



DJM/LT/KFW/DP5346

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Planning Policy
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Dear Sir/Madam,

STRATEGIC AND DEVELOPMENT MANAGEMENT POLICIES AND SITE ALLOCATIONS, REGULATION 19 CONSULTATION, OCTOBER 2019

On behalf of our Client, Regent's Wharf Unit Trust, we write in respect of the Regulation 19 consultation on the draft Strategic and Development Management Policies and Site Allocations Plan (SDMPSAP) 2019. These representations follow our previous submissions to the London Borough of Islington's (LBI) consultation on the emerging SDMPSAP including the Regulation 18 consultation held in January 2019.

Our client are the owners of the Site known as 10 – 18 All Saints Street (also known as Regent's Wharf) which is identified as a new Site Allocation in the SDMPSAP (Ref: KC3). At the time of writing, proposals are currently being developed to deliver a mixed-use redevelopment comprising of office (Use Class B1) and retail (Use Class A1/A3) at this Site, the details of which are due to be submitted to LBI imminently. These representation have been made within this context and previous representations on the draft SDMPSAP.

Site Allocation (Ref: KC3)

As set out in our previous representations to the Regulation 18 Consultation, whilst we welcome the allocation of the Site in principle, we consider that the wording of the allocation is overly restrictive and is inconsistent with the aspiration to support economic growth and maximise the



provision of business floorspace as set out in supporting Paragraph 2.12 of draft Policy SP2 of the SDMPSAP. On this basis, we request that the allocation and justification section of the Site Allocation is amended to read:

“Retention and re-provision of business floorspace, with potential for ~~limited~~ intensification of business ~~use~~ floorspace and other commercial uses at ground floor level.”

Notwithstanding the above, we would reiterate our previous comments as set out in our Regulation 18 Consultation representations in respect of the Development Considerations section of the Site Allocation.

Affordable Workspace (Policy B4)

We recognise the need to provide affordable workspace as part of a cohesive and complementary set of flexible spaces required in campus developments, such as those currently being proposed at 10 – 18 All Saints Street. Notwithstanding, we consider that the level of affordable workspace provision is overly cumbersome and its application (as set out in supporting Paragraph 4.47) remains unjustified in the Council’s supporting evidence-base. Furthermore, we consider that the current requirements discourages the redevelopment of poor quality office buildings to meet the needs of modern office occupiers and undermines the Council’s target to deliver a net uplift of 400,000sqm of office floorspace by 2036.

Summary

Whilst we support the continued designation of 10 – 18 All Saints Street and the general aspirations of the draft SDMPSAP, as set out in these representations, we consider that minor amendments are required to the current site allocation and the Council’s affordable workspace policy in order to deliver a robust Local Plan which meets the ‘soundness’ test as set out in NPPF.

We welcome the opportunity to discuss our representations with you ahead of the formal submission of the draft SDMPSAP to the Secretary of State for an Examination in Public and



should you require further information or clarification on these representations please contact Katharine Woods at this office. In the meantime, we would be grateful if you could confirm receipt of these representations and request that we be notified of further opportunities to comment on the draft document accordingly.

Yours sincerely,

DP9 Ltd. **DP9 Ltd**