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15 October 2019

Dear Sir/Madam,

[Islington Local Plan Proposed Submission \(Regulation 19\)](#)  
[Site Allocations document](#)  
[Site NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road](#)

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This representation is submitted on behalf of our client Kawal And Nancy International Limited to the Regulation 19 Islington Local Plan Proposed Submission development plan Site Allocation document. The Site Allocations document sets out site specific policy for a number of sites across the borough which will contribute to meeting development needs. This representation is in relation to site allocation NH1 *'Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road.'*

Our client owns the Nag's Head Market at 16-22 Seven Sisters Road. The site incorporates the shops along Seven Sisters Road and the Nag's Head market building to the rear. Our client fully supports the principle of the site allocation, however proposes to amend the wording of the allocation slightly as well as add points of clarification. A plan of the allocation and our client's land ownership is below.

[Image 1: Nag's Head Market site ownership](#)



Image 2: proposed site allocation NH1 (Regulation 19)



Site NH1 was previously allocated within the June 2013 adopted Islington Site Allocations document, stating the site had potential for a retail-led mixed-use development with other employment uses, and the potential for enhancing the family friendly evening economy. Residential accommodation also was considered to be acceptable on the upper floors subject to amenity issues being addressed. Improving the existing market was also encouraged. The estimated timescale for delivery was 2017-2021. To date, there has not been a planning application submitted on this site for comprehensive redevelopment.

Image 3: adopted site allocation June 2013



Regulation 19 Site Allocation document September 2019

### Building height

The proposed site allocation NH1 boundary has not changed since 2013, nor have the allocated land uses, however since 2013, the Islington Tall Buildings Study has been published and as such a development consideration for the allocation now brings the findings of the Study into the allocation, stating:

*The Islington Tall Buildings Study suggests that the site at 8-32 Seven Sisters Road and backland on Hertslet Road offers an opportunity for the development of a local landmark building of up to 15 storeys (46m) in height. A tall building should provide a notable height accent, marking the intersection between the two main retail streets, Seven*

*Sisters Road and Holloway Road. It should be set back from the Seven Sisters Road frontage to avoid overdominating the street and respond appropriately to the listed building opposite.*

Upon review of the Islington Tall Buildings Study it is not clear how the figure of 15 storeys (46m) has been justified. The Study states that a tall building in this location will provide a notable height accent, will enhance or terminate views along main approaching corridors, and support local legibility and wayfinding to the centre. The Study offers computer generated images of what a building of this height might look like in context, however it is not apparent that a detailed study has been carried out into the impact of a building of an alternative height. It is therefore considered that the evidence base has not provided a robust justification for the capped height within the draft allocation. Consequently, the 15 storeys (46m) maximum height appears to be somewhat arbitrary.

In any event, fixing the maximum height of a tall building on this site at 15 storeys (46m) limits opportunity for flexibility in the way in which the site could be developed. When assessing the suitability of a tall building on a particular site, the assessment should be based on the quality of the proposed design, and the associated amenity and townscape impacts, as opposed to primarily fixating on a development being a certain height.

It is therefore suggested the wording of the allocation is revised to allow for flexibility in the height of the tall building:

*The Islington Tall Buildings Study suggests that the site at 8-32 Seven Sisters Road and backland on Hertslet Road offers an opportunity for the development of a local landmark building ~~of up to 15 storeys (46m) in height~~. A tall building should provide a notable height accent, marking the intersection between the two main retail streets, Seven Sisters Road and Holloway Road. It should be set back from the Seven Sisters Road frontage to avoid overdominating the street and respond appropriately to the listed building opposite.*

#### *Land ownership*

The other element of the allocation that has changed since 2013 is the estimated timescale for redevelopment, now estimated as 2021/22-2025/26. Pushing back this timescale by Islington is indicative that interest in developing the site comprehensively has not manifested in the way the original site allocation intended. It is considered that this is in part due to the complex land ownership constraints of the site, which is in mixed private ownership. Multiple landowners inevitably make comprehensive redevelopment of the entire site more challenging.

Our client, the landowner of the Nag's Head Market, is in a position to progress with a major planning application on their site in accordance with the site allocation land uses and intends to regenerate the existing market. However, the constraints of the allocation will affect and has affected the deliverability of the site allocation. It is important to note that issues affecting deliverability of key site allocations is a consideration that local authorities should use to determine whether a plan or plan policies should be updated (Planning Practice Guidance paragraph 65 reference ID: 61-065-20190723).

It is therefore suggested the wording of the allocation is revised to allow for piecemeal development to take place across the site. By allowing piecemeal development it will better realise the vision for the site in a more efficient way. This highly sustainable site has remained undeveloped despite the allocation which is in part likely to be due to the land ownership constraints, so providing greater clarity to this aspect of the allocation to allow for landowners to progress with their own planning applications will enable the development potential of the site to not be prejudiced by multiple parties working together. It is suggested the following wording is included in the allocation:

*Piecemeal development of individual sites within the allocation may be appropriate as long as they don't prejudice the delivery of the adjacent sites within the allocation.*

I trust the above is clear and the suggested amendments to the site allocation NH1 will be considered, however please don't hesitate to get in touch should you wish to discuss any of the above.

Yours sincerely



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Georgia Barrett  
Senior Planner

cc: Kawal And Nancy International Limited  
ref: 00790 Nag's Head Market