

- Edinburgh
- Glasgow
- Manchester

CHARTERED SURVEYORS

5 Bolton Street  
London W1J 8BA

Tel: +44 (0) 20 7493 4002  
Fax: +44 (0) 20 7312 7548  
[www.montagu-evans.co.uk](http://www.montagu-evans.co.uk)

PD12012/RV/SN

email: [Raoul.Veevers@montagu-evans.co.uk](mailto:Raoul.Veevers@montagu-evans.co.uk)  
[Sam.Neal@montagu-evans.co.uk](mailto:Sam.Neal@montagu-evans.co.uk)

16 October 2019

Planning Policy  
Islington Council  
222 Upper Street  
London  
N1 1XR

Sent via email and post

Dear Sir/Madam

**SUBMISSION OF REPRESENTATIONS TOWARDS ISLINGTON LOCAL PLAN CONSULTATION****PRIVATE & CONFIDENTIAL**

On behalf of our client, University Arts of London, we have the pleasure of submitting representations towards the following documents which are currently open for consultation:

- Islington Local Plan Proposed Submission Draft (Reg 19; September 2019);
- Islington Site Allocations Document Proposed Submission Draft (Reg 19; September 2019); and
- Bunhill and Clerkenwell Area Action Plan Proposed Submission Draft (Reg 19; September 2019).

As mentioned as part of previous representations, The University of the Arts London (UAL) is consolidating its estate and relocating one of its four main Colleges (The London College of Fashion) to a new bespoke 36,000 sqm Campus at East Bank, Queen Elizabeth Park. The Mayor of London announced the construction of the campus in June 2018. This facility will enable the University to retain its position as one of the premier arts colleges in the world, offering the very best facilities for its students. Once the new campus is available to the London College of Fashion a number of UAL sites will become surplus to requirement and their disposal will be required to fund the new campus. The campus is of London wide, if not national, significance.

To assist this process, UAL has requested that representations are made towards the draft Plans mentioned above to recognise the strategic benefit of allowing the relocation of this use elsewhere in London and the redevelopment of the site at London College of Fashion Golden Lane, Baltic Street East. Following the submission of the representations, UAL is keen to discuss the matters raised further with the Council.

**Draft Policy SC1: Social and Community Infrastructure**

During the previous representations, dated 17 December 2018, we requested that consideration was given to amending Part D (iii) of draft Policy SC1 and supporting text paragraph 3.148 to include references to 'universities and further educational institutions'. This was to take into account the UAL's current rationalisation programme to assist the funding for the new campus. As mentioned, should the proposed changes not be included it could impact on the ability of educational institutions to adapt.

Following our representations, we understand that changes were made only to the supporting text, paragraph 3.159, (previously 3.158; amendments in **red**) which states:

*"Proposals involving the loss or reduction of the public sector body's estate as part of a recognised asset/estates rationalisation programme may be acceptable, where details are provided to demonstrate*

*how rationalisation is addressing the existing and future community needs. A recognised public sector body's estates programme can include those produced for:*

- *hospital trusts and other health organisations;*
- *the emergency services (Metropolitan Police Service, London Fire Brigade, London Ambulance Service);*
- *public sector organisations who maintain a portfolio of community premises; and*
- *higher education institutions."*

Although it is positive to see amendments to the supporting text, the changes do not necessarily assist the UAL when taking into consideration their rationalisation programme. Although universities are an educational use, they do not fall under the generic public sector definition and in many instances are regarded as a private sector body. The current supporting text paragraph only provides support to public sector bodies specifically.

Therefore, similar to previous representations, we seek amendments to Policy SC1 Part D (iii) and supporting text paragraph 3.159 to provide greater comfort in relation to the UAL's rationalisation programme. Based on the recent amendments to include 'higher education institutions', we suggest the following amendments (in green) are made prior to the document being adopted:

Draft Policy SC1 Part D (iii):

*"The proposal involves the loss/reduction/relocation of social and community infrastructure uses as part of a rationalisation of a recognised public sector body's, or higher educational/university institutions, estates programme. The applicant will be required to provide a Community Needs Assessment demonstrating details of rationalisation, including that they have considered the needs of service users as part of any rationalisation strategy."*

Supporting text paragraph 3.149:

*"Proposals involving the loss or reduction of the public sector body's (or higher educational/university institutions) estate as part of a recognised asset/estates rationalisation programme may be acceptable, where details are provided to demonstrate how rationalisation is addressing the existing and future community needs. A recognised public sector body's estates programme can include those produced for:*

- *hospital trusts and other health organisations;*
- *the emergency services (Metropolitan Police Service, London Fire Brigade,*
- *London Ambulance Service);*
- *public sector organisations who maintain a portfolio of community premises; and*
- *universities/higher education institutions."*

#### [Site Allocation: LCF Golden Lane Site](#)

Following the submission of representations, dated 17 December 2018, we are pleased that the London College of Fashion's (LCF) Golden Lane Site has been put forward as a site allocation in the draft Bunhill and Clerkenwell Area Action Plan under reference BC5: London College of Fashion, Golden Lane.

The current 'Allocation and Justification' paragraph states:

*"Refurbishment of existing building for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. There may be potential for further intensification of office space through sensitive infill development on the undeveloped part of the site."*

To assist with the development of the new campus as part of their rationalisation programme, the ability for the university to promote a variety of uses on the site would be preferred. Any uses considered for the site would have to take into consideration Local and Regional Planning Policies. For example, we understand under draft Policy B1 of the draft Local Plan there is a requirement to focus new business floorspace in the CAZ and the Bunhill and Clerkenwell AAP in which this Site is located.

In addition, although the allocation makes reference that some infill development will be acceptable, no reference is made to the possibility for an increase of height to the existing building. Although there are some sensitive heritage assets in the locality, a well-designed proposal can have a minimal impact on such heritage assets. Flexibility for the applicant to demonstrate whether a proposal is acceptable would therefore be preferable.

Therefore, based on the above, we have proposed amendments to the 'allocation and justification' section as follows:

*"Refurbishment of existing building for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. Acceptable alternative uses may include residential and/or hotels, subject to meeting relevant local planning policies. There may be potential for further intensification of office space/other uses through sensitive infill development on the undeveloped part of the site. Any increase in massing/height would require a thorough assessment to demonstrate that any proposal does not have a major adverse impact on surrounding heritage assets."*

### Summary

The University of the Arts London (UAL) is consolidating its estate and relocating one of its four main Colleges (The London College of Fashion) to a new bespoke 36,000 sqm Campus at East Bank, Queen Elizabeth Park. Therefore, the UAL has requested that we make representations to the draft Plans mentioned above to assist in exploring the potential redevelopment of its Golden Lane site.

Following previous representations made in December 2018, consideration has been given to the Regulation 19 documents and whether further representations are required prior to the plans being submitted for examination.

Consideration has been given to draft Policy SC1 (Social and Community Infrastructure) and the suggestion has been made to amend the wording of the draft Policy and supporting paragraph 3.149 to include universities and higher educational institutions.

With regards to the Golden Lane site, we recommend that consideration is given to the draft Site Allocation and the ability to promote other uses on the development. In addition, the ability to consider an increase in massing/height, subject to an appropriate design.

Should you wish to discuss any of the above, please do not hesitate to contact either Raoul Veevers ([raoul.veevers@montagu-evans.co.uk](mailto:raoul.veevers@montagu-evans.co.uk) / 020 7312 7453) or Sam Neal ([sam.neal@montagu-evans.co.uk](mailto:sam.neal@montagu-evans.co.uk) / 020 7312 7468) who would be happy to assist.

Yours faithfully



**Montagu Evans LLP**