

17 October 2019

Planning Policy  
Islington Council  
Town Hall  
Upper Street  
London  
N1 2UD

Dear Sirs

**Representation on the Draft London Borough of Islington Regulation 19  
Draft Local Plan****Introduction**

Thank you for the opportunity to comment on the London Borough of Islington's (LBI) Regulation 19 draft Local Plan: Site Allocations (SA) and Strategic and Development Management Policies (SDMP). Avison Young submit these representations on behalf of our client, London Metropolitan University (LMU) following representations made on the Regulation 18 draft Local Plan in January 2019. We note our previous representations have not been accounted for in the Regulation 19 draft and as such we continue to conclude that the draft Local Plan is unsound on multiple grounds.

These representations set out our concerns on the soundness of the draft Local Plan and recommendations to make the plan sound.

**1. Background Context – London Metropolitan University**

The University's estate lies predominantly within the LBI. As the primary higher education (HE) provider and an employer of over 1,000 people within the Borough, LMU is a significant local stakeholder in terms of its contribution to the local economy and as an education provider. It wishes to continue working collaboratively with the Council via its existing channels (such as Islington Living Wage Place Action Group, the Islington Skills Strategy Group, Islington Skills Strategy Delivery Group, Islington Career Pathway Programme, Upward Bound and Islington Outreach) and to work collaboratively with the Council during the local plan review period to ensure that an appropriately positive policy position is in place going forwards to support the delivery of its development needs.

At present the University has three campuses in Holloway, Moorgate and Aldgate. It attracts students from across the country and internationally. However, it has a very strong local student base including those enrolling from the borough and 75% from wider parts of London. A site plan of the University's landholdings in Holloway is enclosed at Appendix A.

As a result of historic reductions in student numbers over the last decade, the University is now about half its previous size. 93,000 sqm down from 156,000 sqm in 2012.

The University has already reduced its physical footprint with the redevelopment of its former premises at 263-269 Holloway Road for student accommodation following planning consent in 2014. This site has now been sold and developed by UNITE to provide some 856 student bedrooms. When this application was made it was explained that the University's Estates Strategy had identified that the estate should be reduced from 111,154 sqm to 85,489 sqm, equating to a figure of 4.8 sqm per student in full time education (FTE) compared with 6.6sqm per student FTE at the time. At the time of its disposal, 263-269 Holloway Road had been vacant for 20 years, and its sale was essential at that time to provide capital receipts that could be invested back into improving academic (teaching/research) accommodation at the University's main campus at 166-220 Holloway Road.

### **LMU Estates Strategy**

LMU's vision for the future is to lift the core performance of the University in academic quality and financial stability leading to improved reputation, enrolments, and teaching outcomes. The Strategic Plan acknowledges that the University's current efforts in this respect will take some time to take full effect and in the interim it is likely that student numbers will be at best stable. Therefore, the process of consolidation and space reduction is set to continue as the University seeks to "right size" its estate to enable it to provide the optimum offer to students.

As a result the University is planning proactively for a smaller university size, while at the same time lifting academic outcomes relative to other universities so that it can continue to attract new students. It has modelled what the University will look like in terms of students, curriculum and estate going forward and how this can be delivered in a financially sustainable way.

### Academic (Teaching/Research) Accommodation Needs

LMU is focused on providing a compact, better quality estate that provides the best quality educational experience to students. Currently LMU has surplus teaching space than it needs for both current and projected student numbers resulting in significantly underutilised space with average rates of space efficiency at around 30%. In addition, some space is not fit for purpose and is not making an effective contribution to meeting the University's needs. This has a financial cost and undermines the University's financial sustainability. The Estates Strategy includes an aim to increase space efficiency to 65% potentially rendering approximately 20% of existing floorspace redundant.

### Student Housing Needs

Despite the quantitative over-supply of teaching accommodation, the University suffers from a shortage of student housing for LMU students.

While there is student housing available in the borough (including at 263-269 Holloway Road), this is not secured for LMU students and instead serves students studying all over London, including Central London institutions. For example, Stapleton House has 856 bedrooms of which only 10% were let to London Met students in the 2017/2018 academic year. Rent levels start at £232 per week and rise to over £300 per week, which poses significant affordability issues for the University's students. As such, this facility, although conveniently located immediately adjacent to the University is playing a limited role in meeting the needs of LMU students. The Arcade and Bloomfield Court on Holloway Road collectively only provided accommodation for 100 students.

This means that in practice, LMU students struggle to find affordable, secure, good quality, conveniently located housing. Just 650 LMU students currently live in PBSA, with the majority reliant on sharing family sized homes in the private rented sector (which is subject to limited regulation and takes supply away from general needs housing).

This inability for the University to ensure adequate housing for LMU students is a key barrier to attracting students, and is a major weakness in its offer compared to other competing institutions. It is a particular welfare concern for first year students (particularly those from economically disadvantaged backgrounds and overseas) taking their first steps into independent living. Issues with availability of student accommodation have recently been exemplified by media reports of private student housing providers failing to deliver large numbers of student rooms by the beginning of the academic year which have already been secured by students, leaving students temporarily homeless. Addressing the lack of LMU managed student accommodation is a key priority for the University and goes to the heart of its duty of care to its students and improving overall student experience.

The University's key need is therefore to provide student accommodation, specifically for LMU students. LMU now has an aspiration to offer managed, pastorally supported and rent controlled accommodation for a minimum of 50% of first year undergraduates which, with growth in student numbers would equate to c1100 beds over the next five years.

### Overall Development Strategy

As the Holloway campus has significant surplus space for the reasons described above, this presents an ideal opportunity for the University to repurpose surplus and out-dated parts of the estate from teaching uses to student housing (via redevelopment) as part of its master plan, creating a well-balanced campus that offers students a residential campus experience, where they will have the best access to teaching and support facilities and the best chance to integrate with fellow students and staff. This is the best outcome for students and central to LMU's mission to transform lives through excellent education.

LMU's objectives set out above are intended to be delivered over the operative period of Islington's forthcoming Local Plan (2020/21 to 2035/6).

## **2. Local Plan Soundness Issues**

The NPPF paragraph 35 sets out the procedural requirements against which local plans are examined to understand whether they are 'sound' or not:

- a. **Positively prepared** – plans should meet objectively assessed needs
- b. **Justified** – an appropriate strategy
- c. **Effective** – deliverable over the plan period
- d. **Consistent with national policy** – accords with London Plan and NPPF

It is our view that the draft Plan is not sound on the following grounds:

- 1. It has not been informed by an objective assessment of the development needs of the Higher Education sector (including LMU) and fails to plan positively to meet such needs.
- 2. It has not been informed by an objective assessment of the needs for PBSA (including specifically for needs associated with LMU) and fails to plan positively to meet such needs.
- 3. The policy approach to tall buildings is unduly restrictive, based on the evidence.

As a consequence of the above, the plan is not positively prepared; not justified; and not consistent with national policy.

It is our view that the plan can be made sound by the following actions/amends:

- 1. Update the Infrastructure Delivery Plan to include an assessment of the needs of the HE sector (including specifically LMU), or produce a separate piece of evidence.
- 2. Update the Strategic Housing Market Assessment to assess the specific PBSA needs of LMU.
- 3. Amend draft Policies SC1, SP5, H1, H6 and site allocations NH13 and NH14 to put in place positive policies to support the delivery of the development needs identified in (1) and (2).

4. Update Policy DH3 to support tall buildings at LMU's Holloway campus.

We explain this below:

### **Higher Education Strategic Policy Position**

Local Plans should be based upon the fundamental principle of objectively assessing development needs and positively seeking opportunities to meet those needs (NPPF para 11). This should include making sufficient provision for education facilities (para. 20(c)).

This is reflected in London Plan Policy 3.18 (Education Facilities) (including para. 3.107) which requires local plans to assess the need for higher and further education facilities at the local and sub-regional levels and to secure sites for future provision recognising local needs and the particular requirements of the education sector. This is carried forward into draft London Plan Policy S3.

An assessment of some tiers of education is included in the Infrastructure Delivery Plan (IDP) dated 2019, however this does not cover Higher Education (nor the specific needs of LMU). We have been unable to identify any other local plan evidence that provides the need assessment required. Accordingly, the Local Plan is not capable of being positively prepared, justified, effective, or consistent with national policy.

In the first instance, the Council should prepare evidence that objectively assesses the needs of the HE sector (including LMU). LMU's needs are summarised above, and it would be keen to engage further with the Council to help address this evidence void.

Following this, it will be necessary to update the draft Local Plan to specifically support development that addresses the needs identified in the assessment. This could be via an update to Policy SC1 or an additional policy (which should be carried forward into updates to Policy SP5 and site allocations NH13 and NH14).

### **Student Housing Policy**

In accordance with NPPF para.11 and 61, Local Plans are required to objectively assess the housing needs of students and positively seek opportunities to meet those needs.

This is reflected in London Plan Policy 3.8(h) (and para. 3.107) which requires boroughs to identify the range of housing needs likely to arise within their areas and ensure that strategic and local requirements for student housing meet a demonstrable need. Emerging London Plan Policy H17 (PBSA) carries this forward by requiring boroughs to address local and strategic need for PBSA.

The draft Local Plan fails to meet the above requirements. The evidence base informing planning policy on PBSA is set out in Islington's Strategic Housing Market Assessment (SHMA) dated 2017. Whilst the SHMA assesses the general need for student housing in the borough, it does not address the specific needs of PBSA associated with LMU. In the absence of such evidence, Policy H6 (PBSA) and Policy H1(M) are not capable of being positively prepared, justified, effective, or consistent with national policy.

In order to make the plan sound it is necessary to update the SHMA (or prepare other evidence) that includes an objective assessment of the PBSA needs of LMU. It will then be necessary to update Policies H6 and H1(M) to account for the updated evidence base, which should be carried forward into updates to Policy SP5 and site allocations NH13 and NH14.

## **Site Allocation and Nags Head Area Policy**

We support the allocation of the site within the draft local plan (allocation ref. NH13 and NH14), however the allocation is unnecessarily restrictive and should be worded much more positively to reflect strategic policy on HE (discussed above). To accord with the stipulations of London wide and national HE policy, the allocation should support university related development to include refurbishment of existing buildings, infill development and redevelopment of existing buildings. The allocations should also be amended to specifically support the development of student housing where this accords with Policy H6 (taking account of the necessary amendments discussed above).

The same point applies to Policy H5 (Nags Head) which must also be amended to be much more positive about the University to include specifically supporting student housing at the Holloway Road campus.

## **Other Planning Considerations: Policy DH3 – Tall Buildings**

The University welcomes the new approach that the Council is taking to tall buildings following the Tall Buildings Study and the identification of a range of locations across the borough where buildings of more than 30m are acceptable in principle. It is noted that the LMU Tower site is one such site (C5 – up to 76m) and Site Allocation NH13 also refers to this.

45 Hornsey Road (SA ref. NH10) has also been identified as suitable for a building of up to 37m. It is considered that the part of the LMU campus which immediately adjoins NH10 should also be considered as a site for a tall building as this has very similar locational characteristics as the NH10 site and could form a townscape feature with this site.

In addition, other parts of the University's campus that are outside the strategic viewing corridor may also be suitable for taller elements and it is requested that the policy allows for this.

The existing context in the immediate area around Holloway Road station and the Emirates stadium sets a precedent for tall buildings including:

- 295 Holloway Road at 12 storeys has a maximum height of 40m.
- The existing University Tower on Holloway Road is 14 storeys equating to 56m in height.
- The Queensland Road Emirates Stadium housing development rises from 6 to 15 storeys (approximately 18m to 45m in height).

The buildings within NH14 offer potential opportunities for tall buildings. The raised railway viaduct running the length of the site on the north-west edge provides a buffer zone reducing the potential visual impact of any tall building(s) on residential neighbours to the north; and the site further benefits from the orientation with the railway viaduct sited to the north-west reducing potential overshadowing impacts. The depth of the site is sufficient to allow for setbacks and provision of an appropriate scale of buildings to Hornsey Road.

The masterplan opportunity to create a new pedestrian route from Holloway Road station to the stadium has the potential for tall building(s) to act as gateway markers. The draft policy identifies 45 Hornsey Road as a suitable site for a tall building and the redevelopment of the adjacent site has the potential to respond to this by creating an enhanced gateway and setting to the approach to the stadium.

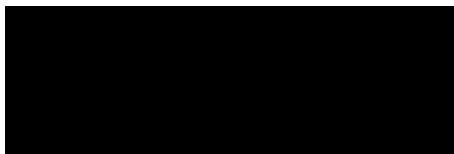
The University welcomes the opportunity for the local plan to reflect the surrounding context of the LMU sites and campus in identifying further potential for tall buildings. Indeed we consider this necessary to ensure its soundness.

## Conclusion

We trust that this representation is clear and can be registered and considered accordingly by the Borough. As noted above, LMU is keen to work collaboratively with the Council to bring forward a sound local plan that supports the University and optimises the potential benefits it can deliver to Islington over the plan period.

Please do not hesitate to contact me should you require any additional details or wish to discuss.

Yours faithfully



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**For and on behalf of GVA Grimley Limited t/a Avison Young**



## Appendix A

### London Metropolitan University Holloway Campus Site Plan

