

SENT VIA EMAIL: (planningpolicy@islington.gov.uk)

ROK REFERENCE: WT/JD/R00323

Planning Policy Team
London Borough of Islington
Islington Town Hall,
Upper Street,
London
N1 2UD

18 October 2019

Dear Sir or Madam

**LONDON BOROUGH OF ISLINGTON
PLANNING ISLINGTON'S FUTURE: CONSULTATION ON THE DRAFT LOCAL PLAN
(REGULATION 19 STAGE)
SITE ALLOCATIONS DPD (REG 19) - REPRESENTATION ON BEHALF OF DOMINVS GROUP**

Following instructions from **Royal UK Properties III LLC**, ROK Planning have been commissioned to make representations in respect of the London Borough of Islington's ('the Council') ('LBI') Local Plan Strategic and DM Policies – Regulation 19 draft (September 2019).

Representations

Royal UK Properties III LLC previously issued representations in line with the Regulation 18 Stage version of the emerging Islington Local Plan dated 14 January 2019 and should continue to be read alongside these updated representations.

Therefore, the predominant focus of our representations continues to be in respect to employment and business growth and the optimisation of existing employment sites along with several affiliated policies which are important to address.

Policy B4: Affordable workspace

Policy B4(A) requires that within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe spatial strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road), Priority Employment Locations and Town Centres, major development proposals for employment floorspace (those involving 1,000sqm or more gross B-use floorspace) must incorporate at least 10% affordable workspace (as a proportion of overall gross B-use floorspace) 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(F) states Affordable workspace must be built to at least Category A fit out and must provide a high standard of amenity for occupiers, including access to relevant servicing and facilities.

As indicated by our representations submitted at the Regulation 18 Stage, it was our view that this policy needed to be strengthened to provide clear indication as to what constituted affordable workspace in terms of physical fit out.

In its response contained within the Local Plan Review Consultation Statement (September 2019), the Council states that:

“Category A fit out requirements will be clarified in the next version of the plan. Policy B3 sets out general business floor space design standards. Policy B4 and paragraph 4.43 sets out specific AW standards. The differentiation between conventional and affordable workspace is clear”.

Ultimately the policy refers only to being built to at least Category A fit out and provides general requirements at paragraph 4.54, we continue to contend this is not specific enough and requires more detailed guidance. The Council themselves acknowledge there is no standard definition for Category A Fit Out.

In addition, we continue to maintain that the policy is written broadly suggesting there is no differentiation in terms of conventional workspace and affordable workspace. Invariably this will impact on the viability and deliverability of a scheme, and due to ensuing construction and build costs, we also continue to consider that the provision of affordable workspace, to be delivered as part of any office scheme, should be subject to necessary viability testing and this should be considered in the draft Local Plan Policy.

Draft New London Plan Policy E3(C) requires that, ‘Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site specific locations or defining areas of need for certain kinds of affordable workspace’.

Paragraph 35 of the NPPF requires that emerging plans are prepared in accordance with legal and procedural requirements to ensure that they are sound. In order to determine the soundness of the plan this requires four tests of soundness to be applied including a proposed strategy being **justified** and **effective** over the relevant plan period.

We cannot see that there is express evidence provided in respect to the 10% affordable workspace figure required and particularly the impacts this may have on local markets including whether there is indeed clear demand for this type of space.

Policy T3: Car-free development

The policy states all new development will be car free and this includes residential and non-residential uses. This general approach taken to car parking borough-wide is supported and encouraged given the central location of the borough. This is consistent with the general thrust of national policy whilst the emerging London Plan (Policy T6.2) is encouraging car free development within CAZ and inner London boroughs.

The policy states at T3(G) that the Council will expect the maximum provision of disabled parking bays provided in accordance with best practice standards. In line with emerging London Plan policy T6.5 (Non-residential disabled persons parking) we consider the policy needs to be tightened given the London Plan policy states “at least one on or off-street disabled persons parking bay should be provided for all non-residential elements of a development” which provides greater flexibility in terms of the level to be provided.

Given certain site constraints generally within Islington (general high-density development within Islington) and proximity to the strategic highway network, it will be difficult to apply this on a borough-wide basis and should be considered on a site by site basis. This should be considered in light of servicing arrangements which may be required on-street subject to necessary justification as per the draft Local Plan policy T5.

Indicative of our representations at the Regulation 18 Stage, the need for explanation and further evidence is therefore required as to the levels prescribed within the draft policy which states;

“for major residential development, one on-street parking place for each wheelchair accessible dwelling should be provided. For employment uses, one on-street parking place for every 33 employees must be provided”.

In its response contained within the Local Plan Review Consultation Statement (September 2019), the Council state that:

“Policies on accessible parking will be amended in next iteration of the plan, although it is noted that the council’s approach will not align exactly with that proposed in the London Plan”.

These standards are not specific enough and require more detailed explanation and evidence, particularly in a locational sense i.e. certain areas may be more impacted by Controlled Parking Zones (CPZ) and parking restrictions.

The requirement for clarity is paralleled in TfL City Planning’s Regulation 18 Stage representation. TfL comment that: -

“Part G should be amended to reflect residential parking standards in Policy 16.1(G) and non-residential disabled person parking standards in Table 10.6 of the draft London Plan. Landowner request the policy be more in line with Policy T6.5 of the draft London Plan”.

I trust this is in order. I reserve the position to further amplify these representations as necessary during the plan review process and participate in the Examination in Public as necessary. In the meantime, if you have any queries relating to the proposals, please feel free to contact Will Thompson (noah.warwick@rokplanning.co.uk) (M: 07704 146935) or myself.

Yours faithfully



Jamie Dempster
Senior Planner
T: 07921 067 012
jamie.dempster@rokplanning.co.uk

