

Local Plan

Topic Paper



Bunhill and Clerkenwell Area Action Plan

February 2020

Contents

1. Introduction	3
2. Policy framework.....	4
National Planning Policy Framework.....	4
The London Plan	4
Existing Local Plan policy	6
3. Background.....	9
Employment Land Study.....	10
London Office Policy Review	12
4. Discussion.....	14
Policy BC1 Prioritising office use	14
Policy BC2 Culture, retail, and leisure uses	18
Area Spatial Strategies	23
City Fringe Opportunity Area	24
5. Consultation responses.....	26

1. Introduction

- 1.1 This topic paper sets out the justification for policies in the Bunhill and Clerkenwell Area Action Plan (BCAAP), which forms part of Islington's Local Plan.
- 1.2 This paper summarises the relevant local, London-wide, and national policy and reviews and explains the evidence which supports the BCAAP. This paper also responds to the key issues raised during consultation.

2. Policy framework

- 2.1 National and regional planning policies encourage local planning authorities to anticipate the needs of businesses and provide for them to support economic growth.

National Planning Policy Framework

- 2.2 Section 6 of the National Planning Policy Framework 2019 (NPPF) sets out national policy for building a strong, competitive economy. The NPPF states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” (paragraph 80)

- 2.3 It also states that: “planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances” (paragraph 81)

The London Plan

- 2.4 The London Plan referred to in this paper is the Intend to Publish version December 2019. The London Plan – which is the Spatial Development Strategy (SDS) for Greater London - provides the London-wide planning framework to guide local plan-making. Local Plans must be in general conformity with the London Plan.

- 2.5 The Mayor’s responded to the regulation 18 Local Plan consultation (November 2018) and found the Draft Islington Local Plan to be in general conformity with the new London Plan. The Mayor also welcomed Islington’s approach in identifying the Bunhill and Clerkenwell area for predominantly office growth which, being in the Central Activities Zone (CAZ), is in line with Draft New London Plan Policies E1, SD4 and SD5. The Mayor also set out support for a number of specific policies within the BCAAP, being:

- Policy BC1, which is in line with London Plan Policies SD1, E1, and E8,
- Policy BC2, which is in line with London Plan Policy HC5,
- Policy BC3 City Fringe Opportunity Area including identification of sites potentially suitable for tall buildings, in line with London Plan Policy D8,

- Policy BC4 City Road including expansion of the decentralised energy network, and
- Policy BC8 Historic Clerkenwell which is in line with London Plan policy HC1.

2.6 The Mayor of London also responded to the regulation 19 consultation on the Local Plan and continued support for the policies of the BCAAP. In particular the Mayor supports Draft Local Plan Policy B2 and directing office use to the CAZ, the Bunhill and Clerkenwell area, Spatial Strategy areas within the CAZ and Priority Employment Locations and not to the borough's industrial areas. The Mayor states that this approach is in line with draft new London Plan Policies E1 and SD4. The representation also states that BCAAP policy BC1 reflects Policy E1 of the draft London Plan, prioritising office development within the CAZ. It is also in line with London Plan Policy E8 which promotes office development in the City Fringe / Tech City cluster, which is recognised as one of London's nationally significant office locations.

2.7 The new London Plan has policies which place a greater weight on the importance of office functions over residential functions in the CAZ when compared with the existing London Plan.

Policy GG5 (Growing a good economy) states:

"To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:" ...

"(BA) seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city." and

"(C) plan for sufficient employment and industrial space in the right locations to support economic development and regeneration"

2.8 Policy SD4 (Central Activities Zone) states:

"As a whole, the CAZ supports a nationally and internationally significant scale and agglomeration of offices, enabled by the hyper-connectivity of its public transport infrastructure. The CAZ has important clusters in areas such as tech, the creative industries and life sciences, adding to its strengths in the business, professional and financial services sector, arts and culture, health, education and law. A supportive policy approach to the wide variety of business space requirements, quality and range of rental values is essential to enable these sectors to flourish and for small and medium-sized enterprises to fulfil their economic potential alongside larger businesses." (paragraph 2.4.6)

2.9 Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states:

"A: New residential development should not compromise the strategic functions of the CAZ." ...

"C: Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ ..."

"H: Residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices" ...

"I: Local approaches to mixed-use development of offices with housing should sustain strategically-important clusters of commercial activities within the CAZ" ...

“The CAZ is an internationally and nationally significant office location, complemented by the Northern Isle of Dogs and Tech City.” (paragraph 2.5.1)

- 2.10 The London Plan also details the demand for and importance of office floorspace, stating:

“Table 6.1 indicates that the CAZ and the Northern Isle of Dogs are projected to accommodate more than 367,000 additional office jobs and a net increase of 3.5 million sq m (GIA) of office floorspace over the period 2016- 2041/18, an average of 140,000 sq m per annum. The provision of a range of office floorspace in terms of size, quality and cost should be supported through a combination of intensification, redevelopment and refurbishment whilst ensuring a suitable supply of secondary stock, which provides relatively affordable lower-cost market provision of business space (see Policy E2 Providing suitable business space and Policy E3 Affordable workspace).” (paragraph 2.5.2)

- 2.11 The London Plan also prioritises the development of office floorspace above residential in the CAZ, stating:

“Given their strategic importance, as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy). The principle of greater weight is designed to ensure that the agglomerations of offices and other CAZ strategic functions are not compromised by new residential development. The principle should inform Local Plan preparation and development management.” (paragraph 2.5.3)

- 2.12 The BCAAP embeds these priorities into the plan policies to strengthen the strategic function of the CAZ.

City Fringe Opportunity Area Planning Framework

- 2.13 The City Fringe area is defined as an opportunity area in the London Plan. It is located to the north and east of the City of London’s Financial District and occupies areas including Dalston, Hackney, Haggerston, and Whitechapel, as well as area around Old Street. The Draft London Plan includes indicative targets for 15,500 homes and 50,500 jobs in the City Fringe OA, among the highest targets for growth for opportunity areas in the capital.

- 2.14 The City Fringe OA Planning Framework was created by the Mayor of London and adopted in 2015. The City Fringe OA Planning Framework does not create policy but provides guidance that supplements the Mayor’s London Plan and the relevant borough policies for the City Fringe.

- 2.15 The City Fringe OA contains significant development capacity to support London’s critical mass of financial and business services but also cluster of digital businesses that constitute Tech City. Consolidation of the digital cluster and continued business growth in the core areas of the City Fringe OA are strategically vital for London and the nation. One of the key objectives of the planning framework is to ensure there is the space for continued business floorspace growth in the City Fringe.

Existing Local Plan policy

- 2.16 The Council’s existing development plans protect existing employment floorspace and encourage development of new employment floorspace in the borough. The existing development plan documents are:

Core Strategy

- 2.17 Objective 7 of the Islington Core Strategy is: “maintaining the growth in employment by ensuring a broad range of opportunities exist for all types and sizes of businesses across all parts of Islington”. Objective 9 is “ensuring a range of provision of shopping, leisure and local services which serve the local community and support Islington’s economy”.
- 2.18 Core Strategy policy CS13 on employment spaces states that the council will provide employment space for businesses in the borough encouraging new employment floorspace, in particular business floorspace, to locate in the CAZ and town centres where access to public transport is greatest.

Finsbury Local Plan (existing AAP for the same area)

- 2.19 The Finsbury Local Plan is part of the existing development plan for Islington. It will be replaced by the BCAAP.

BC8 Achieving a balanced mix of uses

- 2.20 Policy BC8 of the Finsbury Local Plan protects existing employment floorspace from being lost and ensures that new developments maximise the amount of employment floorspace provided. Employment Priority Areas BC8 states that no net loss of business floorspace will be permitted and proposals should incorporate the maximum amount of business floorspace reasonably possible on the site.
- 2.21 Part C of this BC8 states that within the Employment Priority Areas the proportion of office floorspace provided within a development or through change of use should be optimised, and also that retail or leisure uses may be provided at ground level where an active frontage would enhance the street environment, or where these uses would complement or extend the offer of neighbouring clusters of retail or leisure uses.
- 2.22 This policy also requires major office developments to provide a proportion of housing in line with the adopted London Plan Policy 4.3. However this policy requirement for housing has not been included in the BCAAP as the ‘parent’ policy in the London Plan has not been carried forward to the new London Plan. Furthermore, the intent behind the policy was to compensate for situations where mixed-use development was not secured on site. The priority in the BCAAP is for office-led development, hence mixed-use is not generally sought.

BC9 Tall buildings and contextual considerations for building heights

- 2.23 Islington’s previous tall building policy was BC9 in the Finsbury Local Plan as all the potential tall buildings area were in the Finsbury Plan Area. Policy BC9 states that buildings of 30 metres in height or more may be appropriate only within the areas indicated on Figure 17. Figure 17 shows clusters around City Road Basin, Moorgate, and Old Street roundabout. Elsewhere, building heights must respond to the local context, particularly those contextual factors indicated on Figure 17. For more information on the Council’s policy on tall buildings refer to the tall buildings topic paper.

Site Allocations

- 2.24 A total of 48 site are allocated in the Finsbury Local Plan. Each allocated site has identified appropriate land uses, design guidance, and a likely timescale for development. These sites allocations are included within the Finsbury Local Plan (not the Site Allocations document which applies to the remainder of the borough) to

ensure that a self-contained and cohesive planning strategy is provided by the Finsbury Local Plan. This approach continues in the Bunhill and Clerkenwell AAP where 51 site allocations are included in the BCAAP.

Public Realm Projects

- 2.25 There are opportunities to improve the public realm throughout Bunhill and Clerkenwell, to improve conditions for walking and cycling, to reduce the impacts of traffic and congestion, and to provide more open space. The BCAAP identifies a number of these public realm projects within the Area Spatial Strategies.

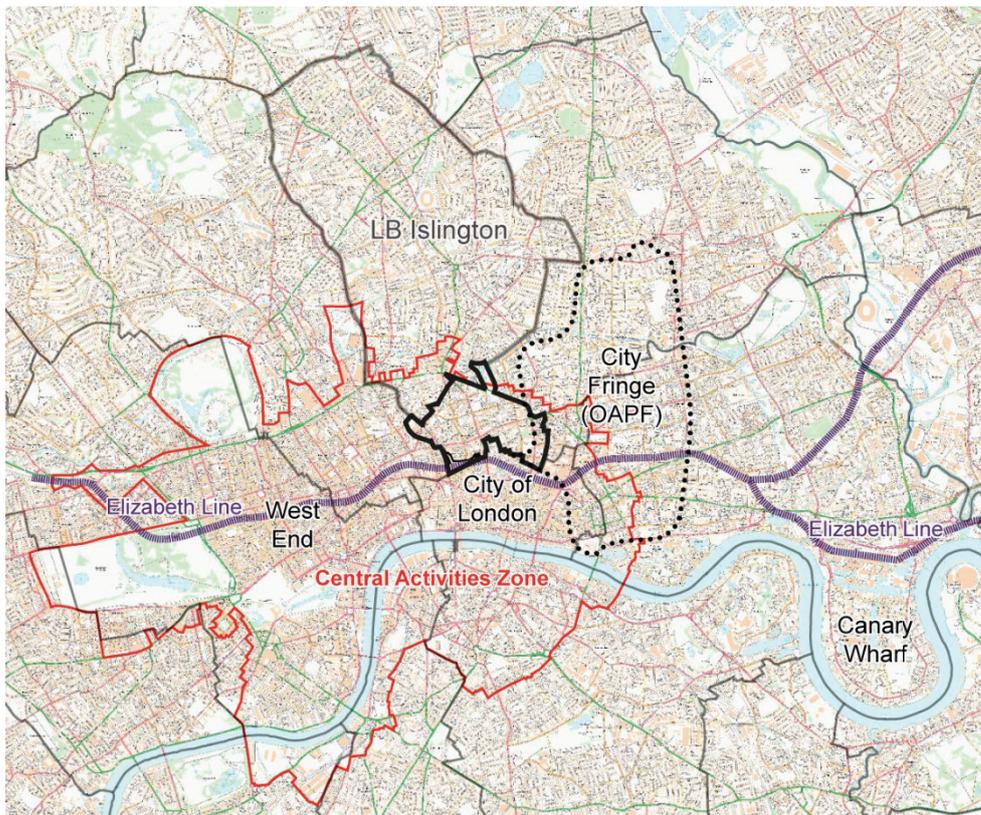
Historic Assets in Clerkenwell

- 2.26 Appendix 1 of the BCAAP contains a list of historic features and buildings in Clerkenwell which were identified by previous work undertaken by the Council and which were also recorded in the Finsbury Local Plan. Some of these features are listed, some are on the local list of non designated heritage assets, but in many cases the heritage value of a particular asset is only noted in the BCAAP. These features have heritage value and should be protected in accordance with the Local Plan policy DH1.

3. Background

- 3.1 The BCAAP will replace the Finsbury Local Plan and continues the same approach taken in this document, i.e. it sets out a number of spatial policies with some area-wide policies and a number of site allocations.
- 3.2 The boundary of the BCAAP area (shown in Figure 1 below) is unchanged from the Finsbury Local Plan. The boundary contains a large proportion of the Central Activities Zone of Islington.

Figure 1: BCAAP boundary and strategic context



The purpose of the BCAAP

The area is the key commercial and employment centre in Islington, and is also home to a variety of education, cultural, and medical uses. It is a focus for creative and tech clusters including Tech City. Bunhill and Clerkenwell has a rich variety of entertainment and leisure uses, restaurants, bars, pubs, and cafes. The area is also home to a significant residential population.

The area plays a critical role for London as a World City. The area is very well connected to Central London and to the wider South East and this will be further improved upon completion of the Elizabeth Line (formerly known as Crossrail). Land values are high and different uses compete fiercely for space in the area.

Bunhill and Clerkenwell is expected to experience significant growth in the coming years, primarily for commercial, cultural, and entertainment uses. The AAP aims to ensure that this growth is managed to secure a high quality and sustainable urban environment, to promote economic growth and employment, and also to address the deep challenges including deprivation, social mobility and environmental problems.

Bunhill and Clerkenwell contains areas with high levels of deprivation and there is a great disparity between the opportunities of the richest and poorest in the area. There are also environmental challenges, such as the need to minimise emissions of greenhouse gases, and also local environmental problems, like poor air quality, traffic noise and congestion. There is a need for more green space and green infrastructure like green walls and roofs.

Employment Land Study

- 3.3 Islington has a significant need for additional office floorspace. The Islington Employment Land Study 2016 (ELS) is the key evidence document relating to the demand for office floorspace, and this is discussed in detail in the topic paper for employment. A summary of the key points is set out below, including sections of the ELS that are relevant to Islington's CAZ.
- 3.4 Employment growth projections for Islington for the period 2014-2036 forecast an additional 50,500 jobs, the majority of which are office based jobs. When translated into floorspace requirements, this equates to a requirement for an additional 400,000sqm of office floorspace.
- 3.5 For several years, the Borough has been continually losing significant amounts of business floorspace. Between 2015 and 2018 a total of 42,675sqm of office floorspace was lost through redevelopment. Much of this loss is as a result of the office to residential permitted development right.
- 3.6 The strongest demand for offices, reflected in high rental values, is within the CAZ where businesses can take advantage of the agglomeration benefits with similar and supporting uses, proximity to other office markets, and also to major transport hubs.
- 3.7 High demand for offices due to high employment growth projections, low supply due a lack of available land, and ongoing losses to existing supply has created a severely constrained supply demand balance, where demand far outstrips supply. This could be detrimental to sustaining a successful economy and accommodating further economic growth in Islington.
- 3.8 The commercial property market in which Islington is located remains strong and the employment sector analysis shows that the professional and technical services sector, as well as the information and communications sector, is set to grow even further, reinforcing the need to ensure an adequate supply of offices.

The Employment Land Study also states:

“Islington's CAZ area... lies at the epicentre of the rapid and profound changes taking place within the central London office market ...(and) the area is proving highly attractive to creative and digital businesses – both start-up and established”¹.

“...the quantum of stock has changed only marginally over the past decade, despite changes in the demand profile. This has resulted in sharply falling availability...”².

“whilst there has been some new development, it has not kept pace with the profile of occupier demand”³.

¹ Employment Land Study paragraph 5.3.1

² Employment Land Study paragraph 5.3.4

³ Employment Land Study paragraph 5.3.5

Since mid-2008 some 29,900sqm of offices have been added to an area closely corresponding to Islington's CAZ⁴, but it should be noted that this represents an increase of just 2.7%.⁵

"The lack of new supply set against rising take-up has led to falling levels of available space. URS/JLL estimate availability at 3% (<40,000 sq m), which is a historically low figure for the wider central London market. An availability ratio of 6%-8% is generally considered the point below which upward pressure is placed on rents."⁶

"Local agents report that demand and rent levels in Islington's CAZ area are behaving in a similar fashion to the wider CAZ property market. Occupier demand within the CAZ is predominantly from financial, professional and creative services, and rental levels reflect those in the wider City of London market. Relatively constrained supply, combined with consistent take-up in recent years has placed upward pressure on rents, and good quality space within the CAZ fringe area is now on a par with that in core areas. Prime, institutional grade space is now letting for in excess of £50 per sq ft and, largely because of demand pressures, rents on lower specification space designed for creative businesses, are reaching the same level."⁷

3.9 The study notes that there been some large scale completions in the area, particularly Ropemaker Place in 2009 completions, and King's Place in 2008 which have buoyed historic completions data, and that these are long completed. In almost every location, Islington has seen large-scale and continual attrition of not just its B2 and B8 space, but also its office base.

3.10 The ELS reports also describes how the CAZ Fringe⁸ office sub market is strengthening, which the Council believes will also drive demand within the CAZ for office development. The ELS states in the past rental discounts acted a strong incentive to cost conscious creative companies to locate in the CAZ Fringe. However in recent times rental prices have increased and this area has become a mainstream commercial property market. The Employment Land Study predicts that the area will be subject to a number of factors that will drive further rental increases in future⁹. Some of the factors driving this are:

- The King's Cross Central scheme will anchor a substantial sub market popular with office occupiers and will likely encourage office demand to and rents to rise¹⁰ (King's Cross Central is located outside the AAP area however it will impact the office market conditions within the study area), and

⁴ URS & JLL (2014) Tech City/City Fringe OAPF Property Market Appraisal GLA: This report describes an area they call the Northern Fringe which corresponds closely to Islington's CAZ. Refer to paragraph 5.3.2 of the Employment Land Study

⁵ Employment Land Study paragraph 5.3.6

⁶ Employment Land Study paragraph 5.3.7

⁷ Employment Land Study paragraph 5.3.14

⁸ The ELS defines the CAZ Fringe as the general area immediately beyond the CAZ boundary (distinct from the specific City Fringe OAPF).

⁹ Employment Land Study paragraph 5.1.15

¹⁰ Employment Land Study paragraph 5.1.18

- The opening of the Elizabeth line (Crossrail) with the station at Farringdon will encourage further regeneration and confirm the area's status as a key London office sub-market.¹¹

Permitted development rights for change of office to residential uses

- 3.11 In May 2013, the Government introduced a new permitted development right to allow offices to convert to residential use. The Central Activities Zone (CAZ), part of which covers the south of Islington, is currently exempted from this permitted development right, however, this exemption was removed in May 2019. As such, the Council has confirmed an Article 4 Direction to remove the permitted development right and this came into force from March 2019. An Article 4 Direction to remove the PD right in certain locations outside of the CAZ came into force in September 2014.
- 3.12 Despite these protections the office to residential permitted development right has resulted in significant losses of B1a space in the borough. December 2018 figures show that:
- 34,000sqm of office floorspace was converted to residential between May 2013 (when the permitted development right was introduced) and December 2018,
 - 8,500sqm of office to residential conversion was under construction, and
 - 2,000sqm of office to residential conversion existed in extant unimplemented schemes.
- 3.13 This equates to approximately 44,500sqm of floorspace lost or potentially lost, or approximately 2,900 jobs.

London Office Policy Review

- 3.14 The London Office Policy Review 2017 (Radimus 2016) was commissioned by the Mayor to provide a regular monitor to ensure that London Plan policies are delivering sufficient capacity to accommodate office activities. The main findings of this report are summarised in the topic paper on employment.
- 3.15 The London Office Policy Review forecasts high demand for employment growth in the borough, and that supply and demand analysis provided arrives at similar figures to those in the Employment Land Review.
- 3.16 The following section summarises other conclusions of the London Office Policy Review of particular relevance to the policy BC1 in the BCAAP.
- Brexit has caused great uncertainty over long-term outlook for London offices, however the early impact on the property market has been modest. There have been a number of large scale investment deals post the Brexit referendum which indicate ongoing confidence including Amazon Shoreditch, Apple at Battersea, and Google at King's Cross. These will have beneficial effects on supply chains and will support the technology cluster¹².
 - The City of London is a classic economic cluster where strong supply chain relationships reinforce the benefits of agglomeration. As well as the financial sector, there are subsectors (insurance, investment banking) as well as

¹¹ Employment Land Study paragraph 5.1.19

¹² London Office Policy Review page xiv

accounting, legal, and management consulting sectors. These sectors also have complex relationships with the creative and digital services sectors¹³.

- The setting of a building, including the quality of public realm and nearby amenities has become an increasingly important part of location decision making for office uses. Employers and employees are looking for amenities including food and drink, health, wellbeing, and leisure uses, and a quality public realm include public squares, curated public / private spaces, and street markets¹⁴.
- Contrary to some expectations technology has not liberated businesses from their traditional locational ties. Over the last decade businesses which might have exploited new communication technology (e.g. video / web conferencing) to locate in cheaper locations have done the opposite, by locating in London with large physical presences. Key examples of this are Amazon, Apple, Facebook, Google, and Twitter, amongst others. The London Office Policy Review explains this by stating that:
 - "...the office provides a vehicle for creating a sense of common purpose, or business culture, and it allows for corporate governance. It allows staff to be mentored and trained. And it provides an environment in which colleagues can socialise, collaborate and share knowledge. And the means to do all this with least friction (in terms of travelling to work, access to skilled staff and so on) is to locate centrally and provide a hub, allowing workers from disparate locations to congregate"¹⁵

Agglomeration benefits

- 3.17 The BCAAP area is a major centre of employment, accommodating over 160,000 jobs; this represents approximately 70% of the jobs in Islington. The area has such a large number of jobs that it ranks 28th of the 348 local authorities in England and Wales, with more jobs than Oxford, York, or Cambridge.
- 3.18 In addition to having a large number of jobs, the area features or is located next to other centres of employment, including the financial hub of the City of London, the City Fringe Opportunity Area including Shoreditch and King's Cross and the Knowledge Quarter¹⁶; it is also easily accessible from the West End and Canary Wharf, and will become more so on completion of the Elizabeth Line.
- 3.19 Offices developed in the BCAAP area may benefit from being closely located with some or all of these economically significant locations, and the organisations, businesses, and business support services located within them.

¹³ London Office Policy Review paragraph 2.1.65

¹⁴ London Office Policy Review paragraph 3.1.21

¹⁵ London Office Policy Review paragraph 3.1.38

¹⁶ The Knowledge Quarter refers to a cluster of organisations around King's Cross, Euston Road, and Bloomsbury and the organisation that promotes collaborative sharing of knowledge between them. The cluster contains over 80 organisations and includes The Francis Crick Institute, The Wellcome Trust, The British Library, The British Museum, UCL, SOAS, UAL, and the University of London, amongst many others.

4. Discussion

Policy BC1 Prioritising office use

- 4.1 Policy BC1 is one of the key policies in the BCAAP. It strongly promotes office development, reflecting the strategic role of Central London and the significant amount of office floorspace required to meet jobs projections to support Islington's economy.
- 4.2 The trigger for this policy was set at schemes providing net additional 500sqm of commercial floorspace. This threshold was selected instead of the higher threshold of all major developments (i.e. all schemes providing net additional 1,000sqm of commercial floorspace) because of the significant contribution that smaller schemes make to office floorspace delivery in the borough. In the five-year period spanning FY2014 to FY2018 11% of all office floorspace delivery in the borough was in schemes providing between 500 and 1,000sqm net additional office floorspace.
- 4.3 Islington also has a significant need for new housing, particularly affordable housing, however the Council maintains a healthy five-year housing supply and can demonstrate that it will meet its housing targets with policy BC1 in place. Further information on housing delivery is provided in the housing topic paper.
- 4.4 The provision of office floorspace will also contribute to London Plan Good Growth objectives, through the provision of 10% affordable workspace in line with Local Plan policy B4 and also through the provision of training opportunities through Local Plan policy B5.
- 4.5 Policy BC1 requires new development in the BCAAP area to be office led, and sets minimum proportions of office floorspace (90% in the City Fringe Opportunity Area and 80% in the remainder of the BCAAP area). These high minimum proportions of office floorspace are required to meet the forecast office floorspace requirement set out in the Employment Land Study and taking into account borough trends. There are a number of exceptions where this policy does not apply, including the expansion of some protected uses, publicly funded uses, or some types of smaller scale residential developments where office uses are not appropriate.
- 4.6 The policy applies on net uplift rather than gross floorspace of a whole scheme. This ensures that developments with existing non office uses may retain those uses in redevelopment, and ensuring that pre-existing uses can redevelop and remain in the same location¹⁷. Table 1 below provides an example of how the policy would apply in terms of gross and net floorspace.

¹⁷ The Regulation 18 draft policy (November 2018) applied to gross floorspace; the change in the Proposed Submission version was made in response to consultation comments and further considerations by the Council. Further information is provided in the Consultation Statement.

Table 1. Example application of policy BC1

	New build scheme		Extension	
Existing floorspace	0sqm		1,000sqm	
Additional floorspace (uplift)	1,000sqm		500sqm	
Total floorspace	1,000sqm		1,500sqm	
	City Fringe Opportunity Area	Remainder of the AAP area	City Fringe Opportunity Area	Remainder of the AAP area
Requirement for office (B1a)	900sqm (90%)	800sqm (80%)	450sqm (90%)	400sqm (80%)
Other appropriate uses	100sqm (10%)	200sqm (20%)	50sqm (10%)	100sqm (20%)

- 4.7 The proportion of office floorspace required by policy BC1 will ensure that new development is office-led, with other uses being a small proportion of the overall development, playing a supporting role in terms of the function of the area. This reflects the high priority which the plan gives to office development in the CAZ.
- 4.8 By way of example¹⁸, if a building typology typical to many areas in Bunhill and Clerkenwell is considered, comprising 7 storeys (6 storeys with a basement) with full site coverage and floorplates of equal area on each floor, this would give the following breakdown of space:
- In the City Fringe Opportunity Area, up to 70% of one floor (e.g. the ground floor) could be used for supporting non-office uses, and
 - Elsewhere in the AAP area, all of one floor, and up to 40% of an additional floor could be used for supporting non-office uses.
- 4.9 In the case of an extension provided with two additional storeys:
- In the City Fringe Opportunity Area 90% of the uplift must be office floorspace, therefore 20% of one of the two additional storeys may be non-office uses, and
 - Elsewhere in the AAP area, 80% of the uplift must be office floorspace therefore 40% of one of the two storeys may be non-office use.
- 4.10 The supporting uses will often provide services for office workers, like cafes and shops, and will provide active frontages to the ground floors. The non-office floorspace of BC1 may also be provided as residential development. In accordance with policy DH5 all supporting uses must adhere to the agent of change principle whereby new developments must not compromise the function of existing nearby uses e.g. residential uses must not compromise the office function in a mixed use development such as through disturbance caused by noise or light pollution.

¹⁸ Configuration of development would be assessed on a case-by-case basis, informed by relevant policies of the Local Plan, including PLAN1 and policies relating to active frontages.

Exceptions to BC1 office provision

Policy BC1 part D states that in limited circumstances, the Council may determine that Parts B and C (the requirement of a proportion of office) do not apply. These circumstances are set out below:

Table 2. BC1 Part D exceptions

BC1 Part D exception	Notes
(i) where an existing use, which is protected by another Local Plan policy or allocation, is expected to be the predominant use to be re-provided on site;	For example social or community infrastructure protected under policy SC1, or cultural uses protected under policy R10.
(ii) where a particular site is considered more suitable for other types of business floorspace such as B1(c) space. In such cases, the relevant percentage/requirement set out in Part B or C would apply to total business floorspace rather than office;	If required to allow for future flexibility for a range of occupiers, and provide a range of unit types and sizes, or to provide a need for a for an SME or a particular business, for example a creative sector business or maker space.
(iii) where a proposal is publicly funded or serves a public service, such as educational, medical, or research institutions;	For example established universities which receive government funding, or medical uses such as hospitals and clinics which are part of the NHS.
(iv) development which is proposed in wholly residential parts of the AAP area, such as housing estates; or (v) proposals for small-scale extensions to existing residential buildings where it is not practical or reasonable to introduce office uses.	The area is home to a number of housing estates where additional housing is the most appropriate use, in terms of compatibility with housing estate and also with the benefit of providing new affordable housing. In addition this exception allows for the extension of residential buildings which cannot be practically extended for commercial uses, for example if the addition of commercial uses required works that made the scheme unviable such as the addition of a new access core.

Viability

- 4.11 The viability, and hence deliverability, of the proposed office-led approach has been tested in the Local Plan Viability Study 2018. This report tests the ability of developments in Islington to accommodate emerging policies in the Draft Local Plan, including policy BC1. A number of commercial typologies in central London were tested including two which were entirely B1a office use, which was found to be viable. These sites are listed in Table 3 below.

Table 3. Viability typologies tested (policy compliant commercial schemes in the BCAAP area)¹⁹

	Retail A1-A5	B1 office	Mix
Site 15: Office led mixed use EC1V	None	26,794sqm	100% Office
Site 16: Office led mixed use EC2Y	6,914sqm	62,227sqm	10% retail 90% office
Site 17: Intensification of business use EC2A	None	12,206sqm	100% Office

Delivery of housing, mixed use character

- 4.12 Arguably policy BC1 by prioritising office development may potentially lead to less housing being developed in the Bunhill and Clerkenwell AAP area compared to if no such policy was applied. Two of the potential impacts of this is the impact of housing delivery in the borough across the plan period, and also the impact on the mixed use character of the area. These impacts have been considered in development of the policy.
- 4.13 Local Plan evidence as set out in the housing topic paper shows that over the plan period the Council will meet its housing target with policy BC1 in place. In addition the AAP area, being part of Islington’s CAZ, are prioritised by London Plan Policy SD4 and SD5 and Islington Local Plan policy B1 and B2 for development of commercial uses in particular office development. These policies aim to support the nationally and internationally significant agglomeration of offices and uses including clusters of creative industries, business, professional and financial services, arts and culture, health, education, and law.
- 4.14 With regard to the mix and balance of uses across the AAP area the Bunhill and Clerkenwell AAP area is a mixed use area with a significant proportion of the land being in residential use covering a range of typologies including historic terraced housing, postwar housing estates, and newer infill development. In the last decade there has also been very significant residential development in the area, predominantly in the Bunhill ward. Table 4 below shows that over the last ten years 17% of the borough’s housing delivery has been within the Bunhill and Clerkenwell wards (which approximately covers the AAP area). A feature of this development has been large scale new residential development in tall buildings, including:
- Canaletto: 31 storeys, 190 homes,
 - Lexicon: 36 storeys, 146 homes),
 - 250 City Road: two towers of 36 and 42 storeys and comprising 930 homes and a 190 room hotel (under construction), and
 - The Atlas building: 39 storeys, 302 homes (in Hackney).

¹⁹ London Borough of Islington: Draft Local Plan Viability Study 2018

- 4.15 The prioritisation of office development in the new plan, as opposed to continuing with the high delivery of housing, will maintain this mixed use character and is not in danger of creating 'sterile' commercial precincts.

Table 4. Housing completions in Islington (wards) 10 year trend

Ward	FY2009	FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	Total	Percentage
BARNSBURY	210	152	21	20	12	25	25	8	4	129	606	
CALEDONIAN	37	16	12	39	53	72	61	17	8	158	473	
CANONBURY	79	8	23	3	12	3	66	6	1	31	232	
FINSBURY PARK	78	76	195	197	-	39	38	32	108	19	30	734
HIGHBURY EAST	22	2	132	94	7	109	19	8	16	16	425	
HIGHBURY WEST	214	57	106	52	648	187	41	7	21	18	1,351	
HILLRISE	51	7	16	97	17	44	29	1		49	311	
HOLLOWAY	94	-	143	14	135	192	18	44	4	25	19	402
JUNCTION	12	12	15	32	41	74	8	150	159	6	509	
MILDMAY	48	112	34	24	56	9	28	9	14	-	334	
ST. GEORGE'S	66	19	30	16	4	18	39	34	35	45	306	
ST. MARY'S	39	30	12	29	79	43	68	66	13	6	385	
ST. PETER'S	153	-	10	144	27	12	192	515	170	12	266	1,481
TOLLINGTON	42	16	47	23	22	14	34	18	30	10	256	
Total rest of the borough	1,145	354	801	788	1,116	846	1,009	606	357	783	7,805	83%
BUNHILL	287	82	324	249	139	26	37	71	18	123	1,356	
CLERKENWELL	47	27	59	3	8	13	6	19	13	10	205	
Bunhill and Clerkenwell	334	109	383	252	147	39	43	90	31	133	1,561	17%
Grand total											9,366	

Policy BC2 Culture, retail, and leisure uses

- 4.16 Policy BC2 of the Bunhill and Clerkenwell Area Action Plan sets out the council's policies for culture, retail, and leisure uses for the BCAAP area. The area is home to two existing Local Shopping Areas – Exmouth Market, and Whitecross Street. The new Local Plan proposes two additional Local Shopping Areas at Old Street and Farringdon. These areas have been added in response to the new London Plan, which identifies Farringdon and Shoreditch²⁰ as CAZ retail clusters (but does not provide information on the extent of any boundaries). The Council considers that it is appropriate to designate these areas as Local Shopping Areas to address the London Plan. Explanation of the boundaries chosen is provided below.
- 4.17 Local Shopping Areas are small shopping streets that provide for local convenience shopping, amongst other things. There are 40 Local Shopping Areas in the Borough. Development in Local Shopping Areas is controlled by policy R4 of the Local Plan.
- 4.18 Policy R4 of the Strategic and Development Management Policies states that all proposals in Local Shopping Areas should maintain and enhance the retail and service function of that Local Shopping Area, and it also protects against loss of A1 shops in these areas.
- 4.19 Policy BC8 of the existing Finsbury Local Plan contains a policy which maintained the proportion of A1 retail units in the two Local Shopping Areas in the AAP area (Exmouth Market and Whitecross Street) to a minimum of 35%.
- 4.20 The BCAAP does not include such a requirement. This change unifies the policy approach for all LSAs in the borough, as those LSAs outside the AAP area in the current adopted Local Plan do not have the 35% A1 minimum requirement.
- 4.21 Policy R4 of the Local Plan (which controls development in Local Shopping Areas including in this area) includes strong protections for all existing A1 uses in Local

²⁰ The London Plan identifies Shoreditch as a cross-boundary cluster covering parts of Islington and Hackney.

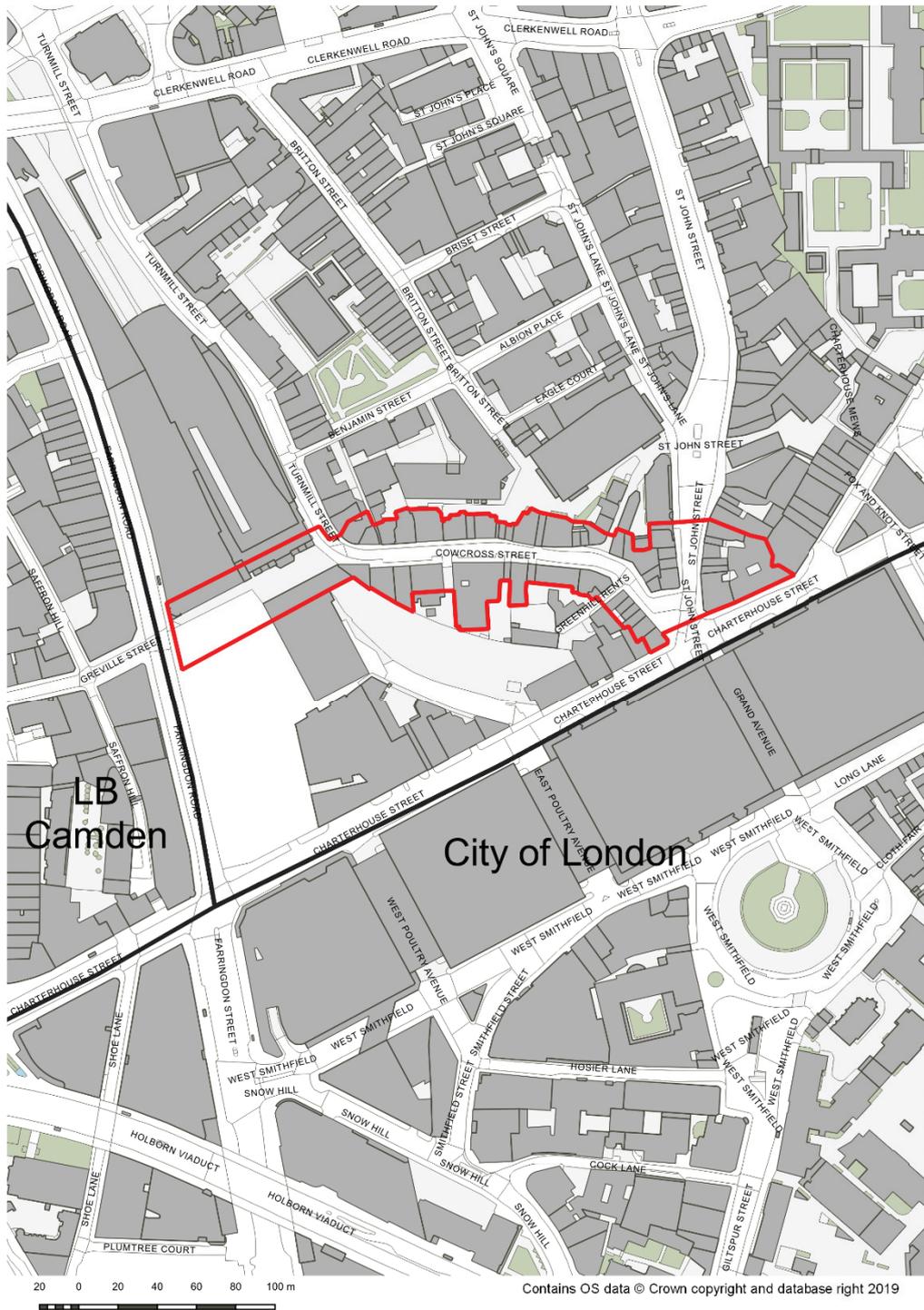
Shopping Areas. Further prescription through imposition of a minimum percentage of A1 is considered unnecessary.

- 4.22 LSAs generally have a retail focus but there are some, including within the BCAAP area, which have a more balanced retail and leisure role.

Farringdon LSA

- 4.23 The LSA boundary defined at Farringdon links the Farringdon Station entrance to Smithfield Market in the City of London; it also includes a small section of the southern part of St. John Street. Cowcross Street is not only an important link, but also a destination in its own right owing to the variety and quality of uses on the street. Most of the frontages in this area are active with a number of shops, cafes, restaurants, and pubs. The map showing the boundary of the Farringdon LSA is shown on Figure 1 below.

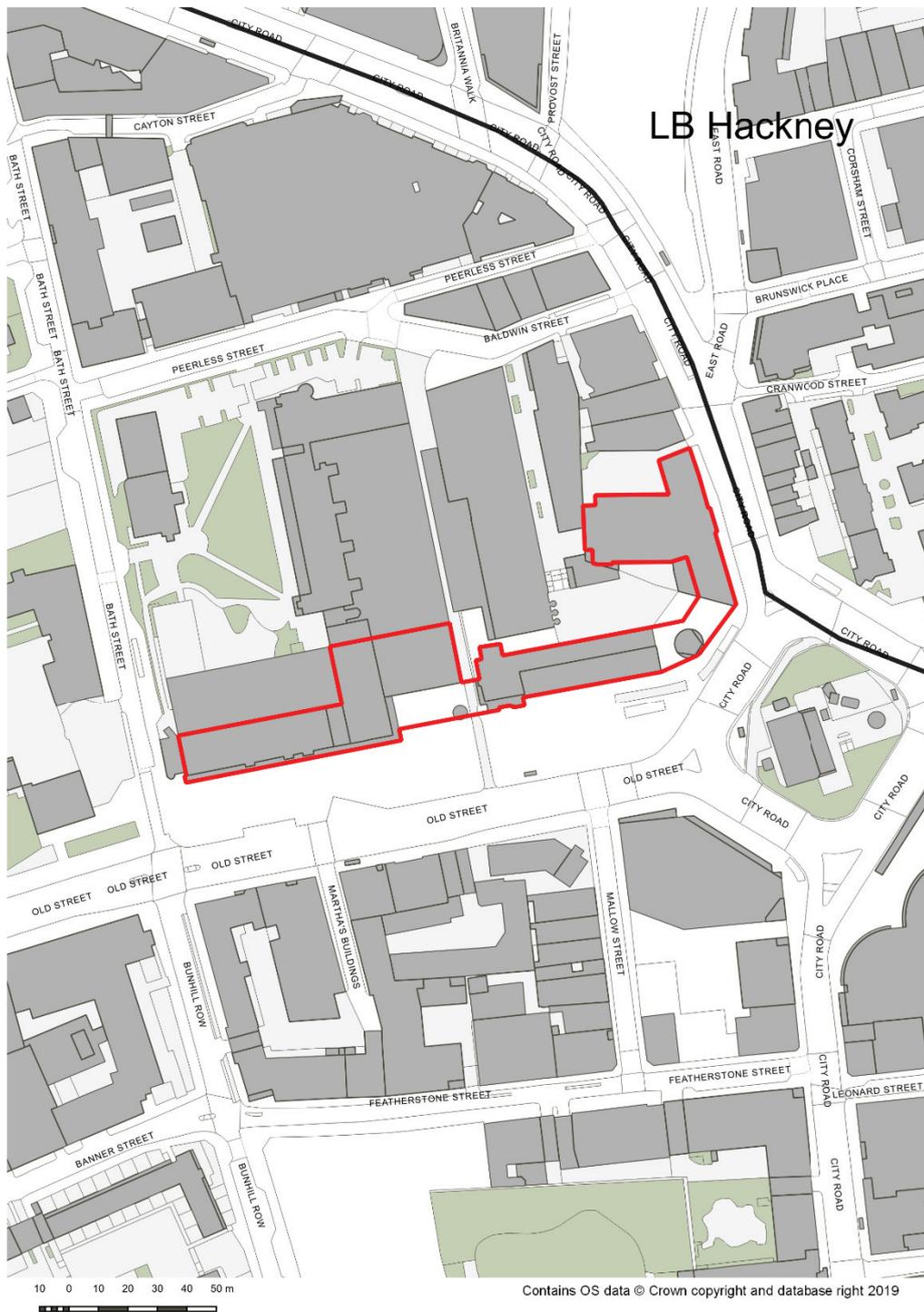
Figure 1. Farringdon Local Shopping Area boundary



Old Street LSA

- 4.24 The LSA area includes frontages on the Old Street Promenade of Light on the northwest side of Old Street roundabout, and also includes the ground floor units of the Grade II listed Leysian Mission on City Road. The LSA includes larger retail units and a number of restaurants and cafes, amongst other uses.
- 4.25 This new designation will help manage the supporting retail function of this location. Old Street roundabout is set to undergo significant improvements including removal of the gyratory, public realm improvements, new public open space, improvements to station access and facilities including enhanced retail provision. Therefore, the protection of retail uses in the area via the new LSA designation will ensure continued provision of important services.
- 4.26 The map showing the proposed boundary for the Old Street LSA is displayed Figure 1 above Figure 2 below.

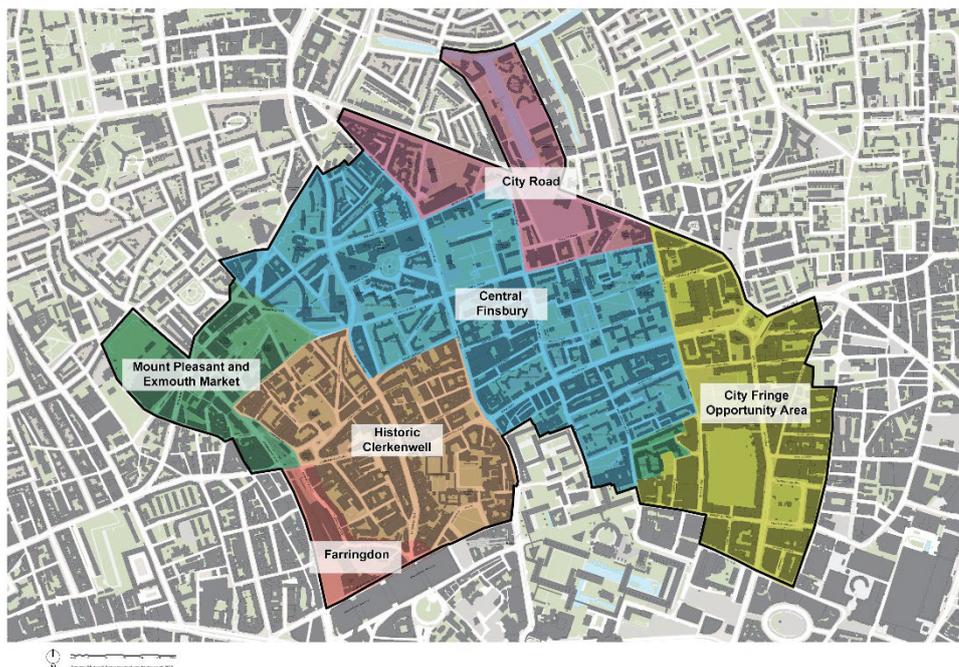
Figure 2. Old Street Local Shopping Area boundary



Area Spatial Strategies

- 4.27 Spatial strategy policy for the Bunhill and Clerkenwell Area is set out in the Islington Strategic and Development Management Policies document policy SP1. This policy summarises the policy for this area and then refers across to the BCAAP for further detail.
- 4.28 The BCAAP includes area spatial strategies for six defined areas. The existing Finsbury Local Plan also contained area spatial strategies covering seven areas within Bunhill and Clerkenwell, with a significant part of the area falling outside these spatial strategy areas. The spatial strategy areas have been reviewed as part of the BCAAP and the AAP area is now fully covered by a spatial strategy policy. The spatial strategy areas in the BCAAP are as follows:
- City Fringe Opportunity Area
 - City Road
 - Farringdon
 - Mount Pleasant and Exmouth Market
 - Central Finsbury
 - Historic Clerkenwell

Figure 3. Area Spatial Strategies



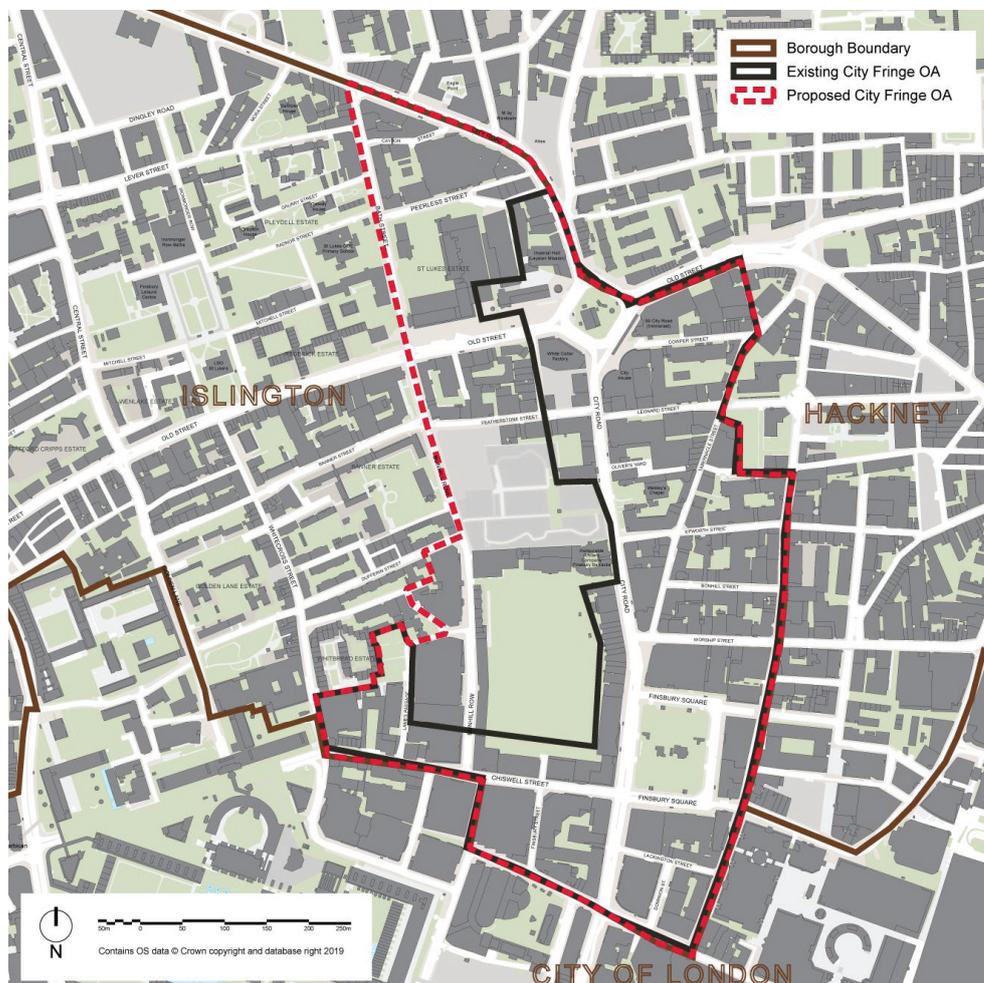
- 4.29 Each spatial strategy area has a policy in the AAP which sets out the key strategic considerations for each area. Each area policy set out information covering:
- Strategic role,
 - Character of the built environment,
 - Key uses, institutions, landmarks,
 - Objectives for this area,
 - Role of retail, food and drink, and leisure uses, and
 - Opportunities to improve the public realm.

- 4.30 The areas have been defined according to existing characteristics and future opportunities. Some areas have a more uniform character, for example Historic Clerkenwell, whereas other areas are more mixed, such as Central Finsbury.

City Fringe Opportunity Area

- 4.31 The City Fringe Opportunity Area (OA) covers parts of the London boroughs of Islington, Tower Hamlets and Hackney and includes the Tech City business cluster.
- 4.32 The existing OA boundary was adopted in the Finsbury Local Plan. This is the boundary that forms Islington’s part of the OA in the City Fringe OAPF. As noted in section 2, we consider that the OAPF will remain extant upon adoption of the new London Plan.
- 4.33 As part of the Local Plan process the Council has proposed an extension to the City Fringe OA within Islington (see Figure 4 below). This new boundary would supersede the boundary identified in the OAPF.

Figure 4. City Fringe Opportunity Area existing and proposed boundaries



- 4.34 The proposed boundary includes a number of key development sites which will contribute a significant amount of new office floorspace, including Moorfields Eye Hospital (Site Allocation BC38) and Finsbury Tower (Site Allocation BC35). These sites along with other development opportunities within the revised area will contribute

to the supply of office floorspace to help meet jobs projections and to support the continued development of Tech City.

4.35 The revised boundary includes Royal Artillery Grounds and Bunhill Fields as a matter of geographic logic however it does not indicate that they are sites for development. These open spaces are protected against development and their settings are protected against inappropriate development by Local Plan policies.

4.36 The Moorfields Eye Hospital NHS Foundation Trust responded to the Draft Islington Local Plan including the Bunhill and Clerkenwell Area Action Plan consultation (14 January 2019). They stated:

“We note that the draft Policies Map Changes proposes to extend the City Fringe Opportunity Area Planning Framework (OAPF). There are a number of sites that are covered by the extension but most notably the designation is extended to include the entirety of Site and indeed properties immediately to the north. We strongly support this amended designation and welcome the provisions within the GLA’s CFOAPF that this designation brings.”

5. Consultation responses

The Consultation Statement sets out the Council's response to representations received during previous consultation exercises on the BCAAP. For representations related to other policies please refer to the relevant topic paper – e.g. for comments on the Local Plan employment policies B1 and B2 refer to the topic paper on Employment. All representations related to site allocations in the Bunhill and Clerkenwell Area are responded to in the site allocations topic paper.

A number of representors, in particular developers and landowners, called for greater flexibility with regard to BC1 requiring new development in the area to office led. There were concerns over the minimum percentage requirements for office development (80% and 90%), and the effects this would have on development viability and the character and function of the area.

Please note that the Council amended Policy BC1 following representations received in the regulation 18 stage to apply the minimum percentages of office from applying to total gross floorspace to apply to the net additional floorspace. This change ensures that redevelopment is not constrained by the need to replace existing uses with office development, and adds flexibility overall.

A number of representors also called for increased flexibility to added to Policy BC2 which controls cultural, retail, and leisure uses in the area. The flexibility was with regard to supporting the night time economy to support economic growth in the area. The key issues raised during consultation are summarised below.

Greater London Authority / Mayor of London

Regulation 18 – Draft Local Plan

The Mayor's response to the Regulation 18 consultation noted that the Local Plan was considered to be in general conformity with the new London Plan.

The Mayor made the following comments of particular relevance to the BCAAP. The Mayor supported policy SP1 of the Strategic and Development Management Policies and policy BC1 of the BCAAP and welcomes Islington's approach in identifying the Bunhill and Clerkenwell area for predominantly office growth. In relation to the City Fringe Opportunity Area (OA), the Mayor notes the areas low capacity figure for housing arrived at through the London SHLAA 2017, and considers that Islington's approach, which strongly promotes office development within our portion of the OA, is consistent with the new London Plan, as the OA homes target could be delivered in other OA boroughs.

The Mayor also strongly welcomes the designation of a cultural quarter at Clerkenwell and Farringdon, which is supported by policy HC5 of the new London Plan.

Regulation 19 – Proposed Submission

The Mayor's regulation 19 representation states that Policy B2 of the Local Plan Proposed Submission, which directs office use to the CAZ and Priority Employment Locations is in line with London Plan Policies E1 and SD4 and is welcomed by the Mayor.

The representation also states that BCAAP Policy BC1 reflects London Plan Policy E1 by prioritising employment uses in the CAZ. It also states that culture, retail, and leisure uses are second level priority for the area and as such are in line with London Plan Policy SD4.

The Mayor also supports the BCAAP responding positively to the opening of the Elisabeth Line station at Farringdon and planning for significantly greater levels of pedestrian movement.

Council response

The Council welcomes support from the Mayor.

King's Cross Baptist Church

The King's Cross Baptist Church responded to Regulation 18 and 19 stages of the plan. The church is located on Vernon Square, outside the Bunhill and Clerkenwell AAP area. Their representation questions why this area is excluded from the Area Action Plan area. They state that the area is a very intense urban area, and note issues with poverty, homelessness, and drug and alcohol dependence.

Council response

This area was not included in the AAP area as it has a more residential character and function when compared to the more commercial role of the AAP area and its density and character. With regard to poverty, homelessness, and drug and alcohol dependence the AAP does not contain specific policies to address these issues. The Local Plan addresses these issues on a strategic level through housing policies (affordable housing, supported housing) and also policies on social and community infrastructure, affordable workspace, and social value. Direct interventions within the remit of a local authorities to tackle issues such as substance addition do not fall within the remit of planning, but other council support services such as Housing Aid.

Islington Living Streets

Islington Living Streets provided a detailed response that focussed on improvements related to improving conditions for walking and cycling. This included:

- A call to semi-pedestrianisation key shopping streets,
- A call to remove motor traffic from Old Street and Clerkenwell Road,
- Support for the policies regarding City Road basin which retain it as a place of recreation and relaxation and improve pedestrian access to the area,
- A call to reduce traffic on Cowcross Street and establish a public space on St John Street,
- A call to remove electric vehicle charging points from Cowcross Street and charging points should not be placed in areas designated for shopping or improvement,
- A call to add policy on improving the clean air walking route along Amwell Street to Farringdon, and other improvements for walking in this area, and
- Support for pedestrian access through the City University Northampton Square Campus site.

Council response

In general, the Council supports public realm schemes which improve conditions for walking and cycling, and that reduce the impact of traffic. We have not set out detailed aspirations for these spaces in the BCAAP as the design solutions for these streets, should they come forward for public realm improvements, must be based on detailed and site specific analysis undertaken by the transport planning team.

Sport England

Sport England's representation states that the Council should consider D2 sport uses, including fitness clubs, gyms, climbing centres, and 5-a-side centres to be acceptable on employment sites as they provide sustainable employment opportunities, and that these uses should be added to policies BC1 and BC2.

Council response

While there are benefits to locating sport and leisure uses in employment areas, given the evidence of need for employment floorspace in the borough and the scarcity of development opportunities the council believe it is more appropriate to prioritise employment uses in this area. However sport and leisure uses may be developed as supporting uses as part of the 10 or 20% non-office uses allowed under policy BC1.

Residents – Finsbury Leisure Centre

The Council received a large number of representations from residents objecting to the proposed redevelopment of the Finsbury Leisure Centre. Some of these representations referred to policy in the BCAAP.

These representations state that BCAAP policy BC7(f) does not comply with NPPF Policies 96 and 97 due to the loss of open space, sport and recreating facilities. These representations also state that the additional housing is not required in accordance to the Bunhill and Clerkenwell Urban Design Study 2010, page 45.

Council response

BCAAP policy BC7 reflects the site allocation for the Finsbury Leisure Centre site which requires the re-provision of a high quality leisure centre, as well as public open space. A more efficient use of the site and a better layout of the proposed buildings will create an opportunity to also deliver new homes including much needed homes for social rent. The Bunhill and Clerkenwell Urban Design Study 2010 referred to development quantum and targets at the time. There have been significant changes to population and development projections in the last decade, which renders this part of the study out of date.

Bee Midtown

Bee Midtown provided a detailed response where they set out how they want to help shape and improve the area. Key points raised are:

- The policy needs to ensure that new developments and investment reflects the new role of the area with a focus on enhancing public realm to promote pedestrian circulation and high quality linked public spaces.
- Support for policy B1 to boost office space within EC1 and to deliver a range of workspace types/unit sizes which are affordable to a range of small occupiers.
- Support for Policy BC2, which seeks to encourage active frontages for ground floor space – such as retail and leisure uses.
- Support for retail, food, drink and entertainment venues opening up in the Clerkenwell area.
- A call for a more flexible approach on the Clerkenwell cumulative impact policy and encourage a diversification towards non-vertical drinking establishments.

Council response

- The Local Plan includes a number of policies to promote new public open space and public realm improvements. In terms of delivering schemes, this is done through CIL/S106 through engagement with communities and businesses, as detailed in the community plans.
- Support for various policies welcomed.
- With regard to vertical drinking establishments Both vertical and non-vertical establishments could fall within A3, A4 or a mix of these uses and control of these uses falls under licencing. It should be noted however that the draft plan has a number of policies to protect and promote restaurants, cafes and other retail or leisure uses. Cumulative impact areas are considered as part of the licensing regime, and while they can be material in terms of planning applications, this would depend on individual circumstances.

Lambs Passage Real Estate Ltd.

Lamb's Passage Real Estate Ltd support the priority for office floorspace in the Bunhill and Clerkenwell AAP area, and the policy to maximise new business floorspace. They have objections to the other business floorspace policies in the Development Management Policies.

Council response

The Council welcomes support on these policies. With regard to the comment on flexibility the respondent has made no suggested changes to BCAAP policies. Please refer to the employment topic paper for further detail on this representation.

Picton properties

Picton Properties proposed amending the plan to allow decking of the railway to allow major redevelopment in the Farringdon area, a new public open space, and multiple public benefits resulting (Site Allocation BC20, 50 Farringdon Road, and policy BC5 Farringdon). Picton properties called for a number of changes to make the policies more flexible. They key points raised are:

- Policy BC1 should be amended to provide flexibility and assist delivery of development sites that are not in the core commercial centres within the AAP.
- Policy BC1 part B, which requires developments of 500sqm or more of any use class to be 80 or 90% office use, is unreasonable, and might act as a deterrent for other commercial uses (e.g. retail) coming forward for new employment or leisure (e.g. a gym or restaurant) development. They consider that this requirement should relate to proposals for new office-led development only.
- The 80% requirement of policy BC1 is high, and suggest changing the proportion down to 50%.
- Policy BC1 part C requires office led development in schemes below the threshold for part B of 500sqm. They suggest amended wording for Part C to make specific reference to B1a office development only. For example, small-scale development by non-commercial office developers (e.g. a retail unit) should not be required to adhere to this policy requirement (as currently drafted) and we consider that this would be an unreasonable requirement.
- Policy BC1 part D(iv) should be made more flexible to allow residential development in more areas, in particular not just wholly residential areas such as housing estates, but also predominantly residential areas and semi residential areas.

Council response

With regard to the concept of decking over the railway line there are significant potential barriers to this type of development. In this case that includes the high cost of such work when balanced against the site's limitations, including the protected viewing corridor. The Council does not consider that the development proposed by the amendment to the allocation is deliverable and does not think it is appropriate to amend the site allocation as suggested. A developer may still submit a pre application or planning application for assessment.

Taken together, the effect of the suggested changes to policy BC1 will result in far less employment floorspace being delivered in the BCAAP area. This does not accord with the Council's priorities for the area and is not supported.

Hondo Enterprises

The key points made by Hondo Enterprises are:

- Support for policy B2 as it is flexible and allows employment floorspace to respond to market demands.
- Criticism of policy BC1 part B stating that it sets an inflexible and prescriptive office space contribution which does not afford any flexibility for changing market demand. In addition they state that the limited circumstances set out in part D are still too restrictive.
- Support for the element of policy related to Finsbury Square improvements and for Part J of BC3 which is supportive of the improvement of Finsbury Square subject to no net loss of open space.

Council response

- The Council welcomes the support.
- With regard to BC1 part B the policy allows a small proportion of other uses on site, 10% in the City Fringe Opportunity Area, and 20% in the rest of the AAP area. This allows a range of uses, particularly on the ground floor, to support the business uses and to support the vitality and viability of the area. The Council believe that this balance of uses is appropriate given the importance of office floorspace to the borough, the employment cluster in including Tech City and the strategic function of the CAZ, while still retaining vital and viable urban environment.

Corporation of London

They key points made by the Corporation of London are:

- Support for identification of the Clerkenwell/Farringdon Cultural Quarter which complements the City Corporation's aspirations for the adjoining Culture Mile area.
- They support the identification of Farringdon and Whitecross Street as Local Shopping Areas.
- A request for two words to be added to the text: 'proposed' relation of the Museum of London, and 'possible' moving of Smithfield Meat Market from its current location.

Council response

Support welcomed. With regard to the comments on the Culture Mile the Council will make the suggested changes as modifications to the plan.

The Methodist Church

The Methodist church support strategic objective of providing office floorspace, but also state that policy BC1 should be made more flexible to take into consideration development viability, and the percentage requirement for office should be removed and changed to a be a majority. They believe that this is necessary to ensure office led development is not stymied by the requirement for 90% office. In addition, they state that Part D (the exceptions to part B and C) should be expanded to include proposals which provide social value and enhanced community facilities.

The Methodist Church support the anticipated growth of office floorspace in the area as well as the enhanced provision of retail and cultural floorspace. They also state that the allocation of Oliver House (Policy BC33) will be a strong contributor to this strategic objective and would be able to deliver a mix of uses in accordance with Policy SP1.

The Methodist Church support the development of retail and leisure uses in predominantly commercial areas. They suggest making it clearer that 'predominantly commercial areas' includes the City Fringe Opportunity Area.

Part D. (i) states that new A Class uses are permitted where they would not harm vitality, viability, character, function or amenity of the area. The Methodist Church would like to see further guidance on how the LPA defines 'harm' in these instances."

Council response

The Council does not agree with the proposed changes to make BC1 more flexible. As set out in this topic paper there is a very significant need for office floorspace in the borough and these changes would stop office floorspace from being provided.

The definition of predominantly commercial areas is a matter of planning judgement. The Council believes this is an appropriate policy approach given the complexity of the AAP area.

With regard to defining harm the Council believes that the policy wording referring to vitality, viability, character, function or amenity is a sound basis for assessing types of harm.

Other relevant representations

A number of representations were received for the area based policies in the BCAAP. Key issues included:

- Call to allow residential moorings on the City Road Basin (Canal and River Trust)
- Support for the extension of the City Fringe Opportunity Area, support for redevelopment of the Moorfields Hospital site as a business quarter, and support for siting of tall buildings on this site (Project Oriel – Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology)
- Call to add consideration that receipts from the sale of the Moorfields Hospital Site will be used exclusively to fund the new hospital, education and research facility at Kings Cross (Project Oriel – Moorfields Eye Hospital NHS Trust and the UCL Institute of Ophthalmology)
- Objection to the north south pedestrian access through the Charterhouse Square Campus (Queen Mary University of London)

Council response

- With regard to the call for residential moorings the Council does not support giving residential moorings priority over leisure moorings. The council considers its

approach to be justified and in accordance with NPPF paragraph 35 as it seeks to meet the borough's objectively assessed needs.

- With regard to the request to add consideration of receipts to the policy regarding the Moorfields Hospital Site the Council do not believe that this is an appropriate consideration to add into the BCAAP.
- With regard to access through the Charterhouse Square Campus the Council considers that increased permeability through the site is an important aspect of any proposed redevelopment. The route indicated in the BCAAP is indicative, therefore an alternative route may be appropriate. We note that proposed improvements which also entail restrictions could be suitable, dependent on appropriate justification. The allocation is worded broadly to reflect the principle of permeability, and doesn't, for example, prescribe a 24hr publicly accessible through route.