

Power, Ciara

From: Danielle Smith <info@cma-planning.co.uk>
Sent: 18 October 2019 10:17
To: planningpolicy
Subject: Representations on behalf of Pause Living - Regulation 19 Local Plan
Attachments: Islington Reg 19 Draft Local Plan Representations Pause Oct 19.pdf

Follow Up Flag: Follow up
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Categories: REG 19 RESPONSE, Ben

Dear Sir / Madam

Please find enclosed representations on behalf of our client, Pause Living, in respect of the Council's current Draft Local Plan consultation.

We look forward to receiving confirmation that these representations have been duly received.

Yours sincerely
CMA Planning

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Spatial Planning and Transport
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(by email)

17th October 2019

Dear Sir / Madam

**ISLINGTON DRAFT LOCAL PLAN REGULATION 19 CONSULTATION – SEPTEMBER 2019
REPRESENTATIONS ON BEHALF OF PAUSE ‘STRATEGIC AND DEVELOPMENT MANAGEMENT POLICIES
DPD’**

We write on behalf of Pause Living ("Pause") in response to the local planning authority's draft Local Plan published for consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Pause is an experienced developer and operator of purpose-built shared housing (sometimes referred to as co-living), and they are concerned that the approach being taken by the local planning authority in its current draft Local Plan would prejudice the delivery of much needed homes, particularly in the private rented sector, in a manner that conflicts with the recently published draft London Plan which is at a more advanced stage in the plan-making process.

Purpose-built shared housing

The National Planning Policy Framework (NPPF) sets out the Government's objective of significantly boosting the supply of housing, and ensuring that the needs of groups with specific housing requirements are addressed (paragraph 59).

The Draft Replacement London Plan notes that, *'the lack of supply of the homes that Londoners need has played a significant role in London's housing crisis'* (paragraph 1.4.2). In response, it notes that the 2017 London Strategic Housing Market Assessment (SHMA) has identified a significant overall need for housing with an annual minimum target of 66,000 homes in order to meet forecast housing demand¹. To achieve this target, annual housing provision across Greater London must double from the level seen over the period 2011-2016², although a recent consultation paper by the Department for Communities and Local Government suggests that this figure is too low, with a revised target of 72,000 additional homes put forward per year³.

¹ GLA, 2017. The 2017 London Strategic Housing Market Assessment.

² GLA, 2016. The London Plan (March) 2016

³ DCLG, 2017. Planning for the Right Homes in the Right Places.



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At a local level, the draft Islington Local Plan identifies that the need for new housing in the borough is significant. The Islington SHMA identifies a borough-level housing need of 23,000 dwellings over the period 2015-2035, which translates into a housing target of 7,750 units by 2028 / 29 (an annualised target of 775 per annum).

As set out in the draft Local Plan, the borough faces a number of challenges in meeting this target, and it is acknowledged that 'conventional residential development' may represent the Council's preferred form of development in meeting local needs. However, purpose-built shared housing (which includes "co-living") has the potential to make a contribution towards meeting both Islington and London's wider housing needs as recognised by the Draft London Plan (Policy H18).

We are concerned that the approach taken in the draft Islington Local Plan would result in a policy which is not effective (and, as such, fails to meet the test of soundness), on the basis that: (i) it is not in general conformity with the Draft London Plan as required by the Act⁴; and (ii) it fails to facilitate the opportunities arising from innovative forms of housing such as co-living and the benefits it could offer the community.

We consider that a policy is needed that positively enables the assessment of applications for co-living (even if this makes it clear that conventional housing remains the preferred form of development, and that co-living will only be acceptable in specific circumstances), in order to address the test of soundness.

We trust these comments are useful and look forward to receiving confirmation that our representations have been received. We would also welcome the opportunity to discuss an alternative policy approach with the local planning authority to address our concerns.

Your sincerely

CMA Planning

CMA Planning Ltd

⁴ Planning and Compulsory Purchase Act 2004 24(1) (b)