

Spatial Planning and Transport  
Islington Council  
Town Hall  
Upper Street  
London  
N1 2UD

17<sup>th</sup> October 2019

Dear Sir / Madam

**ISLINGTON DRAFT LOCAL PLAN REGULATION 19 CONSULTATION  
REPRESENTATIONS FROM BRANDON ROAD N7 IN RESPECT OF 'STRATEGIC AND DEVELOPMENT  
MANAGEMENT POLICIES DPD' - SEPTEMBER 2019**

We write in response to the Council's consultation regarding its proposed Regulation 19 draft Local Plan published in September 2019.

Tileyard Estates owns 20 Tileyard Road as well as operates Sands Catering business from the property which is located within the Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS) and we write to register our **objection** to the local planning authorities proposed draft policies for the area.

We consider the draft policies will significantly damage and undermine the economic and employment potential of our land-holdings and will result in an inefficient use of land contrary to sustainable development objectives. The key principle of planning policy is to secure sustainable patterns of development, including through the more efficient use of previously developed land.

The draft London Plan (July 2019) states at Policy E4 that the retention, enhancement and provision of additional industrial capacity should be planned, monitored and managed to ensure there is 'no net loss of industrial floorspace capacity' within designated areas (including LSIS). Following on from this, paragraph 6.4.5 defines 'industrial floorspace capacity' as, *"either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% per cent plot ratio (whichever is the greater)"*.

This approach is also supported by the local planning authorities Employment Land Study which states that *"at the very least, there should be a no net loss of employment space: this should be the minimum position. Ideally, we would prefer to see efforts to intensify uses and being flexible about what user classes are permitted in what space"* (paragraph 6.2.39). And that, *"opportunities should be sought for intensification of business uses on the LSIS, particularly through the provision of hybrid space"* (paragraph 8.7.2).

Further to Paragraph 82 of the NPPF additional commentary is set out in the Planning Policy Guidance note dated 22 July 2019;

*“How can the specific locational requirements of specialist or new sectors be addressed?”*

*When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities.*

*These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors.*

*Paragraph: 032 Reference ID: 2a-032-20190722 Revision date: 22 07 2019”*

We are concerned that there has been no clear an obvious engagement by the Council with local business and occupiers in this area. Further to this, the approach set out in draft Local Plan Policy SP3, which seeks to restrict the amount of B1(a) business space in the area, will result in an inefficient use of land contrary to sustainable development objectives, and in a manner that is not consistent with either the draft London Plan nor the Council’s evidence base.

We consider that the draft policy should be re-drafted to fall in line with the NPPF and with the approach taken in the draft London Plan as well take proper account of the Council’s own, albeit thin evidence base.

Draft Policy SP3 also proposes a blanket restriction that buildings should not exceed more than 20 metres in height. We strongly object to this restriction as there is no Council evidence to support this restriction nor is the character of Blundell Street/Tileyard Road (and indeed, the wider LSIS) sensitive in townscape terms. Rather it is characterised by utilitarian developments which have been designed in response to occupational needs. Given the need to optimise development outputs in order to make efficient use of land, we consider that a blanket height restriction would result in an unsustainable use of resources which is simply not justified by the Council’s evidence base.

We also consider that the suggested view of the Market Place Clocktower from Randell’s Road to the south has no merit and should be removed from the draft Plan as it further unnecessarily restricts future redevelopment and intensification.

We **strongly object** to the presumption against the creation of new Class B1(a) accommodation as set out in draft Policy SP3 of the Local Plan ("Strategic and development management DPD").

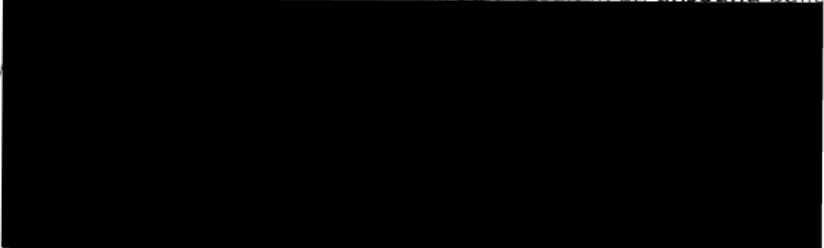
We **strongly object** to the arbitrary five storey building height limit as set out in draft Policy SP3 of the Local Plan ("Strategic and development management DPD").

We **strongly object** on the grounds of the council's insufficient evidence base to support their draft proposals.

We **strongly object** on the grounds that draft policy SP3 does not confirm with the NPPF or the draft London Plan

We consider draft policy SP3 to be **unjustified** and would result in an **unsound** policy.

Yours sincerely

A large black rectangular redaction box covers the signature area, obscuring the name of the person who signed the letter.

Tileyard Estates/Sands Catering