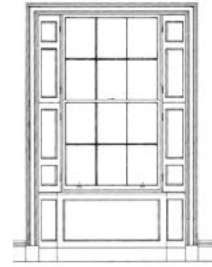


The Canonbury Society

C O N S E R V I N G C A N O N B U R Y



17th October 2019

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

Dear Planning Policy Team,

Comments on Islington's Local Plan Review - September 2019

Following on from our comments dated 27th February 2017 (first consultation exercise), our comments dated 26th March 2018 (Site Allocations Direction of Travel document), our comments dated 14th January 2019 (third consultation), we write again about the fourth consultation dated September 2019.

We have seen a draft copy of the comments by the Upper Street Association dealing with the Strategic & Development Policies as well as the Highbury Corner Site Allocation and we fully concur with their comments.

For this review, and adding to our previous commentaries, we have examined the Proposed Local Plan Submission (Regulation 19) documents but have focussed on (A) the Integrated Impact Assessment (IIA), (B) the Strategic & Development Management Policies and (C) the Site Allocations document. We comment as follows.

(A) Integrated Impact Assessment (IIA)

Table 2.1 Islington Local Plan Sustainability Framework (page 14, 17-18):

We welcome the fourteen IIA objectives as being sensible, realistic and attainable within the plan period of 2035.

Open Space (3.49- 3.53):

It is well known that of all the London boroughs, Islington has the least open space per capita. For a popular borough with a significant increase in population anticipated, provision must be made to safeguard what we have and create more open amenity space from disused land, possibly from redundant car parks. Ideally these should be open to the public but not

necessarily. For example, amenity land around public housing could be restricted to residents.

Cultural Heritage and Townscape and Heritage Assets (3.54-3.62):

We are delighted that Islington has 41 Conservation Areas amounting to 38% of the borough. It also has 19 Archaeological Priority Areas. The borough is rich in heritage assets as well as an interesting history of earlier settlements. It is right that the Local Plan acknowledges and celebrates this.

Assessment of likely effects of Local Plan Objectives (4.1-4.49):

The seven identified objectives are fine.

1. Homes – Delivering decent and genuinely affordable homes for all
2. Jobs and Money – Delivering an inclusive economy supporting people into work and helping them with the cost of living
3. Safety – Creating a safe and cohesive borough for all
4. Children and Young People – Making Islington the best place for all young people to grow up
5. Place and Environment – Making Islington a welcoming and attractive borough and creating a healthier environment for all
6. Health and Independence - Ensuring our residents can lead healthy and independent lives
7. Well-Run Council – Continuing to be a well-run council and making a difference despite reduced resources

Green Infrastructure policies (4.215-4.239), we thoroughly approve of your approach with Policy G1: Green Infrastructure; Policy G2: Protecting Open Space; G3: New Open Space and Policy G4: Biodiversity, landscape design and trees. We agree that all four policies are vital for mental and physical wellbeing as well as adding to biodiversity and ‘humanising’ and balancing the impact of high density living.

We think that the use of school playing fields out of hours should be encouraged. More artificial football pitches such as the one at William Tyndale Primary School should be built.

(B) The Strategic & Development Management Policies

Sustainable Design:

We support the council’s proposed policies S1 to S10. To reduce pollution and maximise air quality, we think the borough should undertake another round of tree-planting and encourage other owners to do the same. The council should also maintain its policy of actively managing Tree Preservation Orders.

Public Realm and Transport:

We recognise the difficulty in limiting vehicle movements in the borough when the uptake in local deliveries and Uber taxi services more than makes up the reduction in car ownership and usage in the borough. We support the council’s policy of car-free new residential developments. We think the apparent prioritisation of cyclists over public transport users should be re-examined.

We agree with the mayoral proposal to extend the congestion zone to the North and South Circular roads. We also think the congestion charge should increase but appreciate that this is out of the council's control.

As we noted in our comments about the draft Islington Transport Strategy 2019-2041, in terms of embracing 'smart technology', the council could go a lot further in setting out a more ambitious objective and policy. For example, there is no policy dealing with the challenges and benefits of driverless vehicles which could be commonplace in Islington and elsewhere within five years. Electric vehicle charging stations, as currently envisaged, could be made redundant if new technologies emerge which charge batteries in a radically different way.

Design and Heritage:

We support the council's proposed policies and its commitment "to conserve and enhance the significance of heritage assets and their settings and the wider historic and cultural environment".

As a group dedicated to preserving the Canonbury Conservation Area, we are concerned at the impact of any new policies which seek to limit the current protection afforded to conservation areas (CAs). We are also concerned at the encroachment any new development which will negatively impact on the local character of a CA. We appreciate that different CAs have different local characteristics which is why the Islington Council Conservation Area Design Guidelines dated in 2002 are so useful. We urge the Conservation Department of the Council to update these local guides to be read in conjunction with the more general but comprehensive SPD Urban Design Guide issued in 2016.

We are pleased to see that throughout the draft Local Plan, the importance of conservation areas is highlighted.

We are encouraged by the council's determination that any developments involving basements will be strictly controlled. Policy DH4, which regulates the development of basements, is vital in this regard.

C) Site Allocations:

We would like to comment on the three site allocations at Highbury Corner namely HC1, HC3 and HC4.

HC1 and HC3 relate to Highbury Corner and Highbury & Islington Station respectively. We agree with your Allocation and Justification for future uses. It would, however, be beneficial for the community and for the long-suffering passengers if these redevelopments could be looked at holistically.

We remain unconvinced that the current changes to the Highbury Gyratory represent an improvement because they fail to address the plight of bus passengers and pedestrians who in our view are considerably worse-off than before the works began. We think these proposals should have been delayed until a comprehensive plan could be drawn up to incorporate your proposals for HC1 and HC3. We hope that this 'lost opportunity' can be recovered in time so that the station and its immediate environs can be redesigned and reconfigured (and beautified) to the benefit of residents and visitors to the borough for decades to come.

In respect of HC4 – Dixon Clark Court, we have followed the planning application for additional housing, community space and public realm improvements and look forward to the works commencing next year.

In general, we think the review documents establishing Islington's new Local Plan are well considered and appear to capture many of the comments emerging from earlier reviews.

We look forward to your conclusions and working with the new Local Plan in due course.

Yours faithfully

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Chairman

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