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By post and email: planningpolicy@islington.gov.uk

18th October 2019
Our ref. HGHP0300

Dear Sir / Madam

Islington Local Plan Proposed Submission (Regulation 19)

These representations have been submitted on behalf of London & New York Ltd. and outline our objections to the Regulation 19 Local Plan as submitted.

By way of context, the emerging London Plan and national planning policy both seek to make the most effective use of sustainable brownfield sites in order to boost significantly the supply of new homes and meet objectively assessed needs. In particular, mixed-use developments are strongly encouraged in cities such as London where land is scarce and needs to be used to full potential.

In light of this, whilst there is support for the continued allocation of the land at Highbury and Islington Station (particularly the recognition of the potential to deck over the existing railway lines and build above the tracks), the Regulation 19 Plan substantially underplays the site's redevelopment potential.

It has already been identified in the Council's Tall Building Study prepared by Urban initiatives in November 2018 as a potentially suitable location for two local landmark buildings (equivalent to 12 storeys) either side of the station to help mark it as a major transport node. However, we contend that there is scope for a taller building or buildings in this location for the following reasons:

a) It is a PTAL 6b location (i.e. one of the most accessible locations in London by public transport);
b) It is a major transport interchange and thus a focal point for intensification;
c) There are no strategic or local viewing corridors that cross the site;
d) There is an existing 15-storey tower on the eastern side of the roundabout; and
e) It is not within a Conservation Area and there are no listed buildings within the immediate vicinity.

The site therefore has the potential, and should be considered for, a tall tower subject to design consideration, to take account of its accessible and strategic location. This intensification also allows for a greater mix of uses by enabling the site to accommodate not just retail and office uses, but residential too, which the NPPF states plays an important role in ensuring the vitality of town centres.

Despite supporting in principle the continued allocation of the site, given the above objections, we contend that the Regulation 19 Plan is not "sound" within the terms of the NPPF as it has not been positively prepared, justified nor is it consistent with national policy.

I trust that these representations will be taken into account moving forward.

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Yours faithfully

Matthew Robinson
Associate Director