

**GERALDEVE**

Planning Policy Team,
Freepost RTXU-ETKU-KECB,
Planning Policy, Islington Council,
Town Hall, Upper Street,
London
N1 2UD

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldevve.com

18 October 2019

Our ref: J10375

Dear Sir / Madam

**London Borough of Islington Local Plan: Strategic and Development Management Policies
(Regulation 19) Consultation
Draft Bunhill and Clerkenwell Area Action Plan Regulation 19 Consultation
Representation on Behalf of Hondo Enterprises**

We write on behalf of our client Hondo Enterprises, to submit representations pursuant to the London Borough of Islington Local Plan: Strategic and Development Management Policies (Regulation 19) and the Draft Bunhill and Clerkenwell Area Action Plan (Regulation 19) September 2019 consultation.

Previous Consultations

LBI consulted on the Regulation 18 Draft Local Plan and the Regulation 18 Draft Bunhill and Clerkenwell Area Action Plan in November 2018. We previously submitted representations on behalf of Hondo, pursuant to the Regulation 18 consultation.

These representations should be read alongside the representations submitted previously.

We set out our representations below.

Local Plan: Strategic and Development Management Policies ('LPSDMP') (Regulation 19)

Bunhill and Clerkenwell

Draft Policy SP1 sets out the strategic objectives for Bunhill and Clerkenwell. The draft policy states that the draft Bunhill and Clerkenwell Area Action Plan ('AAP') will be responsible for setting out the policies for the area. We set out our comments on the draft AAP in the following section.

Employment Floorspace

Draft Policy B1 states that business floorspace will be focused in the Bunhill and Clerkenwell AAP and the City Fringe Opportunity Area. This is consistent with the draft AAP and draft Policy B2.

The prioritisation of office floorspace within this area is supported but it should be acknowledged that other ancillary commercial and community uses are required to support the economy and create a sense of place. Accordingly, we would suggest that a flexible approach is applied to supporting uses or multi use schemes which enable the delivery of office floorspace.

Draft Policy B2 goes on to state that a range of workspace typologies would be supported in this location and we are supportive of this flexibility as it allows employment floorspace to respond to market trends and demand.

Public Open Space

Draft Policy G1 has regards to green infrastructure. Within our representations to the Regulation 18 consultation, we stated that we agreed in main with the objectives of draft Policy G1, with particular support for parts C and D, which provide a good basis for securing the protection and improvement of open spaces within LBI.

Parts C and D within the regulation 19 consultation version still seek to protect and enhance open space. Opportunities to enhance underutilised and poor-quality open space, such as Finsbury Square should be supported.

Draft Policy G2 also seeks to protect open space. Part A of that policy states that **“development is not permitted on any public open space”**.

Whilst we support the protection of open spaces, in view of the Boroughs constraints regarding the shortfall of available development sites (as set out within the draft AAP) innovative multi use proposals which deliver development whilst retaining and improving the existing quantum of open space should be positively received. It should be recognised that the delivery of some development can have an important role in enhancing the use and function of that open space.

Policy G3 relates to the provision of new public open space. We support the objectives set out within Policy G3 part C, which requires schemes for new or improved public open space to inter alia **“accommodate and encourage physical activity for all, promoting walking, cycling and social interaction”**.

Part B of draft Policy G3 states that **“Public open space should normally be green public open space, such as a public park. Areas of new or improved hard landscaped public open space, such as civic space, may be considered appropriate”**.

To reiterate our regulation 18 representations, whilst we agree with the concept of requiring green space provision in the first instance, we suggest that draft Policy G3 should require an assessment of the quality, flexibility and usability of existing open spaces so that their use and capacity can be maximised.

With public open space being such a finite and under-provided asset in the LBI and indeed Greater London, it is not appropriate to encourage one type of single use public open space. Spaces that are used for only a single use are unsustainable insofar as facilities such as these will appeal to a small population only.

In turn such spaces only cater for limited groups and organisations and fail to benefit the wider population. This not only has cost implications for the provision and management of such public spaces, but also fails to provide useable open space for the greatest number of users and as such further exacerbates existing deficiencies.

On this basis we would suggest that the LPSDMP should favour the delivery of multi-use open space, requiring development proposals to be supported by a qualitative assessment of the

flexibility, functionality and overall appeal of public spaces could better secure the optimal use of the public open spaces for the greatest number of users.

Draft Bunhill and Clerkenwell Area Action Plan (AAP) (Regulation 19 Consultation)

Draft Policy BC1

Draft Policy BC1 seeks to prioritise office use within the AAP to meet the requirements of projected job growth within the Borough. To reiterate our previous representations (December 2018) we support the objective of Draft Policy BC1, with Bunhill and Clerkenwell being a well-placed location for the enhancement, modernisation and intensification of business accommodation within Islington.

Within our previous representations, it was noted that part B of draft Policy BC1 set an inflexible and prescriptive office space contribution for all development proposals providing a 500sqm or more net increase in floorspace.

Within the City Fringe Opportunity Area, this means that all development proposals providing 500sqm or more net increase in floorspace (any use class) must comprise at least 90% office floorspace.

In this regard, a Borough wide requirement at this level would in many cases render development infeasible thereby stalling development.

Within the regulation 19 consultation, part B of Policy BC1 now states:

“All development proposals providing 500sqm or more net increase in floorspace (within any use class) must comprise at least:

- (i) 90% office floorspace (as a proportion of the total net additional floorspace proposed) in the City Fringe Opportunity Area; or**
- (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 proposed policy wording has therefore not changed since the previous consultation and is still too perspective and does not afford any flexibility for changing market demand.

We would strongly suggest that the wording of Draft Policy BC1 part B is amended to provide some flexibility to enable and encourage development to come forward, whilst still prioritising office floorspace.

The 'limited circumstances' offered in part D of draft Policy BC1 provides some limited means of flexibility within the application of the policy, albeit these are highly prescriptive. We suggest that the draft policy is amended to embrace a greater level of flexibility to recognise the need for a robust assessment of the potential social and economic values alternative uses could provide. Policy BC1 should also make greater concession to site specific constraints and/or requirements that may influence development proposals, on a case by case basis.

Draft Policy BC3

Draft Policy BC3 has regards to the City Fringe Opportunity Area.

Part J of draft policy BC3 states that:

“J. The Council supports the enhancement of the public open space at Finsbury Square. Small scale commercial uses may be suitable on existing built-on areas of the square, but only where the functionality of the space is not adversely affected. Reconfiguration of the existing open space may be acceptable where functionality of the open space is improved and there is no net loss of public open space. Change to the use of the underground car park is supported in principle where it would be replaced by commercial uses, particularly business floorspace.”

Part J of draft Policy BC3 is clearly supportive of the principle of the improvement of Finsbury Square, subject to no net loss of public open space. Finsbury Square is an underutilised public open space and we support the improvement of public open spaces to ensure they are achieving their full potential.

Conclusion

In summary, we support the objectives set out within the LPSDMP and AAP and welcome the opportunity to comment. As identified within the LPSDMP, LBI's provision of residential and commercial accommodation is forecast to increase significantly over the plan period. This period of growth will place increased strain on access to public open space within the LBI and further exacerbate the identified shortfall. It is therefore crucial that the forecast growth is supported by the best possible strategy for the delivery of new and enhancement of existing public open space assets.

We support the objectives set out within the AAP, albeit we consider that the prescriptive rates of 80% and 90% office floor space are inappropriate and do not constitute sustainable development.

We believe that policies should be supportive of the opportunity for Finsbury Square to achieve its full potential to deliver high quality open space for residents of the area.

We trust that the comments received will be considered. If you have any queries, please do not hesitate to contact either Kevin Henson or Lucy Mills of this office.

Yours faithfully



Gerald Eve LLP

lmills@geraldeve.com

Tel. 02034863690

Mobile. +44(0)7554111621