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Planning Policy
Islington Council
Town Hall
Upper Street
London
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18 October 2019

By email to: planningpolicy@islington.gov.uk

Dear Sir/Madam

Islington Local Plan Proposed Submission (Regulation 19)

On behalf of our client, Grimaldi Holdings Limited, hgh Consulting is writing to object to the Proposed Submission version of the Islington Local Plan.

Our client has two main concerns with the draft Local Plan as set out below.

Office Development on Pentonville Road

The first concern relates to a lack of flexibility in the drafting of policy which could be to the overall detriment of the policy objectives and Spatial Strategies.

Spatial Strategy Policy SP2 of the Strategic Development Management Policies document sets out the key priorities and requirements for the King's Cross and Pentonville Road area. It looks to advance the development of a commercial corridor along Pentonville Road. Part C set out that *"A broad range of business floorspace typologies are suitable within the Spatial Strategy area, including Grade A offices, hybrid space, and co-working space."*

Aspirations to improve levels of employment in this sustainable location are strongly supported, and it is agreed that Pentonville Road represents an excellent opportunity to improve its commercial offer to the benefit of London as a whole.

Reference to a variety of suitable business space including hybrid space is welcomed. Modern businesses require diverse types of employment space and support services to fit their needs. Development that directly supports commercial use can be equally important in creating a thriving business environment and in turn drives employment.

We note the definition provided in the Glossary for hybrid space covers buildings that provide services which support the expanding central London economy, but the definition is very narrow and is restricted to industrial



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activities/occupiers only. There is a missed opportunity for not providing a more flexible definition of hybrid space that covers other business focused development that provides direct employment whilst also supporting the function of employment use without necessarily having a B use class.

Allowing for a wider range of types of uses similar to the definition of employment floorspace provided in paragraph 4.6 of the Strategic Development Management Policies would be more appropriate as it covers all floorspace that generates employment, including offices, industry, warehousing, retail, entertainment etc. This would encourage a truly flexible commercial area along Pentonville Road that would be able to thrive throughout the duration of the plan and respond appropriately to changes in the market.

Policy B1 and B3 compounds matters by explicitly requiring no net loss of business floorspace and Policy B2 states that proposals are required to maximise the amount of business floorspace. This is potentially contrary to the Council's aims in seeking *"...to cultivate a diverse and vibrant economic base through requiring development to provide a range of workspace types and unit sizes, which are affordable for a range of occupiers including established and emerging enterprises, and SMEs."* Equally, Policy B2 A(ii) encourages a wide variety of business floorspace typologies along Pentonville Road.

There should be greater flexibility to allow the loss of office floorspace through redevelopment, provided it is suitably replaced with alternative employment generating use that supports the function of Pentonville Road as a commercial corridor. The definition of employment floorspace could be used to fit this purpose.

Affordable Workspace Policy

Secondly, we are concerned with the requirement of Policy B4 to incorporate affordable floorspace that is leased to the Council at a peppercorn rate for a period of at least 20 years. This is significant divergence from the existing policy provided in Development Management Policies Document Policy DM 5.4 which requires an agreement to lease the workspace at a peppercorn rate for at least 10 years directly to a Council approved Workspace Provider.

Our main concern relates to the proposed requirement to lease the affordable space to the Council rather than directly to an approved provider. Having reviewed the Draft Local Plan Viability Study 2018, we have identified no suggestion that it would be appropriate for the Council to directly enter into leaseholds for any such affordable workspace. We invite the Inspector to review the Procurement Strategy and Grant of Under-Lease Agreements for Affordable Workspace Operators 2019-2023 as we are concerned that the approach is not the most appropriate strategy against reasonable alternatives; including approaches adopted by other boroughs.

We trust the above comments in this representation will be taken into account in the formation of the draft Local Plan; ensuring that it is positively prepared and appropriately justified.

Should you require anything further, please do not hesitate to contact me. Please keep me notified of the next steps of the Local Plan process.

Yours faithfully

A black rectangular box used to redact the signature of Alfie Yeatman.

Alfie Yeatman