



15th October 2018

Delivered by email

Planning Policy Team
Planning Policy
Islington Council
Town Hall
Upper Street
London
N1 2UD

Dear Sir / Madam,

SUBMISSION OF REPRESENTATIONS TO ISLINGTON'S LOCAL PLAN: STRATEGIC AND DEVELOPMENT MANAGEMENT POLICIES (SEPTEMBER 2019) AND THE BUNHILL AND CLERKENWELL AREA ACTION PLAN (SEPTEMBER 2019); REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

We write on behalf of our client, Picton Property Income Ltd, in relation to 50 Farringdon Road EC1M 3HE and Angel Gate, Goswell Road, EC1V 7NA.

We hereby formally submit these representations to the '*Islington Local Plan: Strategic and Development Management Policies*' document (September 2019) and the '*Bunhill and Clerkenwell Area Action Plan (AAP)*,' document, (September 2019).

The first section of our representations relates specifically to the relevant policies highlighted within the Local Plan '*Strategic and Development Management Policies*' document. The second section of our representations refers to the relevant policies within the '*Bunhill and Clerkenwell AAP*' document. The final part of our representations focusses upon the 'site allocations' section within the AAP, which refers to two 'Site Allocations' at 50 Farringdon Road and the Angel Gate site on Goswell Road, which are owned by our client.

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Picton

Picton Property Income Limited is an award winning UK Real Estate Investment Trust (REIT) which invests in commercial property across the United Kingdom. Established in 2005, Picton has a main market listing on the London Stock Exchange. Further details can be found at www.picton.co.uk

Response to Islington's Local Plan: Strategic and Development Management Policies, Sept 2019

The draft Local Plan: Strategic and Development Management Policies comprises the principal document in the Local Plan. It sets out strategic policies to identify where and how change will happen in Islington; and detailed policies to manage development.

Having reviewed the draft policies contained within document, we hereby make the following representations on behalf of our clients.

Policy B1: 'Delivering business floorspace'

Part 'B' of Policy B1: '*Delivering business floorspace*', seeks to focus new business floorspace within the '*CAZ (Central Activities Zone), Bunhill and Clerkenwell AAP area, CAZ fringe...*' etc. It goes on to state:

'Proposals in these areas must maximise the amount of new business floorspace; proposals which do not demonstrate maximisation will be considered to be an inefficient use of a site and will be refused.'

We confirm that we support the general aim to maximise the amount of new business floorspace in new developments in these areas. However, in some locations it may be necessary for new development proposals to include an element of residential use to support development viability. Furthermore, such an approach is also consistent with Policy 4.3 '*Mixed Use Development and Offices*', within the London Plan, which supports the provision of '*mixed-use*' development within the CAZ.

On this basis, we consider that Part 'B' of Policy B1 should be amended as follows (in red text):

'Proposals in these areas must maximise the amount of new business floorspace, alongside supporting residential use, where necessary, to enhance scheme viability and delivery; proposals which do not demonstrate maximisation will be considered to be an inefficient use of a site and will be refused.'

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Policy B2: 'New business floorspace'

Part 'A' of Policy B2: 'New business floorspace', seeks to prioritise business floorspace within the CAZ and Bunhill and Clerkenwell AAP, amongst other areas. The latter section of Part 'A' states:

'A... Proposals must maximise the provision of business floorspace in line with the priorities for each location. Proposals which are not considered to maximise business floorspace will not be permitted. Proposals involving existing business floorspace must prioritise the intensification, renewal and modernisation of this business floorspace throughout the borough and particularly in the locations set out below.'

Although we note that business floorspace is the priority use in this area, not all parts of the Bunhill and Clerkenwell AAP are established office locations and some fringe locations may require other supporting uses to make business-led development proposals both viable and deliverable. On this basis we consider that the last sentence of Part 'A' should be amended as follows:

'Although proposals should aim to prioritise business floorspace within these areas, supporting residential and other uses will be acceptable where they enhance scheme viability and delivery as part of a commercial-led mixed-use scheme. This approach will be supported throughout the borough and particularly in the locations set out below.'

In relation to this, Part 'A (i)' of Policy B2 specifically refers to the CAZ and Bunhill and Clerkenwell AAP area. Again, it highlights that the priority for the area is to deliver office use. However, at the end of the paragraph it states: 'Residential uses are not a key priority in this location'. Although we note the Council's desire to prioritise business floorspace in this area, we consider that new development proposals in some less established office locations could be assisted (in terms of viability and delivery) by supporting residential and other uses.

Therefore, we consider that the sentence 'Residential uses are not a key priority in this location', should be amended to state:

'Residential use will be supported as part of a commercial-led mixed-use scheme, where it supports scheme viability and assists in the delivery of mixed and balanced communities.'

We consider that the inclusion of a supporting element of residential use, as part of commercial-led mixed-use schemes in less established office locations, is consistent with Policy 4.3 'Mixed use development and offices' within the London Plan.

In addition, Part 'F (ii)' of Policy B2 states:

'F. All development proposals involving business floorspace (including affordable workspace provided in line with policy B4) must have regard to the following:

(ii) Provision of a good level of amenity for occupiers of the business floorspace, including adequate levels of daylight and sunlight; and access to communal/ancillary facilities including meeting rooms.'

We consider that the policy is overly restrictive and could result in innovative design solutions for new office development being refused planning permission. For example, there are many instances of office development within London which have made innovative and efficient use of vacant car parks or other basement floors which have little or no access to daylight or sunlight.

However, these spaces can be well planned and designed to provide additional employment floorspace. Such spaces can be well suited for meeting rooms and back of house functions or artificially lit office floors. Furthermore, new office development is generally not required to have adequate levels of daylight in terms of the relevant BRE guidance, unlike residential use.

Therefore, we consider that Part F (ii) of Policy B2 should be deleted as it is overly restrictive and could frustrate some office development coming forward.

Policy B4: 'Affordable workspace'

Part 'A' of Policy B4: 'Affordable workspace', states:

'A. Within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road), PELs and Town Centres, major development proposals involving 1,000 sqm or more gross B1(a) and/or B1(b) and/or general B1-use and/or a Sui Generis use akin to B1(a)/B1(b) floorspace must incorporate at least 10% affordable workspace (as a proportion of proposed B1(a) and/or B1(b) and/or general B1-use and/or a Sui Generis use akin to B1(a)/B1(b) floorspace B1(a) and/or B1(b) and/or general B1 and/or a Sui Generis use akin to B1(a)/B1(b) floorspace GIA) to be leased to the Council at a peppercorn rate for a period of at least 20 years. The Council will subsequently lease the space to a Council-approved operator.'

Policy B4 seeks to introduce a 10% affordable workspace requirement on major commercial schemes (1,000 sq. m+ of general B1-use and Sui Generis use akin to B1(a)/B1(b) floorspace (etc.)). Whilst we acknowledge there may be a need for the provision of some affordable workspace within Islington, we consider that this need must be balanced against overall scheme viability and other competing demands on development projects.

This includes the LB Islington Community Infrastructure Levy (CIL) which is currently £80 per sq. m for new B1a office space in the south of the borough. In addition, this also includes the GLA Mayoral CIL, which increased from £50 per sq. m to £80 per sq. m as of 1st April 2019.

Furthermore, many schemes also need to provide significant S.106 financial contributions (e.g. carbon off-setting etc). Additionally, if a mixed-use development, which includes residential, were proposed it would also attract the need to provide a contribution towards affordable housing.

It is clear that the 'Draft Local Plan: Strategic and Development Management Policies' document (September 2019) aims to promote a significant increase in office and general employment floorspace over the next plan period.

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However, the ambitious employment growth targets set out within this draft Local Plan could be jeopardised if too many financial burdens are placed on commercial development proposals. The additional burden of affordable workspace could make commercial proposals less viable (or unviable) and might therefore reduce the number of sites coming forward for new employment development.

Whilst there may be a case for some form of affordable workspace (or a financial contribution towards it) on some very large schemes (e.g. 10,000 sq. m+) we do not consider that it is appropriate to apply this to any scheme of 1,000 sq. m+, which at the lower size threshold is still relatively small.

On this basis, we consider that the requirement for affordable workspace should be removed to encourage commercial redevelopment schemes to come forward and enhance their viability.

Policy DH2: Heritage assets'

Part 'J' of Policy DH2 refers to 'views' and notes that there are a number of strategic views, local views and views of landmarks in Islington. It notes that these give important views of St Paul's Cathedral. It states (in part) as follows:

'All views – strategic, local and local landmarks – must be protected and enhanced. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. Development proposals must provide appropriate supporting material – including 3D modelling - to verify the visual impact of proposed development on protected views.'

We consider that there is ample opportunity to enhance such views, whilst also providing new development opportunities (see detailed representations in relation to 50 Farringdon Road). We consider that such proposals should be entertained if applicants can demonstrate that there is a qualitative and quantitative enhancement to such views. We consider that the current policy approach is overly restrictive, inflexible and draconian. We consider that the text noted above should be amended as follows:

'Proposals involving the redevelopment of buildings that currently adversely impact a protected view will be encouraged to take all reasonable steps to enhance the view as and when new proposals come forward. Development proposals within such views will be supported in principle if the applicants can demonstrate overall qualitative and quantitative enhancements to these views, including measures such as publicly accessible rooftop viewing platforms and new public space.'

Policy DH3: 'Building heights'

Parts 'A' and 'B' of Policy DH3 'Building Heights', are relevant and state as follows:

'A. Buildings of more than 30 metres, or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser) will be considered to be tall buildings.'

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B. Buildings of more than 30 metres are only acceptable in-principle: (i) on sites allocated in the Local Plan where the allocation makes specific reference to suitability for heights of 30 metres or more; and/or (ii) within specific sites identified in a Spatial Strategy area.'

We consider that this 'blanket' restriction on potential building heights (30 metres and above and / or twice the height of the surrounding context) is too restrictive and may not be able to adequately respond to all eventualities. This could also result in future development proposals failing to optimise the development potential of sites, which would be in conflict with Section 11 'Making effective use of land', within the National Planning Policy Framework (February 2019).

It should also be noted that a height restriction of 30-metres would only result in approx. 6-7 storey building heights for a commercial development (e.g. assuming a 4-metre or above floor to floor height). We consider that building heights of 6 or 7 storeys in many parts of the southern part of Islington are actually relatively conservative and new developments of 7-storeys and above are now commonplace in central London locations, such as southern Islington.

Furthermore, the policy appears to pay little regard to 'design quality'. We consider that a high-quality design is a significant factor when considering the acceptability of tall or taller building proposal. On this basis we do not consider that planning policies should seek to restrict the effective use of land, especially within a central borough such as Islington which lies within a 'World City', such as London.

In summary, we consider that the draft wording within Parts 'A' and 'B' of Policy DH3 should be amended to provide sufficient flexibility to allow high-quality tall building proposals to come forward where justified. Specifically, the reference to a 30 metre height restriction should be removed from the draft Policy.

Response to Islington's Local Plan: Bunhill and Clerkenwell AAP, September 2019

The draft Bunhill and Clerkenwell AAP is a Development Plan Document which forms part of Islington's Local Plan. The majority of planning policies are set out in the Local Plan: 'Strategic and Development Management Policies' Document. However, the AAP provides further planning policy guidance for the Bunhill and Clerkenwell area. It also contains the 'Site Allocations' within this area.

Paragraph 1.29 refers to 'Employment' and states:

'Islington is a major centre of employment; figures with 226,200 jobs based in the borough. Approximately 70% of jobs in the borough are based in Bunhill and Clerkenwell, which would equate to approximately 160,000 jobs; this is despite the area covering only 11% of the borough in terms of area and containing only 13% of the population. Employment growth in Islington has been rapid in recent years, with almost 30,000 jobs added between 2005 and 2015.'

Paragraph 1.43-1.44 also refers to The Elizabeth Line (formerly 'Crossrail'). It notes that The Elizabeth Line will make Farringdon one of the biggest transport interchanges in Britain with 140 trains per-hour, with the potential to handle over 100,000 passengers per day (on average) by 2026.

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Farringdon will be the only station from which passengers will be able to access The Elizabeth Line, Thameslink, and the London Underground.

Paragraph 1.52 – 1.54 refers to a ‘*Shortage of developable land*’. Paragraph 1.53 is most relevant and states (in part):

‘Islington has a strong economy, and employment projections suggest that, by 2036, 50,500 additional jobs will be created in the borough, with the majority of this increase within sectors that will require office accommodation. Seventy percent of the borough’s employment is concentrated in the AAP area.’

Our clients’ own two major commercial office buildings within the Bunhill and Clerkenwell AAP and both sites are identified within the Site Allocations section. The sites are ‘50 Farringdon Road’, (Site Allocation ref: BC20) and ‘Angel Gate, Goswell Road’, (Site Allocation ref: BC28). On this basis, our clients are wholly supportive of the Council’s ambition to focus regeneration and development within the Bunhill and Clerkenwell area.

Area Wide Policies: Policy BC1 ‘Prioritising office use’

Part ‘A’ of Policy BC1: ‘*Prioritising office use*’, states as follows:

‘A. Due to the significant evidenced need to provide office floorspace to cater for projected jobs increases and secure inclusive economic growth, office floorspace is the clear priority use across the entire Bunhill and Clerkenwell AAP area.’

Whilst we note the anticipated demand for new office floorspace over the plan period, we consider that Part ‘A’ should be amended as follows to provide flexibility and assist the delivery of potential development sites that may not be located in core commercial centres within the AAP. We consider that Part ‘A’ should be amended as follows (in red text):

‘Due to the significant evidenced need to provide office floorspace to cater for projected jobs increases and secure inclusive economic growth, office floorspace is the clear priority use across the entire Bunhill and Clerkenwell AAP area. However, supporting residential and other uses will be acceptable where they enhance scheme viability and delivery as part of a commercial-led mixed-use scheme.’

Part ‘B’ of Policy BC1 states (in part), ‘*All development proposals providing 500 sqm or more net increase in floorspace (within any use class) must comprise at least*’:

‘(ii) 80% office floorspace (as a proportion of the total net additional floorspace proposed) in any other part of the Bunhill and Clerkenwell AAP area.’

The draft policy states that a 500 sq. m increase within ‘any use class’ must deliver a majority proportion of office floorspace. We consider that this requirement would be unreasonable for other commercial uses (e.g. retail) and might act as a deterrent for sites coming forward for new

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employment or leisure (e.g. a gym or restaurant) development. On this basis, we consider that this requirement should relate to proposals for new office-led development only.

We also consider that the 80% office floorspace requirement is relatively high and that the policy should be amended to be flexible enough to respond to a variety of development scenarios, notably to include an increased residential content in development proposals.

We consider that such an approach is also consistent with Policy 4.3 of the London Plan and Part 'A' of Policy E1 'Offices', within the DLP, which promote mixed-use development ('Draft London Plan - consolidated changes version July 2019'). On this basis, we consider that Part 'B' should be amended as follows (in red text):

*'All **mixed-use** development proposals providing 500 sq. m or more net increase in **B1a office floorspace** should seek to comprise at least:*

*'(ii) **50%** office floorspace (as a proportion of the total gross floorspace proposed) in any other part of the Bunhill and Clerkenwell AAP area.'*

Furthermore, Part 'C' is relevant and relates to our points set out in Part 'B'. Part 'C' states:

'Development proposals under the threshold set out in Part B must be office-led, meaning that the majority of floorspace (as a proportion of the total net additional floorspace proposed) must be office floorspace.'

We consider that Part 'C' should be amended as follows (in red text):

*'**B1(a) office** development proposals under the threshold set out in Part B should prioritise **non-residential uses**, meaning that the majority of floorspace (as a proportion of the total gross floorspace proposed) should be office floorspace.'*

We consider that this approach is more explicit and flexible as it makes specific reference to B1a office development only. For example, small-scale development by non-commercial office developers (e.g. a retail unit) should not be required to adhere to this policy requirement (as currently drafted) and we consider that this would be an unreasonable requirement.

Part 'D' of Policy BC1 sets out a number of 'exceptions' to Parts 'B' and 'C' and we can confirm that we are generally supportive of this approach. However, we consider that Part 'D' (iv) should be amended to read as follows (in red text):

*'(iv) development is proposed in **predominately** residential parts of the AAP area, such as housing estates and **semi-residential areas**.'*

Area Wide Policies: Policy BC2 'Culture, retail and leisure uses'

Having reviewed Policy BC2: 'Culture, retail and leisure uses', we can confirm that our clients are generally supportive of the aims of this policy. We note that Farringdon (to the south and east of the Station) is designated as one of the four local shopping areas within the AAP area. We also note that No.50 Farringdon (Site Allocation BC20) is located within the 'Clerkenwell/Farringdon Cultural Quarter', area as shown at Figure 2.2.

Policy BC4 'City Road'

Part 'A' of Policy BC4: 'City Road', seeks to create a significant commercial corridor at this location to meet its full growth potential in terms of business floorspace and job projections. Part 'B' is particularly relevant as the 'Angel Gate' office complex on the Goswell Road (Site Allocation BC28) is located within this area. Part 'B' states:

'Proposals for the redevelopment/intensification of sites with existing business floorspace must look to increase business floorspace provision as far as possible, in line with the Council's priority for the City Road commercial corridor.'

Whilst we are generally supportive of the aim to optimise employment floorspace provision in redevelopment proposals, it should be noted that many parts of the 'City Road' area (and its surrounds) are less established commercial office locations compared to other parts of the AAP, such as Farringdon. On this basis, we consider that Part 'B' should be amended as follows (in red text):

'Proposals for the redevelopment/intensification of sites with existing business floorspace should look to increase business floorspace provision as part of major mixed-use schemes, in line with the mixed-use policies set out within the London Plan. Residential use will be supported, especially where its inclusion enhances scheme viability and delivery as part of a commercial-led mixed-use scheme.'

We consider that the suggested amendments to Part 'B' would respond to concerns relating to sites outside of established or 'core' commercial office locations. Such an approach would also assist with overall scheme viability and deliverability. Furthermore, it also provides the opportunity to optimise both housing and affordable housing delivery alongside replacement (or enhancement) office use, therefore resulting in additional planning benefits.

Part 'D' refers to the typology of different office functions within the City Road area. It states (in part) that, 'The northern part of City Road, north of the City Road Basin up to the AAP boundary near to the Goswell Road/City Road junction, is considered a more suitable location for smaller offices.'

Whilst the Council may consider the 'Goswell Road / City Road junction' to be more suitable for smaller offices, we would not wish for this policy to restrict the ability of our client to promote large Grade A office floorplates as part of any potential redevelopment of Angel Gate, should they wish to do so.

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Policy BC5 'Farringdon'

Part 'C' of Policy BC5: 'Farringdon', is relevant as our client owns No.50 Farringdon Road, which is listed as Site Allocation (BC20). It states:

'On sites adjacent to and above Farringdon station, development proposals must be predominantly offices and associated business uses.'

The aim to promote predominantly office and business uses around Farringdon is logical given the highly accessible nature of the area. However, we would like to clarify that a predominantly office redevelopment at this location could also include an element of residential use, if desired by the applicant.

Part 'H' of BC5 is relevant in relation to No.50 Farringdon Road. It states:

'The railway cuttings should be retained as predominantly open spaces. Enhancements to the cuttings that conserve and enhance their heritage value, and provide improved pedestrian access across the space between Turnmill Street and Farringdon Road, are encouraged. The disused underground railway line between Farringdon and Barbican will be safeguarded to allow for its future reuse for transport purposes.'

In addition, paragraph 3.34 forms part of the supporting text to Policy BC5 and states:

'The Spatial Strategy area covered by Policy BC5 (shown on Figure 3.4) consists of two large impermeable city blocks dominated by large scale infrastructure and located within a wider area of significant historic character. The Council's objectives for the area include enhancing design quality, pedestrian circulation, interchange, legibility and permeability.'

We consider that Part 'H' should be amended as detailed below (in red text) to provide the long-term opportunity to bridge over the existing railway cutting to provide a vibrant public square with rear access into Farringdon Station alongside enabling commercial development. This proposal has been discussed with LB Islington over the past 6-years via the formal pre-application process.

We consider that the proposal would adhere with the general aims of Part 'H' and paragraph 3.34 which seeks to significantly enhance design quality, pedestrian circulation, legibility and permeability etc. The potential to explore bridging over the railway cutting at this location is also supported at Policy 2.13 within the London Plan, which is detailed below.

We suggest Part 'H' should be amended as follows:

'The railway cuttings should be retained as predominantly open and publicly accessible spaces. Enhancements to the cuttings that conserve and enhance their heritage value, and provide improved pedestrian access across the space between Turnmill Street and Farringdon Road, as well as to the rear of Farringdon Station are encouraged. It is accepted that the costs of this public open space 'deck' will need to be supported by enabling commercial development on the eastern part of the deck above the railway line. Any proposal will need to demonstrate that it results in enhancements to LV1. The disused underground railway line between

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Farringdon and Barbican will be safeguarded to allow for its future reuse for transport purposes.'

The detailed background to the public open space 'deck' and a summary of our clients' vision is set out below.

A New Public Open Space for Farringdon

No.50 Farringdon is located within the Central Activities Zone (CAZ) as well as the 'Farringdon / Smithfield' Intensification Area (AI) as identified within Table A1.2 within The London Plan, March 2016. It states that the area has an indicative employment capacity of 2,500 additional jobs and additional capacity for a minimum of 850 new homes. The AI text states (in part):

'This is an Area with potential for intensification on a number of sites and broader improvements to the public realm and mix of uses. These will be supported by Crossrail and the Thameslink programme at Farringdon. The scale of additional development capacity is dependent on operational rail requirements, the degree of station renewal and improvements to transport and interchange capacity. The potential for bridging over the railway cutting to expand development capacity and public space provision should be explored.'

Part 'Aa' of Policy 2.13 'Opportunity Areas and Intensification Areas', within the London Plan is relevant in this instance and states:

- 'A *Within the opportunity and intensification areas shown in Map 2.4, the Mayor will:*
- a *provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward.'*

In accordance with Policy 2.13, we consider that the production of a detailed masterplan for Farringdon would be beneficial to assist with the delivery of additional commercial development and public realm improvements above the railway cutting.

Additionally, it should also be noted that office development is encouraged and prioritised in Policies SD5 'Offices, other strategic functions and residential development in the CAZ' and E1 'Offices', within the DLP.

The DLP also identifies a significant increase in projected office and employment floorspace demand from 2016-2041 at Table 6.1 and identifies office jobs growth of 619,300 employees (up from 303,000 in the current London Plan) during this time. Approximately 59% of this growth is expected to be accommodated within the CAZ and Northern Isle of Dogs.

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It should be noted that the DLP is now at an advanced stage and the Examination in Public (EiP) of the Plan ended in May 2019. Although it does not yet form part of the Development Plan, it is considered a material consideration in planning decisions.

In summary, we consider that the AI designation within the London Plan identifies an ambitious plan for redevelopment for Farringdon which aligns with the enhanced accessibility, importance and development capacity for the area. The AI designation (in part) recognises the potential to bridge over the railway cutting and states:

'The potential for bridging over the railway cutting to expand development capacity and public space provision should be explored.'

Following on from this commentary, our clients' have sought to promote 50 Farringdon Road for comprehensive redevelopment over the past decade in accordance with the guidance above. During this time they have promoted a 'design vision', via the formal pre-application process with LB Islington, which is detailed below.

The Vision

With the arrival of the Elizabeth Line (Crossrail) at Farringdon between October 2020 and March 2021 (approx.), the area will become one of the busiest and most accessible stations in the UK. On this basis, it is logical to focus new office-led mixed-use development in and around Farringdon and we consider that the opportunity to maximise the delivery of new development alongside public realm enhancements should be maximised.

Our clients have sought to promote the comprehensive redevelopment of 50 Farringdon Road as part of a wider masterplan for the area over the past decade. This has involved consultation with the Greater London Authority (GLA) and LB Islington via the pre-application process as well as the submission of formal representations to draft Local Plan documents to promote the site and vision.

The proposal follows the guidance outlined within the London Plan and seeks to bridge over the railway cutting to the east of the site to both expand development capacity and increase public space provision.

The most recent version of the proposal sought to provide a major office scheme, which developed the site in conjunction with the railway cutting to the east, which would be 'decked-over' to create a development platform. The office building proposed totalled approx. 300,000 sq. ft (approx. 6-7 storeys high) and this would be located to the east of the existing site, to the north of Farringdon Station.

The existing building would be removed as this is a local eyesore and has no architectural merit. This would then enable the provision of a new public square above the railway, which would have direct access to the rear of Farringdon Station. This in turn would enhance pedestrian access flows and allow commuters to access the area to the north of Farringdon Station more quickly.

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However, we note that the existing building as well as the proposed location of the new building above the decked development platform lie within Local View 1 (LV1) which is a local viewing plane from the north of the site to St. Paul's Cathedral, which lies to the south.

LV1 comprises a viewing plane, rather than a viewing corridor. Therefore, if this constraint is applied stringently the potential to deck over the railway cutting to provide new development and new areas of public open space (which would need to be funded by the new office development) will not materialise.

In response to this constraint, we proposed that the roof of the new office building would include a publicly accessible roof terrace so that members of the public could enjoy enhanced views of St. Paul's Cathedral and central London. This would be in addition to new views created by the new public square.

As part of this exercise we also undertook additional work in conjunction with Hayes Davidson (a firm that specialises in the visualisation of proposed developments) and provided an assessment of the LV1 viewing plane. In summary, this work assessed the impact of the proposed development (new building of 6-7 storeys above a decked development platform and removal of 50 Farringdon Road) against the current situation.

This quantitative assessment demonstrated that the proposal would increase the visibility of St. Paul's Cathedral from within the viewing plane (and to the south of the viewing plane) and would also provide additional benefits, such as a new public square providing access to Farringdon Station; additional office space and jobs; a publicly accessible roof terrace and the removal of a local eyesore, namely 50 Farringdon Road. The results of this assessment are shown at Figure 1.1. below.

In relation to Figure 1.1. the image of the left is the existing situation and the image on the right is the proposed situation (development above deck with removal of 50 Farringdon Road). The brown areas show where St. Paul's Cathedral is visible from. It should be noted that the marked improvement on the proposed situation is due to the new 'development platform' over the railway, which would be used as a public square. Furthermore, the new roof terrace on the proposed office building and the removal of 50 Farringdon Road (existing building), would further enhance views to St. Paul's Cathedral within LV1.

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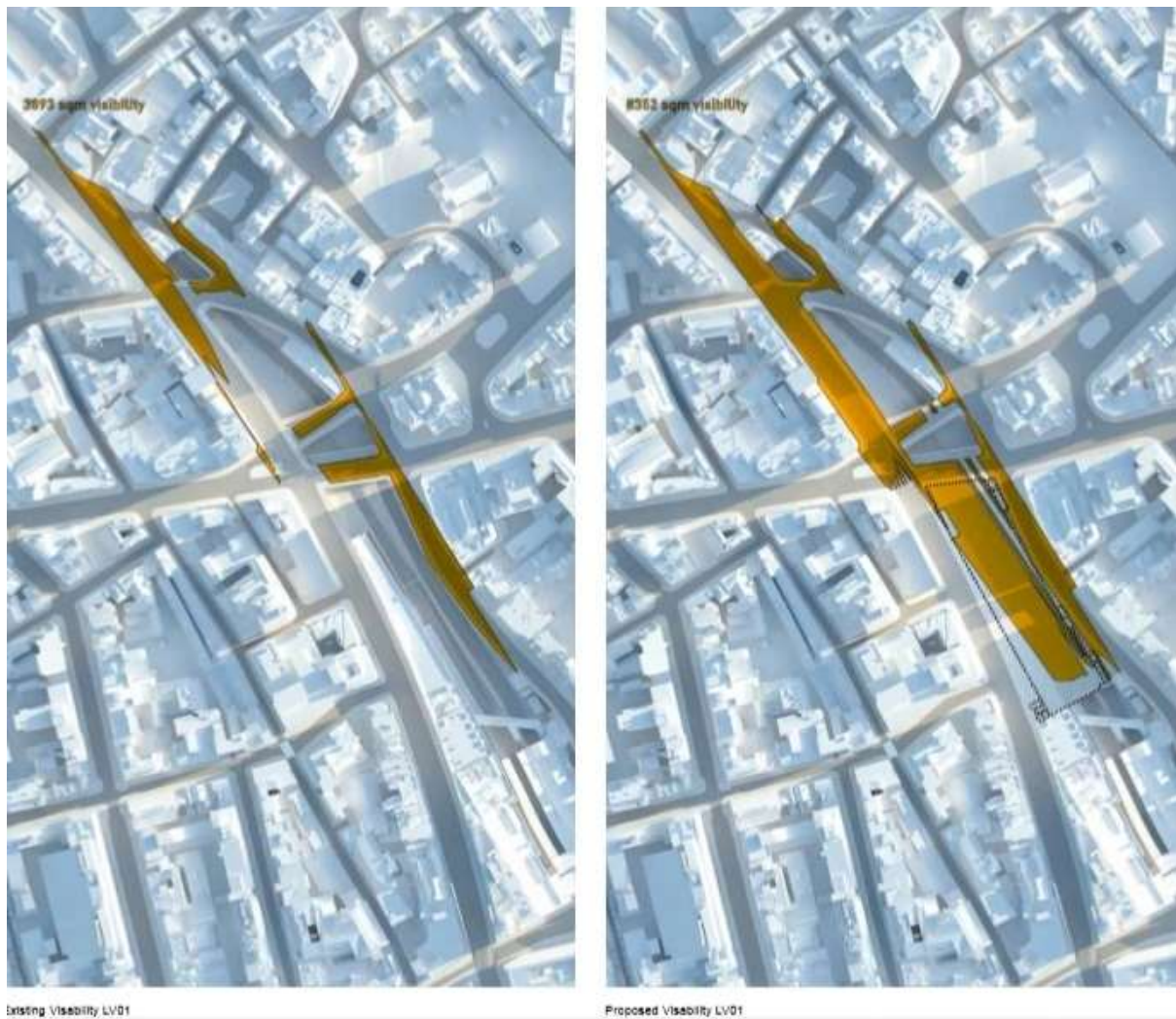


Figure 1.1: LV1 Viewing Plane and adjacent sites where St. Paul's Cathedral is visible (existing and proposed situation)

The analysis and information provided at the pre-application stage was both detailed and extensive. Therefore, in the interest of brevity, we have not repeated it here. However, for the purposes of these representations we are simply seeking to amend the draft Site Allocation (BC20) to recognise the significant development potential and clear benefits of developing 50 Farringdon Road and bridging over the adjacent railway cutting to provide a new development platform; enabling commercial development and a new public square.

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Site Allocations

As noted previously, our client owns two major commercial office buildings within the Bunhill and Clerkenwell AAP Area and both are already identified as 'site allocations' for potential redevelopment within the 'site allocations' section of the Bunhill and Clerkenwell AAP.

This section of our representations provides a summary of the two site allocations, namely '50 Farringdon Road' (Site Allocation ref: BC20) and 'Angel Gate' (Site Allocation ref: BC28). We trust that these allocations will be updated and included within the new version of the Plan. A Site Plan of 50 Farringdon Road is provided at Appendix 1.

50 Farringdon Road (Site Allocation ref: BC20)

Although, 50 Farringdon Road is already identified within the Bunhill and Clerkenwell AAP (ref: BC20) we consider that the wording associated with the allocation should be updated as detailed below.

Suggested Revised Site Allocation text:

"BC20: 50 Farringdon Road

Address: 50 Farringdon Road, EC1M 3NH

Ownership: Network Rail Infrastructure Limited (freeholder) and Picton Property Nominee (No.3) Limited and Picton Property Nominee (No.4) Limited (long leaseholder)

Approximate size of site: 1,568 sq. m

Current/previous use: Offices (B1)

How the site was identified and relevant planning history: 2013 Site Allocation (BC39)

Allocation and Justification: Intensification of business use with improved pedestrian connections to Turnmill Street and Farringdon Station. Provision of a new public open space 'deck' above the railway to the rear of Farringdon Station will be supported in principle alongside enabling commercial development on the eastern side of the 'deck'. New proposals will need to demonstrate an enhancement to LV1 and highlight various benefits of the redevelopment proposal.

These changes to LV1 will be considered in light of improvements to the public realm, overall accessibility to Farringdon Station and jobs created through additional commercial development. New proposals will be required to preserve the character and appearance of nearby conservation areas, whilst noting the need for additional growth at this important public transport hub. The site falls within protected viewing corridors defined by the London View Management Framework and new proposals should not breach this viewing plane.

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Site designations and constraints:

- *Central Activities Zone (CAZ);*
- *Farringdon Spatial Strategy area (policy BC5);*
- *Protected viewing corridors defined by the London View Management Framework;*
- *Clerkenwell Archaeological Priority Area;*
- *Close to the Charterhouse Square, Clerkenwell Green and Hatton Garden Conservation Areas;*
- *There are also a number of 'Historic Clerkenwell' heritage assets, as designated through Policy BC8, in close proximity to the site. The site is partially within, and adjacent to, a Local Flood Risk Zone and is at risk of significant/extreme flooding.*

Development considerations:

- *Improvements to the existing building should aim to improve its visual relationship with the Fleet Valley buildings.*
- *Proposals should pursue a ground floor that integrates with the adjacent public realm and integrated transport interchange, relates to the neighbouring development site to the south (BC19).*
- *There may be potential for reconfiguration and/or refurbishment.*
- *Comprehensive proposals to create a new public open space 'deck' to the rear of Farringdon station alongside enabling development on the eastern side will be supported in principle.*

Estimated timescale: 2025/26 - 2029/30'."

For the reasons contained within these representations, we consider that the site allocation should be updated in accordance with the revised text noted above. We consider that this approach will promote the comprehensive development of the site and result in multiple public benefits.

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Angel Gate, Goswell Road (Site Allocation ref: BC28)

The Angel Gate office complex is currently identified as Site Allocation ref: BC48 within the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell) which was adopted in June 2013. It comprises an inefficient office complex which dates from the 1980's and represents a clear opportunity for significant redevelopment. It is identified as Site Allocation BC28 within the Draft Bunhill and Clerkenwell AAP (September 2019). A Site Plan of Angel Gate is provided at Appendix 2.

Apart from the buildings that front onto City Road, it is considered that all the remaining properties at the site can be demolished as they have no architectural merit. This will provide the opportunity to significantly increase the quantum of development at the site.

It should also be noted that the site lies within the CAZ and an '*Employment Priority Area (General)*'. On this basis, Policy 4.3 '*Mixed-Use Development and Offices*', within the London Plan is relevant and Part 'Aa' specifically requires increases in office floorspace to provide a mix of uses including housing for sites within the CAZ.

In addition, we would like to highlight that the National Children's Bureau (NCB) site, which lies immediately to the west of the Site Allocation boundary for Angel Gate, obtained planning permission (ref: P2014/3572/FUL) on 12th April 2016 for the following development:

'Demolition of existing buildings and erection of buildings of 1 to 5 storeys (plus lower ground floor level) to provide 26 residential units and office accommodation with associated refuse and cycle storage.'

An image of the proposal is provided at Figure 1.2. This also shows part of the Angel Gate Office Complex in the background.



Figure 1.2: Proposed Street Elevation Granted Planning Permission at the NCB site

The proposal provided a residential-led mixed-use scheme at the site and paragraph 10.14 within the Planning Committee Report refers to the proposed residential use and is relevant in this instance. It states:

'10.14 Policy CS12 of the Islington Core Strategy 2011 encourages the provision of new housing of good quality to meet identified and pressing housing needs, particularly affordability and inclusivity needs. With regard to the provision of residential accommodation as part of the proposed development (as required by London Plan policy 4.3 and Finsbury Local Plan policy BC8 (part D)), proposals that would result in a net increase in office floorspace should provide at least 20% of the total net increase in office floorspace as housing.'

As noted in paragraph 10.14 above, Part 'D' of Policy BC8 'Achieving a balanced mix of uses', within the Finsbury Local Plan states:

'D. Throughout the area, major development proposals that would result in an increase in office floorspace should also incorporate housing, consistent with London Plan Policy 4.3. Where housing comprises less than 20% of the total net increase in office floorspace, and equivalent contribution will be sought for the provision of housing off-site.'

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As demonstrated by planning permission ref: P2014/3572/FUL the local area is equally suitable for residential or office uses, or both as part of a mixed-use scheme. We see no reason why housing would comprise less than 20% of the total net increase in office floorspace in any redevelopment proposal at the Angel Gate Office Complex and consider that the site has capacity for a significant number of additional jobs and dwellings.

Such an approach will also assist Islington Council achieve its housing target of 1,264 dwellings per annum, as detailed at Table 3.1 'Annual average housing supply monitoring targets 2015-2025', within the London Plan.

In addition, the 'Report on the Examination into The Finsbury Local Plan', by Sue Turner, an Inspector appointed by the Secretary of State for Communities and Local Government (dated 30th April 2013) advocated amendments to the current Site Allocation for Angel Gate to allow additional residential use to increase viability and delivery. Specifically, paragraph 22 of the Inspector's Report states:

'Promoting new office space – viability implications

22. The allocations at 96-100 Clerkenwell Road (BC41) and Angel Gate, Goswell Road (BC48) require redevelopment to be commercial or office led. However, the findings of the CPVS, which was completed during the examination, indicate that a more flexible approach should be taken to the range and mix of uses proposed on these sites to ensure that they can be delivered. To provide this flexibility the Council has proposed change MMF12, to allow a broader range of employment uses in site allocation BC41 and change MMF13, to allow a more flexible balance of employment uses in site allocation BC48.'

NB: CPVS = 'Combined Policy Viability Study'

In relation to this point, the proposed change at MMF13 to Site Allocation BC48 (Angel Gate) within the existing version of the Finsbury Local Plan was amended as shown at Figure 1.3 below.

Amend text as follows: "Redevelopment of the site to provide predominantly office uses ~~for a mix of uses, including units for small businesses. A small element of other employment generating uses/residential uses may also be acceptable~~ **Reprovision of the existing quantum of business floorspace is required as part of an overall increase in employment floorspace, alongside residential uses.**"

Figure 1.3: Amendments to Site Allocation BC48 (Angel Gate): Source 'Report on the Examination into the Finsbury Local Plan', 30th April 2013.

As noted above, we can confirm that the revised wording detailed above was included within the 'Allocation and justification' section of the current Site Allocation for Angel Gate (ref: BC48) within the Finsbury Local Plan.

The site has significant development potential for additional office and residential use as part of a comprehensive mixed-use scheme. Additionally, the Planning Inspector's '*Report on the Examination into The Finsbury Local Plan*', (dated 30th April 2013) noted the need for residential use at the site to increase the viability and deliverability of any future development proposal.

We also consider that the permitted (April 2016) scheme at the NCB site, which lies to the west of Angel Gate, demonstrates that the site and its immediate vicinity is suitable for a high quality mixed-use office and residential proposal.

On this basis, we request that the draft Site Allocation (BC28) for Angel Gate, Goswell Road, should be amended as follows to optimise the development potential of the site and increase overall scheme viability and deliverability:

Although Angel Gate is already identified within the Bunhill and Clerkenwell AAP (ref: BC28) we consider that the wording associated with the allocation should be updated as detailed below:

Suggested Revised Site Allocation text:

"BC28: Angel Gate, Goswell Road

Address: Angel Gate, Goswell Road, EC1V 2PT

Ownership: Picton Property Nominee (No.3) Ltd and Picton Property Nominee (No.4) Ltd and Picton Property No.3 Ltd.

Approximate size of site: 6,904 sq. m

Current/previous use: Offices (B1)

How the site was identified and relevant planning history: 2013 Site Allocation (BC48)

Allocation and Justification: *Redevelopment of the site to provide office-led development with a significant intensification of office floorspace alongside active frontages for commercial uses fronting Goswell Road. Residential use as part of a mixed-use scheme will also be supported to promote viability and deliverability in accordance with Policy 4.3 within the London Plan.*

Site designations and constraints:

- Central Activities Zone (CAZ);
- City Road Spatial Strategy area (Policy BC4);
- The site is partially within and adjacent to the Duncan Terrace / Colebrooke Row Conservation Area;
- It is also close to the New River Conservation Area;
- There are Grade II listed buildings within the site boundary at 320 to 326 City Road, and a locally listed building close to the site at 14 Wakley Street.

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Development considerations:

- *The buildings to the north of the site along City Road are within the Duncan Terrace / Colebrooke Row Conservation Area, with 320-324 City Road (City Gate) being a Grade II listed building. These buildings will not form part of the redevelopment.*
- *The principle of the comprehensive redevelopment of the remainder of the site to provide a major commercial office and residential mixed-use scheme is supported in principle.*

Estimated timescale: 2025/26 - 2029/30."

For the reasons contained within these representations, we consider that the text associated with the site allocation should be updated as detailed above to promote the comprehensive development of the area.

Conclusion

We trust that these representations will be fully considered in relation to the site allocations at 50 Farringdon Road (BC20) and Angel Gate, Goswell Road (BC28) in addition to our general policy comments.

We also hope that the council will consider the many benefits that could be created by adopting a pragmatic approach to the land to the north of Farringdon Station and by providing revisions to Policy BC5 'Farringdon' and Site Allocation BC20.

We consider that it would be beneficial for our project team to meet with Planning Policy Officers to highlight the benefits of our approach in relation to 50 Farringdon Road and the surrounding railway cuttings and I would be grateful if you could contact me to arrange this.

We consider that these ambitious proposals have the potential to accommodate significant growth at a key transport-hub within the central area of Islington, whilst providing significant public realm benefits for the Farringdon station area. If you have any queries on these representations, please do not hesitate to contact me at these offices on 020 3668 6986 (mob: 07957442158).

Yours Faithfully,



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