

# THE ISLINGTON SOCIETY

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## Response to Consultation on

### Islington Local Plan

### Strategic and Development Management Policies : Regulation 19

September 2019

October 2019

Please refer to the Islington Society's comments on our comments the November 2018 Regulation 18 Consultation, tabulated with our response to the Draft Regulation Consultation as follows

January 2019 Comment	October 2019 Comment
<p>1. Locally Listed Buildings</p> <p>We are committed to the protection of the environment of Islington and its heritage, and to enhancing the quality of design in the borough.</p> <p>We are especially aware of the wealth of locally listed heritage assets (in addition to the statutory listed ones), thanks to the current review of the local list. In this respect, the sub-reference to locally listed buildings and shopfronts in policies DH1 Part E &amp; DH2 Part D is welcome. We would like to see this strengthened by a wider reference to and definition of "local listed buildings and shopfronts and other non-designated assets" in the second point in the Site Appraisal and Design Process core statements in Para 1.59 [incidentally, there is a typographical erroring that section : it should read "non-designated" not "non-undesigned"]</p> <p>However, we are also aware from the local list review of the large number of locally listed shopfronts, especially those outside conservation areas, that have been lost. We would like to see a statement in Policy DH2 Part D noting that the council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts-undesigned"]</p> <p>Recommendation:</p> <ol style="list-style-type: none"> <li>Change "non-undesigned (<i>sic</i>) heritage assets" to "non-designated heritage assets (including locally listed buildings and shopfronts)" in Para 1.59.</li> <li>Add "The council will be vigilant in preventing unauthorised loss of listed buildings and non-designated assets, including locally listed shopfronts" to Policy DH2 Part D.</li> <li>Add "C. Locally Listed Shopfronts will be protected and the council will be vigilant in preventing unauthorised loss of locally listed shopfronts" to Policy DH7.</li> </ol>	<p>Locally listed buildings</p> <p>We welcome the rewording of policy DH2 Part I to strengthen the significance of Locally Listed Buildings and shopfronts</p> <p>We welcome the inclusion of a definition of non-designated heritage assets in Appendix 9: Glossary and abbreviations</p>

<p>2. Sustainable Buildings 1 : Building Life expectancy</p> <p>We note that Policy H11 Part B iv refers to “the lifetime of the building” as “generally not less than 50 Years”. The general residential building stock in Islington is more than 125 years and looks set to survive and be revived into the foreseeable future. From this perspective, a suggested lifetime of not less than 50 seems modest.</p> <p>A statement of the expected longevity of the residential building stock should be included in Section 6 : Sustainable Design. Policy S3 Sustainable Design Standards would be a suitable location. We suggest a life of greater than 75 years</p> <p>Recommendation: Add Section I to Policy S3, “All Residential and non-residential building should be capable of an expected life of greater than 75 years”</p>	<p>Sustainable Buildings 1 : Building Life expectancy</p> <p>Based on the life-time use of existing stock, we continue to recommend a sustainable lifetime of greater than 75 years</p> <p>Recommendation: Add Section I to Policy S3, “All Residential and non-residential building should be capable of an expected life of greater than 75 years”</p>
<p>3. Sustainable Buildings 2 : Zero Carbon</p> <p>Policy S1 Part B is ambiguous. It refers variously in the text to “design”, “development” and “construction”. This implies that the policy is specifically applicable to new-build construction. In this respect, therefore, it cannot be inferred that “all buildings in Islington” will be zero carbon. An aspiration to apply zero-carbon status to the existing building stock by any deadline date is laudable but unrealistic.</p> <p>In that case, the stated deadline for design, development and new construction is too long and should be changed to 2025.</p> <p>Recommendation: Change “all buildings in Islington will be zero carbon by 2050” to “all new buildings in Islington will be zero carbon by 2025”</p>	<p>Sustainable Buildings 2 : Zero Carbon</p> <p>Policy S1 Part B does not differentiate between New Buildings and Existing Building Stock New buildings should aim higher.</p> <p>Recommendation: Add after “all buildings in Islington will be zero carbon by 2050”, “and all new buildings will be zero carbon by 2025”.</p>
<p>4. Buy-to-Leave</p> <p>The phenomenon of buying residential property and leaving it vacant for investment purposes has become-all-too familiar. It is wholly unwelcome and militates against Thriving Communities. The Local Plan should make it clear that this is entirely unacceptable.</p> <p>Recommendation: Add: “The council will take action to prevent leaving residential premises vacant (so-called Buy to Leave)” to policy H1.</p>	<p>Buy-to-Leave</p> <p>Covered by Policy H2 Part H</p>
<p>5. Basements</p> <p>The Islington Society is sensitive to the significant adverse impacts that basement development has on neighbouring properties and the wider area. Whilst we recognise and</p>	<p>Basements</p> <p>The policies remain unchanged. This comment by the Islington Society</p>

<p>support the statement in Policy DH1 Part H that “any development involving basements will be strictly controlled”, the Islington Society’s position is that basement developments should not be permitted.</p> <p>Recommendation; That the Local Plan reflects a presumption that basement developments should not be permitted. Thus: a. Take out Part A and insert it as new item (i) to Part D. Renumber part D items (i) to (vii), renumber Parts to A to C. b. Change current Part B introduction from “The Council will only permit basement development where it is demonstrated ....” to “The Council will not permit basement development unless it can be demonstrated ....”</p>	<p>remains unchanged in response.</p> <p>We do not agree with the comments in the consultation Statement p.91. There should be a presumption <i>against</i> basements.</p> <p>Recommendation: Change “The Council will only permit basement development where it is demonstrated ....” to “The Council will not permit basement development unless it can be demonstrated ....”</p>
<p>6. Tall Buildings</p> <p>The Islington Society regrets and does not support the continued proliferation of tall buildings across the borough because of their adverse effect on the character and environment of Islington.</p> <p>We would prefer para 3.1.5 of the 2011 Plan</p>	<p>Tall Buildings</p> <p>No further comment</p>

Additional comments on:

Chapter 7: Public Realm & Transport

Policy T1 Enhancing the public realm and public transport

The most salient and welcome words in this section appear in paragraph 7.1: the reference to a reduction in travel distances. This is so important it must appear in the policy itself, not merely in the notes of explanation.

If it were followed, the Borough would not be supportive of Crossrail 2 in the terms used in paragraph 7.10. The originally safeguarded scheme was designed to reduce the need to travel by reducing the distances travelled on routes between one place and another, by the provision of new interchange points. This interchange of passengers would free space on overcrowded trains and facilitate the use of existing services at stations close to central London. It also brought Hackney and East Islington as close to central London and the west end as places a comparable distance away, in terms of travel time. Specifically in Islington, it relieved overcrowding on the Victoria line between Highbury and King’s Cross and on the Great Northern electric line between Essex Road and Moorgate. The Council should continue to press for a metro scheme between north-east and south-west London with a station at Essex Road, rather than an ever longer distance project predicated on the misguided belief that property developers in places beyond the Greater London Boundary would fund such a project in return for the benefit it would derive.

Islington needs to plan for jobs and homes to be closer together, but also to work with neighbouring Boroughs and the GLA to ensure that the same applies across London.

#### Policy T2 Sustainable Transport Choices

A. The “negative impacts” need to be prevented and those which have happened in the last ten years reversed. Mitigation is not sufficient.

F (iii). The reference to interchange is welcome but it has not been born out in practice. Interchange at Archway and Highbury Corner is significantly more difficult and unwelcoming, particularly for residents of Haringey and Hackney respectively. It seems likely that, to a lesser extent, the same will be true at Old Street. Bus passengers from New North Road (four bus routes) wishing to transfer to the Underground will face a longer walk and the need to cross one of two major roads – at present no road crossing is necessary though the pavement width is inadequate.

F (v) Again the reference to bus stop siting is welcome, but is not followed in practice. When these roundabouts previously operated with two way traffic, buses stopped at the junctions directly adjacent to the station entrance. The justification for not doing that now is that there is so much more traffic. That is precisely why we need to reduce traffic. A seamless interchange would make public transport more attractive than private cars.

G We welcome the emphasis on minimising non-sustainable modes, rather than maximising trips by sustainable mode. However, all the supporting commentary focuses on cycling and walking and there is little mention of public transport. There will be 32 million trips a day by 2041 if TfL projections are correct. 17 million will pass through inner London (TfL evidence to the London Plan EiP, fig. 77.2) and 7 million through Central London. This means well over a million trips a day in or through Islington. Even with a three fold increase in cycling and a small increase in walking, the vast majority of these will be made either by public transport or non-sustainable means. The Plan should contain proposals to ensure that it is the former.

#### Policy T3 Car free development

This is broadly welcome but the journeys that could equally well be made by bus, or a combination of bus and rail should be promoted in preference to car clubs (policy T3H).

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