

Planning Policy Team,  
Freepost RTXU-ETKU-KECB  
Planning Policy, Islington Council,  
Town Hall  
Upper Street,  
London,  
N12UD

4<sup>th</sup> October 2019

Dear Sir/Madam,

**Representations on Islington Local Plan Review Proposed Submission (Regulation 19)  
Development Plan Documents – Strategic and Development Management Policies Policies,  
Site Allocations and Bunhill and Clerkenwell Area Action Plan (AAP).**

We write in respect of the above Local Plan Review Proposed Submission (Regulation 19) documents. These follow our formal consultation response to the Local Plan Review dated the 10<sup>th</sup> January 2019.

For the avoidance of doubt City, University of London (City) has no comment to make upon the Islington Local Plan – Site Allocations (September 2019).

**Islington Local Plan – Strategic and Development Management Policies (September 2019)**

City has limited but significant comments to make upon the Strategic and Development Management Policies.

City's main concerns with the draft policies relate to:

1. Land use; and
2. Design and Heritage.

**1. Land Use**

City is pleased that the Council is committed to working with key public and private sector partners including local Universities (paragraph 1.3) and that they recognise the role that Universities play in offering opportunities to tackle the root cause of worklessness and give young people opportunity to develop skills and learning (paragraph 1.38). City is committed to strengthening their relationship with the Borough.

Having examined the detailed policy wording against the overarching objectives sought by the Council (as set out in the supporting text to the policy) it is considered that the policy wording does not reflect and does not offer enough flexibility for the objectives of the policy to be achieved in practice.



## **Policy B1 – Delivering Business floorspace and Policy B3 Existing Business Floorspace**

Policy B1 criterion C states that the Council is committed to ensuring there is an adequate supply of business floor space in line **with job growth projections** and will protect existing business space throughout the borough through implementing planning policies which seek to ensure, **at least no net loss of business floorspace**.

The underpinning rationale for Policy B1 is job growth projections. However, it is considered the Council have taken an unduly restrictive approach to business and employment floorspace. Paragraph 4.6 makes the distinction between the two terms with 'business' floorspace considered to be uses that solely fall within the B use class. 'Employment' floorspace is then a broader term referring to activities and uses that generate employment (which includes offices and education).

Universities are a large employer within the Borough. This is acknowledged in the supporting text set out in paragraph 4.10 which states:

*Islington's economy is made up of a wide range of businesses and organisations, the majority of which are micro and small enterprises. Whilst these businesses make up the vast majority of the borough's enterprises, the majority of jobs come from a few larger businesses, as well as the borough's universities, hospitals, and the council itself.*

It is reasonable, after detailed examination of the policies and the supporting text to the policy, to come to the conclusion that **the clear policy objective is the creation of jobs in the borough**.

As job creation is unarguably the overarching objective of Policy B1 and B3 the approach to business floorspace and employment generating floorspace is illogical and perverse. If, as set out in paragraph 4.10, the borough's Universities help to create the majority of jobs within the Borough the emerging policies should allow for the expansion of university floorspace within the CAZ and those areas identified for intensive job creation such as the Bunhill and Clerkenwell AAP Area. The Policies are therefore not **justified** in its current drafting and are **unsound**.

We therefore suggest that the policy B3 criterion B should set out a further limb as follows:

- B. proposals resulting in the net loss of business floorspace within the CAZ, Bunhill and Clerkenwell AAP area, PELs, LSISs, Town Centres, LSAs, and non designated locations, either through change of use or redevelopment, will be refused unless there are exceptional circumstances which demonstrate:*
  - i. That the proposals are for higher educational use/ research facilities that would create employment and consequently not undermine the specific economic function of the area. In such circumstances marketing of existing floorspace shall not be required.*

## **2. Design and Heritage**

### **Policy DH1– Views**

We refer to our consultation response dated the 10<sup>th</sup> January 2019 (appendix A) which has been disregarded in the drafting of the Regulation 19 Proposed Submission Version.

City's representations stand in this regard. The blanket approach to protecting all views as set out in Policy DH1 is inappropriate and is not in line with the emerging London Plan approach.



It is still considered that the Policy should be amended to reflect the sensitivity of different views to change, and therefore state that those views which are important and sensitive to change should be protected. The fact that a proposal is visible within a view does not mean that it will be harmful. The Policies are therefore not **justified** in its current drafting and are **unsound**

### **Policy DH2 – Heritage Assets**

Our previous representations made on this policy still stand. The emerging Local Plan policy seeks to resist 'substantial harm' to conservation areas and listed buildings. It is considered that this is not consistent with national policy and would unduly restrict development in proximity to conservation areas and listed buildings unless the policy is amended so that substantial harm is resisted unless there are substantial public benefits arising from the proposal, as per paragraph 195 of the NPPF.

It is acknowledged that supporting text in paragraph 8.18 may be seeking to try and take into consideration the above representation however, it is still not consistent with National Planning Policy in that the exception to where 'substantial harm' is caused is substantial public benefits arising from the proposal. The current approach is therefore **not consistent with national policy**.

### **Policy DH3 – Building Heights**

Our previous representations made on this policy during the Regulation 18 consultation still stand.

Upon review of the Tall Buildings Study and the '*Local search and sieve analysis*' (November 2018) it is evident that the emerging Policy DH3 has been drafted on the basis of insufficient evidence regarding prospective locations for tall buildings. Unless the Tall Building Study maps the whole of the borough, on a site by site basis (legislation sets out that planning applications should be determined on their own merits) it is inappropriate to have a blanket protection and therefore the policy should include flexibility. In the absence of a robust evidence base City consider the policy to be **unsound**.

The policy would unduly restrain development and would not be in accordance with emerging New London Plan Policy D6 which states that "*Proposed development that does not demonstrably optimise the density of the site in accordance with this policy should be refused*".

As previously noted, the policy should be amended to recognise instances where there may be existing tall buildings which through redevelopment, extension or alteration could deliver public benefits including enhancements to townscape. Without this **the policy is unsound**.

### **Islington Local Plan – Bunhill and Clerkenwell Area Action Plan (November 2018)**

#### **BC46 (Northampton Square)**

In our previous representation we requested that the text from the existing Site Allocation (BC1) is carried over to the new Site Allocation given that the position remains current and accurate. Instead, the Council have sought to constrain the allocation further than the previous Regulation 18 consultation in early 2019 by noting "*increased teaching facilities may be suitable where they can be accommodated in line with other Local Plan Policies*".



**None of the other 51 allocations have this wording** (Apart from Cass Business School BC12).  
The above sentence is negatively worded and should be changed to:

*increased teaching facilities will be suitable where they can be accommodated in line with other Local Plan Policies*

Or

**Removed in its entirety** to be demonstrate consistent policy across all education premises in the Borough.

We request that the Council consider our previous representations made to the Regulation 18 consultation and the suggested wording which is reflective of the current position.

**BC12 (Cass Business School)**

As per Policy BC46 we requested that the current Allocation and justification text in Site Allocation (BC30) is repeated in BC46.

The Site Allocation has not changed in this regard but as per emerging BC46 the following text has been added:

*"Limited intensification for education floor space, including increased teaching facilities, may be suitable where they can be accommodated in line with other Local Plan policies"*

**None of the other 51 allocations have this wording** (Apart from Cass Business School BC46).  
The above sentence is negatively worded and should be changed to:

*"Limited intensification for education floor space, including increased teaching facilities, may will be suitable where they can be accommodated in line with other Local Plan policies"*

Or

**Removed in its entirety** to be demonstrate consistent policy across all education premises in the Borough.

We request that the Council consider our previous representations made to the Regulation 18 consultation (dated 10<sup>th</sup> January 2019) and the suggested wording which is reflective of the current position.

Please do not hesitate to make contact if it would be helpful to discuss the contents of these representations further. We look forward to further dialogue with The London Borough of Islington as the emerging planning policy progress is through the plan making process.

Yours faithfully,

**Kevin Gibbons**  
Director of Properties & Facilities



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