

Deepdale Investment Holdings Limited

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

18th October 2019

Dear Sir / Madam

**ISLINGTON DRAFT LOCAL PLAN REGULATION 19 CONSULTATION
REPRESENTATIONS FROM DEEPDALE INVESTMENT HOLDINGS LIMITED, RE 188 YORK WAY
IN RESPECT OF 'SITE ALLOCATIONS DPD' AND 'STRATEGIC AND DEVELOPMENT
MANAGEMENT POLICIES DPD' - SEPTEMBER 2019
TOWN AND COUNTRY PLANNING ACT AS AMENDED**

Site Allocation VR6

We write in response to the Council's consultation regarding its proposed Regulation 19 draft Local Plan published in September 2019. We are the owners of the building at 188 York Way, which is currently being developed, implementing planning permission ref P2017/2937/S73 for will provide a part 7/part 8/Part 9 storey building to provide office (use class B1a) and flexible (Use Class B1) floorspace. The development is expected to be completed in February 2020.

The site is allocated in your Site Allocations Document under allocation VR6. Please note that the building has been renamed 'Rolling Stock Yard' (RSY). Given that the permitted scheme has now been implemented we see little point in setting out development considerations for this site, save for opportunities for site assembly with adjacent sites, which could realise greater development opportunities.

RSY holds a unique position within the LSIS being the only previously existing office B1a building and the gateway entrance to the LSIS from the south. The proposed scheme will bring forward a high quality office development, which will support and complement the existing uses on the LSIS. On this basis, and given the unique nature of the location of this site, any further development, amendments or new planning applications should support the existing use as a B1a office, as any attempt to further intensify industrial uses could affect the viability

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and amenity of the implemented office scheme. Any further office proposals in association with the building should be supported in line with the current use of B1a as this will not have any significant detrimental impact on the remaining viability or vision for the LSIS.

The proposed scheme has not resulted in any loss of B1c, B2 or B8 space and the office use is considered complimentary to the wider area, therefore any future development should support the intensification of all B uses classes at this site, including B1a.

Wider LSIS

We also write to register our **objection** to the local planning authorities proposed wider draft Strategic and Development Management policies for the area.

We consider the draft policies will significantly damage and undermine the economic and employment potential of the area in general 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

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(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 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.

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** 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



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