</p> <p>A local group recommend a clause should be added along the lines of 'the council will take action to prevent leaving residential premises vacant (buy to leave)'.</p> <p>Another group want to see policies enable car parks and garages to be replaced by housing or public space except for the disabled.</p>	<p>Support for approach noted. The council will continue to collect small sites contributions on commencement rather than occupation although paragraph 3.57 sets out potential for different payment structures.</p> <p>Support for Part S is noted and an update to the Sports Facilities evidence base will be published alongside Regulation 19 consultation which will address paragraph 96 of NPPF.</p> <p>In Islington, the main benefit of Crossrail 2 is the increase in transport capacity. It will not enable any significant further development capacity, certainly over and above what could be delivered now notwithstanding the constraints evident in Angel town centre, e.g. heritage, building heights. The plan supports development close to transport nodes through objectives, variety of policies and the spatial strategies.</p> <p>Changes will be made to policy H11 (and consequentially H1) to provide clarity on council's approach to PRS, but will still have strong requirements which any proposal will need to meet including genuinely affordable housing. Build to rent will not have a significant role in meeting Islington housing demand. Largescale HMO's will also not address Islington's housing need.</p> <p>The Council is undertaking a needs assessment that covers s123 of the Act. Outcomes will be discussed with the Trust.</p> <p>Policy H4 requires all dwellings to be of high quality, including space standards. Current wording is sufficient to resist gated communities. The councils approach to older persons housing will ensure that vulnerable needs are met through specific affordable specialist accommodation (affordable extra care) and - mostly - through conventional housing designed to meet a range of needs.</p> <p>There are specific issues with gypsy and traveller forms of housing that requires fine grain cooperation. On housing generally, most assessment is done at a regional level. The Council will ensure that cross-boundary impacts are mentioned where relevant.</p> <p>Local Plan has strong design policies which would apply re: optimisation of housing in policy H2.</p> <p>Buy to leave is covered sufficiently by policy H2.</p> <p>The local plan cannot remove existing car parks and garages but would support redevelopment of car parks where this is brought forward. Car parking will not be permitted as part of new development, except wheelchair accessible parking.</p>

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Policy H2: New and existing conventional housing	Statutory consultees, landowners, several local groups and a resident. Comments also received from Camden and Islington Public Health.	<p>The GLA express support for the commitment to meet and exceed the housing target, the proposed dwelling size mix and for the buy to leave policy. They also highlighted that protection of units of up to 125sqm from subdivision may impact delivery of small sites.</p> <p>DfE notes the proposed scale of housing growth and highlights need to consider impact on education facilities.</p> <p>A local housing association request amendments be made to allow for circumstances where substandard accommodation can be reconfigured/replaced in line with paragraph 3.28 principles even if this results in net loss of more than 1 unit. Additionally, comment was made that development of 20+ dwellings that are regulated by social landlords should not have to enter into a planning obligation to require the dwellings to be occupied as a dwelling house.</p> <p>The housing association also requested clarity on Part F re: the circumstances where studios/bedsits would be permissible.</p> <p>Camden and Islington Public Health suggested that policy H2D should specifically state that all new and converted conventional residential development should meet the housing tenure priorities in Table 3.2 in addition to house size.</p> <p>Resident supports policy H2 but asks if development in other boroughs would be taken into account in considering what are 'specific exceptional circumstances' for part F of the policy.</p> <p>Local community group note support for policy.</p> <p>Landowner of site AUS6 considers that removing residential from AUS6 as a land use would conflict with the Council's policy to exceed its own minimum housing target in policy H2. It remains unclear whether the Council is able to meet its 5 year and 6-10 year housing target.</p> <p>Another landowner supports aim to exceed targets and the optimisation of sites, but considers that non-conventional housing should play a part in delivery. They also request that Table 3.2 be understood as an aspiration, which should be treated flexibly on a case by case basis so long as market evidence justifies a departure from the preferred housing mix and scheme deliverability/viability to allow for this departure; and that Part F is relaxed to allow studios/bedsits where market evidence dictates this is what the market wants, regardless of whether the "exceptional circumstances" apply; Studio or bedsit accommodation should be considered as part of helping to tackle the housing problem.</p>	<p>Support for elements of H2 welcome. With regard to the 125sqm limit on sub-division, the council considers that the 125sqm restriction provides an important balance between encouraging new residential and protecting larger units which meet an evident need in the borough.</p> <p>The Local Plan will be supported by sufficient evidence including an update of the Infrastructure Development Plan.</p> <p>Policy will be clarified to allow in exceptional circumstances to lose more than one affordable dwelling as long as there is no net loss of floor space and policy H4 is adhered to. Amendment to supporting text to clarify occupied planning obligations will only apply to all market homes as affordable housing will be bound by other restrictions. Part F will be clarified to make policy clearer.</p> <p>Policy H3 Part H covers tenure split requirement, hence change is unnecessary.</p> <p>With regard to cross borough considerations on provision of studio/bedsit units however, it is not considered that there would be any relevant cross-boundary impacts to consider.</p> <p>Site AUS6 is in a commercial area with an existing retail use. While housing might be acceptable in principle, the council considers that this site is much more suited to commercial floor space, namely office and retail. The site is not needed to meet and exceed projected housing targets; an updated AMR demonstrating this will be published prior to the next iteration of the Local Plan.</p> <p>The Local Plan sets out policies to assess a range of specialist forms of housing; however, the council note that conventional residential accommodation is the primary means to meeting housing targets.</p> <p>Housing mix sought is based on local evidence. H2 moves away from a prescriptive percentage mix in current policy, hence there is a degree of flexibility in its application, while ensuring that certain sizes are prioritised.</p> <p>An approach to studios/bedsits (or indeed any policy) which was based on what the market wants would fundamentally undermine the planning system. It is a nonsensical suggestion. Studios and bedsit units are not the most sustainable form of accommodation as they cannot meet a broad range of needs, e.g. families. However, the policy does allow for them where justified.</p>
Policy H3: Genuinely affordable housing	Statutory consultees, landowners, residents and local group. Comments also received from Camden and Islington Public Health.	<p>The GLA, a resident and local group express their support for the policy.</p> <p>GLA supportive of percentage requirement, approach to considering viability, and the tenure split</p> <p>TfL as a landowner support Policy H3 and state their commitment to delivering 50% affordable housing by habitable rooms with their</p>	<p>Support is noted.</p> <p>LBI's approach is in conformity with the London Plan. High land values and a scarcity of land mean every opportunity to deliver on site affordable housing must be taken.</p>

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		<p>significant land holdings in Islington. The other landowners generally disapprove of the affordable housing requirement and would like the 50% affordable housing requirement to be aspirational and for the London Plan's 35% target to be used.</p> <p>Further comments from landowners note issue with the non-acceptance of site specific viability, which is considered contrary to the NPPF and London Plan. Some flexibility should be given on the tenure split to allow more intermediate provision. In relation to schemes delivering less than 10 residential units/ below 1000sqm GIA, a lower sum should be applied if viability remains an issue.</p> <p>The Metropolitan Police note that policy H3 does not support the portfolio approach to affordable housing provision on public sector land. This approach originates from the draft London Plan and Affordable Housing SPG.</p> <p>The Camden and Islington Public Health Team request more clarity in what the council considers to be genuinely affordable.</p>	<p>Islington's need for affordable housing is significant. It is necessary to impose strong measures to ensure the policy is delivered, namely by refusing schemes proposing less than 45% and not allowing case by case viability, except in exceptional circumstances. This approach is consistent with the NPPF, NPPG and draft London Plan, and is demonstrably viable as shown in the Local Plan viability study. The tenure split reflects evidenced need and affordability, hence the priority for social rent, and is shown to be viable by up to date evidence.</p> <p>Resisting site specific viability accords with PPG. The GLA have noted support for the proposed policy.</p> <p>Policy H3 allow for site specific viability re: small sites AH contribution.</p> <p>The council do not agree with the portfolio approach as it could undermine AH delivery in Islington.</p> <p>The council acknowledges lack of definition of genuinely affordable housing; this will be provided in the next plan iteration.</p>
Policy H4: Delivering high quality housing	GLA, Landowner, local business, local groups and residents.	<p>The GLA, a local group and a resident all express support for the policy.</p> <p>Landowner and local business comments the plan should recognise that whilst developers should strive to deliver the best quality accommodation, there should be flexibility in a range of standards given national policy changes, e.g. floor to ceiling heights and minimum distance to car parking due to legacy design restraints.</p> <p>Local business comment that whilst tenure blind design is supported there are circumstances where the most appropriate and pleasant cores may not be on the main frontage.</p> <p>The local business requests reference be made in Part G regarding the positioning of private amenity space and impact on adjacent homes due to a greater number of deliveries, servicing needs of a larger number of homes within an existing building envelope.</p> <p>A resident requests requirement for the storage of waste should ensure that there is provision for storage consistent in size and design with the timing of waste collection.</p> <p>Another resident states that design measures identified such as dual aspect, natural ventilation, appropriate acoustics and air quality requirements can't be incorporated for some of the identified allocated sites so some compromise will be required, which is not acceptable. Resident also notes that Policy H4 I should also establish a hierarchy which prioritises the avoidance of overheating over the requirement for daylight and sunlight.</p>	<p>It is vital all new housing is of high quality. The council disagrees with proposed amendments as this could seriously undermine policy H4.</p> <p>Every home must be of high quality given the lack of development opportunities and the need for adaptable homes to cater for a range of needs. Although Lifetime Homes cannot be imposed as a uniform standard, there are elements of the standard that can still be sought. Part D requirements for a through floor lift is in line with Part M of the BR. In respect of tenure blind, Part F will be amended to clarify that there may be exceptions where locations away from the main frontage would improve residential amenity.</p> <p>Policy H5 Part A covers positioning of private open space. Impact on refuse storage and collection is covered by criterion C. Reference will be added to Part G of Policy H4 to require consideration of impacts on existing delivery and servicing.</p> <p>The policy requires provision of acceptable waste storage facilities but waste collection processes are not a planning matter.</p> <p>While all policies will be robustly implemented, provisions of S38(6) mean it cannot be guaranteed all policies will be fully implemented on every</p>

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			scheme. Re: daylight and sunlight assessment and cooling hierarchy, policy S6 would apply in conjunction with H4.
Policy H5: Private outdoor space	A local group, business and two residents commented.	<p>A resident and local group both support this policy; resident would like to see stronger wording in paragraph 3.92</p> <p>In relation to Part D a business comments that the requirement for maximising external private amenity space for ground floor homes is difficult to achieve in addition to high quality shared amenity space at higher density. Policy should be reviewed, particularly the additional 5sqm per additional person.</p> <p>A resident requests that Part E be amended to provide a usable balcony depth of 2m not 1.5m.</p>	<p>Support is noted. The wording is deemed to provide sufficient emphasis while having necessary flexibility.</p> <p>The policy prioritises private space over shared space, thus any impact of the former on the latter is not of concern. Focus on provision of private outdoor space is essential given the dearth of open space.</p> <p>Council considers 1.5m depth is appropriate; no rationale set out for why 1.5m is inappropriate.</p>
Policy H6: Purpose-built Student Accommodation	Residents, landowners, developers and a local group.	<p>Local group and a resident agree with approach to restricting student accommodation, in light of previously high student housing delivery.</p> <p>Another resident suggests more information is needed regarding the provision of bursaries.</p> <p>A landowner is fully supportive of the provision of affordable student accommodation, however, would seek to ensure that the level of affordable accommodation is agreed only on a 38-week period and in line with the London Plan (2017) definition of affordable.</p> <p>Another landowner does not object to an approach whereby student accommodation is only permitted on allocated sites, provided their own site is allocated for student accommodation. If this is not the case, they object. The Council should be sure that it fully understands the needs of its local HE providers before allocating sites in order to ensure that the sites allocated will actually meet their needs</p> <p>Landowner also considers that additional flexibility needs to be built in to this draft policy to allow some discretion between prioritising bursaries or affordable accommodation. In both cases the contributions/affordable accommodation need to be subject to viability.</p> <p>Landowner also considers short term letting of student accommodation as visitor accommodation acceptable and can provide extra funding for the university and amenity issues can be dealt through management plans. If policy is not relaxed, then it should be made clear that the prohibited “general visitor accommodation” does not include letting to other academic institutions during holiday periods for example language schools, or other residential educational courses.</p> <p>A further landowner considers the policy to be contrary to the adopted and draft London Plan. PBSA should be allowed on suitable sites including allocated housing sites. Furthermore, requirement for 10% of bed spaces to be wheelchair accessible is too onerous and exceeds 5% Building Regulations, and evidence of use of wheelchair accessible</p>	<p>Support is noted.</p> <p>It is not clear how much more detail could be provided. The wording reflects the current Core Strategy and SPD, and clearly demonstrates the method for calculating contribution and information on what it will be spent on.</p> <p>Broad support noted. We will clarify that provision of affordable student accommodation should be in line with policy H17 of the draft London Plan.</p> <p>The council must consider a broader range of issues when exercising its plan-making functions. PBSA provides accommodation for a narrow subsection of the population, and therefore is not conducive to meeting a range of needs into the future. It does not constitute the best use of land, and therefore the council has limited suitable locations to ensure that where sites do come forward, they better address priority needs.</p> <p>The bursaries and affordable student accommodation requirements have been tested through the Local Plan viability study.</p> <p>The council consider that clarification regarding H6 is necessary, as we do not object to ancillary uses as identified by the London Plan; it is use as stand-alone general visitor accommodation that we want resist.</p> <p>PBSA restrictions considered appropriate given past delivery and significant competing development pressure. LBI consider demand for accessible student housing has been unmet and this requirement demonstrates a shift towards inclusivity and futureproofs provision.</p> <p>Bursary contributions are a requirement of current policy and was deemed by the Planning Inspector to be a valid tool in contributing to LBIs fairness agenda. The bursaries and affordable student accommodation requirements have been tested through the Local Plan viability study. Policy aligns with draft London Plan re: affordable student accommodation.</p> <p>Restricting use of PBSA as visitor accommodation due to impacts on housing supply and safety/security issues. Clarification will be made</p>

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		<p>rooms at other student accommodation developments. Effect of this policy would be a reduction in number of rooms.</p> <p>Landowner argues there is no planning reason to seek bursary provision as part of new PBSA, and object to student accommodation not be allowed to be used as visitor accommodation. They also consider there is no evidence that 35% affordable student accommodation can be secured across London.</p>	<p>however to note that ancillary uses of student accommodation for summer schools etc. is permissible.</p>
Policy H7: Meeting the needs of vulnerable older people	Resident, GLA	<p>There should be no need for Islington to require 'exceptional circumstances' for its support of care accommodation. The term 'appropriate should replace 'exceptional'.</p> <p>GLA note the policy comprehensively follows the guidance in Policy H15 of the draft London Plan but should reflect the annual borough benchmark for specialist older persons housing in table 4.4.</p>	<p>The current wording reflects the policy approach to meet need through conventional residential accommodation.</p> <p>The GLA's comment is contradictory as it considers the meeting of the housing needs of older people through adaptable conventional housing to be comprehensive in the context of the London Plan, but also requests that that the policy reflects the benchmark for specialist older persons' accommodation. The council intends to retain the current approach which accords with the overarching priorities and objectives of the Local Plan.</p>
Policy H8: Self-build and Custom Housebuilding	No comments received	N/A	N/A
Policy H9: Supported Housing	Resident	It should be made clear that off-site replacement accommodation is provided in Islington.	Need for such accommodation may be wider than Islington, therefore the policy should not restrict on the basis of borough boundary.
Policy H10: Houses in Multiple Occupation (HMOs)	Landowner	<p>Landowner suggests change to small-scale HMO policy to allow loss of larger family housing if replacement meets need or widens housing choice.</p> <p>Objects to restrictions on large-scale HMOs and suggests that the market should dictate what type of housing is brought forward, informed by scheme viability as well as an appreciation of wider Londoners needs.</p> <p>Landowner considers TCs are suitable for large-scale HMOs, in line with current policy DM4.4. Agrees with requirement to meet Policy H4 but disagrees with Policy H2 which requires sites be first considered for self-contained housing. Again, they reiterate that the market should dictate what is provided. Agree with AH requirement in principle but suggest flexibility on tenure.</p>	<p>The council considers it necessary to protect larger dwellings which may be more susceptible to small-scale HMO conversion.</p> <p>Large scale HMO's do not have a meaningful role in meeting Islington's housing need and would be liable to undermine affordable housing provision. It would be wholly inappropriate to allow the market to dictate any development in the borough as this would not meet the needs of the population as a whole.</p> <p>Part C provides broad criteria to assess suitability of large-scale HMOs; this is considered sufficient to assess any applications, and a locational element such as specifying suitability in TCs is not necessary.</p> <p>Although it is irrelevant for the purposes of the draft policy, we note that the respondent has incorrectly interpreted existing policy DM4.4. The policy promotes a range of uses including SG main town centre uses. A large-scale HMO does not fall within the definition of a main town centre use, either in the DMP policy, supporting text or glossary, or the NPPF (2012, 2018 or current published 2019 version); in fact, no residential use falls within the definition.</p>
Policy H11: Purpose Built Private Rented Sector development	Landowners, business and statutory consultee	<p>A landowner states that restricting tenure of market housing is not consistent with national and regional policy and requests the term 'conventional housing' be defined and it prioritisation is not based on sound evidence. Part A should be deleted so PRS is not prejudiced and Part B amended relating to covenant length, suitable AH tenures, longer tenancies, clawback process.</p> <p>Local business expresses their support for the policy.</p>	<p>Policy H11 does not aim to restrict new housing being rented privately but prevents the PRS model undermining affordable housing requirements. The policy is considered clear but further clarity will be provided. Part A will be amended but strong criteria will be retained to assess PRS schemes.</p> <p>On point B(i), cluster flats are not self-contained, hence it would be illogical to include within the definition of self-contained. Purpose built PRS is self-contained product, as specified in the London Plan. Any proposal involving cluster flats would be classed as a large-scale HMO and trigger policy H10.</p>

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		<p>TfL Commercial Development comment that the policy is inconsistent with London Plan policy H13 which evidences support for the growth of PRS and build to rent.</p> <p>A developer makes several comments. They disagree with Part A and consider that PRS should be allowed to widen market choice. Part B(i) should allow cluster flats as part of self-contained units. Part B(ii) should have more flexibility to allow of affordable private rent. Part B(iv) should specify that the covenant is dealt with through a condition. Part B(v) should refer to viability in relation to the clawback mechanism. Part B(vi) should allow for some flexibility re: management and delivery of PRS. Part B(vii) should recognise the need for shorter/flexible tenancies; and allowable fees should refer to industry standards.</p> <p>The GLA comment that Islington should take a more positive approach towards build to rent, recognising the role it can play in delivering housing need while applying appropriate requirements to ensure that high quality build to rent developments are able to come forward.</p>	<p>On point B(ii), the council's priority is for genuinely affordable housing. Amendments to the policy will clarify issue about delivery of SR. We note the amendment to the draft London Plan which allows boroughs to require social rent as part of Development Plan policy.</p> <p>On point B(iv), the covenant would not preclude future planning applications for different use. A planning condition would not provide the necessary safeguards/guarantees.</p> <p>On point B(v), the draft London Plan is of relevance. The minor suggested changes version makes it clear that the clawback mechanism should provide no financial incentive to break the covenant, which warrants a strong approach.</p> <p>On points B(vi) and (vii), the policy is consistent with the draft London Plan.</p> <p>In response to the GLA comments, amends will be made to Part A but the council does not consider that purpose built PRS has a significant role in meeting housing need.</p>
Policy H12: Gypsy and Traveller Accommodation	Local resident and statutory consultee	<p>Local resident requests an addition to the policy making clear Islington applies the London Plan definition when assessing accommodation needs.</p> <p>GLA welcome the recognition of London Plan definition. In the absence of a recent needs assessment Islington would have to apply London Plan mid-point figure for 2 gypsy and traveller pitches as set out in table 4.4A. A criteria based policy approach is unlikely to provide adequate provision and site allocations should identify sites as well as securing funding for pitches by cooperating with neighbouring boroughs.</p>	<p>The council recognises the London Plan definition but the NPPF definition remains a consideration to be addressed.</p> <p>The boroughs context and the competing development needs make it difficult to cater for any need for pitches which is identified. However, the council are committed to meeting need arising from an updated assessment and will amend the policy to reflect this. The GLAs comment about identifying capacity on a multi-borough basis is noted, and we will discuss this with adjacent boroughs as part of the D2C process and preparation of SoCGs.</p>
Policy SC1: Social and Community Infrastructure	Landowners, local resident, and statutory consultees; Camden and Islington Public Health	<p>Two landowners request reference to 'further educational institutions' to allow loss of further educational institutions through rationalisation programmes.</p> <p>Sport England claim Policy SC1 is not based on up to date or robust evidence therefore being contrary to NPPF paragraph 96 requirements. The Council should develop a Playing Pitch Strategy and Built Sport Facility Strategy and include Sport England in their development of these. Also note that one policy relating to all forms of social and community infrastructure does not take into consideration the various nuances of each provision. There should also be a range of policies to address the nuances of different social and community infrastructure.</p> <p>Sport England are in support of Part B and Part F but recommend paragraph 3.153 directs applicants to Sport England guidance.</p> <p>Sport England expressed concern that Part G(v) could be interpreted to prevent sport facilities in particular locations unless they fall within the character of an area which is arguably next to another sports facility but not where it is demanded.</p>	<p>Supporting text will be amended to add reference to higher education institutions as suitable bodies re: justifying loss through rationalisation.</p> <p>LBI has undertaken an update to the Sports Facilities evidence base and will publish this alongside the Regulation 19 consultation, following consultation with Sport England. Commissioned consultants have consulted Sport England as part of this evidence update, which includes the approach to playing pitches of which there are very few in Islington. A single policy is considered sufficient to assess the full variety of SI. Some minor amendments may be necessary in line with Sport England comments.</p> <p>Paragraph 3.153 already specifically relates to guidance published by Sport England.</p> <p>Complementing character does not mean replicating exactly what is already within a location. It is not possible to second guess policy interpretation for each and every future case but the council do not consider that assessment against character poses any in principle difficulties in terms of providing new sports facilities, even in areas with no existing facilities.</p>

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		<p>Sport England is also concerned with the requirements in policy SC1 and paragraph 3.146 to submit community need assessments with proposals. Sport facility assessments and strategies should be borough wide Council led that should take into consideration more than what is stated in paragraph 3.147</p> <p>Sport England consider Part D(i) to be too weak by requiring replacement facilities to be 'at least equal' which is misleading and contrary to the NPPF and may not meet current needs. Part D(ii) is contrary to the NPPF and sports facilities should only be lost if surplus to requirement. Part D can only be robust with an up to date evidence base. Similar issue raised re: Part E.</p> <p>DfE welcomes the policy but suggest the plan highlight the need for phased delivery of new housing and supporting infrastructure to ensure the latter is delivered when required to meet need. Local Plan should reference key national policies re: school place planning.</p> <p>DfE request they are added to LBI's list of relevant organisations to engage with the preparation of the plan in relation to meeting primary and secondary school demand, and for future CIL consultations. LBI should also consider utilising a separate DPD for schools or a similar systematic approach as LB Ealing have done to provide useful evidence for new schools and allocate sites for new schools to meet demand. An evidence base should explain how forecast housing growth is translated into an identified school places and new schools demand.</p> <p>DfE request to be included in the database for future CIL consultations. It is claimed to be unclear if sufficient CIL funding will be available to fund educational infrastructure to support growth, alongside the other demands of CIL.</p> <p>DfE recommends LBI cover cross borough boundary school student movement in relevant Statements of Common Ground (SOCG).</p> <p>The Metropolitan Police Service comment that, until CIL is collected for police infrastructure to respond to growth, funding should be collected through S106 contributions to ensure there is sufficient funding.</p> <p>Camden and Islington Public Health request that where developers include proposals for new, relocated, or loss of primary or secondary health care premises, the Local Plan should require the developer to show evidence of engagement with relevant bodies. They also state that Paragraph 3.144 should include reference to post-16 education and childcare facilities; and that the Local Plan should directly reference the North London Partners Strategic Estates Strategy and the Haringey and Islington Wellbeing Partnership's strategic estates strategy.</p> <p>Landowner request clarification in Policy SC1 that the need to justify the loss of the educational use will not be required on sites where the council has, elsewhere in the plan, allocated land for alternative uses.</p>	<p>The intention of this aspect of the policy is to enable developers to justify changes to provision to the council, in addition to marketing evidence. The Community Needs Assessment is considered a form of social evidence which supports the redevelopment of community facility for another use. The approach could be used for renovations of a sport facility to redevelop to meet different sporting needs in response to peoples changing needs. The Local Plan is underpinned by strategic evidence including the sports facilities study, therefore consideration of borough wide needs is implicit in the policy. However, the Council considers that it may be appropriate to add additional supporting text which makes clear that where wider borough level assessments are available, for instance the update to its Sports Facilities evidence base would be relevant, they will also be utilised as part of the decision making process.</p> <p>The council has produced updated evidence regarding status of facilities as noted previously. The council will amend Parts D and E to provide clarity in response to points raised.</p> <p>We acknowledge the comment re: phasing but Islington has so few large sites remaining that there is low possibility of any significant phasing. Holloway Prison Site SPD has a community infrastructure phasing requirement. Site allocation NH7 will add reference to this in development considerations. It is not necessary to repeat national policy.</p> <p>LBI will continue to work with DfE as part of the Duty to Cooperate and will notify of future consultations. LBI's evidence base suggests no new schools will be needed as the borough now has sufficient capacity for the foreseeable future (2028/29) based on current data. Ealing's best practice example is noted if future needs materialise.</p> <p>CIL could be used to fund necessary improvements. An Infrastructure Funding Statement is therefore unnecessary however this position will be kept under review.</p> <p>SOCG are being sought from neighbouring boroughs and cross borough student movement will be considered as possible heading within SoCG where relevant.</p> <p>Consideration of securing contributions for policing, and whether this would constitute infrastructure, is a matter for any future CIL review, or if appropriate, as part of any future revisions of the S106 SPD.</p> <p>In response to Public Health, reference will be added to the requirement regarding the undertaking of a Community Impact Assessment to require developers to engage with relevant bodies involved in provision of services. Paragraph 3.144 will be amended as requested. Reference to cited strategies not considered necessary.</p> <p>All relevant planning applications would need to justify loss of social infrastructure regardless of an allocation. No change made to SC1 but amendment will be made to allocation in question – ARCH5 - to clarify this.</p>

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		<p>Landowner request Sui Generis use private clubs are not classed as social infrastructure.</p> <p>A resident supports the policy but request an additional paragraph be inserted between Part A and B to address development impacting on facilities in all adjoining boroughs.</p>	<p>Amendment to SC1 not necessary to clarify that a private club is not SI, but site allocation FP16 will be amended to provide clarity.</p> <p>Re: cross-boundary impacts, the Council will ensure that cross-boundary impacts are mentioned where relevant.</p>
Policy SC2: Play space	Local group and residents.	<p>Support from a local group and a resident, especially in regards to retention of adventure playgrounds and provision of free to use spaces, as well as the inclusion of 'positive risk'.</p> <p>Another resident notes issue related to loss of space as part of Andover Estate proposals. Respondent considers it is not a good idea to build more housing for families by taking away a space that those families will need for recreation and that replacement space is not sufficient in terms of quantum or location.</p>	<p>Support is noted.</p> <p>Comments re: Andover Estate refers to a specific planning application for new homes which has been approved. Play space, both formal and informal, is an important element of new development, as set out in the draft Local Plan.</p>
Policy SC3: Health Impact Assessment	Landowner, resident, GLA and Camden and Islington Public Health	<p>Camden and Islington Public Health comment that for major developments a health impact screening assessment (HIA) should be submitted at pre-app stage. Clarity is also required to ensure HIAs are proportionate to the size of the development and not limited to access to health services.</p> <p>A landowner expresses support for the policy and the need for a screening assessment of all major developments.</p> <p>A resident states guidance should be provided for requirements of developments along major roads.</p> <p>GLA express support and comment Policy SC3 is in line with Policy GG3 of the draft London Plan</p>	<p>Part A does state 'as early as possible in the development process. The supporting text will be amended to note that pre apps should have regard to HIA and we encourage submission of screening at pre-app stage. The supporting text will also be amended in relation to proportionality.</p> <p>HIA guidance includes consideration of air quality, noise and vibration on busy roads. The Plan also has specific policies on air quality.</p>
Policy B1: Delivering a range of affordable business floorspace	Landowners, local groups and residents, GLA, Business Improvement District	<p>General support for aim to promote new business floorspace and deliver a range of workspace types and sizes. Support for policy requirements including cycle parking.</p> <p>A resident suggests provision of more small workspaces and opportunities for start-up businesses.</p> <p>Several landowners suggest flexibility to provide a mix of uses alongside business floorspace, including residential, retail, leisure and hotels.</p> <p>One landowner supports the objectives to safeguard LSIS for industrial uses but this should include industrial related Sui Generis uses. Reference for potential co-location with non-industrial uses should be identified via relevant LSIS site allocations should be made.</p> <p>Local group highlight need to create an Islington for the circa 70% who do not own a car along with an attractive public realm. Improvements to Clerkenwell Green, Clerkenwell boulevard, and low traffic neighbourhood in Central Street,</p>	<p>Policy B1 seeks to provide a range of workspaces and aims to secure affordable workspace.</p> <p>Evidence highlights demand for 400,00sqm of additional office floor space by 2036. The proposed amendments allowing greater flexibility for other uses would not be conducive so delivering this. Policy as drafted allows flexibility for delivery of some supporting uses across various locations.</p> <p>Sui generis uses akin to business floorspace fall within the definition of business floorspace for the purposes of the Local Plan. Further minor amend to policy B2 will add clarity - this also reflects wording in policy SP3, paragraph 2.27 which allows certain Sui Generis uses with a clear industrial function within LSIS.</p> <p>Council considers co-location with non-industrial uses could compromise the economic function of the LSIS.</p> <p>Sustainable transport is strongly supported in the plan.</p> <p>Amendments will be made in supporting text to refer to London Plan table A1.1 guidelines.</p>

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		<p>GLA comment the council's office space demand is slightly higher than that in the London Office Policy review 2017 but supports the approach. Reference should be made to table A1.1 of draft London Plan.</p> <p>Landowner suggested inclusion of definition of business floorspace which includes reference to sui generis employment uses.</p> <p>Landowner suggests that they should not be 'duty bound' to provide affordable workspace, and that the requirement should be applied flexibly.</p> <p>Landowner strongly objects to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2 of the Regulation 18 Islington Local Plan 'Strategic and development management policies' and draft associated 'Site allocations' DPDs (Allocations VR1 – 10) (November 2018). Suggested amendments to policies SP3, B1 and B2 provided.</p>	<p>A glossary of terms will be included in the next version of the Strategic and Development Management Policies document. This will include a definition of business floorspace, which will include sui generis uses akin to B-uses.</p> <p>Delivery of affordable workspace is an important priority and will be required where new business floorspace is promoted, including town centres.</p> <p>Response to landowner objections to the proposed policy framework for Vale Royal / Brewery Road area set out above in policy SP3.</p>
Policy B2: New business floorspace	Landowners, Statutory consultees, local residents and groups, local business, Business Improvement District, Camden and Islington Public Health	<p>Broad support for the policy from a number of respondents.</p> <p>The GLAs conformity response and subsequent clarification letter support Islington's approach to protect its Locally Significant Industrial Sites (LSIS) for industrial uses, namely uses in Class B1(c), B2 and B8 uses as set out in London Plan policy E4. GLA also support proposed paragraph 4.13 which prevents non-industrial uses locating in the LSIS, in line with draft new London Plan policy E6. Where there is pressure for office use, draft new London Plan policy E1 is clear that B1a floorspace should be located in the Central Activities Zone and town centres, which is reflected in Islington's approach to office locations.</p> <p>Landowner supports the renewal, modernisation and intensification of LSISs and supports the objective of protecting the primary economic function. However, it is considered that the blanket restriction for industrial uses, rather than protecting the long term function of the site, would in fact compromise future opportunities for the renewal, modernisation and intensification of such sites. Viability implications to modernise or intensify have not been considered. Draft London Plan Policy E7 should be reflected regarding co-location as well as the Agent of Change principle.</p> <p>Landowner notes that not all areas in the Bunhill and Clerkenwell AAP are established office locations. To support the viability and delivery of new development residential uses should be considered to support office development, consistent with Policy 4.3 London Plan and SD5 Draft London Plan.</p> <p>Landowner objects to inclusion of site in a Priority Employment Location citing unsuccessful marketing of employment space; planning permission for 4 residential dwellings; site is enclosed by residential development. Residential development should be allowed as there is no justification to prohibit this. Respondent argues the site is spatially removed from the PEL and that Islington evidence encourages residential led schemes</p>	<p>We welcome the support for our approach to protect LSISs, detailed in the Mayor's response and subsequent clarification letter.</p> <p>Support noted for the renewal, modernisation and intensification of LSISs, and the objective of protecting the primary economic function. The Council considers that the co-location with non-industrial uses is not considered acceptable as it could compromise the economic function and future economic growth of the LSISs. The GLA conformity response highlights that the council's approach to industrial land is consistent with the draft London Plan.</p> <p>Bunhill and Clerkenwell is well connected and evidence shows the CAZ has the highest demand for Grade A office space. Increase in business floor space is essential for job growth, making this a priority here. Employment Land Study identifies 400,000sqm of additional office space by 2036 is needed to satisfy demand and pipeline development will not come close to this. Residential use may harm the primary economic function. London Plan policy SD5 gives greater weight to offices in the CAZ than residential development.</p> <p>The Employment Land Study recognises many of Islington's micro and small businesses are located outside of the CAZ and these locations should be nurtured. Particular site mentioned is within an existing employment designation. Policy B2 is consistent with the current and emerging London Plan and Policy E7C does not apply to this area. The ELS also forecasts a need for an additional 400,000 sqm of office space by 2036.</p> <p>Policy B4 requires affordable workspace at peppercorn rates and Policy B2 requires provision of a range of unit types and sizes.</p> <p>The LSIS is Islington's most significant remaining industrial area, and as such the council seeks to protect its industrial function. Introduction of other uses such as offices and residential could significantly undermine this</p>

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		<p>outside the CAZ. Reference to Draft London Plan E7C is made to support residential co location with industrial uses.</p> <p>A resident suggests an amendment to include peppercorn rents for reasonably sized small premises as developers interpret the policy to provide unusable shoebox size units.</p> <p>656 set responses were received relating to potential impacts on Tileyard Studios, particularly their plans to expand. These responses were mostly from businesses who currently operate at Tileyard Studios; there were also a number of responses from businesses located in the wider industrial area; and from a number of other businesses/individuals outside Islington. The responses raised very similar issues, most using exactly the same template wording and statistics. All respondents raised issues with policy B2, while a majority also commented on policy SP3. In terms of policy B2, respondents objected to the classification of the Vale Royal/Brewery Road LSIS as only suitable for Light Industrial and Warehousing, as this would prevent the expansion of Tileyard Studios, claimed to be Europe's largest creative industry hub. An additional local business echoed this response.</p> <p>Corporation of London City Surveyors Department consider that designation of a new Locally Significant Industrial Location (LSIL) at North Road under draft policy B2 and identified in the proposed Policies Map changes is considered unnecessary and has the potential to undermine Islington's and the City's objectives for the promotion of growth and new business floorspace.</p> <p>TfL consider the policy too restrictive and suggest a spatial approach, optimising transport investment and capacity improvements brought by Crossrail2 to promote mixed use developments.</p> <p>Camden and Islington Public Health team request new business floor space should promote health and wellbeing through good design.</p> <p>Landowner requests that new business floor space in identified locations should be an aspiration, largely achievable on larger sites with greater economies of scale.</p> <p>Landowner requests an amendment is made to ensure Sui Generis employment uses will be afforded the same protection as those within the B Use Classes.</p> <p>Landowner suggests that Policy B2 and site allocation for their site OIS10 should allow residential uses as part of a mixed scheme. Respondent cites draft London Plan policy E7C and the London Employment Sites Database to justify this, as well as stating the Council has historically failed to meet its targets for housing.</p> <p>Various other landowners respond similarly re: allowing mix of uses within various employment designations, including residential use.</p>	<p>function. This area has been an industrial area for much of its recent history, including at the point at which Tileyard Studios commenced occupation at their current site. It is noted that the council's approach identified in policy B2 is considered to be consistent with the draft London Plan industrial policies. For clarity, policy B2 would have no impact on the existing operation of Tileyard Studios, nor would it preclude expansion involving B1(c) and/or hybrid space which could accommodate the types of uses evident at Tileyard Studios currently.</p> <p>The new North Road LSIS designation does not preclude growth, rather promotes the intensification of industrial uses and the development of hybrid workspace. We also note that the area is currently designated as an Employment Growth Area in the adopted Local Plan; the LSIS designation builds on this, reflecting the character of the area and helping to achieve the wider economic objectives of the council.</p> <p>Approach in B2 reflects significant need for new floorspace to meet jobs projections. The GLA have noted that this approach is in general conformity with the London Plan. Crossrail 2 is first and foremost a transport scheme; it will bring improved capacity and accessibility making new business floorspace in the vicinity of CR2 stations an even more attractive proposition. Regardless, it does not have an agreed formal business case and is currently unfunded, so it is not considered appropriate to significantly amend one of the draft plan's key priorities to reflect something which is so uncertain.</p> <p>Health and wellbeing is embedded in the vision and objectives and repetition is not necessary in this policy.</p> <p>The council has a considerable demand for new office space and the ELS highlights the need for business floorspace in non CAZ business locations to support micro and small businesses.</p> <p>The Council recognises that sui generis akin to business uses should also be permitted and protected in Policy B2 and B3. We will amend policy B2 to replace B-uses with business floorspace, which will ensure that appropriate sui generis uses will be covered by the policy.</p> <p>Policy B2 is consistent with the current and emerging London Plan and Policy E7C does not apply to this site. Significant business floor space is required within the plan period and greater flexibility for mix of uses could undermine this. Islington's housing target has reduced significantly and we can demonstrate a healthy 5-year land supply. Islington has met or exceeded housing targets in all bar one year since targets began.</p> <p>The council have carefully considered all evidence in the round in arriving at policies in the draft plan. There is clearly considerable need for new office floorspace hence the plan puts in place a strong policy priority to maximise delivery of new floorspace. This priority works in conjunction with the priority for housing; the council can demonstrate a healthy five year supply of housing to meet projected targets. The council does not consider the evidence is dated. There has been no significant shifts in market</p>

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		<p>Landowner notes that the draft Local Plan takes a different approach to the adopted plan by seeking business floorspace as an absolute priority. The evidence base to support this approach is now dated and should be updated for purposes of the policy review. Expresses surprise that inflexible recommendations of evidence have been taken forward without taking into account wider development plan policies.</p> <p>Landowner also objects to the “specific role and function” of the Angel and Upper Street location suggesting that that this is solely a business location, akin to the City of London or Canary Wharf. It is not. It is a mixed use town centre which includes residential development, as acknowledged by the adopted Islington Core Strategy. Notes that the Sainsbury’s site AUS6 is within a town centre and is a low density retail store. There is no office floorspace on site and any new provision will be a net increase. Part E is excessive and has not been viability tested.</p> <p>Landowner of site BC52 requests that medical research uses (B1b) be captured in policy B2 A (i) re: the CAZ.</p> <p>Landowner strongly objects to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2 of the Regulation 18 Islington Local Plan ‘Strategic and development management policies’ and draft associated ‘Site allocations’ DPDs (Allocations VR1 – 10) (November 2018). Suggested amendments to policies SP3, B1 and B2 provided.</p>	<p>circumstances or context that would render the conclusions, and the need for a large amount of new floorspace to meet projected jobs growth, invalid. The respondent has not sought to provide any meaningful commentary on the methodology or the reasons why it is considered dated (which is presumably just because of the date when it was published).</p> <p>The Local Plan does not claim that Angel and Upper Street is akin to the City or Canary Wharf; it notes that the area is an important business location. It is perfectly possible for an area to have a business function and not be the City/Canary Wharf; there are hundreds of such areas in London outside City/Canary Wharf. Angel does have residential uses but in no way can they be considered equitable, in terms of their influence on the function and character of the area, to commercial retail and business uses. The lack of existing office on site AUS6 does not affect a proposed allocation. If suitability of an allocation was predicated on the same use existing on site currently, this would preclude residential uses also, which the respondent advocates. Part E is considered justified and offers significant flexibility which means viability should not be constrained.</p> <p>Policy B2 A (i) will not be amended but specific reference will be made re: B1B uses in the allocation.</p> <p>Response to landowner objections to the proposed policy framework for Vale Royal / Brewery Road area set out above in policy SP3.</p>
Policy B3: Existing business floorspace	Statutory consultees, landowners	<p>Sport England consider D2 sports uses to be acceptable on employment sites as they create employment opportunities and work experience. Sports facilities as part of employment developments create more sustainable working environments. Recommend that safeguarded B1, B2, B8 use sites are expanded to include recreation and sports facilities.</p> <p>Corporation of London express support for the policy and intention to introduce Article 4 Directions for the change of use from office to residential.</p> <p>A landowner expresses that Policy B2 and B3 do not go far enough to protect Sui Generis employment generating uses</p> <p>GLA commented that ‘business floor space’ should be defined and differentiated from non-industrial floor space. Islington should follow Policy E7 draft London Plan approach. Where proposals result in the loss of industrial floor space, this should only be acceptable where this forms part of a masterplan/plan led approach that sees industrial floor space increase across the LSIS or whole borough.</p>	<p>Not considered appropriate to extend protection in B3 to D2 sports facilities. They have protection under policy SC1 and are not a relevant employment use re: chapter 4.</p> <p>The council recognises sui generis uses akin to business use should be permitted and protected. This will be clarified through amended definition of business floorspace.</p> <p>The draft Local Plan seeks intensification of industrial floorspace. We will seek to clarify any confusion regarding use of business floorspace, and will include a glossary in the next iteration of the plan. Reference to non-designated industrial space will be included in amended policy B3, specifically requiring no net loss of such space.</p>
Policy B4: Affordable workspace	Landowners, local residents and residents association, GLA, Business Improvement District	A number of landowners raise issue with the AW requirement. Impacts on viability were predominantly cited and that the 10% requirement is too onerous. Respondents commented greater flexibility needs to be afforded and the 1000sqm development that triggers the policy is too small for affordable workspace to be viable.	<p>Local Plan viability testing indicates that the provision of at least 10% affordable workspace can be achieved in the identified locations without negatively impacting overall scheme viability.</p> <p>Policy will be amended to remove requirement from B1c and B8, although the council considers that it should apply to B1b space. The council</p>

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		<p>Landowner questions application of AW requirement on B1c and B8, and issues with accommodating 10% AW from a design perspective. Another landowner made a similar comment re: B1b use.</p> <p>Two landowners object to use of gross floorspace to calculate AW, as this could be an onerous requirement on any development proposal which seeks to extend the existing building or indeed replace the building and create a limited uplift. AW should apply to uplift.</p> <p>Landowner requests clarification of what type of fit out constitutes affordable workspace. The policy does not differentiate between conventional workspace and affordable work space.</p> <p>BEE Midtown agree with the policy's principle however, wish to see how this will be delivered and the criteria the council will use.</p> <p>A local resident comments a different approach would be better because the 10% AW requirement will be allocated to the most undesirable space that people will not want. The council should acquire its own workspace and lease this out directly. Another resident comments that space should be affordable and not shoebox sized units. A residents association supports provision of affordable space for creative industries and SMEs.</p> <p>The GLA comment Islington should clarify their approach so it is in line with draft New London Plan policy E3 or E4 or both.</p>	<p>considers that provision of 10% floorspace will not cause any issues re: building design.</p> <p>It is the intention of the policy to require 10% of overall gross B-use floorspace. There may be some flexibility regarding some extensions. The council will add wording to the supporting text to clarify this.</p> <p>Category A fit out requirements will be clarified in the next version of the plan. Policy B3 sets out general business floor space design standards. Policy B4 and paragraph 4.43 sets out specific AW standards. The differentiation between conventional and affordable workspace is clear.</p> <p>The Inclusive Economy Team manages the process for secured affordable workspace. Further information is provided in the Affordable Workspace Strategy and the supporting text.</p> <p>In response to residents and the residents association, the policy has criteria to ensure space is well designed and located appropriately within developments.</p> <p>Draft plan has a clear requirement for affordable workspace, and has other policy which requires a range of office typologies to be provided within new development across Islington, including small units. The London Plan approach is reflected when the plan is considered in the round.</p>
Policy B5: Jobs and training opportunities	Landowners	A landowner suggests higher trigger for policy requiring placements; while another landowner suggests flexibility to allow for financial contributions in lieu of on-site construction training opportunities	The threshold set out in the draft policy is considered appropriate. The Planning Obligations (S106) SPD notes that, should it not be possible to provide these placements, the Council will seek an equivalent contribution (based on a formula set out in the SPD).
Policy R1: Retail, leisure and services, culture and visitor accommodation	Statutory consultees, Landowners, Residents, Local Groups, Business Improvement District	<p>Broad support for policy from two statutory consultees, and local organisation.</p> <p>Business Improvement District support the approach but a more flexible approach should be taken to cumulative impacts in Clerkenwell and non-vertical drinking establishments. An increase in these establishments as well as restaurants, cafes and private members' clubs that increase dwell time could trigger growth in the area.</p> <p>TfL request Part L read ...'The Council will work with partners to support and manage a thriving and safe night time economy that is well-served by safe and convenient sustainable night-time transport.'</p> <p>Corporation of London request reference is made to the Culture Mile and joint working with Corp of London in cultural issues in the CAZ.</p> <p>Landowner, Lambs Passage Real Estate Ltd and London City Shopping Centre Ltd comment the policy is overly restrictive for hotels. Visitor accommodation should be allowed on sites with existing planning permission.</p>	<p>Planning is governed by use classes which provides a blunt tool to control non-vertical drinking establishments. However, policies in the plan do seek to protect and promote A3 and other retail/leisure uses. Cumulative impacts will also be part of the licensing regime and whilst material in planning terms this would depend on case by case circumstances.</p> <p>Amendment to be made as suggested by TfL.</p> <p>Reference to the Culture Mile will be made with the Bunhill and Clerkenwell AAP.</p> <p>Restriction of visitor accommodation is needed to meet other priorities. Existing permissions would allow hotel development as per terms of the permission. However, any extant permissions should be subject to updated policy requirements to reflect updated evidence.</p> <p>Re: potential for residential use in Town Centres, Retail Study 2017 identifies residential uses as a risk to the availability of commercial floor space and the introduction of commercially incompatible uses. The policy provides a balanced approach by encouraging residential outside core area.</p>

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		<p>Landowner supports the broad approach of the policy. However, they request reference to residential uses having significant potential for adverse impacts and the requirement to be located away from core retail and located on upper floors, should be removed as this is unsubstantiated and contrary to national and regional policy.</p> <p>A resident states they do not want nail bars or betting shops.</p>	<p>Policy R8 seeks to limit overconcentration of betting shops and other uses where there is a specific harm due to concentration.</p>
Policy R2: Primary Shopping Areas	Landowners	<p>No objections to the policy from one landowner, but other landowner requests clarification that 60% A1 threshold applies to ground floors only.</p>	<p>Policy will be clarified but intention is for policy to apply to units with a presence at ground floor which could include units which span multiple floors.</p>
Policy R3: Islington's Town Centres	Statutory consultees, Landowners, developers, and a local group.	<p>Inclusion of D2 uses in town centres supported by Sport England. Theatres Trust support flexibility of Part B which gives scope for Sui Generis uses to come forward outside of designated town centres.</p> <p>Local group suggests extension of PSA to Elthorne Road (covered by policy R2).</p> <p>Developer queries inclusion of 1 Elthorne Road in the town centre arguing that it is not appropriate as it has not been identified in the Town Centre Healthcheck as being within a core shopping area and holds limited economic or social value. Developer also welcomes the provision to change from A1-A5 to C3, however feels the marketing evidence requirements is exhaustive and should be more contextually flexible.</p> <p>A landowner suggests amendment to allow for residential uses at ground floor in town centres, in line with national policy. Additionally, they request that if there is no pre-existing history of town centre use then a landowner should not be forced to provide one.</p> <p>Landowner suggests clarification of policy to reflect fact that residential uses at upper floors will require a ground floor entrance/exit which will be a residential use.</p>	<p>PSA extension not warranted – current boundary considered to cover critical mass of retailing in Archway.</p> <p>1 Elthorne Road includes existing main town centres uses, is suitable for redevelopment for main town centre uses, and is located in close proximity to a range of main town centre uses. This would suggest that its continued inclusion within the town centre is justified. The healthcheck document referred to was produced to support the adopted Local Plan and is now 6 years old.</p> <p>The council do not agree that the marketing and vacancy requirements of Part G(i) is too restrictive; it is a fair requirement which allows flexibility but strongly promotes the retention of commercial uses in town centres, which are vital to sustain vibrancy and viability of town centre uses in town centres that sustain vibrancy and viability.</p> <p>The Retail Study 2017 notes the introduction of residential units of all size pose a risk in terms of loss of commercial floor space and incompatibility of uses. Although some town centres elsewhere in the country are partly residential in character, Islington's are uniformly commercial in character, hence GF residential is considered to be generally unsuitable and will not be actively promoted. With regard to proposing a town centre use on a site with no such pre-existing use, the site in question was previously a town centre use before becoming vacant. Regardless, if suitability of an allocation was predicated on the same type of use existing on the site currently, this would also preclude residential use which the respondent advocates.</p> <p>Policy will be clarified re: ground floor access.</p>
Policy R4: Local Shopping Areas	Local group, landowner, business, resident	<p>A local group want to see LSAs outside the CAZ protected from large national chains. Viability permitting, housing should also be incorporated into LSAs.</p> <p>A landowner supports the need to futureproof retail centres and designation of Old Street LSA. However, there is conflict with the AAP and 6-month marketing vacancy evidence will not allow required flexibility and Part B(i) should be deleted.</p> <p>A business supports policy R4 which they consider renders policy R8 Part B(iii) unnecessary.</p>	<p>Policy R4 seeks to protect local shops but planning operates on the basis of use classes and is unable to resist proposals on the basis of them being a chain. Residential uses will not be actively promoted due to their impacts on retail function (amongst other impacts) but policy has criteria to assess proposals for new residential use.</p> <p>Policy R4 applies across the borough and is clear that leisure uses are suitable within LSAs. There is no conflict with the AAP; policy BC2 encourages retail and leisure in LSAs, as does R4, but that does not override the protection of A1. As noted in para 4.83 of the SDM, the 6 months marketing and vacancy requirement is itself designed to increase flexibility; the council considers that 6 months is the opportune length of</p>

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		A resident comments many LSAs can be revitalised through traffic management and public realm improvements. Wheelchair access must not just be to home but all streets.	time to ensure that continued demand for A1 can be properly tested without causing a significant impact on an LSA as a result of the vacancy. R4B criteria relates to all non-A1 commercial uses (as the focus is on the loss of A1 not necessarily the resulting use). Other non-A1 commercial uses such as A3, A4 and B1 do not have an evidenced impact on health and wellbeing and they also are considered to contribute more to the mix and balance of uses in a retail/leisure focused area. Additional restrictions in R8 are therefore considered justified. The council is seeking to minimise car use through car free development and promote other sustainable transport modes.
Policy R5: Dispersed retail and leisure uses	Local group, resident	Resident expresses strong support of acknowledging the need to promote independent retailers and businesses. National chains are cornering the market and dominating retail space. Resident would support a policy of affordable rent allocation for small retail business. A local group want to see LSAs outside the CAZ protected from large national chains.	Policy R6 states applicants for significant retail development will be encouraged to seek out independent retailers for small units. However, the council has no powers to ensure occupation by independent firms. Policy R5 seeks to protect local shops but planning operates on the basis of use classes and is unable to resist proposals on the basis of them being a chain.
Policy R6: Maintaining and enhancing Islington's unique retail character	Local group	Comment that viability permitting, new housing developments should incorporate the building of appropriate shops and services.	Policy R6 already stipulates this.
Policy R7: Markets and specialist shopping areas	Business	Comment made in support of policy in principle, re: Fonthill Road. However, it is felt to be too restrictive by requiring a 75% A1 target as well as prevention of a break in continuity of more than one non retail A1 unit in a linear stretch of three units. This will inhibit the area to respond to market changes.	Support is noted. The specialist shopping area is an important function of Finsbury Park thus requiring a strong level of protection. The percentage restrictions are based on survey data.
Policy R8: Location and Concentration of Uses	Local Group, Betting shop and restaurant businesses.	Local group support the proposal to resist overconcentration of hot food takeaways (HFT) and within 200m of schools. McDonald's Restaurant Ltd provide a number of comments. They support the aims of the policy but request further studies to establish a causal link between obesity and HFT. As such the policy is unsound and too restrictive. Public Health England note the causal link is only theoretical. Waltham Forest introduced a school proximity policy in 2008 yet their obesity rate has increased. Reference to various pieces of research were made purportedly supporting McDonald's views. Information provided relating to nutritional value, economic and environmental benefits, support of healthy active lifestyles, community engagement. A 200m school restriction would have unacceptable negative land use consequences and is inconsistent with the NPPF. Current wording provides no flexibility in accordance with town centres and the sequential test. Consideration should be given to school rules about being let outside school grounds at lunchtime. This is overly restrictive on secondary	Support noted. LBI consider the policy to be sound and based on appropriate proportionate evidence. McDonalds suggest that gold-plated longitudinal evidence is required which is their own invented requirement. Public Health England guidance in 2017 highlights the role planning can play in controlling over concentration and proliferation of HFT, especially within close proximity to schools. The Waltham Forest example is an isolated example and it cannot be reasonably concluded that the restriction did not work at all, as planning is only part of tackling obesity as part of a multi-faceted approach. The submitted research is noted but it does not demonstrate that a policy will be ineffective. We note that the evidence cites is the same as submitted for the response to the SPD in September 2015, meaning no additional research has been provided in the intervening 3 and half years. The existence of healthier options on the menu does not negate the fact there are also unhealthy options. The principle of Policy R8 is one of preventing negative impacts and works in conjunction with other initiatives to promote healthy lifestyles and diet. Most McDonald's are classed as an A3 use and the distinction between A1, A3, A5 are explained in the Location and Concertation of Uses SPD.

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		<p>schools, where some pupils will be legally classed as an adult. Additionally, some secondary school students will have access to a car</p> <p>It is unclear how the 200m zone is measured.</p> <p>Other A class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy R8 to focus exclusively upon hot food takeaways (A5).</p> <p>The policy is likely to be damaging to the district's economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.</p> <p>Students are only at school for 50% of the year making the policy ineffective.</p> <p>Respondent cites various instances where planning inspectors have dismissed the use of similar A5 restriction policies.</p> <p>Power Leisure Bookmakers Ltd make several comments. They consider that the policy is not consistent with the NPPF or NPPG and cite section 23 of the Legislative and Regulatory Reform Act 2006 as needing to promote proportionate, consistent and targeted regulatory activity.</p> <p>Paddy Power shops make a positive contribution to the diversity of uses in retail centres. Respondent agrees with Part A but objects to Part B(iii) a) and b). Policy R8 seeks to restrict over-concentration of betting shops and adult gaming centres, which is an arbitrary grouping. The restrictions are too stringent and a high proportion of Local Shopping Areas are performing well according to the LSA Healthcheck 2012.</p> <p>The policy is not prepared positively as it does not account for the good health of many of the Local Shopping Areas. Respondent references their own evidence, claiming Paddy Power shops often attract higher visitation rates than many A1 shops of similar size and can attract new customers to a centre.</p> <p>The proposed 200m exclusion zone and threshold limit in town centres is not justified or founded on evidence. This along with the general 500m concentration assessment would effectively place a moratorium on any new operator in all centres.</p> <p>A 1.5% restriction is far less than the 3.5% proportion that an inspector in a Leytonstone appeal found to be low in comparison to other non-A1 uses. Such as approach is contrary to the NPPF town centre first approach and this will impede competition between different operators. The high vacancy rates in Archway and Nags Head could be exacerbated by this clause B(iv).</p>	<p>Paragraph 91 of the NPPF states policies should enable and support healthy lifestyles especially where this would address identified local health and wellbeing needs'. The NPPG notes LPAs could limit the proliferation of certain uses classes in identified areas. A 200m exclusion zone is not a blanket ban and is already adopted in the current Local Plan. The draft London Plan advocates a 400m exclusion zone but due to Islington's size and context a pragmatic approach has been taken, as a 400m zone would result in an effective blanket ban.</p> <p>Re: the sequential test, the respondent's concern would only materialise where an A5 unit is proposed in an out of centre location; a sequential test is undertaken which identifies a potential site; but this site is within 200m of a school. The respondent seems confused about how planning policy and guidance would apply if such a situation was to arise. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) sets out the primacy of the Development Plan, unless material considerations suggest otherwise. Of note is that decisions must be made based on the plan as a whole; undoubtedly, at times, policies might pull in different directions in terms of their intended outcomes, but ultimately there are different layers which apply, and in the case of HFT uses in close proximity to schools, there is a strong resistance in place. This would influence any sequential assessment in terms of assessing whether an alternative site is truly suitable.</p> <p>School rules vary significantly, hence why they are not a reliable proxy and have no bearing on journeys at the start or end of the day. A secondary school pupil could only be legally classed as an adult during the final year of (non-compulsory) sixth form. For the vast majority of time, pupils would not be classed as adults, and there are some pupils (i.e. those whose birthday falls in July to August) who would not be classed as an adult for their entire school life. It is highly unlikely any students travel to school by car in Islington due to high levels of public transport, lack of parking and high costs of using a car in central London.</p> <p>Detailed guidance on the 200m distance is provided in the SPD.</p> <p>The A5 restriction is partly due to the limited scope of planning. We recognise that non-A5 uses can sell unhealthy food but A5 uses on the whole have a range of unhealthy food on their menus. Part C of policy R8 explicitly requires the Healthy Catering Commitment to be applied to non A5 uses selling food and drink.</p> <p>Policy R8 mirrors existing policy DM4.3; it therefore has precedence. The economy of Islington has not suffered any obvious damage as a result of the 6 years of implementation of DM4.3.</p> <p>Schools are open for a significant amount of the year and certainly enough to generate unhealthy lifestyle choices.</p> <p>The respondents have cherry picked parts of the cited inspectors' decisions and other research. There are a number of LPAs (Lewisham, Lambeth, Wandsworth and Hackney, as well as Islington) who have successfully</p>

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		<p>Object to the link between health and betting shops. The Retail Study 2017 does not reference this and there is a lack of evidence to support this bold claim.</p> <p>Betting shops are different to other Sui Generis uses such as pay day loan shops because they provide a leisure activity and a link should not be made. Betting shops are also distinctly different from adult gaming centres and could restrict new betting shops establishing if considered together. Any restriction should consider single uses on a case by case basis.</p> <p>Believe that Part D of Policy R8, which is supplemented by Paragraph 4.105 and Paragraph 4.107 is unnecessary. Licensing is an established process in what is already a heavily regulated industry. The content of Part D would be covered by licensing and if anything, this muddies the waters in what is a mandatory process that is already in place that we do not disagree with.</p> <p>Forging a correlation between betting shops and crime can also not be justified. Paddy Power's approach to crime is without compromise. Paddy Power wants its customers and members of the public to feel safe at all times. On a wider point, and despite the fact that the Council has no evidence to back up the discourse above, it is important to note that gambling is one of the most heavily regulated activities in the country – this has resulted in a socially responsible industry.</p> <p>A number of councils have omitted the link between poor health and gambling</p>	<p>adopted policies restricting HFTs near schools. This is a significant proportion of London boroughs, and is not the product of extensive research - there may be more boroughs with adopted policies. Importantly, the policies have been upheld on appeal, evidenced by decisions in Islington and Lewisham.</p> <p>Policy is considered to be in line with national policy. The Regulators' Code does not apply to planning documents, as planning is not a regulatory regime which falls under the scope of the code, as defined under the Legislative and Regulatory Reform (Regulatory Functions) Order 2007. Notwithstanding this, the draft policy does not directly or indirectly restrict any regulators who are bound by the Regulators' Code, e.g. licensing authorities.</p> <p>Betting shops can undermine the retail function, vitality and viability especially when clustered together. Overconcentration can impact on health and wellbeing. As per the NPPF paragraph 91 planning policies should enable and support healthy lifestyles.</p> <p>Updated evidence including information provided by the public health team updated surveys of LSAs provide justification for the policy approach. A topic paper will set out further information on the health of these centres in terms of key metrics. The 2012 LSA health check is no longer relevant and has not been relied on for the formulation of the plan.</p> <p>Planning appeal decisions from across the country provide clear demonstration that betting shops can impact on vitality and viability. We note the consultation statement which accompanies the Location and Concentration of Uses SPD; this deals with many of the issues raised by Paddy Power, as the same issues were raised during preparation of the SPD. With regard to the ESA retail survey, this information has not been provided as part of the response but we have had sight of it previously and have a number of concerns about its validity and methodology.</p> <p>The restrictions operate alongside each other to limit overconcentration and clustering uses. The 500m radius covers a general assessment of overconcentration and applies to a number of uses including betting shops. Because of the specific impacts associated with betting shops, an additional layer is considered necessary to fully restrict adverse impacts re: clustering. 200m is considered to be a sensible distance which will ensure that uses are not located in very close proximity to one another (limiting harmful impacts associated with clustering) whilst also not arbitrarily restricting development of further uses where justified (which a greater distance would do). We will clarify the policy to note that it is a 200m walking distance.</p> <p>Betting shops have specific negative impacts other non-A1 uses do not. Archway, Nag's Head and Finsbury Park have a level of betting shops above the national average which demonstrates the need to restrict. No evidence to suggest proposed restrictions will increase vacancy rates and vacancy rates in Archway and Nags Head are not considered 'high'. Individual appeal hearings have different contexts and cannot be applied</p>

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			<p>uniformly. Regardless, the Leytonstone inspector also notes the following, which highlights that over-concentration could arise from as little as two unit</p> <p>Updated evidence from the public health team identify links between betting shops and poor health and wellbeing. The 2017 Retail Study is largely a quantitative exercise but notes the amount of betting shops is higher than the national average.</p> <p>Betting shops and adult gaming centres are very similar in that they have a focus on gambling. Part A merely highlights the different types of uses that may be considered but does not imply all uses would be considered as part of an assessment. Restrictions based on a case by case basis would ignore broader impacts. The restrictions are plan led and based on evidence.</p> <p>Part D in no way compromises the licensing regime which is separate and merely brings the information required by planning in line with that required by licensing. Part D requirements already exist in the SPD. The council considers it necessary to bring these elements into the plan proper due to their importance at addressing potential harmful impacts of betting shops and AGCs.</p> <p>There is evidence of increases in crime and ASB in and around betting shops. In planning terms, potential increases in anti-social behaviour, crime and disorder are valid material considerations in assessing betting shop applications, and have been upheld in planning appeals. In 2016 the Gambling Commission identified a number of serious failing by Paddy Power Holdings Ltd in relation to keeping crime out of gambling and protecting vulnerable people. This suggests the licensing system alone may not be enough to limit harm.</p> <p>Different Local Authorities have different issues and Islington is the most densely populated borough in the country therefore issues of concentration can be felt acutely. There are other boroughs such as Newham where policies have been adopted which do define the link between local health impacts. This link is also supported by a broad range of evidence.</p>
<p>Policy R9: Meanwhile/temporary uses</p>	<p>Statutory consultees, landowner</p>	<p>Sport England have concerns that D2 uses are included in this policy and any loss of sports facilities should be the result of an identified surplus. The NPPF does not differentiate between permanent and temporary uses.</p> <p>Landowner supports the policy in principle but comments that the time allowed for meanwhile use is insufficient to attract potential occupants and should be extended to a maximum of 5 years.</p> <p>The Theatre Trust has a similar view and would like to see a relaxation of policy to allow the continued renewal of temporary permission.</p>	<p>Policy R9 can only be applied to vacant premises and any loss of a sports facility would have to comply with policy SC1.</p> <p>A key aim of the council to secure permanent development which can meet identified needs. A maximum five-year period (or any prolonged period of temporary uses) could discourage permanent development and is considered de facto permanent. Additionally, the impact of temporary uses on localities may not be fully apparent and may turn out to be unsuitable. A five year period of operation could therefore cause issues including amenity problems.</p>
<p>Policy R10: Culture and the Night Time Economy</p>	<p>Landowner and statutory consultees</p>	<p>Landowner supports ambition to retain unique cultural assets. However, implication of Part C is potential protection of unviable sites. Marketing evidence requirement is vague and 'other' sites needs defining.</p>	<p>Part C does not protect sites in perpetuity as there is a process for justifying the loss. Marketing evidence requirements are clear in Appendix 1 but reference will be added to policy. Examples of other uses are identified in para 4.117.</p>

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		<p>Theatres Trust find Part A and D to conflict with Policy R3 and R9 because Part A directs such uses to the CAZ and town centres whereas R3 and R9 afford some flexibility. Support for Part C but could be strengthened through emphasising marketing effort must be a rent or sale price appropriate to the existing use.</p> <p>GLA support policy approach. London Plan night time economy classifications should be reflected in Policy R10 and supporting text.</p>	<p>Policies R3, R9, R10 all prioritise cultural uses in town centres and CAZ but other locations can still be justified. Appendix 1 sets out clear marketing criteria.</p> <p>Support is noted and council will amend policy supporting text to reflect London Plan table A1.1.</p>
Policy R11: Public Houses	Statutory consultees and local groups	<p>Support from all respondents.</p> <p>Theatres Trust would like to see emphasis on marketing efforts to be a rent or sale price appropriate to the existing use.</p> <p>GLA request need for emphasis on supporting new pub proposals in line with London Plan policy HC7</p>	<p>Appendix 1 already sets out this marketing requirement as requested by the Theatres Trust.</p> <p>Policy R10 already promotes new public houses in identified locations as per GLA suggestion.</p>
Policy R12: Visitor accommodation	Statutory consultee, local group and landowner	<p>The local group do not consider that hotels compete against Grade A office developments and suggest that they provide employment and facilitate the economy day and night.</p> <p>The GLA support Islington's balanced approach to hotel development.</p> <p>Landowner considers that policy overly restricts hotel development in the borough and suggests amendment to allow visitor accommodation on sites with existing planning permission for such uses.</p> <p>GLA comment support for the policy and find our approach that prioritises office space to be balanced.</p>	<p>There are instances where hotels have displaced office space. Although hotels generate employment, offices provide more and better quality employment which is a greater priority.</p> <p>Restriction of visitor accommodation is necessary in order to meet other priority development needs. It would not be appropriate to amend policy as per suggestion; existing permissions would allow development of hotel as per the terms of the permission, and the proposed policy change would not change this. It is right that any changes to extant permissions should be subject to updated policy requirements, to reflect change in local evidence and priority uses.</p>
Policy G1: Green Infrastructure	Statutory consultees, Landowner, Local and regional Groups, Residents	<p>Local residents express general support and make a number of minor suggested amendments. Several residents and a local group request that the council adopts a more ambitious Urban Greening Factor, as do the GLA.</p> <p>Support from landowner, the Environment Agency, Sport England and a local group.</p> <p>Canal And River Trust note there is no glossary included to define if 'green infrastructure' includes watercourses and waterbodies. Part C should also require developers to assess the value of adjacent green infrastructure to the site to avoid adverse impacts.</p> <p>Cycle Islington request green infrastructure should enable people to walk and cycle not encourage them.</p> <p>Neighbourhood Planners.London request mention of the NPPF in allowing communities to identify and designate local green space in neighbourhood plans should be made.</p> <p>Living Streets Islington request a ban on conversions of front gardens into parking spaces and ban parking spaces where there is no clear access from the street.</p>	<p>Support from residents is noted. Some minor suggested amendments have been made for clarification. With regards to a more ambitious UGF, the council do not intend to prepare bespoke UGFs imminently, but we have noted in policy that this may, in time, be developed through a future SPD. LBI expect urban greening to be designed into schemes from the beginning.</p> <p>Watercourses and waterbodies will be included in the definition. Amendment will be made to clarify that impacts on adjacent green infrastructure should be considered.</p> <p>Cycle Islington amendment not necessary as current wording sufficient.</p> <p>Local green spaces will be added as a type of green infrastructure in section 5.</p> <p>Paving front gardens is permitted development. Any proposal that wasn't would be subject to policy G2(D).</p> <p>Planning application for the Andover Estate has already been approved. Draft Local Plan identifies a number of priorities relating to housing, economy, sustainability, transport etc. Balanced judgements will be</p>

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		Resident makes comment in relation to redevelopment on the Andover Estate and how this encroaches unfairly on the green space there.	necessary where it is not possible to deliver fully in accordance with all policies.
Policy G2: Protecting open space	Statutory consultees, Residents, Local Groups.	<p>Local residents and a local group express general support and make a number of minor suggested amendments.</p> <p>Sport England allow loss of playing fields for sport development e.g. Artificial Grass Pitches, changing rooms etc. but Policy G2 would not allow this and prevents improvements to existing sites. Policy G2(A) must allow such development to comply with the NPPF. Agent of Change principle should apply to impacts of existing sporting facilities on new development.</p> <p>Sport England find there to be a contradiction between Part A and C. Also, Part C needs to require any loss of playing fields to be replaced by at least equivalent provision in quantity and quality to comply with the NPPFD and any partial loss should not affect sporting capacity/function. Comment also made that the NPPF does not distinguish between public and private land in relation to sport provision.</p> <p>Sport England also comment that with regard to Policy G2 D, the NPPF does not differentiate between public and private land in relation to sport and recreation provision therefore the NPPF, paragraph 97, and Sport England's Policy applies equally to both private and public land.</p> <p>Canal and River Trust unclear if G2 applies to watercourses or waterbodies. In not permitting any development on public open space and significant private open spaces, policy G2 is not sufficiently flexible to respond to applications that may deliver net open space benefits. This may include, for example, the development of facilities within waterspaces (if included within the Local Plan definition) that help to support their use for sport and recreation. We suggest that the policy should be amended to support schemes that deliver net benefits in order to avoid unintended consequences.</p> <p>A resident requests open space in large housing estates should be open to everyone. Also requests 'should' changed to 'must' and respondent questions what 'overlooked' means.</p>	<p>Support is noted. Some minor suggested amendments have been made for clarification.</p> <p>LBI have to balance a number of competing objectives and cannot have policies to address concerns of everyone. Islington is the most densely developed borough in the country and it is essential open space is protected absolutely. Policy DH5 will apply to relevant applications</p> <p>Open space on housing estates are informal semi-private spaces which are a different open space classification, thus there is no contradiction. There are no playing fields on housing estates. Improvement of multi-functional use is sought by the policy. Proposals affecting redevelopment of private open space featuring existing sport provision would be considered under policy SC1 and G2.</p> <p>Any proposal affecting the redevelopment of private open space featuring existing sports provision would be considered in line with both policy SC1 and G2.</p> <p>Glossary will define green infrastructure which does include certain watercourses and waterbodies. It is important to put in place strong protection of open space and the council is therefore reluctant to open the door for any development on public open space and significant private open spaces.</p> <p>Open space that is accessible to communities is included. 'Must' and 'should' will be clarified. Overlooked means provision of uses which provide natural surveillance which assist with mitigating crime.</p>
Policy G3: New public open space	Statutory consultee, Residents, Landowner, Local Group	<p>Sport England object to a standards approach for sport facility provision as this ignores what type of provision is needed. A Playing Pitch and Built Sports Facility Strategy should be used instead.</p> <p>Landowner supports Part C specifically. Part B should require assessment of quality, flexibility and usability of existing public open space so capacity can be maximised through enhancement, favouring delivery of multi-use public open space.</p> <p>Cycle Islington question why Part C has the caveat 'should'?</p>	The principle aim of the policy relates to public (ideally green) space, not sports and recreation; this is covered by policy SC1, in terms of existing and new provision. The Council has undertaken an update to its Sports Facilities evidence base and anticipates to publish this ahead/alongside the future Reg 19 consultation, following consultation with Sports England. This will address the requirement set out in paragraph 96 of the National Planning Policy Framework. The council have discussed the Playing Pitch element of the study with Sports England prior to the start of the commission, and have agreed a bespoke approach reflecting the unique borough context. Any relevant standards identified in the study will help inform the regulation 19 draft Local Plan.

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Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
		<p>Local group request all new housing should include public green space and new parks should be designated.</p> <p>Resident makes a number of suggested minor amendments.</p> <p>Another resident states that green infrastructure should be linked to walking and cycling route networks and sustainable transport and should be referenced in policy T2(D) and G3.</p> <p>Resident makes comment in relation to redevelopment on the Andover Estate and how this encroaches unfairly on the green space there.</p>	<p>Supply of new open space is likely to be limited, therefore policies for large scheme developments to provide new open spaces rather than contributing to existing is needed. Multi-use space could undermine the primary aspect of open space.</p> <p>Error noted and the word 'should' has been removed.</p> <p>While we support new public open green space, there is limited land available in the borough, and many competing development needs. The Local Plan balances these needs to ensure that they are all addressed as effectively as possible.</p> <p>None of the minor suggested amendments considered necessary.</p> <p>All developments are required to at least preserve and enhance green infrastructure. Specific types of flower is deemed to prescriptive.</p> <p>Policy G3 Part D covers points raised. Policies in section 7 would also apply.</p> <p>Planning application for the Andover Estate has already been approved. Draft Local Plan identifies a number of priorities relating to housing, economy, sustainability, transport etc. Balanced judgements will be necessary where it is not possible to deliver fully in accordance with all policies.</p>
Policy G4: Biodiversity, landscape design and trees	Statutory consultees, Residents, Local Groups.	<p>Support from Environment Agency, local groups and residents, including Islington Swifts Group who consider that the policy requirements represent best practice. Two residents make a number of suggested minor amendments. This includes comments on process for replacing trees.</p> <p>Canal and River Trust generally support the policy but request holistic landscape design to ensure lighting schemes are sensitive to local biodiversity and would help counterbalance policy T4.</p> <p>The GLA comment LBIs approach is supported, however guidance set out in draft London Plan policy G6 should be more closely followed, especially in seeking net biodiversity gains from development and application of the mitigation hierarchy where harm to SINC is unavoidable. Islington's Biodiversity Action Plan (2010) should be updated.</p> <p>GLA also comment that whilst tree protection is welcomed, reference to policy G7 of draft London Plan should be made and the use of i-Tree Eco or CAVAT should be required to establish suitable replacements based on the beneficial value of the trees removed.</p> <p>Resident makes comment in relation to redevelopment on the Andover Estate and how this encroaches unfairly on the green space there.</p>	<p>Support noted. Some minor suggested amendments have been made for clarification.</p> <p>Amendment to policy will require development to demonstrate how biodiversity is sensitive to lighting schemes, particularly where roosting bats have been found.</p> <p>Policy G4 has been amended to encourage proposals to achieve biodiversity gain, however no amendment will be made to reflect the mitigation hierarchy as this would undermine strong protection of biodiversity sites. Part F text has been amended to clarify Islington Biodiversity Action Plan, which is currently being updated, will be used to support wider protection of species outside the SINC network.</p> <p>Policy has been amended to reflect Policy G7 of draft London Plan. LBI Tree Service record the CAVAT value for every tree inspected. I-Tree survey has also been commissioned and this will be used to develop a tree planting strategy.</p> <p>Planning application for the Andover Estate has already been approved. Draft Local Plan identifies a number of priorities relating to housing, economy, sustainability, transport etc. Balanced judgements will be necessary where it is not possible to deliver fully in accordance with all policies.</p>
Policy G5: Green roofs and vertical greening	Residents, Local Groups	Residents and local groups support policy. Several provide suggested minor amendments.	Some minor suggested amendments have been made for clarification.

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		<p>One resident considers that restrictions on roof extension in conservation areas should be relaxed to allow for green roofs.</p>	<p>Policy DH1 supporting text states that protection of the historic environments must be reconciled with environmental, social and economic needs. The IUDG gives guidance on acceptability of roof extensions. The nature of such applications means that they must be considered on a case-by-case basis. Policy G5 would support provision of green roofs on roof extensions.</p>
<p>Policy S1: Delivering Sustainable Design</p>	<p>Local groups, Statutory consultee, residents.</p>	<p>Local groups, a number of residents and the GLA all express support for the policy. This includes commitment to reducing pollution and maximising air quality; ensuring developments are designed to mitigate effects of climate change; support the heat network infrastructure; all buildings in Islington to be zero carbon by 2050.</p> <p>A local group suggest a requirement to assess the issue of embodied energy in cases of demolition.</p> <p>The Canal and River Trust considers its waterways should be viewed as local energy resources that can be used for heating and cooling. Support the reference to the use of local energy resources and welcome a potential new energy centre powered by a water source heat pump in the AAP. Further engagement with the council to consider how the network may be able to support heating and cooling networks.</p> <p>A local group and resident suggests the Local Plan should set ambitious timescales for the transition of heat network to low carbon heat sources.</p> <p>In relation to Part B residents and local groups state that zero carbon target should be earlier than 2050. One group suggests it is unrealistic to achieve zero carbon for all buildings and suggest an alternative target that all new buildings are zero carbon by 2025. Another suggests an amendment to ensure compliance with the European Performance in Buildings Directive (2002), that all new buildings be 'nearly zero carbon' buildings, equivalent to Passive House standard, by 31 December 2020, and introduce a certification system through building control to confirm this, following reliable testing.</p> <p>Local group and resident supports the energy hierarchy but want assurances that on site generation is not seen as 'nice to have'.</p> <p>A local group notes that to reduce pollution and maximise air quality, we think the borough should undertake another round of tree-planting and encourage other owners to do the same. The council should also maintain its policy of actively managing Tree Preservation Orders.</p>	<p>Policy S10 promotes a circular economy approach</p> <p>Support is noted. The Trust's comments regarding waterways as a local energy resource are supported in the plan.</p> <p>Currently there are no specific transition targets but this will be driven by carbon reduction targets through updates to the local plan and building regulations. Additional wording will clarify the council's approach to heat networks.</p> <p>Islington Council is committed to reducing carbon emissions. The Local Plan policies adopt an ambitious target for all buildings in Islington to be zero carbon by 2050. This aim has been informed by the Energy Evidence Base study carried out by Etude on behalf of Islington Council in 2017 and is also in accordance with the draft New London Plan. While the Mayor of London has pledged to ensure new buildings in London are net zero carbon by 2030, this target has not been incorporated into the draft New London Plan. Should the London Plan be amended, the council will consider changing the carbon reduction targets in the Local Plan. The Local Plan does acknowledge the Council's declaration of an environment and climate emergency.</p> <p>The Local Plan policies will ensure that Islington is on the right track to turn the Paris Agreement's aspiration to limit the temperature rise to 1.5°C into action. It will take a substantial period of time for developments in Islington to meet the 2050 zero carbon target due to the extent of the changes required, especially with regard to existing buildings. The development industry will need time to make the necessary changes to incorporate more efficient construction methods/approaches and low carbon heating systems, as well as ensuring the target does not undermine the viability of development or restrict required development growth. The required minimum on-site reduction targets will increase over time in future Local Plan updates, as will the required minimum reductions in energy demand, in order to ensure that Islington is on the right trajectory to meet the 2050 target and enabling CO2 emissions to be further reduced between 2034 and 2050. The gradual changes in targets will take account of the reducing costs of more efficient construction methods and the availability of low and zero carbon heat.</p> <p>Part C requires all development to maximise energy efficiency and minimise CO2 emissions. Developments are required to follow each stage of the hierarchy and it is a widely accepted government and industry standard. Focus is on reducing energy demand in first instance. Supporting text for S1 and S4 will add clarification to the approach.</p>

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			New planting and protection of existing trees is covered by green infrastructure policies.
Policy S2: Sustainable Design and Construction	No comments received	N/A	N/A
Policy S3: Sustainable Design Standards	Statutory consultee, local business, resident	<p>Department of Education question that in the context of the need to maximise the efficient and effective use of public funds, is a requirement for schools to achieve BREEAM 'excellent' rather than 'very good' justified. The DoE are conducting research to explore the difference in capital costs between building schools to BREEAM 'Excellent' and 'Very Good' and note interest in discussing with the council's energy team.</p> <p>Business objects to homes being required to meet a four-star rating under BRE Home Quality Mark scheme, citing the ministerial statement that removed the use of Code for Sustainable Homes; using a tick box system creates a level of ineffective bureaucracy. They consider process to measure and report performance post completion would be more efficient; Home Quality Mark has not been widely tested to see if the requirements are achievable; and why is there a bias to meet HQM when alternative sustainability certification schemes such as Passivhaus can be just as effective.</p> <p>Business also comments that it is not clear how the use of 10% recycled material is to be measured.</p> <p>Business notes that BREEAM should not be required, let alone at a rating of 'excellent' or 'outstanding' because: it is proved that a building designed to BREEAM outstanding does not mean it will use less energy. This adds burdens to clients without measurable benefits; the BRE have waiting times of more than 6 months for quality assurance checks for certification and developers should not have to wait; suggest that performance in-use is prioritised over a rating system such as BREEAM.</p> <p>Business considers that policies S1, S2, S4, S5 and S6 thoroughly cover energy and sustainability while pushing the boundaries. Thus Policy S3 does not add to potential sustainability of a development, it just stifles creativity and increases cost.</p> <p>A resident notes Policies S3, S9, B1 calls for rainwater harvesting, however this should only be implemented in the right context when there is a viable payback and a sensible proportion of mains water use avoided.</p> <p>Environment Agency note that Islington is based in an area of considerable water stress and welcome all steps to reduce consumption of water in the Local Plan.</p>	<p>It is important to maximise sustainable design standards and would be inappropriate to create exceptions for certain uses. Case by case material considerations may justify lesser standard where a new school is proposed. Planning to speak to the Energy Team.</p> <p>The Housing Standards Review Ministerial Statement removed the requirement for the Code for Sustainable Homes to be used in policy and sought to prevent policies requiring developers to comply with housing standards other than the building regulations and the optional technical standards, in order to reduce burdens on developers and encourage residential development to come forward. Due to the level of housing being delivered in Islington, it is not considered necessary to reduce standards in order to increase delivery. In the context of development pressure and high densities in Islington alongside the impacts of climate change, it is vital to ensure that development in the borough meets the highest feasible standards of environmental sustainability.</p> <p>A four star rating under the BRE Home Quality Mark scheme alongside the Fabric Energy Efficiency Standard will support developers to achieve sustainable design policy requirements. Measuring performance post completion would fail to ensure developments meet the sustainable design requirements from the start of the process. Where it can be demonstrated that a development cannot achieve a four-star rating, a lower standard may be accepted. Finally, there is no bias to require the Home Quality Mark over alternative certification schemes. Passivhaus is encouraged by policy as it would achieve a higher standard.</p> <p>The 10% recycled material target will contribute to making a more regenerative and sustainable built environment. Further requirements are set out in Policy S10.</p> <p>The draft New London Plan encourages boroughs to include BREEAM targets in their Local Plans and states that achieving energy credits as part of a BREEAM rating can help demonstrate that energy efficiency targets have been met. The BREEAM methodology provides a holistic assessment of the environmental sustainability of a development. There are many benefits of using a nationally recognised system, particularly when there are relatively few models or standards available which cover all aspects of sustainability. Issues of short-term resourcing re: quality assurance checks should not affect long-term policy ambitions - issues to do with lack of availability of assessors can be dealt with a case-by-case basis. Comment suggests that performance in-use should be prioritised over a rating system such as BREEAM. This would, however, fail to ensure that development proposals meet the sustainable design requirements from the start of the design process. It should be noted that in-use performance will be covered by the Green Performance Plan.</p>

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			<p>Policy S3 requires all developments achieve the highest feasible level of relevant sustainable design standards. This requirement seeks to strengthen the policy requirements outlined in other sustainable design policies whilst providing developers with a means to demonstrate compliance. The flexibility of assessment methodologies should ensure creativity is supported while high standards of sustainability are achieved.</p> <p>Rainwater recycling is only required where feasible. The draft New London Plan recognises rainwater as a resource and clarifies prioritisation of surface water run off management and attenuation as a resource. If this is not possible to designer must consider the next option. Part L requires rainwater recycling systems for major developments and for minor developments where feasible. Clarification will be added to paragraph 6.116 to note that assessment of potential harvested supply includes consideration of available roof space.</p>
<p>Policy S4: Minimising greenhouse gas emissions</p>	<p>Landowner, local groups and residents,</p>	<p>Landowner expresses support aspiration to ensure new development is sustainable. However, such sustainability targets could be onerous and affect delivery of smaller commercial refurb schemes. It is suggested the policy is reworded to ensure the requirements only apply to refurbishment schemes that exceed 5,000+sqm GIA additional floor space.</p> <p>Local groups and a resident all express support for the requirement for new developments to be net zero carbon. Comment that minor non-residential new build developments should not be exempt from being net zero carbon.</p> <p>Local group and local resident suggest extension proposals only be granted if energy efficiency is improved or renewable energy capacity is installed. Local groups and a local resident welcome the encouragement of bio solar roofs but feel all new buildings should be required to generate on site renewable energy, instead of being third in the hierarchy.</p> <p>Local group and local resident comment that residual carbon emissions offset payments need to be high enough to act as a penalty for developments failing to meet zero carbon. The current £95/tonne fee would not be sufficient. They also query what lifespan will be assumed to calculate the remaining emissions to be offset for major developments.</p> <p>Local group and local resident request the adoption of Passivhaus standards in all new developments.</p> <p>Another resident comments Policies S4 and S5 should require shower waste water heat recovery to be implemented where viable as it has good returns.</p>	<p>There is provision in Policy S4 for developments where it is not viable to pay the full cost of offsetting the remaining regulated emissions. Part F states that in cases where it can be demonstrated that payment of the full offsetting contribution is not viable, the maximum viable payment for offsetting will be required based on a viability assessment.</p> <p>Specific carbon reduction targets for minor non-residential new-build developments have not been applied because research indicates that the viability of achieving such standards varies significantly between these types of schemes and could undermine the viability of the development. Policy S4 requires all developments, including extensions, to demonstrate that they have reduced carbon emissions in accordance with the energy hierarchy. In addition, Part G requires householder extensions to contribute to reducing emissions from the whole building as far as possible by applying cost-effective energy efficiency measures to the existing property, in addition to requirements applicable to the extension itself. These details must be demonstrated as part of the Sustainable Design and Construction Statement in order for the application to be deemed acceptable.</p> <p>Research indicates that the viability of achieving such standards for minor non-residential new builds varies significantly between schemes and could undermine the general viability of these schemes. Building regulations ensure increases in carbon emissions from minor developments are minimised by setting minimum energy efficiency requirements for new builds. Minor non-resi new builds are required to demonstrate how carbon emissions will be reduced in accordance with the energy hierarchy.</p> <p>The energy hierarchy is a widely accepted standard by government and industry. Focus is on reducing energy demand in first instance. This approach ensures high quality sustainable design.</p> <p>The setting of these fees included viability considerations to ensure that such developments would not be made unviable in the context of the other developer contributions to be paid, including the Small Sites Affordable Housing Contribution and the Community Infrastructure Levy. These fees may be revised in future Local Plan updates as further information and evidence becomes available. The calculation of remaining emissions to be</p>

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			<p>offset will be based on a 30-year lifecycle in accordance with the London Plan.</p> <p>Parts D, E and F outline the approach to offset any remaining emissions where the zero carbon target cannot be fully achieved on site, which will then allow the development to meet net zero carbon targets. The shift to zero carbon to 2050 will be gradual. Targets will increase as time goes on and the adoption of the Passivhaus standard may be a requirement in future local plans and is already encouraged in paragraph 6.31.</p> <p>The supporting text of Policy S4 will be amended to encourage the use of waste water heat recovery systems including in minor developments.</p>
<p>Policy S5: Energy Infrastructure</p>	<p>Resident, business, local group and the GLA</p>	<p>Local group and local resident requests clarification as to why air source heat pumps are not deemed acceptable as this can be a viable form of low or zero carbon heating if powered by clean electricity.</p> <p>Local business believe developments that are connect to a local existing or planned heat network should only be asked to do so where it can be demonstrated it can be run efficiently; the cost of heat to occupants is comparable to national average heating fuel costs; there is a zero emissions transition plan to achieve zero carbon emissions in operation. While they note the desire to prioritise connection to heat networks, this should not be to the detriment of the occupants. As a minimum heat networks should be demonstrated to be running efficiently and the cost to occupants comparable to national average heating costs. Where this is not the case occupants should not be expected to pick up the bill.</p> <p>They also suggest where low emission combined heat and power and ultra-low NOx gas boilers are specified, there should be a zero emissions transition plan to ensure zero carbon operation by 2030/2050.</p> <p>The GLA welcome the positive approach. However, amendments are required especially with regards to the heating hierarchy in line with the latest iteration of the draft New London Plan.</p>	<p>Operational, control and fuel poverty issues related to the use of individual air source heat pump systems means they are not currently considered suitable in most minor developments. ASHPs are less suitable in residential buildings which tend to have high heat/hot water demands. Currently communal heat pump led systems will be supported rather than individual systems. The Environmental Design SPD contains further information on the use of ASHPs. The use of ASHP will continue to be reviewed when SAP10 comes into force and carbon factors have been updated, and in the light of the recent announcement regarding the phase out of domestic fossil fuel heating systems in new houses from 2025.</p> <p>Part F seeks to ensure suitable developments connect to a heat network unless it is demonstrated not to be feasible. Feasibility assessments and life cycle costing take account of running and installation costs, and that the cost of heat to occupants is comparable to national average heating fuel costs. Performance/efficiency of the network is a key part of these considerations. Regarding the proposed zero emissions transition plan this is covered in paragraph 6.6 of Policy S1. Proven low carbon CHO technology using natural gas will start the networks, with planned future transition to cost effective secondary sources.</p> <p>This has been discussed with the council's Energy Team who have advised that it would not be feasible to require this due to the significant resource requirements of monitoring multiple individual heating systems. Furthermore, any transition plans are likely to have to cover periods of 20-30 years or more, which raises issues relating to monitoring anything over a very long period, and that transition plans may be overtaken by changes in circumstances over decades-long periods. Low-NOx boilers have an expected lifetime of 12-30 years, depending on factors including whether the development is residential or non-residential, and the type of boiler/system. Given these timescales, alongside the national targets, it is expected that there will be a significant evolution in building regulations over this period, which would drive decarbonisation of existing heating systems. In addition, where boilers are serving communal systems, the opportunity to connect to a low or zero carbon heat network may have arisen by the time of replacement, or alternatively these may be replaced by other technologies, such as heat pumps.</p> <p>Policy S5 has been amended to take account of the minor suggested changes. Heating hierarchy has been updated including removal of</p>

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			reference to fuel cells and use of CHP is only acceptable where this would enable delivery of an area wide heat network.
Policy S6: Managing heat risk	Local resident	<p>Part E wording should require all residential extension applications to demonstrate strategy to avoid overheating, thus avoiding mechanical air conditioning.</p> <p>Part D should specify use of the latest CIBSE overheating assessment methodology, currently TM59.</p>	<p>Part E has been subsequently amended to clarify active cooling is acceptable unless other methods higher up the hierarchy cannot be delivered. Wording is based on active cooling rather than mechanical ventilation, as the latter can cover a wide variety of systems from simple extractor fans right up to whole-development ventilation systems.</p> <p>Paragraph 6.71 requires all major developments to demonstrate overheating has been addressed by meeting latest CIBSE guidance. CIBSE TM 59 is to be used for domestic developments and CIBSE TM 52 for non-domestic developments.</p>
Policy S7: Improving Air Quality	Statutory consultees, Residents, Local Groups	<p>A resident suggests a zero tolerance approach should be taken in terms of air quality.</p> <p>A range of respondents express their support for the objective to make developments at least air quality neutral</p> <p>The Canal and River Trust suggest it should be made clear that prevention of significant harm to air quality applies to indirect impacts as well as direct. They give the example of development adjacent to the Trust's waterways which can result in the overshadowing of moorings. Boaters cruising the network and those on moorings, especially those that do not offer power connections, will often install solar panels to help reduce emissions. However, overshadowing can make these much less effective. In such cases, they suggest that the Council should require that the impact is mitigated through a requirement for the developer to provide power connections (if possible utilising sustainable energy) at the moorings through a planning obligation.</p>	<p>The policy will be redrafted to take account of responses and other considerations, but the fundamental principle of S7 is to ensure that air quality is not worsened.</p> <p>Points noted. There are other policies which look to protect operation of adjacent land, which would include consideration of impacts on operation of solar PV, e.g. PLAN1. Amend not specifically necessary re: policy S7.</p>
Policy S8: Flood Risk Management	Statutory consultee	<p>Environment Agency raise concern that the policy does not clearly specify a requirement to undertake a sequential flood risk test, risk based approach to development location and the exception test as required under paragraph 157-162 NPPF. Policy S8 has not made use of the SFRA recommendations in this respect and there is no evidence of a sequential test being carried out for all the allocated sites. SFRA conclusions should be used to formulate specific policy criteria on: the application of the sequential, risk based approach; how to manage flood risk from all sources; how developments can be resistant and resilient under climate change adaptation and mitigation; and ensure safety of occupants.</p>	<p>Based on these comments and taking into account the recommendations of Islington's SFRA, Policy S8 has been amended to make it clear that developments required to submit a site-specific FRA under Part A (and are not included in the site allocations) are required to carry out the Sequential Test in order to ensure that the vulnerability classification of the proposed development is appropriate to the flood risk. The sequential test should be applied as part of the site-specific FRA using the procedure for demonstrating the Sequential Test for Planning Applications set out in the DEFRA and EA Flooding and Coastal Change Guidance. This procedure includes identifying any 'reasonably available' alternative sites and the use of the Sequential approach to locating development within the site.</p> <p>The constrained nature of the borough and development pressure mean that it is unlikely that there will be alternative locations where developments could be located. As a result, vulnerable development types will be permissible in areas of medium or high surface water flood risk (based on the Environment Agency's RoFSW mapping) on the condition that they achieve the drainage requirements (set out in Policy S9), incorporate sufficient flood resilient/resistant measures where required (set out in Part D of Policy S8), and apply the sequential approach to development layout (see below). This means that in the majority of cases the Exception Test will not be required as it can be demonstrated that flood risk will be clearly</p>

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			<p>outweighed by other sustainability factors and that the development will be safe during its lifetime, considering climate change, through the use of mitigation and adaptation measures.</p> <p>Policy S8 has also been amended to ensure that developments required to submit a site-specific FRA under Part A are required to apply the sequential approach to development layout within development sites to locate the most vulnerable elements of a development in the lowest risk parts of the site. As mentioned above, the Sequential Approach to site layout is an important part of ensuring that vulnerable development types located in areas of medium or high surface water flooding will be safe for their lifetime. Part D of the policy already requires essential infrastructure in 'High' surface water flood risk areas to be located above ground floor level.</p>
Policy S9: Integrated Water Management and Sustainable Drainage	Statutory Consultees, resident	<p>A resident and Thames Water express support for the encouragement of an integrated water management approach.</p> <p>Canal and River Trust believe the Trust's waterways could supply non potable water at a local level to help meet on site needs, e.g. irrigation of landscaped areas. Point J should be amended to facilitate this. Additionally, Part A requires integrated approaches to water management which includes water quality but the policy does not resist development that does not protect it. The Environment Agency also had similar concerns around contamination.</p> <p>Environment Agency encouraged by policy addressing SuDs, water consumption targets, and major developments required to incorporate rainwater and greywater recycling systems and submit a Surface Water Drainage Pro-forma. Part E and I in relation to SuDs should have a requirement for a maintenance plan.</p> <p>The Thames River Basin Management Plan (TRBMP) and its recommendations should be listed as a development consideration where sites are adjacent to the New River and Regents Canal watercourses and be included in strategic policy. Maintaining good ecological status may be harder if this is not done.</p>	<p>Part J has been amended as per Trust suggestion.</p> <p>In relation to the EA and Trust's comments on Part A, amendments have been made to require development to demonstrate they will not negatively impact on local water resource quality. Amendments to ensure developing land affected by contamination will not create risks to human health and the environment and appropriate land uses are located within groundwater protection zones.</p> <p>Policy amended to require a SuDs maintenance plan.</p> <p>Reference has now been made to the TRBMP in policy and in relevant site allocations. Development adjacent to the New River or Regents Canal are required to protect and improve the benefits provided by the water environment.</p>
Policy S10: Circular Economy and Adaptive Design	Local Group	<p>Buildings should have longer lives and developers should be required to pay more attention to this to avoid it getting lost in the detail of Adaptive Design Strategy. Suggested amendments to Part B to require proposals to state the overall 'design life' of the buildings in the development.</p>	<p>Policy S10 requires developments to adopt circular economy approaches to design and construction and be designed to be flexible and adaptable over their lifetime. An additional requirement has now been added to Part D to require an Adaptive Design Strategy to include the overall design life.</p>
Policy T1: Enhancing the public realm and sustainable transport	Statutory Consultees, Residents, Local Groups.	<p>Sport England, Local groups and a resident express support for Policy T1, especially in terms of the prioritisation of walking, cycling, and public transport over private motor vehicles.</p> <p>TfL comment the Mayor's Transport Strategy target of 80% of all journeys to be made by foot, cycle, public transport by 2041 should be included in Part D. Islington will need 83% of residents to use the modes of transport in 2021 and 89% in 2041.</p> <p>TfL: new development should be supported by a Transport Assessment using TfL Best Practice Guidance, Travel Plan, Construction Logistics Plan, Delivery and Servicing Plan, Parking Design and Management</p>	<p>Islington's Cycle Action Plan aims for cycling to double by 2024. Islington's Transport Strategy target is for 87% of journeys to be made by foot, cycle, public transport by 2041. The council will use our own figures.</p> <p>These requirements are already covered in the Plan. Appendix 3 references TfL best practice. Parking design and management plan will not be necessary due to the car free policy. Amendment will be made to comment re. buses.</p> <p>This cannot be directly controlled through planning policy. Paragraph 7.7 doesn't just specify car based but applies to other modes e.g. dockless bikes.</p>

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		<p>Plan. In support of paragraph 7.4 but the importance of buses should be reflected.</p> <p>TfL: paragraph 7.7 should also make reference to how car based on demand apps should be controlled.</p> <p>TfL: Reference to the Healthy Streets Wheel (Appendix C) in section 7.8 will help explain the Healthy Streets Approach.</p> <p>Local group suggest cyclists have distorted transport policy to the detriment of major road users. Also, the congestion charge zone should be expanded northwards and eastwards and the charge be increased.</p> <p>Cycle Islington highlight four principles which should underpin transport policies: designing for safe cycling; introduction of low traffic neighbourhoods need to be rapidly accelerated through use of motor traffic cells; road hierarchy should be created which designates roads by their functions; every street should be two way for cycling and new walking/cycling bridges across railway tracks should be built.</p> <p>Cycle Islington make various minor requests for amendments including: changing 'promoting' to 'enabling' in Part A and 'incentivise' to 'enable' in paragraph 7.4; Part C should clarify that improving efficiency with cargo cycles is a priority.</p> <p>Several residents make a number of suggested minor amendments.</p> <p>Canal and River Trust consider towpaths provide excellent opportunities for sustainable and physically active means of travel. Not only is it important that the quality of the towpaths meet the expectations and demands placed upon them but that the surrounding built and natural environment is attractive and safe.</p>	<p>The policy has sufficient reference to signpost to more substantive guidance in the London Plan and Mayor's Transport Strategy. The Healthy Streets wheel offers literally no further explanation on what the approach is and could create more confusion.</p> <p>Cyclists are not prioritised over public transport or pedestrians. The council has no power over the congestion charge.</p> <p>These principles are broadly covered in the Local Plan and Transport Strategy (where issue falls outside planning). Safe cycling by policy T2; reference to motor traffic cells is included in the transport strategy; road hierarchy may prevent council from having the ability to implement schemes on roads that are not on the hierarchy. Flexible, contextual approach is preferred.</p> <p>Minor amends not necessary as current wording sufficient. Modal shift is a priority but identifying cargo cycles as a specific way of achieving this is beyond the scope of the Local Plan.</p> <p>Minor amendments suggested by various residents are not considered necessary.</p>
<p>Policy T2: Sustainable Transport Choices</p>	<p>Statutory consultees, Residents, Local Groups, landowner</p>	<p>TfL, Sport England, a landowner, local groups and residents broadly support the policy.</p> <p>TfL comment Part B should reference the London Cycling Design Standards and Healthy Streets Approach. Part E(ii) should state cycle storage should be highly visible, safe and convenient.</p> <p>TfL suggest further policy guidelines in Policy T2 F to ensure public transport access, capacity and interchange improvements.</p> <p>TfL: deem approach to 'shared space' too restrictive and could prevent pragmatic walking and cycling solutions, and note DfT guidance has been updated. Part C should clarify level surface schemes in situations that have a high movement function will not be supported. Policy should be relaxed for new developments and residential streets with very low traffic flows/speeds. Compromise may be needed if the other option is not to deliver cycle improvements.</p> <p>Linked to comments on shared space, TfL consider section 7.32 should recognise the difference between shared space where motor vehicles are</p>	<p>LCDS already referenced in paragraph 7.15 and Policy T1 broadly references Healthy Streets Approach.</p> <p>LBI support the principle of visibility but it is unlikely all cycle storage could be visible e.g. when in a basement. Safety and convenience are sufficient parameters to achieve high quality storage.</p> <p>Amend T2F as requested.</p> <p>Shared space raises many concerns in terms of legibility and safety, and this policy is aimed at mitigating the impacts of shared space in regards to legibility. Our approach is further explained in our Streetbook SPD which provides principles of how street should be designed depending on their movement/place potential, requesting a contextual approach to designing streets. The policy will be reworded to reflect this point. It is the deployment of single surfaces to which we object. This policy was principally aimed at resisting the removal of kerbs and it is considered that kerbs at a minimum height of 60mm are necessary. In this case, shared surface may be acceptable only if it has been demonstrated that the space is logical,</p>

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		<p>expected, versus shared use footways where only pedestrians and cyclists will be present.</p> <p>TfL: paragraph 7.17 should read 'Cycle Parking provision (including visitor parking) must meet or exceed the minimum cycle parking standards in Appendix 4'.</p> <p>TfL suggest a number of other minor amendments</p> <p>A resident requests all new developments include electric car charging points.</p> <p>The Canal and River Trust welcome the link between public realm and sustainable transport. However, LBI's opposition to shared space in Part C may limit opportunity for towpath enhancement works. They believe that management, including through behaviour change campaigns is more appropriate than a presumption against it.</p> <p>A resident and local group express their support for restricting shared cycle/pedestrian spaces</p> <p>A resident commented Islington is not being bold enough in promoting sustainable transport and the emphasis on traffic flow prioritises motorists. Additionally, account should be taken of connectivity with adjoining boroughs pedestrian and cycle network. Another resident similarly wanted clarity on who 'other stakeholders/agencies' is referring to.</p> <p>Resident agrees with bus priority lanes but queries what 'other vehicles' refers to. Suggests other minor changes.</p> <p>A resident request that developers should be given the option to pay for on-street cycle shelters because of difficulty meeting current standards.</p> <p>Cycle Islington suggest part A should specify mitigation and prevention must occur during construction as well as in the finished development to provide safe cycling routes.</p> <p>Local group support bus priority measures but these should not reduce pedestrian crossing times; suggest developer contributions should support new zebra crossings; cycle parking should be on the carriageway not the pavement.</p>	<p>legible, inclusive and safe, responding to its context as established by the Streetbook SPD.</p> <p>Amendments made in response to TfL comment on shared space will address any confusion in terminology raised in other TfL comment. We consider both shared space and shared use of footway by pedestrian and cyclists as the last resort solution, only acceptable where it is proven to be very difficult to demarcate independent pathways for pedestrian and where issues of safety and inclusivity have fully been taken into consideration.</p> <p>Partial amend to clarify that text is referring to cycle parking. Reference to higher minimum standards, while supported in principle, may not be practical given other demands for space, therefore it is considered appropriate to refer to the standards generally.</p> <p>Some further amendments made in response to TfL minor suggested amendments.</p> <p>LBI operates a car free policy therefore a general requirement for electric charging points is not appropriate. Where parking is provided policy T2 requires charging points.</p> <p>Policy would apply to any space where there is potential conflict between pedestrians and vehicles which could include cycles. The council is proposing to clarify the policy in response to this and other comments received, to highlight that the main issue is with single surface. However, we consider that potential impacts must be prevented through the design of the scheme, rather than through management.</p> <p>We are revising our approach to shared space in light of comments received, but revisions will identify specific requirements and will only be acceptable in specific circumstances.</p> <p>The policy clearly prioritises sustainable transport. The council may add wording to relevant policies or generally, to clarify the need to consider cross boundary impacts (where necessary).</p> <p>Other vehicles refer to private motorised vehicles. Cyclists are not included and the wording will be amended to clarify this. No other amendments made in response to requested minor changes.</p> <p>The council is also investigating a spatial requirement (per square metrage) to replace the 'space per' current approach, which may lead to better quality, more usable provision. The suggestion of a contribution would conflict with CIL, particularly if contributions would be pooled to pay for hangars elsewhere in borough, which would have to be the case as it couldn't be guaranteed that hangar provision could be installed ad hoc outside new development.</p> <p>Part A is deemed sufficient to protect cycle infrastructure during construction and policy T5 also provides best practice.</p>

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Policy T3: Car-free development	Statutory consultee, Local Groups, Landowner, Resident	<p>Local groups, resident and TfL commercial development express support for the policy. Resident notes it only applies to new development and there does not appear to be any policy to reduce existing residential car parking spaces</p> <p>TfL city planning note strong support temporary use of bays as parklets or cycle storage while disabled parking is not required. Amendments to Part D and Part F suggested.</p> <p>TfL city planning do not support installation of car club bays in the CAZ given the high PTAL rating here. Any car club spaces outside the CAZ should have EVCP. EVCP should be located on the carriageway and not the footpath.</p> <p>TfL city planning comment Part G should be amended to reflect residential parking standards in Policy 16.1(G) and non-residential disabled person parking standards in Table 10.6 of the draft London Plan. Landowner request the policy be more in line with Policy T6.5 of the draft London Plan.</p> <p>Local groups and TfL city planning support keeping EV charging points off the pavement. It is noted that they should not encroach on cycling infrastructure on the highway. EVCP should be paid for by the developer.</p> <p>Local group request the policy should explicitly add a ban on new petrol stations.</p>	<p>Paragraph 7.13 already has clear guidance on pedestrian crossings although it is noted that pedestrian crossing times is a matter for the highway authority. Location of cycle parking is supported by policy T2 Part E and a number of policies considering inclusive design would apply, as would policy T4.</p> <p>The Local Plan cannot retrospectively remove existing parking permits, but does encourage repurposing of parking spaces.</p> <p>Parts D and F amended as requested</p> <p>Car clubs do not replace public transport. Car clubs reduce car ownership thus discouraging this in the CAZ is counterproductive to the car free policy. Part J of policy T3 requires EVCP as part of any parking provided.</p> <p>Policies on accessible parking will be amended in next iteration of the plan, although it is noted that the council's approach will not align exactly with that proposed in the London Plan.</p> <p>Policy supports on-street EVCP but we note that they can be accommodated on the pavement where adverse impacts are mitigated/prevented; this would include impacts on cycle infrastructure.</p> <p>A blanket ban on petrol stations is not possible. However, any application would be assessed against development optimisation and sustainable transport policies.</p>
Policy T4: Public realm	Statutory consultees, Local residents, Business Improvement District	<p>Sport England, a resident and BID express support for the policy. Residents and TfL suggest a number of minor amendments.</p> <p>The Canal and River Trust welcome Part A but suggest other factors such as microclimate, sunlight, character and heritage value should be referenced.</p> <p>In relation to paragraph 7.33 and 7.34, a resident notes that the legal agreement for POPS must ensure transparency as to who owns the sites, what regulations/terms of use apply and how they are policed. There should be no limit on activities that are a public right in the public realm i.e. national laws and local bylaws should apply in all cases without additional restraints. The legal agreement should be a condition of and agreed prior to the grant of planning permission. The legal agreement should comply with the policy set out in Policy G3 New Public Open Space paragraph 5.16 the last line of which states 'Access to such space should be unrestricted, meaning that spaces are readily available to the public at all times or during daylight hours, regardless of ownership or management'.</p>	<p>Support is noted. Several minor amendments made in response to suggestions.</p> <p>The factors identified are ones which development should consider in terms of their impact on the public realm and are covered by a range of policies.</p> <p>The policy sets clear requirements for public access alongside other requirements. Other relevant policies would also apply including those within chapter 5. Any legal agreement would be binding in its own right and would not necessitate a planning condition.</p>

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Policy T5: Delivery, servicing and construction	Statutory consultees, Residents, Local Groups	<p>TfL request the reference to use of Trip Rate Assessment Valid for London should be removed as this is out of date. Requirement for Construction Logistic Plans (CLP) and Delivery Service Plans should be referenced. For development with significant transport impacts, a 2 stage CLP is recommended. Outline CLP should be provided prior to determination and a detailed CLP secured by condition.</p> <p>Canal and River Trust request support for waterborne freight, especially in demolition and construction, in line with draft London Plan.</p> <p>A resident suggests instituting a residents and developers' forum where common issues which arise as a result of construction can be discussed and actions agreed relating to construction practices.</p> <p>Local group and residents request in relation to Part B that the use of cargo-bikes/clean modes of transport is required rather than investigated.</p> <p>A resident requests the policy should ban HGV movements during school drop off and pick up times.</p>	<p>Policy and supporting text amended in line with TfL suggestions.</p> <p>Reference to waterborne freight will be added.</p> <p>Any construction work is required to adhere to best practice techniques. Suggested forum would be unnecessary.</p> <p>Modal shift is a priority but identifying cargo cycles as a specific way of achieving this modal shift is beyond the scope of the Local Plan; such delivery models will clearly not be suitable for all businesses. Policy T5 does encourage last mile delivery through sustainable transport modes.</p> <p>Planning cannot ban HGV movements but paragraph 7.45 covers peak hour working including school starts and finishes.</p>
Policy DH1: Fostering innovation while protecting heritage	Statutory consultees, Landowners, Residents, local groups.	<p>Landowner considers a blanket approach to protecting all views inappropriate and will restrict development at Northampton Square. Policy should be amended to reflect the sensitivity of different views to change, and therefore instead state that those views which are important and sensitive to change should be protected. As such all developments that affects a view - strategic, local and local landmarks - should demonstrate a full understanding of the significance of the view and ensure that significance is protected and/or enhanced.</p> <p>Local group supports the policy but are concerned at the adverse impacts of tall buildings on historic views. Outside the CAZ there should be a 10 storey limit.</p> <p>Two landowners suggest changing of wording to allow tall buildings to be considered on a site by site basis.</p> <p>A landowner proposes the design vision for Farringdon could deck over the railway to provide development capacity and consider that the impact on Local View 1 (LV1) would be partly offset by a publicly accessible roof terrace. Comment applies to DH2 also.</p> <p>Sport England recommend having clear references to Active Design, its principles and the Active Design Checklist within the Local Plan. Active Design principles and the checklist, for example, could be added to the design requirements or codes referred to in Policy DH1 and, as noted above, within the specific places policies earlier in the document.</p> <p>Historic England suggest Clause A be reworded to ensure consistency with the NPPF. Historic England and a local group also comment that given many of the management plans for conservation areas are over 10 years old and that the subsequent change that has happened warrants an update. This will satisfy NPPF requirements for an up to date</p>	<p>The Council is required to protect views set out in the LVMF. In addition, the Council also has designated local views which it seeks to protect. As noted in the draft London Plan paragraph 7.3.6, local views should be given the same degree of protection as strategic views. We note that the GLA consider that our draft plan is in general conformity with the draft London Plan. The respondent misquotes draft London Plan; paragraph 7.3.1, first and foremost, states the Mayors intention to protect the composition and character of views, particularly if they are subject to significant pressure from development (and this wording is in bold for emphasis). We consider that the respondent's suggested changes would undermine the principle of protected views.</p> <p>Support is noted. Tall building study provides a strong basis for controlling building heights over 30m (approx. 10 storeys) and this will only be acceptable in principle on allocated sites. Vast majority of locations will be unsuitable for 10+ storeys.</p> <p>The councils approach to tall buildings over 30m – i.e. restricting them to specific sites - is informed by detailed evidence and is in line with the draft London Plan.</p> <p>Protection of views is an important aspect of the Local Plan. It would not be appropriate to identify circumstances where infringement of views is acceptable, as this significantly undermines the notion of a protected view. A roof terrace would not be a remotely adequate compensatory measure to outweigh impacts on LV1; aside from the fact that such roof terraces often require pre-booking and security checks (making them pseudo-public spaces), LV1 is a street level view, identified in part because it can be enjoyed in an incidental manner by all users of the public realm.</p> <p>No amendments to DH1 in response to Sport England but we note that the plan objectives have been amended. Broad principles of active design are embedded throughout plan.</p>

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		<p>evidence base and could inform future design codes. These updates should be read in conjunction with the Urban Design Guide SPD.</p> <p>The Canal and River Trust request the whole canal's structure is recognised as a heritage asset in Part E. The Trust also propose several new local views.</p> <p>Resident notes previous examples of poor application of council design policies. The same resident and other residents raise a number of issues which arise due to proximity of commercial and residential development in the CAZ including issues of overlooking and loss of light. Several examples of issues from recent planning applications are given. Section 1.60 says that a high quality design should put 'people at the heart of the process' and resident would like to see this adapted so that both residents and tenants are included as the 'people at the heart of the process'. Respondent also highlights issue about enforcement of conditions, giving an example of a scheme where it has taken years to get the building management to fix the broken lighting systems and ensure the lights are turned off when everyone goes home.</p> <p>Resident requests applications for residential extensions or loft conversions should be looked at more favourably as a way of maximising space and occupancy for families.</p> <p>Resident comments on the need for robust enforcement to preserve heritage, citing George Robey Pub demolition and two listed shopfronts on Stroud Green Road. Local group support the sub-reference to locally listed buildings and shopfronts in policies DH1 Part E & DH2 Part D is welcome but note the large number of locally listed shopfronts, especially those outside conservation areas, that have been lost.</p> <p>Local group state that an improved public realm is essential to getting the most out of heritage assets.</p>	<p>Amendment to Part A made in line with HE suggestion. The Local Development Scheme notes intention to update Conservation Area Design Guidance and the characterisation study will assist with this.</p> <p>The Regent's Canal is protected by Conservation Areas. We do not propose adding specific reference to the Regent's Canal under DH1 as we don't refer to any individual sites in this section, but rather the different types and designations of heritage assets. No plan to expand set of local views at present but suggestions will be retained for future reference.</p> <p>The council has developed robust design policies to ensure that development proposals are of a high quality and do not adversely impact the local amenities. The Local Plan also requires schemes to provide rigorous site appraisals considering a range of issues, including policy PLAN1. The agent of change policy DH5 would also apply. Policy DH3 restricts tall buildings and includes consideration of local microclimate impacts. Consideration of impacts across the public highway would be considered under policy DH5 and other policies which protect amenity. However, it should also be acknowledged that Islington, especially in the south, is very densely developed, so there will inevitably be issues affecting amenity that may not be able to be resolved fully; ultimately this will be assessed on a case-by-case basis. It is considered unnecessary to clarify paragraph 1.60 as requested, as this is already clearly implicit in the current wording. The Local Plan has no control over subsequent enforcement of conditions; this is a case-by-case consideration.</p> <p>Policy DH1 supporting text states that protection of the historic environments must be reconciled with environmental, social and economic needs. The IUDG gives guidance on acceptability of roof extensions. The nature of such applications means that they must be considered on a case-by-case basis.</p> <p>Amendments are unnecessary re: comments on robust enforcement to preserve heritage - policies offer sufficient protection currently. Re: shopfronts, the Urban Design Guide - referred to in supporting text - provides more detail on locally listed shopfronts.</p> <p>Reference to public realm in relation to heritage assets will be added.</p>
Policy DH2: Heritage assets	Statutory consultees, Landowners, Local Groups, Resident	<p>Corporation of London welcome the recognition and policy commitment to protect and enhance strategic and local views, including views of St Paul's Cathedral. Local group also support the policy.</p> <p>Historic England request a new clause in Policy DH2 to make explicit that relevant development proposals should seek opportunities to address negative factors which contribute to 'at risk' status of heritage assets through public realm enhancement and works to reflect character and significance. Changes to Archaeological Priority Areas (APA) descriptions, policy and supporting text are suggested based on the APA review.</p>	<p>Amendments suggested by HE will be made.</p> <p>The undesignated (or non-designated) heritage assets refers to those assets that have a historic value but are not formally designated. This includes locally listed buildings and shopfronts. Definition can be provided in the glossary in future versions of the plan. There are a number of locally listed buildings in the borough which are non-designated, but blanket protection of all pre-WWII buildings is unlikely to be acceptable; each would need to be justified on its merits. Non-designated assets can be identified through the planning application process.</p> <p>LBI consider Policy DH2 consistent with the NPPF.</p>

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		<p>Local group request a definition of undesignated heritage assets and suggest a blanket designation of all buildings built pre WWI or WWII.</p> <p>Landowner considers Policy DH2 contrary to the NPPF as it would unduly restrict development in proximity to Conservation Areas and listed buildings. Such proposals should be weighed against public benefit.</p> <p>Landowners request amendments are made to the language to ensure consistency and to match the statutory duty.</p> <p>Resident makes several comments including questioning why Part C is limited to Conservation Areas; and reference to assets and their setting, rather than the significance, needing to be conserved or enhanced.</p>	<p>Amendments will be made to Policy DH1 and DH2 including amendment of the language to ensure consistency and to match the statutory duty.</p> <p>The suggested approach re: extending Part C protections would effectively give conservation area status to the whole borough, depending on case-by-case assessment of contribution to an area. It is considered appropriate to consider cumulative limited positive contributions in conservation area as they are a defined spatial area. The contribution referred to is contribution to the CA. Some amends to wording are necessary in chapter 8 to align with common terminology, further to this response and other responses noted above.</p>
Policy DH3: Building heights	Landowners, Statutory Consultee, Local Groups, local Resident, Developers, local councillor	<p>GLA comment LBIs overall approach is in line with draft London Plan Policy D8. Where tall building sites are near the borough boundary engagement with neighbouring boroughs should be had. LBI should consider using the design review process to assess development proposals over 30m in height.</p> <p>Historic England welcome the definition of what constitutes a tall building in Islington and the reference to high quality design within clause F(v). HE suggest that achieving high quality design for any proposed tall buildings could be made more likely by specifying that the requirements of Policy DH3 taken as a whole represent the overall design quality that will be necessary to gain planning permission.</p> <p>A number of objections to the policy were received, both objections to allowing tall buildings at all, and objections to restricting the location of tall buildings. Several comments on the policy</p> <p>Local groups object to the policy. One group is opposed to tall building locations B1, B3, B4, B5, C1, C2, C5 and argue there should be a presumption against development over 10 storeys outside the CAZ. Another local group oppose the policy and request paragraph 3.1.5 of 2011 Core Strategy be retained (which states that tall buildings may be suitable in the south of the borough only).</p> <p>One landowner regards the 'blanket' restriction on building heights outside of allocated sites is too restrictive. Seven storeys are now commonplace in central London. More regard should be had to design quality and Parts A and B should be amended to provide sufficient flexibility to allow justified tall building proposals. This is echoed by another landowner who makes similar comments and suggests amendments to Part F to make the approach more flexible.</p> <p>City, University of London strongly object to Policy DH3 and find the evidence base insufficient and that the Northampton Square university campus which is over 30m high has not been acknowledged. Approach should be revisited and allow tall buildings where there would be public benefits and judged on a case by case basis. Respondent is concerned that their ability to enhance and expand its educational facilities at each</p>	<p>GLA comments noted. LBI have an ongoing dialogue with adjacent boroughs, and have had discussions on evidence base and emerging policy. Design review process is utilised for many sites not just tall buildings so it is not considered relevant to highlight in this policy.</p> <p>Additional wording will be added to DH3 supporting text to ensure, for avoidance of all doubt, that the locations identify suitability of TBs in principle and subsequent detailed assessment is necessary where proposal comes forward.</p> <p>LBI approach to identifying tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Locations identified are suitable in principle and any proposals will be subject to assessment against detailed criteria. It would be inappropriate to repeat text of existing policy which is based on old evidence.</p> <p>Policy DH3 requires exceptional design as one of the criteria but design alone cannot outweigh potential adverse impacts. A fully criteria based policy would not be consistent with the Draft London Plan.</p> <p>Re: issues raised by City, University of London, the response seems to suggest that, as the existing policy states that building heights should reflect local context, and that the local context included 30m+ buildings, that this would justify 30m+ buildings within the City University Campus, but this is clearly not the case. The 30m restriction applies in the current policy and any assessment of building heights against local context would not override this. The existence of tall buildings in a specific location cannot be used as justification for new ones. Policy DH3 is based on robust evidence which has considered the whole borough before focusing on several narrower areas of search after ruling out other areas due to evident constraints. The methodology is clearly set out in section 5 of the study; the entire CAZ was considered initially, but subsequently the majority of this area was ruled out, primarily due to views or conservation areas - see section 5.4 of the study.</p> <p>The TB study explains that the principle of proportionality should apply, whereby the height of tall buildings corresponds to the role and relative importance of the location in the local, wider Borough or Metropolitan Context. Regardless of this, 'proportionate and compatible' does not mean</p>

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		<p>of its campuses would unduly restricted by DH3 and this would impact upon the University's ability to compete with other leading universities.</p> <p>A developer considers Part F of the policy contradictory because how can a tall building be 'proportionate and compatible to their surroundings and the physical character of the area' when a tall building is defined as one that is of a height that exceeds surrounding building heights. The respondent considers that the variety of considerations taken into account in paragraph 8.3 means that 1 Elthorne Road should identified to be appropriate for a tall building</p> <p>Landowner welcomes the baseline study and its locational objectives. However, we consider that the assessment and identification of site specific locations potentially suitable for tall buildings is less robust, overly restrictive and could unnecessarily hinder potential development in the Borough. We suggest that proposals for tall buildings should be guided to the strategic search areas identified in the TBS and then scrutinised on a site by site basis through the planning application process and/or through more detailed site specific policy and/or guidance such as master plans or area action plans. They consider that the range of other policies relating to design and form of development would provide sufficient safeguards in any event and each site should be considered on its individual merits.</p> <p>Suggest proposed amendment to the current wording of the building heights policy to delete Parts A and B, and most of Part C, to highlight that buildings of more than 30 metres may potentially be acceptable within locations/key areas identified in the Local Plan, subject to site specific considerations, and only where they fully satisfy the criteria identified in Part F.</p> <p>Landowner also notes that designated views require a level of management appropriate to the potential impact on the viewer's ability to recognise and appreciate identified landmarks and heritage assets, and propose an amendment, which is in accordance with London Plan Policy 7.12, that states that new development should not harm and where possible should make a positive contribution to the characteristics and composition of designated views and their landmark elements.</p> <p>Landowner goes on to note concerns over the sieve analysis in the TB study, which they consider too broad and general to result in the robust identification of specific sites potentially suitable for tall buildings and lacks sufficient detail to discount such an extent of the Borough from being potentially suitable for tall buildings.</p> <p>The same landowner makes specific comment on restriction of tall building on allocations BC48 and BC50, and consider that the narrow definition of sites potentially suitable for tall buildings in the Central Activity Zone and City Fringe key area is excessively restrictive.</p> <p>Another landowner welcomes the baseline study and its locational objectives, which reflects the London Plan and HE guidance. The</p>	<p>that building heights must match existing heights exactly. The locations suitable for 30m+ buildings were identified through a comprehensive study that takes into consideration a variety of factors. The study concluded that this site is not one considered suitable in principle for a building over 30m.</p> <p>In response to the range of comments on the TB study methodology, the council considers that the Study is robust basis for the proposed approach set out in the draft Local Plan. This approach is consistent with the draft London Plan. We note that the GLA consider that draft policy DH3 is consistent with the draft London Plan.</p> <p>The suggestion that the policy could be relaxed and further guidance provided is not considered practical; we are reviewing the Local Plan now and consider that all relevant issues should be considered at this point, not deferred to further guidance.</p> <p>Views are unique and as such every opportunity should be taken to enhance where appropriate. Suggested amendment, purportedly to align with policy 7.12 of the London Plan, is not appropriate. It is again noted that the GLA consider DH3 is consistent with the draft London Plan.</p> <p>Re: TfL comment, Table 8.1 identifies TB locations and maximum building heights. It is not necessary to repeat every constraint which would apply, as they will be taken into account as part of assessment against other relevant policies. The allocation for this site, OIS21, refers to the Grade II listing.</p> <p>Reference to overshadowing added to criteria in response to Canal and River Trust.</p> <p>Policy DH3 has detailed criteria to assess impacts of tall buildings, including specific criterion F(iii) which adds further protection to heritage assets. There is also a criterion to assess impact on microclimate.</p> <p>Paragraph 8.41 notes that prevailing context is not informed by the highest existing heights in the area.</p> <p>The TB study provides a balanced discussion of the pros and cons of tall buildings. We note that it does not state that tall buildings provide the least dense housing (it is the opposite). The approach taken in the draft Local Plan is to identify sites suitable in principle for tall buildings, based on a detailed urban design analysis. If such sites come forward, they will be subject to detailed criteria set out in DH3, including consideration of safety and residential amenity.</p> <p>The TB study height maps do have a very limited number of anomalies with regard to the existing height maps, as a result of the datasets used. It would not be feasible to manually adjust the OS base for individual buildings given the size of the borough, nor is it considered necessary given the specific purpose which the height maps/diagrams are used for in this study. The height mapping is for strategic purposes only. It does not represent, and was not meant to be, a catalogue of actual building heights in storeys, which could only be established by detailed site surveys.</p>

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		<p>methodology and approach is generally supported. However, they consider the assessment and identification of site specific locations potentially suitable for tall buildings to be less robust, overly-restrictive and it could unnecessarily hinder potential development in the Borough and in doing so constitute a hurdle to meeting identified development needs. They suggest that proposals for tall buildings should be guided to the strategic search areas identified in the TBS and then scrutinised on a site-by-site basis through the planning application process and / or through more detailed site specific-policy and / or guidance such as master plans or area action plans, supported by further detailed studies undertaken in consultation with landowner.</p> <p>Landowner also notes concerns re: the sieve analysis which is based on simplified 3D models and not based on verified views; does not consider high quality design as a mitigating factor for taller buildings; and does not account for changes to sites within the local search areas over the plan period or infrastructure upgrades/ improvements. Therefore, the TBS does not allow sufficient flexibility to adapt to any changes that are likely to occur over the plan period, as required by paragraph 11 of the NPPF. Landowner considers locational guidance should be less precise, adopting a broad locational approach, for instance a circle with porous edges around areas identified as potentially suitable for tall buildings. The range of other policies and guidance relating to design and form of development (e.g. Islington Urban Design Guide SPG, Conservation Area Design Guidelines) would provide sufficient safeguards in any event and would enable any change to be sensitively managed. As is the approach in other London Boroughs, opportunities for refinement of potentially suitable locations for tall buildings could be undertaken through more site specific policy such as Area Action Plans and / or master plans / Supplementary Planning Guidance. Design codes may also be appropriated and, as per Draft Policy DH1, the council intends to develop design codes for some parts of the borough to provide clear design guidance for development in those areas.</p> <p>Same landowner suggests that designated views require a level of management appropriate to the potential impact on the viewer's ability to recognise and appreciate identified landmarks and heritage assets. Amendment proposed, in accordance with London Plan Policy 7.12, to require that new development should not harm and, where appropriate, should enhance the characteristics and composition of strategic and local views, and views to local landmarks</p> <p>One landowner welcomes the new approach for tall buildings. Another notes the provisions of policy DH3 but makes no specific comments.</p> <p>TfL note Caledonian Road Station (site allocation OIS21) is Grade II listed and would be unlikely to support a large scale development without demolition.</p>	<p>Importantly, it was not used to assess potential tall building locations or their height. In order to identify locations potentially suitable for tall buildings, a detailed analysis and characterisation study of areas of search was undertaken which was informed by desktop studies and site visits. The study uses 3d modelling to understand the impact and identify appropriate height of potential hypothetical tall buildings. As such the noted anomalies in the height plan are of limited relevance because they do not affect the recommendations made in the report; they would not attract material weight in a planning application.</p>

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		<p>The Canal and River Trust welcome the requirement to not adversely affect watercourses and waterbodies but are concerned there is not requirement to avoid impacts on overshadowing.</p> <p>Councillor comments that tall buildings can alter micro climates and should be banned from areas that would be sensitive to their impact, including: conservation areas, listed buildings, parks, green belt, world heritage sites etc. Similarly, several residents request account to be taken of the cumulative effect of the potential future high rise development, e.g. creation of wind tunnels. Paragraph 8.42 is insufficient to take account of these impacts.</p> <p>One resident notes that Part F(iv) must be rigorously enforced. Example of City North towers which resident states now raise the comparable building heights. Similarly, a local group note that in Archway the contextual height is three storeys and unless Islington is positively seeking tall buildings, it would be helpful for the issue of contextual height to require reference to the majority of surrounding buildings.</p> <p>Local group comment that mid-rise housing is more economical, safer, denser and sociable than high rise tower blocks and these should be favoured. They cite the TB study as evidence.</p> <p>The group identify some errors in the Tall Building Study building height maps. Concerned that as it could be used in planning applications it is important that that underlying evidence is correct.</p>	
Policy DH4: Basement development	Statutory Consultee, Local Groups, local councillor	<p>Two local groups support policy. One asks whether council will have sufficient resources to control basement development.</p> <p>Canal and River Trust express support for Part B. However, DH4 should be expanded to consider issues with over ground development such as Islington Tunnel or canal embankment as well as basement development.</p> <p>Local group note there is considerable underground water from the higher land in the north of the borough. Basements in the north of the borough therefore are not considered suitable given the potential impact if the flow is forced elsewhere.</p> <p>A local councillor considers that Islington should follow Lambeth's blanket ban on basements in residential areas due to the future increase of highly vulnerable places due to climate change. Two local groups similarly wish to see a blanket ban or a presumption in favour of no basement development.</p>	<p>Support noted. The council's approach to basements ensures that they are robustly assessed at application stage with requirements for sufficient information.</p> <p>Generally speaking, matters controlled under Building Regulations or other non-planning legislation, e.g. structural stability, drainage details, or party wall issues are not material planning considerations. Consideration of the Islington Tunnel in particular is highlighted in relevant site allocations near to the tunnel.</p> <p>The policy requires a Structural Method Statement prepared by qualified experts. Groundwater flows will be identified and considered as part of the application. A blanket ban in a particular area would not be appropriate as impacts will be identified on a case by case basis.</p> <p>The council cannot ban basement development outright, but it can put in place strong measures to ensure that basement development is properly assessed and that steps are taken to minimise the risks of basement development causing flooding. In their draft Local Plan (October 2018) Lambeth have proposed a similar approach to Islington whereby basements are permitted provided they can demonstrate that they do not cause harm.</p>
Policy DH5: Agent-of-change, noise and vibration	Statutory consultees, local residents, local business.	GLA, Sport England and Theatres Trust express their support for the policy.	Support is noted.

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		<p>Local residents suggest strengthening the policy, particularly with regard to light pollution and the imposition of measures to mitigate impacts.</p> <p>Local business welcomes the principle of the Agent of Change Policy contained in the draft plan, but considers that the policy does not go far enough in addressing the particular issues faced by existing businesses and operations which are considered to be existing noise generating activities. Request that Clause C and D be amended to reflect that the agent of change approach may be a developer trying to introduce a use into an existing environment, which needs to be mitigated to ensure that, once occupied, the owners or residential tenants are not adversely impacted by the existing operations. Existing established businesses need to ensure that they are allowed to continue to operate. They note that paragraph 8.66 reflects the principle about new noise sensitive developments in proximity to existing noise generating uses, but this needs to be written into the policy instead of supporting text in order to carry more weight.</p>	<p>Light pollution is addressed in policy DH5 and paragraph 8.71 identifies light spill as an adverse impact that offices have on nearby residential use. Policy DH3, paragraph 8.42 requires impacts including light pollution to be considered re: tall buildings. Clarification will be provided in DH5 supporting text re: measures to mitigate impacts.</p> <p>The current policy wording is considered appropriate to address concerns raised by local business. Further clarification will be added to supporting text in response to comments.</p>
Policy DH6: Advertisements	Business, local group and resident.	<p>Business expresses support for Part B and the proactive approach to shroud advertisements and offer their manifesto to demonstrate commercial approaches to shroud advertising.</p> <p>A local group support the policy but have concern about having enough resources to carry out effective compliance. It is noted that there is no need for phone box advertising.</p> <p>Resident questions why deemed consent provides rights to retain a sale board after property has been sold. This needs to be addressed to prevent a proliferation of boards.</p>	<p>Support is noted however; it is unlikely that any changes to the policy are necessary.</p> <p>Deemed consent matter covered by advertising regulations. Controls on advertisements which benefit from deemed consent generally need agreement by the SoS.</p>
Policy DH7: Shopfronts	Local group and resident	<p>Support expressed for this policy. Suggestion that the policy should be extended to include provisions of policy DH6 (i) and (ii) as regards to flashing illumination and visual intrusion.</p>	<p>Detailed guidance on shopfront design is included in the Urban Design SPD. This would apply to applications.</p>
Policy DH8: Public art	Local groups	<p>Support expressed for public art but this should always be developed in consultation with the local community and supporting local artists.</p>	<p>Support is noted. Policy already includes criterion requiring community engagement. However, there is no planning justification for prioritising local artists.</p>
Policy ST1: Infrastructure Planning and Smarter City Approach	Statutory consultees, Local groups, resident.	<p>Two of the local groups express their support for the policy and Sport England welcomes that CIL and Planning Obligations would be used to deliver infrastructure.</p> <p>Local group requested the policy include walking and cycling routes as infrastructure.</p> <p>The Canal and River Trust noted the lack of an updated Infrastructure Delivery Plan and welcome engagement with the council over enhancing the canal network.</p> <p>DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure. In addition to the need to secure developer contributions towards supporting social infrastructure (including schools), it would be useful if the plan could highlight the need to phase the delivery of new housing and supporting infrastructure to ensure that the latter is delivered when required to meet need.</p>	<p>Walking and cycling infrastructure is included and 'infrastructure' will be defined in the glossary.</p> <p>The Council will contact the Canal and River Trust as part of the IDP update. The IDP will be published alongside next plan iteration.</p> <p>We acknowledge the comment re: phasing but Islington has so few large sites remaining that there is low possibility of any significant phasing. Holloway Prison Site SPD has a community infrastructure phasing requirement. Site allocation NH7 will add reference to this in development considerations. It is not necessary to repeat national policy.</p>

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Policy ST2: Waste	Local group	Local group support policy	Support is noted.
Policy ST3: Telecommunications, communications and utilities equipment	Statutory consultee (TfL), Local groups (Cycle Islington, Highbury Community Association)	<p>TfL request stronger wording of the policy. Point A should be amended to state that they will be frequently used for their primary purpose, communications, by a large number of people in order to make best use of valuable public space; and that they do not include advertising or lighting that would cause a detraction/danger to motorists, cyclists and pedestrians.</p> <p>Cycle Islington comment that utility infrastructure should only be placed on the street if it is completely unavoidable. Additionally, new utility boxes need to take account of future cycle tracks to avoid expensive re-location and disruption.</p> <p>Local group comment it is essential that equipment is only permitted in the settings listed.</p>	<p>Amendment will be made in relation to second proposal, although already partly covered in policy DH6. It is not clear in relation the first proposal how planning can require frequent use by a large number of people.</p> <p>Islington's Streetbook SPD covers this. Other policies e.g. T4 would apply to mitigate adverse impacts.</p>
Policy ST4: Water infrastructure	Statutory Consultees	<p>Thames Water support Policy ST4. However, in light of changes to Thames Water connection charges, they now recommend that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) and request that Policy ST4 and its supporting text is amended to reflect this. Suggested policy wording and supporting text provided. They also request that the Policy title is amended to 'Water and Wastewater infrastructure' as the Policy relates to both elements and at present is misleading</p> <p>The Environment Agency welcome the awareness of the potential capacity issues facing water infrastructure in the borough and strongly recommend including in this policy that early contact with infrastructure providers, in this case Thames Water, should be made to ensure there is capacity for foul drainage, and sewerage treatment to accommodate future growth and development. Starting this conversation as early as possible will allow Thames Water to plan effectively, and prevent issues being raised too late down the line to address appropriately. In this way adverse effects on the water environment can be prevented.</p>	Both Thames Water suggested amendments made, which also satisfies EA response.
Appendix 1: Marketing and vacancy criteria	No comments received	N/A	N/A
Appendix 2: Noise and vibration	No comments received	N/A	N/A
Appendix 3: Transport Assessments and Travel Plans	TfL	Reference in the plan should be made to TfL's design documents and standards for all of the TfL Road Network. To ensure references are up to date more generic language should be used such as 'TfL's latest online guidance'. The section on 'Full Travel Plans/Local Level Travel Plan including table A3.2 should be removed. Travel Plans are supported in principle but are not acting as the key management tool for implementing any transport solutions highlighted by the Transport Assessment. Local Plans should acknowledge travel plans require improvement and refer applicants to TfL website in early 2020.	Amendments involving generic language will be made. Council does not agree with full removal of travel plans as they are a positive tool in principle but will amend wording to relate to TfL travel plan guidance. Council will possibly also introduce reference to alternative mechanisms to address identified transport impacts including where it reflects new TfL approach and is not considered to be inferior to travel plan requirements.
Appendix 4: Cycle parking standards	TfL	Comment that minimum cycle parking standards should also set out requirements for short stay cycle parking. If minimum cycle parking standards are amended into minimum floor space requirements rather than per sqm these should be equivalent to the draft London Plan	Amend to include short stay parking into the standard. Suggestion on minimum floorspace approach noted; the move to a spatial requirement is aimed at improving the quality of spaces, so provision may not be equitable to London Plan standards.

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General comments	Residents, Statutory consultee, Local and regional Groups/organisations, Landowners, local business, housing association, residents association, Camden and Islington Public Health	<p>standards and separated into long and short stay minimum parking requirements.</p> <p>A number of respondents express general support for the overall approach in the Local Plan, and for specific policy areas.</p> <p>The GLAs response confirms that the Mayor supports the general approach taken by Islington; and welcomes the overall approach to growth and development in Islington's Draft Local Plan and considers that on the whole the plan is positive and, as drafted, is in general conformity with the London Plan.</p> <p>Resident queries council's ability to create new bus routes.</p> <p>Sport England comment the Area Spatial Strategies are silent on improving health and wellbeing and sport/recreation provision. Active design could also be included within these policies which would highlight the importance of these issues.</p> <p>Resident considers the number of plans, poor standards on notations and version control and the physical size (both file size and printed size) of documents makes it very hard for non-professionals to understand plans and their potential negative impacts. Suggests developers conduct more meaningful public consultation with public events to share and explain plans and ongoing consultations with the local community during the planning application process, particularly if there are revised plans. Planning team could be expanded to provide a 'residents' champion' to represent residents' point of views in discussion with developers, based on known issues. Respondent notes a number of failed consultation processes where proper consultation hasn't taken place and as a result made changes that have negatively impacted them. Resident also comments on lack of availability of hard copies of plan documents during consultation; and use of jargon and language difficult to understand.</p> <p>Resident terrified and appalled with LBIs attitude to preserving green space and trees and considers that the council's actions have been socially shocking and damaging to people who live in Islington.</p> <p>TfL is broadly supportive of your Local Plan policies which are aligned with TfL's goals, aspirations and relevant draft London Plan policy. This will not only embed the Healthy Streets Approach into local policy, but will also enable active travel and public transport to become the primary way to travel.</p> <p>Several residents hope the draft Local Plan policies relating to environmental sustainability will be put into practice and will lead to real change and makes the point that the gradual pace of change in terms of the environmental crisis and the required mitigation and adaptation responses should not mean that their extreme nature is underestimated. Not only should green issues be incorporated in the finished product, but also be a vital part in the demolition and construction of the buildings in question.</p>	<p>Council has no control over bus routes.</p> <p>The spatial areas are identified because they are considered the area's most likely to accommodate growth in future; they are not just a translation of all policies for each area. As noted, sports/activity is an objective that runs through the plan, and there is policy to protect existing and promote new sports provision. The updated evidence base has not identified any specific need for new facilities in these areas.</p> <p>The vast majority of people view plans electronically. It would not be prudent to undertake extensive printing for each application. Regardless, this is not something that the Local Plan can directly influence, although it does encourage engagement with communities, e.g. in policy PLAN1. The Local Plan has been drafted to be as clear and accessible as possible in terms of language used, but use of jargon and technical terms is unavoidable that a technical subject such as planning policy. Unclear if respondent refers to past actions or draft plan. Draft Local Plan sets out strong protection to green infrastructure.</p> <p>It is unclear if the respondent is referring to past actions and/or the proposed Local Plan policies. The Local Plan sets out a strategic approach to green infrastructure which affords strong protection to, inter alia, green areas and trees.</p> <p>The draft Local Plan sets out strong, comprehensive policies relating to sustainable design. Several policies have been strengthened in comparison to the current Local Plan, including policies relating to maximising energy efficiency and mitigating flood risk. Once adopted, the policies relating to environmental sustainability outlined in the draft Local Plan will become requirements in relation to all relevant planning applications. The council takes the extreme nature of climate change very seriously and is committed to ensuring that Islington's contribution to climate change is reduced as far as possible. The role of development and the planning process in mitigating and adapting to climate change are taken very seriously and are a central concern of the plan.</p> <p>The scale of development sites, both individually and cumulatively, is not considered to be at a level that would cause impacts on the M1. The next iteration of the site allocations will include indicative capacity figures which should enable an informed decision about likely transport impacts. We also note that Islington operates a car-free policy for all development, which will serve to reduce the number of cars and car usage from new developments. We will add reference to Highways England and the SRN to ST1 supporting text.</p> <p>Islington has significant projected development needs for housing, employment and other uses which it must meet. The Local Plan sets out how these needs will be met and puts in place a range of policies to deliver high quality development, ensuring that adverse effects of development are</p>

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		<p>Housing association notes that their aims to provide good quality, affordable and sustainable housing are closely aligned with the similar aims set out in the emerging Local Plan.</p> <p>Highways England note there is a high level of development proposed within this Local Plan and it should be ensured that the transport evidence base for the Local Plan; following this review, provides indication as to what the residual impacts of the development would be on the Strategic Road Network (i.e. the M1). It is noted that Highways England and the SRN have not been referenced within the Local Plan document. Highways England should be consulted on any development that may have an impact on the M1</p> <p>Resident objects to further intensification of development in Finsbury Park.</p> <p>Resident requests well designed waste collection points for households along Caledonian Road.</p> <p>Department for Education note that any site allocations that include schools should seek to clarify requirements for the delivery of these schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. These site specific policy requirements need to be set out clearly, informed by robust evidence of infrastructure need, so that they can be accurately accounted for in the viability assessment of the local plan (to ensure that the total cumulative cost of all relevant policies will not undermine deliverability of the plan), and in the price paid for land by developers and other parties. DoE also note routes available to establishing new schools.</p> <p>Members of residents association in Highbury area feel very strongly that the diverse range of land uses in Highbury, which has long been a significant feature of the area should be maintained so far as possible, and that residential development (which we absolutely accept is necessary) should be balanced with employment use and appropriate facilities and amenities such as health centres. They wish to resist further "suburbanisation" of the area, resulting in residents having to travel to access work, services or (for example) affordable studio/workshop space. A number of such sites have been lost in the recent past.</p> <p>Resident would like to see further air pollution policies detailed in the plan with a more robust approach to reducing it across the borough to below legal limits.</p> <p>Resident considers that new developments should use green energy only, and should have larger planting schemes on roofs and designated green areas. A think tank could resolve the issue how all developments attain zero carbon status.</p>	<p>mitigated or prevented and that appropriate infrastructure is provided. In principle Finsbury Park can accommodate further development.</p> <p>Waste collection points is not an issue that can be addressed in the Local Plan, although it is noted that various Local Plan policies, including policy T4, would seek to mitigate impacts, obstructions, etc. for users of the public realm. Such initiatives could be taken forward through other means, including spending of CIL/S106 funding where considered appropriate through the proper mechanisms.</p> <p>The borough is updating its Infrastructure Delivery Plan which will help support the Local Plan. This includes an assessment of need from the school place planning team which concludes that the borough now has sufficient capacity for the foreseeable future (2028/29) based on current data. No specific allocations will be required.</p> <p>Support noted for maintaining a balance of uses in the Highbury area. The draft plan has policies to promote and protect various uses, and supports the principle of mixed and balanced communities.</p> <p>The Local Plan air quality policies, particularly S7, have been informed by Islington's Air Quality Action Plan and are in accordance with the draft New London Plan policies, and as such the council believes the policies are sufficiently robust.</p> <p>The draft plan has a number of policies covering sustainable design including renewable energy; and also strongly promotes green infrastructure. Focus of think tank research is outside the scope of the Local Plan, or indeed the council itself.</p> <p>Public Health comments noted. Aspects of the HIA will be used to inform the Integrated Impact Assessment of the Local Plan.</p> <p>Re: comments from local group on building lifespan, an additional requirement has been added to Part D of Policy S10 to require the Adaptive Design Strategy to include the overall 'design life' of the buildings in the development. In addition to the other requirements of this policy, this will help to ensure that buildings are constructed to have longer lives.</p> <p>Draft Local Plan has a number of policies that require consideration of local residents and businesses.</p> <p>It is not possible to ban petrol stations, car dealerships and other such businesses. However, any application will be assessed against policies that include optimising development and minimising non sustainable modes.</p> <p>We will look to streamline use of terms where relevant.</p> <p>Reference to Neighbourhood Planning will be added. Clear identification of strategic and non-strategic policies and site allocations will be set out in the next iteration of the Local Plan. The council considers the SCI is up-to-date and that it (along with the NP guide) sets out how we will advise and assist</p>

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		<p>The Camden and Islington Public Health response, which takes the form of a Health Impact Assessment, has assessed the draft Local Plan against the wider determinants of health: environmental factors that impact on everybody's health and wellbeing. Overall, the Health Impact Assessment concludes that the policies in the draft Local Plan support health improvement and, importantly, underpin the Council's vision in tackling inequalities, including health inequalities, in the borough.</p> <p>Local group suggest a reference be added to Policy S3 that buildings should have a lifespan of at least 75 years.</p> <p>Local resident considers that appropriate thought should go into the planning stage with regard to the surrounding local neighbourhoods, and financial support be considered to local businesses adversely impacted by any construction works.</p> <p>Resident and local group request uses such as petrol stations and car dealerships that lead to fossil fuel consumption should not be allowed.</p> <p>Local business and resident ask for clarity on consistency of various terms throughout the Local Plan.</p> <p>Neighbourhood Planners.London notes that Local Plan should explain, in language the public can understand, the opportunities that neighbourhood planning provides for local communities to shape the future of their area, as set out in the NPPF. They also note NPPF requirement to specify strategic and non-strategic policies; and suggest that the Council needs to undertake a further update of its SCI document following changes to legislation. Several local residents endorse Neighbourhood Planners.London response.</p> <p>Local group suggest in regards to the local economy there is less emphasis on it always being best for residents to work in the borough. Acknowledgement should be made that Islington is the most densely populated borough in the country.</p> <p>Local group strongly emphasise the need to reduce parking, and improve the public realm. CIL/S106 should be earmarked for public realm improvements; and note that wheelchair access must not only be to homes but to all streets.</p> <p>Resident suggests including Hornsey Road in the Nags Head or Finsbury Park spatial strategy areas is appropriate to support the retail uses here.</p> <p>Local group highlight the London Borough Development Group's recommendation in line with the Mayor's Affordable Housing and Viability SPG that development viability should be assessed on the basis of land values based on "Existing Use Plus Premium." They support the recommendation of the London Forum that Site Allocations should include the LPA's own viability assessment in this basis and understand that this has been adopted by some councils.</p>	<p>local groups who wish to develop a NP. This is in accordance with Schedule A2 of the Planning and Compulsory Purchase Act. The council intends to update the guide periodically to reflect changes in policy context and guidance.</p> <p>Planning cannot mandate local or non-local employment. We recognise Islington's role as an employment centre for residents and non-residents. It is appropriate to promote local job creation as this can have knock-on benefits which help to address a range of plan priorities, including reduction of inequalities.</p> <p>Allocation of general S106 and CIL monies is outwith of the plan. The area spatial strategies identify a number of such potential improvements which could inform any future spending decisions. Proposals to remodel the public realm must be in accordance with the Streetbook SPD which focuses heavily on accessibility and disabled access. Policy T4 would also apply.</p> <p>The spatial strategy areas are those locations where growth and change is expected to occur. We consider that the opportunities on Hornsey Road are not conducive to growth and change at the same scale as the areas identified.</p> <p>In terms of obtaining a Benchmark Land Value for a site, the Council considers that the 'Existing Use Value Plus Premium' approach is the most conducive approach to achieving the goals of the Planning System and realising sustainable development. The Council considers that the 'Existing Use Value Plus Premium' approach should form the primary basis to establishing a Benchmark land Value, which is supported in regional and national policy. The comments in respect to the recommendation that Site Allocations should contain the Council's determined 'Existing Use Value Plus Premium' based Benchmark Land Values are noted. However, such an approach would be highly resource intensive and could not account for changes in site Existing Use Values over the course of the lifetime of the Plan; for example, some sites may not come forward for a number of years, and consequently their Existing Use Values would alter due to macro-economic changes as well as potential changes in their condition. The Council's Regulation 18 Draft Local Plan's policies have undergone area-wide viability testing utilising Existing Use Value Plus based Benchmark Land Values for each site included in the study.</p> <p>The council initially consulted for 8 weeks (2 more than the statutory minimum, to cover the Christmas period). We subsequently extended the deadline for over a week to allow for late comments. We also ran drop-in sessions at the start and end of the consultation period, and publicised the consultation extensively. We consider this was more than sufficient to allow for a full range of comments to be received.</p> <p>Planning applications would need to address every policy in line with legislation. Cross references are included at various points to highlight other policies, but this does not heighten the weight of these policies. The council will review use of cross-references in the plan. The council will consider additional wording in relevant policies to clarify that cross</p>

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		<p>Resident suggests the consultation period should have been extended as it ran over Christmas, to allow more discussion and engagement from the public.</p> <p>Resident notes that plan should add cross references to ensure compliance with other policies where relevant; and notes that there is inadequate reference within the policies to development that abuts or is close to borough boundaries. This is relevant to all policies as otherwise communities at or that straddle a borough boundary could be adversely affected. All aspects of the Local Plan should address the issues of mitigating adverse impacts on neighbouring boroughs.</p> <p>Resident asks that explanation is given as to the criteria why some policies and following explanatory paragraphs are mandatory designated by the term 'must' and others are advisory designated by the term 'should'.</p> <p>Resident also notes that there needs to be a requirement for and monitoring of appropriate and robust facilities management in business and residential developments where there are communal facilities to "prevent adverse amenity impacts on the surrounding area" (wording as in paragraph 3.131) e.g. light pollution from communal stairways with windows overlooking neighbouring properties and the excessive light as business premises are cleaned often late at night and in the early morning.</p> <p>Landowner note that the draft Local Plan viability study was publicised well after the start of the consultation period. This would appear to render this element of the consultation flawed, and this would need to be rectified. They note that they have not seen the appraisals of Appendix 2 and 3. They express concern that the scale of development envisaged for the Sainsbury's site (AUS6) to deliver 29,788m² (GIA) does not optimise the true capacity of the site, or the objectively assessed needs for the borough. It would broadly equate to a 4 storey development. AUS6 is located in a Major Town Centre, CAZ (fringe) with PTAL 6, in a borough with a significant undersupply of developable land, and with acute housing and commercial needs. The site is adjacent to a safeguard Crossrail 2 station and is outside a conservation area, does not contain listed buildings and is a strategic location for housing. Such an approach would conflict with national and regional policy. Given the location of the Islington Tunnel, innovative and possibly expensive ground solutions will be required to deliver the policy objectives for the site. This should be recognised in the site allocation AUS6.</p>	<p>boundary impacts need to be taken into account. This may be general wording and/or within specific policies. It is noted that the council is undertaking ongoing duty to cooperate work with all adjacent boroughs.</p> <p>Council note that the interchangeable use of 'must' and 'should' may cause confusion, hence we will look to streamline the use of the terms and provide consistency.</p> <p>Amenity impacts are covered by a range of policies including DH5. Planning conditions can be imposed on applications to ensure compliance with any agreed measures to mitigate potential impacts.</p> <p>Re: landowner comments about availability of viability evidence, the consultation is fully consistent with statutory requirements. Regulation 18 consultations have no required form and can range from very broad questions on scope to de facto Regulation 19 documents with fully drafted detailed policies. There is no requirement for viability evidence to be published at Regulation 18 stage. The council acknowledged at the outset of the consultation that further documents may be published; the draft viability report was available for comment for around half of the consultation period, and remains available ahead of the next round of consultation.</p> <p>The respondent identifies the 'Site 9' typology used in the Council's Local Plan Viability Study (December 2018) as the AUS6 Site Allocation; and states that the AUS6 site would if developed incur development costs relating to site specific abnormal costs, and appears to suggest that such costs should be factored into the viability assessment of the 'Site 9' typology. However, whilst the viability assessment of the 'Site 9' typology within the wider Local Plan Viability Study was based upon the site designated as AUS6 in the Council's Site Allocations, it does not constitute a site specific viability assessment of that site. A site specific viability assessment differs from an area wide viability assessment. A site specific viability assessment would (if site specific constraints warrant one to be conducted) form part of the consideration of a planning application; whilst an area wide viability assessment relies upon the viability testing of development 'typologies' to test emerging policies at the Plan-making stage.</p> <p>It should be noted that Site 9 is a 'typology' forming part of the Council's area wide Local Plan Viability Study. The Local Plan Viability Study has been undertaken using 'typologies' which reflect the type of development envisaged to come forward during the lifetime of the emerging Plan, with the use of these 'typologies' enabling the Council's emerging policies to be viability tested.</p> <p>Whilst the majority of typologies used in the Local Plan Viability were based on Site Allocations, it should not be construed that the adopted typologies, and the viability testing of them, constitute the actual quantum of development expected on these sites and site specific viability assessments. The actual acceptable quantum of development would arise from engagement with the LPA and through submission of a planning</p>

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Site Allocations			
KC1: King's Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	Statutory Consultee, landowner, local business.	<p>Local business request reference to be made to concrete batching plant to the east of the site in the Development Considerations and refer to the Agent of Change policy to limit impacts of development on future operation of the concrete batching plant.</p> <p>Thames Water highlight the water network capacity in this area may not be able to support demand and upgrades to water infrastructure may be required. Also note waste water infrastructure is managed by a different company.</p> <p>Landowner, HS1 agree it is unlikely the northern part of the site will come forward for development due to the need to maintain the operational railway, although aspiration for redevelopment is welcomed.</p>	<p>application. This is noted in the Viability Study (December 2018) at paragraph 2.4.</p> <p>Not considered appropriate to use development considerations to protect a specific named business. Policy DH5 would offer strong protection without reference in site allocation.</p> <p>Additional text will be included in the development considerations in response to Thames Water comments.</p>
KC2: 176-178 York Way, N1 0AZ	Statutory consultee, Landowner, resident, local business	<p>A resident requests the site should be extended to include the diagonal residential block in the south. This would allow for the original alignment of Bingfield Street to be restored and maximise permeability in line with Policy SP2.</p> <p>Local business request reference to be made to concrete batching plant to the east of the site in the Development Considerations and refer to the Agent of Change policy to limit impacts of development on future operation of the concrete batching plant.</p> <p>Thames Water note that upgrades to the water network and wastewater treatment works may be necessary. Early liaison with Thames water is necessary.</p> <p>A landowner gives an update on the development of the site with construction delays having taken place.</p>	<p>The pedestrian and cycle routes are indicative. Inclusion of block to the south is not considered appropriate nor necessary. Policy SP2 both promote land assembly with adjacent sites where feasible.</p> <p>Not considered appropriate to use development considerations to protect a specific named business. Policy DH5 would offer strong protection without reference in site allocation.</p> <p>Additional text will be included in the development considerations in response to Thames Water comments.</p> <p>Update on development status noted. Where sites have been identified as being suitable for tall buildings, the location/siting of the taller element is specified. A tall building designation does not mean a tall building will be permitted as it would have to accord with Policy DH3. A comprehensive scheme would better realise development potential but this does not preclude schemes coming forward on a piecemeal basis.</p>
KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1	Statutory Consultees, Residents and a landowner.	<p>Canal and River Trust welcome reference to engagement with them but request a slight word change to the development considerations to increase its comprehensiveness.</p> <p>Thames Water note that upgrades to the water network and wastewater treatment works may be necessary. Early liaison with Thames water is necessary.</p> <p>Landowner support the allocation however reject the reference to 'limited' intensification citing inconsistency with London Plan and Local Plan policy B2 which seeks new B1 floorspace to be maximised. Respondent also objects to commercial uses at ground floor being 'small scale' as there is limited retail in the immediate vicinity. Objection to development considerations also made because these are addressed in other policies so should be deleted.</p>	<p>Amendments will be made re: Canal and River Trust and Thames Water comments.</p> <p>Support for allocation noted. LBI consider there to be limited development potential due to designated heritage assets; building heights need to be in line with existing. Policy B2 needs to also be considered against other design and heritage policies. Site is within a PEL and CAZ so small scale commercial floor space may be acceptable where it is ancillary to the predominant business function. LBI finds the term 'small scale' appropriate for the site's circumstances. The development considerations are considered appropriate.</p> <p>Current allocation and policy wording would ensure adverse impacts of residents are mitigated/prevented.</p>

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Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
		<p>Resident requests wording to be added regarding amenity of neighbouring residential properties to the north of the Regent's canal at Treaty Street</p> <p>Two residents welcome the reference to amenity of neighbouring sites.</p>	
KC4: Former York Road Station, 172-174 York Way	TfL City Planning, TfL Commercial Development, Resident, Business,	<p>TfL City Planning as a statutory consultee are not progressing York Road Station reopening and it hosting the Piccadilly Line, therefore this allocation should be removed.</p> <p>A resident, business and landowner all support the allocation. The resident wants to see the site extended into the parking area facing York Way; the business want the building to be used as a cultural venue and not housing if the station does not open; the landowner would like to see residential development above the station.</p>	<p>Reference to Piccadilly line will be removed.</p> <p>The parking area to the south of the site is part of the residential estate and is in separate ownership to the former station site. Extending the boundary here is not considered appropriate nor necessary; the allocation and policy SP2 (para 2.18) both promote land assembly with adjacent sites, where feasible.</p> <p>Cultural/entertainment uses are generally directed to the CAZ or Town Centres making this location inappropriate. An element of residential may be suitable but demand for business floor space warrants a business-led development.</p>
KC5: Belle Isle Frontage, land on the east side of York Way	Landowner, local business	<p>Local business object to the suggestion a tall building could integrate the Maiden Lane tower into the skyline.</p> <p>Landowner welcomes inclusion of the site but disagree with the allocation for solely office development as the prevailing character is residential and a mixed use scheme would be more appropriate. The railway lines serve often infrequent, low speed trains so the noise generated would be suitable for residential development. Office development this far north of King's Cross may not be lettable.</p>	<p>Sites identified as suitable in principle for tall buildings has been informed by detailed evidence but proposals must adhere to detailed criteria in policy DH3. There is balance between maximising floor space and protecting character.</p> <p>Support is noted. Office floor space is an evidenced need and LBI consider the site's location near King's Cross station and the CAZ provides a strong basis for business use. The site could act to denote the end of the King's Cross cluster and start of the industrial uses to the north.</p>
KC6: 8 All Saints Street, N1 9RJ	Statutory consultee, Landowner and a resident.	<p>Canal and River Trust welcome reference to engagement with them but request a slight word change to the development considerations to increase its comprehensiveness.</p> <p>Landowner suggests amending site boundary to include adjacent Bacta House. If this is not considered appropriate, then Bacta House should be referenced within the Development Considerations for future development potential. Small intensification of business use at both buildings would make a small contribution to B1 floor space.</p> <p>Resident requests wording to be added regarding amenity of neighbouring residential properties to the north of the Regent's canal at Treaty Street</p>	<p>Wording will be amended accordingly.</p> <p>LBI do not consider the boundary should be amended because Bacta House is Locally Listed therefore development capacity will be extremely limited.</p> <p>Current allocation wording and other policies sufficiently ensure adverse impacts on nearby residents are mitigated/prevented.</p>
KC7: All Saints Triangle, Caledonian Rd, Kings Cross, London N1 9RR	Resident	Allocation is supported but Caledonian Road elevation should have retail/active uses to link retail frontages to the north of the canal.	Support noted. Site is within a Priority Employment Location and not in a Town Centre or Local Shopping Area so business uses are the priority.
VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way, N7 9AX	Statutory Consultee, Landowners, local landowner/business	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>Local landowner/business welcomes the five storey height limit. Notes extreme concern about the height and density of the building proposed in application P2015/1204/FUL. If built, this block of offices and storage</p>	<p>Additional text will be included in development considerations in response to Thames Water.</p> <p>Support for height restrictions noted.</p> <p>Part C of Policy SP3 clarifies what would constitute suitable hybrid space within the LSIS. Proposals will be assessed on a case by case basis but the council will set out a skeleton definition in the glossary. Height restrictions are supported by evidence.</p>

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		<p>units would have a very real impact on our quality of life here at the studio and we welcome a five storey limit to any development on this site.</p> <p>Landowner supports explicit reference to B8 uses but it is unclear whether proposals combining B8 use space supplemented by B1a space would be acceptable and whether they would constitute hybrid space. Respondent strongly objects to the height restriction, which they consider to be entirely unjustified and would severely restrict the ability of the area to contribute to the economic well-being of the Borough and represent a lost opportunity to secure more sustainable use of land.</p> <p>Another landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to landowner objection.</p>
VR2: 230-238 York Way, N7 9AG	Landowners, Local landowner, business	<p>Landowners consider the allocation is too restrictive. The LSIS has a mix of business activities which warrants a flexible approach which seeks to minimise loss of general industrial floor space but allows the best and most efficient use of land. The ELS promotes intensification of industrial uses through hybrid spaces. Protection of industrial uses without flexibility in contrary to the ELS findings and London Mayor's objectives.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>Allocation is in line with LSIS designation that is based on a detailed evidence base. The GLA response supports the council's approach for the LSIS. The ELS notes the primary use of the LSIS is industrial and LBI rejects the claim there has been a fundamental shift to B1 uses here. A restrictive approach is needed to safeguard the most significant remaining industrial land in the borough. Height restrictions are supported by evidence.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR3: Tileyard Studios, Tileyard Road, N7 9AH	Local landowner	<p>Landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to landowner objection.</p>
VR4: 20 Tileyard Road, N7 9AH	Local landowner	<p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR5: 4 Brandon Road, N7 9AA	Local landowner, business	<p>Business looking to locate in the LSIS provide an update on the status of the site. Business has made proposal for B8 use but believe that landowner is pursuing possibility of tall office building. Business notes that the existing vacancy rates demonstrate there is a high demand for industrial use for the property.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>Update on site status noted. Maintaining industrial uses is a key priority. The LSIS should retain and intensify B1c, B2, B8 uses and should be in line with building height guidance which stipulates these should not exceed 5 storeys. Development of B1a will only be suitable as part of hybrid space.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>

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VR6: The Fitzpatrick Building, 188 York Way, N7 9AD	Statutory consultee, local landowner	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>TfL note that the text on 'site designations and constraints' incorrectly indicates that the allocation is close to or within the Crossrail 2 safeguarding area. This should be removed.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>Additional text will be included in development considerations in response to Thames Water.</p> <p>Site designations and constraints will be amended in line with TfL comments.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR7: 43-53 Brewery Road, N7 9QH	Local landowner	<p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR8: 55-61 Brewery Road, N7 9QH	Statutory consultee, local landowner	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>Additional text will be included in development considerations in response to Thames Water.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR9: Rebond House, 98-124 Brewery Road, N7 9BG	Statutory consultee, Landowner, local landowner	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required.</p> <p>Landowner has no objections to the allocation in principle.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>Additional text will be included in development considerations in response to Thames Water.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>
VR10: 34 Brandon Road, London N7 9AA	Landowner, Local landowner	<p>Landowner considers office/studio uses are more suitable for the site as there are difficulties with servicing industrial uses.</p> <p>Local landowner strongly objects to site allocation, linked to the proposed policy framework for Vale Royal / Brewery Road area as set out in Draft Policies SP3, B1 and B2. No specific comments on the allocation but do provide detailed comments on policies B1, B2 and SP3 which are relevant to the objection to this allocation.</p>	<p>The preference for office / studio use on this site as a result of poor delivery restrictions is not justified. Maintaining industrial uses within the Borough is a key priority, such uses play an important role in supporting both the local and London-wide economies. Office development could seriously harm the area's primary economic function and could lead to the deterioration and gradual loss of industrial use in this area. The introduction of B1 space may be permitted, when provided as part of a hybrid workspace scheme.</p> <p>The council's response to comments on SDM policies B1, B2 and SP3 are relevant to local landowner objection.</p>

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AUS1: 65-70 White Lion Street, N1 9PP	Statutory consultees, Business Improvement District	<p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water note upgrades to wastewater treatment works will be needed to support development and early engagement should happen to agree a housing phasing plan. However, water supply capability is not an issue here.</p> <p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p> <p>Business Improvement District recommend removal of site due to it being under construction.</p>	Site will be removed as nearly complete.
AUS2: Pride Court, 80-82 White Lion Street, N1 9PF	Statutory Consultee, Business Improvement District	<p>TfL suggest the reduction in local travel from Crossrail 2 should feature in the 'allocation and justification' and transport and capacity improvement should be optimised on this site.</p> <p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>BID suggest adding reference to relevant planning application and using refusal reasons of previous app to inform development considerations.</p>	<p>Site is considered appropriate for business floor space, given existing use and context of White Lion Street.</p> <p>Amendments made in response to Canal and River Trust.</p> <p>Reference to further application reference also considered unnecessary; other applications are referred to demonstrate how site was identified and a further reference does not add anything further to this, especially as it has not been determined at the time of writing. Planning application refusal reasons do not automatically equate to development considerations, not least because they relate to the policies of adopted Local Plan</p>
AUS3: Electricity substation, 84-89 White Lion Street, N1 9PF	Statutory Consultees, Landowner, Business Improvement District	<p>TfL comment residential uses can support business and town centre uses and provide sustainable land use mixes with high accessibility. This should be acknowledged.</p> <p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Landowner comments residential, hotel, student accommodation may be more valuable and compatible with ground floor retail than business use. There is no reference to the height of the prospective development.</p> <p>BID comment that site is greater than "Electricity Substation". The Substation does not identify the site. Presence of the Electricity Substation is a Site Constraint.</p>	<p>Site is considered appropriate for business floorspace, given context of White Lion Street.</p> <p>Amendments made in response to Canal and River Trust.</p> <p>LBI evidence identifies significant need for office space and Angel is a prime location for this. The tall building study did not identify this site as appropriate for a tall building.</p> <p>The name does not determine the extent of the site; this is clear from the site plan. However, the presence of the substation will be added as a development constraint.</p>
AUS4: Land at 90-92 White Lion Street, N1 9PF	Statutory consultee, Business Improvement District	<p>TfL suggest the reduction in local travel from Crossrail 2 should feature in the 'allocation and justification' and transport and capacity improvement should be optimised on this site.</p> <p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>BID suggest updating considerations to reflect current status of extant application.</p>	<p>Site is considered appropriate for business floorspace, given context of White Lion Street.</p> <p>Amendments made in response to Canal and River Trust.</p> <p>The site allocations is a 15 year plan. Identifying current status at the time of writing is not considered necessary.</p>

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AUS5: 94 White Lion Street (BSG House), N1 9PF	Statutory consultee, Business Improvement District	<p>TfL suggest the reduction in local travel from Crossrail 2 should feature in the 'allocation and justification' and transport and capacity improvement should be optimised on this site.</p> <p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>BID note that site Ownership has changed and that the current owners do not intend to develop. Planning Permission P2015/0704/FUL has expired. Site should be removed from schedule.</p>	<p>Site is considered appropriate for business floorspace, given context of White Lion Street.</p> <p>Amendments made in response to Canal and River Trust.</p> <p>Recent permission suggests there is scope for development. Existence of allocation does not force redevelopment.</p>
AUS6: Sainsbury's, 31-41 Liverpool Road, N1 0RW	Statutory consultees, Business Improvement District, Landowner, Resident.	<p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>BID note Culpepper Community Gardens SINC remains relevant and reference should be reinstated.</p> <p>Landowner comment the allocation is inconsistent with national and regional policy. There's no evidence to support significant business floor space requirement and removal of housing. Request to allocate business and residential uses.</p> <p>Resident has concerns that reducing the car park would impact on Sainsbury's viability; impact of Crossrail2 and other developments would lead to gentrification, loss of storage/delivery and create tension upon the market. Preservation of the historic character around Chapel Market should be a priority and the council should fund this.</p>	<p>Amendments made in response to Thames Water and Canal and River Trust.</p> <p>Reference to SINC will be added to development considerations.</p> <p>The council has balanced plan priorities and reflected this in relevant allocations. This location is fundamentally commercial, hence the focus on commercial development. There is no explicit priority for housing above other uses set out in national or regional policy. We note that policy at both tiers highlights the importance of business floorspace to facilitate a healthy, successful economy. The GLA response to the draft plan explicitly supports the chosen approach set out in draft Policy B2, to prioritise its delivery within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas (including Angel and Upper Street, King's Cross and Pentonville Road), and within Islington's town centres and Priority Employment Locations. The response noted that the draft plan was in general conformity as drafted.</p> <p>All development must be car free (Policy T2). Any application would on a case by case basis need to demonstrate car parking was essential for the continued operation of the use for it to be acceptable. Storage is protected on White Conduit Street. Crossrail 2 is as yet unfunded and any local benefit would only be in terms of additional transport capacity. Funding related to heritage improvements would need to come through different streams.</p>
AUS7: 1-7 Torrens Street, EC1V 1NQ	Statutory consultees, Landowners, Business Improvement District, Resident.	<p>TfL suggest that the promotion of mixed use developments in areas of high PTAL would help reduce the need for local travel. It is suggested that this is acknowledged in the 'allocation and justification' text for the allocations close to Angel Station, including AUS7 (1-7 Torrens Street). It should also be noted that Old Angel station building contains essential power and other equipment which would presumably be very difficult and expensive to relocate.</p> <p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p>	<p>Allocation encourages commercial/cultural/community uses. Reference to Old Angel station constraints will be added.</p> <p>Amendments made in response to Thames Water and Canal and River Trust.</p> <p>Given projected business space demand, residential uses are no longer appropriate. Hotels are not a priority and Crossrail 2 is unfunded and unlikely to operational until mid-2030s. Allocation does not seek to retain existing buildings. TfL's submission did not include removal of safeguarding for 3, 5 and 7 Torrens Street. The allocation does not preclude piecemeal development of the individual sites but comprehensive redevelopment would be a priority.</p>

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		<p>Landowner agree with office and retail allocation but it should also include residential and hotel uses to improve the night time economy and support Crossrail 2. Architectural quality should be significantly improved here. LBI has indicated 1, 3, 5 and 7 Torrens Street to be delivered as a single scheme but this is unlikely whilst number 1 is safeguarded for Crossrail 2. Numbers 3,5 and 7 could be comprehensively considered. Reference to Crossrail 2 safeguarding should only apply to 1 Torrens Street.</p> <p>TfL as a landowner considers residential development would be in line with draft London Plan Policy H1 and NPPF.</p> <p>Adjacent resident to the site raises concerns about building heights, amenity impacts, redevelopment works and structural integrity of their Georgian house.</p> <p>BID comment the site is unlikely to be available due to contamination and Crossrail safeguarding. Separately identify immediate improvement of the former Angel Tube Station for which there is S106 monies allocated.</p>	<p>The site is in Angel Town Centre and CAZ; thus commercial space should be a priority in line with Policy SD5 draft London Plan.</p> <p>Any proposal will be assessed through the formal planning process using the policies of the Local Plan which include protecting heritage assets, high quality design and protecting residential amenity.</p> <p>Local Plan runs for 15 years so medium/long term sites are appropriate. Site constraints have been identified. Not necessary to identify former Angel Tube Station separately.</p>
AUS8: 161-169 Essex Road, N1 2SN	Statutory consultee, Landowner, Business Improvement District	<p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Landowner note high cost of restoration of the building would necessitate combination of D1, D2, C3 uses to reflect commercial reality of restoration which will cost £15-20million. Support for recognition of development potential of the car park.</p> <p>BID request the status of extant planning applications be stated.</p>	<p>Amendment made in response to Thames Water.</p> <p>Existing use is D2 in a predominantly commercial area. Proposed Cultural Quarter in Angel will support cultural uses. Viability information not relevant for allocation purposes but could be relevant in future planning applications. Any merits of a scheme in heritage terms would be assessed and factored into the decision making balancing exercise. Allocation will be amended to say cultural and leisure uses instead of just D2 use.</p> <p>Identifying current status is unnecessary given the plan spans 15 years.</p>
AUS9: 10-14 White Lion Street, N1 9PD	Statutory consultees, Business Improvement District	<p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p> <p>BID request the status of previous planning applications be stated.</p>	<p>Amendments made in response to National Grid, Thames Water and Canal and River Trust.</p> <p>Identifying current status is unnecessary given the plan spans 15 years.</p>

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Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
AUS10: 1-9 White Lion Street, N1 9PD	Statutory consultee, Business Improvement District	<p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p> <p>BID request the status of previous planning applications be stated.</p>	<p>Amendments made in response to National Grid, Thames Water and Canal and River Trust.</p> <p>Identifying current status is unnecessary given the plan spans 15 years.</p>
AUS11: Collins Theatre, 13-17 Islington Green, N1 2XN	Statutory Consultee, Landowners, Business Improvement District	<p>Theatres Trust support the allocation.</p> <p>Berjaya UK Investment and Development Limited is seeking to deliver a theatre but the allocation should be deleted. Failing this, allocation should read 'protection of the residential on site and recognition of the cultural role of the site to provide commercial space and a theatre'. Landowner highlights some incorrect information regarding: ownership; site name; and allocation.</p> <p>BID request the status of previous planning applications be stated.</p>	<p>The theatre use has not materialised after 18 years so reasonable to allocate to provide further requirement to provide. Residential uses already constructed will be protected under policy. Commercial space may be suitable but should not detract from the theatre use. Owner name will be changed, address to change to 'proposed Collins Theatre, allocation to refer to 'bringing the permitted theatre into use.</p> <p>Identifying current status is unnecessary given the plan spans 15 years.</p>
AUS12: Public Carriage Office, 15 Penton Street, N1 9PU	Landowners	<p>Wellington Pub Company does not object to redevelopment but concerned residential use could impact on the Lexington pub's operation. Additional guidance requested to emphasise importance of surrounding businesses and reference to the Lexington's specific operations and need for retention. Locational and design criteria are proposed to prevent development interfering with the pub and the need to accord with the Agent of Change principle.</p> <p>TfL as a landowner welcome the allocation however, believe the wording should allow proposed uses to be more balanced and not preclude residential led development where this would support re-provision of business space.</p>	<p>Comment noted. It is inappropriate to use an allocation to protect a named business. Policy DH5 would offer strong protection and would cover criteria suggested by respondent. Justification for mechanical ventilation would need to balance between policies DH5 and S6.</p> <p>Site is located in Angel Town Centre and is within the CAZ, therefore commercial space should be considered a priority. Accords with draft London Plan policy SD5.</p>
AUS13: N1 Centre, Parkfield Street, N1	Statutory consultees, Business Improvement District	<p>Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p> <p>Business, Angel.London request the status of previous planning applications be stated.</p>	<p>Amendments made in response to National Grid, Thames Water and Canal and River Trust.</p> <p>Identifying current status is unnecessary given the plan spans 15 years</p>
AUS14: 46-52 Pentonville Road, N1 9HF	Business Improvement District	<p>Planning Permission P2017/3100/FUL granted September 2018. This is for change of use and internal works only. It is not clear why this is given a site allocation in preference to any other site. Remove from Schedule</p>	<p>Permitted scheme is a significant change of use. Given the priority for office floor space in the draft plan, it is considered appropriate to identify any potential additional sources of office floor space, including through revisions to extant permissions.</p>

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AUS15: 46 Essex Road, N1 8LN and 160-162 Packington Street, N1 7UG	Statutory consultee, Business Improvement District	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Angel.London request site is removed as consent has been issued.	Site will be removed.
AUS16: Angel Square, EC1V 1NY	Statutory consultee, Business Improvement District, Landowner.,	TfL note site was identified by Crossrail 2 but this is incorrect. Transport investment and capacity improvements brought by Crossrail 2 should be optimised on this site. The promotion of mixed use developments in areas of high PTAL would help reduce the need for local travel and should be acknowledged. Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel. Landowner, Derwent London note their support. BID comment reference to building façade is judgemental opinion and question how comprehensive development for three allocated sites will be achieved.	Amendments made in response to TfL and Canal and River Trust. Site is considered priority for office use rather than mixed-use. Comprehensive development is aspirational. Building façade reference refers to current inactive relationship with the street.
AUS17: Windsor Street Car Park, N1 8QF	Statutory consultee Business Improvement District	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Business, Angel.London request the status of previous planning applications be stated.	Additional text in development considerations will be added in response to Thames Water. Identifying current status is unnecessary given the plan spans 15 years.
AUS18: Royal Bank of Scotland, 42 Islington High Street, N1 8EQ	Statutory consultee, Business Improvement District	Transport investment and capacity improvements brought by Crossrail 2 should be optimised on this site. The promotion of mixed use developments in areas of high PTAL would help reduce the need for local travel and should be acknowledged. Canal and River Trust suggest amending wording of development considerations to avoid adverse impacts to the foundations on the zone of influence around Islington Tunnel. Thames Water identify no water supply capability issues. National Grid note the site is in close proximity to a high voltage underground electricity transmission cable. Site boundary has been redefined/reduced but the site area is the same. The site is unlikely to be available for development in the foreseeable future due to Crossrail works safeguarding. Crossrail 2 safeguarding should be identified.	Site is considered suitable for office intensification, given its location and current use. Wording to be amended re: Canal and River Trust response. Already referenced in allocation but wording will be amended to make need for dialogue with National Grid more explicit. The site size will be checked for accuracy. Amends re: Crossrail 2 safeguarding not necessary.
NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	Statutory consultee, Resident, Business, Local Group.	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Highbury Community Association wish to see Nag's Head retained as a retail centre and oppose buildings up to 15 storeys as being too high. A resident suggests sites NH1, NH2 and NH12 should be developed holistically and finds the tall building sites to not have considered the local context and impact upon the neighbourhood.	Additional text in development considerations will be added in response to Thames Water. Town Centres will continue to be promoted as retail centres. LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation.

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		<p>Wm Morrison Supermarkets Ltd support the retail led allocation. However, an anchor store (Morrisons) and the associated car park should be re-provided. Comment was also made about the misleading nature of the Primary Shopping Area in relation to the Holloway Road elevation. Morrisons expresses grave concern about the potential closure of the store and car park during redevelopment of site NH1, which could have severe impacts upon employment, viability, convenience and affect the wider centre. Suggest that the allocation should specify a temporary site for relocation of the supermarket and car park during construction.</p> <p>Wm Morrison Supermarkets Ltd notes any residential development on upper floors should be designed so as to not compromise Morrisons trade, deliveries or customer access. This should be added to the development considerations.</p>	<p>The Local Plan will operate a car free policy so re-provision of the car park will not be sought. Policy T3 allows for parking essential for operational purposes, where need is identified. Primary Shopping Area will be clarified as requested.</p> <p>We recognise the concerns raised but this is ultimately something that would factor into the overall decision to redevelop. It is more relevant to provisions of the lease than planning. However, we will amend the development considerations to encourage any measures to mitigate impacts on Morrisons in terms of ongoing operation, where possible. However, given the amount of land required, provision of a temporary supermarket and car park would be highly unlikely.</p> <p>Policy DH5 (agent-of-change) would offer strong protection with regard to development of residential uses on upper floors.</p>
NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	Statutory consultee, Local Group.	<p>Local group oppose a building up to 15 storeys as too high.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>A resident suggests sites NH1, NH2 and NH12 should be developed holistically and finds the tall building sites to not have considered the local context and impact upon the neighbourhood.</p>	<p>LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation.</p> <p>Additional text in development considerations will be added in response to Thames Water.</p>
NH3: 443-453 Holloway Road, N7 6LJ	Statutory consultee, Resident, Landowner	<p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Landowner support the adopted site allocation but object to the proposed site allocation and deem residential to be compatible with commercial uses as it can act as an enabling factor in development. Respondent also request the current uses in the allocation include B1a, B2, B8 uses to be consistent with pre-application advice.</p> <p>A resident queried whether the allocation means no residential development or hotels will be built on site. Development would likely impact on light that reaches the respondent's property.</p>	<p>Additional text in development considerations will be added in response to Thames Water.</p> <p>Updated evidence demonstrates a significant need for new office floor space so this is the priority on this site. Previous uses will be updated to reflect documents which supported planning application.</p> <p>Hotel not suitable on site in line with Policy R12. Residents and stakeholders would be able to comment of any planning applications. Local Plan includes policies on impact of daylight but right to light is a legal issue and not a planning issue.</p>
NH4: Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	No comments received	N/A	N/A
NH5: 392A and 394 Camden Road, N7	Statutory consultees	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p>	<p>Response is noted and additional text will be included in the development considerations.</p> <p>Already referenced in allocation but wording will be amended to make need for dialogue with National Grid more explicit.</p>
NH6: Ada Lewis House, 1 Dalmeny Avenue, N7 0LD	Statutory consultee, Resident.	<p>National Grid note the site is in close proximity to a high voltage underground electricity transmission cable.</p> <p>Resident comments some sites (including NH6) have already been started or built out so should be deleted.</p>	Site will be removed.

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NH7: Holloway Prison, Parkhurst Road, N7 0NU	Statutory consultee	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.	Response is noted and additional text will be included in the development considerations.
NH8: 457-463 Holloway Road, N7 6LJ	No comments received	N/A	N/A
NH9: Islington Arts Factory, Parkhurst Road, N7 0SF	Statutory consultee	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.	Response is noted and additional text will be included in the development considerations.
NH10: 273 Camden Road, N7 0JN	Statutory consultee, Resident	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading. Resident comments some sites (including NH6) have already been started or built out so should be deleted.	Site will be removed.
NH11: Mamma Roma, 377 Holloway Road, N7 0RN	Residents.	Five residents object to the allocation. Not enough information has been given on the allocation such as building height, pollution, noise, privacy. Concern about this project as many of the occupants were not notified. Nag's Head needs more green space and less development. Overshadowing of gardens will cause issues.	Site allocations identify potential sites and appropriate uses based on evidenced need. Residents would be able to comment on applications as they come forward. The site is not suitable for a tall building. Design including height would be assessed against relevant policies which protect character and amenity. This would include consideration of impacts on residents, any heritage assets and open space, as well as delivery and servicing.
NH12: 379-391 Camden Road and 341-345 Holloway Road	Residents and Landowners.	Five residents object to the allocation. A resident suggests sites NH1, NH2 and NH12 should be developed holistically and finds the tall building sites to not have considered the local context and impact upon the neighbourhood. A resident considers that the detail of the allocation is too vague and fails to consider circumstances of the area including cumulative impacts. Resident considers that this could to give rise to potential grounds for judicial review. Proposed building heights are not in keeping with the Hilmarton Conservation Area and would infringe on light and privacy of adjacent properties and would create a wind tunnel effect. Nag's Head is not considered appropriate for such large scale development especially given the development of Holloway Prison. Concern that development may increase crime levels. Landowners both support the allocations	LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation. Other policies would assess impacts on heritage, microclimate and other issues. Consultation was fully consistent with legislation and the council's Statement of Community Involvement. The letter sent to properties within 30 metres of the site included reference to the allocation being proposed, information on how the document could be viewed, and direct contact details for any queries. Islington have significant development needs for new housing and employment. Tall buildings, where suitable, are a part of meeting these needs. Nag's Head is a Town Centre location and is suitable for new development. The evidence base underpinning the Local Plan includes consideration of the cumulative impact of new development on infrastructure. Right to light is a legal issue and not a planning issue, however the impact on daylight and sunlight levels in terms of how it affects residential amenity would be factored in to planning assessments.
NH13: 166-220 Holloway Road, N7	Statutory consultee, Local Group, Landowner	Historic England note there has been no assessment of potential impacts upon the townscape or individual heritage assets.	LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only

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		<p>Local group oppose building of 76m high.</p> <p>London Metropolitan University object to the omission of student accommodation, which is included in the current adopted allocation. LMU support the allocation in regards to increasing the height of the LMU Tower by 20m, which they consider could support residential accommodation. An LMU master planning exercise will address public realm improvements and allow for public events in a central plaza.</p>	<p>acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation. Re: heritage assets, proposals have to satisfy Part F of Policy DH3 including conserving/enhancing heritage assets.</p> <p>The adopted allocation notes that for LMU sites (A, B and C collectively), an element of student accommodation may be included. Site C has now delivered around 900 student bedspaces, which clearly constitutes the element allowed across the A, B and C sites. The fact that NH13 and NH14 do not include an allocation for student accommodation is therefore justified. The council has retained the remaining adopted student accommodation allocation (NH15, previously site E) but we consider that further allocations would undermine the objectives of the plan. We note that the London Plan requires PBSA to secure nomination agreements with HE providers, meaning that NH15 could be utilised as provision for LMU.</p> <p>Support for height element of allocation noted, although we note in response that the allocation would not allow for residential uses.</p>
NH14: 236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD	Landowner, resident	<p>London Metropolitan University object to the omission of student accommodation, which is included in the current adopted allocation.</p> <p>It appears illogical to prohibit London Met from meeting its needs for student accommodation on its own site where surplus space exists, while permitting student accommodation on a neighbouring site. A private development on this site would not be able to offer the support and pastoral care which is critical to ensuring successful learning outcomes, quality of life and in safeguarding students' mental health. LMU note that student accommodation is an integral element to the delivery of their estates strategy and OCOC project and note masterplan work that will be prepared. The approach taken by the council is inconsistent with the London Plan policy H17. The University notes the reference in NH14 that development should provide active frontages along Holloway Road and will be expected to contribute to improving the public realm, particularly the poor physical environment along Holloway Road and Hornsey Road. The current master planning exercise will address this.</p> <p>London Metropolitan University also propose there are several other sites that would be suitable for tall buildings.</p> <p>A resident suggests the mirror clad building at the corner of Hornsey Road and Holloway Road would be more appropriate for tall building development than the Met Tower.</p>	<p>See response to NH13 re: principle of student accommodation allocation and discussion of adopted site allocation.</p> <p>Support for active frontage and public realm elements of the allocation are noted.</p> <p>LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence. Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation.</p>
NH15: 45 Hornsey Road (including land and railway arches 1-21 to rear), N7 7DD and 252 Holloway Road, N7 6NE	Statutory consultee	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.	Response is noted and additional text will be included in the development considerations.
NH16: 11-13 Benwell Road, N7 7BL	No comments received	N/A	N/A
FP1: City North Islington Trading Estate, Fonthill	Statutory consultees	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network	Response is noted and additional text will be included in the development considerations.

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Road and 8-10 Goodwin Street, N4		<p>infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>TfL note incorrect reference to Crossrail2 safeguarding area.</p>	Amend as per TfL response.
FP2: Morris Place/Wells Terrace (including Clifton House), N4 2AL	Statutory consultee, Local Group, Landowners, Business	<p>TfL highlighted the allocation incorrectly identifies the site as being close to the Crossrail2 safeguarding area.</p> <p>Local group do not accept argument for 15 storey building.</p> <p>Two landowner support the allocation.</p>	<p>Amended as requested by TfL.</p> <p>LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence.</p>
FP3: Finsbury Park Station and Island, Seven Sisters Road, N4 2DH	Statutory Consultee (TfL), Landowner (TfL), Local Group.	<p>TfL City Planning find complete redevelopment of Finsbury Park station unrealistic and text incorrectly identifies it sites within Crossrail2 safeguarding land.</p> <p>TfL Commercial Development support the allocation but see a residential led scheme as being more in line with the draft London Plan.</p> <p>Local group consider that any redevelopment should only be considered after proper consultation with the local community</p>	<p>Allocation explicitly indicates redevelopment is a long term aspiration. Crossrail 2 reference to be removed.</p> <p>The Employment Land Study highlights the need for 400,000sqm of additional B1a floor space by 2036. Core area of Finsbury Park is predominantly commercial therefore business led with an element of residential is an appropriate allocation</p> <p>Consultation with the local community and stakeholders will take place before any redevelopment takes place, as part of planning application at the very least.</p>
FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street, N4	Statutory consultee	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.	Response is noted and additional text will be included in the development considerations.
FP5: Highbury Vale Police Station, 211 Blackstock Road, N5 2LL	Statutory consultee, Local Group.	<p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Local group object to the retail use allocation in favour of a community or educational use.</p>	Site will be removed as it is nearly complete.
FP6: Cyma Service Station, 201A Seven Sisters Road, N4 3NG	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
FP7: Holloway Police Station, 284 Hornsey Road, N7 7QY	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
FP8: 113-119 Fonthill Road, N4 3HH	Statutory consultee	TfL highlighted the allocation incorrectly identifies the site as being close to the Crossrail2 safeguarding area.	Amended as requested.
FP9: 233 Seven Sisters Road, N4 2DA	Statutory consultee	TfL highlighted the allocation incorrectly identifies the site as being close to the Crossrail2 safeguarding area.	Amended as requested.
FP10: Former George Robey Public House, 240 Seven Sisters Road, N4 2HX	Statutory consultee	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>TfL note incorrect reference to Crossrail2 safeguarding area.</p>	<p>Thames Water response is noted and additional text will be included in the development considerations.</p> <p>Amend as requested by TfL.</p>

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FP11: 139-149 Fonthill Road, N4 3HF	Landowner	Polar Romax Ltd support the allocation but consider that A2, B8, D1 and D2 uses are also suitable in response to market demand for these. Note that the allocation incorrectly states application P2017/0333/FUL has expired when it was refused.	Support noted. The allocation offers flexibility for different commercial uses but retail and office are the priority in this location. Other uses may be acceptable depending on the quantum of priority uses.
FP12: 179-199 Hornsey Road, N7 9RA	No comments received	N/A	N/A
FP13: Tesco, 103-115 Stroud Green Road, N4 3PX	Residents	<p>One resident supports the allocation but requests a local business occupies the retail space and the housing be affordable.</p> <p>Seven local residents raise concerns over potential development including noise, light and privacy amenity issues; overly dense development and its impacts on the surrounding area; the need for affordable housing; building height and the design in relation to the areas Victorian character and adjacent Conservation Area; security and access.</p>	<p>Support noted. Planning policy cannot give local businesses priority. Policy H3 requires genuinely affordable housing.</p> <p>Site Allocations identify potential sites for development and assign appropriate uses for that site based on evidenced need. Proposals which do come forward would need to be consistent with an allocation and various policies in the Local Plan. Residents and stakeholders will be able to comment on planning applications as they come forward for each site. The housing need in Islington is acute and therefore all suitable opportunities for new housing should be prioritised. In line with Local Plan policies, planning applications will assess the impacts of a proposal on local amenity, including consideration of noise, security, overlooking and privacy. Impact on existing infrastructure would also be considered, as would impact on heritage assets, levels of daylight and sunlight and any other relevant consideration. Proposals will need to be of a high quality in line with specific design criteria and standards</p>
FP14: Andover Estate bounded by Durham Road, Moray Road, Andover Road, Hornsey Road, Newington Barrow Way and Seven Sisters Road, London N7	Statutory consultee, Residents.	<p>Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading.</p> <p>Several residents of the Andover Estate commented with similar concerns. There was a general misunderstanding of the site allocations purpose and the engagement processes that have taken place. Concerns with the allocation included: a reduction in public and green space; impacts on daylight; accessibility; over density; and building heights.</p>	<p>Response is noted and additional text will be included in the development considerations.</p> <p>The Local Plan has policies to protect and promote open space, and protect residential amenity. The allocation is based on the uses permitted by the application and while it references the permission, it is not prescriptive in itself regarding the form of future proposals; therefore, it is not considered necessary to refer to future phasing in the allocation. The proposal has outline permission which is referenced in the allocation, and will require further reserved matters permission for future phase(s); this will involve further consultation with residents. The process is being managed by the council's housing department. The council has considered all responses to previous rounds of consultation but these did not raise any issues relating to the principle of the allocation or the uses proposed. The majority of responses received related to the specific detail of the already permitted scheme,</p>
FP15: 216-220 Seven Sisters Road, N4 3NX	No comments received	N/A	N/A
FP16: Conservative Club, 1 Prah Road, N4 2RA	Local Group, Landowner	<p>Local group stress development must protect the local community's interests.</p> <p>The landowner London Centric Ltd object to the allocation raising a number of points. They consider a purely residential allocation is most appropriate and viable. The site does not sit within a typical Town Centre environment; rather, it is predominantly residential in character, perhaps better understood in the context of an "area of transition". Pre-application discussions were held discussing range of options.</p> <p>Identification of the site by a Town Centre Manager is not appropriate.</p>	<p>The council disagree that this site sits within an area of transition or area with residential character; it is clearly a town centre location given the mix of town centre uses evident in the immediate vicinity, it's location on a well-used pedestrian route and the proximity to Finsbury Park station. It is a location perfectly suited for commercial development. The council do consider a change to the allocation is necessary to reflect that a mix of uses is unlikely, hence the allocation will be for business floorspace, particularly SME space.</p> <p>Pre-app advice has no statutory weight and is not binding on plan preparation.</p>

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		<p>Building height allowed should be higher.</p> <p>Provide an “analysis” in Appendix C which concludes that it is only larger sites in excess of 601sqm that have the capability to deliver a broad mix of town centre uses.</p> <p>Large HMOs and PRS are supported by the draft London Plan and meet housing need, so should be allowed on the site.</p> <p>Respondent notes a number of perceived inconsistencies with NPPF and PPG, and with London Plan. They also reference the Housing White Paper.</p> <p>London Centric note there are some factual inaccuracies on the form. Address: This should state “Former” Conservative Club or just, 1 Prah Road. Current/previous use: “Private” Social Club. Site Designations and Constraints: Site is in close proximity to City and Islington College building 3 Prah Road, however, please correct so as to state that “access to the College is achieved via Blackstock Road.” Estimated Timescale: This should read as “unknown”, as if the current land use allocation is to remain this would halt the prospect of the Site coming forward, therefore, the desired or listed 2020/21-2024/25 would not be feasible.</p>	<p>The fact that the site was put forward by the town centre manager is completely irrelevant; this was the original source of the site but policy officers have then applied their own judgement following identification and in our opinion the allocation, in particular the uses proposed, are suitable given the location. This is consistent with the NPPF, which we note does not have any hard and fast requirements about how sites come forward.</p> <p>LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence</p> <p>There is no evident coherent methodology associated with the information in Appendix C. Of particular note is the seemingly arbitrary use of 601sqm as a threshold for larger footprint sites, which by coincidence seems to enable conclusions that reinforce the respondent’s views. There are several proxy definitions for small/large sites that would have more rigour. The principle of allocating smaller sites is supported by national and regional policy. Leaving aside the fairly poor standard of analysis and considering the conclusions (a and b) deduced by the respondent, these are pure speculation, e.g. the assumption that uses on allocations that have not yet come forward must be undeliverable, otherwise the allocations would have come forward by now; there is no evidence to support this. It certainly does not apply as a general and no site specific reasons have been put forward either; there are a number of reasons why a site may not have come forward.</p> <p>It is noted that the respondent has cited an old draft of policy H18 of the London Plan; the latest draft removes reference to large-scale HMOs meeting identified need and clarifies that they are a limited product suitable for single person households. This reinforces the councils approach to restricting this type of housing as it does not meet identified housing needs across a range of groups, particularly families. As above, we note that the mayor found the draft plan to be in general conformity with the draft London Plan.</p> <p>The White Paper is not of relevance given the revised versions of the NPPF which incorporate elements of the White Paper. Draft Local Plan is consistent with national policy and draft London Plan.</p> <p>Address and site name will be changed to 1 Prah Road. Current use will be changed to reflect fact that it is a SG main TC use rather than SI. Amendment re: access to Candl not considered necessary - will amend wording and seek permeability and connectivity through development considerations. Timescale will not be amended, as proposed timescale is considered appropriate.</p>
ARCH1: Vorley Road/Archway Bus Station, N19	Local Group, residents.	<p>Local group welcome the protection on Archway Community Care Centre but suggest private and social/affordable housing on site would likely be divided, emphasising social division.</p> <p>Local group and a resident comment that there do not seem to be measures to protect the mature trees on Vorley Road.</p>	<p>Any loss of the community centre must be justified in line with policy SC1. There is no evidence to suggest the dwellings would be split as per the speculative suggestion and proposals must adhere to policy H4. Policies in chapter 5 would give strong protection to trees.</p>

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		A resident expresses concern about the tall building allocation of up to 15 storeys. Considers there might be negative impacts on nearby properties.	Tall building locations are only acceptable in principle. Any proposal would need to address Policy DH3 criteria as well as other policies and be subject to statutory consultation.
ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ	Local Group, Resident, Landowner.	<p>Local group and a resident comment there is no mention of seeking retail continuity along Junction Road. Highgate Hill station entrance should include increased accessibility and increased opportunities for natural light. Rooftop should have roof top planting.</p> <p>TfL as a landowner welcome the allocation. However, residential use should also be included in the allocation. Location adjacent to Archway Underground Station presents a prime opportunity for residential development and features as part of Policy CS1 of the Core Strategy.</p>	<p>Development considerations specifically mention active frontages. LBI will work with TfL to identify station improvements. Policy SP7 Part G supports these improvements. The council has policies to support urban greening including green roofs.</p> <p>LBI evidence shows a need for 400,000sqm of additional B1a floorspace by 2036, and much of Archway's business floor space has been lost under PD rights. Town centre is predominantly commercial hence business use being a priority here. There have been significant changes since the Core Strategy was adopted.</p>
ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD	Local Group, Resident, Landowner	<p>Local group and a resident welcome the allocation but frontages on St John's Way should be for a cultural hub and not interrupted by retail frontages.</p> <p>The landowner, Flowervale Properties Ltd note ownership inaccuracies of part of the site and inaccuracies related to access to the Main Hall. The allocation does not elaborate on what cultural use the main hall would comprise of.</p> <p>Flowervale Properties Ltd strongly object to the Main Hall being allocated for redevelopment into a cultural hub and request it be for B1a use or other town centre uses. Respondent cites lack of evidence to support cultural use allocation; un-deliverability due to English Heritage and GSE identifying refurbishment to be unviable for a community/cultural use; restrictive covenants held by Methodist Church which restrict leisure and religious uses.</p> <p>Employment Land Study identifies loss of office outside the CAZ as a threat. 2013 Site Allocations DPD accepted office and residential in principle, and the location is prime to maximise high grade office space or other town centre uses in a sustainable location.</p>	<p>The wording would allow for either eventuality.</p> <p>Boundary will be amended. Cultural uses are broad, and Policy R10 and SP7 provide further information on this.</p> <p>Archway's burgeoning cultural role is detailed in Policies R10 and SP7. Evidence from English Heritage and marketing information do not affect the principle of the allocation for a cultural hub and will be considered at planning application stage. The restrictive covenant only precludes alcohol sale, gambling and dancing but there are many other suitable cultural uses. The allocation reflects the council's preferred use given the location, the emerging Archway cultural context and the lawful use.</p>
ARCH4: Whittington Hospital Ancillary Buildings, N19	No comments received	N/A	N/A
ARCH5: Archway Campus, Highgate Hill, N19	Statutory Consultee, Local Group, Resident, Landowner.	<p>Historic England note existing buildings make a positive contribution to the streetscape, thus should be retained.</p> <p>Local group comment existing building heights should be specified to protect the Conservation Area.</p> <p>Landowner, Peabody support the allocation.</p> <p>Resident claims existing building heights identified in the Tall buildings study are incorrect.</p>	<p>The allocation references conservation area and locally listed building; positive contribution and onus on retention will be assessed as part of planning application</p> <p>Not necessary to stipulate building heights in allocation where TB is not suitable. Site constraints are clearly identified. Any taller building will be assessed on a case by case basis in line with DH3.</p> <p>Support noted. Linked to Peabody comment on policy SC1, the council will amend allocation to reflect need for justifying loss of SI, which is consistent with drafting of other allocations with existing SI.</p>

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			Building heights map in TB study is indicative and has not directly informed the TB study conclusions, nor could it be used in the assessment of future applications.
ARCH6: Job Centre, 1 Elthorne Road, N19 4AL	Local Group, Residents, Landowner	<p>Local group and a resident request reference to the open space at rear of the site and trees are protected.</p> <p>Landowner, Gladquote Ltd supports allocation but considers site suitable for residential instead. Indicative capacity figures should be provided and the site should support a tall building.</p> <p>A resident expresses support but finds a tall building at ARCH6 would block out light.</p>	<p>Trees and private open space are protected by Local Plan GI policies. Tree Preservation Orders can be put forward anytime.</p> <p>Site is existing employment use in a commercial area and given the demand for business floor space, the allocation is appropriate. Indicative capacity figures will be specified in next plan iteration. Tall building sites have been informed through a detailed study.</p> <p>ARCH6 has not been identified for a tall building over 30m. Any taller building less than 30m will be subject to policy DH3. Impact on adjacent properties will be considered.</p>
ARCH7: 207A Junction Road, N19 5QA	Local Group, Resident, Landowner	<p>Local group note the site name is incorrect.</p> <p>Local group and resident also suggests potential to re-open station of Station Road to improve connectivity and this possibility should be safeguarded.</p> <p>TfL as a landowner support the allocation</p>	Name will be amended. LBI not aware of TfL priority for such scheme, thus is not appropriate to safeguard for an aspiration.
ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ	Landowner	Dorrington Plc deem the requirement to provide co-working space is unreasonable and unjustified. It would effectively deter any future aspiration to both reconfigure the existing buildings and develop additional space to make the most of this existing employment site, as the provision of such space would not align with the requirements of its existing or likely future business/office tenants.	Policy amended to refer to office.
ARCH9: 724 Holloway Road, N19 3JD	Statutory consultees	<p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Historic England note existing buildings make a positive contribution to the streetscape, thus should be retained.</p>	<p>Response is noted and additional text will be included in the development considerations.</p> <p>The allocation references nearby conservation area and listed building; positive contribution and onus on retention will be assessed as part of planning application</p>
ARCH10: Elthorne Estate, Archway, N19 4AG	Statutory consultee, Local Group, Resident.	<p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Local group and resident requested public realm improvements based around connectivity.</p> <p>GLA noted that a good supply of sports and recreation facilities should be maintained and that their loss should be supported by evidence. Refer to policies S5, G1 and G4 of the draft London Plan.</p>	<p>Response is noted and additional text will be included in the development considerations.</p> <p>Policy SP7 promotes good connectivity and permeability for pedestrians and cyclists. Schemes suggested would likely come forward through CIL funding.</p> <p>The draft Local Plan has strong protection for sports and recreation facilities. The council has undertaken a sports facilities study to inform the draft Local Plan.</p>
ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS	No comments received	N/A	N/A
ARCH12: 798-804 Holloway Road, N19 3JH	Local group, resident	Local group and a resident comment that, if LB Islington does wish to reduce the borough's carbon footprint it can support this by including policy seeking refurbishment of existing buildings as the default option.	This site has already been granted permission P2017/4826/S73 for the demolition of the existing building and erection of a part two, part four part five storey building. Policy S1 does refer to circular economy for future schemes.

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HC1: 12, 16-18 and 24 Highbury Corner, N5 1RA	Statutory consultee, Local Group, Landowner, Resident.	<p>TfL think the timescales are too optimistic and red line boundary should encompass the old station.</p> <p>Local group support allocation for HC1 and HC3 but request these be considered holistically. Comments made in objection to how the gyratory has been developed.</p> <p>Highbury Community Association support allocation but request residents are properly consulted.</p> <p>Landowner, Folgate Estates support allocations and the mix of uses allocated. Suggest further properties in Appendix 1 which should be included to allow for comprehensive redevelopment. HC1 and HC5 should be acceptable to host tall buildings taking advantage of their close proximity to Highbury and Islington station.</p> <p>A resident requests development to be restricted to existing building heights as to avoid noise, air pollution and increased wind. Also notes that it will decrease value of property.</p>	<p>Timescales are considered acceptable and the boundary will be amended.</p> <p>Support noted. HC1 and HC3 will come forward in the medium/long term however consideration of cumulative impacts has been had. Transport changes taking place are controlled by TfL so not influenced by these site allocations.</p> <p>Consultation with local community will take place before development starts.</p> <p>Council do not consider that it is necessary to include several individual sites in one boundary to incentivise comprehensive redevelopment. HC1 and HC5 both have reference to potential for comprehensive development in the 'Development Considerations'. LBI approach to tall buildings is in line with the draft London Plan. Approach is underpinned by comprehensive evidence.</p> <p>The Local Plan has a number of policies to ensure protection of residential amenity. Suitable height will be assessed in line with policy DH3. Impact on property value is not a relevant planning consideration.</p>
HC2: Spring House, 6-38 Holloway Road, N7 8JL	No comments received	N/A	N/A
HC3: Highbury and Islington Station, Holloway Road, N5 1RA	Statutory consultees, Landowners, Resident, Local Groups.	<p>Historic England recommend nearby designations are referenced in allocation HC3 to ensure consideration of heritage issues.</p> <p>TfL comment over station development at Highbury and Islington could be considered in the long term provided there is no impact on the aesthetic of the station. Previous exploration of options however dismissed as unviable.</p> <p>Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.</p> <p>Local group support allocation for HC1 and HC3 but request these be considered holistically. Comments made in objection to how the gyratory has been developed.</p> <p>Another local group support allocation but request residents are properly consulted.</p> <p>Landowner requests A4 use is included in current use description. Additionally, there is no reference to A3 use being retained which affects the landowner's confidence in future investment.</p> <p>Residents raise concerns about plans to build over the railway tracks due to: noise; blocking of light; destruction of flora and fauna.</p> <p>TfL commercial development support the allocation, however given the sites high PTAL rating the development should be residential led in line with Policy H1 of the draft London Plan.</p>	<p>The council will reference heritage assets where relevant.</p> <p>Timescale indicates long term aspiration.</p> <p>Thames Water response is noted and additional text will be included in the development considerations.</p> <p>HC1 and HC3 will come forward in the medium/long term however consideration of cumulative impacts has been had. Transport changes taking place are controlled by TfL so not influenced by these site allocations.</p> <p>Consultation with local community will take place before development starts.</p> <p>Amend current use as requested, and include reference to retail, leisure and cultural uses which would include A4.</p> <p>Allocation is suitable in principle. Local Plan contains policies that ensure protection of residential amenity and green infrastructure.</p> <p>Support noted. The Employment Land Study 2016 highlights the significant need for business floor space which is a key priority for this site. The commercial nature of the area further justifies this.</p>

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HC4: Dixon Clark Court, Canonbury Road, N1 2UR	Statutory consultee, Local Group	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Local group support application.	Response is noted and additional text will be included in the development considerations.
HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London, N5 1RN	Local Group	Local group request there be no detrimental effect to Highbury Fields during and after development.	Any subsequent planning application for the redevelopment of the site will be assessed in relation to the potential impacts on Highbury Fields open space.
HC6: Land adjacent to 40-44 Holloway Road, N7 8JL	Statutory consultee	Nearby designations should be referenced for full heritage considerations.	Council will reference adjacent heritage assets.
OIS1: Leroy House, 436 Essex Road, N1 3QP	Statutory consultee, Resident	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Resident requests post war building features should be retained and adjacent buildings improved to complement each other.	Response is noted and additional text will be included in the development considerations. Concerns raised are detailed considerations for a planning application, not an allocation.
OIS2: The Ivories, 6-8 Northampton Street, N1 2HY	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS3: Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS4: 1 Kingsland Passage and BT Telephone Exchange, Kingsland Green	Statutory consultee Landowner	Thames Water advise the water network capacity may not be able to support demand so local upgrades to the existing water network infrastructure may be required; and wastewater treatment may need upgrading. Landowner have no intention for comprehensive redevelopment and circumstances have changed with the site now in the Crossrail 2 safeguarding area. NPPF para 120 referenced regarding un-deliverability of site allocations. 1 Kingsland Passage site should be removed or this site should not compromise delivery of redevelopment of the BT Exchange site.	Response is noted and additional text will be included in the development considerations. Removal of site based on Crossrail 2 safeguarding land not justifiable and will just be a development consideration. NPPF para 120 is only applicable when there is no reasonable prospect of an application coming forward. Delivery timescale will be amended. Issues raised do not affect comprehensive development and piecemeal development is not prohibited.
OIS5: Bush Industrial Estate, Station Road, N19 5UN	Landowner	LaSalle Investment Management suggests reference in OIS5 to allow co-location of non-industrial uses as part of a comprehensive development to secure the intensification of industrial floor space.	Co-location with non-industrial uses is not considered acceptable as it could compromise the economic function and future economic growth of the LSIS. GLA note approach conforms with the draft London Plan.
OIS6: 100 Hornsey Road, N7 7NG	Statutory consultee, Local Group	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Highbury Community Association state open space is crucial to the site.	Response is noted and additional text will be included in the development considerations.
OIS7: Highbury Delivery Office, 2 Hamilton Lane, N5 1SW	Local Group	Highbury Community Association have no objections to residential development and business use would need to respect residential character.	Comment noted.
OIS8: Legard Works, 17a Legard Road, N5 1DE	Local Group	LQRA Committee support the allocation.	Support noted.
OIS9: Ladbroke House, 62-66 Highbury Grove, N5 2AD	No comments received	N/A	N/A
OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road, N19 4EH	Statutory consultee (Thames Water), Landowner.	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.

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		Landowner suggests residential use should be allowed as part of a mixed use scheme. Previous applications sought to include a residential element.	Previous unsuccessful permissions are not a valid reason to preclude inclusion within an employment designation. The Employment Land Study has identified a need for 400,00sqm of additional business floor space by 2036 and Islington has a strong track record of delivering its housing target. Therefore, the suggestion is not appropriate.
OIS11: Parkview Estate, Collins Road, N5	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS12: 202-210 Fairbridge Road, N19 3HT	Statutory consultee, Landowner	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key. Landowner question the need for the allocation because construction is about to commence. If allocation is retained, request for maximum flexibility of floor space to avoid vacancy. Additionally, the prescribed no net loss of business floor space is not consistent with policy. 'Development considerations' are unnecessary as planning permission P2017/2754/FUL is being implemented and timeframes of delivery should be updated to 2020. Respondent highlights ownership details are incorrect.	Response is noted and additional text will be included in the development considerations. It is possible that even with planning permission that construction may be delayed and subject to subsequent planning permissions in the future, thus the allocation will be retained. The site is in a Priority Employment Location so intensification of business use is appropriate. The allocation will be amended to refer to prioritisation of business floorspace only; B3 would apply with regard to any further losses proposed, requiring, inter alia, robust marketing and vacancy information in line with detailed criteria. Development considerations would apply to a new/amended scheme and current timeframes are appropriate. Ownership details have been updated.
OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road, N5 1XB	Local Group	Local group comment the community centre is nearly complete and there would be no objection to some residential infill to the Ronalds Road frontage.	Comment noted.
OIS14: 17-23 Beaumont Rise, N19 3AA	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS15: Athenaeum Court, 94 Highbury New Park, N5 2DN	Local Group	Highbury Community Association has no objection to a well-designed infill development.	Comment noted.
OIS16: Harvist Estate Car Park, N7 7NJ	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS17: Hathersage and Besant Courts, Newington Green, N1 4RF	No comments received	N/A	N/A
OIS18: Wedmore Estate Car Park, N19 4NU	Statutory consultee	Thames Water identify no water supply capability issues although wastewater treatment will need upgrading and early liaison is key.	Response is noted and additional text will be included in the development considerations.
OIS19: 25-27 Horsell Road, N5 1XL	Local Group, Landowners, Residents group.	Local group request the site should be retained in business use and not converted to residential. Landowner support the allocation but the allocation should be expanded to include residential use which would be consistent with approved application P2015/1655/FUL. Rear extensions are established in the extant permission and should be added to the allocation.	The allocation seeks to retain business floor space with potential for limited intensification of business use. Support noted. Updated evidence demonstrates a significant need for new B1a floor space and thus is a priority on the site. Planning permission will be reflected. Allocation refers to limited intensification where new/amended scheme comes forward, which includes extensions.

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		A residents group requests reference to 'limited intensification of business use' is removed because this may be used to justify the expansion of an already problematic operation.	Planning permission has already been granted. Updated evidence demonstrates business floor space should be the priority if an amended scheme comes forward. Any intensification will be limited and policies relating to amenity will apply.
OIS20: Vernon Square, Penton Rise, WC1X 9EW	Local organisation, Residents.	<p>Local organisation find a change of use from educational facility to business led development needs justification on the impact to social infrastructure. Request information on what type of business is being considered. Improvements to the square should be sought as well as impacts on traffic, local small businesses, shops and residents should be considered.</p> <p>Five local residents commented on the allocation and all object primarily to the impacts of noise from the proposed business/commercial use and construction:</p> <p>Considered that residential use would be more appropriate as noise impacts on Percy Circus would be detrimental to existing residents as well as noise from construction.</p>	<p>Loss of an educational facility would be subject to Policy SC1. Site Allocations identify potential uses that may be appropriate but it would be inappropriate and premature to specify the type of business. An office use would be appropriate and meets identified demand in an appropriate location. Impacts on the square and surrounding amenity would be assessed through the planning process. Stakeholders would be able to respond to consultation on any proposed planning application.</p> <p>Any noise impacts would be assessed through the planning application process, including assessment against DH5. The existing commercial use and designation within a Priority Employment Location and the CAZ means the principle of residential would not be supported.</p>
OIS21: Former railway sidings adjacent to and potentially including Caledonian Road Station	Statutory Consultee, landowner	<p>Historic England raise several concerns, including: the impact of over station development on the Grade II listed Caledonian Road station; high density can be achieved without tall buildings; although the Tall Building Study is comprehensive it does not seem to include assessment of impacts of a 12 storey building that would effectively be on top of a heritage asset.</p> <p>TfL comment that due to Caledonian Road station being Grade II listed it is unlikely it could support large scale development without demolition.</p> <p>TfL as a landowner support the allocation. TfL will seek a residential led mixed use scheme with retail at ground floor.</p>	Location is considered suitable for a tall building in principle, in line with evidence base. Any proposal would have to satisfy clause F of Policy DH3, including conserving and enhancing heritage assets. Listing does not preclude allocation in principle.
OIS22: 114 Balls Pond Road and 1 King Henry's Walk, N1 4NL	Two residents.	<p>A resident queries why the site is no longer protected for business use when Policy B3 seeks no net loss of business floor space. Concerns raised regarding: pedestrian safety, height, design, layout, access, green space. Retention of the mid-century skyline would be desirable.</p> <p>Another resident supports the allocation as an opportunity to improve the surrounding public realm.</p>	The review of existing areas informed by the Employment Land Study found no current employment uses, as the substation is a sui generis use and did not form an employment cluster. Residential use is therefore appropriate. Amendment will be made to correct identification that site is not within a Priority Employment Location. Design, layout, amenity will all be assessed against relevant policies.
OIS23: 1 Lowther Road, N7 8US	No comments received	N/A	N/A
OIS24: Pentonville Prison, Caledonian Road, N7 8TT	Landowner	<p>The Ministry of Justice note the loss of Pentonville Prison is currently an exploratory option and any loss should not be viewed as a loss of local social infrastructure. 'Loss of social infrastructure' should be removed. Some community uses on site would be appropriate given the large quantum of residential uses.</p> <p>Agree site should be predominantly residential but consideration of heritage aspects should be had, and this may affect viability of a proposed scheme so should be highlighted in the development considerations. Some business use on site would also be appropriate.</p>	<p>Policy SC1 would apply as a prison constitutes social infrastructure. However, a loss could be justified through evidence of a rationalisation programme.</p> <p>Heritage assets on site would necessitate a balance between maximising housing and protecting heritage, hence the heritage led approach.</p> <p>Reference to viability is not appropriate in the allocation, and would be justified on a case-by-case basis.</p>

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		The MoJ consider this site to an exceptional case and thus viability assessment should be accepted by the council re: policy H3.	
OIS25: Charles Simmons House, 3 Margery Street, WC1X 0HP	No comments received	N/A	N/A
OIS26: Amwell Street Water Pumping Station, Clerkenwell, EC1R	No comments received	N/A	N/A
General comments	Statutory consultees, Local groups, Residents, Business Improvement District	<p>Sport England object to any loss of any D2 uses unless these are replaced. A Built Sports Facility Strategy is needed to robustly identify a surplus of facilities.</p> <p>Historic England suggest a reference to the conservation areas and locally listed heritage assets at the start of the document.</p> <p>Highways England comment that the transport evidence base should provide indication as to the residual impact on the Strategic Road Network and this should be published prior to submission of the plan.</p> <p>Thames Water request engagement on capacity figures so cumulative impact on water and waste water can be determined.</p> <p>GLA made several comments relating to the principle of no net loss of industrial floor space should be followed.</p> <p>GLA request some more contextual maps showing designations and boundaries are added to the AAP and information of adjacent prevailing heights be provided. Urban greening factors should be included in each site.</p> <p>GLA support the document but comment more information could be provided in site allocations (indicative dwelling numbers, business floor space etc.). A good supply of sports and rec facilities should be maintained and their loss supported by evidence.</p> <p>Local organisation support the site allocations document but suggest the inclusion of the Sotheby Mews site and wonder if plans are being prepared for its redevelopment.</p> <p>A respondent suggests allocating the Former All Saints Church, Carnegie St, London N1 9QW, with potential for a 5/6 storey residential development with community/retail uses at ground floor. Respondent also suggests allocating 143 Caledonian Road for residential use with ground floor retail.</p> <p>A respondent suggests allocating contiguous Orkney House, Petrol Station, and Cally Pool.</p> <p>Landowner suggest allocating Edward Rudolf House, 69-85 Margery Street, London, WC1X 0JL for increased office space.</p>	<p>LBI has undertaken Sports Facilities evidence base update, which will be published alongside the Regulation 19 Local Plan. Snooker and yoga facilities have not been specifically addressed in the evidence but the Local Plan has strong policies protecting all sports facilities.</p> <p>Reference to CAs and other heritage not necessary.</p> <p>The scale of development sites is not considered to have an impact on the M1. Regulation 19 iteration will include indicative capacity figures which will inform transport impacts. LBIs car free policy serves to reduce the number of cars from new developments. Information for relevant site allocations will be added.</p> <p>Policy B3 amended to reference no net loss of industrial floor space so repetition in site allocations is not necessary.</p> <p>More contextual maps will be provided although the policies map will show all relevant designations. Prevailing heights will not be mapped as this could change over the plan period. UGF targets for each site are unnecessary as the plan has robust policies promoting green infrastructure.</p> <p>Indicative capacity figures will be provided in the next iteration. The draft Local Plan has strong protection for sports and recreation facilities and a study has informed the draft Local Plan.</p> <p>LBI Planning Policy Team were not aware of imminent plans at the time of writing. General policies will ensure that any proposals that affect current use will be fully assessed.</p> <p>All Saints Church and 143 Caledonian Road sites not considered to warrant allocation.</p> <p>Cally Pool and adjacent sites are covered by Part E of the Spatial Strategy - "repair, improve, unify street frontage". Main site - Cally Pool - considered unlikely to come forward for redevelopment.</p> <p>Re: Edward Rudolf House, site restrictions offer limited scope for intensification so allocation not considered justified, but development would be supported where heritage policies are met.</p> <p>Re: 87 Sunnyside Road, the proposed site is not considered to warrant an allocation. The priority for the site would be retention and intensification of business uses in line with policies B2 and B3 (and the draft London Plan).</p>

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Policy/allocation/section	Respondents	Summary of Responses	Response in Reg 19 Local Plan
		<p>Landowner suggest allocating 87 Sunnyside Road, London, N19 3SL for residential led development.</p> <p>BID comment that Crossrail 2 Safeguarding and the principal Crossrail 2 worksite constraints should be highlighted. BID also recommend adding introductory paragraph 4.3 of the SPD (in Angel sites chapter), emphasising intensification of business use and active ground floor frontages to be maintained and encouraged in relation particularly to White Lion Street sites. Similarly, it is suggested adding a paragraph emphasising the need for high design quality which adds to the attractiveness of the town centre at paragraph 4.4 of the SPD (sic).</p> <p>A resident suggests smaller sites on estates currently underdeveloped or single story should be allocated, not just central locations like at Finsbury Park which bear more challenges.</p> <p>The Environment Agency request the Thames River Basin Management Plan (TRBMP) and its recommendations should be listed as development considerations. Good ecological status will be harder to maintain without policies to facilitate this in the Local Plan or AAP. There is no evidence of a sequential test being carried out for the location of the proposed site allocations in line with the NPPF.</p> <p>Local group recommend a working version of the Site Allocations Development Plan be continually maintained as a developing document after adoption.</p>	<p>Due to the conservation area, it is unlikely that the scale of development could be increased in any significant way. The location is also about as inaccessible as you can get in Islington.</p> <p>TfL City Planning have provided further comments on Crossrail 2 which will be reflected in relevant site allocations.</p> <p>The issues suggested for inclusion at the start of chapter 4 are not common to all allocations so is not appropriate in the introduction. A range of design policies are already in the SDM document and will suffice.</p> <p>Two 'Call for Sites' have been undertaken plus inviting new sites as part of the Regulation 18 consultation, making site identification comprehensive. All new development must adhere to policies around residential amenity, sustainability and design.</p> <p>TRBMP reference will be added to relevant sites. The sequential test in relation to flood risk has been carried out in line with the NPPF. Following dialogue with the Environment Agency, the sequential test has applied to each site as part of Reg 19 IIA based on surface water rather than fluvial flood risk due to the whole borough being Flood Zone 1. Some sites coincide with areas of high flood risk identified by the Environment Agency but constrained nature and high development pressure in the borough mean there are no alternative locations. Sites in medium/high flood risk areas are required to incorporate sufficient flood resilient measures.</p> <p>Site Allocations is a Development Plan Document (DPD) and not a Supplementary Planning Document (SPD). Site allocations can only be identified in a DPD and carries more weight than a SPD. It is not legally possible to have a working version of an allocation document as it needs to be subject to statutory processes and examination. Local Plans must be updated every five years and if any significant changes were to happen before then LBI may consider reviewing the site allocations document.</p>
Bunhill and Clerkenwell Area Action Plan			
Introduction	GLA, TfL	<p>GLA note that the map image setting out the boundary or the area action plan is welcome. However, Islington should include images which illustrate the areas relationship with the CAZ and the City Fringe Opportunity Area, where it lies within the borough and the wider context of London; and should define the detailed boundary of the CAZ that falls within the AAP.</p> <p>TfL suggests amending objectives to refer to active and sustainable travel into objectives; and transport and connectivity.</p>	<p>The council will provide a more detailed context map for the AAP in the next iteration.</p> <p>The objectives are the strategic Local Plan headline objectives and are repeated from the draft SDM DPD. The Council will consider whether wording in line with that suggested should be embedded within the main objectives, but note that active travel is a way to achieve health, independence, and improve places but is not an objective in itself.</p>

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Area profile	Statutory Consultees	<p>Historic England request the newly redefined Archaeological Priority Areas should be uses.</p> <p>Corporation of London suggest it would be useful to add wording which recognises the significant change that will occur, due to Crossrail, the Culture Mile, and proposed relocation of Museum of London to Smithfield. This will cause increases in pedestrian movements are visitor activity.</p>	<p>New APAs will be referenced.</p> <p>Amendments have been made to BC2 supporting text to reflect comments.</p>
Demographics	No comments received	N/A	N/A
Planning context	Statutory Consultee, Landowners	<p>TfL note that London Underground capacity is limited and further assessment is needed before significant development capacity is increased in the City Fringe Opportunity Area.</p> <p>Several landowners support the approach to increasing office floor space to balance out supply and demand but note the challenges Islington face.</p>	In accordance with the London Plan the CAZ is suitable for growth, particularly employment uses. Development growth may catalyse investment in transport infrastructure and the Local Plan encourages walking and cycling. Buses and the Elizabeth line will also increase capacity.
Challenges	Statutory consultee	TfL caution the general statement on congestion during peak times.	In accordance with the London Plan the CAZ is suitable for growth, particularly employment uses. Development growth may catalyse investment in transport infrastructure and the Local Plan encourages walking and cycling. Buses and the Elizabeth line will also increase capacity.
Policy BC1: Prioritising office use	Landowners, Statutory consultee, Business Improvement District	<p>GLA support the approach proposed in BC1. BID express strong support for the policy, especially in protecting Clerkenwell's design status.</p> <p>A range of landowners and developers express support for the vision and objectives of this policy.</p> <p>Landowner, Picton Property Income Ltd requests that Part A should allow residential and other uses as well as offices to provide flexibility and provide development in less core commercial areas. They also request clarity on whether the 500sqm trigger applies to all development or just office; and that Part C is amended to prioritise non-residential within office schemes but allow flexibility on non-office schemes. Landowner also considers that Part D(iv) should be amended so exceptions cover predominantly/semi residential areas.</p> <p>Several landowners question the 90%/80% requirement and consider that it is too high and inflexible, fails to account for site constraints and will lead to sterile environments. One landowner requests amendment to allow alternative uses where they would provide greater social and economic benefits, while another considers there should be more flexibility in this policy for every proposal to be considered on their own merits.</p> <p>Landowner requests retail, food and drink, restaurants gym and leisure uses should be allowed to complement the business function. These uses should also not be restricted to ground floor levels.</p> <p>Landowner/education provider support Part B and C of the policy. Request amendment to Part D(ii) to include B1b uses in the policy to allow for medical and research facilities to be an acceptable use.</p>	<p>Support is noted.</p> <p>The Council's Employment Land Study (2016) highlights significant demand for business floorspace, particularly office floorspace, where there is a need to provide 400,000sqm of additional office floorspace up to the year 2036. The development of business floorspace is therefore a key priority. The proposed amendments would not be conducive to maximising new business floorspace.</p> <p>The trigger for BC1 is any development of 500sqm gross floorspace or more (not just development office floorspace). This reflects the clear priority for office use in the area. The wording of the policy and/or supporting text will be amended to clarify this beyond doubt.</p> <p>BC1 strongly and clearly prioritises office floorspace in the OA; however, it would allow the development of a mix of uses as part of the 10%/20% non-office floorspace. However, the policy will be amended so that it applies to any uplift of any scheme which meets trigger.</p> <p>BC1 allows flexibility for retail and leisure either as part of the 10/20% permissible for non-office uses, or where it meets relevant exceptions in Part D.</p> <p>Proposed amendment not required as B1b use would be considered a suitable use for QMUL site in line with allocation, therefore Part D(ii) exception would likely apply.</p>

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Policy BC2: Culture, retail and leisure uses	GLA, landowner, Business Improvement District	<p>General support for policy.</p> <p>The Farringdon and Clerkenwell BID suggest that the council should maintain a more flexible approach on the Clerkenwell cumulative impact policy and encourage a diversification towards non-vertical drinking establishments.</p>	<p>Support noted.</p> <p>Planning is governed by use classes. Both vertical and non-vertical establishments could fall within A3, A4 or a mix of these uses. As such the planning system is a blunt tool to control this. It should be noted however that the draft plan has a number of policies to protect and promote restaurants, cafes and other retail/leisure uses. Cumulative impact areas are part of the licensing regime, and while they can be material in terms of planning applications, this would depend on case-by-case circumstances; they are not automatically determinative.</p>
Policy BC3: City Fringe Opportunity Area	Statutory Consultee, Landowners, Resident	<p>Historic England state that policy should draw attention to need for new development to preserve and enhance contribution made to significance of adjacent conservation areas and heritage assets in neighbouring boroughs.</p> <p>TfL City Planning state that section 3.11 needs greater emphasis on the continued congestion control issues at Old Street station during the morning and evening peaks, and TfL plans that could remove these pressures in the future. They the opportunity to work with developers on providing access to the London Underground station and relieving capacity issues within the station.</p> <p>TfL City Planning recognises the importance of urban space for community and will not seek to overdevelop land within the demise of the new peninsula scheme. However, development opportunities will continue to be explored to enhance the local area and potentially enable a wider redevelopment and upgrade of Old Street station. TfL commercial development believe that Policy BC3 Paragraph H, which resists built development in the centre of the Old Street Roundabout, is overly restrictive. Whilst TfL CD support the provision of open space and recognise the significant public benefits that such spaces can bring to an area, restricting built development on the roundabout site appears detrimental to good growth policies and is not consistent with the draft London Plan and the NPPF.</p> <p>GLA comment that the APP should set out how it will contribute to the delivery of 15,500 new homes and 50,500 new jobs and how Islington will work with Hackney and Tower Hamlets to deliver this across the Tech City Opportunity Area. Islington has a low housing capacity in its part of the OA so the approach proposed in the policy, focusing on office development, is consistent with the London Plan.</p> <p>Moorfields Eye Hospital welcome identification of site for new business quarter but would suggest an element of flexibility is maintained such as potentially including residential uses (as a secondary use) to contribute to mixed and balanced communities. We also welcome the emphasis on active uses but question what is meant by 'necessary social infrastructure'. The policy would benefit from clarity on what this means.</p> <p>It is also welcome to see at paragraph 3.8 recognition of Project Oriel itself, namely the relocation of the two institutions from the Site to Kings Cross. It is correct that the two institutions are working together with the</p>	<p>The council will make add reference to this in policy BC3, and for consistency will also ensure that cross-boundary impacts are mentioned where relevant.</p> <p>Council will add reference to congestion issues in supporting text.</p> <p>The Council priority for this area is for improved public realm, public open space, and improved access to the station. This allocation is justified by the strategic location of the Old Street roundabout as the central public space of the East London Tech City Area and entrance to a major national rail link. An attractive efficient public realm is key to the success of the area.</p> <p>Reference will be added to the indicative homes and jobs target and the cross borough nature of delivering this.</p> <p>Residential uses are not considered a priority use for the Moorfields site, located in an internationally significant office area. The reference to necessary social infrastructure refers to potential for legacy uses on the site; these will be subject to further discussions. The wording does not provide any additional constraints over and above policy SC1 re: loss of social infrastructure. Support for tall buildings noted. It is not considered appropriate to include reference to land receipts in planning policy.</p> <p>Amendment will be made to refer to the residential population.</p> <p>The OA is a key location for office floorspace, consistent with the London Plan and OAPF. Part F does allow for retail and leisure uses in principle.</p> <p>The council considers that the Tall Buildings Study is robust basis for the proposed approach set out in the draft Local Plan. This approach is consistent with the draft London Plan.</p>

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		<p>ultimate aim of selling the Site. However, we would add a key point here that the receipts from the sale of the Site will be used exclusively to fund the new hospital, education and research facility at Kings Cross. We feel this is a critical point to recognise through policy.</p> <p>With regard to paragraph 3.16, we strongly support the principle of locating two or indeed more tall buildings on the Site.</p> <p>A resident registered their objection that the Opportunity Area around St Luke's Estate is not recognised as a mostly residential area.</p> <p>Landowner considers the wording of BC3 should be relaxed, to allow for delivery of complimentary retail/food and drink/restaurant uses as part of office-led schemes in accessible and prominent locations (i.e. such as Finsbury Square). Doing so will help to enhances such key areas as commercial locations within the Borough.</p> <p>Another landowner is generally supportive of the policy, but does not support limiting the location of tall buildings to the four specific sites. They suggest that the site specific identification approach is reconsidered and that the scope for the Castle House (BC48) and Fitzroy House (BC50) allocation sites to potentially accommodate a tall building are reconsidered, having regard to detailed site appraisal and analysis. Suggest amendment to highlight that the City Fringe Opportunity Area is identified as an area potentially suitable for tall buildings. Any proposal for tall buildings within the area will be considered on a site by site basis and must be fully consistent with Policy DH3 and all other relevant policies.</p>	
Policy BC4: City Road	Statutory Consultees, Landowner.	<p>Point I should stipulate new pedestrian crossings should be in line with pedestrian desire lines.</p> <p>Canal and River Trust welcome that policy BC4 supports a potential new energy centre powered by a water source heat pump - Bunhill phase 3 - at the City Road Basin. Similarly, the GLA welcomes Islington's identification of the spatial strategy area as a key location for the expansion of the borough's decentralised energy network.</p> <p>Landowner is generally supportive of the aim to optimise employment floorspace provision in redevelopment proposals, but notes that many parts of the 'City Road' area (and its surrounds) are less established commercial office locations compared to other parts of the AAP, such as Farringdon. Policy should be amended to reflect potential for mixed use development including residential. Part 'D' refers to the typology of different office functions within the City Road area. Whilst the Council may consider the 'Goswell Road / City Road junction', to be more suitable for smaller offices, we would not wish for this policy to restrict the ability of our client to promote large Grade A office floorplates as part of any potential redevelopment of Angel Gate, should they wish to do so.</p>	<p>Amended as requested.</p> <p>Re: suggestion to allow for more mixed-use development including residential, the development of business floorspace is a key priority in light of Local Plan evidence. The proposed amendments would not be conducive to maximising new business floorspace.</p> <p>Part D does not mandate smaller offices, it merely identifies them as particularly suitable; the policy acknowledges that a range of typologies are suitable along City Road.</p>
Policy BC5: Farringdon	Statutory Consultee, Landowners, Business	In relation to Part F and section 3.35 comment was made to give priority to active travel modes and not locate shared service bays and taxi ranks	Amend Part F and para 3.35 as requested. Cycle hire is encouraged by policy T1 of strategic and development management policies.

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	Improvement District, Local group	<p>in prominent locations or near active frontages. TfL also encourage provision of cycle hire docks.</p> <p>Reference to 2019 opening of Elizabeth line should be removed and wording should be in line with TfL guidance which is more ambiguous. TfL comment on Part F that shared service bays and taxi ranks should not be located in prominent locations that prejudiced active travel.</p> <p>Landowner, Picton Property Income Ltd note a predominant office redevelopment at this location could also include an element of residential. Part H should recognise the long term opportunity to bridge over the railway and a masterplan for Farringdon would be beneficial. In accordance with Policy 2.13 of the adopted London Plan, we consider that the production of a detailed masterplan for Farringdon would be beneficial to assist with the delivery of additional commercial development and public realm improvements above the railway cutting.</p> <p>A range of businesses and landowners commented London Central 1, a masterplan approach which groups together a number of sites in the area, has potential to deliver a range of LBIs priorities re: office development.</p> <p>BID welcome the specific support policy BC5 and BC6 for the importance of cultural and leisure venues within the area including the globally renowned design sector within Clerkenwell.</p> <p>Islington Living Streets closing the southern end of St John street to vehicular traffic, and creating a new public space, making use of developer contributions.</p>	<p>Reference to Crossrail opening amended.</p> <p>The Council does not object to the principle of decking over railway lines, however the planning case has not been demonstrated to the Council sufficiently to warrant any specific reference in the Local Plan. The lack of reference does not preclude such a scheme from taking place, should actual tangible detail materialise and where adverse impacts can be prevented. Policy 2.13 of the adopted London Plan relates to Intensification Areas; these designations will soon be defunct, having not been replicated in the draft London Plan.</p> <p>The LC1 project is clearly in its infancy and we do not consider that it would warrant specific reference in the Local Plan at this stage. The policies in the draft plan would not preclude such a concept coming forward in land use terms.</p> <p>The suggested St. John Street scheme would be supported in principle but would need to be funded through the S106/CIL process. There are number of schemes relating to St. John Street public realm improvements that could potentially be funded through S106/CIL in future..</p>
Policy BC6: Mount Pleasant and Exmouth Market	Landowners, Business Improvement District	<p>Reference should be made to the cultural and historic importance of the London Metropolitan Archives which attracts 30,000 visitors a year.</p> <p>LC1 landowners note that no reference is made in the Draft AAP to the sidings within the very north of the LC1 area, which sits within the Mount Pleasant and Exmouth Market Spatial Strategy Area (Policy BC6) although it is noted that Vine Street Bridge is allocated for conversion to public open space</p> <p>BID welcome the specific support policy BC5 and BC6 for the importance of cultural and leisure venues within the area including the globally renowned design sector within Clerkenwell.</p>	<p>Reference to LMA added to policy.</p> <p>Spatial strategy policies do not need to identify every specific part of an area - they demonstrate the vision for an area.</p>
Policy BC7: Central Finsbury	Statutory Consultees, Landowner	<p>TfL request that Part H includes reference to pedestrian and cycle desire lines’.</p> <p>GLA welcome recognition of scarce and highly valuable green spaces. However, the AAP should identify areas of green space deficiency and link this with the wider green infrastructure network including tree planting which has multiple benefits.</p> <p>City University support the continued use and implementation of the Northampton Square Planning Brief (2009), but suggests wording change</p>	<p>Policy amended as per TfL suggestion.</p> <p>The suite of green infrastructure policies in chapter 5 of the SDM will maximise these opportunities.</p> <p>Planning brief should still form part of any future planning assessment and the proposed wording would weaken the brief significantly.</p>

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		to give flexibility in the application of the brief, which is considered essential in order for City to continue to compete with other competing leading universities in other London boroughs and nationally.	
Policy BC8: Historic Clerkenwell	Statutory Consultees, Local group, Landowner, Business Improvement District	<p>Historic England note that reference should be made to the relevant tier 1 Archaeological Priority Areas. Development proposals should be supported by archaeological assessment and make provision for preserving, revealing and interpreting buried remains.</p> <p>TfL support paragraph 3.72 the principle of transferring underused roads and car parks into pedestrian use. This should be investigated in other areas covered by the Bunhill and Clerkenwell Area Action Plan to prioritise space road space for people, active travel and create quality public realm. Support for paragraph 3.74 related to the removal of parking to develop Clerkenwell Green into quality public space. Clerkenwell Road/Goswell Road junction also has public realm potential.</p> <p>QMUL note the aspirations to increase permeability and accessibility in this area of Historic Clerkenwell. However, the route which has been identified through the campus in Policy BC8 (Historic Clerkenwell) and as shown in Figure 3.7 (Historic Clerkenwell Spatial Strategy Diagram), depicts the proposed route through the William Harvey Heart Centre building at the northern end of the campus which would not be possible. More importantly to note is the campus is a privately-owned and due to the health and safety and operational management requirements it is imperative that QMUL retain the ability to lock and secure the site at CHSQ. It is of important concern to QMUL that promoting public access to College Green and the wider campus will not give the level of security that is required, especially in light of QMUL's aspirations for intensification of education and research uses on the site.</p> <p>GLA support recognition of heritage assets in Clerkenwell.</p> <p>BEE Midtown support the recognition of the cultural and leisure importance of Clerkenwell,</p> <p>Islington Living Streets request the implementation of the Clerkenwell Green improvements, utilising developer contributions.</p>	<p>The council will fully reflect suggested changes to ensure that the policy responds to the APA review.</p> <p>Support noted. Clerkenwell particularly conducive to further pedestrianisation but LBI would support borough wide. Policy T3 supports use of on street parking bays for parklets or cycle storage.</p> <p>The council considers that increased permeability through the site is an important aspect of any proposed redevelopment. The route indicated on figure 3.7 is considered indicative, therefore an alternative route may be appropriate. We note that proposed improvements which also entail restrictions could be suitable, dependent on appropriate justification. The allocation is worded broadly to reflect the principle of permeability, and doesn't, for example, prescribe a 24hr publicly accessible through route.</p> <p>Policy BC8 supports the implementation of the Clerkenwell Green scheme.</p>
BC1: City Barbican Thistle Hotel, Central Street	No comments received	N/A	N/A
BC2: City Forum, 250 City Road	No comments received	N/A	N/A
BC3: Islington Boat Club, 16-34 Graham Street	Statutory consultee	Canal and River Trust supports allocation	Support noted.
BC4: Finsbury Leisure Centre	Local residents	<p>A number of local residents commented on this site allocation with a range of responses, raising a variety of issues.</p> <p>Objects to requirement for positive frontage to Central Street as a means to justify over development. Open space should be preserved.</p> <p>Allocation BC4 and AAP policy BC7 Part F are inconsistent with the NPPF because housing is allocated on open space, sport and recreation</p>	<p>Positive frontage is a requirement that new development actively engages with the streetscape. Open space is to be re-provided while also re-providing the same amount of leisure floor space and four football pitches. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent.</p>

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		<p>facilities. There is already an undersupply of open space and sports facilities. Allocating housing on this popular recreational area will reduce the sports and leisure facility vital to the community whilst further reducing the open space, light and green space and is not justified by the councils supporting evidence.</p> <p>Consultation on the site suggests Category B trees on site will be cut down and new ones planted and building line of proposed flats will cut into Protected Root Area of Category A trees in St Luke's Gardens. Building height will also not be sympathetic to Grade I and II listed buildings.</p> <p>Various impacts on residential amenity were raised. It was noted in particular that daylight survey demonstrates design does not pass planning guidelines with ground floor residents on Norman Street severely affected by scale and massing.</p>	<p>The design proposals have not yet been completed and the exact area of public space has not been determined. The project aims to deliver more high quality public spaces around the new leisure centre, including a new square on Paton Street and a new open space between the leisure and residential buildings. The layout of the public spaces will also realign Norman Street and Paton Street, creating a more direct pedestrian route between Central Street and St Luke's Gardens. There will also be improved green space, new tree planting and a selection of play facilities and new seating.</p> <p>The Council wishes to retain as many good quality trees on the Finsbury Centre site as possible and will replace lost tree canopy with new planting where retention is not possible or desirable. A tree specialist and ecologist have carried out assessments and have provided advice on how the existing trees and habitat on site and in St Luke's Gardens should be protected.</p> <p>The tree specialist advised that there are no concerns about the proximity of the building and that roots and crown of the trees in St Luke's Gardens will not be unduly impacted by the proposals. This is because the proposed residential building has been positioned to match the existing distance between St Luke's Gardens' railings and the main existing Leisure Centre building. We have also been advised that in this location (10m away from the tree) it is highly unlikely that there will be significant rooting between the existing leisure centre and the squash court buildings. If any roots are found, any construction work in their proximity will be carried out under arboricultural supervision to ensure that they will be expertly pruned and protected.</p> <p>All four football pitches will be re-provided as part of the new leisure centre. Although the football pitches will reduce in size, they will remain 5-a-side pitches, and will meet Sports England standards. The draft design allows potential for two pitches to be joined together for multi-pitch use for larger events or youth coaching sessions. The draft design suggests locating the pitches away from Central Street, with the new leisure centre providing a physical buffer to vehicle pollution from Central Street. Multiple viewing points to all pitches will be created inside the new leisure centre and in the public open space/pedestrian areas.</p> <p>The Council operates strict planning standards to protect the amenity of local residents; this includes ensuring sufficient sunlight and daylight is able to penetrate into and between buildings, and that adjoining land or properties are protected from unacceptable overshadowing. An initial daylight and sunlight assessment of the impacts of the Finsbury Centre proposals onto the existing residential properties has been undertaken and will continue to be reviewed as the design develops. The final daylight and sunlight assessment will be submitted as part of the planning application and will be available to the public.</p> <p>The Council has carefully considered the appropriate development density for this area, taking into account planning policy context. The density of the proposed design is similar to the average building densities in the area.</p>

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BC5: 1 Pear Tree Street	Landowner	Request to accept submitted scheme to guide development in emerging AAP. Suggested amendments include changes to the particulars of the development in terms of floor space square metres, number of dwellings and height of building.	Site will be removed.
BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street	Statutory Consultee (GLA)	GLA comment the proposed loss of the health facility should only be considered acceptable where this is part of wider service transformation. If existing social infrastructure is considered to be redundant, full or partial use as other forms of social infrastructure should be explored in line with guidance in Policies S1 and S2 of draft London Plan.	Current planning permission for the site includes re-provision of community centre and loss of the health centre. Loss is justified as the services have been re-provided elsewhere. Policy SC1 gives strong protection to existing social infrastructure.
BC7: 198-208 Old Street (petrol station)	No comments received	N/A	N/A
BC8: Old Street roundabout area	TfL (landowner)	TfL commercial development welcome the allocation. However, reference to future redevelopment potential should be made to maximise efficient use of land in line with paragraph 122 of the NPPF. Surface level retail units could complement the public realm improvements. TfL will continue to explore development opportunities which could enhance local context and support regeneration of the station. Allocation should be amended to reflect development proposals coming forward in the future, depending upon changing market trends and thus should not be precluded from planning consideration.	The Council priority for this area is for improved public realm, public open space, and improved access to the station.
BC9: Inmarsat, 99 City Road	Statutory Consultee (TfL)	Depending on the scale of redevelopment, collaboration with TfL should be sought on opportunities to integrate with London underground station to provide capacity solutions. This should be inserted within Development Considerations.	Amended as requested.
BC10: 254-262 Old Street (east of roundabout)	No comments received	N/A	N/A
BC11: Longbow House, 14-20 Chiswell Street	No comments received	N/A	N/A
BC12: Cass Business School, 106 Bunhill Row	City University of London	The allocation and justification should remain as per the current adopted allocation, and suggests wording for the avoidance of doubt.	The council will amend the allocation and justification to note that increased teaching facilities may be suitable in certain circumstances.
BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	Landowners, resident.	<p>A landowner notes the site boundary has reduced in size by circa 250sqm from the current site allocation and should be amended. London City Shopping Centre Ltd should be identified as an owner.</p> <p>Request to add appeal decision APP/V5570/W/17/3171908 and APP/V5570/Y/17/31719111 to planning history.</p> <p>Landowner comments Allocation and Justification should be suitable for mixed use development. Further amendments should not prevent delivery of sustainable mixed use developments which have recently been approved and should not apply to any S96A or S73 applications further to extant permission.</p> <p>A resident strongly objects to the allocation listing a variety of reasons associated with the apparent impact on the quality of life of residents, including rights to light.</p>	<p>Boundary updated and ownership amended.</p> <p>Not necessary to add appeal decision references given application has been granted and is referenced in allocation.</p> <p>Allocation references extant permission. Draft allocation reflects updated evidence hence the promotion of office development. Not appropriate to exclude S73 or S96A applications from consideration.</p> <p>Hotel, office and residential development was permitted on appeal (P2016/0488/FUL) so can be implemented. If a new amended proposal came forward the council would seek office development and a variety of Local Plan policies which look to protect amenity would be used to assess any proposal. Right to Light is a legal matter and not a planning matter.</p>
BC14: Peabody Whitecross Estate, Roscoe Street	Resident	Resident expressed concern about history of engagement with Peabody. Also, objection is made to the conversion of green space behind and around Peabody Court into recreational space which could impact on privacy. Objects to the proposed football pitch and outdoor gym by Peabody Tower for amenity and privacy reasons. Play space outside	The site allocation does not stipulate that recreational uses must be provided on site. The allocation calls for improved public open space and design measures to improve the definition between public and private space. The Council will assess any proposals for recreational uses based on their merits. The Council has not received any formal applications for

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		Peabody Court could block vehicle access frequently used by disabled and older residents, deliveries and trades people. Clear boundaries need to be set so nearby workers do not litter.	recreational uses (including sports pitches or outdoor gyms) on this site. The Council will assess the amenity impact of the proposal to ensure that neighbours' amenity would not be unacceptably impacted including with regard to noise, anti-social behaviour or light pollution.
BC15: Richard Cloudesley School, 99 Golden Lane	No comments received	N/A	N/A
BC16: 36-43 Great Sutton Street (Berry Street)	Landowner	Support inclusion of the site. However, complementary uses to the office led development are desired. Policies BC8 and SP1 support a mix of uses to diversify the cultural, retail and leisure offers. Draft London Plan Policy SD5 also encourages mixed use office/residential proposals in the CAZ.	The building is currently a business use and is located in an area where this is a priority. Policy BC1 would allow 20% of floor space to be non-office use.
BC17: Caxton House, 2 Farringdon Road	No comments received	N/A	N/A
BC18: Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street	No comments received	N/A	N/A
BC19: Farringdon Place, 20 Farringdon Road	Landowner (individually and part of group of landowners in area)	Landowner support the allocation for intensification of business use. Landowner notes ownership is with Derwent London Group and not Network Rail. London Central 1 strongly support the principle of employment led development.	Support is noted and ownership details will be amended.
BC20: Lincoln Place, 50 Farringdon Road	Landowner (individually and part of group of landowners in area)	The Landowner requests amendments relating to: removing reference to Lincoln Place from address; change the site boundary to cover railway line; add Picton as long leaseholders on site ownership details; add reference to decking over railway in site allocation. London Central 1 strongly support the principle of employment led development.	Address information will be amended and Picton identified as leaseholders. Site boundary will not be amended given amendment relates to the decking over issue which will not be reflected in the AAP (hence allocation will not mention decking over either).
BC21: Former Petrol Station, 96-100 Clerkenwell Road	No comments received	N/A	N/A
BC22: Vine Street Bridge	No comments received	N/A	N/A
BC23: Guardian Building, 119 Farringdon Road	No comments received	N/A	N/A
BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue	No comments received	N/A	N/A
BC25: Mount Pleasant Post Office, 45 Rosebery Avenue	No comments received	N/A	N/A
BC26: 68-86 Farringdon Road (NCP carpark)	No comments received	N/A	N/A
BC27: Finsbury Health Centre and Pine Street Day Centre	Statutory consultee, Landowner	Historic England recommend any proposal for the site is required to address the fact the Health Centre is on the Heritage at Risk Register 2018. NHS Property Services own the Finsbury Health centre but commented that the Pine Street Day Centre is not within their ownership despite being included within the allocation. Thus it should be deleted or the owner of the site should be identified.	Amendment will be made reflecting at risk status. The Council will identify the ownership details of the Pine Street Centre separately. The Council considers any blanket reference to enabling development would undermine the allocation and policy SC1. No amendment will be made.

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		<p>NHS PS comment that the Site Allocations Document should be used to support the principle for enabling of development to fund cost of renovation and repairs to the listed building</p> <p>The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services from modern and fit for purpose facilities is crucial. Given that there is very careful oversight from NHS England and CCGs to ensure sufficient services are provided, and that the estate is fit-for-purpose, additional protection through planning policy should be unnecessarily in relation to public healthcare facilities. Notwithstanding this, BC27 should be appropriately qualified so that it does not present an unnecessary or unreasonable hurdle to health service provision reconfiguration. As such, the plan can be made sound through the inclusion of additional supporting text which states that loss of facilities may be acceptable in certain circumstances..</p>	<p>Protection of healthcare facilities through planning policies is necessary and justified; relying on a separate process would not ensure full protection. Policy SC1 already provides the requested flexibility. The Council has a duty to protect the Grade II listed building; the use itself is fundamental to the listing hence the Council will seek to retain this use as far as possible.</p>
BC28: Angel Gate, Goswell Road	Landowner	<p>Landowner considers that the inclusion of a supporting element of residential use, as part of commercial-led mixed-use schemes in less established office locations, is consistent with Policy 4.3 within the London Plan as well as Part 'D' of Policy SD5 'Offices, other strategic functions and residential development in the CAZ', within the Draft London Plan.</p> <p>They also consider there is scope for comprehensive redevelopment of the site and highlight planning application for residential-led scheme on adjacent site, planning ref: P2014/3572/FUL.</p> <p>Respondent cites current Site Allocations and Finsbury Local Plan DPD inspectors reports as evidence for allowing residential uses at this location.</p> <p>Suggests change to ownership details.</p>	<p>The development context has changed significantly since the adoption of the current Local Plan, including a large increase in projections for new jobs which the new Local Plan must seek to address. The Angel Gate site is considered to be a significant opportunity for intensification of office, reflected by the wording of the draft allocation. The respondent has not looked at the most up to date version of draft London Plan policy SD5, and the analysis relating to this is therefore incorrect; see response to policy B2 for further details.</p> <p>The planning application referred to remains extant but it should be noted that the planning committee resolved to grant a subsequent application (planning ref: P2018/0429/FUL), with more office floorspace and significantly less residential, in July 2018, subject to legal agreement. This is a clear demonstration of the potential for intensification of office on this site and in the vicinity.</p> <p>Ownership details will be updated.</p>
BC29: Taylor House, 88 Rosebery Avenue	Landowner	Landowner of the site pleased to see the site included.	Support is noted.
BC30: Telfer House, 27 Lever Street	No comments received	N/A	N/A
BC31: 112-116 Old Street	No comments received	N/A	N/A
BC32: Monmouth House, 58-64 City Road	Landowner	Landowner notes planning permission for redevelopment is being implemented so questions whether it should be included in the plan.	The Council considers sites with permission that have been implemented are still appropriate for allocation as site circumstances may change.
BC33: Oliver House, 51-53 City Road	No comments received	N/A	N/A
BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street	No comments received	N/A	N/A
BC35: Finsbury Tower, 103-105 Bunhill Row		Landowner is generally supportive of the allocation. However, some minor clarifications have been suggested. A subsequent Section 73 application was granted to optimise the scheme in 2018 (ref: P2017/4939/S73) and this should be reflected in the planning history.	<p>Reference to planning application just relates to how the site was identified and does not require all extant permissions.</p> <p>Allocation is for intensified office use. Breakdown of uses permitted by extant permissions is not necessary. Policy BC1 allows other uses to be developed as part of the 10% non-office floor space.</p>

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		<p>The principle of residential development in addition to B1 office for current and previous uses should be reflected.</p> <p>Planning permission for flexible A1/A3 use at ground floor should also be addressed in existing and previous uses for the site given the scheme will be implemented ahead of the draft Local Plan being adopted.</p>	
<p>BC36: Finsbury Business Centre, 40 Bowling Green Lane</p>	<p>Landowner, GLA</p>	<p>Landowner notes that current site name does not reflect usage of the site, 75% of the area is used by London Metropolitan Archives.</p> <p>Allocation and justification should include expansion of cultural use as part of business intensification. Site designation and constraints should mention the site is in Clerkenwell and Farringdon Cultural Quarter. Ongoing operation of London Met Archives may include future development for cultural use as the archive continues to grow alongside community engagement.</p> <p>The GLA commented the site is industrial in nature so no net loss of industrial capacity would apply. If developed as mixed use, industrial floor space should be re-provided.</p>	<p>Name of allocation will be amended. Amendment also made to allow expansion of existing cultural uses linked to LMA and reference to Cultural Quarter will be made.</p> <p>The site is existing B1 space so no net loss of industrial space would not apply.</p>
<p>BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street</p>	<p>No comments received</p>	<p>N/A</p>	<p>N/A</p>
<p>BC38: Moorfields Eye Hospital</p>	<p>Statutory Consultee, resident, landowner.</p>	<p>Landowner of the site welcome recognition of significant business floorspace capacity and comprehensive redevelopment. Residential uses should not be discounted in the interest of creating mixed communities given the size of the site. There needs to be an acknowledgment that the site is inextricably linked to a new world class hospital, research and educational facility. LBI should acknowledge the facilitating nature of development at the Site within the site allocation. With the facilitating nature of the development in mind, it is suggested that the Development Considerations in the site allocation should be less prescriptive, such as the wholesale retention of all historic buildings, particularly given state of many of these buildings behind their facades. It may also be premature to set out development patterns of streets, public spaces and internal links.</p> <p>Whilst the allocation of heights is welcomed as recognition of the Sites capacity to host taller elements, significant further work needs to be undertaken to ascertain the exact locations and heights of these components. It is suggested retaining the allocation for two taller elements but noting that the suggested heights and locations are indicative.</p> <p>A resident objects to the allocation and wants to see it developed for social housing or low cost housing. Also questions why a tall building is proposed. The plan seems to encourage a visiting workforce and local people to move out. Other tall buildings nearby are luxury apartments and are pricing people out.</p> <p>The GLA support the allocation citing its potential to contribute to the delivery of opportunity area jobs target.</p>	<p>Support noted. Residential uses are not considered a priority use for the site. It is not appropriate to acknowledge the facilitating nature of the development within the allocation itself, as it would undermine local planning objectives. The parameters set out are not considered overly prescriptive. Approach to tall buildings is underpinned by comprehensive evidence and the GLA have noted the approach conforms with the draft London Plan.</p> <p>The surrounding area does have several housing estates but has an overarching commercial character. Council evidence suggests there is a significant need for new office development and the site can contribute significantly to meeting this need. The site's identification as suitable in principle for tall buildings has been arrived at through rigorous assessment. Any tall building will be assessed against policy DH3 including assessment of the impact of character, amenity, light and any other impacts will be taken into consideration.</p>

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BC39: Laser House, 132-140 Goswell Road	No comments received	N/A	N/A
BC40: The Pentagon, 48 Chiswell Street	No comments received	N/A	N/A
BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 & 21-23 Leonard Street	No comments received	N/A	N/A
BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road	No comments received	N/A	N/A
BC43: Easy Hotel, 80-86 Old Street	Landowner	Respondent feels allocation identifying P2015/2680/FUL is misleading as a subsequent application has been approved. Support for reference to refurbishment. However, should the building be redeveloped in the future support should be given for ongoing hotel use.	Reference to planning application just relates to how the site was identified. Allocation will be amended to allow for re-provision of hotel use as part of an office led scheme.
BC44: Crown House, 108 Aldersgate Street	No comments received	N/A	N/A
BC45: 27 Goswell Road	No comments received	N/A	N/A
BC46: City, University of London, 10 Northampton Square	Landowner	The allocation and justification should remain as per the current adopted allocation. Consider that the 'development considerations' section should give flexibility in terms of addressing the planning brief.	Council will amend allocation and justification to note increased teaching facilities may be suitable in certain circumstances. However, the proposed change to the development considerations would weaken the brief significantly.
BC47: Braithwaite House and Quaker Court, Bunhill Row	No comments received	N/A	N/A
BC48: Castle House, 37-45 Paul Street	Landowner	BC48 and BC50 should be merged into a single allocation because they are two wings of the same building and one would not be developed without the other, especially now under one owner. Also there is greater development potential being merged. Landowner finds tall building assessment not robust and overly restrictive. Design of tall buildings not adequately considered; 3D models are too basic; approach does not account for changing context process is too broad to discount so much of the borough.	Allocation will be merged. The council agrees that greater development potential could be realised as a result, although we note that this site is not considered suitable for a tall building over 30m. Given the site area, there is likely to be significant scope for intensification below 30m in any case. Approach to tall buildings is plan led in line with draft London Plan as stated by GLA. Achieves a balance between minimising impacts while identifying suitable opportunities
BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane	Statutory Consultee	Site is industrial in nature. There should be no net loss of industrial floor space capacity in line with draft London Plan policy E4. Where the site is to be redeveloped for mixed use, industrial floor space capacity should be re-provided in line with policy draft London Plan policy E7.	Amendments to policy B3 reflect London Plan no net loss of industrial. Allocation will also be amended to reference intensification of industrial space (B1c)
BC50: Fitzroy House, 13-17 Epworth Street and 1-15 Clere street	Landowner.	See comments on BC48.	See comments on BC48.
BC51: Italia Conti School, 23 Goswell Road	No comments received	N/A	N/A
BC52: Queen Mary University, Charterhouse Square Campus	Statutory Consultee, Landowner	Historic England note need to review site designations and constraints against the new Archaeological Priority Areas. Site BC52 (Queen Mary University, Charterhouse Square Campus) is likely to be particularly	The council will fully reflect suggested changes in relation to the APA review. Allocation amended to encourage GLAAS pre-app.

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		<p>sensitive and pre-application consultation with GLAAS is strongly recommended.</p> <p>Landowner, Queen Mary University support allocation. However, they request that the uses include the following: higher education (academic and ancillary floor space; medical research; offices; research facilities (B1b or Sui Generis). Allocation should refer to redevelopment of existing buildings. Objection to new pedestrian route on Figure 3.7 due to operational requirements and health and safety and future expansion. Intensification of research facilities will likely see student accommodation repurposed and existing student accommodation relocated to Whitechapel.</p>	<p>Current allocation states 'higher education, medical and research uses'. Policy will be amended to add 'Development on the site may include some office space (B1a) and research space (B1b) linked to the overarching higher education, medical, and/or research use.' Permeability of any site is important but Figure 3.7 is indicative so alternative routes may be appropriate. A 24hr publicly accessible through route is not prescribed.</p>
BC53: Travis Perkins, 7 Garrett Street	Statutory consultee, Residents group, Business	<p>GLA deem the current use to be industrial in nature so no net loss of industrial floor space should apply in accordance with draft London Plan policy E4. Introduction of non-industrial uses should follow draft London Plan policy E7.</p> <p>Business, Travis Perkins Plc note that the existing use should be recorded as sui generis builders' merchant in order to ensure it is fully protected and will be re-provided in any future intensification of the site as intended by the allocation. This is a serious matter as it means that the existing lawful use is not afforded any protection by the emerging policy as it is currently written. Respondent cites case law in support of point.</p> <p>A residents group notes the site boundary is incorrect and object to allocation for intensification of business use. This would have an adverse effect on surrounding residential amenity during and after construction and would see a loss of open space.</p>	<p>Amendments to policy B3 reflect London Plan no net loss of industrial. Allocation will also be amended to reference intensification of industrial space (B1c)</p> <p>Amend use as suggested, although it is notes that Sui Generis industrial uses are protected under Policy B3.</p> <p>Boundary will be amended as per Land Registry plans. LBI consider the site suitable in principle for intensified business use. The scale of development would be assessed against policies relating to residential amenity for example policy DH5 (agent of change). The Council will also protect the historic and architectural character of the Grade II listed building. Additionally, Policy T5 requires all development to comply with best practice for construction.</p>
BC54: Sycamore House, 5 Sycamore Street	No comments received	N/A	N/A
BC55: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street	No comments received	N/A	N/A
Appendix 1: Heritage assets in Historic Clerkenwell	Statutory Consultee (Historic England)	Appendix 1 refers to Policy BC7 when it should refer to BC8.	Noted. Error will be amended.
General comments	Statutory consultees, Landowners, Local Group and organisations, Residents.	<p>University Arts of London suggest the LCF Golden Lane site is included in the Site Allocations or Bunhill and Clerkenwell AAP as it is being considered as part of a rationalisation programme.</p> <p>Historic England note the need to review site designations and constraints against new Archaeological Priority Areas (APA). Support for identification of heritage assets. However, many Conservation Area Management Plans are over ten years old. An update would therefore reflect current policy and guidance, particularly in reference to setting.</p> <p>Historic England also request 'at risk' heritage assets be identified and that development proposals should seek to address negative factors that contribute to 'at risk' status.</p>	<p>A site allocation on the proposed site is suitable although the loss of social infrastructure would need to be justified. Priorities of the AAP suggest the site be used for office use.</p> <p>Changes will be made to respond to the APA review. The council intends to update the Conservation Area guidance and the characterisation study currently being prepared will, in part, assist with this.</p> <p>Amendment made to policy DH1 which will apply in AAP area, so further change to AAP itself is not necessary.</p> <p>Relevant changes will be made re: references to Elizabeth Line.</p>

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		<p>TfL support the AAP approach. Reference should be made to the Elizabeth line instead of Crossrail.</p> <p>Local organisation queries why the area to the north of the AAP (Pentonville Road, Penton Rise, King's Cross Road) is excluded from the AAP when there are acute urban problems here.</p> <p>Landowner, Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology. Project Oriel seeks to build a new eye hospital at the St Pancras Hospital site. Support for encouragement of commercial uses in the area. Support for the extension of the City Fringe Opportunity Area boundary.</p> <p>A resident comments that Clerkenwell would benefit from a higher diversity of A1 retail, not just high end showrooms.</p> <p>A resident objects to the consultation process and requests a specific meeting for residents of a particular estate.</p> <p>A resident finds the intensification of development overwhelming for a residential area and there is a need for more social and affordable housing.</p> <p>Landowner comments on fairly minor intended works for a specific site, which may also include residential development.</p> <p>A resident requests the building of more family sized social housing.</p> <p>Group of landowners pursuing the London Central 1 plan consider the Local Plan review provides a significant opportunity to further develop our shared vision for the area and that the LC1 concept could deliver very significant public benefits.</p> <p>Local group note that a great public realm is vital to attract business and young creative people</p>	<p>The area mentioned by the respondent is predominantly residential, thus inclusion in the AAP would not be justified. However, several policies in the SDM document would address the issues raised.</p> <p>The council does not have the power to control specific A1 retailers.</p> <p>The council initially consulted for 8 weeks (2 more than the statutory minimum, to cover the Christmas period). We subsequently extended the deadline for over a week to allow for late comments. We also ran drop-in sessions at the start and end of the consultation period, and publicised the consultation extensively. We consider this was more than sufficient to allow for a full range of comments to be received.</p> <p>The CAZ has a greater density, scale and mix of uses than other solely residential parts of the borough. A number of policies require affordable housing and workspace, high quality design and protection of residential amenity where residential development comes forward.</p> <p>Details of proposed works noted. The scale of development proposed would not warrant a site allocation. In the AAP area the council would seek office led development if the loss of the social infrastructure was justified.</p> <p>Size mix priorities for housing have been derived from local evidence and set out in Policy H2.</p> <p>As noted in response to comments on policy BC5, The LC1 project is clearly in its infancy and we do not consider that it would warrant specific reference in the Local Plan at this stage. The policies in the draft plan would not preclude such a concept coming forward in land use terms.</p>